

**OPERATIONAL ENVIRONMENTAL  
MANAGEMENT PLAN  
FOR  
ENVIRO WASTE SERVICES GROUP PTY LTD  
14-16 KIORA CRESCENT, YENNORA NSW**

**Prepared for:** Enviro Waste Services Group Pty Ltd

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**Benbow**  
ENVIRONMENTAL

*Engineering a Sustainable Future for Our Environment*

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## GLOSSARY AND ABBREVIATIONS

AQOMP	Air Quality & Odour Management Plan
AMMAAP	Approved Methods for the Modelling and Assessment of Air Pollutants in NSW
AMSAAP	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW
BCA	Building Code of Australia
BOM	Bureau of Meteorology
Council	Cumberland Council
DPIE	Department of Planning, Industry and Environment
ECO	Emergency Control Organisation
EIS	Environmental Impact Statement
EP	Emergency Plan
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPL	Environment Protection Licence under the POEO Act
FR NSW	Fire and Rescue New South Wales
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.
Industrial liquid waste	Liquid wastes from industrial sources, including Waste Oil (J120), Surfactants (M250), Grease trap waste (K110), Sewage sludge and stormwater (K130), and Landfill leachate (N205), as described in the EIS.
Liquid food waste	Waste consumable liquids such as juices and soft drinks (but not including dairy products), including out-of-date liquids, as described in the EIS
Liquid product waste	Waste liquid products such as shampoos, soaps etc., including out-of-date liquids, as described in the EIS
LWTP	Liquid waste treatment plant
Material harm	Is harm that: <ul style="list-style-type: none"> <li>a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or</li> <li>b) 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)</li> </ul>
N/A	Not applicable
Non-compliance	An occurrence, set of circumstances or development that is a breach of consent SSD-10407.
NSW	New South Wales
OEMP	Operational Environmental Management Plan
OTMPPS	Operational Traffic Management Plan and Parking Strategy
OSD	On-site detention
PIRMP	Pollution Incident Response Management Plan
PM <sub>2.5</sub>	Particulate matter of size 2.5 µm
PM <sub>10</sub>	Particulate matter of size 10 µm
POEO Act	Protection of the Environment Operations Act 1997
RNP	NSW EPA Road Noise Policy
SEPP	State Environmental Planning Policy
SWMP	Surface Water Management Plan
TfNSW	Transport for New South Wales
WHS	Work, Health and Safety
WMP	Waste Management Plan



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- Attachment A3: Forms
- Attachment A4: Environmental Procedures
- Attachment A5: Environmental Policy
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- B1: Operation Traffic Management Plan and Parking Strategy
- B2: Waste Management Plan
- B3: Surface Water Management Plan
- B4: Air Quality and Odour Management Plan





# 1. INTRODUCTION

This Operational Environmental Management Plan (OEMP) has been prepared for the liquid waste processing facility located at 14-16 Kiora Cres, Yennora.

The facility has been approved under SSD-10407 to process 110,000 tonnes of liquid waste per year and store 477 tonnes of waste at any one time. It undertakes scheduled activities on site and as such holds an Environment Protection Licence (EPL) (No. 20444) for waste processing (non-thermal treatment). The company also holds a non-premises based EPL (No. 13039) for the transport of trackable waste.

This OEMP details the necessary procedures and safeguards to effectively manage the on-site and off-site environmental impacts of the site operations.

The OEMP identifies environmental legal requirements and identifies and assesses the risk of potential impacts based on the site activities. It is the guiding document to facilitate the implementation of environmental management at the site including specific objectives and targets for both the short and long term. A copy of this EMP will be available on site at all times.

This OEMP has been prepared in line with the *Guideline for the Preparation for Environmental Management Plans* (NSW DIPNR, 2004) and in accordance with Schedule 2, Part C, Conditions C1, C2, C3 and C4 of Schedule 2 of the Development Consent SSD-10407. The context for the plan is described in Section 1.2.

Enviro waste will not commence operation until the OEMP is approved by the Planning Secretary and will operate the development in accordance with the approved OEMP.

A description of the site's operations and the scope and objectives of this OEMP are outlined in the following sections.

## 1.1 PROJECT DESCRIPTION

### 1.1.1 Site Location

The development is located on two properties identified as; 14 Kiora Crescent Yennora (575 m<sup>2</sup>), also known as Lot 49 DP18211; and 16 Kiora Crescent, Yennora (1,113 m<sup>2</sup>), also known as Lot 50 DP18211. Both sites are within the Cumberland local government area. Figure 1-1 shows the site location in local context and Figure 1-2 presents an aerial view of the site.

Figure 1-1: Site Location (Local Context)

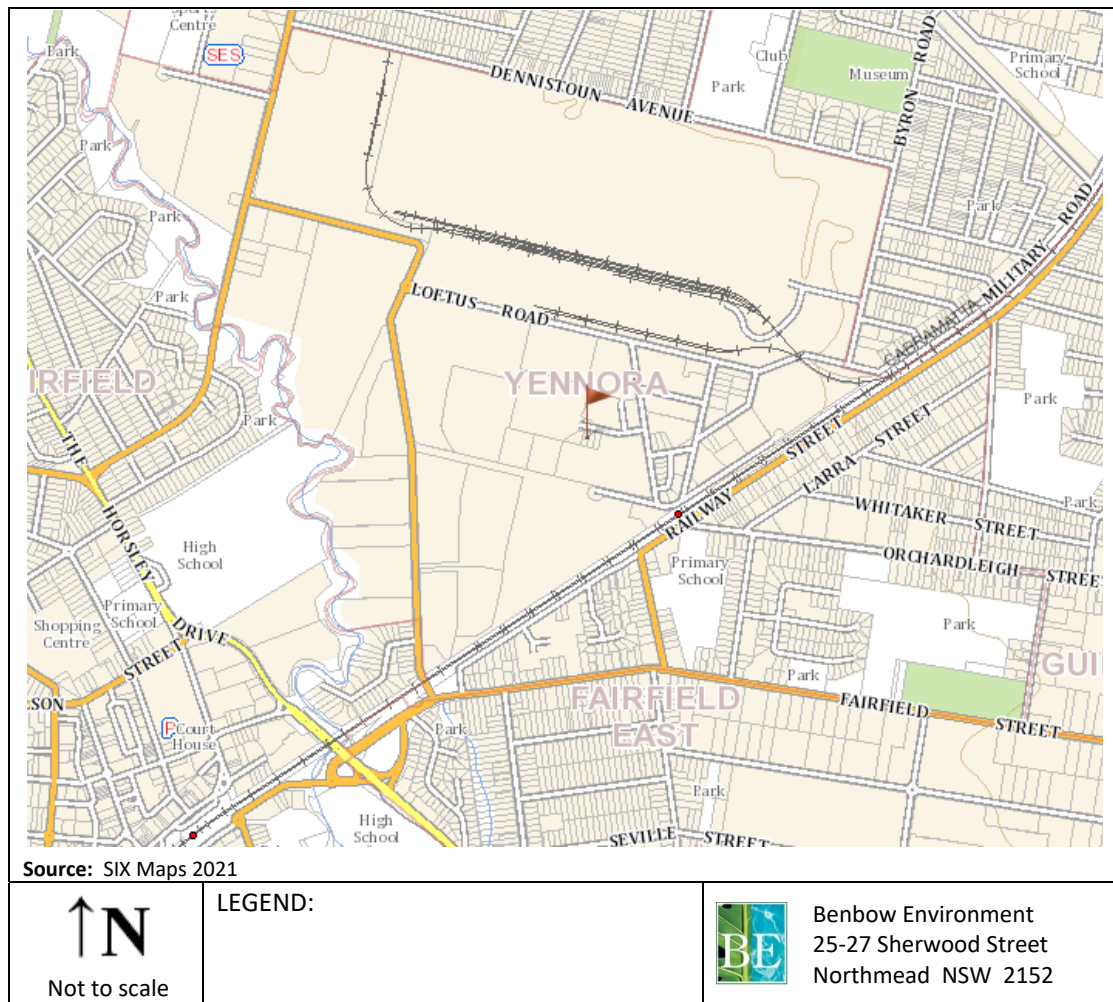
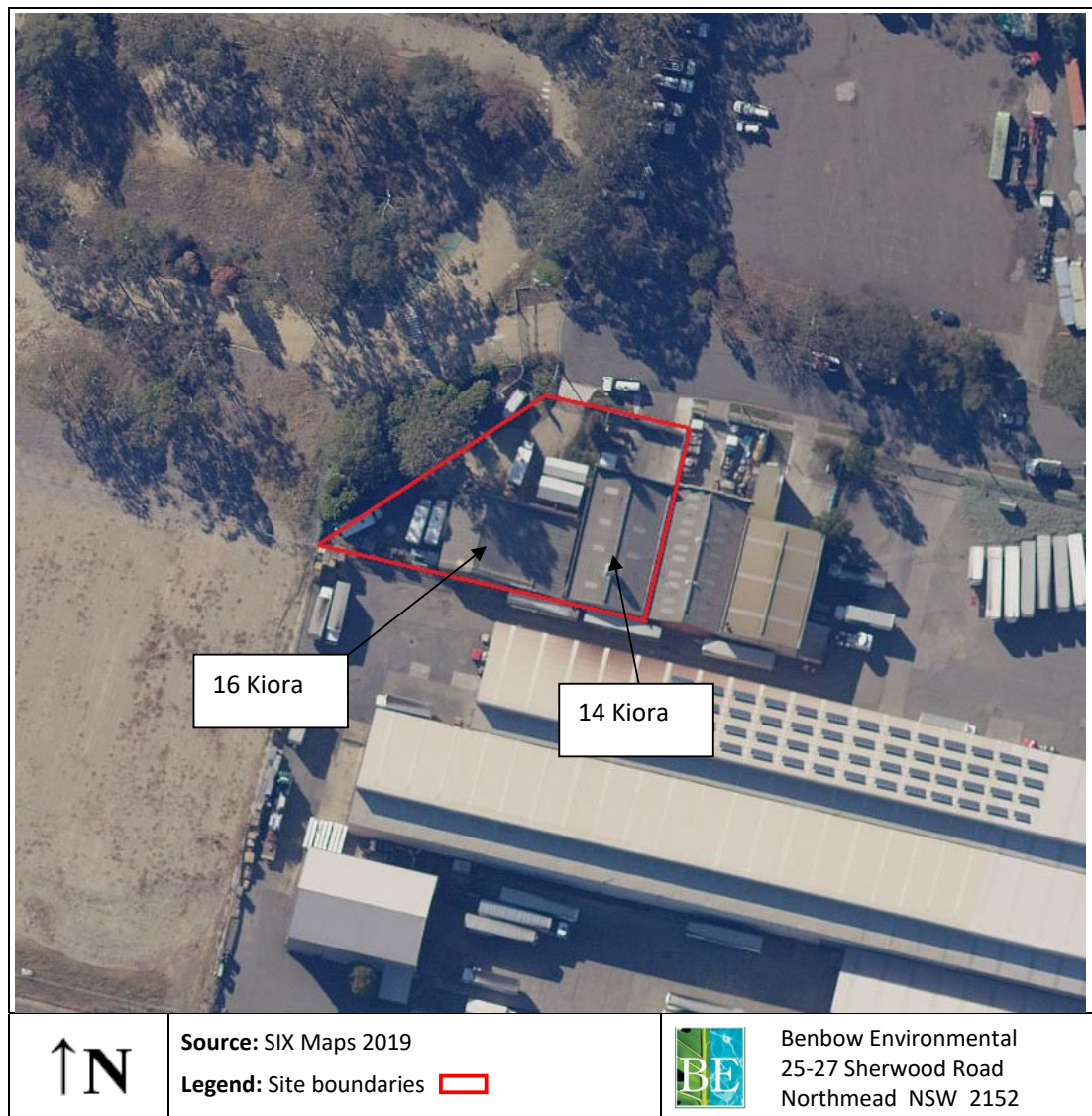


Figure 1-2: Aerial View of the Site



## **1.1.2 Operational Activities**

### **1.1.2.1 14 Kiora Crescent, Yennora**

The facility receives liquid wastes including:

- Residues from industrial waste treatment/disposal operations – landfill leachates (N205);
- Liquid waste material in glass, plastic or aluminium containers;
- Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials (M250);
- Waste oil/hydrocarbons mixtures/emulsions in water (J120);
- Sewage sludge & residues (K130); and
- Grease trap waste (K110).

The operation of the facility involves the following activities:

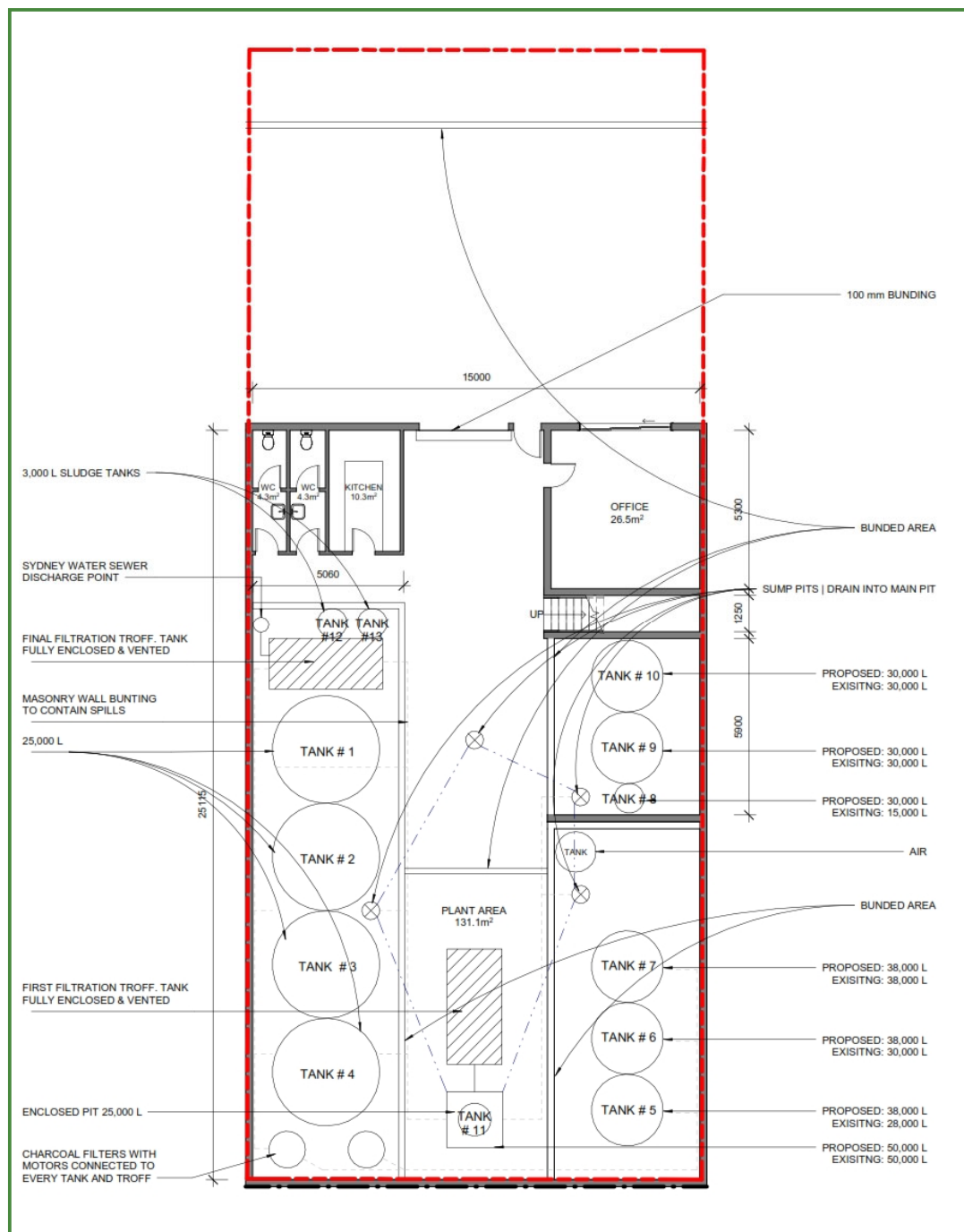
- Unloading and loading of liquid waste from tanker trucks;
- Filtration of solid debris;
- Separation of solids;
- Separation of oils and sludge; and
- Separation of oil and water.

Storage Tanks can hold a maximum storage at any one time: 377 tonnes (at 14 Kiora Crescent only).

Figure 1-3 shows the site plan and layout (including tank quantities) at the 14 Kiora Crescent site.



Figure 1-3: Floor plan for 14 Kiara Crescent



#### 1.1.2.2 16 Kiara Crescent, Yennora

The facility at 16 Kiara Crescent receives up to 10,000 tonnes per annum of waste including out-of-date liquid product/food waste for destruction. The total waste storage at any one time is limited to 100 tonnes. Additionally, the site at 16 Kiara Crescent provides office space and access for trucks and car parking.



Annual tonnage of incoming and outgoing waste from the out-of-date liquid product destruction process is detailed below.

**Incoming waste type (tonnes per annum)**

- Out-of-date liquids (food waste): 6,700
- Shampoo/liquid soaps: 1,600
- Shoes: 200
- Clothes: 250
- Makeup: 1,250
- Total: 10,000**

**Outgoing waste type (tonnes per annum)**

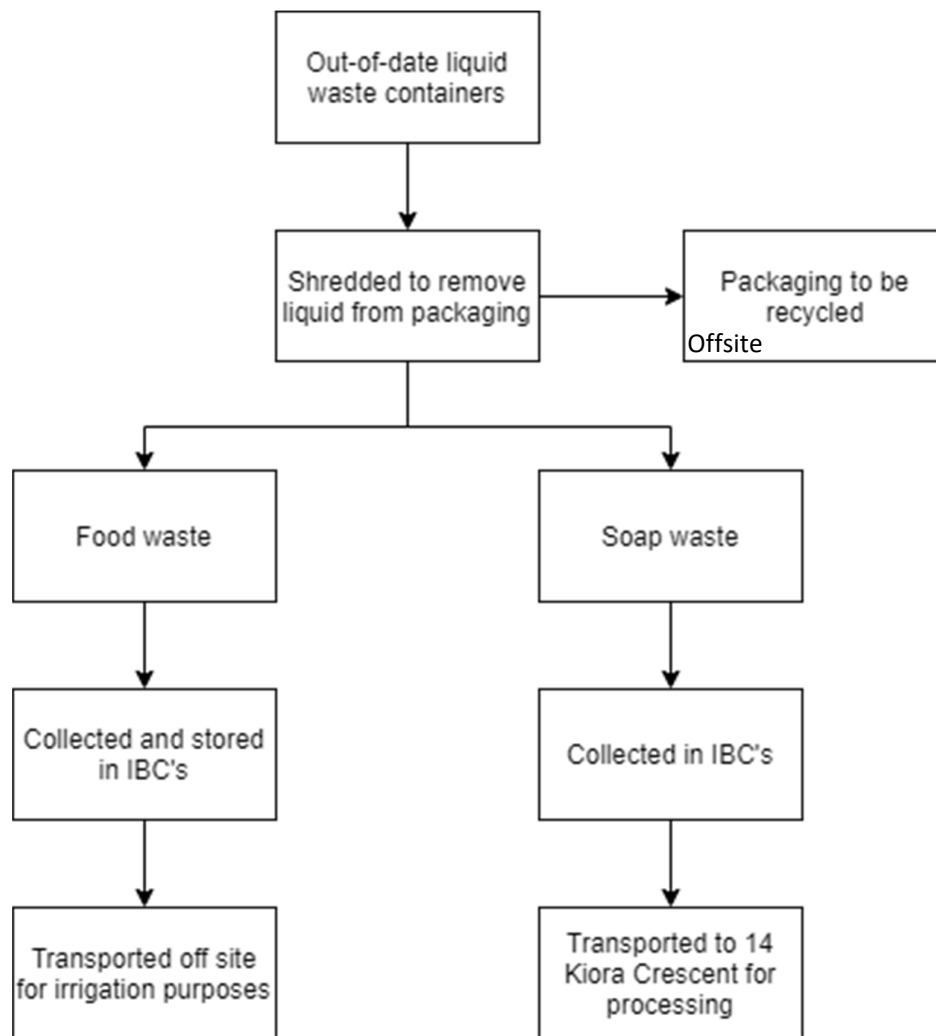
- Plastic: 950
- Cardboard: 950
- Aluminium: 950
- Liquid food waste: 4,600
- Liquid waste (other – for processing at 14 Kiora Crescent): 1,100
- Steel: 450
- Timber: 250
- Glass: 450
- Cloth: 200
- General solid waste: 100
- Total: 10,000**

The destruction and disposal of out-of-date liquid products/food wastes involves the following:

- Out-of-date, expired or perishable liquid food waste (such as fruit juices, soft drinks, shampoos and soaps) are divided by waste stream (food waste/liquid soaps etc.) and fed into a shredder to separate liquids from packaging.
- Shredded packaging containers (cardboard, plastics, aluminium) are collected and recycled.
- Liquid food wastes are collected into intermediate bulk containers (IBCs) and stored at 16 Kiora Crescent.
- Liquid soap wastes are collected and sent to 14 Kiora Crescent for further processing.
- IBCs containing food waste are transported off site to be used in irrigation practices for agricultural properties/farmlands. The contents of the IBCs would comply with the relevant resource recover exemptions/orders and/or NSW Department of Environment and Conservation “Use of Effluent by Irrigation” (2004) and ANZECC & ARMICANZ “Guidelines for Fresh and Marine Water Quality” Volume 3, Primary Industries — Rationale and Background Information (Irrigation and general water uses, stock drinking water, aquaculture and human consumers of aquatic foods) (2000).

Figure 1-4 shows the process diagram for out-of-date liquid product destruction at 16 Kiora Crescent.

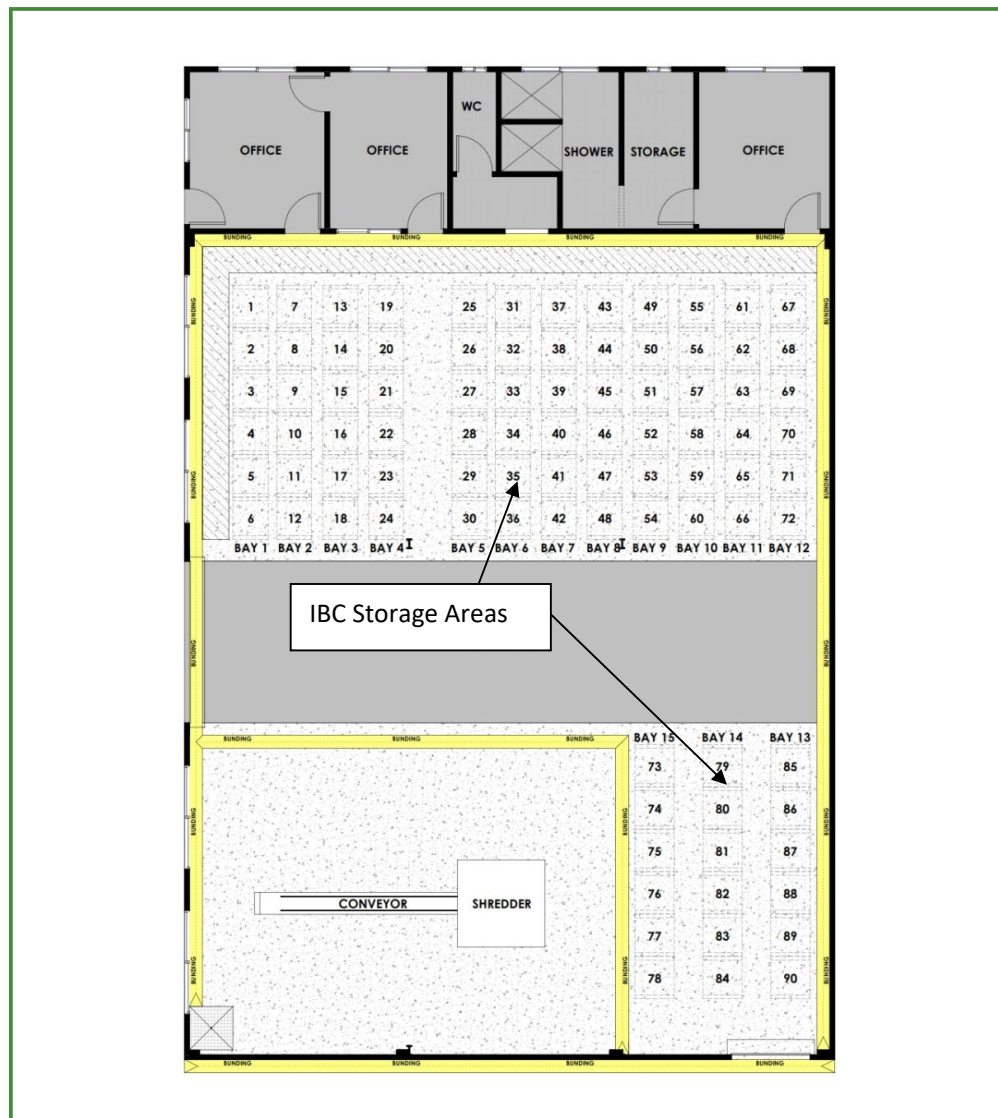
Figure 1-4: Process diagram of liquid product waste destruction



IBCs containing liquids to be transferred from 16 Kiora Crescent to 14 Kiora Crescent for further processing are delivered via forklift. The transit path is over the hardstand area in front of the buildings located at 14 and 16 Kiora Crescent. The quantity of waste transferred is a maximum of 1,100 tpa which is an average of 3 IBCs per day.

The floorplan for 16 Kiora Crescent is shown below in Figure 1-5.

Figure 1-5: Floor plan for product destruction processes at 16 Kiora Crescent



### 1.1.3 Site Facilities

The site at 14 Kiora Crescent consists of a building which houses a tank farm, filtration equipment, processing tanks, bundled areas, sump collection pits, odour control devices, unloading and loading areas, office and amenities. The tank farm consists of the following liquid waste tanks:

Table 1-1: Tank Volumes

	Existing	Proposed (L)
Tank 1	25,000	25,000
Tank 2	25,000	25,000
Tank 3	25,000	25,000
Tank 4	25,000	25,000
Tank 5	28,000	38,000

Table 1-1: Tank Volumes

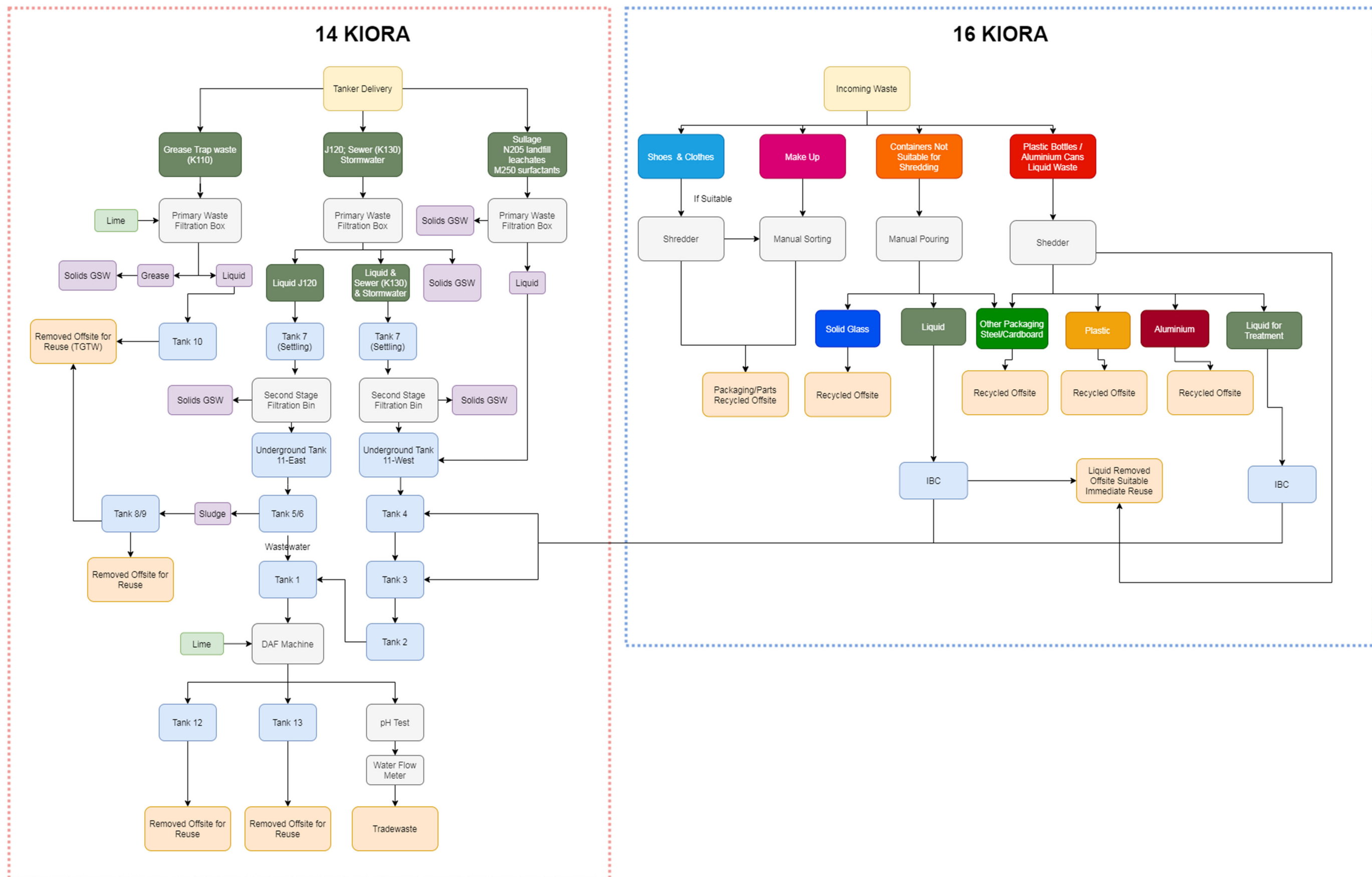
	Existing	Proposed (L)
Tank 6	30,000	38,000
Tank 7	38,000	38,000
Tank 8	15,000	30,000
Tank 9	30,000	30,000
Tank 10	30,000	30,000
Tank 11*	50,000	50,000
Tank 12	3,000	3,000
Tank 13	3,000	3,000

Notes: \* Tank 11 is an underground tank that is split into 2 compartments of 25,000 L each (Tank 11 – west and Tank 11 – east)

The site at 16 Kiora Crescent contains a single storey brick warehouse, a metal shed (to be removed), concrete driveways and grassed areas. The warehouse contains offices and amenities, the shredder and conveyor for processing operations and storage areas.

#### 1.1.4 Production Process

The facility receives waste liquids and processes the liquid so suitably cleaned water is removed for discharge to trade waste and remaining sludges are sent offsite to a licenced waste contractor to be further processed, predominantly as grease trap waste. A detailed process flow diagram is provided in Figure 1-6.





The processes involved in the site operations are as follows:

1. Waste liquids are collected from sites throughout the Sydney Metropolitan Area. Most of the liquids are collected from special purpose tanks which separate the solid residues from the liquids, minimising the solids collected. The waste liquids are collected via vacuum tankers. The vacuum pump is mounted on the truck and runs on the truck's diesel engine. A flexible hose connected to the pump and tank intake transfers the liquid through the intake nozzle, hose assembly and then into the tank. A pressure valve allows the displaced air to be released to the atmosphere.
2. The liquids are delivered to the recycling facility. Vacuum trucks reverse into the unloading area located inside the building at 14 Kiora Crescent. Pallets of out-of-date liquid product/food waste for destruction are also delivered to the site and unloaded in the external area outside the building at 16 Kiora Crescent and immediately transferred inside the building.
3. A flexible hose connected to the outlet point of the tanker truck delivering to the building on 14 Kiora Crescent and is connected to a filter which removes any solids. The filtration devices are on wheels and can be manoeuvred such that a flexible hose connected to the outlet of the filter connected to any one of the tanks within the facility. Typically tanks on the eastern side of the facility (14 Kiora Crescent) are assigned to oily liquid wastes (grease trap waste (K110); waste oil/hydrocarbons mixtures/emulsions in water (J120); surfactants (M250)) and tanks on the western side of the facility store other organic liquid wastes such as stormwater/sewage sludge & residues (K130) and landfill leachates (N205).
4. Solids from the filters are manually transferred to a storage bin that once full is classified in accordance with waste guidelines and sent accordingly to a licenced landfill.
5. The waste liquids are pumped from the tankers using the main pump within the facility not the tanker pump, the liquids are pumped to a series of settling tanks and pipework at the facility. The main pumps flow direction and valves throughout the facility controls the movement of liquid waste depending on the operations which vary dependant on volumes of different wastes received.
6. Before final treatment, the majority of the waste liquid destined for trade waste is pumped from the storage tanks into the DAF (Dissolved air flotation) which separates the solid and remaining oil from the water.
7. Oil and sludge are transferred from the DAF to small storage tanks near the DAF. This is removed from site by a licenced waste contractor to be processed as grease trap waste.
8. Wastewater from the DAF is discharged to the Sydney Water sewer under a Trade Wastewater Agreement.
9. The pallets transferred to the 16 Kiora Crescent building where out-of-date liquids are fed onto a conveyor and shredded. The shredder removes the liquid from the packaging to be transferred into IBCs (1000 L container). Any packages unsuitable for handling are manually poured into IBCs. Packaging is recycled off-site. The liquid wastes are either sent offsite for reuse or further processed within the 14 Kiora Crescent Building.



### 1.1.5 Hours of Operation

The liquid waste processing facility operates 24 hours, seven days a week.

### 1.1.6 Allowable Limits

The development consent stipulates allowable limits for the receipt, processing and storage of wastes at the site as follows:

- Receipt and processing of no more than 100,000 tonnes of industrial liquid waste per year;
- Receipt and processing of no more than 10,000 tonnes combined of liquid product waste, liquid food waste, shoes, make up or clothes per year;
- Storage of no more than 377 tonnes of liquid waste at any one time (industrial liquid waste and liquid product waste) at the Liquid Waste Treatment Plant (LWTP) at 14 Kiora Crescent;
- Storage of no more than 100 tonnes (combined) of liquid product, liquid food waste, shoes, make up or clothes at any one time at Waste Processing Facility (WPF) at 16 Kiora Crescent; and
- No dairy products, including out-of-date dairy products can be received at the site.

## 1.2 OEMP CONTEXT

This OEMP has been prepared to identify environmental risks and legal obligations associated with day to day site operations and describes measures implemented to mitigate and managed these risks. The recent increase in allowable processing quantities and addition of product destruction activities at 16 Kiora Cres has been approved. Relevant environmental studies and approval documents include:

- *Benbow Environmental Pty Ltd, Environmental Impact Statement, Enviro Waste Services Group Pty Ltd, 14-16 Kiora Crescent, Yennora NSW, prepared by Benbow Environmental, November 2020;*
- *Development Consent under Section 4.38 of the Environmental Planning and Assessment Act, 1979, SSD-10407;*
- *Environment Protection Licence No 20444.*

Documentation relating to the project can be found on the major projects website at: <http://mpweb.planningportal.nsw.gov.au/major-projects/project/26156>

The OEMP has been prepared in accordance with Schedule 2, Part C, Conditions C1, C2, C3 and C4 of Schedule 2 of the Development Consent SSD-10407 as presented in the following tables.

Table 1-2: Development Consent SSD-10407 – Schedule 2, Part C, Conditions C2, C3 and C4

Condition	Section of Document Addressing Condition
C2. The Applicant must prepare an Operational Environmental Management Plan (OEMP) in accordance with the requirements of Condition C1 and to the satisfaction of the Planning Secretary.	This plan



Table 1-2: Development Consent SSD-10407 – Schedule 2, Part C, Conditions C2, C3 and C4

Condition	Section of Document Addressing Condition
<p>C3. As part of the OEMP required under Condition C2 of this consent, the Applicant must include the following:</p> <ul style="list-style-type: none"> <li>(a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</li> <li>(b) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>(ii) receive, handle, respond to, and record complaints;</li> <li>(iii) resolve any disputes that may arise;</li> <li>(iv) respond to any non-compliance;</li> <li>(v) respond to emergencies; and</li> </ul> </li> <li>(c) include the following environmental management plans: <ul style="list-style-type: none"> <li>(i) Traffic (see Condition B5) including Parking (see Condition B3);</li> <li>(ii) Waste (see Condition B12);</li> <li>(iii) Surface Water (see Condition B16); and</li> <li>(iv) Air Quality (see Condition B21).</li> </ul> </li> </ul>	<p>2.1</p> <p>2.3.2</p> <p>2.3.2.1.1</p> <p>2.3.2.4</p> <p>4.5</p> <p>2.5</p> <p>Sub-plan B1</p> <p>Sub-plan B2</p> <p>Sub-plan B3</p> <p>Sub-plan B4</p>
<p>C4. The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the OEMP is approved by the Planning Secretary; and</li> <li>(b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).</li> </ul>	<p>Section 1</p>



Table 1-3: Development Consent SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
<p>C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> <li>(a) detailed baseline data;</li> <li>(b) details of: <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures and criteria; and</li> <li>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> </li> <li>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>(d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the development; and</li> <li>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</li> </ul> </li> <li>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</li> <li>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</li> <li>(ii) complaint;</li> <li>(iii) failure to comply with statutory requirements; and a protocol for periodic review of the plan.</li> </ul> </li> </ul>	<p>4.1.1</p> <p>2.2</p> <p>Included in sub-plans</p> <p>Included in sub-plans</p> <p>3.3 and 4</p> <p>4.2</p> <p>Included in sub-plans</p> <p>4.4</p> <p>2.5.1 and 4.5</p> <p>2.3.2.1.1</p> <p>4.6</p>
<p><b>Note:</b> the Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	
<p>C5. Within three months of:</p> <ul style="list-style-type: none"> <li>(a) the submission of a Compliance Report under Condition C11;</li> <li>(b) the submission of an incident report under Condition C7;</li> <li>(c) the submission of an Independent Audit under Condition C13;</li> <li>(d) the approval of any modification of the conditions of this consent; or the issue of a direction of the Planning Secretary under Condition A2(b) which requires a review,</li> </ul> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing that a review is being carried out.</p>	<p>4.6</p>



Table 1-3: Development Consent SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
C6. If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.	4.6
<b>Note:</b> This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	

The OEMP also includes the following sub-plans:

- Sub-Plan B1: Operational Traffic Management Plan and Parking Strategy;
- Sub-Plan B2: Waste Management Plan;
- Sub-Plan B3: Surface Water Management Plan; and
- Sub-Plan B4: Air Quality and Odour Management Plan.

### 1.2.1 Consultation

A draft OEMP was prepared for review by the Proponent and the report now been finalised for submission to the DPIE for approval.

## 1.3 OBJECTIVES OF THE EMP

The objectives of the EMP are:

- To ensure all Enviro Waste personnel are aware of the legal requirements and responsibilities pertaining to environmental management related to all site operations covered by this OEMP;
- To identify and manage environmental aspects associated with the site operations by implementing a monitoring plan;
- To ensure personnel are aware of their responsibilities and are competent in implementing the specific environmental safeguards that apply to their activities;
- To ensure that review processes are incorporated into the plan to reaffirm continual improvement;
- To ensure all relevant legislation is complied with; and
- To minimise any environmental harm as a result of the site operations.

In addition to these objectives, it shall be the aim of senior management to change and improve the OEMP with the updating of environmental legislation, the development of new practices and



technology, and following any complaints or incidents. The OEMP should be updated to reflect such changes.

#### **1.4 ENVIRONMENTAL POLICY**

Values and environmental commitments have been formalised in an Environmental Policy, provided as Attachment A5. This policy is considered integral to the way the company conducts itself and has been incorporated into all operations and functions of the business.



## 2. ENVIRONMENTAL MANAGEMENT

### 2.1 ENVIRONMENTAL MANAGEMENT STRUCTURE & RESPONSIBILITY

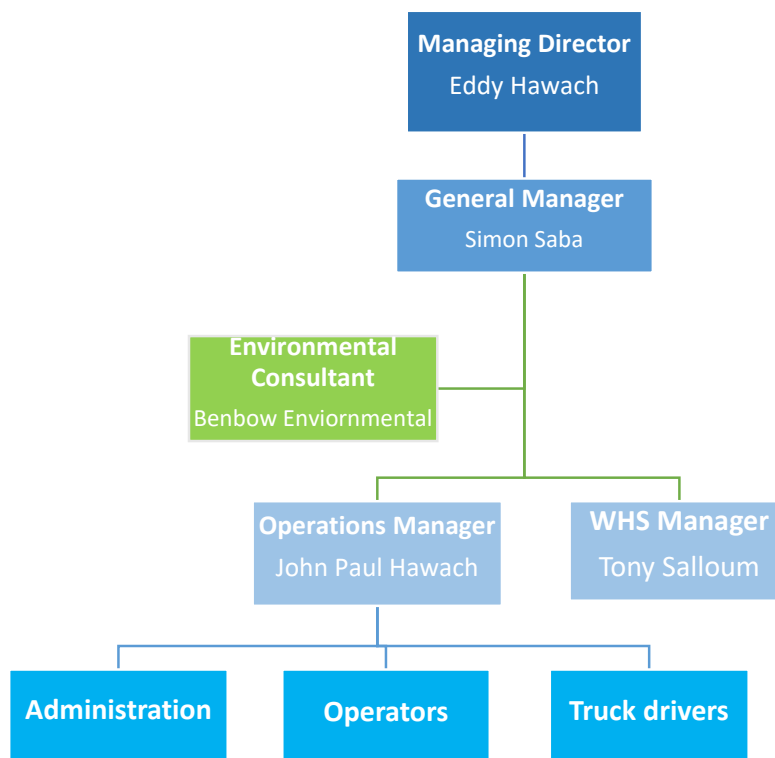
Key roles and responsibilities for protecting the environment and implementing environmental procedures are provided in Table 2-1. The structure of these roles is provided in Figure 2-1.

Table 2-1: Key Roles & Responsibilities

Role/Position	Responsibilities
Managing Director	<ul style="list-style-type: none"> <li>Ensure the company environmental policy is implemented in the OEMP for the site.</li> <li>Ensure adequate resources are available in order to implement and maintain the OEMP.</li> <li>Ensure all legal requirements are met.</li> <li>Monitor overall OEMP performance.</li> </ul>
General Manager	<ul style="list-style-type: none"> <li>Implement OEMP within the day to day operations of the facility.</li> <li>Ensure all employees including personnel and contractors are aware of their responsibilities under the OEMP.</li> <li>Ensure all training required under the OEMP is carried out.</li> <li>Ensure all records required under the OEMP are maintained.</li> <li>Ensure all monitoring requirements under the OEMP are undertaken.</li> </ul>
Operations Manager	<ul style="list-style-type: none"> <li>Implement OEMP across all functions and maintenance areas of the site.</li> <li>Manage changes to the OEMP across site operations.</li> <li>Ensure responsibilities of others are delegated and understood.</li> <li>Implement corrective and preventative actions as required.</li> <li>Implement any required mitigation measures and ensure these are maintained in good working order.</li> </ul>
WHS Manager	<ul style="list-style-type: none"> <li>Implement OEMP across all business functions.</li> <li>Maintain OEMP documentation including updating changes to business activities, legislation, procedures, objectives, targets and programmes and training. Report any document changes to the Operations Manager.</li> <li>Delegate tasks to other staff members in order to achieve objectives and implement OEMP programs.</li> <li>Annually review and update the OEMP or delegate to other suitably qualified person/s.</li> <li>Provide appropriate training relating to environmental management and assess staff's competence.</li> </ul>
Environmental Consultant (Delegated independent professional)	<ul style="list-style-type: none"> <li>Provide timely advice in regard to deadlines and requirements under the OEMP;</li> <li>Update documentation as requested in accordance with relevant requirements;</li> <li>Undertake monitoring as per conditions of consent where requested by Enviro Waste Personnel.</li> </ul>

Role/Position	Responsibilities
All Personnel and Contractors	<ul style="list-style-type: none"> <li>• Undertake any delegated OEMP tasks to enable effective implementation of the EMP.</li> <li>• Carry out work activities in accordance with the OEMP and procedures.</li> <li>• Be aware of all environmental responsibilities and legal requirements under the OEMP.</li> <li>• Undertake work activities in accordance with the OEMP and relevant procedures.</li> <li>• Inform Operations or WHS Manager of any issues with implementing the EMP, corrective and/or preventative actions required or amendments needed as soon as practicable.</li> </ul>

Figure 2-1: Organisational Structure Chart



## 2.2 APPROVAL & LICENSING REQUIREMENTS

The legal requirements that affect the operation of this site include any legislation which relates to activities or potential environmental impacts of the operations.

The following federal and state acts and associated regulations are key legislation pertaining to the environmental management of the site:

- Protection of the Environment Operations Act, 1997 (POEO Act);
- Environmental Planning and Assessment Act, 1979 (EP&A Act); and
- Work Health and Safety Act, 2011 (WHS Act).



Note that changes to legislation or regulations during operations would require a corresponding change to the EMP and specific procedures. Visit <http://www.legislation.nsw.gov.au/> for further details.

All licences, permits and approvals required for the project are also presented.

A register of legal, approval and licensing requirements for the facility is provided in Attachment A1. Changes to legislation or regulations may require a corresponding change to the OEMP.

Affected procedures would need to be modified accordingly.

### **2.2.1 Licences, Permits & Approvals**

Attachment A1 contains a list of environmental licences, permits and approvals that are required for the site operations. This list needs to be maintained by the Managing Director or delegate and should be reviewed at regular intervals.

### **2.2.2 Consent Conditions**

The consent conditions were issued by DPIE on 26 November 2021, Approval SSD-10407. Conditions under the approval that apply to the site and are relevant to environmental issues are listed in Attachment A1 and considered throughout this EMP.

### **2.2.3 Environmental Protection Licence**

The site holds an EPL licence (20444) for waste processing (non-thermal treatment). Variation of the EPL was approved by the NSW EPA. Conditions of the varied EPL have been included in the table in Attachment A1 and addressed throughout this OEMP.

## **2.3 REPORTING**

### **2.3.1 Reporting Requirements**

The reporting requirements for the project are included in the EPL and development consent. These are summarised in the table below and are described in the following sub-sections.



Table 2-2: Summary of Reporting Requirements

Report Name	Required By	Submit to	Due Date
Annual Return	EPA under condition R1 of the EPL	EPA eConnect	Within 60 days of end of reporting period. (Before 11 September each year)
Notification of environmental harm	EPA under condition R2 of the EPL	EPA	Within 7 days of date on which they became aware of the incident
Odour Audit Report and response to recommendations	Planning Secretary under SSD-10407 Condition B25	Planning Secretary	Within 6 months of commissioning the odour audit required by Condition B24 (due no later than 6 months after commencement of the development) Approx report due date: January 2023
Incident reporting	Planning Secretary under SSD-10407 Condition C7	Via major projects website	in writing immediately after the applicant becomes aware of an incident.
Non-compliance reporting	Planning Secretary under SSD-10407 Condition C8, C9 and C10	Via major projects website	in writing within 7 days after the applicant becomes aware of the non-compliance.
Compliance Reporting	Planning Secretary under SSD-10407 Condition C11 and C12	Planning Secretary	Within 3 months after first year of operation and in the same month each subsequent year. First report due: Approx. April/May 2023
Independent Environmental Audit Report	Planning Secretary under SSD-10407 Condition C13	Planning Secretary	Every 3 years. First Report due approx. April/May 2023. Make publicly available within 60 days of submitting to Planning Secretary. Notify Planning Secretary in writing 7 days before making report publicly available.
Audit Report Response	Planning Secretary under SSD-10407 Condition C14	Planning Secretary	Submit response with audit report. Make response publicly available within 60 days of submitting to Planning Secretary. Notify Planning Secretary in writing 7 days before making report publicly available.

### 2.3.1.1 Annual Return Documents

Annual return documents are required under EPL 20444. Annual Return documents are due at the end of each reporting period and must be prepared in respect of each reporting period. The

reporting period for Enviro Waste is 14 July to 13 July. The report must be supplied to the EPA via eConnect or registered post no later than 60 days after the end of the reporting period.

The annual return includes:

- A statement of compliance;
- A monitoring and complaints summary;
- A statement of compliance – licence conditions;
- A statement of compliance – load based fee;
- A statement of compliance – Requirement to prepare Pollution Incident Response Management Plan;
- A statement of compliance – Requirement to publish Pollution Monitoring Data; and
- A statement of compliance – Environmental Management Systems and Practices.

A copy of the Annual Return must be retained for at least 4 years.

The statement of compliance within the Annual Return must be certified and the Monitoring and Complaints Summary must be signed by either the licence holder or a person approved in writing by the EPA to sign on behalf of the licence holder.

#### **2.3.1.2 Notification of Environmental Harm Report**

Environmental harm must be notified by telephoning the Environment Line on 131 555. Details of actions to be taken in the event of a pollution incident are included in Section 2.5.1.

Written details of the notification must be provided to the EPA within 7 days of the date on which you become aware of the incident.

The report should include:

- a) the cause, time and duration of the event;
- b) the type, volume and concentration of every pollutant discharged as a result of the event;
- c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
- d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
- e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
- f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- g) any other relevant matters

#### **2.3.1.3 Odour Audit Report**

An odour audit report is required under Conditions B24 and B25 of the development consent. The audit must be conducted no later than 6 months after commencement of the development and the report must be submitted to the Planning Secretary within 6 months of commissioning of the odour audit.



The report should include:

- A summary of odour complaints and any actions that were carried out to address the complaints;
- Comparison of odour emissions to impact predictions in the EIS and RtS;
- Review of the design and management practices against industry best practice for odour management; and
- An action plan identifying and prioritising odour mitigation measures necessary to reduce emissions.

#### **2.3.1.4 Incident Notification and Reporting**

Incidents must be notified and reported in writing via the Major Projects Website immediately after becoming aware of an incident.

The following must be reported in writing:

- Identify the development – development application number: SSD-10407, name of the development: Yennora Liquid Waste Facility
- Location and nature of the incident

#### **2.3.1.5 Non-compliance Notification**

Non-compliances (not including incidents) need to be notified in writing via the Major Projects Website within 7 days after becoming aware of the non-compliance.

The following must be reported in writing:

- Identify the development – development application number: SSD-10407, name of the development: Yennora Liquid Waste Facility
- The condition of consent that the development is non-compliant with
- The way in which it does not comply
- Reasons for the non-compliance
- Actions that have been (or will be) taken to address the non-compliance

#### **2.3.1.6 Compliance Reporting**

A compliance report that reviews the environmental performance of the development must be prepared and submitted to the Planning Secretary within 3 months after the first year of operation and in the same month each subsequent year.

The compliance report must be prepared in accordance with the *Compliance Reporting Post Approval Requirements* (Department 2020) and include:

- identify any trends in the monitoring data over the life of the development;
- identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and
- describe what measures will be implemented over the next year to improve the environmental performance of the development.



The report must be made publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary 7 days before this is done.

### **2.3.1.7 Independent Audit Report & Response**

An independent environmental audit must be undertaken every 3 years. The first audit is due within one year of commencement of operations. The audit must be conducted by a suitably qualified experienced and independent team of experts endorsed by the Planning Secretary.

The report must be prepared in accordance with the *Independent Audit Post Approval Requirements* (Department 2020) and be submitted within 3 months of commissioning of the audit.

A guide to the contents of the audit report includes:

- Version control;
- Background to the project;
- Details of the audit team;
- Audit objectives, scope and period covered by the audit;
- Audit methodology;
- Details of site inspections and interviews with personnel and consultation undertaken;
- Audit findings; and
- Recommendations and opportunities for improvement including an action plan and timeframe for completion of actions.

A response to the audit report needs to be provided and submitted to the Planning Secretary. This needs to include a timetable for the implementation of recommendations.

Both the audit report and response need to be made publicly available no later than 60 days after submission to the Planning Secretary.

### **2.3.2 Communication Protocols**

The Managing Director and/or General Manager would communicate with relevant stakeholders when required. Stakeholders may include community groups, sub-contractors, regulatory authorities, non-regulatory agencies and the State Government.

#### **2.3.2.1 Community Relations**

It is important to foster open communications with the other stakeholders of the site to ensure that an integrated approach is used to deal with issues which reflect on all stakeholders. Regular communications with adjacent facilities should be undertaken to ensure any environmental management issues from either party are addressed promptly.

Required documentation relating to environmental performance including monitoring results will be posted to the website at: <https://www.envirowaste.com.au/>



#### **2.3.2.1.1 Complaints Response**

All complaints or enquiries should be handled in a courteous manner. Every complaint is a potential opportunity for improvement in environmental management. A procedure for handling complaints is provided below:

- Record in Register and on a Complaint Response Form:
  - ▶ Name of Complainant;
  - ▶ Address;
  - ▶ Telephone Number; and
  - ▶ Details of Complaint: date, time of occurrence, precise location of event.
- Connect/refer caller to one of the following staff members who are authorised to discuss the complaint with the caller:
  - ▶ Managing Director/s; and
  - ▶ Personnel with environmental responsibilities.
- Authorised staff member requests details of the complaint or information required by the caller and completes the Complaint Response Form and the Complaint Register (Attachment A3).
- Complaint is investigated and discussed at a toolbox meeting to determine whether it warrants being added to the incident register and whether a more detailed investigation is required.
- If no investigation is warranted, the complaint can be closed out.
- Any response, investigations and actions taken to rectify the issue are recorded in the complaint register.

Complaints records must be maintained for 4 years.

#### **2.3.2.1.2 Telephone Complaints Line**

A telephone complaints line has been set up for the purpose of receiving any complaints from members of the public.

This number is stipulated on the company website and is:

\*\*\*\*\*0467 777 646\*\*\*\*\*

#### **2.3.2.2 Regulatory Authorities**

Communications with regulatory authorities, such as the Department, EPA or local council, shall occur on an as-needed basis. All communication with regulatory authorities concerning environmental matters is to be noted and records of any subsequent actions appropriately filed.



### **2.3.2.3 Internal Communication**

The site management is to establish simple yet effective communication channels for implementation of the OEMP. Typical methods of communication that may suit the size of the operation include the Regular Site Meetings or Toolbox Talks with formal records.

Document control and written communication including emails would be necessary when new contractors or employees are trained or changes are made to the OEMP or any other matters that affect the holistic environmental management of the site.

#### **2.3.2.3.1 Regular Site Meetings/Toolbox Talks**

Site meetings/Toolbox talks would be undertaken monthly. In addition to safety aspects, the agenda for the meetings should include the following environmental components:

- Any environmental spills, incidents or complaints;
- Results of any environmental monitoring undertaken; and
- Outcomes of the Workplace Inspection.

### **2.3.2.4 Dispute Resolution**

Disputes would be resolved using the following as a guide:

1. Identify key issues behind the dispute including events that occurred before the dispute and clarify any misunderstandings; Ensure any contractual obligations are understood.
2. Engage in communications with the other party to attempt to resolve the dispute and keep a record of any communication or discussions undertaken.
3. Prepare written details of the concerns before taking further actions.
4. If attempts at resolving the issue are unsuccessful seek expert third party advice.

### **2.3.3 Document Control**

Records relating to non-conformances, and their corrective and/or preventive action request forms, are maintained by site management. Other types of records, such as environmental monitoring results or correspondence between any regulatory authorities, shall also be maintained by site management.

These records would be kept in the office on site and would be compiled, as access to these records may occasionally be required by stakeholders and by regulatory authorities.

Reports and records concerning any environmental audits and regular inspections of the operations should also be maintained and archived.

## **2.4 ENVIRONMENTAL TRAINING**

Environmental training is essential for all staff working at the site to ensure that the environmental aspects of the site activities, and their management, are understood.



Training of staff will need to be assessed on a periodic basis, while contractors would be assessed on a job-by-job basis. It is recommended that environmental training be included as part of the site induction and revisited annually. Two separate site induction training programs need to be developed – one for Employees and one for Contractors.

This training shall be conducted by site management prior to those persons carrying out their works on site.

#### **2.4.1 Site Induction**

All employees must have successfully completed the site induction training prior to starting work at the site. Employee site induction training would contain an environmental component that would cover the following areas:

- How to communicate and respond in an emergency situation, who to contact and what assistance is available.
- Where to go in an emergency, how to evacuate to a safe location and who will co-ordinate an evacuation.
- Incident response and reporting requirements.
- Aspects of the site operations and how these could potentially impact on the environment.
- Awareness of potential impacts of staff work activities and the environmental benefits of improved personal performance.
- Awareness of the corporate environmental policy and objectives of the site EMP.
- Awareness of legal requirements and individual accountability under environmental legislation applicable to the site, including penalties for offences under environmental legislation.
- How the potential impacts are managed on site – including monitoring, site inspections and any regular maintenance undertaken.
- Understanding of the various roles and responsibilities, with relevant procedures; e.g.: Administration staff should understand how the complaints register is implemented, and Staff responsible for daily site operations should be trained in any inspection checklists and how to follow up on any non-conformances.

Shortfalls could be addressed in toolbox talks or by specific on-site training.

#### **2.4.2 Training for Contractors**

Contractors would be physically inducted by the Site/Operations Manager, who would provide a tour of the site and outline site policy, procedures, and scope of works during the tour. Also included in the site induction for contractors would be where to go in the event of an emergency, how to evacuate to a safe location and who will co-ordinate an evacuation.

#### **2.4.3 Specific Environmental Training**

Specific environmental training should be arranged for any environmental matters that need to be communicated to employees. These would be organised on an as needs basis and be undertaken by a qualified third party and where required include:

- Forklift driver training
- Spill kit training – in how to use contents of a spill kit



- Emergency plan and emergency response including firefighting techniques and first aid where appropriate
- Hazardous material training – to ensure staff can recognise and handle any hazardous or other prohibited waste.

#### **2.4.4 Training Register**

At the completion of the site induction, all employees and contractors must sign a document stating that they understand and agree to abide by the site's procedures.

Details of all environmental training programs need to be recorded. A training register has been provided as a form in Attachment A3.

### **2.5 EMERGENCY CONTACTS & RESPONSE**

Emergency and pollution incident situations shall be dealt with in accordance with the site-specific Emergency Plan (EP) and Pollution Incident Response Management Plan (PIRMP).

These plans identify potential emergency situations that may have an impact on the environment and details how to respond to them. The site-specific EP has been provided by Benbow Environmental. Additionally, as per Clause 153A of the POEO Act, Enviro Waste Services are required to maintain a Pollution Incident Response Management Plan (PIRMP). The PIRMP (as well as the EPL) can be viewed on the Enviro Waste Services website:

<https://www.envirowaste.com.au/compliances/>

An Emergency Control Organisation (ECO) has been established for the site and consists of a group of personnel that has the responsibility of providing first response action to an emergency in terms of organising the necessary resources, communications, evacuation of personnel and implementing any corrective actions that may be necessary to return the emergency situation back to normal. The same applies for a pollution incident. Specific details of the ECO are provided in the Site's Emergency Plan.

The 24 hour contact person for emergencies at the site is:

**Name: Simon Saba**  
**Mobile: 0467 777 646**

#### **2.5.1 Response Actions for Pollution Incidents**

In the event of a pollution incident, the site's Pollution Incident Response Management Plan should be implemented. The first response of personnel on site based on their initial assessment is to phone 000 in an emergency.

Initial assessment needs to be made by ECO members present on site. If safe to do so:

1. Remove all persons from immediate danger
2. Secure the area
3. Commence evacuation



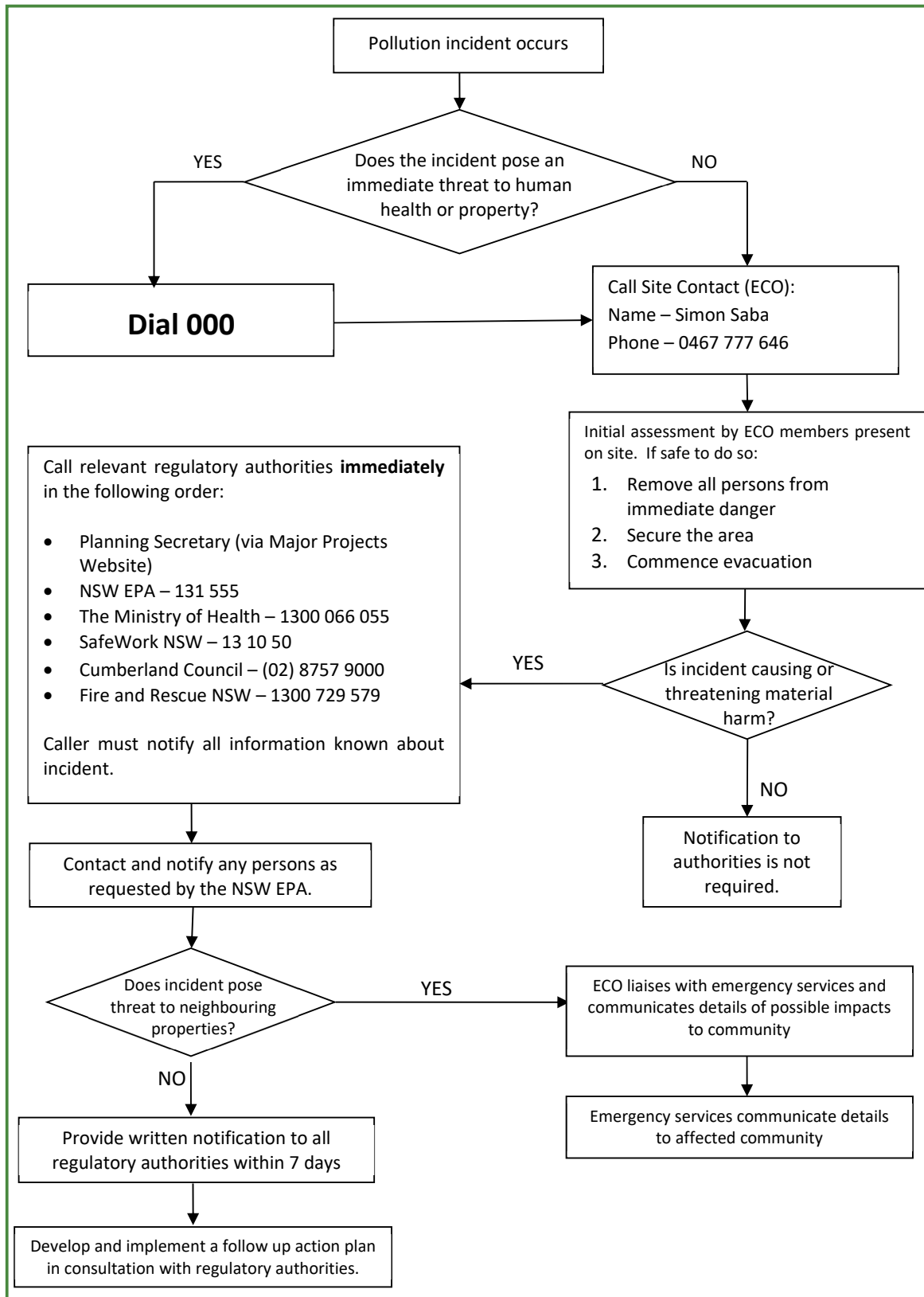
Under Part 5.7 of the POEO Act, a pollution incident that occurs in the course of an activity so that material harm to the environment is caused or threatened must be notified immediately to relevant authorities.

If the incident presents an immediate threat to human health or property, call 000 immediately. If the incident does not require emergency services, notify the following regulatory bodies, in order of relevance, as follows:

- |   |  |
|---|--|
| 1. DPIE (Planning Secretary)            | in writing via the Major Projects Website    |
| 2. NSW Environment Protection Authority | 131 555                                      |
| 3. The Ministry of Health               | 1300 066 055 (ask for Public Health Officer) |
| 4. SafeWork NSW                         | 13 10 50                                     |
| 5. Cumberland Council                   | (02) 8757 9000                               |
| 6. Fire and Rescue NSW                  | 1300 729 579                                 |

A simple flowchart detailing how to respond in the event of a pollution incident is provided as Figure 2-2.

Figure 2-2: Response Plan for Pollution Incident







### 3. IMPLEMENTATION

#### 3.1 RISK ASSESSMENT

A register of environmental aspects and potential impacts is provided as Attachment A2. A risk assessment was undertaken on each identified potential impact to determine its significance using a risk rating based on the likelihood and consequence descriptors. The risk assessment methodology used by Enviro Waste is provided in the sub-sections that follow.

Mitigation measures were considered in the register.

##### 3.1.1 Risk Assessment Methodology

The methodology described in the following sections was used in assessing the risks associated with site activities.

The following sub-section defines the risk criteria used in this assessment.

##### 3.1.1.1 Consequence Estimation

Consequence descriptor is used to quantify the potential on-site and off-site impacts in terms of environmental, health and financial impacts. A guideline used for consequence is described in Table 3-1.

Table 3-1: Consequence Table

Level	Descriptor	Consequences Or Impact Description
1	Insignificant	Confined on-site environmental impacts able to be promptly rectified. No injuries. Financial loss less than \$2,000.
2	Minor	Confined environmental impacts requiring short term recovery with potentially little or no off-site impacts. First Aid treatment. Financial loss \$2,000 to \$20,000.
3	Moderate	Confined environmental impacts requiring medium term recovery both on-site and off-site. Medical treatment required. Financial loss \$20,000 to \$200,000,
4	Severe	Unconfined environmental impacts requiring long term recovery and leaving residual damage both on-site and off-site. Extensive injuries, loss of product capability. Financial loss \$200,000 to \$1M.
5	Catastrophic	Widespread environmental impact requiring long term recovery and leaving major damage both on-site and off-site. Death. Financial loss more than \$1M.

##### 3.1.1.2 Likelihood Estimation

This aspect involves determining how likely an event is to occur. Likelihood is the chance that something might happen and is defined for the purposes of this assessment in Table 3-2.

### 3.1.1.3 Level of Risk

The level of risk is defined by Table 3-2.

Table 3-2: Level of Risk Table

			Consequence				
			Insignificant 1	Minor 2	Moderate 3	Severe 4	Catastrophic 5
Likelihood	5 -	Almost certain to occur in most circumstances	High (H)	High (H)	Extreme (X)	Extreme (X)	Extreme (X)
	4 -	Likely to occur frequently	Moderate (M)	High (H)	High (H)	Extreme (X)	Extreme (X)
	3 -	Possible and likely to occur at some time	Low (L)	Moderate (M)	High (H)	Extreme (X)	Extreme (X)
	2 -	Unlikely to occur but could happen	Low (L)	Low (L)	Moderate (M)	High (H)	Extreme (X)
	1 -	May occur but only in rare and exceptional circumstances	Low (L)	Low (L)	Moderate (M)	High (H)	High (H)



Table 3-3: Risk Rating Table

<b>Extreme (7 or greater)</b>	<p>Act immediately to mitigate the risk. Either eliminate, substitute or implement engineering control measures.</p> <p><i>Long term environmental damage (5+ years)</i></p>	<p>Remove the hazard at the source. An identified extreme risk does not allow scope for the use of administrative controls or PPE, even in the short term.</p>
<b>High (6 or 7)</b>	<p>Act immediately to mitigate the risk. Either eliminate, substitute or implement engineering control measures.</p> <p>If these controls are not immediately accessible, set a timeframe for their implementation and establish interim risk reduction strategies for the period of the set timeframe.</p> <p><i>Medium term environmental damage</i></p>	<p>An achievable timeframe must be established to ensure that elimination, substitution or engineering controls are implemented.</p> <p><b>NOTE:</b> Risk (and not cost) must be the primary consideration in determining the timeframe. A timeframe of greater than 6 months would generally not be acceptable for any hazard identified as high risk.</p>
<b>Medium (5)</b>	<p>Take reasonable steps to mitigate the risk. Until elimination, substitution or engineering controls can be implemented, institute administrative or personal protective equipment controls. These “lower level” controls must not be considered permanent solutions. The time for which they are established must be based on risk. At the end of the time, if the risk has not been addressed by elimination, substitution or engineering controls a further risk assessment must be undertaken.</p> <p><i>Short Term environmental damage</i></p>	<p><b>Interim measures until permanent solutions can be implemented:</b></p> <ul style="list-style-type: none"> <li>• Develop administrative controls to limit the use or access.</li> <li>• Provide supervision and specific training related to the issue of concern.</li> </ul>
<b>Low(&lt; 5)</b>	<p>Take reasonable steps to mitigate and monitor the risk. Institute permanent controls in the long term. Permanent controls may be administrative in nature if the hazard has low frequency, rare likelihood and insignificant consequence.</p> <p><i>Environmental Damage which can be corrected.</i></p>	

## **3.2 SIGNIFICANT ASPECTS & IMPACTS**

The risk assessment identified the following potential significant aspects and impacts in the EAR provided as Attachment A2:

- Dust and odour emissions;
- Noise emissions;
- Contamination to stormwater;
- On-site traffic congestion and conflict; and
- Waste management.

Mitigation measures, environmental controls and procedures/plans have been put in place to minimise the potential for identified aspects to impact on the surrounding environment.

## **3.3 ENVIRONMENTAL MANAGEMENT ACTIVITIES AND CONTROLS**

This section provides details of mitigation measures implemented at the site.

### **3.3.1 Air and odour**

Maintain existing air and odour mitigation controls including:

- Biotrickling filter system;
- Vertical dispersion stack, 6m above roofline;
- Indoor operations; and
- Deodoriser.

Maintain existing greenhouse gas reduction measures on site:

- Utilising electric equipment where practical; and
- Installation of LED lights.

#### **3.3.1.1 Biotrickling filter system**

All displaced air from tank filling is vented through an existing biotrickling filter (supplied by Gebel Tanks). The biotrickling filter system uses a packed bed consisting of porous material that bacteria affix to and create a biomass film, this film degrades pollutants that are transferred to the packed bed as the air/gas is transported through the material.

The biotrickling filter system is maintained by Enviro Waste. This is undertaken on a monthly basis and includes system checks and replacement of filters.

#### **3.3.1.2 Stack**

From the biotrickling system the site discharges the filtered air vertically through a stack 6m above the roofline.

### **3.3.1.3 Building**

All liquid waste handling occurs within the building, reducing odour impacts from fugitive emissions.

### **3.3.1.4 Deodoriser**

There are 5 existing deodoriser spray points in the facility. Two are positioned at the top of the front roller door and spray inwards, two more in on the back wall of the facility pointed towards the filtering/screening process, and one positioned directly above the DAF plant.

The deodoriser system sprays every 15 minutes.

### **3.3.2 Operational Noise**

The following noise management practices are implemented for good practice:

- Ensure regular maintenance of noisy machinery so that noise limits are not exceeded at the nearest sensitive receivers.
- Prohibition of extended periods of on-site revving/idling;
- Keeping the roller shutter door closed where possible;
- Minimisation of the use of truck exhaust brakes on site;
- Enforcement of low on-site speed limits; and
- On-site vehicles and machinery to be maintained in accordance with a preventative maintenance program to ensure optimum performance and early detection of wearing or noisy components.

### **3.3.3 Water**

- Maintain isolation of on-site stormwater system including captured site stormwater water processed through the facility;
- Fully sealed site;
- Bunded tanks and operational areas maintained to relevant Australian Standards;
- Blind sump pits located within bunded areas;
- Undertake Daily site cleaning;
- Regular clearing and maintenance of blind sump pits;
- Regular workplace inspection and high standard of housekeeping;
- Maintain segregated and designated waste bays and bins; and
- Installation of 3 slim-line water tanks.

### **3.3.4 Waste**

- Dedicated waste storage tanks;
- Licenced waste contractors for collection;
- No stockpile storage on site.
- All solid waste will be stored in bins.
- All liquid waste will be stored in bulk tanks, IBCs, or containers.
- Waste minimisation and resource recovery practices implemented;
- Regular waste audits;
- Continual improvement of waste minimisation and resource recovery practices.



- Incoming waste procedure included in WMP. This will include:
  - Testing of all bulk liquid waste prior to collection and after receipt.
  - Reject all non-conforming waste

### **3.3.5 Hazard and risk**

- Chemical storage in accordance with relevant Australian Standards;
- Control of ignition sources, including “no smoking” policy;
- Adequate provision for escape;
- Adequate fire services;
- Install bunding for the storage of liquid waste, dangerous Goods/hazardous chemicals and combustible liquids in accordance with the relevant Australian Standards;
- Maintain spill controls including bunding and spill clean up equipment within spill kits;
- Building security;
- Employee training where relevant including:
  - Forklift driver training;
  - Spill kit training
  - Emergency plan and emergency response training including firefighting techniques.

#### **3.3.5.1 Human health**

- Ensure all external areas are kept tidy and free of items and debris to facilitate movement of vehicles on site and minimise potential pollution;
- Use of Personal Protective Equipment;
- Undertake occupational health assessments if required;
- Regular workplace inspection and high standard of housekeeping;
- Regular program of equipment inspection and maintenance.

#### **3.3.5.2 Parking Measures**

Enviro Waste is committed to parking measures as detailed in the operational traffic management plan and parking strategy provided as Sub-Plan B1 of this OEMP.

## **3.4 ENVIRONMENTAL CONTROL MAPS**

Site and floor plans as well as maps showing the location of environmentally sensitive areas, nearest waterways, on-site traffic details and monitoring locations are provided as Attachment A6.

## **3.5 ENVIRONMENTAL SCHEDULES**

Management plans are provided as sub-plans and include:

- Sub-Plan B1: Operational Traffic Management Plan and Parking Strategy;
- Sub-Plan B2: Waste Management Plan;
- Sub-Plan B3: Surface Water Management Plan; and
- Sub-Plan B4: Air Quality and Odour Management Plan.

A waste register is included in the waste management plan.



A set of environmental procedures has been compiled and provided as Attachment A4. These procedures are a pragmatic way for staff and contractors carry out activities in an environmentally responsible way and ensure this EMP is adequately implemented.

Attachment A4 includes environmental procedures for the following:

- Spill Procedure
- Site Inspection Checklist

Likewise, a set of records and forms associated with the environmental management of the site are also provided as Attachment A3. These registers and forms include:

1. Environmental Training Register
2. Incident Reporting Forms and Register
3. Complaints Forms and Register
4. Corrective and Preventative Actions Form

## **4. MONITORING AND REVIEW**

This section details the monitoring required at the site.

### **4.1 ENVIRONMENTAL MONITORING**

Environmental monitoring is used to check the performance of the operation against regulatory standards and planning initiatives. Records of all environmental monitoring and results are kept on the site and monitoring results required under the EPL need to be made available on the website.

#### **4.1.1 Baseline Data**

Baseline data is included in relevant sub-plans.

#### **4.1.2 Air emissions monitoring**

The WH&S Manager shall be responsible for ensuring annual air emissions monitoring is undertaken on the biotrickling filter system stack as per EPL 20444. The stack is required to be monitored for benzene and Volatile Organic Compounds (VOCs) as n-propane. Details are provided in Sub-Plan B4: Air Quality and Odour Management Plan.

#### **4.1.3 Waste Monitoring**

Records of the quantity, type and source of waste received and outputs produced on site are required to be maintained under SSD-10407, Condition B12(b) as per Sub-Plan B2: Waste Management Plan.

#### **4.1.4 Surface Water Monitoring**

Stormwater is to be monitored in accordance with Sub-Plan B3: Surface Water Management Plan as required by SSD-10407, Condition B16(c).

#### **4.1.5 Regular Environmental Inspections**

Enviro waste committed to undertaking regular environmental inspections of the site as referenced in Appendix 2 of SSD-10407. A regular inspection checklist is provided in Attachment A4. It is recommended these be undertaken weekly and a record of the completed checklists maintained. Any issues identified need to be included as a corrective action.

### **4.2 ENVIRONMENTAL MONITORING PLAN**

Environmental monitoring required is described in detail in the relevant monitoring and management plans as discussed in the previous section.

A recommended environmental monitoring plan summarising Enviro Waste Services monitoring requirements is presented as Table 4-1. The results from such monitoring are aimed at safeguarding the environment from long term degradation.



Table 4-1: Monitoring & Inspection Plan

Aspect	Requirement	Frequency / Due Date	Process / Plan	EPA Identification Points	Evidence
Air Emission Monitoring (Stack Testing)	EPL Conditions P1.1, L1.1 & M2.2	Points 1 – Annually Due: TBA	Stack testing to be undertaken by a suitably qualified consultant in accordance with Sub-Plan B4: Air Emission Management Plan and Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, and relevant requirements.	Point 1: Biotrickling filter system stack	Emission Testing Report
Surface Water Monitoring	SSD-10407, Condition B16(c)	Two on-site stormwater pits – Frequency TBA Due: TBA	Water quality monitoring and reporting to be undertaken by a suitably qualified consultant as per Sub-Plan B3: Surface Water Management Plan	N/A	Monitoring Report, Laboratory results
Waste Monitoring	SSD-10407, Condition B12(b)	Ongoing	Maintain records of quantity, type and source of waste received and outputs produced on site as per Sub-Plan B2: Waste Management Plan.	N/A	Waste records
Regular Environmental Inspections	SSD-10407, Appendix 2	Weekly	WH&S Manager or delegate to undertake weekly inspections of the entire site and complete the Weekly Inspection Checklist provided in Attachment A4. Issues identified should be discussed in Regular Toolbox talks / Safety Meetings and/or identified for corrective action.	N/A	Weekly Inspection Checklist Records

#### **4.2.1 Monitoring Records**

Monitoring records must be maintained in accordance with the EPL. Records must include:

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

All monitoring records are to be:

- Maintained in a legible form;
- Kept for at least 4 years after the monitoring or event to which they relate took place; and
- Produced in a legible form to any authorised officer of the EPA who asks to see them.

### **4.3 ENVIRONMENTAL AUDITING**

#### **4.3.1 Independent Environmental Audit**

Enviro Waste Services is required to engage an Environmental Consultant to undertake an Independent Environmental Audit every 3 years in accordance with Condition C123 of consent SSD-10407. The first independent environmental audit is expected to be conducted at the site in late 2022 and the second in 2025.

The Managing Director shall commission an independent Environmental Audit. Appointment of the independent auditor must be endorsed by the DPIE.

The audit must:

- Include consultation with EPA , Council and DPIE;
- Assess the environmental performance of the project and assess whether it's complying with the relevant requirements in the conditions approval and Environmental Protection License;
- Review the adequacy of strategies , plans or programs required under these approvals , and if appropriate; and
- Recommend measures or actions to improve the environmental performance of the project, and/or any assessment plan or program.

#### **4.3.2 Odour Audits**

Enviro Waste Services is required to carry out an Odour Audit no later than 6 months after commencement of operation of the development in accordance with Condition B24 of consent SSD-10407. Refer to Sub-Plan B4: Air Quality and Odour Management Plan.

The audit must:

- Be carried out by a suitably qualified experienced and independent person(s) and endorsed by the Planning Secretary;
- Audit the development in full operation;
- Include a summary of odour complaints and actions taken to address the complaints;
- Assess the operation against odour impact predictions in the EIS and RTS;



- Review design and management practices against industry best practice for odour management; and
- Include an action plan that identifies and prioritises any odour mitigation measures that may be necessary to reduce emissions.

#### **4.3.3 Waste Audits**

Enviro waste committed to undertaking regular waste audits and should include but not be limited to:

- Identification of waste types, storage location and quantities at each waste storage area;
- Review of waste monitoring records (quantities of incoming and outgoing waste) against requirements under the consent SSD-10407 and the EPL;
- Provide a breakdown of wastes stored at the site;
- Provide a breakdown of wastes received and sent out of the site; and
- Identify areas of improvement to waste management practices and potential resource recovery opportunities.

It is recommended the first waste audit be undertaken by an independent environmental consultant following the first year of operation. Details are provided in Sub-Plan B2.

#### **4.4 CONTINUAL IMPROVEMENT**

This OEMP facilitates continual improvement of the site operations in implementing the “Plan, do, check and act” model as follows:

- Plan: Identify opportunities and plan for change – through the risk assessment process.
- Do: implement the change – through the preventative and corrective actions process.
- Check: Use data to analyse the results of the change and determine whether it made a difference – through the monitoring and review process.
- Act: If the change was successful, implement it on a larger scale.

#### **4.5 CORRECTIVE AND PREVENTATIVE ACTIONS**

This section of the OEMP details non-conformance with the OEMP, and corrective and preventative actions. Non-conformances include errors and deficiencies that can be identified through the Inspection Checklist, Environmental Monitoring results and/or from any complaints received in relation to site activities. Non-conformances should be effectively logged and promptly resolved. Non-conformances are to be reviewed by site management who will coordinate the appropriate corrective and preventative actions to address the respective non-conformances. Site management will then inform any staff or contractors who are affected by significant non-conformances about the subsequent required actions.

Furthermore, any non-compliances must be reported in accordance with Section 2.3.1.5 of this OEMP.



#### **4.5.1 Request for Corrective Action**

Corrective Actions are an ideal way to demonstrate and account for any issues and improvements to the OEMP. A Corrective Action Request (CAR) should be issued and processed using the CAR form provided in Attachment A3. A CAR can be initiated by any staff member, and should be passed to the appropriate staff or contractors responsible for the source of the non-conformance. Different events often initiate a CAR being raised, some typical ones follow:

- Council, EPA or other regulatory agency direction or request;
- Detection of non-conformances during site inspection;
- Public complaints;
- Periodic meetings; and/or
- Environmental incident or near miss.

Site management shall ensure that CARs are actioned within a reasonable time frame. Records shall be maintained by the site management for all relevant corrective actions.

#### **4.6 OEMP REVIEW**

Throughout operation, certain circumstances may change and as a result, modifications and/or refinements to the OEMP may be required to ensure environmental controls and procedures remain applicable. Review of the OEMP and Sub-Plans is required under conditions C5 of consent SSD-10407 within 3 months of:

- a) The submission of a Compliance Report under Condition C11;
- b) The submission of an incident report under Condition C7;
- c) The submission of an independent environmental audit under Condition C13;
- d) The approval of any modification of the conditions of consent SSD-10407; or
- e) The issue of a direction of the Planning Secretary under Condition A2(b) which requires a review.

The reviews shall be undertaken by the Managing Director and/or delegate such as an external environmental consultant and would need to consider the following:

- Changes to site activities, raw materials and/or chemicals;
- Changes to legislation;
- Variations to licences, approvals, consents or permits;
- Any monitoring, inspection and audit results;
- Any pollution incidents or complaints; and
- The effectiveness of safeguards and controls.



Outcomes of the OEMP reviews may require modifications to the OEMP and related documentation. Any revisions would need to be submitted to the Planning Secretary for approval within 6 weeks of the review. Any changes would be communicated to personnel through toolbox talks.

Linda Zanotto  
Senior Environmental Engineer

R T Benbow  
Principal Consultant



## 5. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of Enviro Waste Services Group Pty Ltd, as per our agreement for providing environmental services. Only Enviro Waste Services Group Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by Enviro Waste Services Group Pty Ltd for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

## **ATTACHMENTS**







### Attachment A1: Legal and Other Requirements

Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Environmental Planning and Assessment Act 1979	All	All	Comply with project approval conditions (SSD-10407) as set out by the DPIE	Compliance with all conditions is required.
Protection of the Environment Operations Act 1997	Environmental Harm	S115 S116 S117	<p>The principal objective of the legislation is to avoid causing environmental harm. Harm is defined in the Act as being:</p> <p><i><b>“harm”, in relation to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above includes any act or omission that results in pollution.</b></i></p> <p><i><b>“Pollution” means:</b></i></p> <p>(a) water pollution, or</p> <p>(b) air pollution, or</p> <p>(c) noise pollution, or</p> <p>(d) land pollution.</p> <p>Clause 115 relates to the offence for wilful or negligent disposal of waste likely to harm the environment.</p> <p>Clause 116 relates to offences for wilful or negligent causing leaks, spills or escapes of substances likely to harm the environment.</p> <p>Clause 117 relates to offences for wilful or negligent emission of ozone depleting substances likely to harm the environment.</p>	<p>The implementation of the OEMP would ensure that the environmental impacts of the activities taking place on site are minimised.</p> <p>Safeguards and procedures would ensure that site operations avoid causing environmental harm or pollution.</p>



Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Water Pollution	S120 S123	<p>Clause 120 relates to the prohibition of pollution of waters: <i>A person who pollutes any waters is guilty of an offence.</i></p> <p>Clause 123 details the maximum penalty for water pollution offences. Tier 2 penalties apply. <i>A person who is guilty of an offence under this Part is liable, on conviction.</i></p>	<p>Applies.</p> <p>Safeguards exist to prevent waste/sediments entering the stormwater network and migrating off-site.</p> <p>A Surface Water Management Plan is provided in this OEMP.</p> <p>Responsibility extends to all employees. If found guilty of a water pollution offence, both the company and the individual can be held liable.</p>



Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Air Pollution and Odour	Part 5.4	<p>Clause 124 relates to the operation of plant (other than domestic plant):  <i>The occupier of any premises who operates any plant in or on those premises in such a manner as to cause air pollution from those premises is guilty of an offence if the air pollution so caused, or any part of the air pollution so caused, is caused by the occupier's failure:</i></p> <p style="padding-left: 40px;">(a) to maintain the plant in an efficient condition, or  (b) to operate the plant in a proper and efficient manner.</p> <p>Clause 125 relates to maintenance work on plant.  Clause 126 relates to dealing with materials.  Clause 128 relates to standards of air impurities not to be exceeded.  Clause 129 relates to the emission of odours from licensed premises.</p> <p>Clause 132 details the maximum penalty for air pollution offences. Tier 2 penalties apply.  <i>A person who is guilty of an offence under this Division is liable, on conviction</i></p>	<p>An Air Quality and Odour Management Plan addresses this clause.</p> <p>Responsibility extends to all employees. If found guilty of an air pollution offence, both the company and the individual can be held liable.</p>



Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Noise Pollution	S139 S140 S141	<p>Clause 139 relates to the operation of plant: <i>The occupier of any premises who operates any plant (other than control equipment) at those premises in such a manner as to cause the emission of noise from those premises is guilty of an offence of the noise so caused, or any part of it, is caused by the occupier's failure:</i></p> <p style="padding-left: 40px;"><i>(a) To maintain the plant in an efficient condition, or</i> <i>(b) To operate the plant in a proper and efficient manner.</i></p> <p>Clause 140 relates to dealing with materials: <i>The occupier of any premises who deals with materials in or on premises in such a manner as to cause the emission of noise from those premises is guilty of an offence if the noise so caused, or any part of it, is caused by the occupier's failure to deal with those materials in a proper and efficient manner.</i></p> <p>Clause 141 details the maximum penalty for noise offences. Tier 2 offences apply.</p> <p><i>A person who is guilty of an offence under this Part is liable, on conviction.</i></p>	<p>Applies.</p> <p>The main sources of noise are associated with truck movements</p> <p>Noise management is addressed in the OEMP and EAR.</p>
	Land Pollution	S142A	<p>Clause 142A relates to the pollution of land. Tier 2 penalties apply. <i>A person who pollutes land is guilty of an offence.</i></p>	<p>A Waste management plan is included in the OEMP.</p>



Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Waste	S88 S143 S144 S145	<p>Waste needs to be disposed of in a manner which does not create or is likely to create environmental harm.</p> <p>Clause 88 relates to waste facilities required to pay EPA contributions in respect of all waste received at the facility.</p> <p>Clause 143 relates to the unlawful transporting or depositing of waste:</p> <p><i>If a person transports waste to a place that cannot lawfully be used as a waste facility for that waste, or causes or permits waste to be so transported:</i></p> <p><i>(a) the person, and</i></p> <p><i>(b) if the person is not the owner of the waste, the owner, are each guilty of an offence.</i></p> <p>Clause 144 deals with the use of land as waste facility without lawful authority:</p> <p><i>(1) A person who is the owner or occupier of any land and who uses the land, or causes or permits the land to be used, as a waste facility without lawful authority is guilty of an offence.</i></p> <p><i>(2) In any proceedings for an offence under this section the defendant bears the onus of proving that there is lawful authority to use the land concerned as a waste facility.</i></p> <p><i>All waste must be classified in accordance with the EPA's Waste Classification Guidelines.</i></p>	<p>Any waste disposal required must be undertaken in accordance with the NSW EPA's <i>Waste Classification Guidelines</i>.</p> <p>All waste should be stored in an environmentally safe manner.</p> <p>False or misleading information regarding pollution incidents is an offence under the Act.</p>



Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
	Duty to notify pollution incidents	S148	<p>Clause 148</p> <p><i>Pollution incidents causing or threatening material harm to be notified.</i></p> <ul style="list-style-type: none"> <li><i>Kinds of incidents to be notified</i></li> </ul> <p><i>This Part applies where a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened.</i></p> <ul style="list-style-type: none"> <li><i>Duty of person carrying on activity to notify</i></li> </ul> <p><i>A person carrying on the activity must, immediately after the person becomes aware of the incident, notify each relevant authority of the incident and all relevant information about it.</i></p>	In the event of an incident, the duty to notify extends to all staff and contractors of the site. Staff and/or contractors are required to notify the employer. When management is not contactable, they are required to notify the relevant authorities. Refer to Reporting Requirements in Section 2.5.1 of the OEMP.
	Duty to prepare and implement pollution incident response management plans	S153A	<p>Clause 153A</p> <p><i>The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.</i></p>	The development undertakes scheduled activities, is the holder of an EPL and has therefore have implemented a PIRMP.
	Control equipment	S167	Clause 167 relates to the responsibility of the occupier of any premises to maintain and operate any control equipment installed at the premises in a proper and efficient manner.	This applies to biotrickling filter, deodorisers and stack.
Protection of the Environment Operations (Clean Air) Regulation 2010	Standards of concentration for scheduled premises	Sch 4	<p>General standards of concentration apply to the activities at the site and include:</p> <p>Solid Particles (total) for any activity or plant: Group 6 = 50 mg/m<sup>3</sup></p>	Any release of air impurities is required to comply with this requirement.



Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Protection of the Environment Operations (Waste) Regulation 2014	Waste and transport	Part 2 Part 3 Part 4 Part 5	Part 2 relates to contributions by occupiers of scheduled waste facilities. Part 3 relates to records, measurement of waste and monitoring at scheduled waste facilities Part 4 relates to the tracking of certain waste transported within, out of and into NSW. Part 5 relates to reporting on transportation of waste from NSW to an interstate waste facility if the waste has been generated in the metropolitan levy area.	The site operates a scheduled waste facility and therefore Parts 2 and 3 apply.  Trackable waste is addressed in the Waste Management Plan.
Water Management Act 2000	Water access licence	S56 S60A S89 S91A	A licence may be required in the relevant water sharing plan area for the right to share available water from a particular water source. Water cannot be taken from a waterbody without a licence.	Does not apply
	Water management works	S90 S91B S91C S91D	Approval is required for construction and/or use of a water supply work, drainage work or flood work.	Does not apply
	Waterfront land	S91	A controlled activity approval is required for works on or under waterfront land.	Does not apply
Water Act 1912	Surface water	S10	A licence or permit may be required for the taking and using of water from a stream or river, capture of water in a farm dam.	Does not apply
Applies to water sources in NSW where water sharing plans have not commenced.	Groundwater	S112	A licence may be required for extraction of groundwater.	Does not apply



Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Work Health and Safety Regulation 2017	Labelling of hazardous chemicals	S341	Hazardous chemical used, handled or stored at the workplace must be correctly labelled in accordance with clause 335.  Schedule 9, Part 3 of the Regulation sets out requirements for labelling.	All hazardous chemicals on site must be correctly labelled.
	Hazardous chemicals register	S346	A register of hazardous chemicals used, handled and stored at the site needs to be prepared and maintained and include the current safety data sheets for each hazardous chemical listed.	A copy of the hazardous chemical register will be available within the office.
	Manifest of hazardous chemicals	S347	If quantities of hazardous chemicals exceed manifest quantities in Schedule 11, a manifest of hazardous chemicals must be prepared. The manifest must comply with Schedule 12 of the regulation.	Does not apply.
	Manifest Quantities	S348	Notification to SafeWork is required if manifest quantities in Schedule 11 are exceeded.	Does not apply.
	Placarding Requirements	S349 S350	Outer warning placards are to be displayed if the placard quantity in Schedule 11 is exceeded.  A placard must comply with Schedule 13.	Placarding of hazardous chemicals needs to comply with Schedule 13.
	Emergency Plans and Safety Equipment	S359 S360 S361 S362	Fire protection and firefighting equipment designed for the types of hazardous chemicals used and stored at the site must be installed, tested and maintained.  Equipment must be available for use in an emergency.	Appropriate fire protection equipment is required at the facility.
Dangerous Goods (Road and Rail Transport) Act 2008	Transport of dangerous goods	S9	Clause 9 requires transport of dangerous goods by road or rail to be in a safe manner.	DGs shall be transported by a licensed contractor.





Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Waste Avoidance and Resource Recovery Act, 2001	Waste Strategy	S12	Promotes waste avoidance and resource recovery and provides for a state-wide Waste Strategy to achieve a continual reduction in waste generation.  The NSW Waste Avoidance and Resource Recovery Strategy 2014-21 provides the framework for waste management until 2021.	The facility meets the objectives of the Act and strategy in providing resource recovery.
Contaminated Land Management Act 1997	Reporting contamination	S60	Clause 60 relates to the duty of a person undertaking activities that have contaminated land and the land owner to report contamination.	Applies upon discovery and/or incident.
Noxious Weeds Act 1993	Weed control & reporting	S12 S15	Clause 12 relates to private occupiers of land responsibility to control noxious weeds on land. Clause 15 requires occupiers of land to notify local control authority of notifiable weeds.	Applies upon discovery.
Biodiversity Conservation Act 2016 No 63	Protection of animals and plants	Part 2	Clause 2.1 relates to offences for harming animals that are a threatened species, part of a threatened ecological community or a protected animal. Clause 2.2 relates to offences for picking plants. Clause 2.3 and 2.4 relate to offences for damaging areas of outstanding biodiversity and habitat of threatened species or ecological community.	Applies upon discovery.
	Clearing of native vegetation	S2.11	A biodiversity conservation licence is required for clearing of native vegetation	Does not apply
Environment Protection and Biodiversity Conservation Act 1999 (Cth)	Flora and fauna conservation	Part 13	A permit is required for activities that will affect listed species and ecological communities within a commonwealth area.	Does not apply



Legislation	Activity / Aspect	Section / Clause	Requirements	Comments
Heritage Act 1977	Heritage	S57 S139 S146	Clause 57 requires approval for work to any item to which an interim heritage order or listing on the state heritage register applies. Clause 139 requires that an excavation permit is required to disturb any land knowing or having reasonable cause to suspect disturbance may uncover a relic. Clause 146 requires that discovery of a relic must be notified to the Heritage Council.	Applies upon discovery
Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)	Protection of places and objects	S20 S22	Clause 20 relates to reporting of any discovery of Aboriginal remains to the Minister. Clause 22 requires compliance with the provisions of any declaration in relation to a significant Aboriginal area or object.	Applies upon discovery
National Greenhouse and Energy Reporting Act 2007 and Regulations 2008	Greenhouse Gas emissions	S13	Requirement for the accounting and reporting of greenhouse gases emitted and energy consumed or produced during a financial year if the facility meets the thresholds in Clause 13.	Does not apply.
Fisheries Management Act 1994	Permits	S144 S201 S205 S219	Clause 144: Aquaculture permit Clause 201: Permit to carry out dredging or reclamation work Clause 205: Permit to cut, remove, damage or destroy marine vegetation on public water land or an aquaculture lease, or on the foreshore of any such land or lease. Clause 219: Permit to: (a) set a net, netting or other material, or (b) construct or alter a dam, floodgate, causeway or weir, or (c) otherwise create an obstruction, across or within a bay, inlet, river or creek, or across or around a flat	Does not apply.



Table A1-1: Licences, Approvals and Permits

Type	Relevant Legislation	Required?	Agency
<b>LICENCES</b>			
<b>Environment Protection Licence</b>	<b>Schedule 1 of the Protection of the Environment Operations Act 1997</b>	<b>Yes</b>	<b>NSW EPA</b>
Surface Water Licence	Water Act 1912	No	Office of Water
Groundwater Licence	Water Act 1912	No	Office of Water
Water Access Licence	Water Management Act 2000	No	Office of Water
<b>PERMITS</b>			
Permits under the Fisheries Management Act	Fisheries Management Act 1994	No	DPI Fishing and Aquaculture
Aboriginal Heritage Impact Permit	National Parks & Wildlife Act 1974	No	OEH
Permits under the Heritage Act 1977	Heritage Act 1977	No	OEH
<b>APPROVALS</b>			
<b>Planning Approval/Consent</b>	<b>Section 4.38 of Environmental Planning and Assessment Act 1979</b>	<b>Yes</b>	<b>The Minister for Planning and Public Spaces</b>
Alter or erect improvements within a mine subsidence district	Mine Subsidence Compensation Act 1961	No	Mine Subsidence Board
Consent for works and structures in a public road	Roads Act 1993	No	RMS
Sub-division or development of bush fire prone land	Rural Fires Act 1997	No	Commissioner of the NSW Rural Fire Service

Table A1-2: Project Approval SSD-10407: Requirements for environmental management

Condition	Requirement	Relevant Section
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	3.3



Condition	Requirement	Relevant Section
A6	The Applicant must not: receive or process more than 100,000 tonnes of industrial liquid waste per year; receive or process more than 10,000 tonnes combined of liquid product waste, liquid food waste, shoes, make up or clothes per year; store more than 377 tonnes of liquid waste at any one time (industrial liquid waste and liquid product waste) at the Liquid Waste Treatment Plant (LWTP) at 14 Kiora Crescent; store more than 100 tonnes (combined) of liquid product, liquid food waste, shoes, make up or clothes at any one time at Waste Processing Facility (WPF) at 16 Kiora Crescent; and receive dairy products, including out-of-date dairy products.	1.1.6
A7	The Applicant must not: (a) permit heavy vehicles longer than 10 metres to enter or exit the site; (b) permit heavy or light vehicles associated with the development to park or queue on the public road network; (c) permit heavy vehicles to park onsite if appropriate off-site parking is available; and (d) operate the development when heavy vehicles are parked onsite, except in accordance with the Parking Strategy required by Condition B3.	Sub-plan B1
B1	The Applicant must ensure: (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004), AS 2890.2:2018 Parking facilities Off-Street commercial vehicle facilities (Standards Australia, 2018) and AS 2890.2:2009 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2009); (b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines; (c) no vehicle longer than 10m is permitted to enter or exit the site; no more than three heavy vehicles enter and exit the site each hour; the development does not result in any vehicles queuing on the public road network; (d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site; (e) all vehicles are wholly contained on site before being required to stop; all loading and unloading of materials are carried out on-site; and (f) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.	Sub-plan B1
B2	<b>Parking</b> The Applicant must provide sufficient parking facilities, including for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities.	Sub-plan B1



Condition	Requirement	Relevant Section
B3	<p>Prior to commencement of operation, the Applicant must prepare a Parking Strategy for the Development to the satisfaction of the Planning Secretary. The Parking Strategy must form part of the OTMP required by Condition B5 and the OEMP required by Condition C2 and must:</p> <ul style="list-style-type: none"> <li>(a) be prepared in consultation with Council;</li> <li>(b) detail the number and location(s) of parking spaces for all vehicles associated with the development, including any off-site locations;</li> <li>(c) include a requirement for heavy vehicles to always use approved off-site parking, when available, in preference to onsite parking;</li> <li>(d) provide details of contingency measures, such as restrictions in processing capacity or hours of operation of the LWTP or WPF, which are required when heavy vehicles are parked onsite, including triggers for measures and restrictions;</li> <li>(e) include a firm commitment to adhere to any contingency measures and restrictions identified in (d) above, including any reduction in hours of operation;</li> <li>(f) include a program to monitor the effectiveness of these measures; and</li> <li>(g) if necessary, detail procedures for notifying neighbouring properties and Council of any potential disruptions to parking.</li> </ul> <p>The Parking Strategy must be revised to the satisfaction of the Planning Secretary in the event onsite or off-site parking arrangements are amended in the future.</p>	Sub-Plan B1
B4	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the Parking Strategy required by Condition B3 is approved by the Planning Secretary; and</li> <li>(b) implement the most recent version of the Parking Strategy approved by the Planning Secretary for the duration of the development.</li> </ul>	Noted
B5	<p><b>Operational Traffic Management Plan</b></p> <p>Prior to commencement of operation, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C2 and the OEMP required by Condition C2 and must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s);</li> <li>(b) be prepared in consultation with Council;</li> <li>(c) detail the measures that are to be implemented to ensure road safety and network efficiency during operation;</li> <li>(d) detail the measures that are to be implemented to ensure delivery vehicle arrival times are appropriately staggered to ensure arriving heavy vehicles so not queue on the road network, including the use of a vehicle tracking system;</li> <li>(e) detail heavy vehicle routes, access and parking arrangements;</li> <li>(f) include a Driver Code of Conduct to: <ul style="list-style-type: none"> <li>(i) minimise the impacts on the local and regional road network;</li> <li>(ii) minimise conflicts with other road users;</li> <li>(iii) minimise road traffic noise;</li> <li>(iv) ensure truck drivers use specified haul routes; and</li> </ul> </li> </ul> <p>include a program to monitor the effectiveness of these measures.</p>	Sub-Plan B1



Condition	Requirement	Relevant Section
B6	The Applicant must: (a) not commence operation until the OTMP required by Condition B5 is approved by the Planning Secretary; and (b) implement the most recent version of the OTMP approved by the Planning Secretary for the duration of the development.	Noted
B7	The Applicant shall not cause, permit or allow any materials or waste (as defined by the POEO Act) generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	Sub-Plan B2
B8	All waste processing, and material handling activities must be undertaken in an enclosed processing building and within designated areas.	Sub-Plan B2
B9	All waste received on site must always be secured and maintained within designated waste storage areas shown in Appendix 1 and must not leave the site onto neighbouring public or private properties.	Sub-Plan B2
B10	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and direct all wastes to a facility or premises that may lawfully accept the waste.	Sub-Plan B2
B11	The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.	Sub-Plan B2
B12	Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan (WMP) for the development, to the satisfaction of the Planning Secretary. The WMP must form part of the OEMP required by Condition C2 and must: (a) be prepared by a suitably qualified and experienced person(s); (b) include suitable provision to monitor the: (i) quantity, type and source of waste received on site; and (ii) quantity, type and quality of the outputs produced on site. (c) ensure that: (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and (ii) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste. (d) include procedures for ensuring waste would be appropriately managed during unexpected machinery breakdown.	Sub-Plan B2
B13	The Applicant must: (a) not commence operation until the WMP is approved by the Planning Secretary; and (b) implement the most recent version of the WMP approved by the Planning Secretary for the duration of the development.	Noted
B14	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	Sub-Plan B3
B15	The Applicant must ensure the stormwater system does not direct contaminated stormwater to Council's stormwater system.	Sub-Plan B3



Condition	Requirement	Relevant Section
B16	<p>Prior to the commencement of operation, the Applicant must prepare a Surface Water Management Plan (SWMP) to the satisfaction of the Planning Secretary. The SWMP must form part of the OEMP required by Condition C2 and must:</p> <ul style="list-style-type: none"> <li>(a) detail water use, metering, disposal and management on-site;</li> <li>(b) detail the management of wastewater streams on-site;</li> <li>(c) include suitable provision to monitor the surface water impact assessment criteria, including trigger levels for investigating and potential adverse surface water impacts;</li> <li>(d) include spill management procedures; and</li> <li>(e) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.</li> </ul>	Sub-Plan B3
B17	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the SWMP required by Condition B16 is approved by the Planning Secretary; and</li> <li>(b) implement the most recent version of the SWMP approved by the Planning Secretary for the duration of the development.</li> </ul>	Noted
B18	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Sub-Plan B4
B19	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	Sub-Plan B4
B20	All tanks must vent to the biotrickling filter system and the air discharged from the biotrickling filter must be exhausted through the stack 6 m above the roofline. The biotrickling filter system stack must have a compliant sampling plane in accordance with AS4323.1-1995.	Sub-Plan B4
B21	<p>Prior to the commencement of operation, the Applicant must prepare an Air Quality and Odour Management Plan (AQOMP) to the satisfaction of the Planning Secretary. The AQOMP must form part of the OEMP required by Condition C2. The AQOMP must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s);</li> <li>(b) be prepared in consultation with the EPA;</li> <li>(c) detail and rank all emissions from all sources of the development, including odour;</li> <li>(d) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;</li> <li>(e) identify the control measures that that will be implemented for each emission source; and</li> <li>(f) describe the following for each of the proposed controls: <ul style="list-style-type: none"> <li>(i) key performance indicator;</li> <li>(ii) monitoring method;</li> <li>(iii) location, frequency and duration of monitoring;</li> <li>(iv) record keeping;</li> <li>(v) complaints register;</li> <li>(vi) response procedures; and</li> <li>(vii) compliance monitoring.</li> </ul> </li> </ul>	Sub-Plan B4



Condition	Requirement	Relevant Section												
B22	The Applicant must: (a) not commence operation until the AQOMP required by Condition B21 is approved by the Planning Secretary; and (b) implement the most recent version of the AQOMP approved by the Planning Secretary for the duration of the development.	Noted												
B23	The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Sub-Plan B4												
B24	The Applicant must carry out an Odour Audit of the development no later than six months after the commencement of operation of the development. Division 9.4 of Part 9 of the EP&A Act applies to this audit which is for the purpose of auditing the development against the odour impact predictions of the development. The audit must: (a) be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Planning Secretary; (b) audit the development in full operation; (c) include a summary of odour complaints and any actions that were carried out to address the complaints; (d) assess the operation against odour impact predictions in the EIS and RtS; (e) review design and management practices in the development against industry best practice for odour management; and (f) include an action plan that identifies and prioritises any odour mitigation measures that may be necessary to reduce odour emissions.	4.3.2												
B25	Within six months of commissioning of the Odour Audit required by Condition B24, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the Odour Audit report to the satisfaction of the Planning Secretary, together with the Applicant's response to any recommendations contained in the Odour Audit report.	2.3.1.3												
B26	The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary.  <i>Table 1 Hours of Work</i> <table border="1"> <thead> <tr> <th>Activity</th><th>Day</th><th>Time</th></tr> </thead> <tbody> <tr> <td>Construction</td><td>Monday – Friday Saturday</td><td>7 am to 6 pm 8 am to 1 pm</td></tr> <tr> <td>Operation of liquid waste treatment plant at 14 Kiora Crescent, Yennora</td><td>Monday – Sunday</td><td>24 hours</td></tr> <tr> <td>Operation of waste processing facility at 16 Kiora Crescent, Yennora</td><td>Monday – Sunday</td><td>24 hours</td></tr> </tbody> </table>	Activity	Day	Time	Construction	Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm	Operation of liquid waste treatment plant at 14 Kiora Crescent, Yennora	Monday – Sunday	24 hours	Operation of waste processing facility at 16 Kiora Crescent, Yennora	Monday – Sunday	24 hours	1.1.5
Activity	Day	Time												
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Operation of waste processing facility at 16 Kiora Crescent, Yennora	Monday – Sunday	24 hours												
B27	Works outside of the hours identified in Condition B26 may be undertaken in the following circumstances: (a) works that are inaudible at the nearest sensitive receivers; (b) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (c) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	Noted.												





Condition	Requirement	Relevant Section								
B28	<p>The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2.</p> <p><i>Table 2 Noise Limits dB(A)</i></p> <table><tr><th>Location</th><th>Day L<sub>Aeq</sub>(15 minute)</th><th>Evening L<sub>Aeq</sub>(15 minute)</th><th>Night L<sub>Aeq</sub>(15 minute)</th></tr><tr><td>All residential receivers</td><td>47</td><td>43</td><td>38</td></tr></table>	Location	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)	All residential receivers	47	43	38	Att A4
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All residential receivers	47	43	38							
B29	The Applicant must ensure that the quantities of dangerous goods stored and handled at the site or transported to and from the site are below the screening threshold quantities listed in the Department’s Applying SEPP 33 at all times, except for dangerous goods Class 6.2 Packing Group III infectious substances (DG Class 6.2 PG III).	Att A4								
B30	The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA’s Storing and Handling of Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change, 2007).	Att A4								
B31	<p>Prior to commencement of operation of the development, the Applicant must prepare and implement a comprehensive Emergency Plan. The Emergency Plan must:</p> <ul style="list-style-type: none"><li>(a) be prepared in accordance with the <i>Department’s Hazardous Industry Planning Advisory Paper No. 1, ‘Emergency Planning’</i>, including;<ul style="list-style-type: none"><li>(i) on-site and off-site fire events and other emergency incidents or potential hazmat incidents</li><li>(ii) safety of all people outside of the development who may be at risk from the development;</li><li>(iii) the measures that would be implemented to mitigate potential risks to the health and safety of firefighters and other first responders;</li><li>(iv) other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site; and</li></ul></li><li>(b) detail emergency procedures for the development.</li></ul>	Complete								
B32	Prior to the commencement of operation, the final fire and life safety design of the development, including firewater containment, must be finalised in consultation with FRNSW to the satisfaction of the Planning Secretary and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) Series.	2.5								
B33	Prior to commencement of operation of the development, the Applicant must prepare an Emergency Services Information Package (ESIP) in accordance with the Fire and Rescue NSW ‘Fire Safety Guideline – Emergency Services Information Package and tactical fire plans.’ and ensure the ESIP is readily accessible to emergency service organisations at all times.	2.5								



Condition	Requirement	Relevant Section
C1	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> <li>(a) detailed baseline data;</li> <li>(b) details of: <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures and criteria; and</li> <li>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> </li> <li>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>(d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the development; and</li> <li>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</li> </ul> </li> <li>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</li> <li>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</li> <li>(ii) complaint;</li> <li>(iii) failure to comply with statutory requirements; and</li> </ul> </li> <li>(h) a protocol for periodic review of the plan.</li> </ul>	Detailed in each plan
C2	The Applicant must prepare an Operational Environmental Management Plan (OEMP) in accordance with the requirements of Condition C1 and to the satisfaction of the Planning Secretary.	1.2



Condition	Requirement	Relevant Section
C3	<p>As part of the OEMP required under Condition C2 of this consent, the Applicant must include the following:</p> <ul style="list-style-type: none"> <li>(a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</li> <li>(b) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>(ii) receive, handle, respond to, and record complaints;</li> <li>(iii) resolve any disputes that may arise;</li> <li>(iv) respond to any non-compliance;</li> <li>(v) respond to emergencies; and</li> </ul> </li> <li>(c) include the following environmental management plans: <ul style="list-style-type: none"> <li>(i) Traffic (see Condition B5) including Parking (see Condition B3);</li> <li>(ii) Waste (see Condition B12);</li> <li>(iii) Surface Water (see Condition B16); and</li> <li>(iv) Air Quality (see Condition B21).</li> </ul> </li> </ul>	1.2
C4	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the OEMP is approved by the Planning Secretary; and</li> <li>(b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).</li> </ul>	Noted
C5	<p>Within three months of:</p> <ul style="list-style-type: none"> <li>(a) the submission of a Compliance Report under Condition C11;</li> <li>(b) the submission of an incident report under Condition C7;</li> <li>(c) the submission of an Independent Audit under Condition C13;</li> <li>(d) the approval of any modification of the conditions of this consent;</li> <li>(e) or the issue of a direction of the Planning Secretary under Condition A2(b) which requires a review.</li> </ul> <p>The strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing that a review is being carried out.</p>	4.6
C6	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.</p>	4.6
C7	<p>The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in 0.</p>	2.5.1



Condition	Requirement	Relevant Section
C8	The Planning Secretary must be notified in writing to the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	4.5 2.3.1.5
C9	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	2.3.2.5
C10	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Noted
C11	Within three months after the first year of commencement of operation, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Department reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also: <ul style="list-style-type: none"> <li>(a) identify any trends in the monitoring data over the life of the development;</li> <li>(b) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</li> <li>(c) describe what measures will be implemented over the next year to improve the environmental performance of the development</li> </ul>	2.3.1.6
C12	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.	2.3.1.6
C13	Within one year of the commencement of operation, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must: <ul style="list-style-type: none"> <li>(a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)</li> <li>(b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and</li> <li>(c) be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).</li> </ul>	4.3.1



Condition	Requirement	Relevant Section
C14	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:</p> <ul style="list-style-type: none"> <li>a) review and respond to each Independent Audit Report prepared under Condition C13 of this consent;</li> <li>b) submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations;</li> <li>c) implement the recommendations to the satisfaction of the Planning Secretary; and</li> <li>d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.</li> </ul>	2.3.1.7
C15	<p>Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&amp;A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.</p>	Noted



Condition	Requirement	Relevant Section
C16	<p>At least 48 hours before the commencement of construction until the completion of all works under this consent, the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> <li>(i) the documents referred to in Condition A2 of this consent;</li> <li>(ii) all current statutory approvals for the development;</li> <li>(iii) all approved strategies, plans and programs required under the conditions of this consent;</li> <li>(iv) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;</li> <li>(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</li> <li>(vi) a summary of the current stage and progress of the development;</li> <li>(vii) contact details to enquire about the development or to make a complaint;</li> <li>(viii) a complaints register, updated monthly;</li> <li>(ix) the Compliance Report of the development;</li> <li>(x) audit reports prepared as part of any Independent Audit of the development and the Applicant's response to the recommendations in any audit report;</li> <li>(xi) any other matter required by the Planning Secretary; and</li> </ul> </li> <li>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</li> </ul>	Completed



Table A1-3: EPL requirements

Condition	Requirement	Relevant EMP Section															
L1	<b>Pollution of Waters</b>																
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Sub-plan B3															
L2	<b>Concentration Limits</b>																
L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Sub-plan B4															
L2.2	Air Concentration Limits POINT 1	Sub-plan B4															
	<table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th></tr><tr><td>Benzene</td><td>milligrams per cubic metre</td><td>1</td><td>Dry, 273 K, 101.3 kPa</td><td></td></tr><tr><td>volatile organic compounds as n-propane equivalent</td><td>milligrams per cubic metre</td><td>40</td><td>Dry, 273 K, 101.3 kPa</td><td></td></tr></table>		Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Benzene	milligrams per cubic metre	1	Dry, 273 K, 101.3 kPa		volatile organic compounds as n-propane equivalent	milligrams per cubic metre	40	Dry, 273 K, 101.3 kPa	
	Pollutant		Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction											
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volatile organic compounds as n-propane equivalent	milligrams per cubic metre	40	Dry, 273 K, 101.3 kPa														
L3	<b>Volume and mass limits</b>																
L3.1	The quantity of waste stored at the premises must not exceed 477 tonnes at any one time.	Sub-plan B2															
L3.2	The quantity of waste received at 14 Kiora Crescent for storage and/or treatment must not exceed 100,000 tonnes per annum.	Sub-plan B2															
L3.3	The quantity of waste received at 16 Kiora Crescent for storage and/or treatment must not exceed 10,000 tonnes per annum.	Sub-plan B2															



Condition	Requirement	Relevant EMP Section																																													
L4	<b>Waste</b>																																														
L4.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence.</p> <table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>Z140</td><td>Non controlled liquids</td><td></td><td>Waste processing (non-thermal treatment)</td><td></td></tr><tr><td>NA</td><td>Liquid Food Waste</td><td></td><td>Waste processing (non-thermal treatment)</td><td></td></tr><tr><td>N205</td><td>Residues from industrial waste treatment/disposal operations</td><td>Landfill leachates.</td><td>Waste processing (non-thermal treatment) Waste storage</td><td>Only leachate from landfills. Excluding landfill leachates contaminated with heavy metals and/or hydrocarbons (aromatic/ aliphatic).</td></tr><tr><td>NA</td><td>Liquid Waste</td><td>Liquid waste material in glass, plastic or aluminium containers.</td><td>Waste processing (non-thermal treatment) Waste storage</td><td>Only off-spec or expired consumer products.</td></tr><tr><td>M250</td><td>Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials.</td><td></td><td>Waste processing (non-thermal treatment) Waste storage</td><td>Excluding surface active agents containing PFAS/PFOA.</td></tr><tr><td>J120</td><td>Waste oil/hydrocarbons mixtures/emulsions in water</td><td></td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr><tr><td>K130</td><td>Sewage sludge &amp; residues</td><td></td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr><tr><td>K110</td><td>Grease trap waste</td><td></td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr></table>	Code	Waste	Description	Activity	Other Limits	Z140	Non controlled liquids		Waste processing (non-thermal treatment)		NA	Liquid Food Waste		Waste processing (non-thermal treatment)		N205	Residues from industrial waste treatment/disposal operations	Landfill leachates.	Waste processing (non-thermal treatment) Waste storage	Only leachate from landfills. Excluding landfill leachates contaminated with heavy metals and/or hydrocarbons (aromatic/ aliphatic).	NA	Liquid Waste	Liquid waste material in glass, plastic or aluminium containers.	Waste processing (non-thermal treatment) Waste storage	Only off-spec or expired consumer products.	M250	Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials.		Waste processing (non-thermal treatment) Waste storage	Excluding surface active agents containing PFAS/PFOA.	J120	Waste oil/hydrocarbons mixtures/emulsions in water		Waste processing (non-thermal treatment) Waste storage		K130	Sewage sludge & residues		Waste processing (non-thermal treatment) Waste storage		K110	Grease trap waste		Waste processing (non-thermal treatment) Waste storage		Sub-Plan B2
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L4.2	<p><b>Definition of PFAS Contaminated Liquid Waste</b></p> <p>PFAS contaminated liquid waste means a liquid waste that has a concentration of PFOS/PFHxS greater than or equal to 0.7 micrograms/litre or a concentration of PFOA greater than or equal to 5.6 micrograms/litre.</p>	Noted.																																													
L4.3	The licence does not permit the storage or processing of PFAS contaminated liquid waste at the premises.	Sub-plan B2																																													
L5	<b>Noise Limits</b>																																														
L5.1	The licensee must not cause any offensive noise beyond the boundary of the premises	Att A4																																													





Condition	Requirement	Relevant EMP Section
L6	<b>Potentially Offensive Odour</b>	
L6.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	Sub-plan B4
L6.2	No condition of this licence identifies a potentially offensive odour for the purpose of the section 129 of the Protection of the Environment Operations Act 1997.	Sub-plan B4
O1	<b>Activities Must be Carried out in a Competent Manner</b>	
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	This plan Att A4 Sub-plans
O1.2	The facility must be adequately staffed with suitably qualified and experienced persons at all times when wastes are received and/or when the processing plant is operated.	Noted.
O2	<b>Maintenance of Plant and Equipment</b>	
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	This plan
O3	<b>Emergency Response</b>	
O3.1	The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The licensee must keep the incident response plan on the premises at all times. The incident response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment.  The PIRMP must be tested at least annually or following a pollution incident.  The licensee must develop the Pollution Incident Response Management Plan in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations (POEO) Act 1997 and POEO regulations.	PIRMP on website
O4	<b>Processes and Management</b>	
O4.1	The licensee must ensure that all liquid materials including chemicals, fuels, oils, and waste materials are stored in a designated impervious bund that contains 110% of the largest container/tank contained within the bund	Att A4
O4.2	The bunded area (floor and walls) must be impervious to the liquid(s) stored in the bunded area. The bund wall must not contain drain valves.	Complies
O4.3	The licensee must ensure that all waste processing is conducted wholly within bunds and in an enclosed building.	Sub-plan B2



Condition	Requirement	Relevant EMP Section
O4.4	At all times when wastes are received and/or when the processing plant is operated, the licensee must have suitably qualified and experienced personnel on site who are trained and experienced to perform all the necessary on site monitoring and/or testing of incoming wastes, waste treatment in progress, treated wastes and process plant residues.	Sub-plan B2
O4.5	All liquid waste must be received and treated in an enclosed building with roller doors.	Sub-plan B4 Att A4
O4.6	The facility must not receive out-of-date dairy products.	Sub-plan B2
O4.7	All tanks must vent to the biotrickling filter system and the air discharged from the biotrickling filter must be exhausted through a stack 6 m above the roofline	Sub-plan B4
O4.8	The biotrickling filter system stack must have a compliant sampling plane in accordance with AS4323.1-1995.	Sub-plan B4
O5	<b>Waste Management</b>	
O5.1	The licensee must undertake an initial characterisation of any liquid waste to ascertain the classification of the waste and ensure that it is a waste which it is licensed to receive. This characterisation must be documented and retained by the licensee.	Sub-plan B2
O5.2	The licensee must ensure that suitable measures (e.g. high/low alarms, control valves with interlock control, one way valves) are installed on all tanks, ponds or clarifiers and associated pipes and hoses to prevent the spillage of waste.	Sub-plan B2
O5.3	Loading, unloading or handling of waste materials, treated or otherwise, must be conducted wholly within bunds and within a building at all times.	Sub-plan B2
O5.4	The licensee must ensure that all waste materials including containers & drums containing waste materials referred to in this licence and containers & drums that are contaminated with residues of a substance or substances referred to in this licence are handled and stored only within the building and within bunded area at all times.	Sub-plan B2
O5.5	When waste is transported from the premises, the licensee must ensure that the waste is transported:  (a) by a waste transporter authorised to transport such waste; and (b) to a place that can lawfully be used as a waste facility for that waste.	Sub-plan B2
O6	<b>Other Operating Conditions</b>	
O6.1	<b>Stormwater Management</b> The licensee must ensure that stormwater from all areas of the premises including driveways which have potential to have waste, fuel, oil or any chemical spillages must be controlled. The licensee must ensure that no waste, fuel, oil or any chemical spillage enters the stormwater.	Sub-plan B3
M1	<b>Monitoring Records</b>	
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Noted.



Condition	Requirement	Relevant EMP Section												
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	4.2.1												
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	4.2.1												
M2	<b>Requirement to monitor concentration of pollutants discharged</b>													
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutants specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Sub-plan B4												
M2.2	<div>Air Monitoring Requirements</div> <div><b>POINT 1</b></div> <table><thead><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr></thead><tbody><tr><td>Benzene</td><td>micrograms per cubic metre</td><td>Yearly</td><td>TM-34</td></tr><tr><td>volatile organic compounds as n-propane equivalent</td><td>micrograms per cubic metre</td><td>Yearly</td><td>TM-34</td></tr></tbody></table>	Pollutant	Units of measure	Frequency	Sampling Method	Benzene	micrograms per cubic metre	Yearly	TM-34	volatile organic compounds as n-propane equivalent	micrograms per cubic metre	Yearly	TM-34	Sub-plan B4
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M3	<b>Testing methods – concentration limits</b>													
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	Sub-plan B4 Noted												
M4	<b>Recording of Pollution Complaints</b>													
M4.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Att A3												



Condition	Requirement	Relevant EMP Section
M4.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Att A3
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	2.3.2.1.1
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Noted
M5	<b>Telephone Complaints Line</b>	
M5.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	2.3.2.1.2
M5.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	2.3.2.1.2
M5.3	The preceding two conditions do not apply until three months after: the date of the issue of this licence	Noted
R1	<b>Annual Return Documents</b>	
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices.  At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	2.3.1.1
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	2.3.1.1



Condition	Requirement	Relevant EMP Section
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	Noted
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Noted
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	2.3.1.1
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	2.3.1.1
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	2.3.1.1
R2	<b>Notification of Environmental Harm</b>	
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	2.5.1
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	2.5.1
R3	<b>Written Report</b>	
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	2.5.1 Att A3
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	2.5.1 Att A3



Condition	Requirement	Relevant EMP Section
R3.3	<p>The request may require a report which includes any or all of the following information:</p> <ul style="list-style-type: none"> <li>a) the cause, time and duration of the event;</li> <li>b) the type, volume and concentration of every pollutant discharged as a result of the event;</li> <li>c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</li> <li>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</li> <li>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</li> <li>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</li> <li>g) any other relevant matters.</li> </ul>	2.5.1 Att A3
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Noted.
G1	<b>Copy of Licence Kept at the Premises or Plant</b>	
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Noted
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Noted
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Noted
E2	<b>Environmental Obligations of Licensee</b>	
E2.1	<p>While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:</p> <ul style="list-style-type: none"> <li>(a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents.</li> <li>(b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA.</li> <li>(c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.</li> </ul>	2.5 Emergency Plan 4.2



Condition	Requirement	Relevant EMP Section
E2.2	<p>In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must:</p> <ul style="list-style-type: none"> <li>(a) Make all efforts to contain all firewater on the licensee's premises;</li> <li>(b) Make all efforts to control air pollution from the licensee's premises;</li> <li>(c) Make all efforts to contain any discharge, spill or run-off from the licensee's premises;</li> <li>(d) Make all efforts to prevent flood water entering the licensee's premises;</li> <li>(e) Remediate and rehabilitate any exposed areas of soil and/or waste;</li> <li>(f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of;</li> <li>(g) At the request of the EPA monitor groundwater beneath the licensee's premises and its potential to migrate from the licensee's premises;</li> <li>(h) At the request of the EPA monitor surface water leaving the licensee's premises and</li> <li>(i) Ensure the licensee's premises is secure.</li> </ul>	2.5.1 Emergency Plan
E2.3	<p>After the licensee's premises ceases to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:</p> <ul style="list-style-type: none"> <li>(a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises;</li> <li>(b) rehabilitate the site, including conducting an assessment of and, if required, remediation of any site contamination.</li> </ul>	Noted.

Please note an application for the EPL to be varied has been submitted to include the solid waste type for 16 Kiora Crescent. This variation is still pending.

## Attachment A2: Environmental Aspects Register

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## Environmental Aspects Register

Environmental Aspects Register for Enviro Waste Services									
Activity	Aspect	Potential Impacts on the Environment	Pre-Control Risk			Mitigation Measures (Physical, Procedures and Plans)	Post-Control Risk		
			Consequence	Likelihood	Raw Risk		Consequence	Likelihood	Residual Risk
WASTE HANDLING (16 KIORA)	Handling activities (loading and unloading)	Noise emissions	2	4	H	Unloading activities undertaken in enclosed building, weekly inspection checklist, regular maintenance of equipment	2	2	L
		Generation of air pollutants (dust and odour)	3	4	H	Indoor operations, dedicated storage areas including tanks, IBCs and bins, weekly inspection checklist, Sub-Plan B4: Air Quality and Odour Management Plan	2	2	L
		Contamination of stormwater runoff	3	3	H	Unloading and loading within fully enclosed building, hardstand surfaces, isolated stormwater system, bunded operational areas, weekly inspection checklist, spill procedure, spill kits, Sub-Plan B3: Surface Water Management Plan	2	2	L
		Excess accumulation of unwanted waste	2	3	M	Dedicated waste storage tanks/bins, no stockpiles on site, weekly inspection checklist, incoming waste procedure,	1	2	L
	Processing activities: <ul style="list-style-type: none"><li>shredding</li><li>manual sorting</li><li>manual pouring</li></ul>	Noise emissions	2	3	M	Processing activities undertaken within enclosed building, weekly inspection checklist, regular maintenance of equipment	2	2	L
		Generation of air pollutants (dust and odour)	3	4	H	Processing activities undertaken within enclosed building, no dairy products accepted, incoming waste procedure, weekly inspection checklist, regular maintenance of equipment, Sub-Plan B4: Air Quality and Odour Management Plan	2	2	L
		Contamination of stormwater runoff	2	3	M	Processing activities within fully enclosed building, hardstand surfaces, isolated stormwater system, bunded operational areas, weekly inspection checklist, spill procedure, spill kits, Sub-Plan B3: Surface Water Management Plan	2	2	L
		Excess accumulation of unwanted waste	3	2	M	Dedicated waste storage tanks/bins, no stockpiles on site, weekly inspection checklist, incoming waste procedure, Sub-plan B2: waste management plan	1	2	L
	Packaging and Storage	Generation of air pollutants (dust)	3	2	M	Packaging and storage within enclosed building, designated storage receptacles, no dairy products on site, weekly inspection checklist, regular maintenance of equipment, Sub-Plan B4: Air Quality and Odour Management Plan	2	2	L



## Environmental Aspects Register for Enviro Waste Services

Activity	Aspect	Potential Impacts on the Environment	Pre-Control Risk			Mitigation Measures (Physical, Procedures and Plans)	Post-Control Risk		
			Consequence	Likelihood	Raw Risk		Consequence	Likelihood	Residual Risk
		Contamination of stormwater runoff	2	3	M	Packaging and storage within fully enclosed building, hardstand surfaces, isolated stormwater system, designated storage areas, bunded storage areas, weekly inspection checklist, spill procedure, spill kits, Sub-Plan B3: Surface Water Management Plan	2	2	L
		Excess accumulation of unwanted waste	2	3	M	Dedicated waste storage tanks/bins, no stockpiles on site, weekly inspection checklist, incoming waste procedure, Sub-Plan B2: waste management plan	1	2	L
	Transfer IBCs to 14 kiora	On-site traffic congestion and conflict	2	3	M	Sub-Plan B1 – Operational traffic management plan and parking strategy	1	2	L
WASTE HANDLING (14 KIORA)	Handling activities (loading and unloading) – Tank Filling	Noise emissions	2	4	H	Tank filling undertaken in enclosed building, weekly inspection checklist, regular maintenance of equipment	2	2	L
		Odour	2	4	H	Biotrickling filter and 6m stack, deodorisers, tank filling undertaken within an enclosed building, weekly inspection checklist, regular maintenance of pollution control equipment, odour audit, Sub-Plan B4: Air Quality and Odour Management Plan	2	2	L
		Contamination of stormwater runoff	3	4	H	Tank filling undertaken in enclosed building, weekly inspection checklist, regular maintenance of equipment, tanks are bunded, fully sealed surfaces, isolated stormwater system, designated storage areas, bunded storage areas, weekly inspection checklist, spill procedure, spill kits, Sub-Plan B3: Surface Water Management Plan	2	2	L
		Excess accumulation of wastewater	2	2	L	Discharged as tradewaste under TWA, weekly inspection checklist	1	2	L
	Processing activities Primary filtration & settling Secondary filtration	Noise emissions	2	3	M	Processing activities undertaken within building, roller doors closed, weekly inspection checklist, regular maintenance of machinery	2	2	L



## Environmental Aspects Register for Enviro Waste Services

Activity	Aspect	Potential Impacts on the Environment	Pre-Control Risk			Mitigation Measures (Physical, Procedures and Plans)	Post-Control Risk		
			Consequence	Likelihood	Raw Risk		Consequence	Likelihood	Residual Risk
	Dissolved oxygen filtration (DAF)	Odour	2	4	H	Biotrickling filter and 6m stack, deodorisers, processing undertaken within an enclosed building, weekly inspection checklist, regular maintenance of pollution control equipment, odour audit, Sub-Plan B4: Air Quality and Odour Management Plan	2	2	L
		Contamination of stormwater runoff	3	4	H	Processing activities undertaken in enclosed tanks, tanks are bunded, fully sealed surfaces, isolated stormwater system, spill procedure, spill kits, weekly inspection checklist, regular maintenance of equipment, Sub-Plan B3: Surface Water Management Plan	2	2	L
	Solid/sludge removal off site for disposal	Odour	2	4	H	Deodorisers, tank unloading undertaken within an enclosed building, weekly inspection checklist, regular maintenance of pollution control equipment, odour audit, Sub-Plan B4: Air Quality and Odour Management Plan	2	2	L
	Treated liquid to tradewaste	Excess accumulation of wastewater	2	2	L	Discharged as tradewaste under TWA, weekly inspection checklist	1	2	L
VEHICLE MOVEMENTS	Deliveries and pick ups	Noise emissions	2	3	M	Unloading activities undertaken within building, limit idling time, weekly inspection checklist	2	2	L
		Generation of air pollutants (dust and odour)	3	2	M	Handling activities undertaken inside building, sealed surfaces, weekly inspection checklist. Sub-Plan B4: Air Quality and Odour Management Plan	2	2	L
		On-site traffic conflicts	2	3	M	Sub-Plan B1 – Operational traffic management plan and parking strategy	1	2	L
		Excessive use of energy, fossil fuel resources	1	1	L	None	1	1	L
	Staff/visitor vehicles	Noise emissions	2	2	L	Sub-Plan B1 – Operational traffic management plan and parking strategy, Low visitor vehicle movements, weekly inspection checklist	2	1	L
		Generation of air pollutants (dust)	2	2	L	Sealed driving surfaces, weekly inspection checklist	1	2	L



## Environmental Aspects Register for Enviro Waste Services

Activity	Aspect	Potential Impacts on the Environment	Pre-Control Risk			Mitigation Measures (Physical, Procedures and Plans)	Post-Control Risk		
			Consequence	Likelihood	Raw Risk		Consequence	Likelihood	Residual Risk
		Excessive use of energy, fossil fuel resources	1	1	L	None	1	1	L
WASTE & CHEMICAL MANAGEMENT	Excess or incorrect waste generation and/or chemical storage	Potential for waste to escape onto land or into waterways resulting in contamination	3	2	M	Waste stored inside dedicated bunded areas in enclosed building, bunded tanks, Sub-plan B2: waste management plan, weekly inspection checklist	2	2	L
		Contamination of stormwater runoff	3	4	H	Sub-Plan B3: Surface Water Management Plan	2	2	L
		Incorrect management or disposal of wastes	3	2	M	Designated waste bins/bays, weekly inspection checklist	2	2	L
	Paper use & other office waste	Incorrect management of waste, litter	1	2	L	Designated waste bins, weekly inspection checklist	1	1	L
	Flammable gas storage	<b>Fire</b> In the event of fire: -Generation of significant air pollutants -Release of contaminated fire fighting water to surface water, ground water, soil	4	2	H	Strict control of ignition sources in storage and handling areas, employees trained in emergency response and evacuation procedures, excavator and truck driver training, fire services (e.g. hose reel, extinguishers) available, no smoking policy, segregated Dangerous Goods Stores, storage and handling of flammable and combustible liquid in compliance with AS 1940-2017, oil/fuel leakages promptly attended to, preventative maintenance program, fire services onsite comply the BCA and where feasible the NSW FR Fire Safety in Waste Facilities 2019	3	1	M

### Notes:

Pre-Control risk is the risk of the identified potential impacts without controls in place

Post-Control risk is the risk assessed once controls and procedures are in place.

Risk assessment is undertaken following the methodology outlined below (Reference: Standards Australia, HB-203 2006 Environmental Risk Management – Principles and process)

L = Low M = Medium H = High X = Extreme

Activity: This is the process/activity undertaken at the site

Aspect: These are the aspects of the activity that may have impacts. For example: Generation of wastewater, Noise emission, Air/Odour emissions, Sediment laden runoff, Spills of chemical, Disturbance of acid sulfate soils, Vehicle movements, etc.

Potential Impacts on the Environment: These are the potential impacts of each aspect - these are assessed for risk separately.



# ENVIRO WASTE SERVICES GROUP PTY LTD ENVIRONMENTAL MANAGEMENT PLAN

## FORMS

Enviro Waste Services Group Pty Ltd

14-16 Kiora Street, Yennora

Issued and Approved by:

Date:

**Document Reference:** 191251-04\_OEMP\_Att A3\_Forms

**Date of Issue:** 21 December 2021

**Prepared by:**



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---

<b>NO:</b>	<b>F1.1</b>	<b>DATE:</b>	<b>December 2021</b>
<b>PREPARED BY:</b>	Benbow Environmental	<b>ISSUE NO.:</b>	1
<b>SUBJECT:</b>	<b>1.1 INCIDENT REPORT FORM</b>		

---

---

<b>INCIDENT REPORTING – BASIC FACTS</b>	<b>FORM</b>
---	-------------

---

Date & Time of Incident: .....

Site Address: .....

Incident No. ....

---

**Expected cause, duration & specific location of the event/incident:**

---

The type, volume and concentration (if known) of every pollutant discharged or spilt as a result of the incident:

---

Immediate action taken in relation to the event:

---

The name, address and telephone number of any witnesses of the event:

---

Any other relevant matters:

---

I verify that all the information provided herein is a true and accurate of the events that have occurred.

Signed: .....

Name: .....

Date: .....



**NO: F1.2**  
**PREPARED BY:** Benbow Environmental  
**SUBJECT: 1.2 INCIDENT REGISTER**

**DATE: December 2021**  
**ISSUE NO.: 1**

This register is intended as a guide only.

INCIDENT REGISTER						
Incident No.	Date	Time	Reported By (Name)	Incident Details	Action Required	Action complete (sign)

\* The incident number quoted would reference related incident reports with details of each incident.



---

<b>NO:</b>	<b>F1.3</b>	<b>DATE:</b>	<b>December 2021</b>
<b>PREPARED BY:</b>	Benbow Environmental	<b>ISSUE NO.:</b>	<b>1</b>
<b>SUBJECT:</b>	<b>1.3 COMPLAINTS RESPONSE FORM</b>		

---

REF: .....

REV: 1

LOG BOOK REFERENCE NO: .....

DATE: .....TIME: .....AM/PM

NAME OF PERSON WHO RECEIVED CALL: .....

NAME OF COMPLAINANT: .....TELEPHONE NO: .....

ADDRESS: .....

---

**DETAILS OF COMPLAINT:**

DATE OF OCCURANCE: .....TIME AM/PM: .....

**TYPE OF INCIDENT:**

NOISE ☐

STORMWATER ☐

AIR EMISSIONS ☐

ODOUR ☐

TRAFFIC/TRANSPORT ☐

FIRE ☐

EROSION/SEDIMENT ☐

WASTE ☐

OTHER ☐ DETAILS: .....

PRECISE LOCATION OF INCIDENT: .....

PARTICULAR DETAILS RELATING TO THE INCIDENT: .....

.....

.....



**COMPLAINTS RESPONSE FORM**

**PAGE 2 OF 2**

**ACTION TAKEN:**

COMPLAINANT TRANSFERRED TO:

MESSAGE TAKEN FOR: .....

**CORRECTIVE AND PREVENTATIVE ACTION:**

INFORMATION BULLETIN SENT

☐

COMPLAINT INVESTIGATED BY: .....CPAR NO.....

RESULTS OF INVESTIGATION: .....

.....

.....

.....

**ON COMPLETION OF CORRECTIVE AND PREVENTATIVE ACTION:**

LETTER SENT TO COMPLAINANT                      YES      NO      N/A      DATE: .....

WORK PRACTICE MODIFIED                      YES      NO      N/A      DATE: .....

**COMPLAINT RESPONSE COMPLETE:** .....

PRINT NAME

SIGNATURE: .....

DATE: .....

TIME: .....AM/PM



**NO:** F1.4  
**PREPARED BY:** Benbow Environmental  
**SUBJECT:** **1.4 COMPLAINTS REGISTER**

**DATE:** December 2021  
**ISSUE NO.:** 1

This register is intended as a guide only.

COMPLAINTS REGISTER						
Date	Method (phone, email etc)	Complaint Details	Personal details of complainant (name, phone, address) if provided	Action Taken	Complaint No.	Action complete (sign)



**NO: F1.5** **DATE: December 2021**  
**PREPARED BY: Benbow Environmental** **ISSUE NO.: 1**  
**SUBJECT: 1.5 CORRECTIVE & PREVENTATIVE ACTION FORM**

REF: .....

REV: 1

☐

CORRECTIVE ACTION

☐

PREVENTATIVE ACTION

Name of personnel requesting  
corrective/preventative action:

Date:

.....

Outline of the 'Initiating Event' and necessary corrective and/or preventative actions (to be filled out by those requesting action):

.....  
.....  
.....  
.....

Is the event a non-compliance? (please circle):      YES      NO

If yes, non-compliances (not including incidents) need to be notified in writing to the major projects website within 7 days after becoming aware of the non-compliance. Report the following:

- Development application number: SSD-10407
- Name of the development: Yennora Liquid Waste Facility
- The condition of consent that the development is non-compliant with
- The way in which it does not comply
- Reasons for the non-compliance
- Actions that have been (or will be) taken to address the non-compliance

Actions taken to fulfil the requirement of the corrective and/or preventative action:

.....  
.....  
.....  
.....

**Corrective and/or preventative action complete:**

**Signature:** .....

**Date:** .....



**NO: F1.6**  
**PREPARED BY:** Benbow Environmental  
**SUBJECT:** **1.6 INDUCTION TRAINING FORM**

**DATE:** December 2021  
**ISSUE NO.:** 1

**INDUCTION TRAINING**

**FORM**

This is to certify that \_\_\_\_\_ (name) has completed induction training at \_\_\_\_\_ (site name & address) and is competent in the following areas:

**Training Completed:**

**(Tick)**

- Awareness of the purpose and objectives of the site EMP. ☐
- Awareness of legal requirements and individual accountability under environmental legislation applicable to the site, including penalties for offences under environmental legislation. ☐
- Aspects of site operations that could potentially impact the environment. ☐
- How potential impacts are managed on site including monitoring, site inspections and any regular maintenance undertaken. ☐
- Understanding of the various roles and responsibilities, with relevance to procedures. ☐
- Mitigation measures and controls. ☐
- Incident response and reporting requirements including site's PIRMP. ☐
- How to communicate, respond and where to go in an emergency situation ☐

I verify that I understand the information provided herein as part of the induction training and agree to abide by the site's procedures.

Signed: .....

Name: .....

Date: .....

Confirmed by \_\_\_\_\_ (Name of person providing training)

Signed: .....

Date: .....



---

**NO:** F1.6 **DATE:** December 2021  
**PREPARED BY:** Benbow Environmental **ISSUE NO.:** 1  
**SUBJECT:** **1.7 ENVIRONMENTAL TRAINING REGISTER**

---

This register is intended as a guide only.

**TRAINING REGISTER**

Date	Name	Course Name & Details	Training Body
15/12/2021	Joe Bloggs	Site Induction	Internal





# ENVIRO WASTE SERVICES ENVIRONMENTAL MANAGEMENT PLAN

## ENVIRONMENTAL PROCEDURES MANUAL

14-16 Kiora Crescent, Yennora NSW 2161

Issued and Approved by:

Date:

**Document Reference:** 191251-04\_OEMP\_Att A4\_Env Proc  
**Date of Issue:** 21 December 2021

**Prepared by:**



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**PROCEDURE NAME:** NOISE MANAGEMENT

**DATE:** December 2021

**PREPARED BY:** Benbow Environmental

**ISSUE NO.:** 1

## 1. NOISE MANAGEMENT

### 1.1 PURPOSE

The purpose of this procedure is to set out the process relating to management and monitoring of noise from the site operations and includes:

- Any noise management controls and techniques to be implemented for minimising noise on a day to day basis; and
- Noise complaint procedure and details of any monitoring required.

### 1.2 NOISE SOURCES

Noise sources associated with the facility include:

Table 1-1: A-weighted Sound Power Levels Associated with Operational Activities, dB(A)

Noise Source	L <sub>Max</sub>	Overall LAeq	Third Octave Band Centre Frequency (Hz)									
			25	31	40	50	63	80	100	125	160	200
			250	315	400	500	630	800	1k	1.25k	1.6k	2k
			2.5k	3.15k	4k	5k	6.3k	8k	10k	12.5k	16k	20k
Truck Engine	106	103	44	48	57	65	70	73	78	78	80	82
			83	85	94	98	94	96	89	88	82	87
			85	84	82	83	83	82	78	-	-	-
Truck Exhaust	104	101	42	46	55	63	68	71	76	76	78	80
			81	83	92	96	92	94	87	86	80	85
			83	82	80	81	81	80	76	-	-	-
Pump	-	102	40	44	45	76	72	63	69	68	75	75
			78	78	81	85	84	87	93	91	95	93
			93	92	90	89	87	80	72	68	57	40
Air Compressor	-	95	33	38	46	53	56	65	66	68	69	76
			86	76	81	89	84	82	87	83	83	81
			80	78	78	71	68	64	57	53	46	37
LPG Forklift	94	92	36	59	61	51	65	66	77	68	60	62
			66	69	74	81	78	78	81	85	84	84
			81	75	71	71	65	63	56	51	45	42
Shredder	-	101	34	36	39	45	48	58	65	71	78	81
			82	84	88	91	91	93	90	92	90	90
			88	87	87	86	82	78	73	68	62	54
Material	-	106	-	12	-	-	33	-	-	48	-	-
			63	-	-	75	-	-	82	-	-	86

Table 1-1: A-weighted Sound Power Levels Associated with Operational Activities, dB(A)

Noise Source	L <sub>Max</sub>	Overall L <sub>Aeq</sub>	Third Octave Band Centre Frequency (Hz)									
			25	31	40	50	63	80	100	125	160	200
			250	315	400	500	630	800	1k	1.25k	1.6k	2k
			2.5k	3.15k	4k	5k	6.3k	8k	10k	12.5k	16k	20k
Handling			-	-	88	-	-	88	-	-	76	-
Conveyor	-	80	29	31	29	35	38	49	45	49	53	57
			57	65	68	70	68	71	70	72	71	70
			63	63	59	56	52	49	44	42	36	29

### 1.3 PROCEDURE

The following practices should be implemented to minimise noise impacts.

#### 1.3.1 General Site Activities

- All waste handling, sorting, shredding activities are to be undertaken inside the building.
- Regular inspections shall be conducted in accordance with the Weekly Inspection Procedure to identify areas of potential noise generation. Indicators may include:
  - ▶ Evidence of oil leaks or damage to equipment/vehicles;
  - ▶ Un-secured or damaged noise guards or equipment;
  - ▶ Noticeable, excessive or unusual sources of noise; and
  - ▶ General wear and tear of equipment.
- If problem areas of additional noise generation are identified, action should be taken to alleviate any additional noise as soon as practicable by site management.
- Noise shall be included in the awareness training and induction of staff and contractors.

#### 1.3.2 Equipment and Infrastructure

- All waste handling, sorting and shredding activities are to be undertaken within the building.
- Close doors to building where possible while liquid waste transfer activities are undertaken.
- Preventative maintenance of all noise generating equipment including on-site plant and vehicles shall be undertaken. Maintenance should be undertaken in accordance with manufacturer's specifications.
- To minimise noise levels, site management shall endeavour to position any external noisy equipment behind structures to act as barriers. If this cannot be accomplished, equipment should be placed at the greatest distance from residential areas and orientated such that noise emissions are directed away from residential areas.

### 1.3.3 Vehicle Movements

- Liaise with drivers to ensure that they are aware of noise impacts on neighbouring receivers and that they adopt the recommended practices to minimise such problems.
- On-site vehicles to be maintained in accordance with a preventative maintenance program to ensure optimum performance and early detection of wearing or noisy components.
- Enforcing the following practices for on-site vehicle movements:
  - ▶ Low on-site speed limits (<10 km/h);
  - ▶ Minimise the use of truck exhaust brakes on site;
  - ▶ Minimising reversing distances and hence noise generated by reversing beepers;
  - ▶ No extended periods of on-site revving/idling.

The implementation of the above strategies should sufficiently minimise the potential for noise to cause annoyance at the nearest sensitive receptors.

## 1.4 NOISE COMPLAINTS

Any complaints received regarding noise pollution should be handled in accordance with the *Complaints Response Procedure* in the OEMP. Any noise complaint would trigger the need for monitoring as described in the following sections.

## 1.5 NOISE LIMITS

Noise limits stipulated in the development consent SSD-10407 are presented in the following table:

Table 1-2: Noise Limits dB(A)

Location	Day L <sub>Aeq</sub> (15minute)	Evening L <sub>Aeq</sub> (15minute)	Night L <sub>Aeq</sub> (15minute)
All residential receivers	47	43	38

## 1.6 NOISE MONITORING

Noise monitoring would be undertaken with Class 1 sound level meter/logger sets to comply with AS 1259 and was set on A-weighted, fast response. The microphone is to be positioned at 1.5 metres above ground level and fitted with a windsock. The instrument needs to be calibrated prior and subsequent to the measurement period to ensure the reliability and accuracy of the instrument sets. The instrument sets are also to be calibrated by a NATA accredited laboratory within two years of the measurement period.

Noise monitoring should be undertaken at the location of the complaint or best available location to adequately determine the noise at the location of the complaint.

The attended measurements are recommended to be undertaken with the following conditions:



- Where feasible when the background levels are predicted to be low;
- Wind speed <5 m/s; and
- No rainfall.

The measurements are recommended to be undertaken when the background levels are predicted to be low, with negligible wind and no rain during standard operational conditions.

Any exceedance to noise limits need further investigation is required to mitigate impacts.

Results of all noise monitoring undertaken need to be presented in a report and kept on record.

## **1.7 INSPECTION AND RECORDS**

A Weekly Inspection Checklist has been prepared to assist staff in checking that all procedures and equipment used to control and mitigate potential pollution are functioning effectively.

Any issues or non-conformances noted during workplace inspections must be recorded. Documentation for any corrective and preventative actions (e.g. CAR forms) must also be maintained, as described in the *Corrective and Preventative Actions* section of the OEMP. Any other relevant records must also be kept for inspection by regulatory authorities.





---

**PROCEDURE NAME:** STORAGE & HANDLING OF HAZARDOUS MATERIALS    **DATE:** December 2021

**PREPARED BY:** Benbow Environmental    **ISSUE NO.:** 1

---

## 2. STORAGE & HANDLING OF HAZARDOUS MATERIALS

### 2.1 PURPOSE

This procedure aims to outline aspects of the management of hazardous chemicals stored at the site in accordance with the relevant legislation. For information on specific chemicals, refer to the safety data sheet.

### 2.2 DEFINITIONS

#### **Bund**

*An embankment of earth, or a wall of brick, stone, concrete or other approved material which may form part or all of the perimeter of a compound.*

#### **Dangerous Goods**

*Substances that are listed in The Australian Dangerous Goods (ADG) Code or that meet the classification criteria specified in that Code.*

#### **Hazardous Chemicals**

*A substance, mixture or article that satisfies the criteria for a hazard class in the GHS (including a classification referred to in Schedule 6), but does not include a substance, mixture or article that satisfied the criteria solely for the following hazard classes:*

- a) acute toxicity – oral, dermal and inhalation – category 5;*
- b) skin corrosion/irritation – category 3;*
- c) serious eye damage/eye irritation – category 2B;*
- d) aspiration hazard – category 2;*
- e) flammable gas – category 2;*
- f) acute hazard to the aquatic environment – category 1, 2 and 3;*
- g) chronic hazard to the aquatic environment – category 1, 2, 3, and 4; and*
- h) hazard to the ozone layer.*

#### **Flammable Liquids**

*Liquids that are classified as Class 3 flammable liquids in The Australian Dangerous Goods (ADG) Code and classified as “Flammable Liquids” under the Global Harmonised System of Classification and Labelling of Chemicals (GHS) or that meet the classification criteria specified in that Code for flammable liquids. Flammable substances ignite on contact with ignition sources.*

#### **Hazardous substance**

*A substance which is toxic, harmful, corrosive, irritating, sensitising, carcinogenic, mutagenic, teratogenic or radioactive.*



### **Safety Data Sheet (SDS)**

*A document that provides information on the identification, health hazards, precautions for use and the safe handling of specific chemical product, which complies with ASCC:2011 (1994).*

These data sheets are obtained from the supplier and provide essential information required to allow safe handling of hazardous substances at work. Employers must ensure that all employees have access to SDS and must encourage employees to read the SDS's for all hazardous substances, which they may encounter in their work.

All SDS's include the following information:

- Product name and classification by UN No., GHS category, hazard statement and signal word;
- Product identification including physical and chemical properties;
- Health hazard information detailing acute effects and first aid advice;
- Precautions for use;
- Safe handling information including storage and transport, spills and disposal and fire explosion hazards;
- Recommendation on the use of PPE; and
- Miscellaneous information.

The information in a SDS is very important and all members of staff must be familiar with the location of the SDS's and their contents. For new chemicals on site, an SDS must be provided from manufacturers and read by the staff.

### **Globally Harmonised System of Classification and Labelling of Chemicals (GHS)**

*A new classification system for hazardous chemicals based on the GHS came into effect as of the 1 January 2012, and the Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Code) was terminated after the 31 December 2016. The requirements of both the ADG Code and GHS are addressed in this procedure.*

### **Occupier**

*The person who has overall management or control of the workplace.*

### **Packing Group (PG)**

*One of three hazard groups into which dangerous goods (of Classes other than 1, 2, 6.2 & 7) are designated in the ADG Code, in decreasing order of hazard by the Roman numerals "I" (great danger), "II" (medium) and "III" (minor danger).*

### **Incompatible**

*In relation to substances or the containers in which such substances are kept, having the ability to react or combine with one another in a manner that increases the hazard of an individual substance, that could cause deterioration of any of those substances and increase the hazards presented by them, or that could increase the hazards in the event of fire.*

### **NOHSC**

*National Occupational Health & Safety Commission (NOHSC) now known as Safe Work Australia – website: <http://www.safeworkaustralia.gov.au>.*

### **PPE**

*Personal Protective Equipment.*



## 2.3 HAZARDOUS CHEMICALS STORED ONSITE

Hazardous chemicals on site are displayed in **Error! Reference source not found..**

The site will store small quantities of LPG, lime and sodium hydroxide. All of these chemicals will be stored in accordance with relevant Australian Standards. Storage locations are noted in the table.

Table 2-1: Chemical Storage

Product Name	Un No.	ADG/GHS	GHS Signal Word	Quantity Storage Capacity	Storage Type	Storage Location
LPG	1075	ADG: Class 2.1, Flammable gas GHS: Flammable gases, Category 1; Liquefied Gas (Low Pressure)	DANGER	200L	Cylinder	Locked in cage outside
Lime	Not regulated	ADG: Not regulated GHS: Serious Eye Damage / Eye Irritation: Category 1; Skin Corrosion/Irritation: Category 2; Specific Target Organ Systemic Toxicity (Single Exposure): Category 3	DANGER	100kg	Packages	Stored on Mezzanine Level
Sodium Hydroxide/ Caustic Soda	1823	ADG: Class 8 PGII Corrosive GHS: Corrosive to Metals - Category 1; Skin Corrosion - Sub-category 1B; Eye Damage - Category 1	POISON	40kg	Packages	Stored in chemical storage cabinet

The management of hazardous materials is regulated under the *Work Health and Safety Regulation 2017*. The regulation has two basic limits on storage quantities listed in Schedule 11; these are the Placarding quantity and the Manifest quantity. If the quantities of hazardous chemicals at the site exceed the Manifest quantity, notification to SafeWork NSW is required.

The facility would not require Notification to SafeWork as chemical quantities do not exceed the manifest quantities. However, the basic requirements of having a Manifest in place, an active Emergency Plan in use, sign posting and placarding of hazardous material storage containers would be implemented to assist site management and Fire and Rescue NSW.

## 2.4 PROCEDURE

### 2.4.1 Storage and Handling

- Hazardous materials would be stored separately and within approved containers/bunds.



- Hazardous material containers/bunds would be inspected for cracks and integrity weekly.
- If spillage occurs, act **immediately** in accordance with the *Spill Procedure*. Ensure that all spilled materials and materials used for clean-up are disposed of safely.
- All personnel engaged in the handling of hazardous chemicals shall be aware of the hazards involved and be trained in the use of personal protective equipment, its care and maintenance, actions to be taken in various emergencies, the properties of hazards associated with, the substances handled.
- A register of safety data sheets on all chemicals used or stored on site is to be maintained.
- All installations in which flammable or combustible liquids are stored shall be implemented in accordance with AS 1940–2017, *The storage and handling of flammable and combustible liquids*.
- Smoking would be prohibited on site.

#### **2.4.2 Disposal of Dangerous Goods/Hazardous Chemicals**

- Dangerous goods and hazardous chemicals that require disposal may be classified as hazardous waste and must be disposed of in accordance with the Waste Management Plan (Sub-Plan B2).
- Appropriate staff shall be designated with the responsibility for ensuring the safe disposal or recycling of empty containers.
- A designated area for waste chemical containers is to be maintained for adequate storage and handling. This area needs to be under cover/roofed and bunded. Labels indicating the contents of the area and containers needs to be provided.
- Spills of hazardous waste should be handled in accordance with the *Spill Procedure* (Procedure No. 3) and any relevant safety data sheets.

#### **2.4.3 Labelling**

- Labelling must follow Safe Work Australia's Code of Practice for the Labelling of Workplace Hazardous Chemicals (2018)
- Label must be kept exhibited in such a position as to be clearly legible by any person approaching or at the dangerous goods area.
- All lettering on the labels must be a minimum of 100 mm high in black on a white or silver background.



## 2.5 INSPECTION AND RECORDS

Any issues or non-conformances noted during weekly inspections must be recorded. Documentation for any corrective and preventative actions must also be maintained, as described in the *Corrective and Preventative Actions* section of the OEMP. Any other relevant records must also be kept of professional periodic inspections.



---

<b>PROCEDURE NAME:</b>	<b>SPILL PROCEDURE</b>	<b>DATE:</b>	<b>December 2021</b>
<b>PREPARED BY:</b>	<b>Benbow Environmental</b>	<b>ISSUE NO.:</b>	<b>1</b>

---

### 3. SPILL PROCEDURE

#### 3.1 PURPOSE

The purpose of this procedure is to ensure the containment of all spills on site to prevent the entry of spilled materials/debris into stormwater systems (and public waterways), reducing the risk of environmental pollution and exposure to breaches and penalties under environmental pollution legislation.

#### 3.2 DEFINITIONS

##### **The Environment**

*For the purpose of this procedure, the environment is defined to include air, soil, natural waterways, groundwater and surface water (including stormwater drainage system).*

##### **Environmental Incident/Release**

*An environmental incident/release is defined as any spillage, release, upset, out of limits operation, procedural violation, which potentially:*

- *Harms human health;*
- *May cause environmental harm; and*
- *May result in non-compliance with regulations, permits and/or intervention of environmental authorities or results in penalties or fines.*

##### **Minor Spillage**

*A minor spillage is one that can be contained quickly and efficiently using the provisions of the Spill Kits located at various points around the site. It is typically less than 50 L. A minor spill would not be expected to reach the stormwater system. If the minor spill does reach the stormwater system the same action as outlined for a major spill will need to be taken.*

##### **Major Spillage**

*A major spillage has the potential to leave the site and is characterised by the spillage of a quantity greater than 50 L. A spill of this size must be prevented from reaching the stormwater system, and requires the sealing of stormwater drainage pits and the stormwater outlets, which is necessary to isolate the site from surrounding waterways.*

##### **Safety Data Sheet (SDS)**

*A document that provides information on the identification, health hazards, precautions for use and the safe handling of specific chemical product, which complies with ASCC:2011 (1994).*



These data sheets are obtained from the supplier and provide essential information required to allow safe handling of hazardous substances at work. Employers must ensure that all employees have access to SDS and must encourage employees to read the SDS's for all hazardous substances, which they may encounter in their work.

All SDS's include the following information:

- Product name and classification by UN No., GHS category, hazard statement and signal word;
- Product identification including physical and chemical properties;
- Health hazard information detailing acute effects and first aid advice;
- Precautions for use;
- Safe handling information including storage and transport, spills and disposal and fire explosion hazards;
- Recommendation on the use of PPE; and
- Miscellaneous information.

The information in an SDS is very important and all members of staff must be familiar with the location of the SDS's and their contents. For new chemicals on site, an SDS must be provided from manufacturers and read by the staff.

### **3.3 EQUIPMENT**

To properly contain any spill it is important to know the name of the material (shipping and/or common name) and the type (solid, liquid, granulated), as well as the GHS classification or Dangerous Good class. It is also important to ensure the listed resources are present on site:

- SDS outlining any recommended method for containing the spill and preventing environmental damage.
- Spill control tools to contain and clean up spills, such as a Hazchem spill kit. Spill kits must include at least the following items: inert absorbent material, shovels, brooms, chemically resistant boots and gloves, disposal bags for contaminated waste and portable containment barriers. An additional spill kit specifically for flammable/combustible liquids must also be available on site.
- Spill control tools should be kept together at one location and communicated to all personnel. Signage should indicate the designated locations of the Hazchem spill kits/spill control tools.

### **3.4 PROCEDURES**

If a spill occurs on the site the following procedure is to be followed.

#### **3.4.1 For Minor Spillage**

- Take action to stop or reduce the source of the spill, or divert the flow to safe containment, to the extent that personal safety will permit;
- For spills of solid materials, the spilled material should be carefully returned to the appropriate waste container;



- Contain the spillage to minimise spread of material;
- Consult SDS for recommended clean-up procedure and follow these instructions. Use spill control tools to aid in clean-up procedure;
- Dispose of material and all contaminated material (including soil contaminated from liquid spill) according to the Disposal Procedure outlined in the SDS or contact a licensed waste contractor for assistance;
- Inform the Site Manager on the details of the spill; and
- Record details of the spill.

### 3.4.2 For Major Spillage

- Take action to stop or reduce the source of the spill, or divert the flow to safe containment, to the extent that personal safety will permit;
- For spills of solid materials, the spilled material should be carefully returned to the appropriate waste container;
- Contain the spillage to minimise spread of material. Materials should be directed to blind sumps and bunds monitored to ensure integrity and no escape of materials;
- Inform the Site Manager and/or Principal Contractor on the details of the spill;
- Consult SDS for recommended clean-up procedure;
- Under the direction of the Site Manager and/or with the assistance of the emergency response crews (if required), clean up the spill;
- Dispose of material and all contaminated material (including contaminated absorbent material and soil contaminated from liquid spill) according to the Disposal Procedure outlined in the SDS or contact a licensed waste contractor for assistance; and
- Record details of the spill.

### 3.4.3 Notifying Authorities

- Under section 148 of the Protection of the Environment Operations Act, 1997, there is a duty to report pollution incidents. Site Management is responsible for notifying the relevant authorities.
- Relevant authorities include one or more the following, depending on the type and extent of the spill:

1. DPIE (Planning Secretary)	in writing via the Major Projects Website
2. NSW Environment Protection Authority	131 555
3. The Ministry of Health	1300 066 055 (ask for Public Health Officer)
4. SafeWork NSW	13 10 50
5. Cumberland Council	(02) 8757 9000
6. Fire and Rescue NSW	1300 729 579

- The following provides guidance on notifying pollution incidents:
  - ▶ Any pollution incident that causes or threatens material harm to the environment must be notified immediately.
  - ▶ A 'pollution incident' includes a leak, spill or escape of a substance, or circumstances in which this is likely to occur.





- ▶ Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred.
- ▶ Notification must be given immediately after the person becomes aware of the incident.

### **3.5 INSPECTION AND RECORDS**

A Weekly Inspection Checklist has been prepared to assist staff in checking that all procedures and equipment used to control and mitigate potential pollution generated by site activities are functioning effectively.

Any issues or non-conformances noted during weekly inspections must be recorded. Documentation for any corrective and preventative actions must also be maintained, as described in the *Corrective and Preventative Actions* section of the EMP. Any other relevant records must also be kept of professional periodic inspections.



---

<b>PROCEDURE NAME:</b>	<b>WEEKLY INSPECTION</b>	<b>DATE:</b>	<b>December 2021</b>
<b>PREPARED BY:</b>	Benbow Environmental	<b>ISSUE NO.:</b>	1

---

## **4. WEEKLY INSPECTION**

### **4.1 PURPOSE**

The purpose of this procedure is to ensure an adequate level of environmental management at the site is maintained. The procedure can help determine whether action needs to be taken, in order to rectify any identified issues with the potential to cause environmental harm.

### **4.2 DEFINITIONS**

#### **Site Inspections**

*Inspections conducted using the Site Inspection Checklist provided to ensure a good environmental standard of the construction area is maintained.*

#### **Environmental Harm**

*Any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above includes any act or omission that results in pollution. (Ref: POEO Act)*

#### **Due Diligence**

*The systematic identification of the environmental risks and liabilities associated with an organisation's sites and operations.*

### **4.3 PROCEDURE**

- An Inspection Checklist is provided overleaf to be completed and recorded on a weekly basis. This information is used to ensure an adequate level of environmental management at the site is maintained. It is also used to determine whether action needs to be taken to rectify issues that have arisen that may have the potential to cause environmental harm.
- If any action is required, this should be decided at the discretion of the Site Manager.
- Any issues or non-conformances noted during site inspections must be recorded. Documentation for any corrective and preventative actions (e.g. CAR forms) must also be maintained, as described in the *Corrective and Preventative Actions* section of the OEMP. Any other relevant records must also be kept for inspection by regulatory authorities.



WEEKLY SITE INSPECTION CHECKLIST			GUIDE ONLY	
Inspected by:			Date & time:	
ITEM CHECKED	YES	NO	ACTION REQUIRED	SIGN
Is there any excessive noise from equipment or activities (or any noise complaints) from the site?				
Is there any excessive or unusual dust emissions or odour (or any complaints regarding dust) from the site?				
Is waste being stored in correct designated bins/bays/tanks?				
Is solid waste overflowing from bins/bays? (any waste outside designated areas?)				
Is there evidence of any spills or leaks within the storage areas, tanks or any other area of the site?				
Do all waste storage bins/bays/tanks have a unique identification number/name?				
Has the site been cleaned daily this week?				
Are any safety signs out of place, obstructed or missing?				
Are blind sump (stormwater) pits working and free of blockages/debris?				
Have any rain events caused overflow of stormwater onto the street? If so, sampling is required.				
Does the hardstand areas or blind sump pits contain any unsealed cracks, tears or joints?				
Is there any evidence of any dairy products or any other non-conforming waste been accepted on site?				
Is any dust/sediment being tracked from the premises?				
Is any equipment due for regular inspection and maintenance?				
Are all employees wearing the appropriate PPE?				
Are external areas free of items and in a tidy state?				
<b>OTHER</b>				
Is pollution Control Equipment in good working order?				
Is Firefighting equipment in good working order?				

**NEXT INSPECTION DUE IN 7 DAYS. DATE:...../...../.....**

Housekeeping      **Exceptional**      **Good**      **Average**      **Poor**      **Very Poor**  
(circle):

**Additional Comments / Actions Required:**

Further action required? (circle):      YES      NO      Signature:.....



**Enviro Waste Services Group** aims to reduce our impact on the environment by ensuring that environmentally responsible practices are embraced within our organisation.

In particular, we specifically undertake to:

- Ensure the environment is considered with regard to all aspects of our business planning and operations, consistent with sound business management practices.
- Meet, and where possible exceed the requirements of all relevant environmental legislation, regulations and licences.
- Identify, assess and manage environmental risk arising from our business activities.
- Implement strategies for reduction and/or prevention of noise, dust, fumes, fire, waste, water contamination, and water and electricity usage.
- Minimise the creation of waste, recycle waste generated whenever possible, ensure hazardous waste and environmentally sensitive material are effectively contained and dispose of residual waste materials in an environmentally acceptable manner.
- Educate our employees and contractors to create awareness of environmental issues, ensuring that this awareness translates into work practices being carried out in an environmentally responsible manner, and is integrated into training, decision making and performance assessment.
- Keep abreast of emerging environmental management practices and adopting wherever possible changes to our business systems and processes as appropriate.
- Ensure sufficient resources are provided to meet the objectives of this policy.



Simon Saba  
General Manager  
July 2019





## Receptor Map





## Nearest Waterways





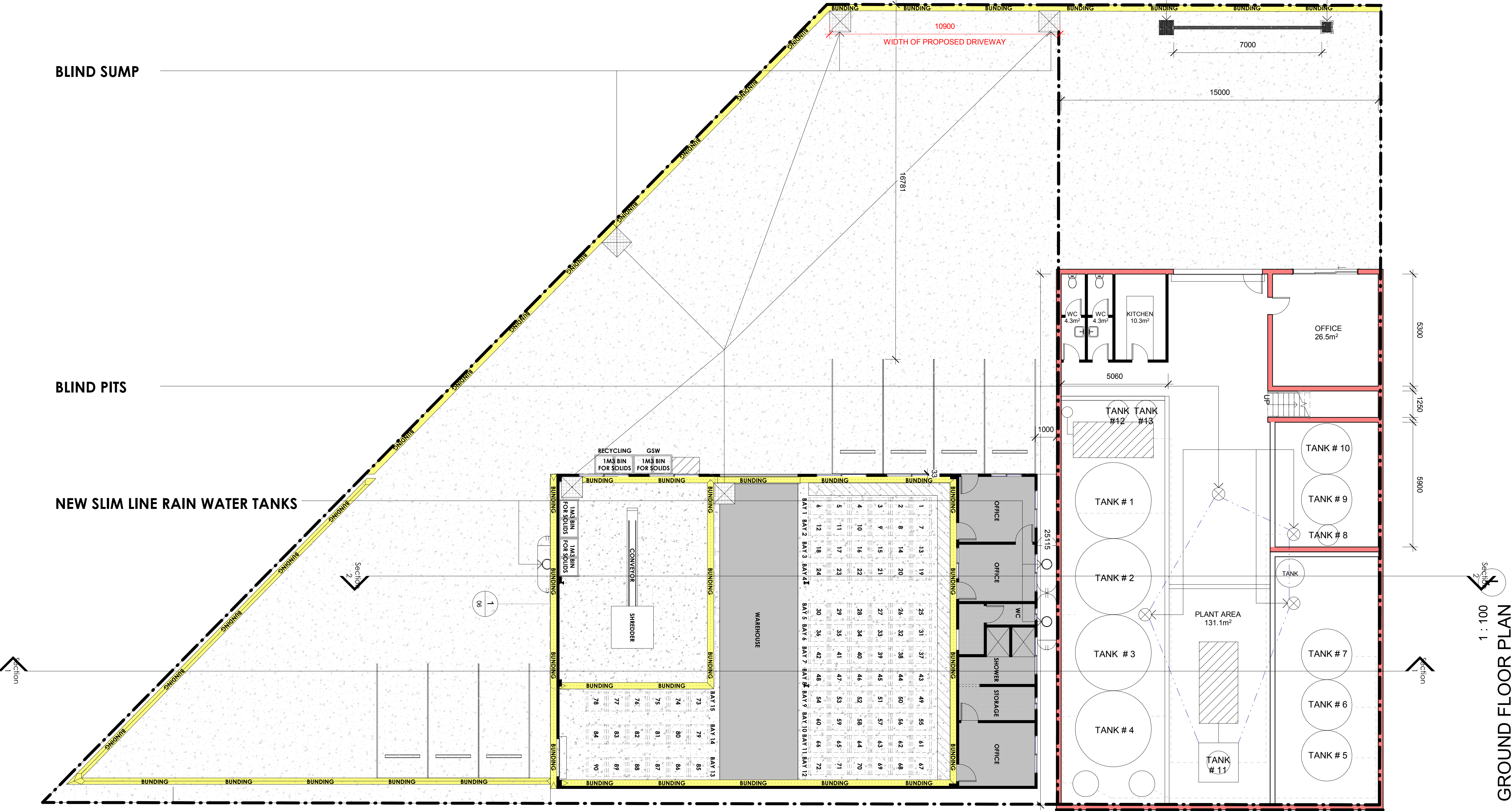
BUNG - CLOSING OFF DISCHARGE OUTLET

ISOLATED STORMWATER PITS AND GRATES

BLIND SUMP

BLIND PITS

NEW SLIM LINE RAIN WATER TANKS



GROUND FLOOR PLAN

1 : 100

Section 2

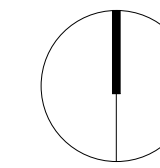
Section 1

FOR DA APPROVAL

REV	DESCRIPTION	DATE	BY
A	APPLICATION FOR APPROVAL	26 06 20	

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PROJECT TITLE			
PROPOSED INDUSTRIAL ALTERATION AND ADDITION			
14 - 16 Kiara Crescent, Yennora			
DRAWING TITLE			
FLOOR PLANS			
PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
20097	01	06/07/17	A
	SCALE @ A1	DRAWN BY	CHECKED BY
	1 : 100	GA	CB

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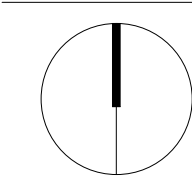
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1  
SITE PLAN

REV	DESCRIPTION	DATE	BY
A	APPLICATION FOR APPROVAL	26.06.20	



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PROJECT TITLE			
PROPOSED INDUSTRIAL ALTERATION AND ADDITION			
14 - 16 Kiara Crescent, Yennora			
DRAWING TITLE			
SITE PLAN			
PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
20097	02	06/26/20	A
SCALE @ A1		DRAWN BY	CHECKED BY
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[illegible]

PROJECT TITLE			
<b>PROPOSED INDUSTRIAL ALTERATION AND ADDITION</b>			
<b>14 - 16 Kiara Crescent, Yennora</b>			
DRAWING TITLE			
<b>DRAINAGE PLAN</b>			
PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
<b>20097</b>	03	06/26/20	A
	SCALE @ A1 1 : 100	DRAWN BY GA	CHECKED BY CB

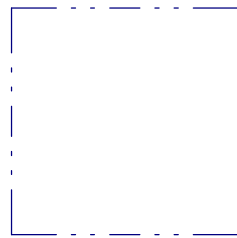
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**FOR DA APPROVAL**

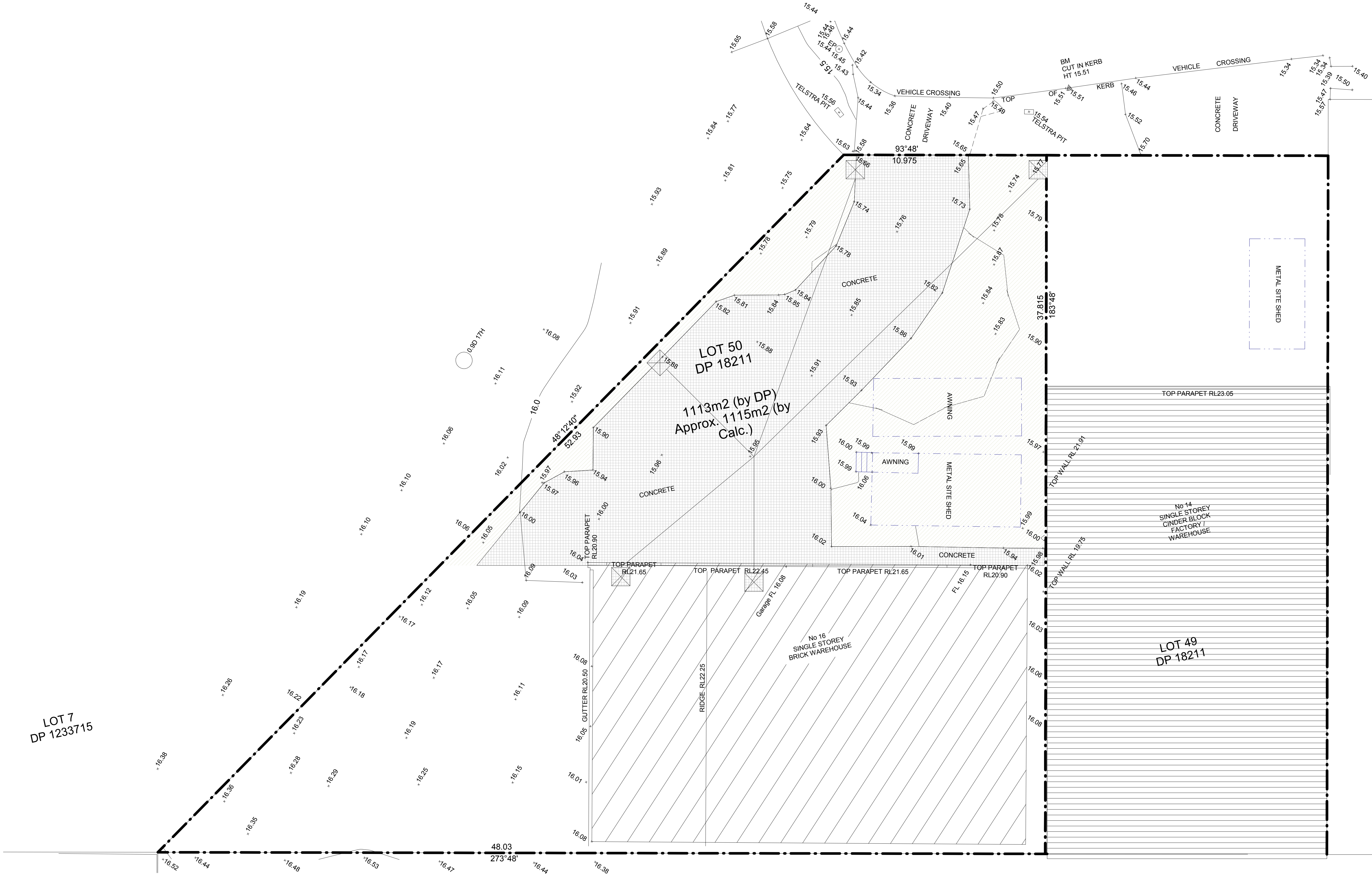


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DEMOLITION PLAN

REV	DESCRIPTION	DATE	BY
A	APPLICATION FOR APPROVAL	26 06 20	



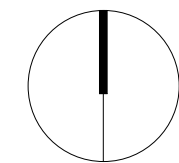
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FOR DA APPROVAL

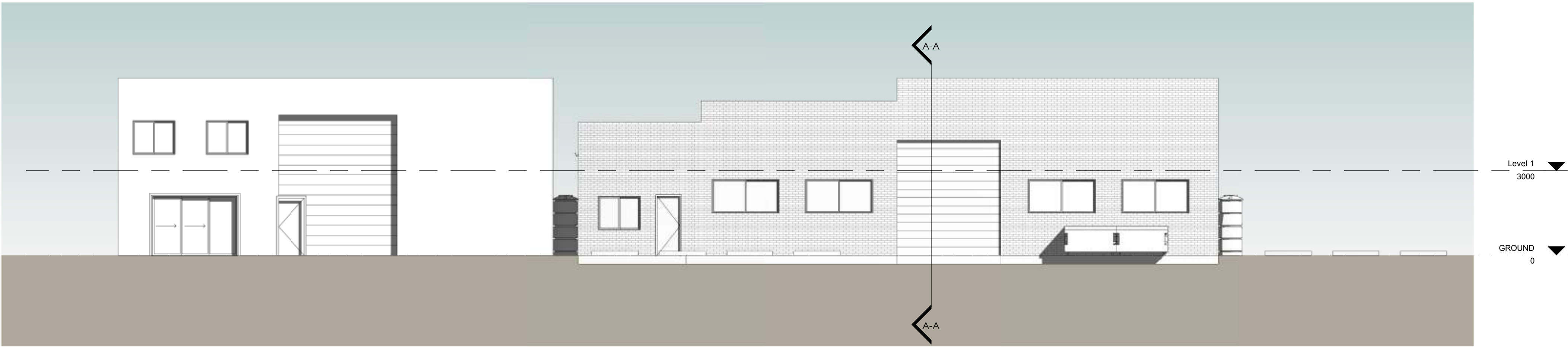
**baini**design

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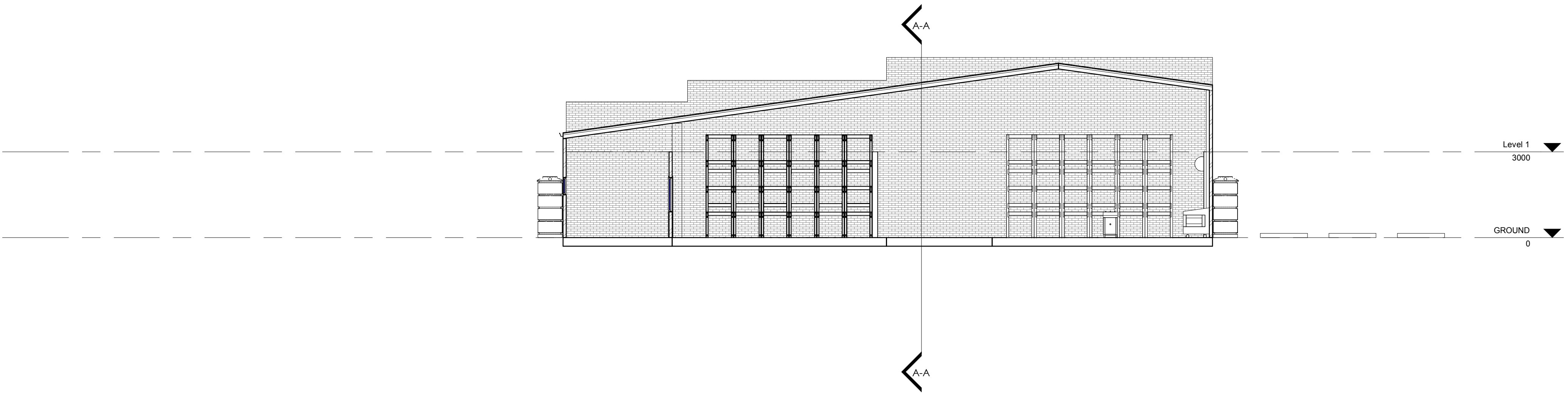


PROJECT TITLE <b>PROPOSED INDUSTRIAL ALTERATION AND ADDITION 14 - 16 Kiara Crescent, Yennora</b>			
DRAWING TITLE <b>DEMOLITION PLAN</b>			
PROJECT NUMBER <b>20097</b>	DRAWING NUMBER 04	DATE 06/26/20	REVISION A
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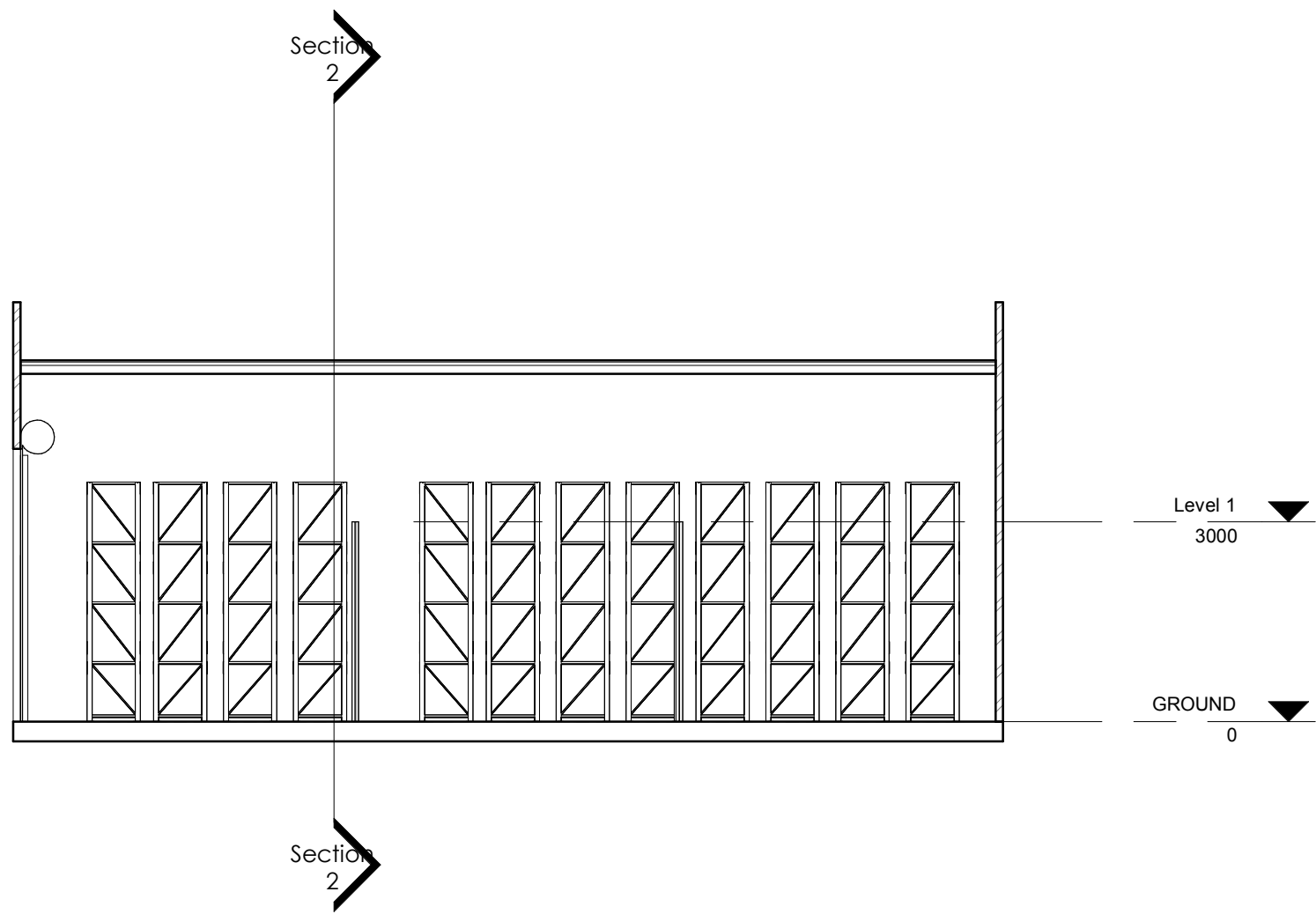
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2 WEST ELEVATION  
1 : 100



3 Section 2  
1 : 100



1 A-A  
1 : 100

REV	DESCRIPTION	DATE	BY

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PROJECT TITLE  
**PROPOSED INDUSTRIAL ALTERATION AND ADDITION  
14 - 16 Kiara Crescent, Yennora**

DRAWING TITLE  
**ELEVATIONS , SECTIONS**

PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
<b>20097</b>	05	09/04/20	
	SCALE @ A1	DRAWN BY	CHECKED BY
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1 SHREDDER DETAIL  
1 : 50



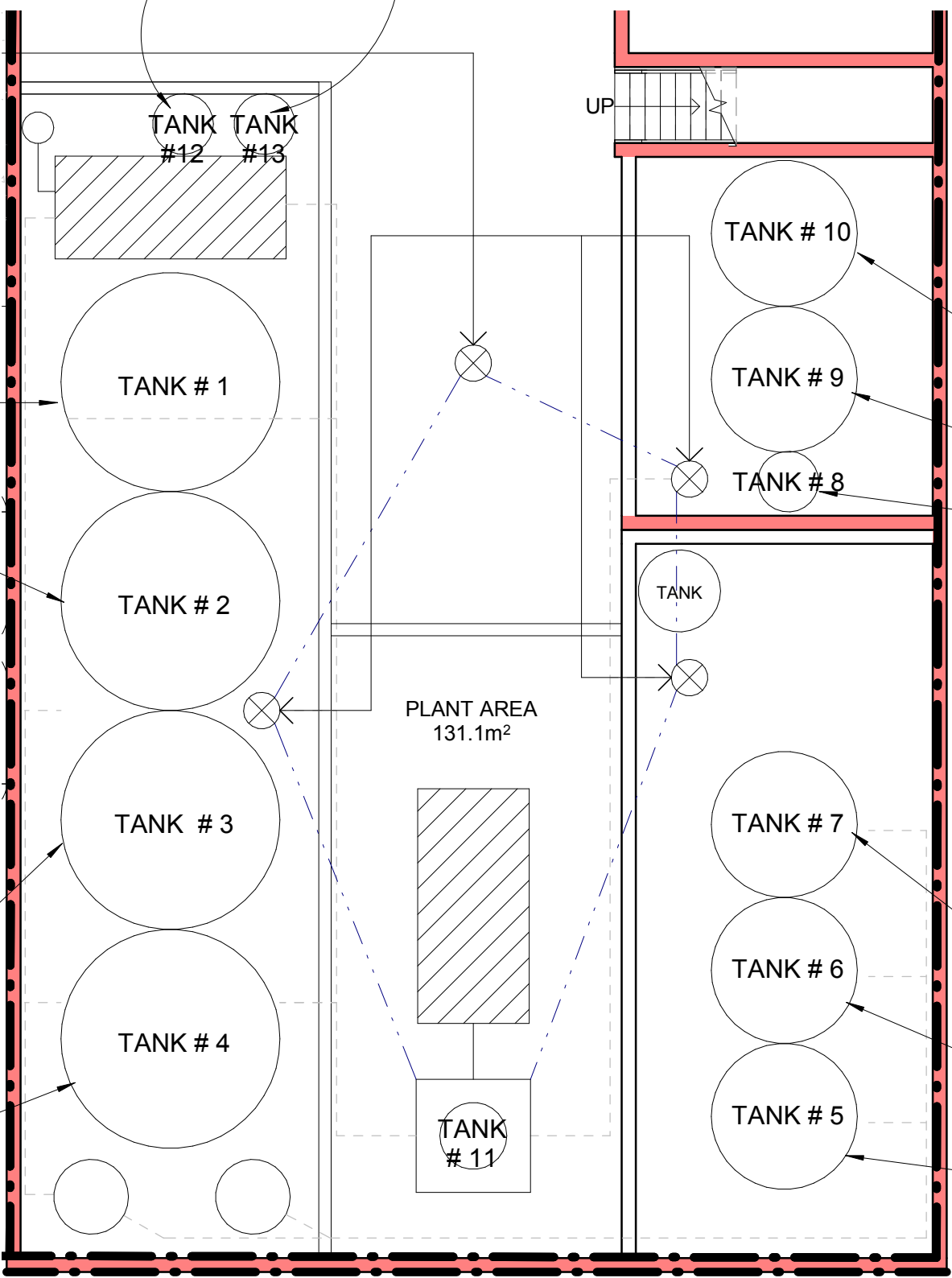
TANKS 1 & 2



TANKS 3 & 4



TANKS 12 & 13



2 TANKS DETAIL  
1 : 100



TANKS 8, 9 & 10



TANKS 5, 6 & 7

Tank 1  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants  
Liquid J120

Tank 2  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants

Tank 3  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants

Tank 4  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants

Tank 5/6  
Liquid J120

Tank 7 (settling)  
Liquid J120  
Liquid & sewer (K130) & stormwater

Tank 8/9  
Liquid J120

Tank 10  
Liquid grease trap waste

Tank 11-east  
Liquid J120

Tank 11-west  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants

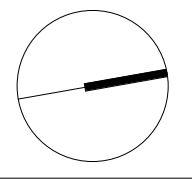
Tank 12  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants  
Liquid J120

Tank 13  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants  
Liquid J120

REV	DESCRIPTION	DATE	BY

**baini**design

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PROJECT TITLE  
**PROPOSED INDUSTRIAL ALTERATION AND ADDITION  
14 - 16 Kiora Crescent, Yennora**

DRAWING TITLE  
**TANK & SHREDDER DETAIL**

PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
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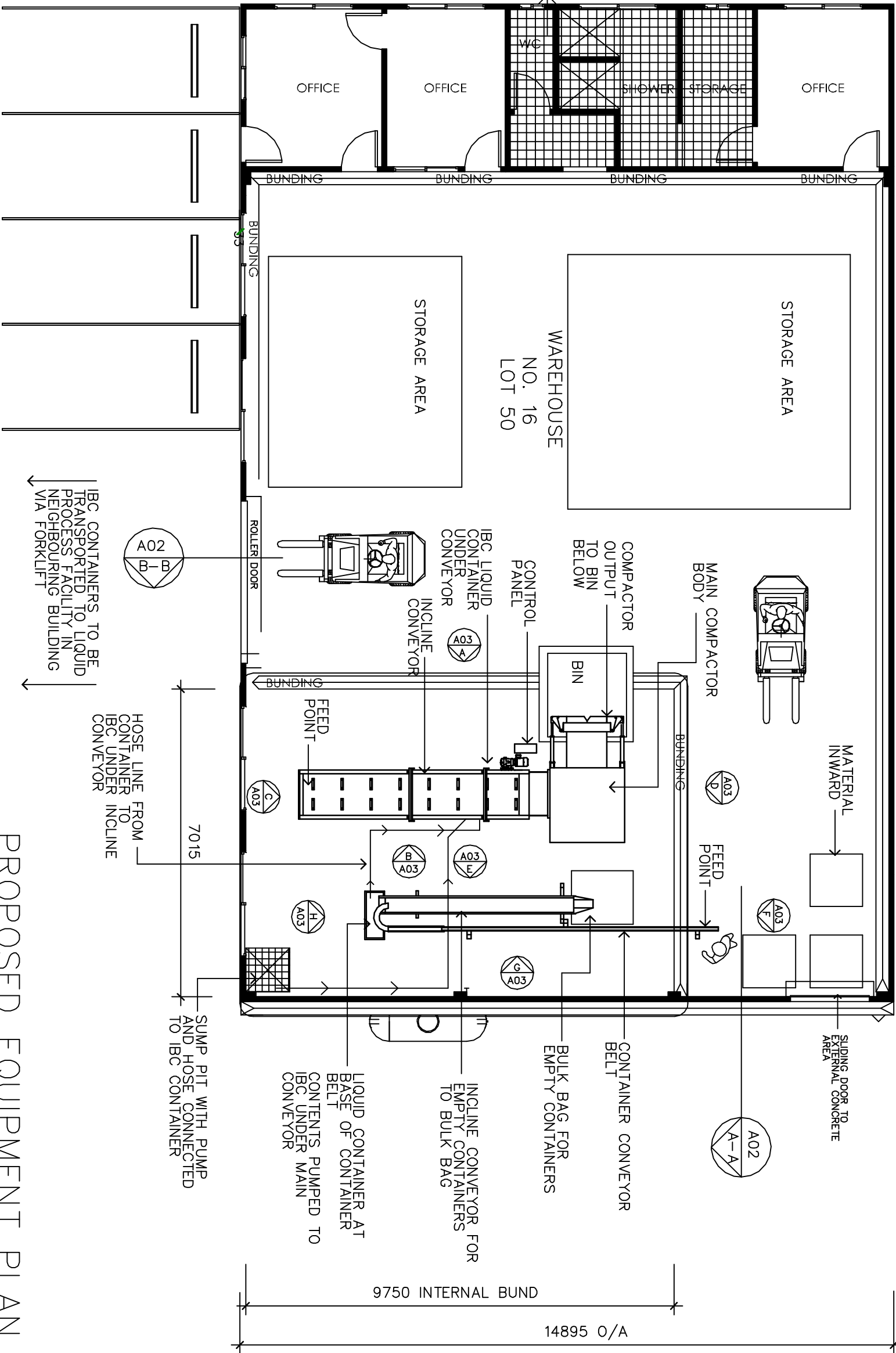
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**DRAFT**



22730

REAR BOUNDARY



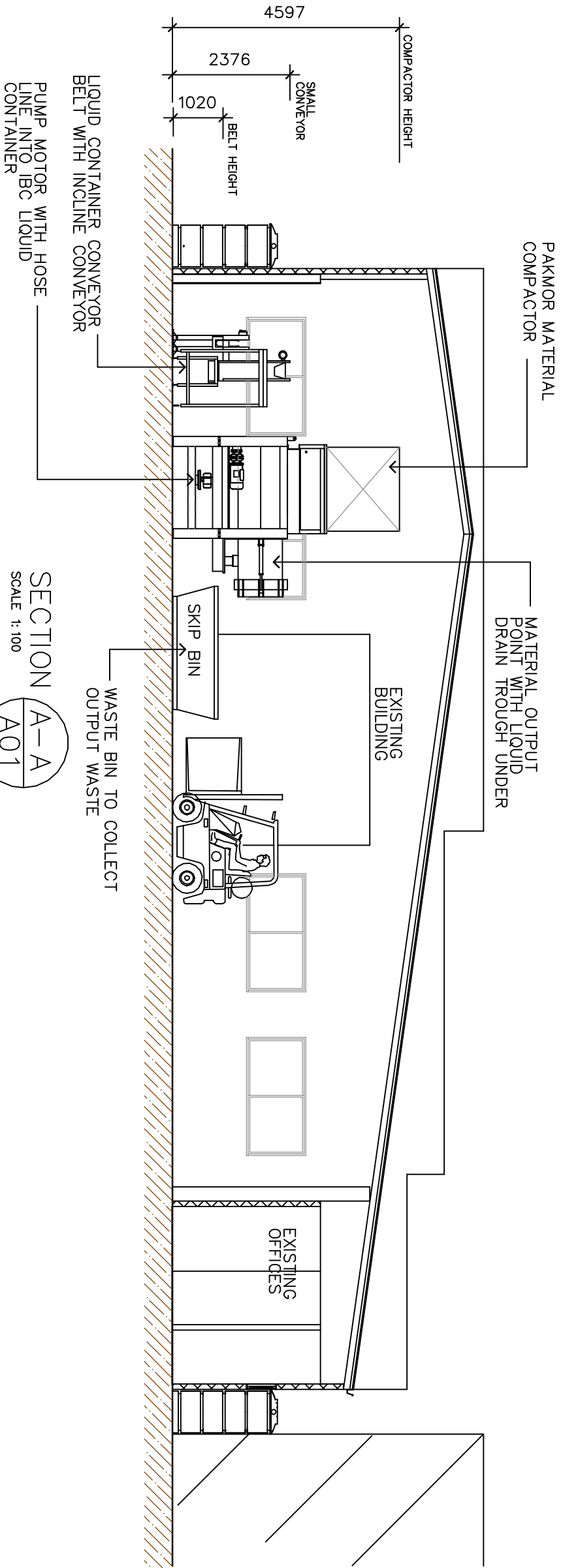
# PROPOSED EQUIPMENT PLAN

SCALE 1:100

NOTE: PLANS ARE TO BE READ IN CONJUNCTION WITH ARCHITECTURAL AND ENGINEERING BUILDING PLANS

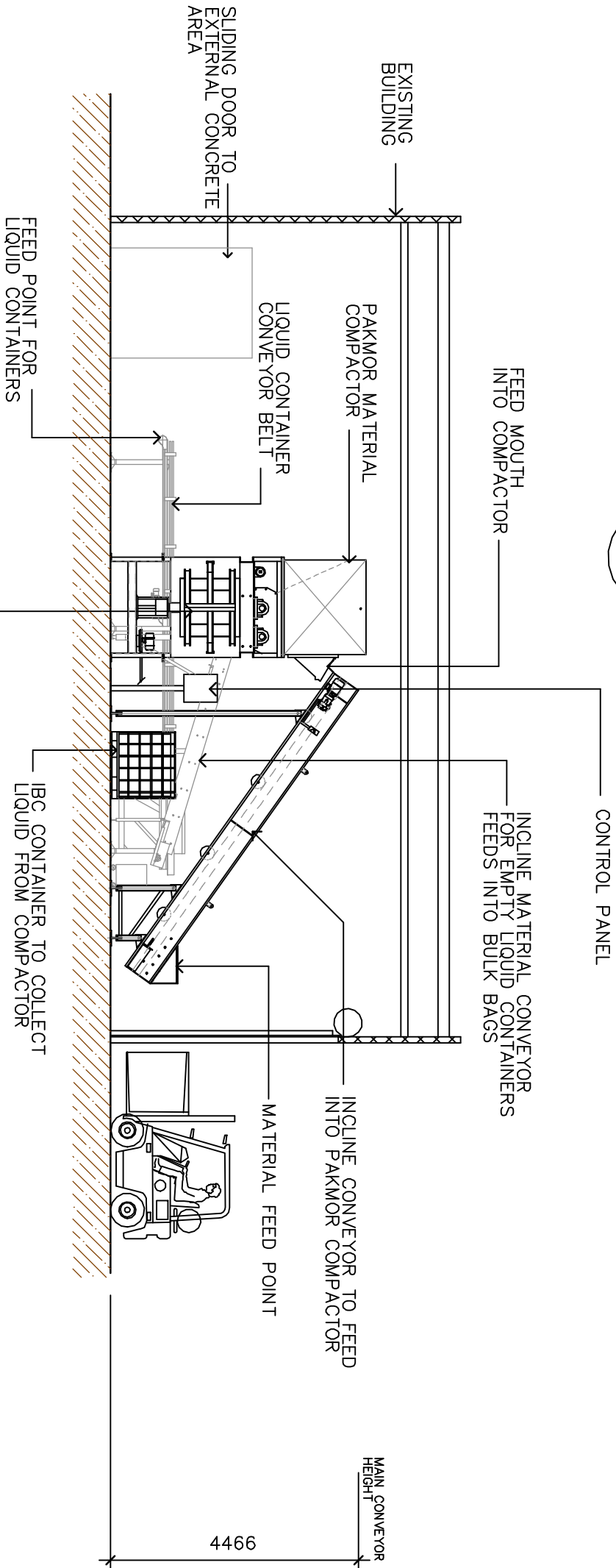
↑ KIORA CRESCENT ↓

ISSUE BY		DESCRIPTION	DATE	PROJECT NO.	
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				FLOOR PLAN	
				JOB NO.	
				1020/20	
				SHEET NO./ISSUE	
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SECTION B-B  
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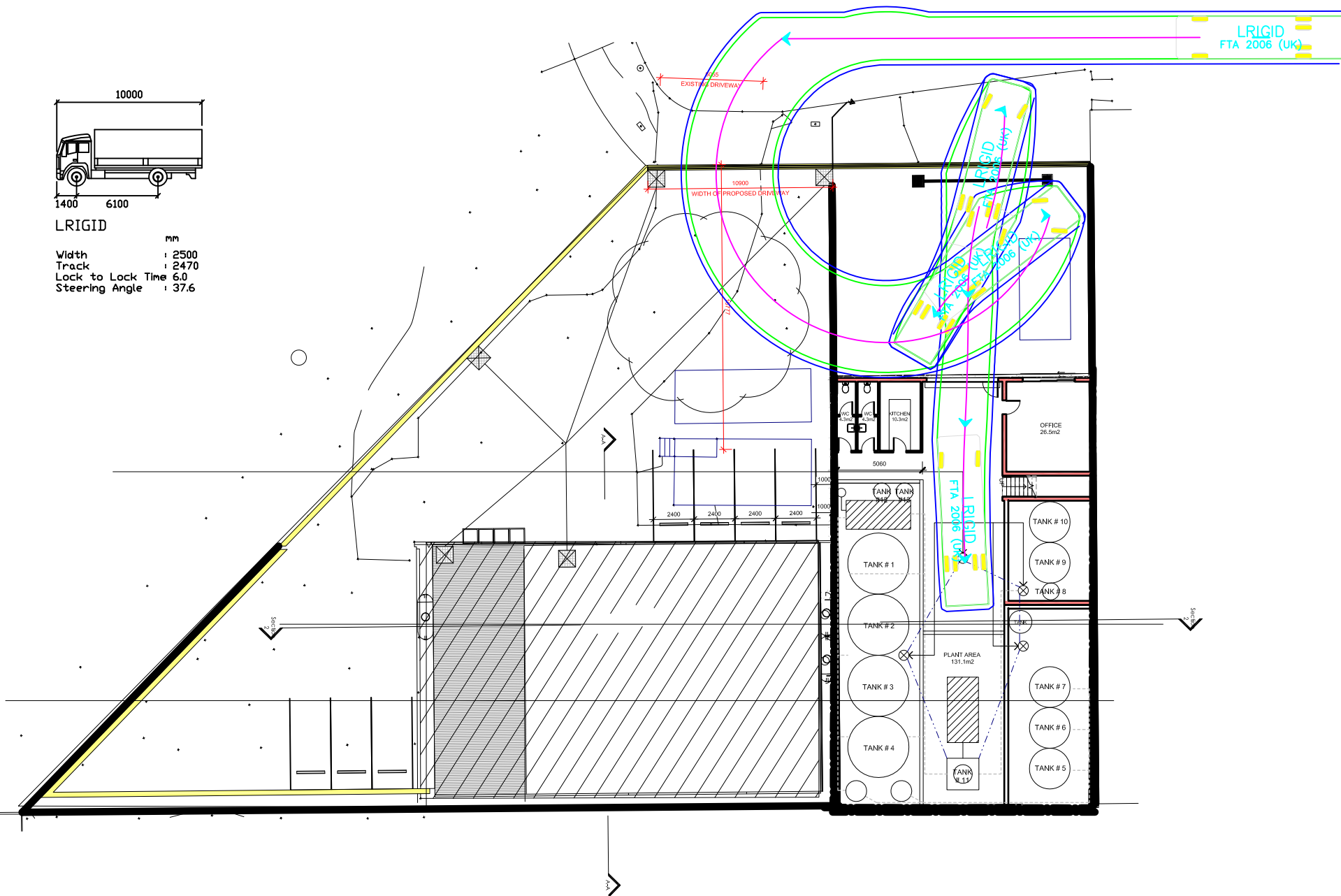
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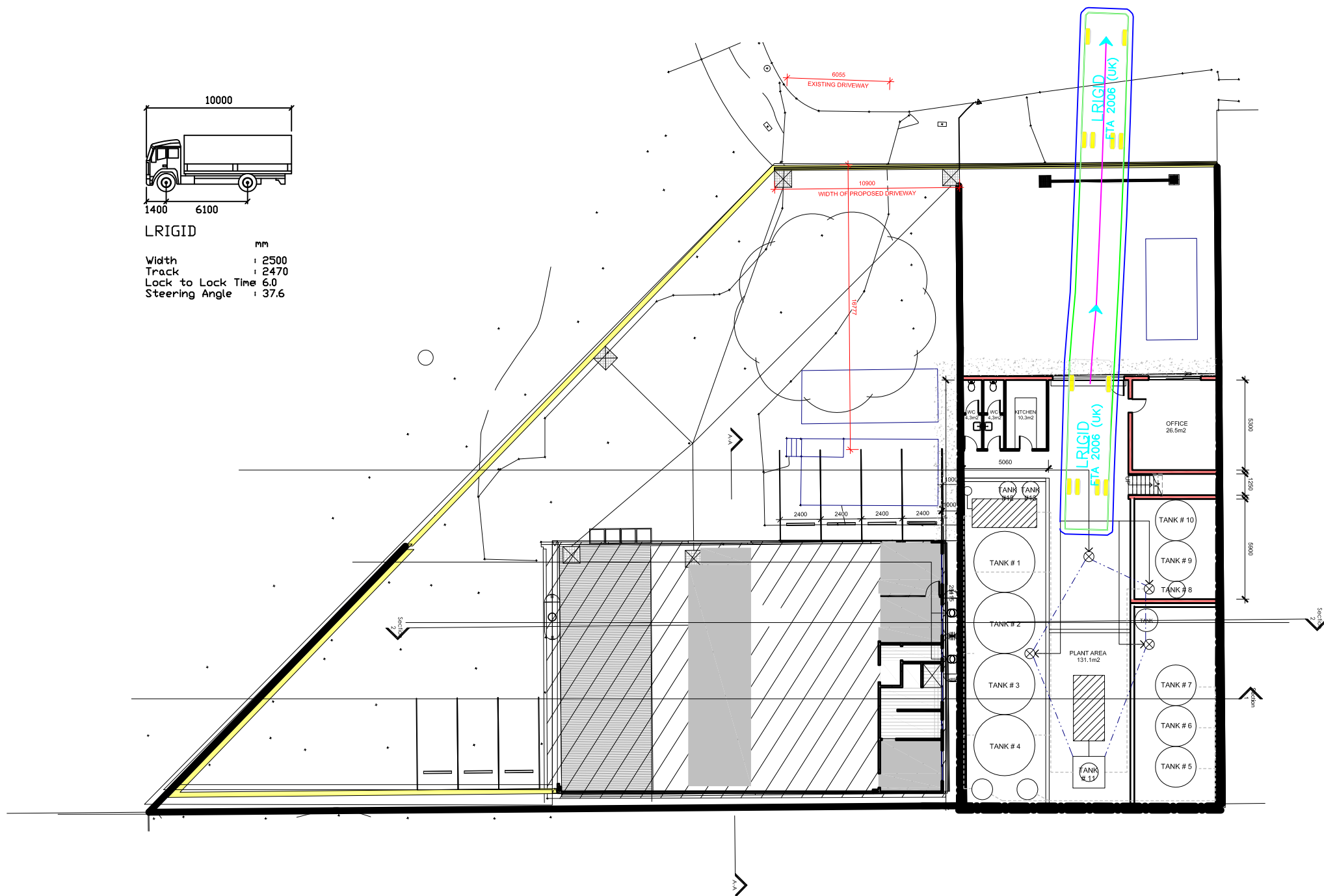
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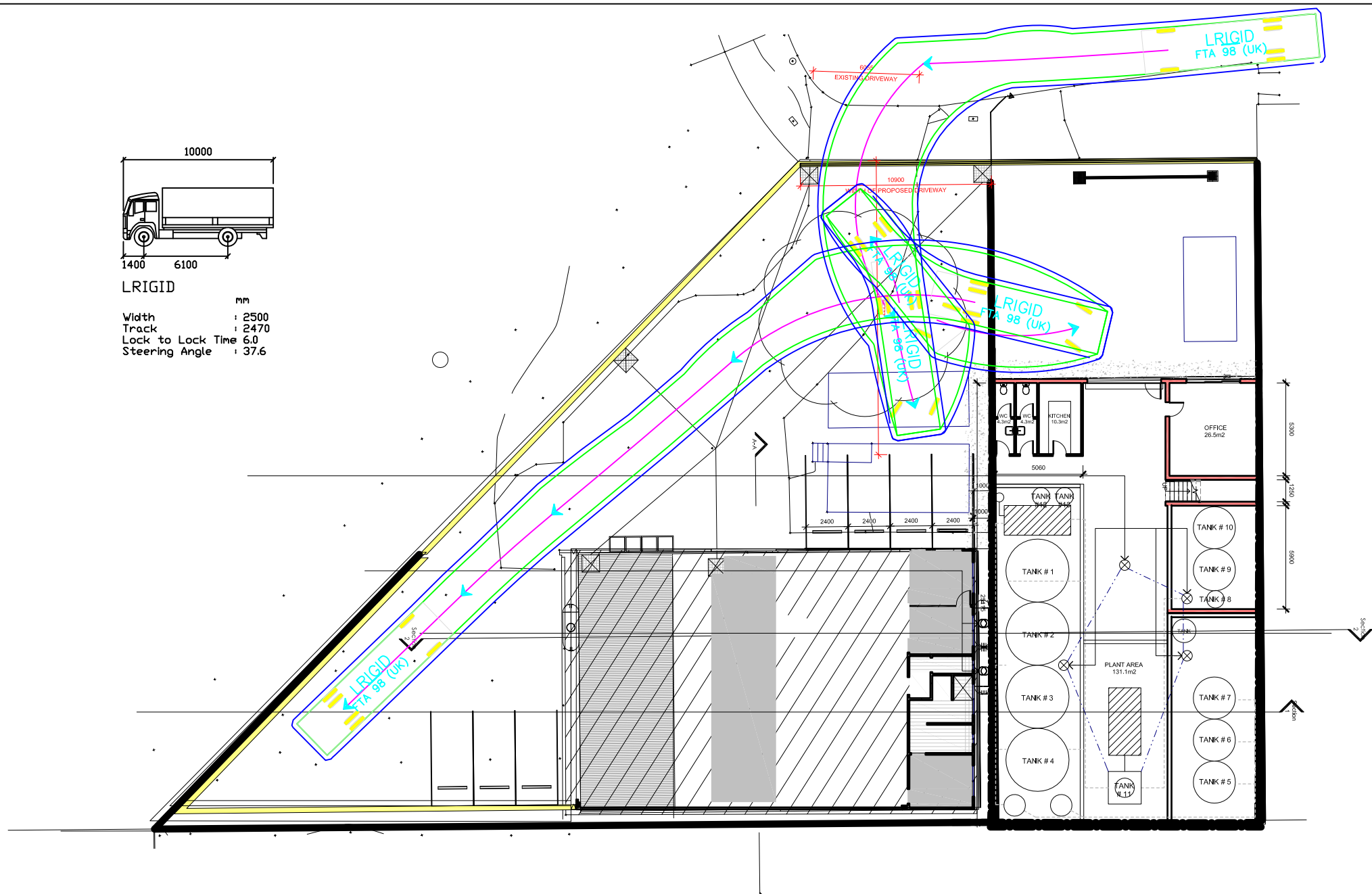
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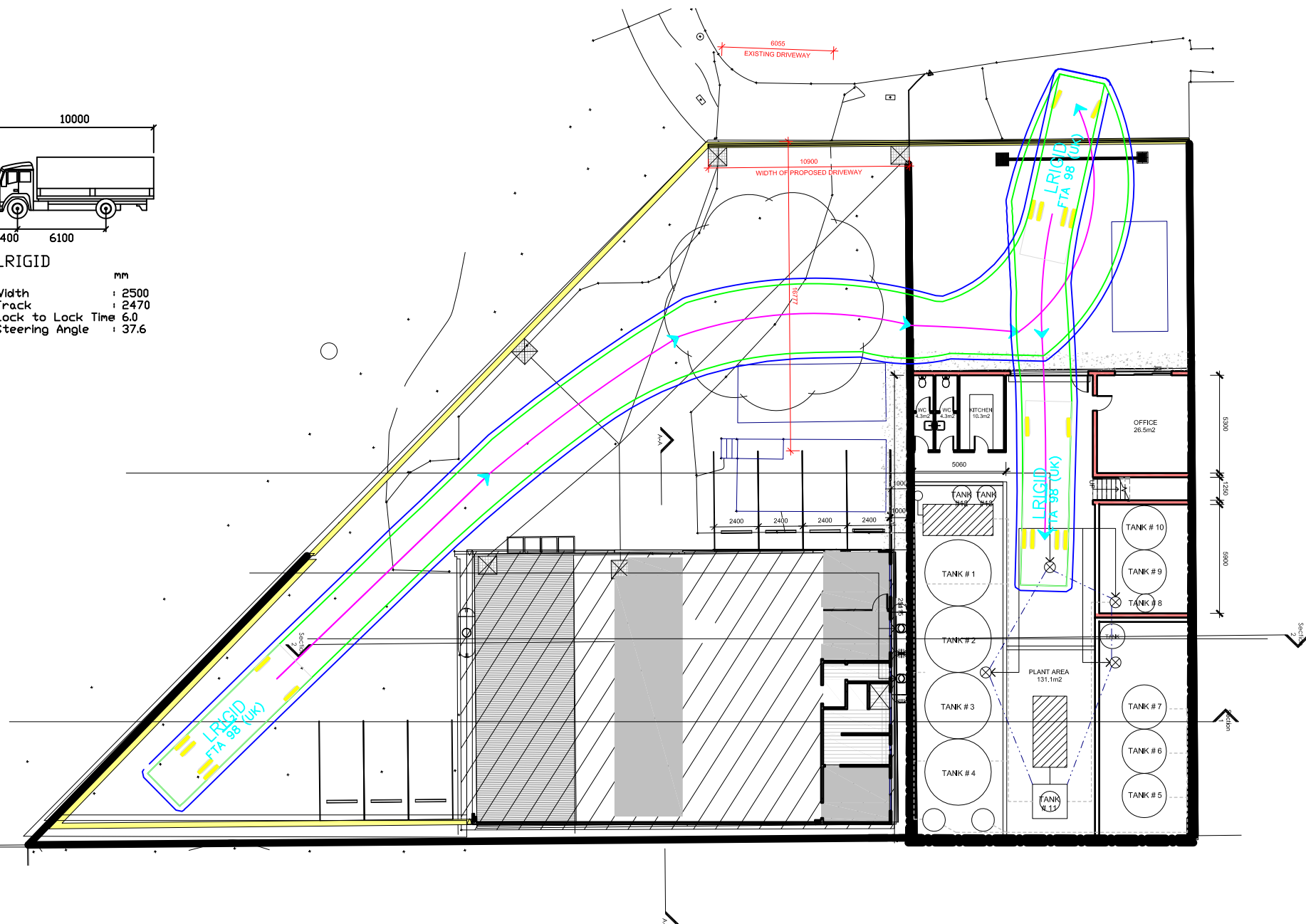


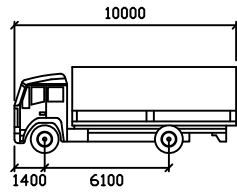
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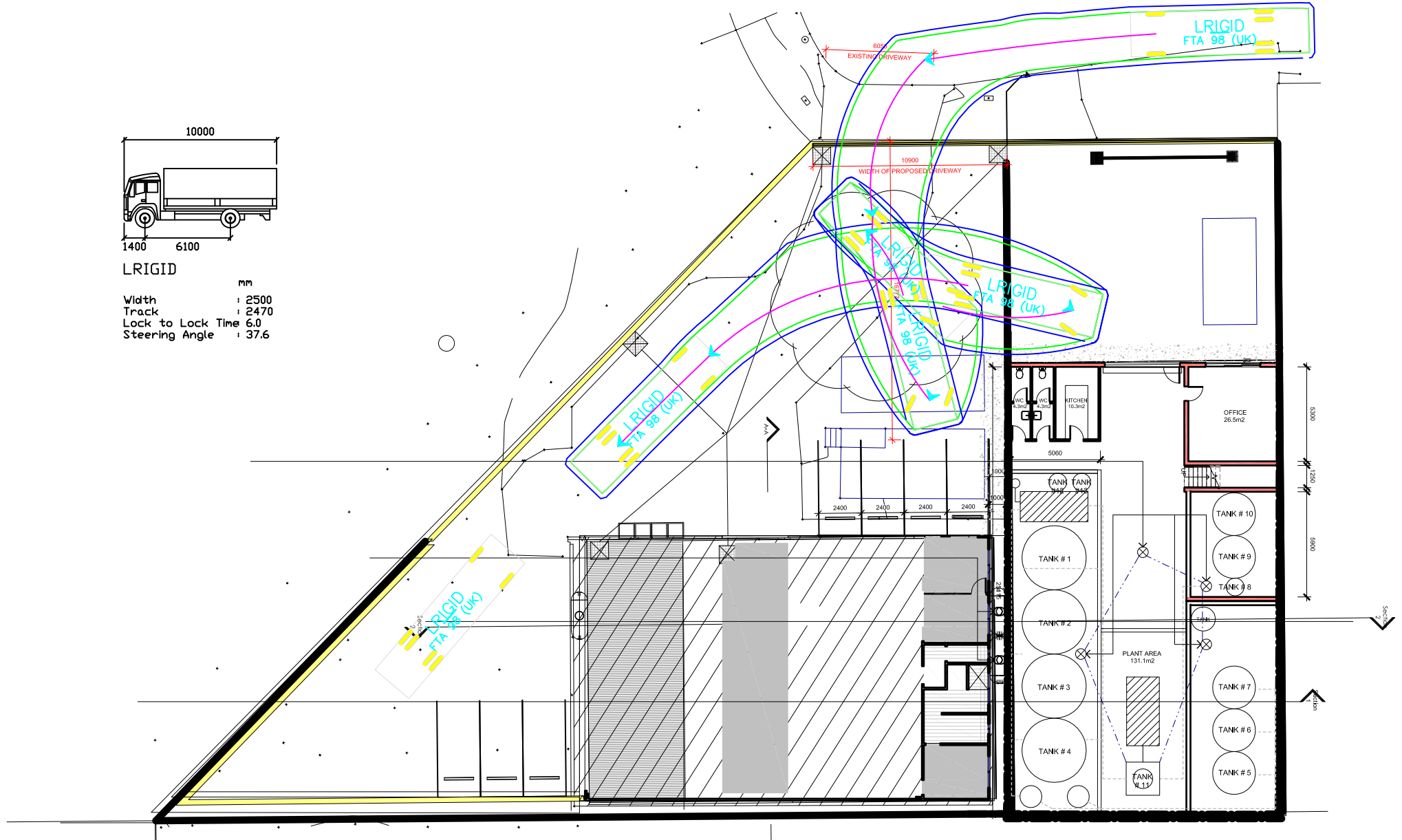




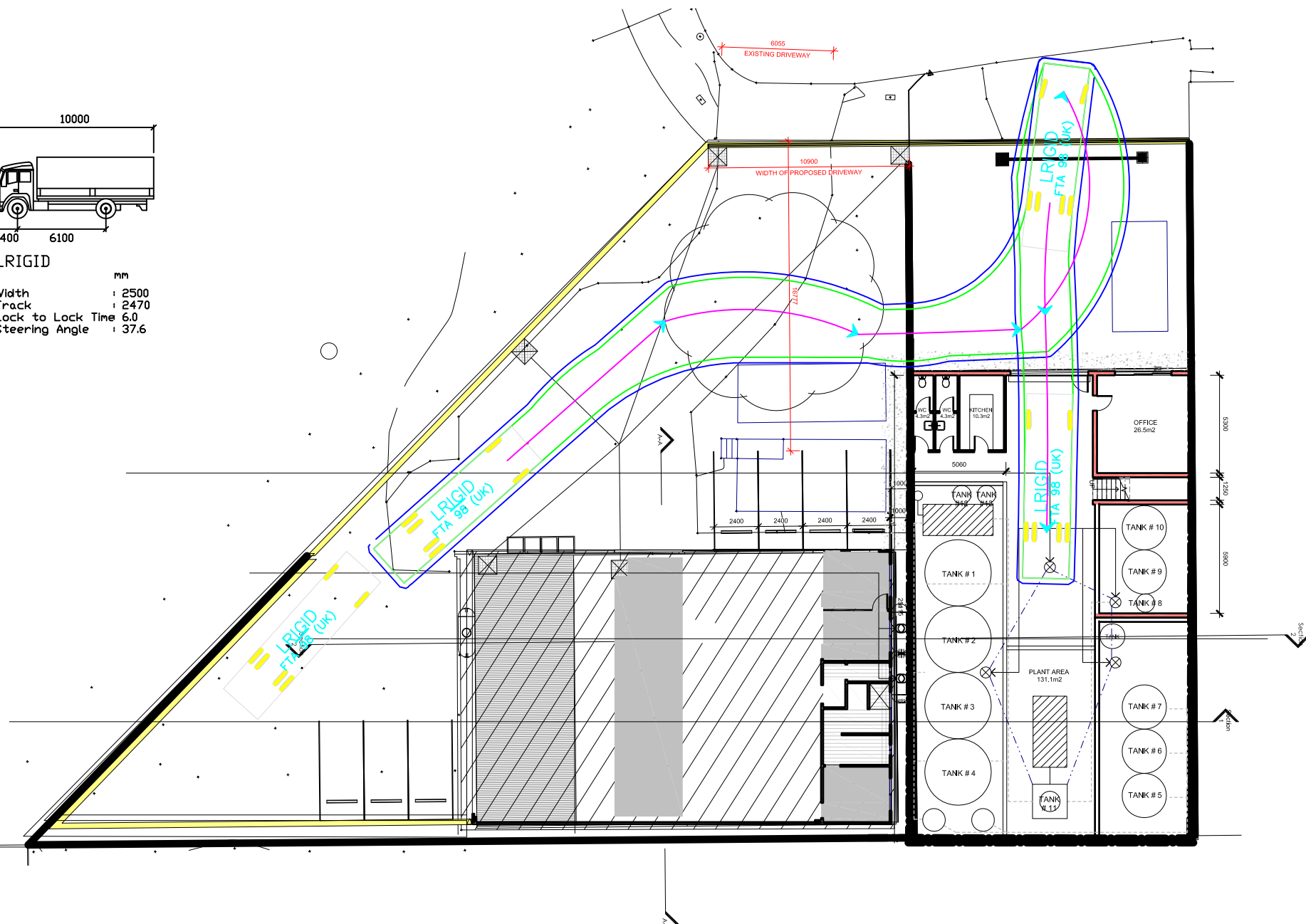


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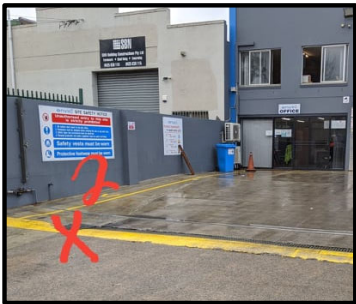




Monitoring Locations – 14-16 Kiora Crescent, Yennora



16 Kiora Cres



14 Kiora Cres



Source: NSW Planning Portal



Not to scale

LEGEND:



Site Boundary



Surface Water Monitoring Point



Air Monitoring Point (Biotrickling Filter Stack)



Benbow Environmental  
25-27 Sherwood Street,  
Northmead NSW 2152



## **SUB-PLANS**

## B1: Operation Traffic Management Plan and Parking Strategy

---

**OPERATIONAL TRAFFIC MANAGEMENT PLAN AND  
PARKING STRATEGY  
PREPARED FOR  
ENVIRO WASTE SERVICES GROUP PTY LTD  
14-16 KIORA CRESCENT, YENNORA NSW**

**Prepared for:** Enviro Waste Services Group Pty Ltd

---

**Prepared by:** Victoria Hale, Senior Environmental Scientist  
Emma Hansma, Senior Engineer  
Kate Barker, Senior Environmental Scientist  
R T Benbow, Principal Consultant

---

**Report No:** 191251-04\_OTMPPS\_Rev4  
June 2022  
(Released: 29 June 2022)



**Benbow**  
ENVIRONMENTAL

*Engineering a Sustainable Future for Our Environment*

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## GLOSSARY AND ABBREVIATIONS

AQOMP	Air Quality & Odour Management Plan
AMMAAP	Approved Methods for the Modelling and Assessment of Air Pollutants in NSW
AMSAAP	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW
BCA	Building Code of Australia
BOM	Bureau of Meteorology
Council	Cumberland Council
DPE	Department of Planning and Environment (formerly Department of Planning, Industry and Environment)
ECO	Emergency Control Organisation
EIS	Environmental Impact Statement
EP	Emergency Plan
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPL	Environment Protection Licence under the POEO Act
FR NSW	Fire and Rescue New South Wales
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.
Industrial liquid waste	Liquid wastes from industrial sources, including Waste Oil (J120), Surfactants (M250), Grease trap waste (K110), Sewage sludge and stormwater (K130), and Landfill leachate (N205), as described in the EIS.
Liquid food waste	Waste consumable liquids such as juices and soft drinks (but not including dairy products), including out-of-date liquids, as described in the EIS
Liquid product waste	Waste liquid products such as shampoos, soaps etc., including out-of-date liquids, as described in the EIS
LWTP	Liquid waste treatment plant
Material harm	Is harm that: <ul style="list-style-type: none"> <li>a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or</li> <li>b) 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)</li> </ul>
N/A	Not applicable
Non-compliance	An occurrence, set of circumstances or development that is a breach of consent SSD-10407.
NSW	New South Wales
OEMP	Operational Environmental Management Plan
OTMP	Operational Traffic Management Plan
OSD	On-site detention
PIRMP	Pollution Incident Response Management Plan
PM <sub>2.5</sub>	Particulate matter of size 2.5 µm
PM <sub>10</sub>	Particulate matter of size 10 µm
POEO Act	Protection of the Environment Operations Act 1997
RNP	NSW EPA Road Noise Policy
SEPP	State Environmental Planning Policy

SWMP	Surface Water Management Plan
TfNSW	Transport for New South Wales
WHS	Work, Health and Safety
WMP	Waste Management Plan

## **FOREWORD**

This Operational Traffic Management Plan and Parking Strategy has been prepared by Benbow Environmental's qualified environmental engineers and scientists and reviewed by Motion Traffic Engineer's Principal Traffic Engineer. The review is provided on the following pages.



**REVIEW OF PARKING STRATEGY AND OPERATIONAL MANAGEMENT  
PLAN FOR A LIQUID WASTE TREATMENT PLANT**

***14-16 Kiora Crescent in Yennora***

**Prepared for: BENBOW ENVIRONMENT**

N216726A (Version 1a)

January 2022

***Motion Traffic Engineers Pty Ltd***

***Telephone:***

***940 33588***

***[sydney@motiontraffic.com.au](mailto:sydney@motiontraffic.com.au)***

***ACN 600201583***

## 1. INTRODUCTION

Motion Traffic Engineers was commissioned by Benbow Environment to review the Parking and Operational Traffic Management Plan (Conditions B2 to B6) of the development consent for an approved liquid waste treatment plant at 14-16 Kiora Crescent in Yennora .

Benbow Environment has prepared “Operational Traffic Management Plan and Parking Strategy (January 2022)”

The Parking Strategy focuses on ensuring that trucks do not park on-street and that on-site truck parking impacts on the liquid treatment plan are managed within the site and not in public areas. The truck parking management plan is achievable and satisfies the Development Consent conditions.

The presence of an on-site traffic controller will assist in ensuring the success of the Operation Traffic Management Plan.

The site has seven on-site car spaces for staff. The number of car spaces are the same number of staff working. It is noted that visitor occurrences are rare.

An operational traffic management plan has been prepared.

The current arrivals and departures of trucks are low on an hourly basis. The increasing in capacity of waste treatment will lead to higher number of truck movements in a daily basis. However, it is not expected that maximum number of trucks per hour will change. Staff will need to continually monitor truck arrivals to avoid site congestion.

The Development Consent refers to a Driver Code of Conduct. A training course is to be provided for truck drivers adhere to Code of Conduct.

The “Operational Traffic Management Plan and Parking Strategy” is considered to meet the Development Consent Conditions.

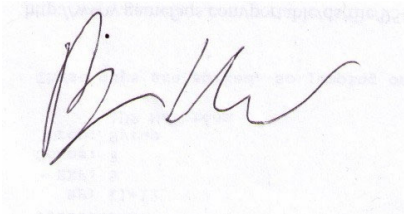
The success “Operational Traffic Management Plan and Parking Strategy” requires the continual involvement of Staff and Truck Drivers following the Code of Conduct and staff managing truck and car movements.

It is noted that the “Operational Traffic Management Plan and Parking Strategy” requires approval from the NSW Government Department of Planning, Industry and Environment.

**Benny Chen, Principal Traffic Engineer, MEngSc, MPublicPolicy.**

Benny has significant experience (16 years) with traffic impact assessments and transport planning, having previously worked for multi-disciplinary firms in Sydney, Canberra and London. He has skills in traffic engineering and carpark and driveway design and certification. He is very familiar with AS2890 series on car and vehicle parking. He has also extensive experience in preparing traffic impact assessment for Development Application approval to Council. Of significance to this project is his recent/current involvement with school related assessments associated with the federal government's Nation Building economic stimulus plan in Sydney.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'B. Chen', is written over a light blue grid background.

Benny Chen  
Principal  
**NSW Registered Engineer**

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## Attachments

- Attachment 1: Swept Paths
- Attachment 2: Interim Overnight Parking Plan
- Attachment 3: Email Correspondence



# 1. INTRODUCTION

Benbow Environmental has been engaged by Enviro Waste Services Group Pty Ltd (Enviro Waste) to develop an Operational Traffic Management Plan and Parking Strategy (OTMPPS), as required by the Development Consent SSD-10407 from the NSW Government Department of Planning, Industry and Environment for the Liquid Waste Treatment Plant located at 14-16 Kiora Crescent, Yennora NSW 2161.

The report has been prepared by the following suitably qualified Benbow Environmental consultants:

Victoria Hale  
Senior Environmental Scientist  
BSc (Biology), MQU

Kate Barker  
Senior Environmental Scientist  
BSc, UTS Sydney

Emma Hansma  
Senior Engineer  
BEng(Mech)(2A-Hons), UWA

The plan has also been reviewed by Motion Traffic Engineers as provided in the Foreword.

Enviro Waste will not commence operation until the OTMPPS is approved by the Planning Secretary and will operate the development in accordance with the approved OTMPPS.

## 1.1 PURPOSE AND OBJECTIVES

The purpose of this plan is to detail traffic generation and procedure as well as driver training and parking strategy to ensure that site processes are undertaken in accordance with regulatory requirements and in line with industry best practices.

The scope of this OTMPPS is limited to the following objectives:

- Summary of traffic generation;
- Detail traffic entrance and egress procedure;
- Procedure for truck driver training;
- Procedure for scheduling/booking vehicles arrivals;
- Procedure for traffic control officer receiving trucks on-site;
- Parking Strategy; and
- Plan Implementation and Administration

## 1.2 CONSENT CONDITIONS

The OTMPPS has been prepared in accordance with Part B, Conditions B3, B4, B5 and B6 and Part C Conditions C1, C5 and C6 of Schedule 2 of the Project Approval SSD-10407. These conditions of

consent are displayed in the tables below and the section indicated where the condition has been addressed.

Table 1-1: Project Approval SSD-10407 – Schedule 2, Part B, Conditions B5 and B6

Condition	Section of Document Addressing Condition
<p>B3. Prior to commencement of operation, the Applicant must prepare a Parking Strategy for the Development to the satisfaction of the Planning Secretary. The Parking Strategy must form part of the OTMP required by Condition B5 and the OEMP required by Condition C2 and must:</p> <ul style="list-style-type: none"> <li>a) be prepared in consultation with Council;</li> <li>b) detail the number and location(s) of parking spaces for all vehicles associated with the development, including any off-site locations;</li> <li>c) include a requirement for heavy vehicles to always use approved off-site parking, when available, in preference to onsite parking;</li> <li>d) provide details of contingency measures, such as restrictions in processing capacity or hours of operation of the LWTP or WPF, which are required when heavy vehicles are parked onsite, including triggers for measures and restrictions;</li> <li>e) include a firm commitment to adhere to any contingency measures and restrictions identified in (d) above, including any reduction in hours of operation;</li> <li>f) include a program to monitor the effectiveness of these measures; and</li> <li>g) if necessary, detail procedures for notifying neighbouring properties and Council of any potential disruptions to parking.</li> </ul> <p>The Parking Strategy must be revised to the satisfaction of the Planning Secretary in the event onsite or off-site parking arrangements are amended in the future.</p>	<p>1.3 7.1 and 7.2 4.2 7.2.1 7.2.1 8 8.2</p> <p>Yes</p>
<p>B4. The Applicant must:</p> <ul style="list-style-type: none"> <li>a) not commence operation until the Parking Strategy required by Condition B3 is approved by the Planning Secretary; and</li> <li>b) implement the most recent version of the Parking Strategy approved by the Planning Secretary for the duration of the development.</li> </ul>	<p>Yes</p>



Table 1-1: Project Approval SSD-10407 – Schedule 2, Part B, Conditions B5 and B6

Condition	Section of Document Addressing Condition
<p>B5. Prior to the commencement of operation, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C2 and must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s);</li> <li>(b) be prepared in consultation with Council;</li> <li>(c) detail the measures that are to be implemented to ensure road safety and network efficiency during operation;</li> <li>(d) detail the measures that are to be implemented to ensure delivery vehicle arrival times are appropriately staggered to ensure arriving heavy vehicles so not queue on the road network, including the use of a vehicle tracking system;</li> <li>(e) detail heavy vehicle routes, access and parking arrangements;</li> <li>(f) include a Driver Code of Conduct to: <ul style="list-style-type: none"> <li>(i) minimise the impacts on the local and regional road network;</li> <li>(ii) minimise conflicts with other road users;</li> <li>(iii) minimise road traffic noise;</li> <li>(iv) ensure truck drivers use specified haul routes; and</li> </ul> </li> <li>(g) include a program to monitor the effectiveness of these measures.</li> </ul>	<p>1</p> <p>1.3</p> <p>3</p> <p>3.4</p> <p>2.3 and 7</p> <p>4</p> <p>8</p>
<p>B6. The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the OTMP required by Condition B5 is approved by the Planning Secretary; and</li> <li>(b) implement the most recent version of the OTMP approved by the Planning Secretary for the duration of the development.</li> </ul>	<p>Yes</p>



Table 1-2: Project Approval SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
<p>C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> <li>(a) detailed baseline data;</li> <li>(b) details of: <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures and criteria; and</li> <li>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> </li> <li>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>(d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the development; and</li> <li>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</li> </ul> </li> <li>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</li> <li>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</li> <li>(ii) complaint;</li> <li>(iii) failure to comply with statutory requirements; and a protocol for periodic review of the plan.</li> </ul> </li> </ul>	<p>2</p> <p>1.2</p> <p>2.2</p> <p>2</p> <p>3</p> <p>8</p> <p>7.2.1</p> <p>8.4</p> <p>8.2</p> <p>8.3</p> <p>8.4</p>
<p><b>Note:</b> the Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	
<p>C5. Within three months of:</p> <ul style="list-style-type: none"> <li>(a) the submission of a Compliance Report under Condition C11;</li> <li>(b) the submission of an incident report under Condition C7;</li> <li>(c) the submission of an Independent Audit under Condition C13;</li> <li>(d) the approval of any modification of the conditions of this consent; or the issue of a direction of the Planning Secretary under Condition A2(b) which requires a review,</li> </ul> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing that a review is being carried out.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>

Table 1-2: Project Approval SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
C6. If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.	Yes
<b>Note:</b> This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	

### 1.3 CONSULTATION

A copy of Revision 2 of the OTMPPS was emailed to Bala Sudarson of Cumberland Council for review and to inform any discussions required. An email response was received on 1/02/2022 indicating that Council had no objection to the draft OTMPPS. The email correspondence is provided as Attachment 3.

On 23/05/2022, DPE requested additional information in a revised document as follows:

- Details of heavy vehicle routes/haul routes, as required by condition B5(e) of the consent;
- Clearly outline access arrangements for heavy and light vehicles, as required by condition B5(e) of the consent.

Revision 4 of this OTMPPS provides this additional information in Section 2.3.

## 2. SITE TRAFFIC DETAILS

### 2.1 TRAFFIC GENERATION

The majority of truck movements would be within the 6am to 7pm timeframe. Grease trap trucks would typically access the site between 12am to 4am. The minimum amount of time a truck will spend on site is 6 minutes (for a small 2,000 L tanker). The maximum amount of time a truck will spend on site is 28 minutes (for a 15,000 L tanker). No more than 3 heavy vehicles can enter and exit the site in an hour. The following distribution would be typical of a standard 24 hour period which if distributed over the site's existing fleet would accommodate 110,000 tpa.

Table 2-1: Truck Distribution

Time	Incoming trucks per hour	Outgoing trucks per hour
1:00	0	0
2:00	1	0
3:00	0	1
4:00	1	0
5:00	0	0
6:00	1	1
7:00	1	0
8:00	2	0
9:00	2	1
10:00	2	0
11:00	2	1
12:00	2	0
13:00	2	1
14:00	2	0
15:00	2	1
16:00	2	0
17:00	2	1
18:00	2	0
19:00	1	0
20:00	1	1
21:00	1	0
22:00	1	0
23:00	0	0
0:00	0	0
Total	30	8
		38

The maximum number of vehicles entering and leaving the site in any hour is three. These will be scheduled so that one vehicle enters, unloads/loads, and leaves the site, then another does the same, then another and another. So that during operations only one tanker truck is on site at any one time.

There is space to accommodate up to four trucks in the waiting bays so that if there are issues with the scheduling, unforeseen traffic delays etc when more than one tanker truck arrives onsite at the same time, they can go to the waiting bay and not wait in the street. The waiting bays are not theoretically required given the proposed quantities and loading and unloading times and will be used as minimally as possible.

It is feasible for a tanker truck to drive into the site and begin unloading/loading at 14 Kiora followed by a pallet truck arriving at 16 Kiora and unloading/loading simultaneously. Two additional tanker trucks could also wait in the waiting bay, making a total of 4 trucks on site at any one-time during operations; however as no more than three heavy vehicles can enter and exit the site in an hour, this would be highly unlikely to occur.

## 2.2 TRAFFIC IMPACT SIDRA SUMMARY

SIDRA software analysis for Level of Service (LoS) was provided for the intersections of:

- Priority intersection of Norrie Street with Kiora Crescent;
- Priority intersection of Loftus Road with Norrie Street;
- Priority intersection of Loftus Road with Yennora Avenue;
- Signalised intersection of Fairfield Road with Dursley Road; and
- Signalised intersection of The Horsley Drive with Polding Street.

Table 2-2 displays the SIDRA criteria for intersection operating performance.

Table 2-2: Level of Service (LoS) for intersections

LoS	Traffic Signal / Roundabout	Give Way / Stop Sign / T Junction control
A	Good operation	Good operation
B	Good with acceptable delays and spare capacity	Acceptable delays and spare capacity
C	Satisfactory	Satisfactory, but accident study required
D	Operating near capacity	Near capacity & accident study required
E	At capacity, at signals incidents will cause excessive delays.	At capacity, requires other control mode
F	Unsatisfactory and requires additional capacity, Roundabouts require other control mode	At capacity, requires other control mode

SIDRA analysis shows turn movements have a LoS A (good operation) for the priority intersections of Norrie Street with Kiora Crescent, Loftus Road with Norrie Street and Loftus Road with Yennora Avenue for the AM and PM peak hours.

Signalised intersections of Fairfield Road with Dursley Road and The Horsley Drive with Polding Street have a LoS of C and B and D and C for the AM and PM peak hours, respectively.

The additional trips do not change the LoS for any turn movement or the overall intersection. All intersections will have spare capacity.

In summary, the proposed development will be a low trip generator for the weekday AM and PM peak hours. The additional trips from the proposed expansion to an existing liquid waste facility can be accommodated at the nearby intersections without significantly affecting intersection performance, delays or queues.

## **2.3 HEAVY VEHICLE HAUL ROUTES AND ACCESS ARRANGEMENTS**

### **2.3.1 Haul Routes**

Heavy vehicles associated with site operation range in size, with the largest truck being a 10 m rigid truck. Haul routes for heavy vehicles are readily available within the surrounding industrial area and able to connect with major roads.

Heavy vehicles will be instructed to travel to and from the site via Norrie Street and Loftus Road to via Pine Road and Dursley Road to the external road network. Trucks servicing the site cannot use Byron Road and Military Road as both roads have a 5-tonne load limit and provide a narrowing of the carriageway through islands.

Direct routes to and from the site for heavy vehicles include:

Kiora Avenue to Norrie Street to Loftus Road to Pine Road to Dursley Road to Fairfield Road to McCredie Road to Sturt Street to A28 Cumberland Highway which provides access to the M4 Motorway, A22 Hume Highway and the M5 Motorway.

GML and CML networks from the site are shown in the following figures.

Figure 2-1: Heavy Vehicle Haul Routes

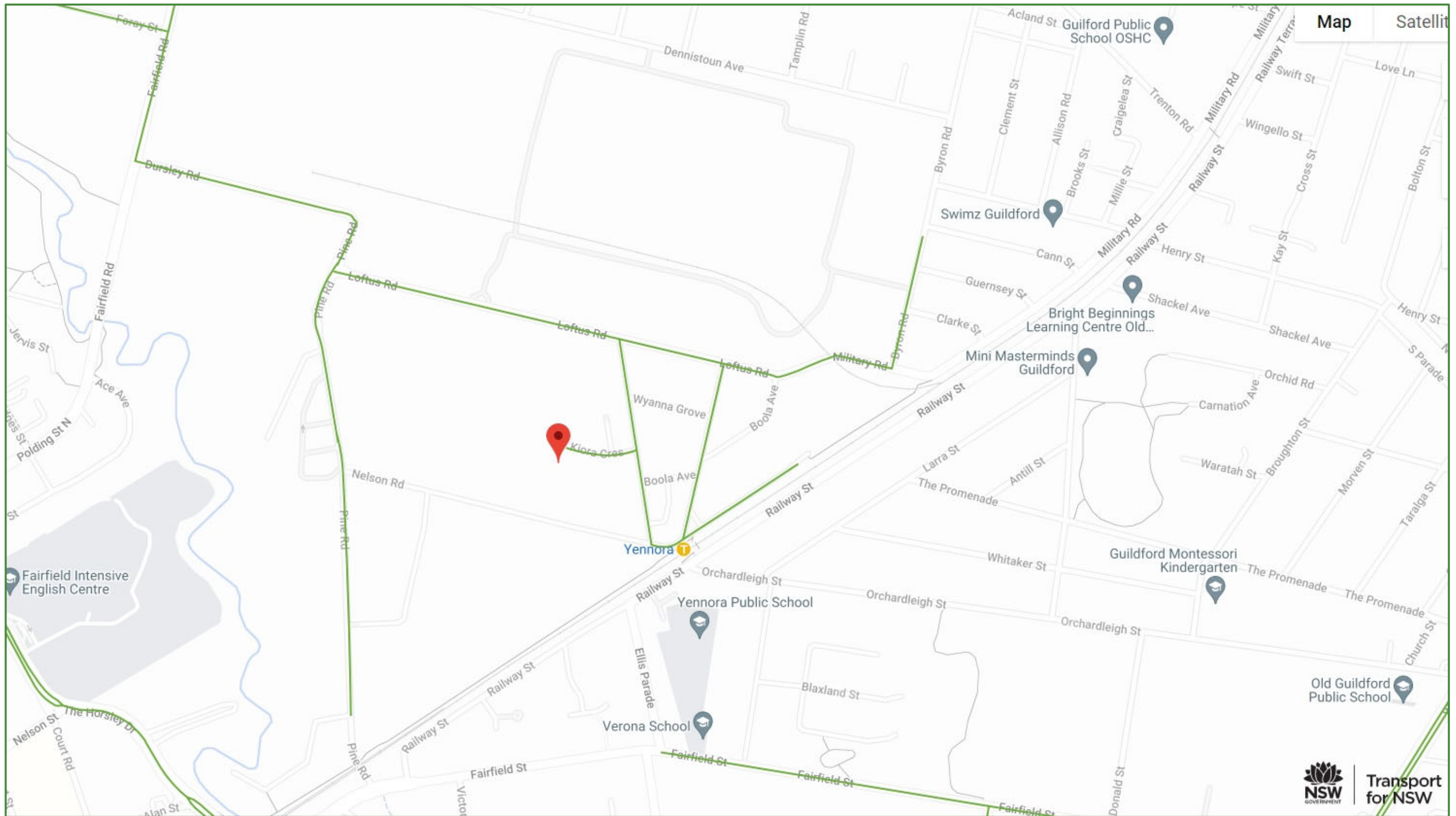
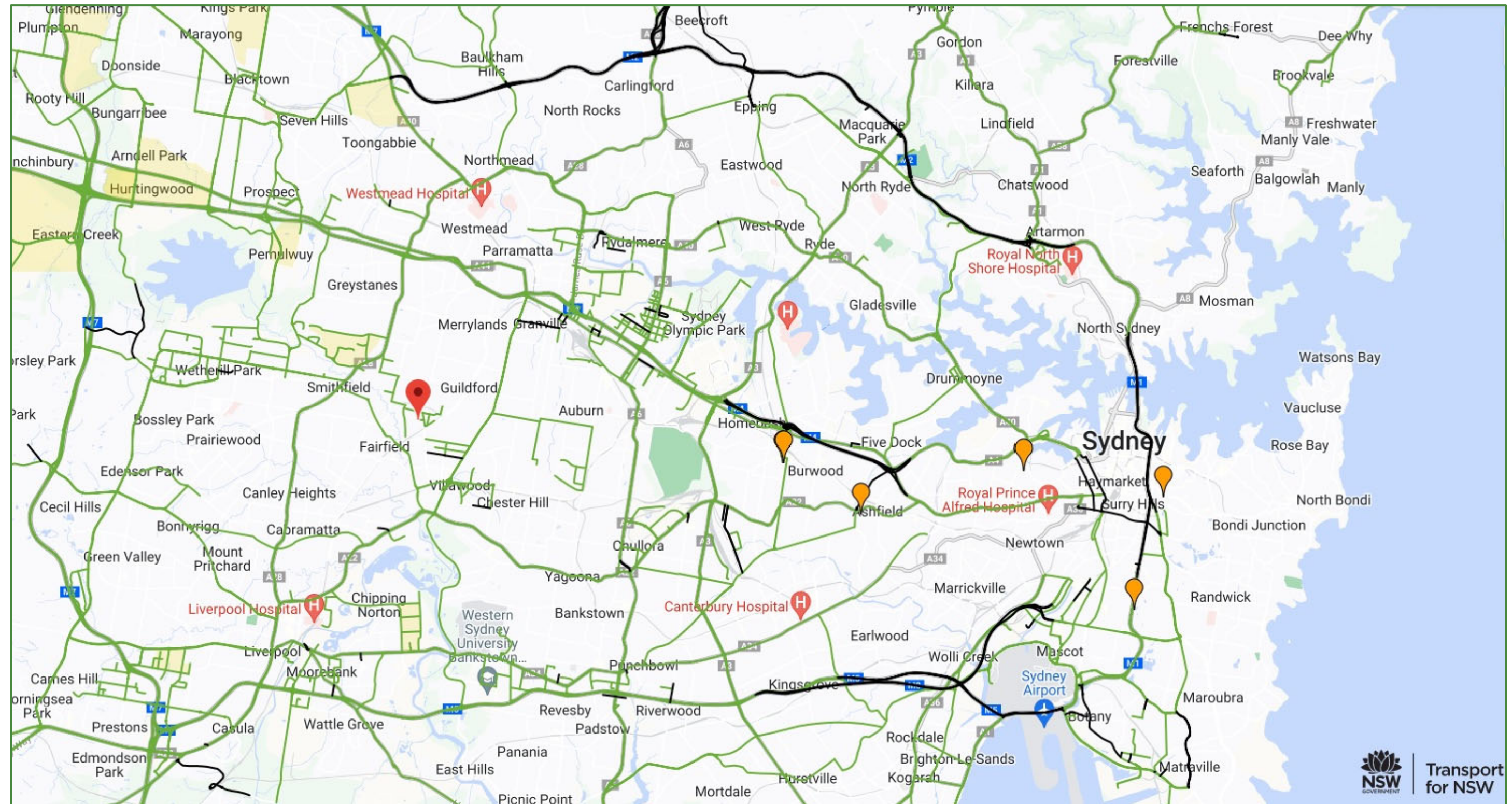




Figure 2-2: Heavy Vehicle Haul Routes

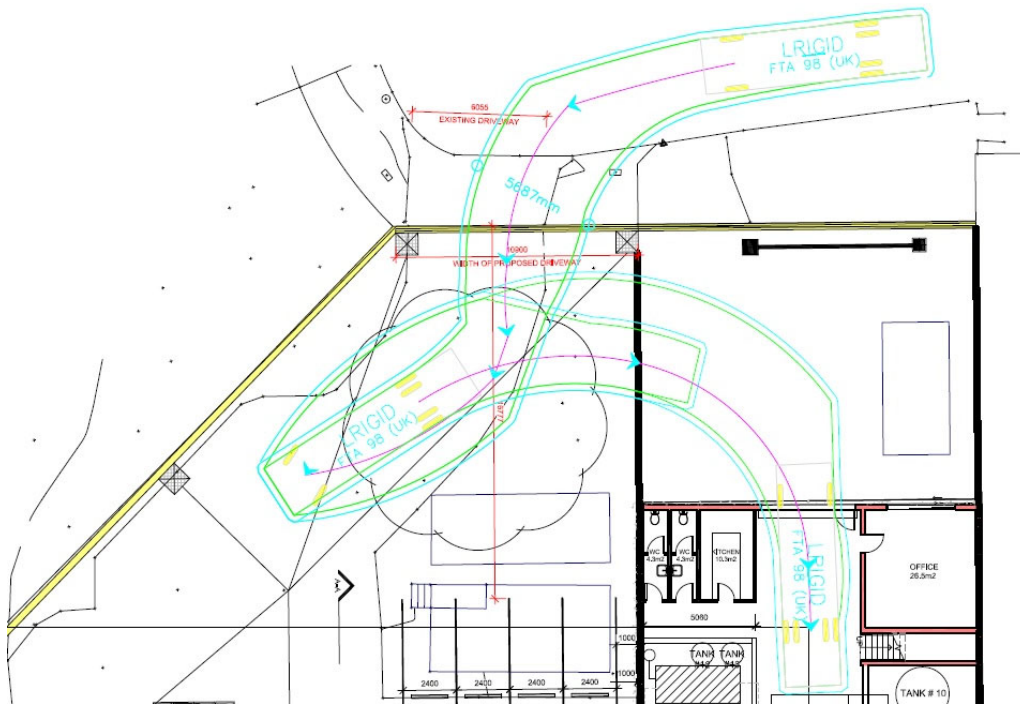




### 2.3.2 Access Arrangements

Vehicular access between the site and Kiora Crescent is provided via the entrance to 16 Kiora Crescent as shown in Figure 2-3. This driveway will provide access to both buildings at 14 and 16 Kiora Crescent. All trucks will leave the site in a forward direction via 14 Kiora Crescent.

Figure 2-3: Access Arrangements



Access arrangements for heavy vehicles to the building at 14 Kiora Cres include entrance via the driveway at No. 16 then reversing into the building at No. 14. Trucks would then leave the site via the driveway at No. 14 in a forward direction.

Trucks accessing the building at No. 16 would use the driveway at the entrance to No. 16 and perform a three point turn before reversing into the truck waiting area. From here the truck can either unload from this location or depending on doorway clearance can drive into the building to unload. Trucks would then leave the site in a forward direction via No. 14.

A series of swept path diagrams are provided in Attachment 1 which clearly demonstrate the site access arrangements for heavy vehicles.

A traffic entrance and egress procedure is provided in Section 3.

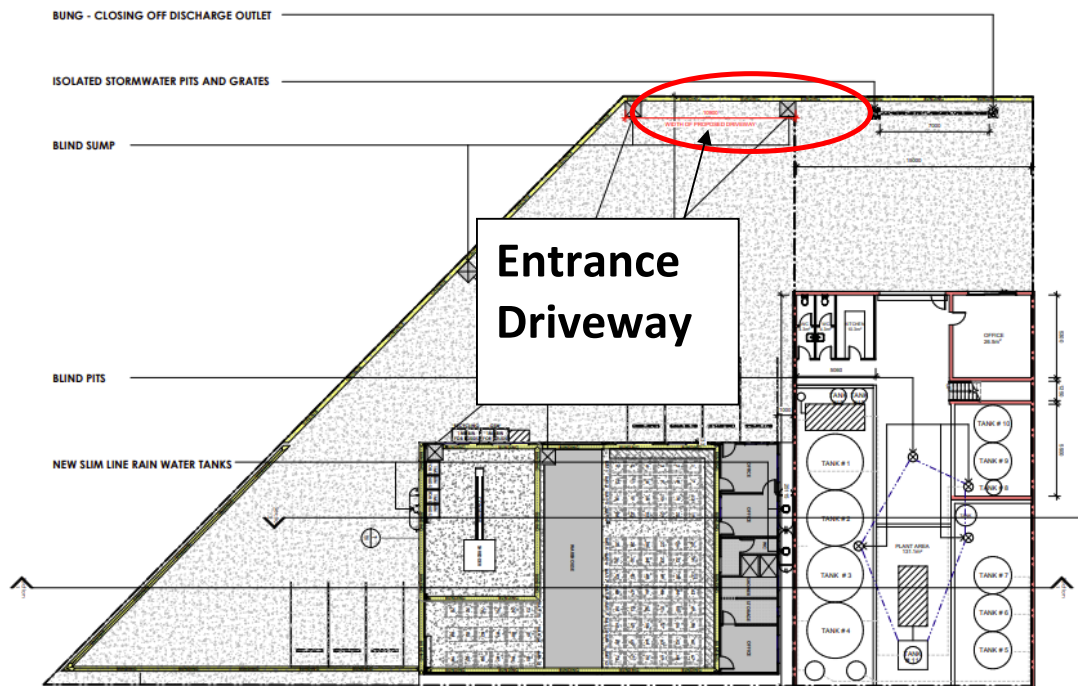


### 3. TRAFFIC ENTRANCE AND EGRESS PROCEDURE

#### 3.1 DRIVEWAY ENTRANCE

All traffic is to enter in a forward direction via the driveway at 16 Kiora Crescent. The site entrance will be clearly sign-posted indicating that this is the only entrance for all vehicles to the site.

Figure 3-1: 16 Kiora Entrance Driveway



#### 3.2 TANKER UNLOADING

After entering 16 Kiora, tankers are to reverse into the building at 14 Kiora in accordance with the swept paths shown in Attachment 1. Drivers must ensure all measures are taken to avoid encroaching on the nature strip. If the building is occupied by another truck, the tanker is to proceed to the truck waiting area in 16 Kiora (see section 3.4).

#### 3.3 TRUCK LOADING

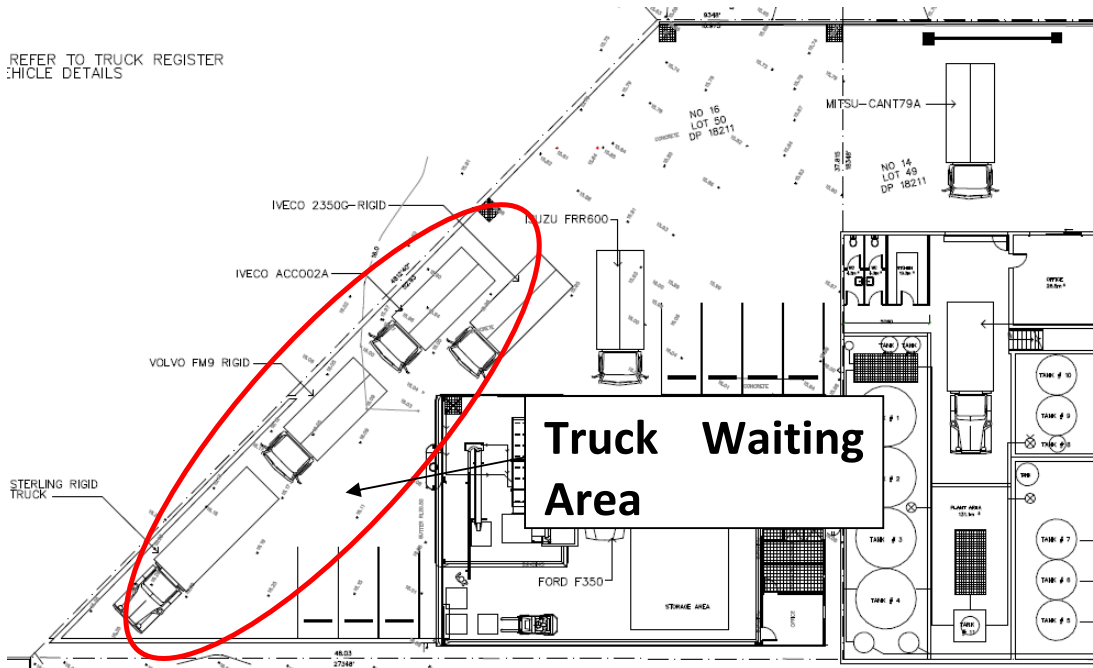
Empty trucks entering the site to pick up liquid waste will enter in a forward direction via 16 Kiora and reverse into the building at 14 Kiora in accordance with the swept paths shown in Attachment 1. Drivers must ensure all measures are taken to avoid encroaching on the nature strip. If the building is occupied by another truck, proceed to the waiting bays at 16 Kiora Crescent await call to arrive by the Traffic Control Officer.

If the loading truck contains waste they are to proceed to the waiting area to await further instructions. (see section 3.4).

### 3.4 TRUCK WAITING/QUEUING

Trucks are not to queue on the street. The on-site truck waiting/ parking area is located at the rear of 16 Kiara Crescent as shown in the figure below. If required, this area is to be used for queuing. There is room for four trucks to queue in this area if needed, however no more than three heavy vehicles are expected to enter and exit the site in an hour.

Figure 3-2: Truck Waiting Area



### 3.5 PALLET TRUCK LOADING/UNLOADING

Pallet trucks delivering or picking up waste are to enter the site in a forward direction via the 16 Kiara driveway as per section 3.1. The pallet truck is to park for loading and unloading where it least obstructs current operations, this may be in the truck waiting area if empty, inside the building depending on the doorway clearance, or in the external area immediately in front of building at 16 Kiara.

### 3.6 TRUCK EGRESS

All trucks shall exit the site via the driveway in a forward direction from 14 Kiara Crescent. This driveway will be clearly sign-posted to indicate that no vehicles shall enter the site from this driveway.

## 4. CODE OF CONDUCT

### 4.1 TRUCK NOISE AND GENERAL CONDUCT

- Truck drivers should be aware of noise impacts on neighbouring receivers and that they adopt the recommended practices to minimise such problems.
- On-site vehicles to be maintained in accordance with a preventative maintenance program to ensure optimum performance and early detection of wearing or noisy components.
- The following practices for on-site vehicle movements should be enforced:
  - ▶ Low on-site speed limits (<10 km/h);
  - ▶ Minimise the use of truck exhaust brakes on site;
  - ▶ Minimising reversing distances and hence noise generated by reversing beepers;
  - ▶ No extended periods of on-site revving/idling.

Any complaints received regarding noise pollution should be handled in accordance with the *Complaints Response Procedure* in the OEMP.

### 4.2 TRUCK DRIVER TRAINING

All Enviro-Waste truck drivers are to undertake Kiora Crescent site-specific Truck Driver Training. This includes performing required tasks safely and competently as well as answering five “true or false” quiz questions correctly.

The following information is to be provided to truck drivers prior to completing the on site training:

- Copy of the swept path diagrams (Attachment 1) showing how trucks are to manoeuvre on site shall be provided to all truck drivers.
- All drivers must follow the directions given by the site’s Traffic Control Officer.
- All trucks accessing the site must not queue on the street.
- Heavy vehicles should use approved offsite parking following approval and when available, in preference to onsite parking
- Truck waiting bays are provided at 16 Kiora Crescent
- All trucks requiring access to the site for loading or unloading must book in the load and access the site at the allocated time as per the truck scheduling procedure.
- All trucks approaching the site must call in over CB radio prior to entering the site.
- All vehicles must enter the site via 16 Kiora Crescent.
- When manoeuvring on site, trucks must take all precautions to avoid encroaching on the nature strip.

### 4.3 QUIZ QUESTIONS AND ANSWERS

Q: Trucks can wait for access to the site anywhere on the street of Kiora Crescent.

A: False

Q: Empty trucks must use the designated waiting bays located at 16 Kiora Crescent

A: True



Q: Trucks can arrive at the site any time of the day without making a booking.

A: False

Q: Up to four trucks can wait in the truck waiting bay at 16 Kiora Crescent whilst the site remains at full operation.

A: True

Q: All truck drivers must follow instructions of the sites Traffic Control Officer.

A: True

The following checklist/form is provided which presents the necessary tasks required to be completed by all truck drivers.



## KIORA CRESCENT TRUCK DRIVER TRAINING

## FORM

This is to certify that \_\_\_\_\_ (name) has completed Kiora Crescent truck driver training and is competent in the following areas:

Training Completed:	(Tick)
• Safely manoeuvre truck into truck waiting area (Swept paths, Attachment 1).	<input type="checkbox"/>
• Safely manoeuvre truck from the waiting area at 16 Kiora into the building at 14 Kiora Crescent.	<input type="checkbox"/>
• Safely proceed to the truck parking area at 16 Kiora Crescent and park truck in allocated bay.	<input type="checkbox"/>
• Driver is able to adequately follow instructions from Traffic Control Officer to proceed from truck parking area to the entrance at 16 Kiora Crescent, truck waiting area and truck loading/unloading area.	<input type="checkbox"/>
• All quiz questions answered correctly.	<input type="checkbox"/>

I verify that I understand the information provided herein as part of the truck driver training and agree to abide by the site's procedures.

Signed: .....

Name: .....

Date: .....

Confirmed by \_\_\_\_\_ (Name of person providing training)

Signed: .....

Date: .....



## 5. TRUCK SCHEDULING PROGRAM

Each vehicle takes approximately 5-20 minutes to unload depending on the quantity of the load.

It is expected that there will generally be 2 or less truck trips per hour, with a maximum of 4 trips per hour.

Truck waiting bays are located at the rear external area at 16 Kiora Crescent, Yennora which provides space for four trucks to park if needed, whilst operations remain at full capacity.

A 24-hour truck schedule is to be managed by admin, the traffic control officer(s) and communicated to the drivers. The truck schedule allows for three truck loads to be processed per hour at maximum. This must account for any incoming or outgoing loads. The schedule is to be made available to regulatory authorities upon request.

Scheduled waste deliveries are to be assigned with an estimated turn around time. Turnaround time includes:

- Time to reach pick up site;
- Time to pick up load; and
- Time to return to home site.

This estimated turnaround time is then used to log an expected return time. The expected return time is scheduled. The following tables are provided as a guide to the schedule procedure. An actual return time is to be recorded to allow for a clear assessment of errors such that adjustments can be made and the scheduling system can be optimised.



Table 5-1: Truck Schedule Form 1

Date	Truck identifier	Pick up destination	Load type	Load quantity	Pick up time	Expected turn around	Scheduled return time	Actual return time



Ref: 191251-04\_OTMPPS\_REV4  
June 2022



Table 5-2: Truck Schedule Form 2

Date	Time of Day	Truck scheduled for site entry
	00:00 AM	1.
	00:20 AM	2.
	00:40 AM	3.
	01:00 AM	1.
	01:20 AM	2.
	01:40 AM	3.
	02:00 AM	1.
	02:20 AM	2.
	02:40 AM	3.
	03:00 AM	1.
	03:20 AM	2.
	03:40 AM	3.
	04:00 AM	1.
	04:20 AM	2.
	04:40 AM	3.
	05:00 AM	1.
	05:20 AM	2.
	05:40 AM	3.
	06:00 AM	1.
	06:20 AM	2.
	06:40 AM	3.
	07:00 AM	1.
	07:20 AM	2.
	07:40 AM	3.
	08:00 AM	1.
	08:20 AM	2.
	08:40 AM	3.



Date	Time of Day	Truck scheduled for site entry
	09:00 AM	1.
	09:20 AM	2.
	09:40 AM	3.
	10:00 AM	1.
	10:20 AM	2.
	10:40 AM	3.
	11:00 AM	1.
	11:20 AM	2.
	11:40 AM	3.
	12:00 PM	1.
	12:20 PM	2.
	12:40 PM	3.
	01:00 PM	1.
	01:20 PM	2.
	01:40 PM	3.
	02:00 PM	1.
	02:20 PM	2.
	02:40 PM	3.
	03:00 PM	1.
	03:20 PM	2.
	03:40 PM	3.
	04:00 PM	1.
	04:20 PM	2.
	04:40 PM	3.
	05:00 PM	1.
	05:20 PM	2.
	05:40 PM	3.
	06:00 PM	1.
	06:20 PM	2.
	06:40 PM	3.



Date	Time of Day	Truck scheduled for site entry
	07:00 PM	1.
	07:20 PM	2.
	07:40 PM	3.
	08:00 PM	1.
	08:20 PM	2.
	08:40 PM	3.
	09:00 PM	1.
	09:20 PM	2.
	09:40 PM	3.
	10:00 PM	1.
	10:20 PM	2.
	10:40 PM	3.
	11:00 PM	1.
	11:20 PM	2.
	11:40 PM	3.
	00:00 AM	1.
	00:20 AM	2.
	00:40 AM	3.



## 6. TRAFFIC CONTROL OFFICER

The traffic control officer responsibilities are provided below:

- A nominated traffic control officer is to be present on site at all times during operation.
- The traffic control officer(s) is/are responsible for implementing the truck scheduling program.
- The traffic control officer(s) is/are responsible for directing vehicles to the waiting area.
- The traffic control officer(s) are to be allocated a working CB radio to undertake communications with truck drivers.
- The traffic control officer(s) is/are to ensure only empty vehicles park at 16 Kiora Crescent.
- The traffic control officer(s) is/are to ensure vehicles follow the procedures presented in the traffic management plan.
- The traffic control officer(s) is/are to ensure all Enviro Waste truck drivers are trained in follow the procedures presented in the traffic management plan.



## 7. PARKING STRATEGY

### 7.1 CAR PARKING

The provision of seven (7) on site car parking spaces will accommodate the expected car requirements for staff. Visitors arriving by car is a rare event as business is generated by staff visiting the customer's premises and discussions over the phone etc. Customers do not visit the liquid processing facility.

### 7.2 TRUCK PARKING

Enviro Waste is committed to the following parking measures:

- Enviro Waste will not park tanker trucks on the street;
- Enviro Waste will only park tanker trucks on-site or on off-site properties approved for tanker parking; and
- Enviro Waste will cease waste collection operations if onsite truck vehicle parking obstructs areas of on-site necessary for vehicles to enter and leave in the forward direction.

Trucks will be parked at 16 Kiora Crescent whilst the site is in operation.

The two sites have the capacity to park the entire fleet (eight vehicles) overnight by sacrificing various levels of operation as follows:

- If eight (8) vehicles need to be parked, all operations cease.
- If six (6) vehicles need to be parked, operations at 16 Kiora must cease.
- If four (4) vehicles need to be parked, normal operations continue.
- It is likely that these restriction conditions would occur occasionally in the night period 10pm-6am.

Overnight parking can be achieved across the two sites as follows:

#### 16 Kiora Crescent:

This site can house a maximum of four (4) trucks without interfering with the site operations, or house six (6) trucks with ceased operations.

- The truck waiting area located along the western boundary can park a maximum of four (4) trucks. Any configuration of 4 trucks from the site can park in this location.  
This parking **does not** interfere with operations.  
In the Interim Overnight Parking Plan (Attachment 2) the trucks shown are: Sterling Rigid truck, Volvo FM9 Rigid, IVECO ACC002A, IVECO 2350G-RIGID.
- The free area in front and inside the building can park a maximum of two (2). These parking locations do not conflict with the swept paths.  
This parking **does** interfere with operations. If used, operations at 16 Kiora will cease.  
In the Interim Overnight Parking Plan the trucks shown are: Ford F350 and ISUZU FRR600



#### 14 Kiora Crescent:

This site can house two (2) trucks with ceased operations.

- The space inside the building and the space in front on the building can park one (1) vehicle each.  
This parking **does** interfere with operations. If used, operations will cease.  
In the Interim Overnight Parking Plan the trucks shows these trucks: Mitsu-CANT79A and Sterling LT7559A

#### **7.2.1 Contingency Plan**

Where eight (8) vehicles need to be parked, operations will cease, and the site will act as a parking location.



## **8. PLAN IMPLEMENTATION AND ADMINISTRATION**

### **8.1 TRAINING**

Training is essential for all truck drivers at the site and a program of training to be undertaken is provided in section 4.2 and 4.3 and records to be kept and maintained.

### **8.2 INCIDENTS AND NON-COMPLIANCES**

All incidents and non-compliances related to vehicle movements and parking are to be dealt with in accordance with the OEMP.

Any changes to parking that affect neighbouring sites must be communicated to them via letter drop and confirmed with council clearly stating the location of the disruption and for how long parking will be disrupted.

### **8.3 COMPLAINTS**

All complaints related to waste are to be dealt with in accordance with the OEMP.

### **8.4 OTMPPS REVIEW**

Throughout operation, certain circumstances may change and as a result, modifications and/or refinements to the WMP may be required to ensure waste management and procedures remain applicable. Review of the OTMPPS is required under conditions C5 of consent SSD-10407 within 3 months of:

- a) The submission of a Compliance Report under Condition C11;
- b) The submission of an incident report under Condition C7;
- c) The submission of an independent environmental audit under Condition C13;
- d) The approval of any modification of the conditions of consent SSD-10407; or
- e) The issue of a direction of the Planning Secretary under Condition A2(b) which requires a review.

The reviews shall be undertaken by the Managing Director and/or delegate such as an external environmental consultant.

Outcomes of the OTMPPS reviews may require modifications to the plan and related documentation. Any revisions would need to be submitted to the Planning Secretary for approval within 6 weeks of the review. Any changes would be communicated to personnel through toolbox talks.

Offsite parking is currently being sought, when this is achieved a review of this plan will be required as this will change procedures.



This concludes the report.

A blue ink signature of Victoria Hale.

Victoria Hale  
Senior Environmental Scientist

A blue ink signature of Emma Hansma.

Emma Hansma  
Senior Engineer

A black ink signature of Kate Barker.

Kate Barker  
Senior Environmental Scientist

A black ink signature of R T Benbow.

R T Benbow  
Principal Consultant



## 9. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

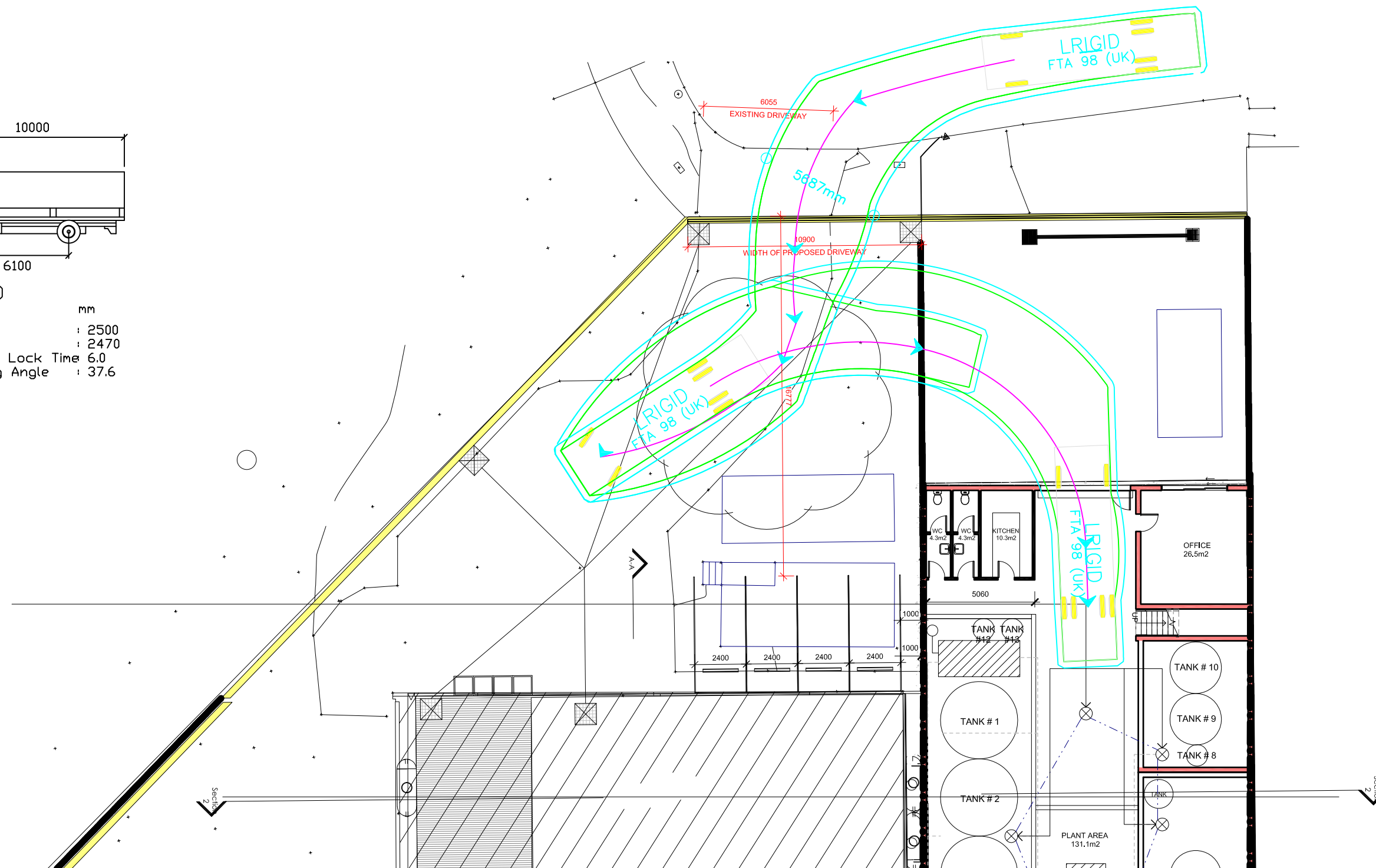
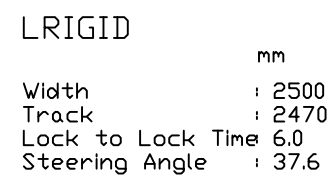
This report has been prepared solely for the use of Enviro Waste Services Group Pty Ltd, as per our agreement for providing environmental services. Only Enviro Waste Services Group Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

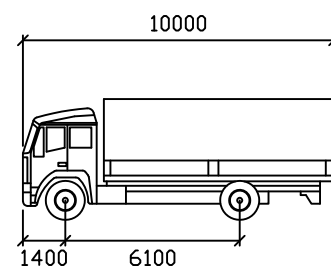
Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by Enviro Waste Services Group Pty Ltd for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

## **ATTACHMENTS**

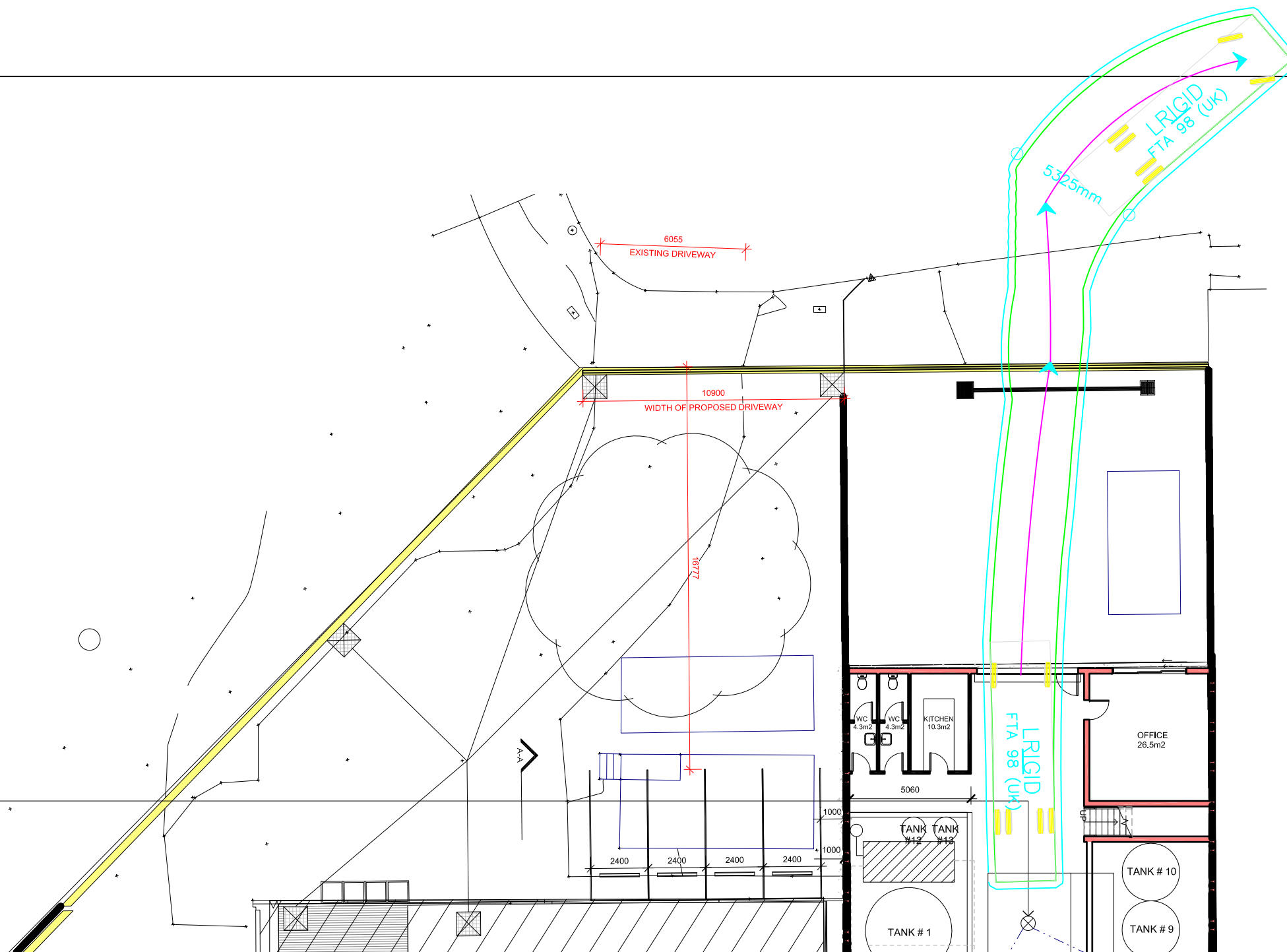






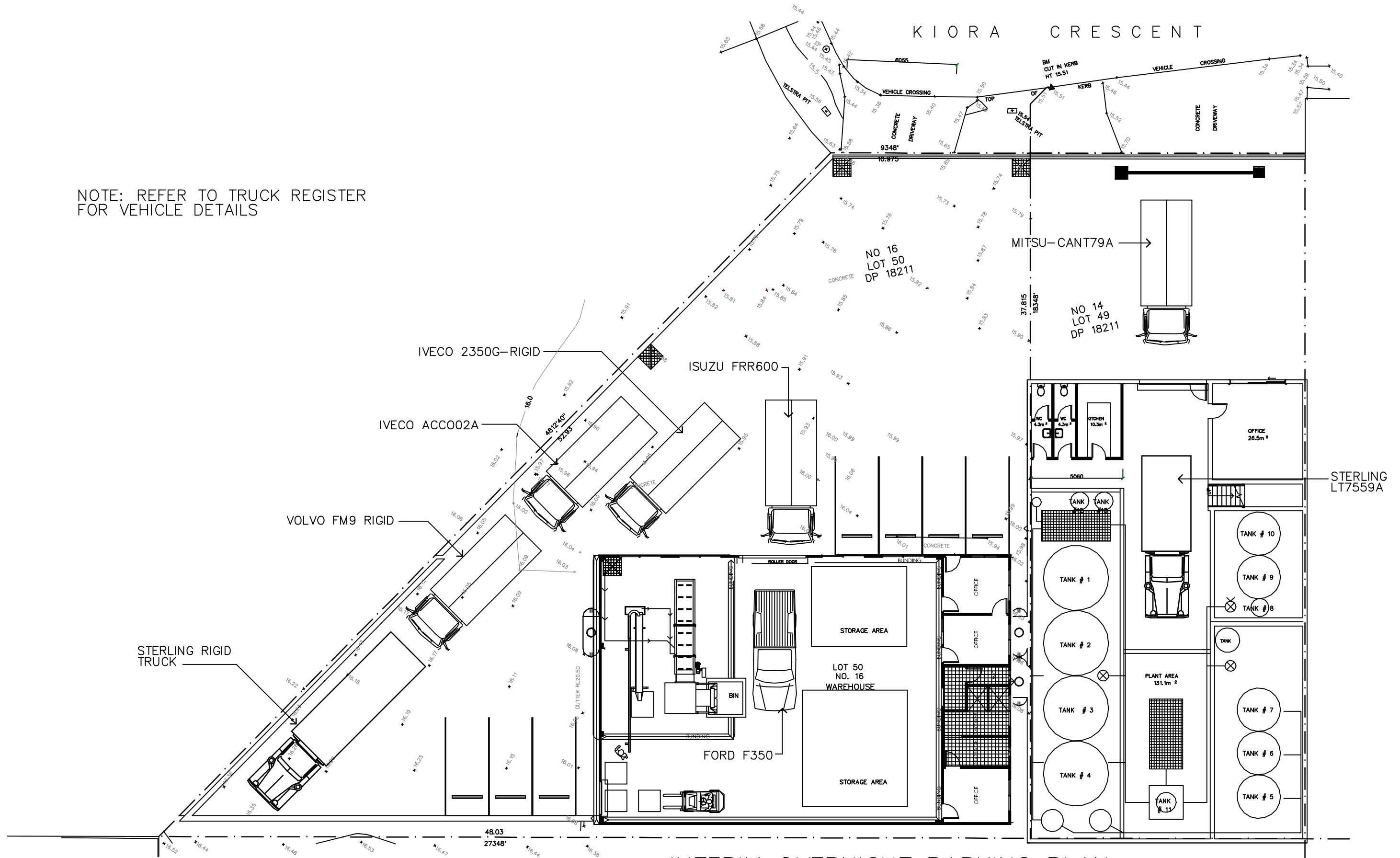
LRIGID

	mm
Width	: 2500
Track	: 2470
Lock to Lock Time	: 6.0
Steering Angle	: 37.6





NOTE: REFER TO TRUCK REGISTER  
FOR VEHICLE DETAILS



INTERIM OVERNIGHT PARKING PLAN  
SCALE 1: 100

ISSUE	BY	DESCRIPTION	DATE
A	GR	ISSUE FOR APPROVAL	1-9-21
B	GR	ISSUE FOR APPROVAL	7-9-21



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PROJECT	ENVIROWASTE SERVICES 14-16 KIORA CRESCENT YENNORA LOT 49 & LOT 50 DP18211	PROJECT NO.	2005
CLIENT	ENVIROWASTE SERVICES GROUP	SCALE	1: 100
TITLE	INTERIM OVERNIGHT PARKING PLAN	JOB NO.	1020/20
		SHEET NO.	PP
		ISSUE	B



Attachment 3: Email Correspondence

---

## Belinda Middleton

---

**From:** Bala Sudarson <Bala.Sudarson@cumberland.nsw.gov.au>  
**Sent:** Tuesday, 1 February 2022 3:38 PM  
**To:** Linda Zanotto  
**Cc:** Kate Barker; Emma Hansma; simon.s@envirowaste.com.au; Eddy Hawach; Nighat Aamir; Soma Somaskanthan  
**Subject:** RE: SSD-10407 - Yennora Liquid Waste Facility – Traffic & Parking Management Plan (Consultation)  
**Attachments:** 191251-04\_OTMPPS\_Rev2.pdf

Hi Linda

In general, I don't have any objection to the attached draft operational management plan.

Regards  
Bala Sudarson



**BALA SUDARSON**  
SENIOR DEVELOPMENT ASSESSMENT ENGINEER

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---

**From:** Linda Zanotto <lzanotto@benbowenviro.com.au>  
**Sent:** Monday, 24 January 2022 1:50 PM  
**To:** Bala Sudarson <Bala.Sudarson@cumberland.nsw.gov.au>  
**Cc:** Kate Barker <kbarker@benbowenviro.com.au>; Emma Hansma <ehansma@benbowenviro.com.au>; simon.s@envirowaste.com.au; Eddy Hawach <eddy.h@envirowaste.com.au>  
**Subject:** SSD-10407 - Yennora Liquid Waste Facility – Traffic & Parking Management Plan (Consultation)

Hi Bala,

Please find attached the draft Operational Traffic Management Plan and Parking Strategy for Envirowaste at 14-16 Kiora Cres, Yennora. We understand that we are required to consult with Council regarding the writing of this plan. Please advise how you wish to proceed.

Feel free to contact me on the number below or reply to this email.

Kind Regards,



**Benbow**  
ENVIRONMENTAL

**Linda Zanotto**  
Senior Environmental Engineer

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**WASTE MANAGEMENT PLAN  
FOR  
ENVIRO WASTE SERVICES GROUP PTY LTD  
14-16 KIORA CRESCENT, YENNORA NSW**

**Prepared for:** Enviro Waste Services Group Pty Ltd

---

**Prepared by:** Victoria Hale, Senior Environmental Scientist  
Linda Zanotto, Senior Environmental Engineer  
R T Benbow, Principal Consultant

---

**Report No:** 191251-04\_WMP\_Rev3  
June 2022  
(Released: 28 June 2022)



**Benbow**  
ENVIRONMENTAL

*Engineering a Sustainable Future for Our Environment*

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## DOCUMENT CONTROL

<b>Title</b>	Waste Management Plan			
<b>Description</b>	A plan to manage waste at the facility as required under Schedule 2, Part B, Conditions B12 and B13 of Project Approval SSD-10407			
<b>Created By</b>	Benbow Environmental			
<b>Date Created</b>	23 December 2021			
<b>Version Number</b>	<b>Modified By</b>	<b>Modifications Made</b>	<b>Date Modified</b>	<b>Status</b>
Revision 1	Benbow Environmental	Issue of draft	23-12-2021	For approval
Revision 2	Benbow Environmental	Updated with new EPL conditions	27-4-2022	For DPIE approval
Revision 3	Benbow Environmental	Update procedures for unexpected machinery breakdown	28-06-2022	For DPIE approval



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## GLOSSARY AND ABBREVIATIONS

AQOMP	Air Quality & Odour Management Plan
AMMAAP	Approved Methods for the Modelling and Assessment of Air Pollutants in NSW
AMSAAP	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW
BCA	Building Code of Australia
BOM	Bureau of Meteorology
Council	Cumberland Council
DPIE	Department of Planning, Industry and Environment
ECO	Emergency Control Organisation
EIS	Environmental Impact Statement
EP	Emergency Plan
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPL	Environment Protection Licence under the POEO Act
FR NSW	Fire and Rescue New South Wales
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.
Industrial liquid waste	Liquid wastes from industrial sources, including Waste Oil (J120), Surfactants (M250), Grease trap waste (K110), Sewage sludge and stormwater (K130), and Landfill leachate (N205), as described in the EIS.
Liquid food waste	Waste consumable liquids such as juices and soft drinks (but not including dairy products), including out-of-date liquids, as described in the EIS
Liquid product waste	Waste liquid products such as shampoos, soaps etc., including out-of-date liquids, as described in the EIS
LWTP	Liquid waste treatment plant
Material harm	Is harm that: <ul style="list-style-type: none"> <li>a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or</li> <li>b) 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)</li> </ul>
N/A	Not applicable
Non-compliance	An occurrence, set of circumstances or development that is a breach of consent SSD-10407.
NSW	New South Wales
OEMP	Operational Environmental Management Plan
OTMP	Operational Traffic Management Plan
OSD	On-site detention
PIRMP	Pollution Incident Response Management Plan
PM <sub>2.5</sub>	Particulate matter of size 2.5 µm
PM <sub>10</sub>	Particulate matter of size 10 µm
POEO Act	Protection of the Environment Operations Act 1997
RNP	NSW EPA Road Noise Policy
SEPP	State Environmental Planning Policy
SWMP	Surface Water Management Plan
TfNSW	Transport for New South Wales
WHS	Work, Health and Safety
WMP	Waste Management Plan



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Appendix 1: Waste Storage Areas





# 1. INTRODUCTION

Benbow Environmental have been commissioned by Enviro Waste Services Group Pty Ltd to prepare a Waste Management Plan (WMP) as required by the Development Consent SSD-10407 from the NSW Government Department of Planning, Industry and Environment for the Yennora Liquid Waste Treatment Plant (SSD-10407) located at 14-16 Kiora Crescent, Yennora.

The report has been prepared by the following suitably qualified Benbow Environmental consultants:

Victoria Hale  
Environmental Scientist  
BSc (Biology) GPA 3.9/4.0, MQ

Linda Zanotto  
Senior Environmental Engineer  
BE (Envi) Hons, UOW  
Member of Engineers Australia

Enviro waste will not commence operation until the WMP is approved by the Planning Secretary and will operate the development in accordance with the approved WMP.

## 1.1 PURPOSE AND OBJECTIVES

The purpose of this plan is to provide an overview of the waste management processes to be undertaken at the premises, and to ensure that these processes are undertaken in accordance with regulatory requirements and in line with industry best practices.

The scope of this WMP is limited to the following objectives:

- Identify reporting and regulatory requirements that must be met in relation to waste management for the site;
- Provide information on the type, quantity and classification of waste to be generated at the site during the construction, demolition and operational phases;
- Describe waste handling and management processes to be undertaken on site, including the processing, disposal and transport of waste; and
- Outline waste management procedures and recommend any additional mitigation measures.

## 1.2 CONSENT CONDITIONS

This WMP has been prepared in accordance with Part B, Conditions B12 and B13 and Part C, Conditions C1, C5 and C6 of Schedule 2 of the Project Approval SSD-10407. These conditions of consent are displayed in the tables below and the section indicated where the condition has been addressed.



Table 1-1: Project Approval SSD-10407 – Schedule 2, Part B, Conditions B12 and B13

Condition	Section of Document Addressing Condition
<p>B12. Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan (WMP) for the development, to the satisfaction of the Planning Secretary. The WMP must form part of the OEMP required by Condition C2 and must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s);</li> <li>(b) include suitable provision to monitor the: <ul style="list-style-type: none"> <li>(i) quantity, type and source of waste received on site; and</li> <li>(ii) quantity, type and quality of the outputs produced on site.</li> </ul> </li> <li>(c) ensure that: <ul style="list-style-type: none"> <li>(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and</li> <li>(ii) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste.</li> </ul> </li> <li>(d) include procedures for ensuring waste would be appropriately managed during unexpected machinery breakdown.</li> </ul>	<p>Section 1</p> <p>5.1</p> <p>5.2</p> <p>5.2.3</p> <p>5.3</p>
<p>B13. The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the WMP is approved by the Planning Secretary; and</li> <li>(b) implement the most recent version of the WMP approved by the Planning Secretary for the duration of the development.</li> </ul>	<p>Section 1</p>



Table 1-2: Project Approval SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
<p>C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> <li>(a) detailed baseline data;</li> <li>(b) details of: <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures and criteria; and</li> <li>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> </li> <li>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>(d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the development; and</li> <li>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</li> </ul> </li> <li>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</li> <li>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</li> <li>(ii) complaint;</li> <li>(iii) failure to comply with statutory requirements; and a protocol for periodic review of the plan.</li> </ul> </li> </ul>	<p>4.2 and 5.8.1</p> <p>3.3</p> <p>2</p> <p>5.2</p> <p>5.8</p> <p>5.2.6</p> <p>5.8.1</p> <p>6.2</p> <p>6.3</p> <p>6.4</p>
<p><b>Note:</b> the Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	
<p>C5. Within three months of:</p> <ul style="list-style-type: none"> <li>(a) the submission of a Compliance Report under Condition C11;</li> <li>(b) the submission of an incident report under Condition C7;</li> <li>(c) the submission of an Independent Audit under Condition C13;</li> <li>(d) the approval of any modification of the conditions of this consent; or the issue of a direction of the Planning Secretary under Condition A2(b) which requires a review,</li> </ul> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing that a review is being carried out.</p>	<p>6.4</p>



Table 1-2: Project Approval SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
C6. If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.	6.4
<b>Note:</b> This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	

## 2. PROJECT INFORMATION

Enviro Waste has approval to process 110,000 tonnes per annum and store a maximum quantity of 477 tonnes on site. The limits of approval are as follows:

- Receipt and processing of no more than 100,000 tonnes of industrial liquid waste per year;
- Receipt and processing of no more than 10,000 tonnes combined of liquid product waste, liquid food waste, shoes, make up or clothes per year;
- Storage of no more than 377 tonnes of liquid waste at any one time (industrial liquid waste and liquid product waste) at the Liquid Waste Treatment Plant (LWTP) at 14 Kiora Crescent;
- Storage of no more than 100 tonnes (combined) of liquid product, liquid food waste, shoes, make up or clothes at any one time at Waste Processing Facility (WPF) at 16 Kiora Crescent; and
- No dairy products, including out-of-date dairy products can be received at the site.

The site activities and site use are described below.

### 2.1.1 14 Kiora Crescent, Yennora

The facility receives liquid wastes including:

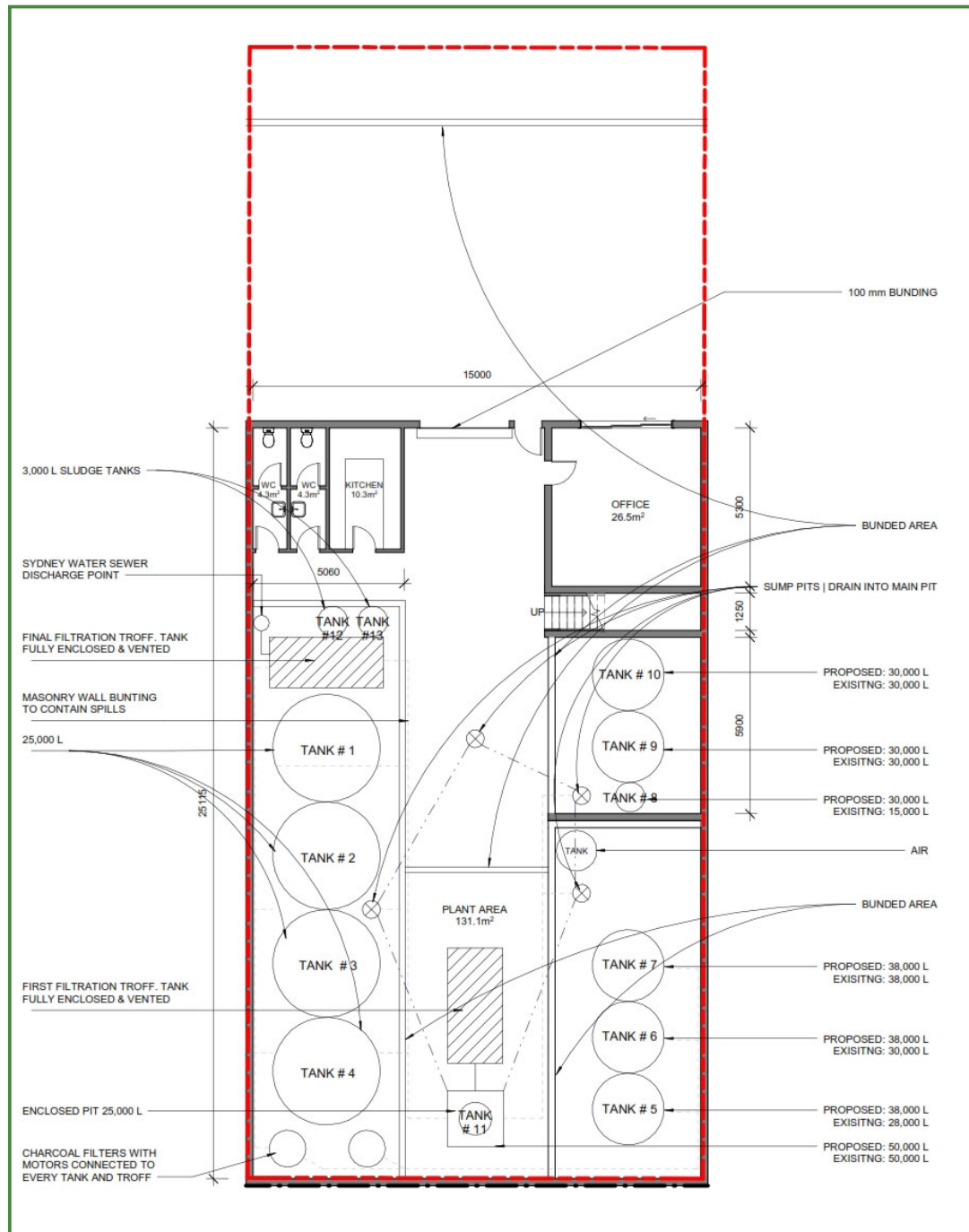
- Residues from industrial waste treatment/disposal operations – landfill leachates (N205);
- Liquid waste material in glass, plastic or aluminium containers;
- Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials (M250);
- Waste oil/hydrocarbons mixtures/emulsions in water (J120);
- Sewage sludge & residues (K130); and
- Grease trap waste (K110).

The operation of the facility involves the following activities:

- Unloading and loading of liquid waste from tanker trucks;
- Filtration of solid debris;
- Separation of solids;
- Separation of oils and sludge; and
- Separation of oil and water.

Figure 2-1 shows the site plan and layout (including tank quantities) at the 14 Kiora Crescent site.

Figure 2-1: Floor plan for 14 Kiora Crescent



### 2.1.2 16 Kiora Crescent, Yennora

The facility at 16 Kiora Crescent receives up to 10,000 tonnes per annum of waste including out-of-date liquid product/food waste for destruction. The total waste storage at any one time is limited to 100 tonnes. Details are provided below.



#### **Incoming waste type (tonnes per annum)**

- Out-of-date liquids (food waste): 6,700
- Shampoo/liquid soaps: 1,600
- Shoes: 200
- Clothes: 250
- Makeup: 1,250
- Total: 10,000**

#### **Outgoing waste type (tonnes per annum)**

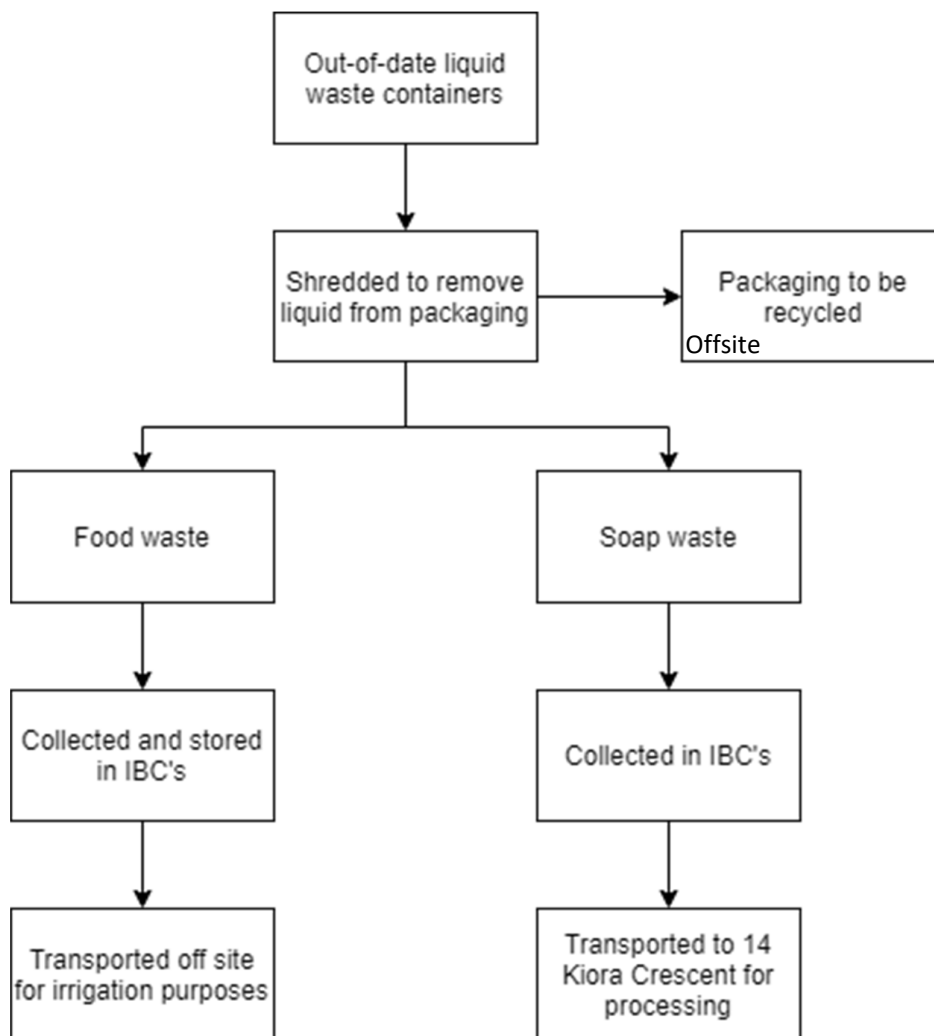
- Plastic: 950
- Cardboard: 950
- Aluminium: 950
- Liquid food waste: 4,600
- Liquid waste (other – for processing at 14 Kiora Crescent): 1,100
- Steel: 450
- Timber: 250
- Glass: 450
- Cloth: 200
- General solid waste: 100
- Total: 10,000**

The destruction and disposal of out-of-date liquid products/food wastes would involve the following:

- Out-of-date, expired or perishable liquid food waste (such as fruit juices, soft drinks, shampoos and soaps) are divided by waste stream (food waste/liquid soaps etc.) and fed into a shredder to separate liquids from packaging.
- Shredded packaging containers (cardboard, plastics, aluminium) are collected and recycled.
- Liquid food wastes are collected into intermediate bulk containers (IBCs) and stored at 16 Kiora Crescent.
- Liquid soap wastes are collected and sent to 14 Kiora Crescent for further processing.
- IBCs containing food waste are transported off site to be used in irrigation practices for agricultural properties/farmlands. The contents of the IBCs would comply with the relevant resource recover exemptions/orders and/or NSW Department of Environment and Conservation “Use of Effluent by Irrigation” (2004) and ANZECC & ARMICANZ “Guidelines for Fresh and Marine Water Quality” Volume 3, Primary Industries — Rationale and Background Information (Irrigation and general water uses, stock drinking water, aquaculture and human consumers of aquatic foods) (2000).

Figure 2-2 shows the process diagram for out-of-date liquid product destruction at 16 Kiora Crescent.

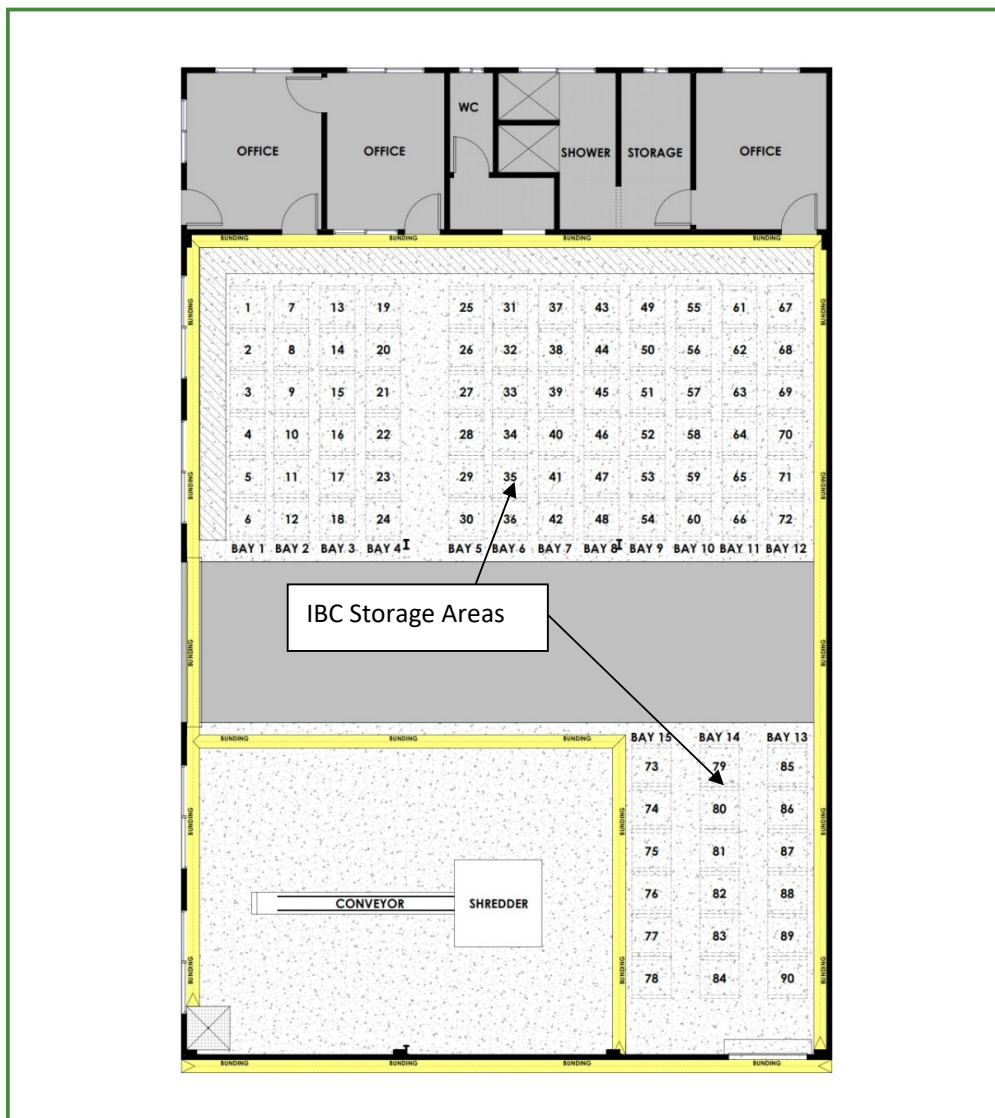
Figure 2-2: Process diagram of liquid product waste destruction



IBCs containing liquids transferred from 16 Kiora Crescent to 14 Kiora Crescent for further processing are delivered via forklift. The transit path is over the hardstand area in front of the buildings. The quantity of waste transferred is a maximum of 1,100 tpa which is an average of 3 IBCs per day.

The floorplan for 16 Kiora Crescent is shown below in Figure 2-3.

Figure 2-3: Proposed floor plan for product destruction processes at 16 Kiara Crescent





### 3. STATUTORY REQUIREMENTS

#### 3.1 RELEVANT LEGISLATION

##### 3.1.1 Protection of the Environment Operations Act 1997

The *Protection of the Environment Operations Act 1997* (POEO Act) is the principal environmental protection legislation for NSW. It defines 'waste' for regulatory purposes and establishes management and licensing requirements for waste. It defines offences relating to waste and sets penalties.

The POEO Act also establishes the ability to set various waste management requirements via the *Protection of the Environment Operations (Waste) Regulation 2014*.

##### 3.1.2 Protection of the Environment Operations (Waste) Regulation 2014

The *Protection of the Environment Operations (Waste) Regulation 2014*, referred to as the 'Waste Regulation', identifies provisions relating to waste management and disposal.

###### 3.1.2.1 Payment of Contributions

Part 2 of the Regulation provides requirements for payment of contributions by scheduled waste facilities. This applies to the facility.

###### 3.1.2.2 Weighbridge Requirement

Part 3 of the Regulation provides requirements for records, measurement of waste and monitoring at scheduled waste facilities. Under Division 2, Clause 36, a weighbridge is required to be installed at facilities required to pay waste contributions under Section 88 of the Act.

An application for a weighbridge exemption was lodged to the NSW EPA for the site at 16 Kiora Crescent based on the limited space available on site. However, a weighbridge is not needed as the quantity of waste to be received at the site is below the scheduled quantity limits for general solid waste listed in Clause 41 and Clause 42 of Schedule 1 of the Act.

###### 3.1.2.3 Waste Tracking

Part 4 of the Regulation details the requirements associated with tracking waste. Certain types of waste (listed in Schedule 1 of this legislation) which have the potential to be harmful to the environment are required to be tracked from the source to the waste disposal facility.

The facility receives and generates waste that:

- Must be tracked when transported within NSW or interstate including:
  - ▶ Waste oil/water, hydrocarbons/water mixtures or emulsions (waste code: J120)
  - ▶ Disposal operations reducing agents (waste code: N205)
  - ▶ Surface active agents (surfactants), containing principally organic constituents and which may contain metals and inorganic materials (waste code: M250)

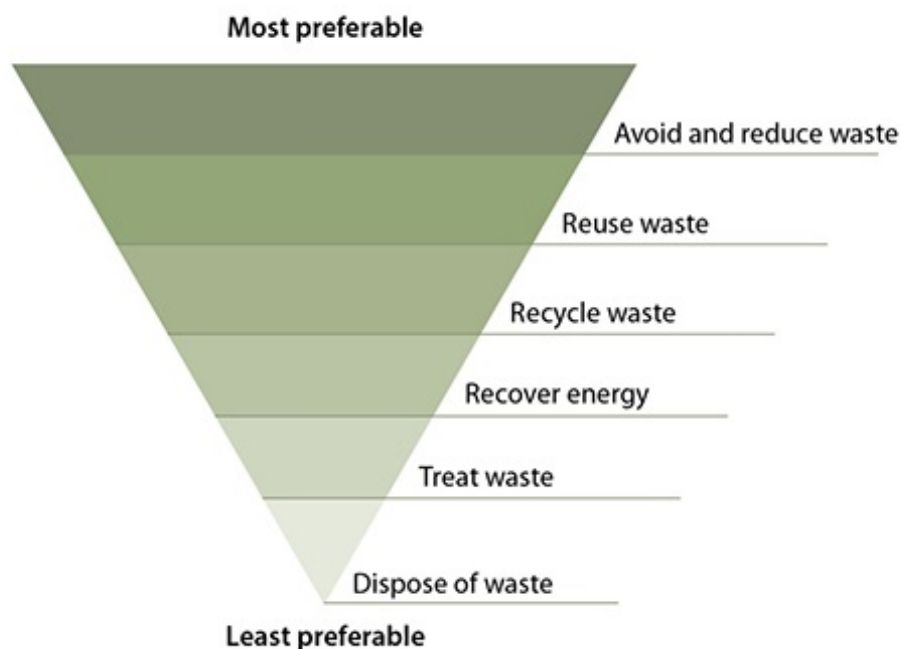
- Must be tracked when transported interstate only:
  - ▶ Grease trap waste (waste code: K110)
- No longer requires tracking because of changes to the POEO (Waste) Regulations:
  - ▶ Sewage sludge and residues including nightsoil and septic tank sludge (K130)

Waste requiring tracking would be undertaken on EPA's online waste tracking system.

### 3.1.3 Waste Avoidance and Resource Recovery Act 2001

The *Waste Avoidance and Resource Recovery Act 2001* (WARR Act) promotes waste avoidance and resource recovery to achieve a continual reduction in waste generation. Among other miscellaneous provisions, the WARR Act sets out provisions for waste strategies and programs, and industry actions for waste reduction.

Waste minimisation and resource recovery is practised as part of Enviro Waste's commitment to the principles of Ecologically Sustainable Development (ESD) and the *Waste Avoidance and Resource Recovery Act 2001*. The company also follows the NSW EPA's hierarchy of waste management, demonstrated in the following diagram:



Waste avoidance and resource recovery practices implemented at the site have been developed in accordance with the primary goal of the *NSW Waste Avoidance and Resource Recovery Strategy 2014-2021*, which is "to enable all of the NSW community to improve environment and community well-being by reducing the environmental impact of waste and using resources more efficiently."

## **3.2 STANDARDS AND GUIDELINES**

### **3.2.1 Waste Classification Guidelines**

All waste materials generated or received on the subject site must be classified into one of six different categories described in the *Waste Classification Guidelines* as follows:

1. Special waste
2. Liquid waste
3. Hazardous waste
4. Restricted solid waste
5. General solid waste (putrescible)
6. General solid waste (non-putrescible)

Waste has been classified as detailed in Section 4 of this WMP.

### **3.2.2 Waste Levy Guidelines**

The *Waste Levy Guideline 2: Records* provides guidance on how an occupier of a facility must record, keep and provide waste records. The facility would adhere to this guideline for records of waste as detailed in the Incoming Waste Procedure.

### **3.2.3 Other Guidelines**

Some wastes are transported off site to be used in irrigation practices for agricultural properties/farmlands. This waste needs to comply with the relevant resource recovery exemptions/orders and/or the following guidelines:

- NSW Department of Environment and Conservation “Use of Effluent by Irrigation” (2004); and
- ANZECC & ARMCANZ “Guidelines for Fresh and Marine Water Quality” Volume 3, Primary Industries — Rationale and Background Information (Irrigation and general water uses, stock drinking water, aquaculture and human consumers of aquatic foods) (2000).

## **3.3 APPROVALS, LICENCES AND LEASES**

### **3.3.1 Development Consent Conditions**

Consent conditions under SSD-10407 specific to the management of waste are provided in the following table.

Table 1-3: Project Approval SSD-10407: Requirements for environmental management

Condition	Requirement	Relevant Section
A6	The Applicant must not: receive or process more than 100,000 tonnes of industrial liquid waste per year; receive or process more than 10,000 tonnes combined of liquid product waste, liquid food waste, shoes, make up or clothes per year; store more than 377 tonnes of liquid waste at any one time (industrial liquid waste and liquid product waste) at the Liquid Waste Treatment Plant (LWTP) at 14 Kiora Crescent; store more than 100 tonnes (combined) of liquid product, liquid food waste, shoes, make up or clothes at any one time at Waste Processing Facility (WPF) at 16 Kiora Crescent; and receive dairy products, including out-of-date dairy products.	2
B7	The Applicant shall not cause, permit or allow any materials or waste (as defined by the POEO Act) generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	3.3.2
B8	All waste processing, and material handling activities must be undertaken in an enclosed processing building and within designated areas.	2
B9	All waste received on site must always be secured and maintained within designated waste storage areas shown in Appendix 1 and must not leave the site onto neighbouring public or private properties.	5.5
B10	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and direct all wastes to a facility or premises that may lawfully accept the waste.	4
B11	The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.	5.2.5

### 3.3.2 EPL Conditions

The EPL conditions specific to waste management are stipulated in the table below.

Table 1-4: EPL requirements

Condition	Requirement	Relevant WMP Section
L3	<b>Volume and mass limits</b>	5.1
L3.1	The quantity of waste stored at the premises must not exceed 477 tonnes at any one time.	
L3.2	The quantity of waste received at 14 Kiora Crescent for storage and/or treatment must not exceed 100,000 tonnes per annum.	
L3.3	The quantity of waste received at 16 Kiora Crescent for storage and/or treatment must not exceed 10,000 tonnes per annum.	



Table 1-4: EPL requirements

Condition	Requirement	Relevant WMP Section																																													
L4	<b>Waste</b>																																														
L4.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence.</p> <table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>Z140</td><td>Non controlled liquids</td><td></td><td>Waste processing (non-thermal treatment)</td><td></td></tr><tr><td>NA</td><td>Liquid Food Waste</td><td></td><td>Waste processing (non-thermal treatment)</td><td></td></tr><tr><td>N205</td><td>Residues from industrial waste treatment/disposal operations</td><td>Landfill leachates.</td><td>Waste processing (non-thermal treatment) Waste storage</td><td>Only leachate from landfills. Excluding landfill leachates contaminated with heavy metals and/or hydrocarbons (aromatic/ aliphatic).</td></tr><tr><td>NA</td><td>Liquid Waste</td><td>Liquid waste material in glass, plastic or aluminium containers.</td><td>Waste processing (non-thermal treatment) Waste storage</td><td>Only off-spec or expired consumer products.</td></tr><tr><td>M250</td><td>Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials.</td><td></td><td>Waste processing (non-thermal treatment) Waste storage</td><td>Excluding surface active agents containing PFAS/PFOA.</td></tr><tr><td>J120</td><td>Waste oil/hydrocarbons mixtures/emulsions in water</td><td></td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr><tr><td>K130</td><td>Sewage sludge &amp; residues</td><td></td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr><tr><td>K110</td><td>Grease trap waste</td><td></td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr></table>	Code	Waste	Description	Activity	Other Limits	Z140	Non controlled liquids		Waste processing (non-thermal treatment)		NA	Liquid Food Waste		Waste processing (non-thermal treatment)		N205	Residues from industrial waste treatment/disposal operations	Landfill leachates.	Waste processing (non-thermal treatment) Waste storage	Only leachate from landfills. Excluding landfill leachates contaminated with heavy metals and/or hydrocarbons (aromatic/ aliphatic).	NA	Liquid Waste	Liquid waste material in glass, plastic or aluminium containers.	Waste processing (non-thermal treatment) Waste storage	Only off-spec or expired consumer products.	M250	Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials.		Waste processing (non-thermal treatment) Waste storage	Excluding surface active agents containing PFAS/PFOA.	J120	Waste oil/hydrocarbons mixtures/emulsions in water		Waste processing (non-thermal treatment) Waste storage		K130	Sewage sludge & residues		Waste processing (non-thermal treatment) Waste storage		K110	Grease trap waste		Waste processing (non-thermal treatment) Waste storage		4.2*
Code	Waste	Description	Activity	Other Limits																																											
Z140	Non controlled liquids		Waste processing (non-thermal treatment)																																												
NA	Liquid Food Waste		Waste processing (non-thermal treatment)																																												
N205	Residues from industrial waste treatment/disposal operations	Landfill leachates.	Waste processing (non-thermal treatment) Waste storage	Only leachate from landfills. Excluding landfill leachates contaminated with heavy metals and/or hydrocarbons (aromatic/ aliphatic).																																											
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J120	Waste oil/hydrocarbons mixtures/emulsions in water		Waste processing (non-thermal treatment) Waste storage																																												
K130	Sewage sludge & residues		Waste processing (non-thermal treatment) Waste storage																																												
K110	Grease trap waste		Waste processing (non-thermal treatment) Waste storage																																												
L4.2	<p><b>Definition of PFAS Contaminated Liquid Waste</b></p> <p>PFAS contaminated liquid waste means a liquid waste that has a concentration of PFOS/PFHxS greater than or equal to 0.7 micrograms/litre or a concentration of PFOA greater than or equal to 5.6 micrograms/litre.</p>	Noted.																																													
L4.3	The licence does not permit the storage or processing of PFAS contaminated liquid waste at the premises.	5.2																																													





Table 1-4: EPL requirements

Condition	Requirement	Relevant WMP Section
O4	<b>Processes and Management</b>	
O4.3	The licensee must ensure that all waste processing is conducted wholly within bunds and in an enclosed building.	5.1.2
O4.4	At all times when wastes are received and/or when the processing plant is operated, the licensee must have suitably qualified and experienced personnel on site who are trained and experienced to perform all the necessary on site monitoring and/or testing of incoming wastes, waste treatment in progress, treated wastes and process plant residues.	5.2.3
O4.6	The facility must not receive out-of-date dairy products.	5.2
O5	<b>Waste Management</b>	
O5.1	The licensee must undertake an initial characterisation of any liquid waste to ascertain the classification of the waste and ensure that it is a waste which it is licensed to receive. This characterisation must be documented and retained by the licensee.	5.2
O5.2	The licensee must ensure that suitable measures (e.g. high/low alarms, control valves with interlock control, one way valves) are installed on all tanks, ponds or clarifiers and associated pipes and hoses to prevent the spillage of waste.	5.1.2
O5.3	Loading, unloading or handling of waste materials, treated or otherwise, must be conducted wholly within bunds and within a building at all times.	5.1.2
O5.4	The licensee must ensure that all waste materials including containers & drums containing waste materials referred to in this licence and containers & drums that are contaminated with residues of a substance or substances referred to in this licence are handled and stored only within the building and within bunded area at all times.	5.5
O5.5	When waste is transported from the premises, the licensee must ensure that the waste is transported:  (a) by a waste transporter authorised to transport such waste; and (b) to a place that can lawfully be used as a waste facility for that waste.	5.4

\* An application for the EPL to be varied has been submitted to include the solid waste types for 16 Kiora Crescent. This variation is still pending.

### 3.3.3 Tradewaste Agreement

The facility operates under a tradewaste agreement and is required to undertake sampling and testing as per the Consent to discharge industrial trade wastewater.



### 3.4 RESOURCE RECOVERY ORDERS & EXEMPTIONS

Relevant resource recovery exemptions and their related orders include:

- The liquid food waste exemption 2014 – applies to liquid food waste that is or is intended to be applied to land as a soil amendment.
- The treated grease trap waste exemption 2014 – applies to treated grease trap waste intended to be applied to land as a soil amendment that has undergone treatment according to the following:
  - ▶ screening to remove physical contaminants;
  - ▶ leaving the grease trap waste to settle by operation of gravity for at least 4 hours, so that the floating fats and oils, the aqueous liquid waste and the settleable portions of the grease trap waste separate; and
  - ▶ the floating layer must either be removed or be incorporated into the bottom settled layer following saponification by the addition of lime.

Where sampling and testing requirements under relevant resource recovery orders are met by Enviro Waste (the supplier), the exemptions allow the waste to be applied to land at the consumer's premises.

## **4. WASTE QUANTITIES & CLASSIFICATION**

This section provided information on the expected quantity and types of waste to be generated or to be received, handled, processed and stored at the subject site, as well as wastes associated with the proposed development to be removed offsite. The main stage of waste generation is ongoing waste.

The following sections list and describe the expected wastes associated with each stage, as well as the waste management proposed. All waste described have been classified in accordance with the NSW EPA *Waste Classification Guidelines* (2014).

The assessment of projected waste volumes is a calculated estimate only and will be influenced by the development's management and occupant's waste disposal and recycling practices.

### **4.1 CONSTRUCTION & DEMOLITION WASTE**

Construction and demolition required is limited to removal the existing demountable, installation of rainwater tanks and minor site changes to allow for the manoeuvring of trucks on site.

This is not likely to result in the generation of significant waste, but some construction waste such as brick, concrete and metal waste may be generated. The expected type, quantity and fate of all construction wastes are outlined in Table 4-1.



Table 4-1: Construction/ Demolition Waste

Waste Type	Estimated Quantity Generated One-off	EPA Waste Classification	Source	Proposed Management
Concrete	<5 m <sup>3</sup>	General solid waste (non-putrescible)	From construction/ demolition works	<u>Recycled offsite</u> Concrete waste will be recycled offsite by a licensed resource recovery facility such as Concrete Recyclers.
Timber	<5 m <sup>3</sup>	General solid waste (non-putrescible)	From construction/ demolition works	<u>Recycled offsite</u> Timber waste will be recycled offsite by a licensed resource recovery facility such as SUEZ.
Metals including aluminium & steel	<5 m <sup>3</sup>	General solid waste (non-putrescible)	From construction/ demolition works	<u>Recycled offsite</u> Metal waste will be recycled offsite by a licensed resource recovery facility such as Sims Metal.
General waste	10 m <sup>3</sup>	General solid waste (non-putrescible)	From construction/ demolition works	<u>Landfill</u> General waste would be sent to a licensed landfill.



## **4.2 ONGOING WASTE**

Types and estimated quantities of waste generated across the whole site are reported below.

Table 4-2: Waste Generation

Waste Type/Source	Code	Classification	Maximum Quantity			Incoming/Outgoing	Management
			Daily	Weekly	Yearly		
<p>Waste Oil</p> <p><b>Source:</b> Industrial oil water separators, car washes, car parks etc.</p>	J120	Liquid waste	400t/day	1500t/wk	30,000 tpa	Incoming	Vacuum tankers pump waste liquid oil through box filters to remove residual fine solids and into a pressurised settling tank (Tank 7). The liquid goes through a second box filter, then into the underground tank (tank 11-east) and is then pumped into settling tanks 5 or 6 where the oil, grease-trap waste\sludge is separated from the wastewater which is transferred to the DAF and discharged as trade waste. The grease-trap waste is pumped to the treated grease trap waste tank (tank 10) and removed offsite as grease trap waste.
<p>Residues from Industrial Waste</p> <p><b>Source:</b> Runoff from tips</p>	N205	Liquid waste	170t/day	600t/wk	12,500 tpa	Incoming	This material goes through a primary filtration box before being pumped in the underground tank (tank 11-west) which is then pumped into settling tanks 1-4 before entering the DAF, being treated with lime if required and sent to trade-waste. Sludge from the DAF is transferred to tanks 12 or 13 to be removed offsite by a licenced contractor.

Table 4-2: Waste Generation

Waste Type/Source	Code	Classification	Maximum Quantity			Incoming/Outgoing	Management
			Daily	Weekly	Yearly		
Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials. <b>Source:</b> Surfactant manufacturing facilities (JALCO etc)	M250	Liquid waste	170t/day	600t/wk	12,500 tpa	Incoming	This material goes through a primary filtration box before being pumped in the underground tank (tank 11-west) which is then pumped into settling tanks 1-4 before entering the DAF, being treated with lime if required and sent to trade-waste. Sludge from the DAF is transferred to tanks 12 or 13 to be removed offsite by a licenced contractor.
Grease trap waste <b>Source:</b> Restaurants, clubs, take away facilities	K110	Liquid waste	200t/day	750t/wk	15,000 tpa	Incoming	Grease trap waste goes through a primary filtration box and treated with lime if required. The waste is transferred to tank 10. This waste is removed via a licenced waste contractor for further processing.
Sewage sludge & residues <b>Source:</b> Domestic septic systems	K130	Liquid waste	400t/day	1500t/wk	30,000 tpa	Incoming	Vacuum tankers pump waste liquid through box filters to remove residual fine solids and into a pressurised settling tank (Tank 7). The liquid goes through a second box filter, then into the underground tank (tank 11-west) which is then pumped into settling tanks 1-4 before entering the DAF, being treated with lime if required and sent to trade-waste. Sludge from the DAF is transferred to tanks 12 or 13 to be removed offsite by a licenced contractor.
Stormwater <b>Source:</b> stormwater pits, drains, sediment ponds etc.	N/A						

Table 4-2: Waste Generation

Waste Type/Source	Code	Classification	Maximum Quantity			Incoming/Outgoing	Management
			Daily	Weekly	Yearly		
Out-of-date liquids (food waste) <b>Source:</b> Supermarkets, manufacturers, retail outlets	-	Liquid waste	100t/day	300t/wk	6,700 tpa	Incoming	The majority of liquids come in pallets of bottles, these bottles are fed onto a conveyor and into a shredder which removes the liquid from the packaging and transfers the liquid into an IBC. Any bottles that are not suitable for shredding will be manually poured out into an IBC and then recycled.
Shampoos/Liquid soaps <b>Source:</b> Supermarkets, manufacturers, retail outlets	-	Liquid waste	20t/day	100t/wk	1,600 tpa	Incoming	The majority of liquids come in pallets of bottles, these bottles are fed onto a conveyor and into a shredder which remove the liquid from the packaging and transfers the liquid into an IBC. Any bottles that are not suitable for shredding will be manually poured out into an IBC.
Clothes and Shoes <b>Source:</b> Supermarkets, manufacturers, retail outlets	-	General solid waste (putrescible)	5t/day	25t/wk	450 tpa	Incoming	This waste is manually sorted by staff and sent for further recycling.
Makeup <b>Source:</b> Supermarkets, manufacturers, retail outlets	-	General solid waste (putrescible)	20t/day	60t/wk	1,250 tpa	Incoming	These containers are fed onto a conveyor and into a shredder which remove the liquid from the packaging and transfers the liquid into an IBC. Any containers that are not suitable for shredding will be manually poured out into an IBC.
Wastewater	NA	Liquid waste	1,200t/day	4,000t/wk	80,000 kL/yr	Outgoing	Treated wastewater is discharged to sewer in accordance with trade waste agreement.



Table 4-2: Waste Generation

Waste Type/Source	Code	Classification	Maximum Quantity			Incoming/Outgoing	Management
			Daily	Weekly	Yearly		
Waste Oil Residue/Sludge	K110	Liquid waste	300t/day	1,000t/wk	20,000 kL/yr	Outgoing	Oil and sludge is transferred from the filters/DAF to a waste storage tank. This waste is removed from site by a licenced waste contractor to be processed as grease trap waste. Waste oil sludge (K110) is tested and if waste meets the requirements of the RRO/RRE applied to land via injection typically at the Envirohills farm located at 670 Tiycas Lane Boxers Creek. If it does not meet the requirements of the RRO/RRE the waste is picked up by licensed waste contractor (typically AP bins or Sydney Waste Services).
Sewage Sludge	K130	Liquid waste	42kL/day	150kL/wk	3,000 kL/year	Outgoing	Sewage sludge wastes is removed by a licensed waste contractor, (typically AP bins or Sydney Waste Services). The licensed waste contractor would test and classify the waste. In the event the sewage sludge complies with the biosolids order and exemption the licensed waste contractor would find a site suitable for the application to land for the classification.
Oily solids from filters	NA	General solid waste (putrescible)	1kL/day	2kL/wk	50kL/yr	Outgoing	Disposed to landfill through general waste disposal (240 L bins). Serviced weekly by AP bins or Sydney Waste Services.
Sewage/stormwater solids from filters	NA	General solid waste (putrescible)	1kL/day	2kL/wk	50kL/yr	Outgoing	Disposed to landfill through general waste disposal (240 L bins). Serviced weekly typically by AP bins or Sydney Waste Services.

Table 4-2: Waste Generation

Waste Type/Source	Code	Classification	Maximum Quantity			Incoming/Outgoing	Management
			Daily	Weekly	Yearly		
General office waste	NA	General solid waste (non-putrescible)	<1t/day	<1t/wk	2 tpa	Outgoing	Recycled/disposed using regular 240 L domestic bins. Serviced weekly
Plastic	NA	General solid waste (non-putrescible)	10t/day	50t/wk	950 tpa	Outgoing	Recycled offsite (eg. Visy)
Cardboard	NA	General solid waste (non-putrescible)	10t/day	50t/wk	950 tpa	Outgoing	Recycled offsite (eg. Visy)
Aluminium	NA	General solid waste (non-putrescible)	10t/day	50t/wk	950 tpa	Outgoing	Recycled offsite (eg. Sims Metal Management)
Liquid food waste: including soft drink, energy drinks, alcoholic beverages, juices and similar types of products	NA	Liquid waste	80t/day	250t/wk	4,600 tpa	Outgoing	IBCs containing food waste are transported off site to be used in irrigation practices for agricultural properties/farmlands. The contents of the IBCs would comply with the relevant resource recover exemptions/orders and/or NSW Department of Environment and Conservation "Use of Effluent by Irrigation" (2004) and ANZECC & ARMCANZ "Guidelines for Fresh and Marine Water Quality" Volume 3, Primary Industries — Rationale and Background Information (Irrigation and general water uses, stock drinking water, aquaculture and human consumers of aquatic foods) (2000).



Table 4-2: Waste Generation

Waste Type/Source	Code	Classification	Maximum Quantity			Incoming/Outgoing	Management
			Daily	Weekly	Yearly		
Liquid waste (other – for processing at 14 Kiora Crescent)	NA	Liquid waste	15t/day	50t/wk	1,100 tpa	Onsite	IBC transferred to building at 14 Kiora Crescent then pumped into settling tanks 1-4 before entering the DAF, being treated with lime if required and sent to trade-waste. Sludge from the DAF is transferred to tanks 12 or 13 to be removed offsite by a licenced contractor.
Steel	NA	General solid waste (non-putrescible)	5t/day	25t/wk	450 tpa	Outgoing	Recycled offsite (eg. sims metal)
Timber	NA	General solid waste (non-putrescible)	3t/day	12t/wk	250 tpa	Outgoing	Recycled offsite
Glass	NA	General solid waste (non-putrescible)	5t/day	25t/wk	450 tpa	Outgoing	Recycled offsite
Cloth	NA	General solid waste (non-putrescible)	3t/day	10t/wk	200 tpa	Outgoing	Recycled offsite
General solid waste		General solid waste (non-putrescible)	1t/day	5t/wk	100 tpa	Outgoing	This is stored inside the building located at 16 Kiora Crescent. Where material cannot be recycled it is disposed of at a licenced waste facility.

## 5. WASTE PROCEDURES AND PROGRAMS

### 5.1 WASTE MONITORING AND MEASUREMENT

Quantities of liquids received at 14 Kiora Crescent are measured as using scales underneath the pressurised tanks (#5-7). The other non-pressurised tanks which receive liquids (#1-4 and #8-10) have flow meters on the inlet which measure volume of liquid received.

Quantities of waste received at 16 Kiora Crescent are measured before and after receipt at a public weighbridge, typically 14 Sammut Street Smithfield. Vehicles requiring a public weighbridge receipt, which do not use the public weighbridge will be rejected and materials will not be unloaded. This would be managed using the incoming waste procedure.

All waste loads would be recorded in accordance with the *Waste Levy Guideline 2: Records* as detailed in the Incoming Waste Procedure.

#### 5.1.1 Incoming Waste

Quality control for incoming waste includes:

- Control of the wastes accepted into the facility, as described in the incoming waste procedure in Section 5.
- Ensuring the appropriate paperwork is obtained at the receipt of the liquid waste. Suppliers of waste would be from authorised reputable companies whose details would be recorded with all incoming loads.
- Regular maintenance of the dewatering equipment as per manufacturer's specifications.

#### 5.1.2 Waste Processing

Enviro Waste would undertake waste processing at their plant in accordance with the following:

- All loading, unloading or handling of waste materials is conducted wholly within bunds and within the buildings on site at all times.
- Conduct all waste processing activities within the enclosed buildings on site.
- Ensure suitable measures such as high/low alarms, control valves with interlock control and one way valves where appropriate are installed on all tanks and associated equipment to prevent the spillage of waste.

#### 5.1.3 Recovered Waste

Where resource recovery orders and exemptions apply, the waste would need to comply with the conditions of relevant orders (The liquid food waste exemption 2014 and the treated grease trap waste exemption 2014) to be re-used off site for application to land as a soil amendment.

"Processor responsibilities" under the orders apply to the facility and where applicable, the following quality control measures would be put in place:

- A written sampling plan would be prepared including:
  - ▶ A description of sample preparation;
  - ▶ Storage procedures for samples;
  - ▶ Sampling method;
  - ▶ Testing for list of chemicals and attributes as per column 1 of table 1 of the relevant order;
  - ▶ Validation of test results with values listed in the relevant order; and
  - ▶ Record keeping procedures.
- Contaminant testing would be undertaken at a NATA certified laboratory.
- Record keeping of all test results.
- Preparation of a written statement of compliance certifying that the waste complies with the conditions of the relevant order. This would be supplied to consumers of the material along with copies of test results, a copy of the relevant order and exemption.
- Written records detailing the supply of the material would be maintained for at least six years and would need to include:
  - ▶ Quantity of material supplied;
  - ▶ Name and address of each person (and location) to whom the material was supplied;
  - ▶ Name of the transporter and vehicle registration number; and
  - ▶ Date of transportation.

## 5.2 INCOMING WASTE PROCEDURE

### 5.2.1 Purpose

The purpose of this procedure is to facilitate the process of dealing with unauthorised or non-conforming waste brought onto the site. The procedure will enable confirmation of the identity of waste types within incoming tankers and loads brought onto site and deal with any unexpected or non-conforming wastes such as asbestos.

### 5.2.2 Definitions

For the purposes of the procedure, the following definitions of relevance:

#### **Contaminated Material**

*Materials that contain substances that are of sufficient concentration to potentially cause harm to human health or the environment. (EPA Act)*

#### **Acceptable wastes**

Acceptable wastes include:

- Residues from industrial waste treatment/disposal operations – landfill leachates (N205)
- Liquid waste material in glass, plastic or aluminium containers
- Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials (M250)
- Waste oil/hydrocarbons mixtures/emulsions in water (J120)
- Sewage sludge & residues (K130)
- Grease trap waste (K110)
- Out-of-date liquids (soft drink, energy drinks, alcoholic beverages, juices and similar types of products)
- Shampoo/liquid soaps
- Shoes



- Clothes
- Makeup

#### **Not accepted / Non-conforming wastes**

Not accepted at the site are any waste not listed above (non-conforming wastes) such as:

- Out-of-date dairy products;
- PFAS contaminated liquid waste;
- Liquid food waste with offensive odours;
- ENM and VENM or any fill material;
- Hazardous materials;
- Chemicals of any description;
- Asbestos;
- Fibro;
- Putrescible materials;
- Spent gas bottles;
- Fibreglass;
- Garden waste or vegetation;
- Batteries;
- Paint; and
- Any of the above mixed with accepted waste types.

#### **Consignment authorisation (CA)**

An approval issued by a waste receiving facility to a consignor for the movement of a specific type of waste to the nominated receiving facility for up to one year.

The CA must specify:

- The consignor of the waste
- The facility lawfully receiving the waste
- The waste code
- The period of validity of the CA

A CA must be created before waste can be transported from the producer to a receiving facility.

#### **Transport certificate (TC)**

TCs are created from the CA to accompany each waste movement. This may be a single waste movement or multiple waste movements within the CA's validity period. A TC can be used to record a waste movement.

### **5.2.3 Training Requirements**

Personnel responsible for accepting incoming waste at the facility and those personnel supervising the processing of waste must be trained in the following:

- Relevant requirements of the POEO Act including the waste regulation
- Waste Tracking Requirements and Waste Codes
- Requirements of any waste conditions in the facility's EPL
- Hazardous material, prohibited waste and how to handle these
- Requirements of this incoming waste procedure

Other relevant environmental awareness training and details regarding maintenance of training records are included in the site's OEMP.

#### 5.2.4 Waste Records

The site must comply with the Waste Levy Guidelines 2018 requirements for recording and reporting of trackable liquid waste as follows:

*Scheduled waste facilities receiving trackable liquid waste must also maintain original records of the information required under Part 3 of the Waste Regulation for:*

- *trackable liquid waste and other material received at the facility*
- *trackable liquid waste and other material stored at the facility*
- *trackable liquid waste transported from the facility*
- *waste and material other than trackable liquid waste transported from the facility*

For each load of waste received and sent out of the facility, the transporter, receiver or generator must make a record of the following:

- Name and address of the transporter;
- Registration number of the vehicle used to transport the waste;
- Type and quantity of the waste transported, including trackable waste;
- Date on which the waste is delivered to the receiver;
- Name and address of the receiver; and
- Date on which the record was made.

This can be undertaken using Cas and TCs on the EPAs online waste tracking system.

Enviro Waste must retain the copy of the record referred to above for a period of not less than six years after the time the record was made and, on request, must make a copy of the record available for inspection by an authorised officer.

Records for incoming and outgoing waste can be recorded in a spread sheet like the following below.



#### INCOMING WASTE RECORD – EXAMPLE ONLY

SITE: Enviro Waste 14-16 Kiora Crescent, Yennora

EPL No. 20444

Date	Time	Vehicle Registration No.	Vehicle Type	Received from (Customer Details)			Waste Stream	Waste Type	Quantity Received		Storage Tank / Bin I.D.	Weighbridge Reference No.
				Name	Address	EPL No. (if applicable)			Volume (m <sup>3</sup> )	Total tonnes		

#### OUTGOING WASTE RECORD – EXAMPLE ONLY

SITE: Enviro Waste 14-16 Kiora Crescent, Yennora

EPL No. 20444

Date	Time	Vehicle Registration No.	Vehicle Type	Sent to (Facility Details)			Waste Stream	Waste Type	Quantity Delivered		Weighbridge Reference No.
				Name	Address	EPL No. (if applicable)			Volume (m <sup>3</sup> )	Total tonnes	

Note: The above tables can be set up in a spreadsheet format with drop down menus to select the vehicle type and waste type, autofill cells for conversion factors and/or the total tonnes calculated using a set formula.





### **5.2.5 Procedure**

1. Incoming load is booked in via Enviro Waste's truck scheduling program
2. Driver obtains TC or relevant documentation (eg: test results) for waste load and checks all relevant information is included. Note: This includes waste classification of any liquid waste. If waste classification records are not available, initial characterisation of the waste to ascertain the classification under the Waste Classification Guidelines may be required.
3. Driver uses CB radio to advise of approach and follows instructions provided by Traffic Control Officer. Traffic Control Officer advises whether the load is to be weighed on site or at a public weighbridge.
4. If load requires weighing at the public weighbridge, driver proceeds to 14 Sammut Street, Smithfield and obtains weighbridge receipt prior to entering the Enviro Waste site via 16 Kiora Crescent, Yennora.
5. If load can be weighed on site, driver proceeds to the site and enters via 16 Kiora Crescent, Yennora.
6. Upon receipt of load, documentation is checked and recorded and truck is directed to appropriate location for unloading. Note: Testing of all bulk liquid waste prior to collection is required. Any loads that have not been tested are considered non-conforming waste.
7. If all relevant documentation is not provided or if load is found to be unacceptable or to contain non-conforming waste, it is rejected and directed to immediately leave the property. Conforming loads are accepted and all bulk liquid waste loads are tested after receipt.
8. All non-conforming waste loads are recorded in a reject loads register that is maintained at the site.
9. All sampling and waste classification data shall be maintained for the life of the development in accordance with the requirements of EPA.

### **5.2.6 Contingency Plan**

In the unlikely event that non-conforming waste enters the facility, any existing wastes incidentally contaminated by the non-conforming waste will also be removed offsite to a facility licenced to accept that waste type. Sampling and analysis would be undertaken where necessary. All equipment will be decontaminated where required, any contaminated wash water would be disposed of at a facility licenced to receive that waste type.

### **5.2.7 Reject Loads Register**

Any non-conforming waste must be recorded in the rejected loads register and include the following details:



1. Date and time the load was rejected
2. Vehicle registration number including any trailers transporting the rejected load of waste both to and from the facility
3. The type of waste(s) in the rejected load of waste
4. The reason the load was rejected.

#### **5.2.8 Non-conforming waste**

Operator owned and trained vacuum truck drivers and the incoming waste procedure prevent non-conforming liquid wastes from entering the site. This includes recording of all loads in a register that is maintained on site. The register includes non-conforming loads that are rejected.

All bulk liquid waste is tested prior to collection and then again after receipt. All non-conforming waste will be rejected and sent back to the generation site or to a facility licenced to receive that waste. It is extremely unusual to receive non-conforming waste on-site.

In the unlikely event that non-conforming waste enters the facility, any existing wastes incidentally contaminated by the non-conforming waste will also be removed offsite to a facility licenced to accept that waste type. Sampling and analysis would be undertaken where necessary. All equipment will be decontaminated where required, any contaminated wash water would be disposed of at a facility licenced to receive that waste type.

The facility rarely accepts waste that is transported from vehicles outside its own fleet. This is enforced by clearly specifying employee responsibilities with the potential consequence of termination of the employment contract if staff does not meet their obligations.

Documentation for any sampling, testing and alternate disposal of the waste would also be maintained.

### **5.3 UNEXPECTED MACHINERY BREAKDOWN PROCEDURE**

#### **5.3.1 Purpose**

The purpose of this procedure is to provide guidance on how waste would be managed on site during unexpected machinery breakdown.

#### **5.3.2 Definitions**

For the purposes of the procedure, the following definitions of relevance:

##### **Unexpected Machinery Breakdown**

Sudden and unforeseen breakdown of machinery which may require repairs or replacement.

#### **5.3.3 Machinery List**

Location: 14 Kiora Cres

- Pump;
- Air Compressor;
- Filtration machinery:
  - ▶ Primary Filtration Box



- ▶ Secondary Filtration Bin
- ▶ DAF Filter (liquid)
- ▶ Biofilters (air)

Location: 16 Kiora Cres

- Shredder; and
- Conveyor.

#### **5.3.4 Procedure**

##### General

- All machinery is to be maintained in accordance with manufacturer's specifications. Proper regular maintenance will minimise breakdown frequency.
- The following instructions shall be followed in the event of specific machinery breakdown.

##### Pump/Air Compressor Breakdown

- Back up pumps & air compressors shall be kept and maintained at the premises.
- In the event of an unexpected pump or air compressor breakdown, the machinery can be immediately replaced with a back up while the faulty machinery is being repaired.
- During replacement work, all waste operations shall be stopped until the machinery is replaced.
- No tanker loads are to be accepted. Any tankers arriving during this time shall park in designated bays and await instructions to proceed for unloading.
- Tankers that are scheduled to arrive shall be turned away and sent back to their place of origin until such time as the plant can commence accepting waste.

##### Filtration machinery breakdown (14 Kiora Cres)

Note: Filtration machinery is located at 14 Kiora Cres and includes primary and secondary filtration box/bin, DAF Unit and the Biofilter.

- In the event of an unexpected filtration machinery, all waste processing operations will cease. Emergency shut-down buttons will be activated.
- Waste within tanks would remain stored and be isolated if necessary.
- Should liquid waste need to be removed from filtration machinery whilst repairs are being undertaken, this would be pumped into tankers that would park in designated bays on site until repairs are complete and machinery is cleared to commence operating.
- During repair work, all waste operations shall be stopped until the machinery is repaired.
- No tanker loads are to be accepted. Any tankers arriving during this time shall park in designated bays and await instructions to proceed for unloading.
- Tankers that are scheduled to arrive shall be turned away and sent back to their place of origin until such time as the plant can commence accepting waste.
- No waste shall be transferred from 16 Kiora Cres.
- Processing shall not restart until machinery has been cleared to recommence operation by the repairer.

##### Shredder/conveyor breakdown (16 Kiora Cres)

- In the event of an unexpected shredder or conveyor breakdown, all waste processing operations will cease.
- Waste within IBCs and would remain stored and be isolated if necessary.
- Should liquid waste need to be removed from machinery whilst repairs are being undertaken, this would be transferred into IBCs and stored within designated areas.

- During repair work, all waste operations shall be stopped until the machinery is repaired.
- No waste loads are to be accepted. Any loads arriving during this time shall park in designated bays and await instructions to proceed for unloading.
- Loads that are scheduled to arrive shall be turned away and sent back to their place of origin until such time as the plant can commence accepting waste.
- Processing shall not restart until machinery has been cleared to recommence operation by the repairer.

## 5.4 TRANSPORT OF WASTE

The transport of the waste is required to be undertaken by licensed waste transporters if the waste is trackable waste. Enviro Waste would ensure the waste is transported by a transporter licensed to transport such waste and to a waste facility that can lawfully accept such waste. Records of waste leaving the site would include details of the transporter and facility at which the waste is sent (Section 5.2.4). Furthermore, the following would be undertaken:

- Waste is to be transported in a manner that avoids the waste spilling, leaking or otherwise escaping;
- Waste is to be covered during transport;
- Transport vehicles used are to be constructed and maintained to avoid waste spilling leaking or otherwise escaping from the vehicle;
- Any material that has been segregated for recycling must not be mixed with other waste during transportation; and
- Transport of waste must abide by the proximity principle which restricts the transport of waste by road more than 150 km from its origin.

Waste types to be transported from the site would consist solely of a single listed waste type or waste that meets the requirements of a resource recovery exemption or the recovered fines specification.

## 5.5 WASTE STORAGE

Waste storage locations for the site is presented in the following table and shown in Appendix 1.

Table 5-1: Site Waste Storage

Tank ID	L/Kg	Waste Type(s)
Tank 1	25,000	Wastewater from Waste oil/hydrocarbons mixtures/emulsions in water (J120); Sewage sludge & residues (K130); Residues from industrial waste treatment/disposal operations – landfill leachates (N205); Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials (M250);
Tank 2	25,000	Sewage sludge & residues (K130);
Tank 3	25,000	

Table 5-1: Site Waste Storage

Tank ID	L/Kg	Waste Type(s)
Tank 4	25,000	Residues from industrial waste treatment/disposal operations – landfill leachates (N205); Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials (M250);
Tank 5	38,000	Waste oil/hydrocarbons mixtures/emulsions in water (J120);
Tank 6	38,000	
Tank 7	38,000	Waste oil/hydrocarbons mixtures/emulsions in water (J120); Sewage sludge & residues (K130);
Tank 8	30,000	Sludge from Waste oil/hydrocarbons mixtures/emulsions in water (J120);
Tank 9	30,000	
Tank 10	30,000	Treated grease trap waste (K110)
Tank 11*	50,000	West Containment (25,000L): Sewage sludge & residues (K130); Residues from industrial waste treatment/disposal operations – landfill leachates (N205); Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials (M250);  East Containment (25,000L): Waste oil/hydrocarbons mixtures/emulsions in water (J120);
Tank 12	3,000	Sludge from DAF from Tank 1
Tank 13	3,000	
IBC Storage	100,000	Out-of-date liquids (food waste); Shampoos/Liquid soaps; Clothes and Shoes;
Bins	8,000	Solid waste (8 x 1m <sup>3</sup> bins)
Various	9,000	Waste within DAF, box filters etc.
<b>TOTAL STORAGE</b>	<b>477,000</b>	

The storage of waste on site would comply with the following:

- All waste received on site must always be secured and maintained within designated waste storage areas shown in Appendix 1 and must not leave the site onto neighbouring public or private properties.
- Waste receptacles and the waste storage area must be inspected on a weekly basis to ensure that storage is appropriate, with no leakage, spills, items or litter from receptacles or storage bays;
- Four (4) 240 L bins will be required. Two (2) for general waste and two (2) for recycling, these will be split between 14 and 16 Kiora Crescent.
- All waste materials including containers and drums referred to in the EPL would be handled and stored only within the building and within bunded areas at all times.
- Waste collection of general waste will be undertaken weekly.



## 5.6 SIGNAGE AND EDUCATION

Signage and education are critical in ensuring the waste and recycling systems at the proposed development are operating effectively. Effective signage and education are vital in informing cleaners, tenants, contractors and other users of the facility about the importance of recycling and to provide clear instruction regarding the proper use of recycling and waste services provided on the premises.

The NSW EPA has developed a set of standard signs and labels available for a wide variety of uses and can be found at: <https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/business-government-recycling/standard-recycling-signs>.

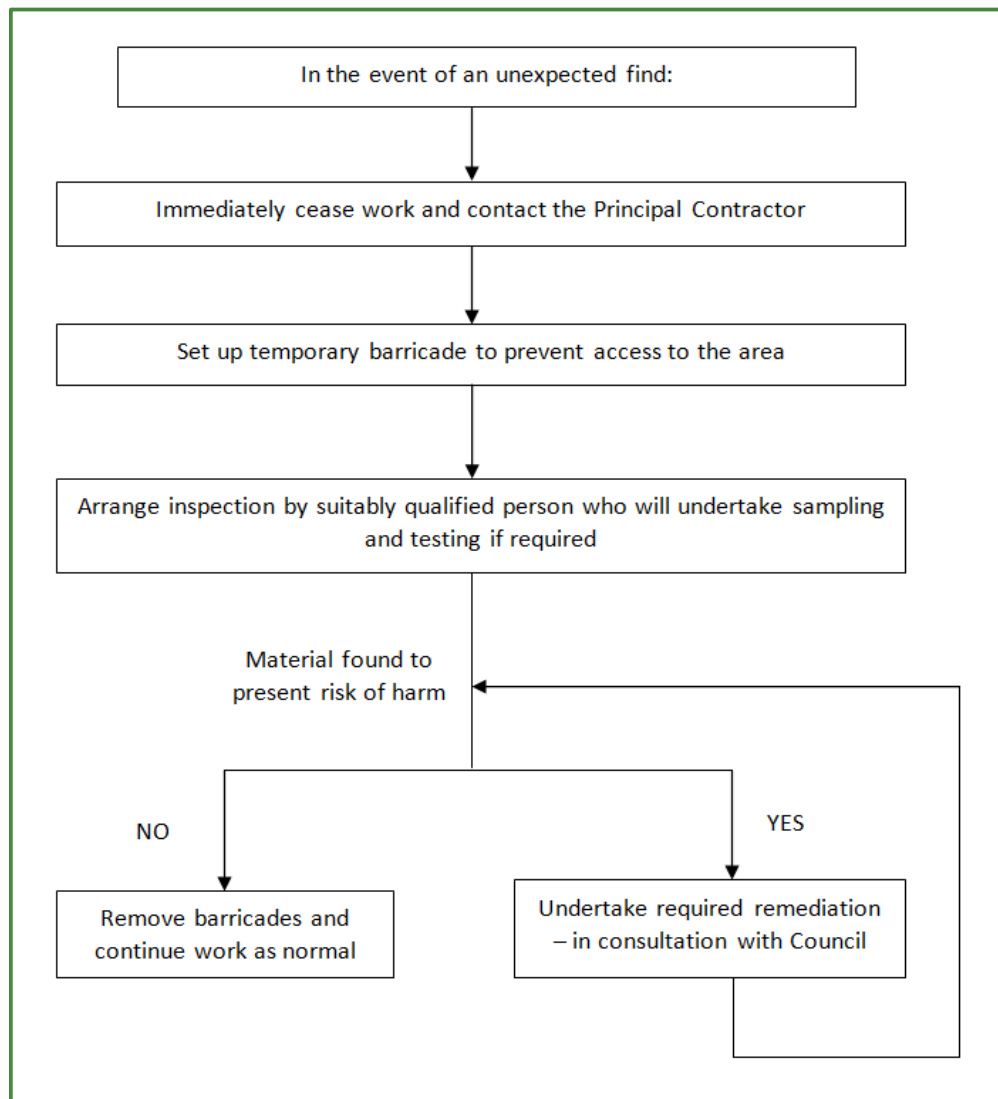
All signage used should conform to the relevant Australian Standard and the NSW EPA standard recycling signs, and the following is recommended:

- All waste receptacles should be clearly and correctly labelled at all times;
- Waste storage areas should have clear signage instructing cleaners and tenants on the proper use of equipment and facilities;
- Waste storage areas should have clear signage instructing cleaners and contractors how to correctly separate general and recycling waste materials;
- The location of, and direction to, waste storage areas and relevant important equipment, including the most direct routes for cleaners and tenants; and
- Emergency contact information should be displayed in the event that issues arise concerning the waste or recycling system/services operating on the premises.

## 5.7 UNEXPECTED FINDS PROTOCOL

If suspect material, such as asbestos, is encountered unexpectedly at any stage during the demolition or construction works, the works being undertaken must cease immediately as precautionary measure to ensure the protection of site workers, contractors and the occupants of nearby premises. The flowchart provided in Figure 5-1 can then be used as a general guide for response to the unexpected find.

Figure 5-1: Unexpected Finds Protocol Flowchart



## 5.8 WASTE MINIMISATION PROGRAM

It is recommended that a waste minimisation program be implemented to achieve more efficient usage of resources and high recycling and re-use rates. Waste audits would provide detailed information to enable identification of potential opportunities to minimise waste.

### 5.8.1 Waste Audit

A waste audit could be undertaken annually. Initially, the waste audit would determine the existing waste generation including waste types and quantities. This would provide baseline data for the facility. Based on the waste audits, Site Management would be able to identify opportunities for savings, set goals and implement any specific waste minimisation initiatives as well as ensuring that the integrity of the waste system is still sound and appropriate. This Waste Management Plan should also be reviewed annually and updated when necessary.



The waste audit would:

- Confirm waste types, storage location and quantities at each waste storage area;
- Review of waste monitoring records (quantities of incoming and outgoing waste) against requirements under the consent SSD-10407 and the EPL;
- Provide a breakdown of wastes stored at the site;
- Provide a breakdown of wastes received and sent out of the site;
- Identify areas of improvement to waste management practices and potential resource recovery opportunities.

It is recommended the first waste audit be undertaken by an independent environmental consultant following the first year of operation.





## 6. PLAN IMPLEMENTATION AND ADMINISTRATION

### 6.1 TRAINING

Training in waste management is essential for all staff working at the site and a program of training to be undertaken and records to be maintained is provided in the OEMP.

Specific training for waste management is detailed in Section 5.2.3.

### 6.2 INCIDENTS AND NON-COMPLIANCES

All incidents and non-compliances related to waste are to be dealt with in accordance with the OEMP.

### 6.3 COMPLAINTS

All complaints related to waste are to be dealt with in accordance with the OEMP.

### 6.4 WMP REVIEW

Throughout operation, certain circumstances may change and as a result, modifications and/or refinements to the WMP may be required to ensure waste management and procedures remain applicable. Review of the WMP is required under conditions C5 of consent SSD-10407 within 3 months of:

- a) The submission of a Compliance Report under Condition C11;
- b) The submission of an incident report under Condition C7;
- c) The submission of an independent environmental audit under Condition C13;
- d) The approval of any modification of the conditions of consent SSD-10407; or
- e) The issue of a direction of the Planning Secretary under Condition A2(b) which requires a review.

The reviews shall be undertaken by the Managing Director and/or delegate such as an external environmental consultant.

Outcomes of the WMP reviews may require modifications to the plan and related documentation. Any revisions would need to be submitted to the Planning Secretary for approval within 6 weeks of the review. Any changes would be communicated to personnel through toolbox talks.

This concludes the report.

Victoria Hale  
Senior Environmental Scientist

Linda Zanotto  
Senior Environmental  
Engineer

R T Benbow  
Principal Consultant



## 7. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of Enviro Waste Services Group Pty Ltd, as per our agreement for providing environmental services. Only Enviro Waste Services Group Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by Enviro Waste Services Group Pty Ltd for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

## **APPENDICES**

## Appendix 1: Waste Storage Areas

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## APPENDIX 1 DEVELOPMENT LAYOUT PLANS

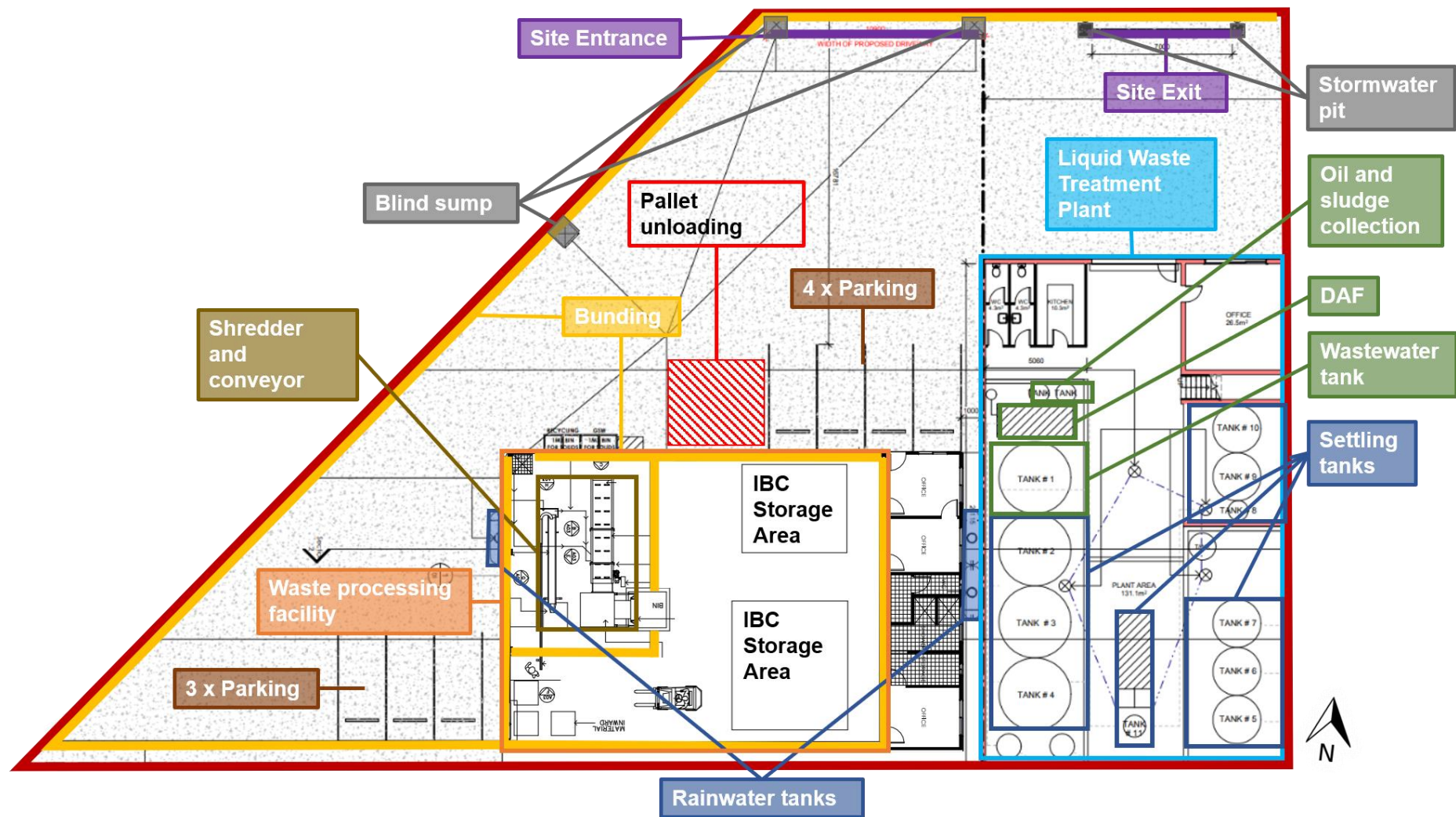


Figure 1: Site Plan



**SURFACE WATER MANAGEMENT PLAN  
FOR  
ENVIRO WASTE SERVICES GROUP PTY LTD  
14-16 KIORA CRESCENT, YENNORA NSW**

**Prepared for:** Enviro Waste Services Group Pty Ltd

---

**Prepared by:** Linda Zanotto, Senior Environmental Engineer  
Victoria Hale, Senior Environmental Scientist  
Damien Thomas, Environmental Scientist  
R T Benbow, Principal Consultant

---

**Report No:** 191251-04\_SWMP\_Rev3  
June 2022  
(Released: 28 June 2022)



**Benbow**  
ENVIRONMENTAL

*Engineering a Sustainable Future for Our Environment*

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## DOCUMENT CONTROL

# Surface Water Management Plan

[illegible]

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ENVIRONMENTAL

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## GLOSSARY AND ABBREVIATIONS

AQOMP	Air Quality & Odour Management Plan
AMMAAP	Approved Methods for the Modelling and Assessment of Air Pollutants in NSW
AMSAAP	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW
BCA	Building Code of Australia
BOM	Bureau of Meteorology
Council	Cumberland Council
DPIE	Department of Planning, Industry and Environment
ECO	Emergency Control Organisation
EIS	Environmental Impact Statement
EP	Emergency Plan
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPL	Environment Protection Licence under the POEO Act
FR NSW	Fire and Rescue New South Wales
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.
Industrial liquid waste	Liquid wastes from industrial sources, including Waste Oil (J120), Surfactants (M250), Grease trap waste (K110), Sewage sludge and stormwater (K130), and Landfill leachate (N205), as described in the EIS.
Liquid food waste	Waste consumable liquids such as juices and soft drinks (but not including dairy products), including out-of-date liquids, as described in the EIS
Liquid product waste	Waste liquid products such as shampoos, soaps etc., including out-of-date liquids, as described in the EIS
LWTP	Liquid waste treatment plant
Material harm	Is harm that: <ul style="list-style-type: none"> <li>a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or</li> <li>b) 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)</li> </ul>
N/A	Not applicable
Non-compliance	An occurrence, set of circumstances or development that is a breach of consent SSD-10407.
NSW	New South Wales
OEMP	Operational Environmental Management Plan
OTMPPS	Operational Traffic Management Plan and Parking Strategy
OSD	On-site detention
PIRMP	Pollution Incident Response Management Plan
PM <sub>2.5</sub>	Particulate matter of size 2.5 µm
PM <sub>10</sub>	Particulate matter of size 10 µm
POEO Act	Protection of the Environment Operations Act 1997
RNP	NSW EPA Road Noise Policy
SEPP	State Environmental Planning Policy
SWMP	Surface Water Management Plan
TfNSW	Transport for New South Wales
WHS	Work, Health and Safety
WMP	Waste Management Plan

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- Attachment 2: Surface Water Baseline Data and Monitoring Records
- Attachment 3: Stormwater Sampling – 2020 Baseline Data Results
- Attachment 4: Consent to discharge Industrial Trade Wastewater
- Attachment 5: Consent to discharge Industrial Trade Wastewater Application Form



# 1. INTRODUCTION

Benbow Environmental has been engaged by Enviro Waste Services Group Pty Ltd to prepare a Surface Water Management Plan (SWMP) to address the Consent Conditions from the NSW Government Department of Planning, Industry and Environment for the Yennora Liquid Waste Treatment Plant (SSD-10407) located at 14-16 Kiora Crescent, Yennora.

The report has been prepared by the following suitably qualified Benbow Environmental consultants:

Damien Thomas  
Environmental Scientist  
BEnv MQU  
Member of ALGA

Victoria Hale  
Environmental Scientist  
BSc (Biology) GPA 3.9/4.0, MQU

Linda Zanotto  
Senior Environmental Engineer  
BE (Envi) Hons, UOW  
Member of Engineers Australia

Enviro Waste will not commence operation until the SWMP is approved by the Planning Secretary and will operate the development in accordance with the approved SWMP.

## 1.1 PURPOSE AND OBJECTIVES

The purpose of this plan is to detail water usage, wastewater management and the management and monitoring of surface waters, and to ensure that site processes are undertaken in accordance with regulatory requirements and in line with industry best practices.

The scope of this SWMP is limited to the following objectives:

- Review reporting and regulatory requirements that must be met in relation to stormwater and wastewater management for the proposed development;
- detail the management of wastewater streams on-site;
- include suitable provision to monitor the surface water impact assessment criteria, including trigger levels for investigating and potential adverse surface water impacts;
- include spill management procedures; and
- provide a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.

## 1.2 CONSENT CONDITIONS

This SWMP has been prepared in accordance with Part B, Conditions B16 and B17 and Part C, Conditions C1, C5 and C6 of Schedule 2 of the Development Consent SSD-10407. These conditions of consent are displayed in the tables below and the section indicated where the condition has been addressed.

Table 1-1: Project Approval SSD-10407 – Schedule 2, Part B, Conditions B16 and B17

Condition	Section of Document Addressing Condition
<p>B16. Prior to the commencement of operation, the Applicant must prepare a Surface Water Management Plan (SWMP) to the satisfaction of the Planning Secretary. The SWMP must form part of the OEMP required by Condition C2 and must:</p> <ul style="list-style-type: none"> <li>(a) detail water use, metering, disposal and management on-site;</li> <li>(b) detail the management of wastewater streams on-site;</li> <li>(c) include suitable provision to monitor the surface water impact assessment criteria, including trigger levels for investigating and potential adverse surface water impacts;</li> <li>(d) include spill management procedures; and</li> <li>(e) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.</li> </ul>	<p>4, 2.2</p> <p>2.1</p> <p>5.1</p> <p>5.2</p> <p>5.1.6</p>
<p>B17. The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the SWMP required by Condition B16 is approved by the Planning Secretary; and</li> <li>(b) implement the most recent version of the SWMP approved by the Planning Secretary for the duration of the development.</li> </ul>	Section 1

Table 1-2: Project Approval SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
<p>C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> <li>(a) detailed baseline data;</li> <li>(b) details of: <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures and criteria; and</li> <li>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> </li> <li>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>(d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the development; and</li> <li>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</li> </ul> </li> <li>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</li> <li>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</li> <li>(ii) complaint;</li> <li>(iii) failure to comply with statutory requirements; and a protocol for periodic review of the plan.</li> </ul> </li> </ul>	<p>5.1.2</p> <p>3</p> <p>5.1.1</p> <p>5.1.1.1</p> <p>5 and 2.2.3</p> <p>5.1 and 5.1.5</p> <p>5.3</p> <p>6.2</p> <p>6.3</p> <p>6.4</p>
<p><b>Note:</b> the Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	
<p>C5. Within three months of:</p> <ul style="list-style-type: none"> <li>(a) the submission of a Compliance Report under Condition C11;</li> <li>(b) the submission of an incident report under Condition C7;</li> <li>(c) the submission of an Independent Audit under Condition C13;</li> <li>(d) the approval of any modification of the conditions of this consent; or the issue of a direction of the Planning Secretary under Condition A2(b) which requires a review,</li> </ul> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing that a review is being carried out.</p>	6.4



Table 1-2: Project Approval SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
C6. If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.	6.4
<b>Note:</b> This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	



## 2. PROJECT INFORMATION

### 2.1 WASTE & WASTEWATER PROCESSES

Enviro Waste has approval to process 110,000 tonnes per annum and store a maximum quantity of 477 tonnes on site. The limits of approval are as follows:

- Receipt and processing of no more than 100,000 tonnes of industrial liquid waste per year;
- Receipt and processing of no more than 10,000 tonnes combined of liquid product waste, liquid food waste, shoes, make up or clothes per year;
- Storage of no more than 377 tonnes of liquid waste at any one time (industrial liquid waste and liquid product waste) at the Liquid Waste Treatment Plant (LWTP) at 14 Kiora Crescent;
- Storage of no more than 100 tonnes (combined) of liquid product, liquid food waste, shoes, make up or clothes at any one time at Waste Processing Facility (WPF) at 16 Kiora Crescent; and
- No dairy products, including out-of-date dairy products can be received at the site.

The site activities and site use are described below.

#### 2.1.1 14 Kiora Crescent, Yennora

The facility receives liquid wastes including:

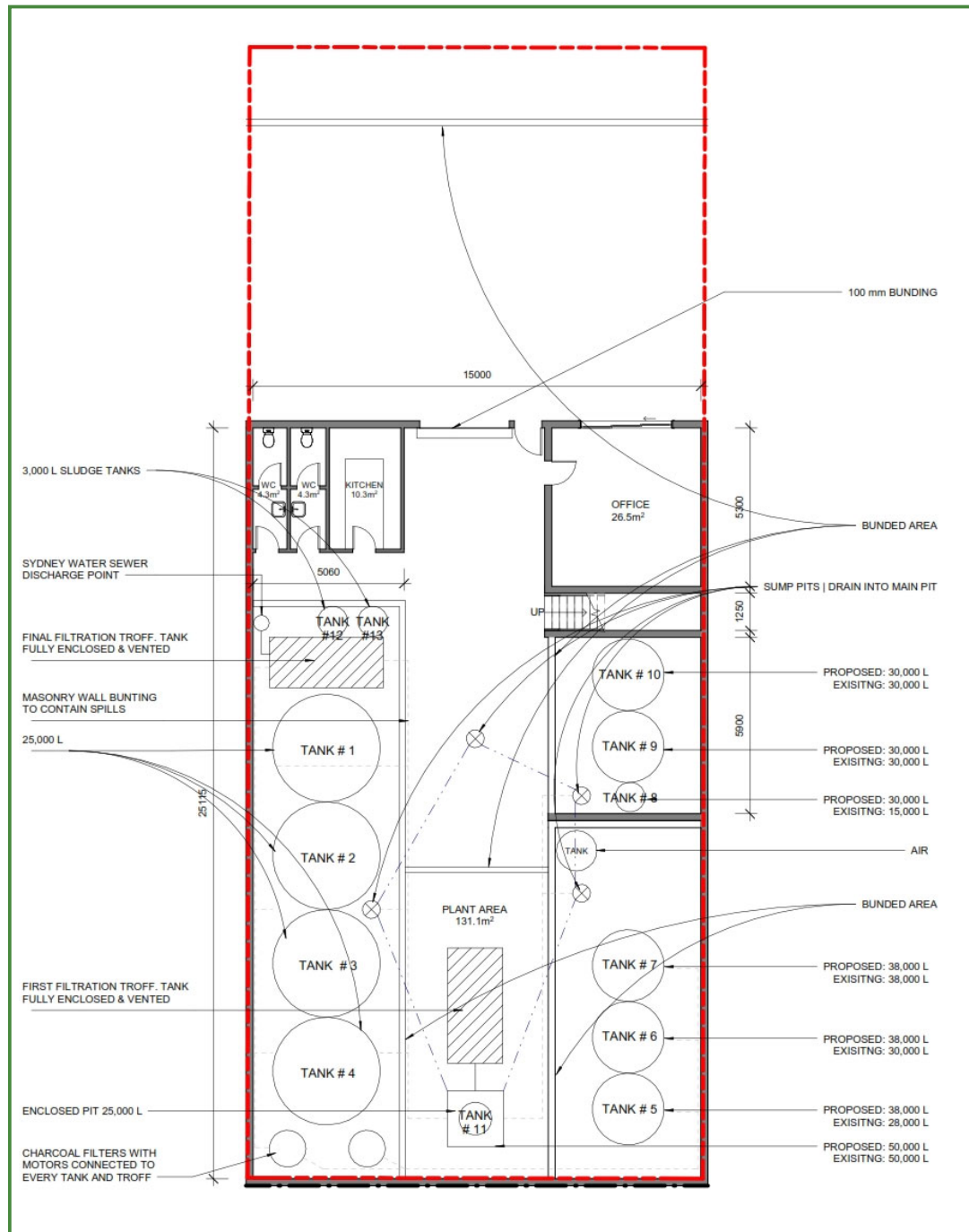
- Residues from industrial waste treatment/disposal operations – landfill leachates (N205);
- Liquid waste material in glass, plastic or aluminium containers;
- Surface active agents (surfactants) containing principally organic constituents, and which may contain metals and inorganic materials (M250);
- Waste oil/hydrocarbons mixtures/emulsions in water (J120);
- Sewage sludge & residues (K130); and
- Grease trap waste (K110).

The operation of the facility involves the following activities:

- Unloading and loading of liquid waste from tanker trucks;
- Filtration of solid debris;
- Separation of solids;
- Separation of oils and sludge; and
- Separation of oil and water.

Figure 2-1 shows the site plan and layout (including tank quantities) at the 14 Kiora Crescent site.

Figure 2-1: Floor plan for 14 Kiora Crescent



### 2.1.2 16 Kiora Crescent, Yennora

The facility at 16 Kiora Crescent receives up to 10,000 tonnes per annum of waste including out-of-date liquid product/food waste for destruction. The total waste storage at any one time is limited to 100 tonnes. Details are provided below.

#### Incoming waste type (tonnes per annum)

- Out-of-date liquids (food waste): 6,700
- Shampoo/liquid soaps: 1,600
- Shoes: 200
- Clothes: 250
- Makeup: 1,250
- Total: 10,000**

#### Outgoing waste type (tonnes per annum)

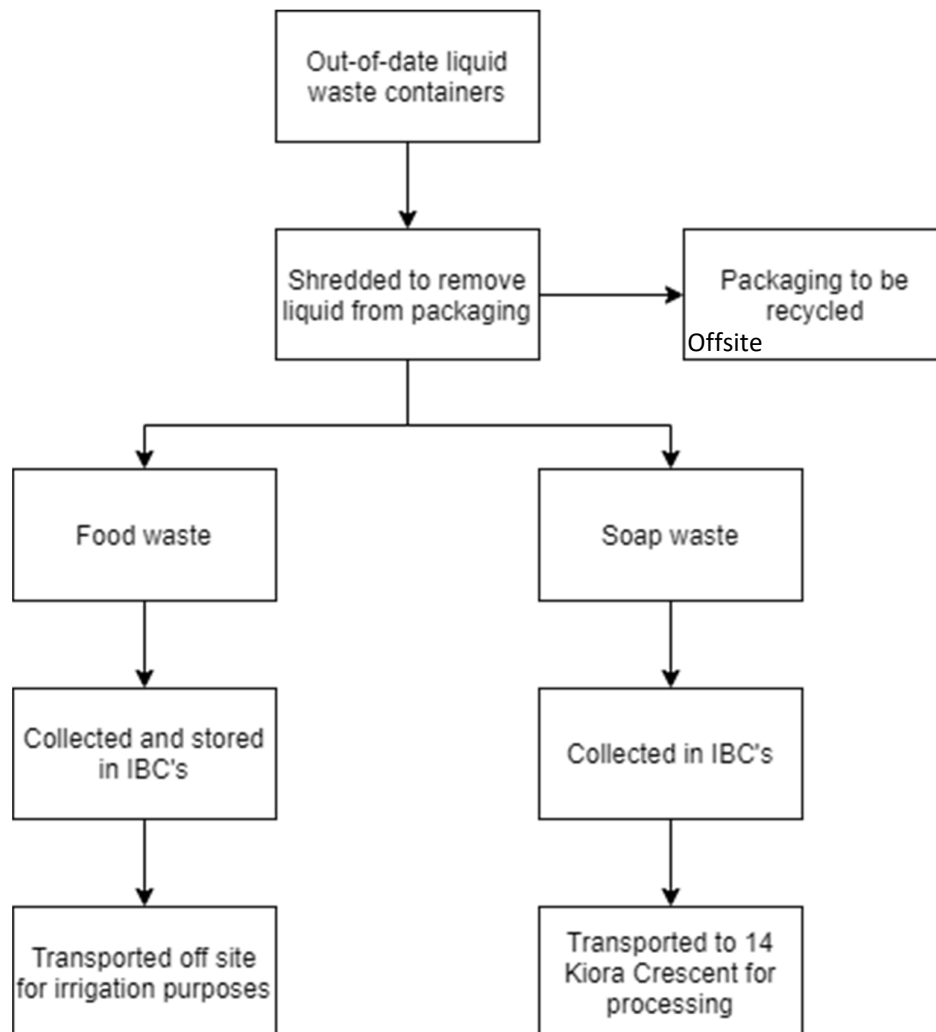
- Plastic: 950
- Cardboard: 950
- Aluminium: 950
- Liquid food waste: 4,600
- Liquid waste (other – for processing at 14 Kiora Crescent): 1,100
- Steel: 450
- Timber: 250
- Glass: 450
- Cloth: 200
- General solid waste: 100
- Total: 10,000**

The destruction and disposal of out-of-date liquid products/food wastes would involve the following:

- Out-of-date, expired or perishable liquid food waste (such as fruit juices, soft drinks, shampoos and soaps) are divided by waste stream (food waste/liquid soaps etc.) and fed into a shredder to separate liquids from packaging.
- Shredded packaging containers (cardboard, plastics, aluminium) are collected and recycled.
- Liquid food wastes are collected into intermediate bulk containers (IBCs) and stored at 16 Kiora Crescent.
- Liquid soap wastes are collected and sent to 14 Kiora Crescent for further processing.
- IBCs containing food waste are transported off site to be used in irrigation practices for agricultural properties/farmlands. The contents of the IBCs would comply with the relevant resource recover exemptions/orders and/or NSW Department of Environment and Conservation “Use of Effluent by Irrigation” (2004) and ANZECC & ARMICANZ “Guidelines for Fresh and Marine Water Quality” Volume 3, Primary Industries — Rationale and Background Information (Irrigation and general water uses, stock drinking water, aquaculture and human consumers of aquatic foods) (2000).

Figure 2-2 shows the process diagram for out-of-date liquid product destruction at 16 Kiora Crescent.

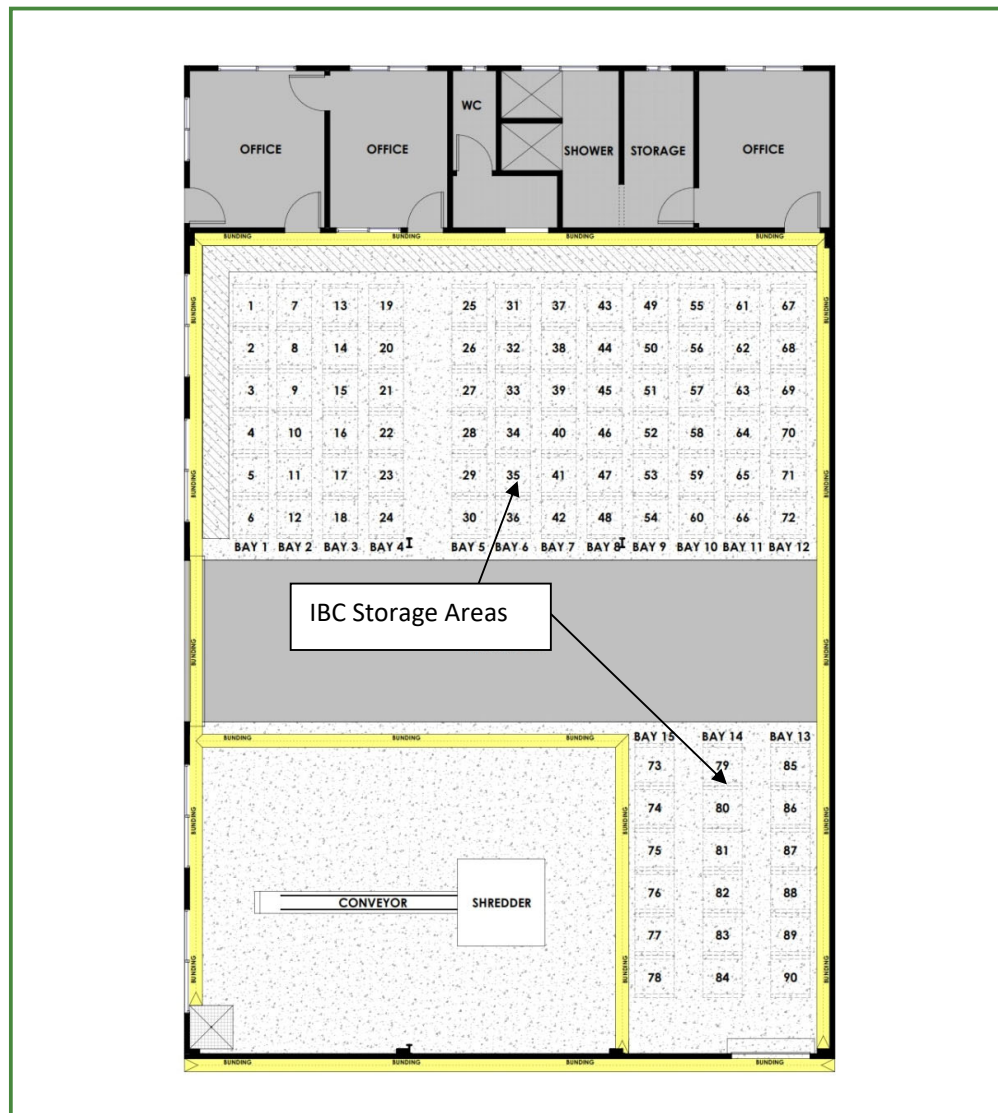
Figure 2-2: Process diagram of liquid product waste destruction



IBCs containing liquids transferred from 16 Kiora Crescent to 14 Kiora Crescent for further processing are delivered via forklift. The transit path is over the hardstand area in front of the buildings. The quantity of waste transferred is a maximum of 1,100 tpa which is an average of 3 IBCs per day.

The floorplan for 16 Kiora Crescent is shown below in Figure 2-3.

Figure 2-3: Proposed floor plan for product destruction processes at 16 Kiora Crescent



## 2.2 ON-SITE STORMWATER

The land parcel 14-16 Kiora Crescent is elevated above Kiora Crescent itself, thus the roadside verge in front of both properties, slopes down towards the road. All stormwater falling on the site is either directed into blind sumps or isolated (by bunded) stormwater pits/gutters, these are shown in the drainage plans in Attachment 1.

The combined building footprint of both facilities (14 and 16 Kiora Cres.) covers approx. 43% of the total land surface. Most stormwater falling onto the roofs is directed into downpipes that empty onto the hardstand surface. Water is then corralled by guttering at the property line into blind sumps or isolated stormwater pits/gutters and pumped into IBCs before being processed within the facility. A portion of stormwater collected from the roofs is also captured and stored into two slim-line water tanks. This water is used for general onsite activities including office and amenities and washing down surfaces within the facility.



External surface areas are all bunded into sections with each section containing blind sumps or isolated stormwater drains. These are isolated if a spill occurs. The bunded area directly in front of the tanker truck receiving dock, is directed into a sump pit and prevented from leaving the site. This is pumped into a storage tank to be treated before its disposal as trade waste.

### **2.2.1 Blind Sump Pits**

There are sealed and grated blind sump pits throughout the facility where liquid waste processing occurs. Details of the pits within each building are provided below.

#### **14 Kiora Crescent Building**

The facility contains five internal bunded areas with drains in each area leading to a blind sump pit. Three areas house the storage tanks, one area is for operational procedures the last is the receiving/dispatch area for tanker trucks. Incoming waste is pumped directly from the trucks into a receiving tank. Any wastewater runoff or spillage is captured within the bunded area and directed via a drain/s to the sump where it is pumped into a tank. Sump pits are checked and cleared regularly to ensure efficiency and excess wastewater is collected for treatment.

#### **16 Kiora Crescent Building**

The facility contains two internal bunded areas with each area graded to a blind sump pit. One area contains the shredder the other contains the IBC storage. Any wastewater runoff or spillage is captured within the bunded area and directed to the sump where it is pumped into an IBC, the spill liquids will be removed offsite or processed at 14 Kiora Cres. according to its waste type. Sump pits are checked and cleared regularly to ensure efficiency and excess wastewater is collected for treatment.

### **2.2.2 Discharge Points**

There are no discharge points to natural waterways.

Site stormwater is isolated and is treated on site. No runoff is released into the street stormwater system under normal circumstances. The connection to the outlet pipe to the street system is sealed.

Water collected during rain events is pumped from the isolation pits and processed in the facility. Overflow events are expected to only occur during very heavy periods of rainfall, where >50 mm of rain falls on the site within a 24 hour period. If the facility is unable to remove the excess stormwater during this period, potentially stormwater falling onto the facility's front area could spill over the bund and flow into the street and be directed into the local stormwater system.

Monitoring of stormwater is therefore recommended to be undertaken following very heavy rainfall events greater than 50 mm of rain in 24 hours.

### 2.2.3 Safeguards

A summary of the surface water environmental safeguards is provided as follows:

- Transfer of waste from tanker truck into storage tanks is a fully enclosed process;
- All work and process areas involving liquid wastes are within an enclosed building that is fully bunded;
- Sealed blind sump pits are located within bunded areas;
- Blind sump pits and storage tanks are checked for leaks/blockages regularly;
- The site is located on a fully sealed concrete hardstand surface;
- Procedures, signage and training in appropriate methods of how to avoid spills and what to do should they occur is provided; and
- Minor quantities of hazardous chemicals stored on site are fully enclosed and bunded in accordance with relevant standards.

All liquids stored on site are bunded in accordance with the requirements of AS 1940:2017 'The storage and handling of flammable and combustible liquids', outlined below.

#### **5.8.2 Bunding Capacity**

*The net capacity of a compound shall be at least 110% of the capacity of the largest tank or 25% of the total capacity of all tanks within the bund whichever is the greater. If two or more tanks are operated as a single unit, then the capacity of all such tanks shall be used when calculating the capacity of the compound.*

*NOTE: For Category 6 tanks, the capacity can be taken as the tank rated capacity.*

#### **4.4.3 Spillage containment**

*(d) The capacity of the spillage containment compound shall be at least 100% of the volume of the largest package plus 25% of the storage capacity up to 10 000 L, together with 10% of the storage capacity between 10,000 L and 100 000 L, and 5% above 100,000 L.*

## 2.3 NEAREST WATERWAYS AND RIPARIAN LANDS

There are no waterbodies located onsite. The nearest offsite source, Prospect Creek, is situated approximately 550 m due west from the site boundary (Figure 2-4). Prospect Creek is within the Georges River Catchment (Figure 2-5) and rises beneath Prospect Reservoir, 7.1 km north-west of the site. The creek flows for 26 km in a generally south-easterly direction through the local government areas of Cumberland, Liverpool and Bankstown, before reaching its confluence with the Georges River in Dhurawal Bay, Georges Hall almost 5 km directly south of the site. Georges River flows into Botany Bay, being the Bay's main tributary. The Georges River catchment spans an area of 930.9 km<sup>2</sup>.

Riparian vegetation lines both banks of Prospect Creek along its entire length. It is identified on the Holroyd LEP 2013 Riparian Lands and Watercourses Map (Figure 2-6).



Figure 2-4: Nearest Waterways

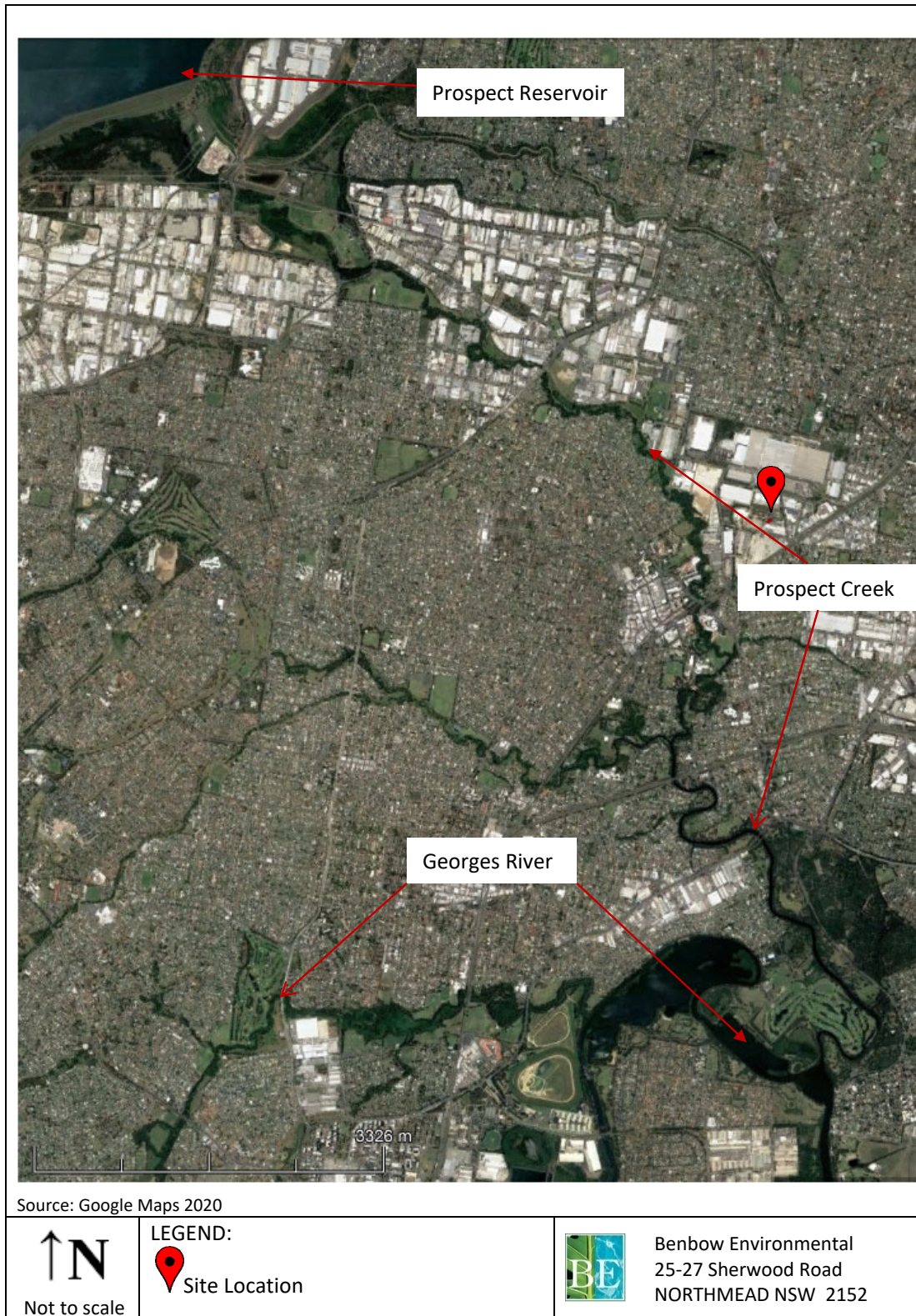
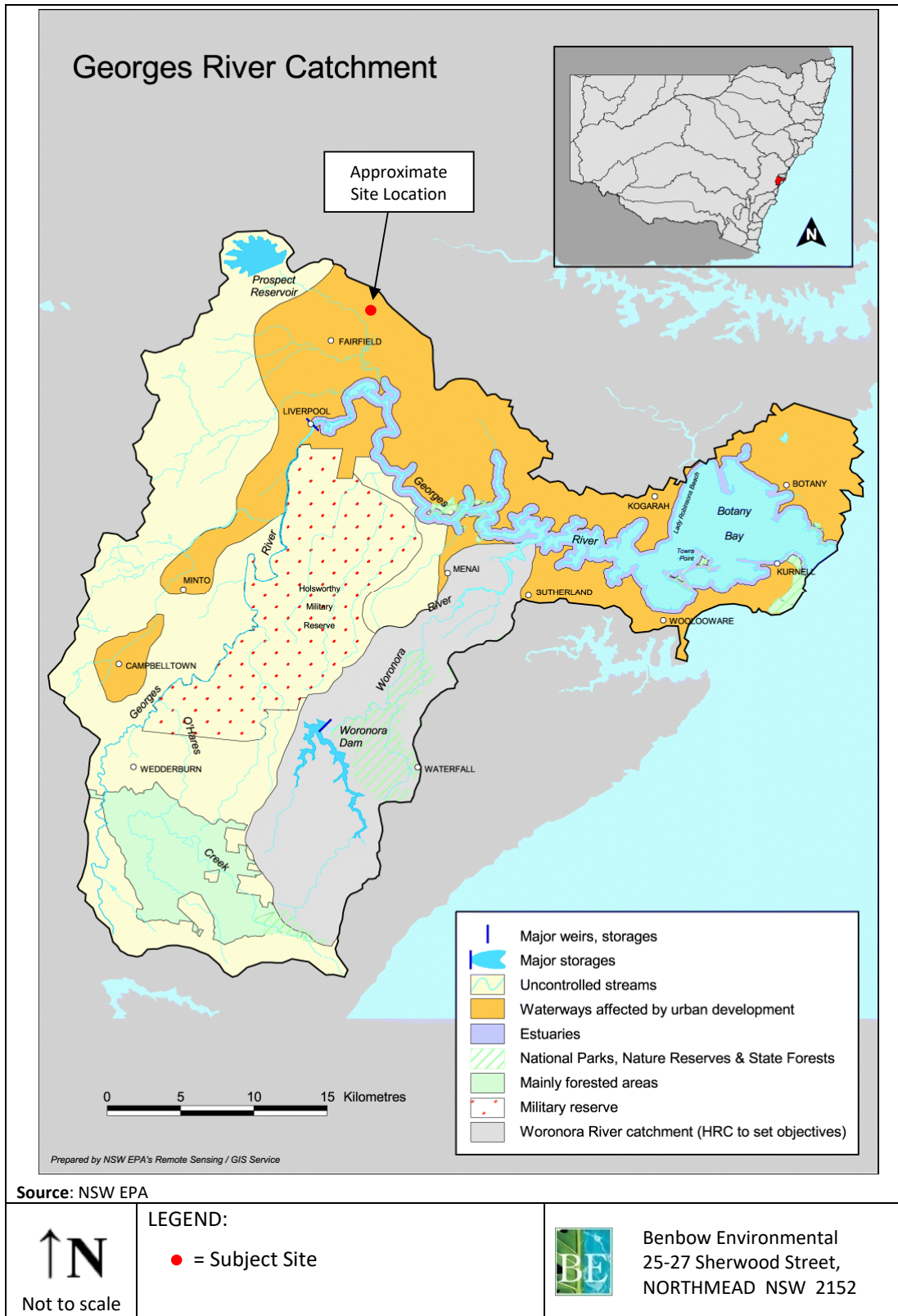




Figure 2-5: Georges River Catchment



The map shows the Yennora area with the following streets and features:

- Streets:** YENNORA, LOFTUS RD, WYNDHAM ST, NELSON RD, KODJA CR, and WOODS AVE.
- Highlighted Area:** A yellow triangle on Nelson Rd, adjacent to Kodja Cr.
- Other Features:** A green wavy line on the left side of the map, and a grey area at the bottom right.

 Not to scale	<b>LEGEND:</b>  - Site Location  - Riparian land	 Benbow Environmental 25-27 Sherwood Street, NORTHMEAD NSW 2152
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This section provides the Water Quality Objectives (WQOs) and the River Flow Objectives (RFOs) for the Georges River catchment, which should be used to develop plans and actions affecting water quality and river health. There are no discharges to waterways associated with the proposed development; nevertheless, WQOs and RFOs are provided for completeness of information on the potentially receiving waters.

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Table 2-1: Relevant Water Quality Objectives (WQOs)

WQO	Objective
Aquatic Ecosystems	<i>Maintaining or improving the ecological condition of waterbodies and their riparian zones over the long term</i>
Visual Amenity	<i>Aesthetic qualities of waters</i>
Secondary Contact Recreation	<i>Maintaining or improving water quality for activities such as boating and wading, where there is a low probability of water being swallowed</i>
Primary Contact Recreation	<i>Maintaining or improving water quality for activities such as swimming in which there is a high probability of water being swallowed</i>

Table 2-2: Relevant River Flow Objectives (RFOs)

RFO	Objective
Maintain wetland and floodplain inundation	<i>Maintain or restore the natural inundation patterns and distribution of floodwaters supporting natural wetland and floodplain ecosystems</i>
Maintain Natural Flow Variability	<i>Maintain or mimic natural flow variability in all streams</i>
Maintain Natural Rates of Change in Water Levels	<i>Maintain rates of rise and fall of river heights within natural bounds</i>
Minimise Effects of Weirs and Other Structures	<i>Minimise the impact of instream structures</i>

## 2.4 RAINFALL

The BoM IFD Design Rainfall Depth (mm) for the site area is provided in Table 2-3 below, and is derived from the 2016 Rainfall IFD Data System (Data issued 07 April 2022).

Table 2-3: Annual Exceedance Probability (AEP)

Duration	63.2%	50%	20%	10%	5%	2%	1%
<b>1 min</b>	2.09	2.31	3.02	3.51	3.97	4.59	5.07
<b>2 min</b>	3.43	3.72	4.68	5.37	6.07	6.97	7.69
<b>3 min</b>	4.76	5.20	6.60	7.59	8.58	9.88	10.9
<b>4 min</b>	5.98	6.57	8.43	9.72	11.0	12.7	14.0
<b>5 min</b>	7.09	7.81	10.1	11.7	13.2	15.3	16.9
<b>10 min</b>	11.2	12.5	16.5	19.1	21.7	25.1	27.7
<b>15 min</b>	14.0	15.6	20.6	23.9	27.2	31.4	34.6
<b>20 min</b>	16.1	17.9	23.5	27.3	31.0	35.8	39.4
<b>25 min</b>	17.7	19.7	25.8	29.9	33.8	39.1	43.1
<b>30 min</b>	19.0	21.1	27.5	31.9	36.1	41.7	46.0
<b>45 min</b>	22.1	24.4	31.5	36.4	41.2	47.6	52.4



Table 2-3: Annual Exceedance Probability (AEP)

Duration	63.2%	50%	20%	10%	5%	2%	1%
<b>1 hour</b>	24.4	26.8	34.4	39.7	44.9	51.9	57.3
<b>1.5 hour</b>	27.9	30.5	38.9	44.9	50.8	58.8	65.2
<b>2 hours</b>	30.7	33.5	42.7	49.2	55.8	64.8	72.0
<b>3 hours</b>	35.3	38.6	49.2	56.9	64.7	75.6	84.3
<b>4.5 hour</b>	40.9	44.8	57.8	67.1	76.7	90.2	101
<b>6 hours</b>	45.6	50.2	65.4	76.4	87.7	104	117
<b>9 hours</b>	53.4	59.4	78.9	93.1	108	128	145
<b>12 hours</b>	59.9	67.1	90.8	108	126	150	170
<b>18 hours</b>	70.4	79.7	111	133	157	188	213
<b>24 hours</b>	78.6	89.7	127	154	182	219	248
<b>30 hours</b>	85.4	97.9	140	171	203	245	277
<b>36 hours</b>	91.0	105	151	185	221	266	301
<b>48 hours</b>	99.8	115	168	207	249	299	337
<b>72 hours</b>	112	129	190	235	283	338	380
<b>96 hours</b>	119	138	202	250	300	357	400
<b>120 hours</b>	124	144	209	258	309	366	410
<b>144 hours</b>	128	148	213	261	312	369	413
<b>168 hours</b>	131	151	215	263	312	369	414

### 3. STATUTORY REQUIREMENTS

#### 3.1 LEGISLATION

The key pieces of legislation applicable to the management of water in NSW are listed below:

- Water Act 1912
- Water Management Act 2000
- Protection of the Environment Operations Act 1997

Clause 120 of the *Protection of the Environment Operations Act 1997* states the following:

*120 Prohibition of pollution of waters*

*(1) A person who pollutes any waters is guilty of an offence.*

*Note. An offence against subsection (1) committed by a corporation is an offence attracting special executive liability for a director or other person involved in the management of the corporation—see section 169.*

*(2) In this section:*

*pollute waters includes cause or permit any waters to be polluted.*

The proposed development will not breach the above clause with regard given to the proposed mitigation measures and safeguards to be implemented as described throughout this report.

#### 3.2 STANDARDS AND GUIDELINES

Relevant guidelines include:

- Australian and New Zealand Guidelines for Fresh and Marine Water (ANZG, 2018); and
- Australian and New Zealand Environment and Conservation Council (ANZECC) *Australian and New Zealand Guidelines for Fresh and Marine Water Quality Guidelines* (2000)).

#### 3.3 APPROVALS, LICENCES AND LEASES

##### 3.3.1 Development Consent Conditions

Consent conditions under SSD-10407 specific to the management of water are provided in the following table.

Table 3-1: Project Approval SSD-10407: Requirements relating to water

Condition	Requirement	Relevant Section
A6	The Applicant must not: receive or process more than 100,000 tonnes of industrial liquid waste per year; receive or process more than 10,000 tonnes combined of liquid product waste, liquid food waste, shoes, make up or clothes per year; store more than 377 tonnes of liquid waste at any one time (industrial liquid waste and liquid product waste) at the Liquid Waste Treatment Plant (LWTP) at 14 Kiora Crescent; store more than 100 tonnes (combined) of liquid product, liquid food waste, shoes, make up or clothes at any one time at Waste Processing Facility (WPF) at 16 Kiora Crescent; and receive dairy products, including out-of-date dairy products.	2
B14	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	5
B15	The Applicant must ensure the stormwater system does not direct contaminated stormwater to Council's stormwater system.	2.2

### 3.3.2 EPL Conditions

The EPL conditions specific to water management are stipulated in the table below.

Table 3-2: EPL requirements

Condition	Requirement	Relevant WMP Section
L1	<b>Pollution of Waters</b>	
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	This plan
O6.1	<b>Stormwater Management</b> The licensee must ensure that stormwater from all areas of the premises including driveways which have potential to have waste, fuel, oil or any chemical spillages must be controlled. The licensee must ensure that no waste, fuel, oil or any chemical spillage enters the stormwater.	5

### 3.3.3 Tradewaste Agreement

The facility operates under a tradewaste agreement and is required to undertake sampling and testing as per the Consent to discharge industrial trade wastewater. Further details are provided in Section 4.2 and Attachments 4 and 5.

## **4. WATER USAGE & SUPPLY**

The majority of site water requirements are obtained from mains supply via one water meter. Collected rainwater is reused for certain procedures such as surface cleaning.

Water is used on site predominantly in the wastewater filter systems to flush out contaminants in storage tanks. It is also used to wash external surfaces of vehicles, filters and storage containers in the operational area. Excess water from these activities is collected in blind sump pits which is processed through the treatment facility into settling tanks 1-4 before going into the DAF. Wastewater from the DAF is discharged as tradewaste and the DAF sludge is transferred to tanks 12/13 to be collected by a licence waste contractor for removal offsite.

No water is discharged to waterways.

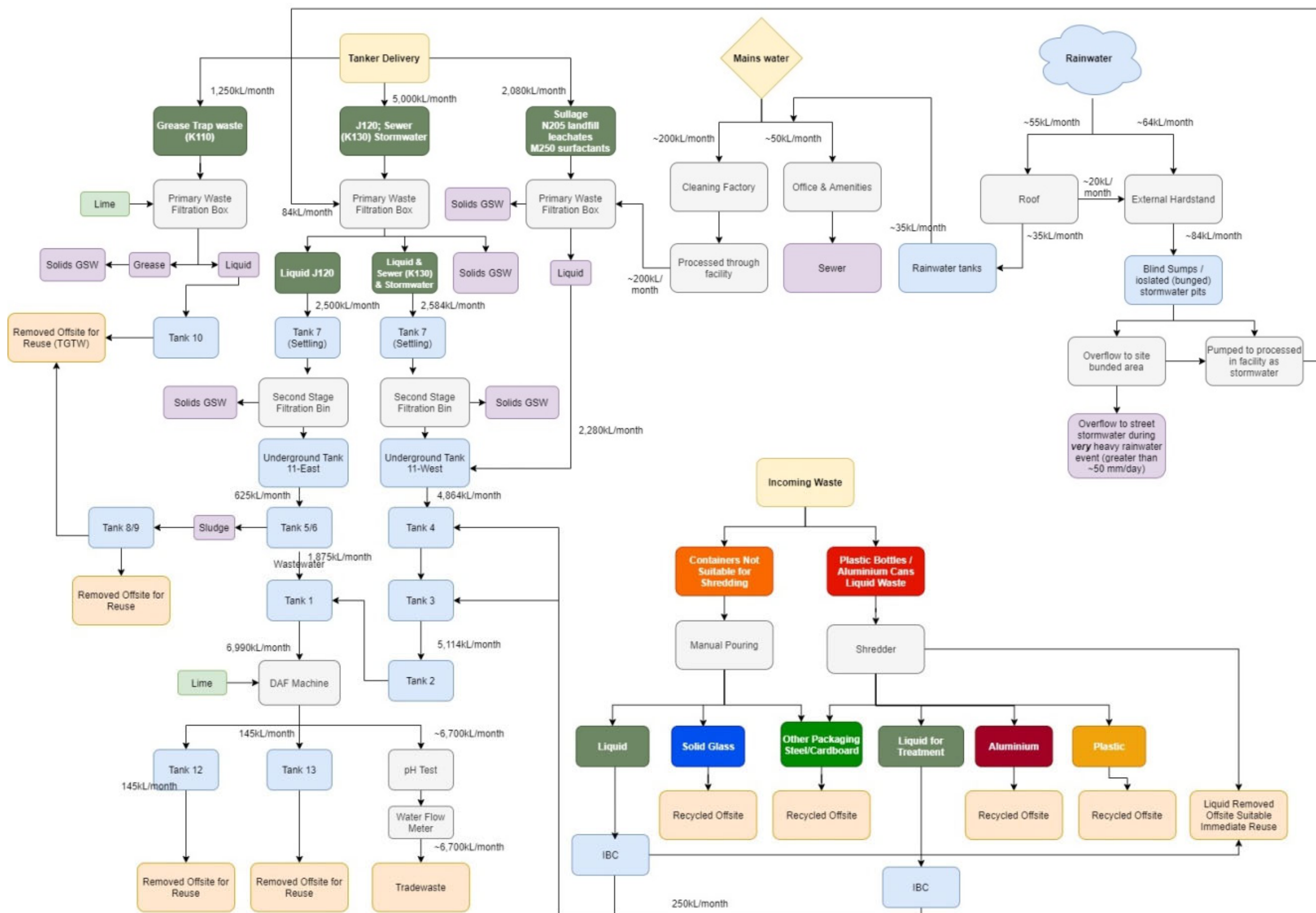
### **4.1 SITE WATER BALANCE**

The following figure shows the site's water balance.

The water usage from the site is based off water utility bills of the current operations. The rainwater is based on the surface areas of the site and the mean rainfall from BOM Bankstown AWS climate statistics data. A flow chart depicting the site water balance is shown in Figure 4-1.



Figure 4-1: Flow Chart Depicting the Site Water Balance – Proposed Development







## 4.2 WASTEWATER

As the core nature of the business involves the treatment and storage of liquid wastes, wastewater is both collected and produced through a number of onsite processes. These include:

- Filtering, storage and treatment of wastewaters;
- Washing down and cleaning vehicles and hardstand operational areas;
- General wastewater from office amenities.

Wastewater is treated and processed before being discharged into the tradewaste system, in accordance with a tradewaste agreement from Sydney Water (*Consent to Discharge Industrial Trade Wastewater Agreement*) The current agreement is provided as Attachment 4. An application to modify the agreement was submitted on 16 September 2021 (Attachment 5) and the new agreement is forthcoming. Details of the new agreement include:

### Rate of Discharge (estimates):

Maximum instantaneous rate of discharge to the wastewater system:	6 litres/second
Maximum daily rate of discharge to the wastewater system:	250,000 Litres
Average daily rate of discharge to the wastewater system:	220,000 Litres

Trade wastewater substances that will be required to be discharged below specified concentrations in the agreement include:

- Ammonia (As N)
- Biochemical Oxygen Demand
- Suspended Solids
- Grease
- Sulphate
- Copper
- Iron
- Sulphide
- Zinc

Wastewater from all office amenities is piped directly into the mains sewer.

## 5. SURFACE WATER MANAGEMENT

### 5.1 SURFACE WATER MONITORING PROGRAM

#### 5.1.1 Impact Assessment Criteria

A conceptual site model (CSM) in accordance with the National Environment Protection (Assessment of Site Contamination) Measure as amended in 2013 was prepared for the facility. The CSM is a representation of site-related information regarding contamination sources, contaminants of concern, exposure pathways and the implemented safeguards in place. This informed the potential pollutants within the monitoring program which include:

- Heavy metals - eight metals in total, Arsenic, Cadmium, Chromium, Copper, Nickel, Lead, Zinc and Mercury;
- Total Recoverable Hydrocarbons (TRH – C6 - C40);
- BTEXN – Benzene, Toluene, Ethylbenzene, Xylenes and Naphthalene;
- Polycyclic Aromatic Hydrocarbons (PAH);
- Volatile Organic Compounds (VOC); and
- Nutrients.

These potential pollutants may be contained in:

- Grease trap waste;
- Septic waste;
- Sewage sludge;
- Surfactants; and
- Oily water.

##### 5.1.1.1 Relevant Trigger Values

Criteria “trigger levels” were established from the Australian and New Zealand Guidelines for Fresh and Marine Water (ANZG, 2018) or the Australian and New Zealand Environment and Conservation Council (ANZECC) *Australian and New Zealand Guidelines for Fresh and Marine Water Quality Guidelines* (2000) where trigger levels are not provided by the 2018 guidelines. The criteria parameters relevant to the site are “slightly–moderately disturbed systems” and the conservative 90 to 95% protection value for freshwater was selected.

Table 5-1: Relevant Trigger Levels

Analytes	Trigger Value
<b>Metals</b>	
Arsenic (III)	24 µg/L
Arsenic (V)	13 µg/L
Cadmium	0.02 µg/L
Chromium (VI)	1.0 µg/L
Copper	1.4 µg/L
Lead	3.4 µg/L
Nickel	11 µg/L
Zinc	8.0 µg/L
Mercury (inorganic)	0.06 µg/L
<b>Sulfonated Compounds</b>	
Carbon Sulfide	20 µg/L
<b>Physical</b>	
pH	6.5 – 8.0 (low to upper limit)
Electrical Conductivity	200 - 300 µS/cm
Total Suspended Solids	50 mg/L
<b>BTEXN</b>	
Benzene	950 µg/L
Toluene	180 µg/L
Ethylbenzene	80 µg/L
m-Xylene	75 µg/L
o-Xylene	350 µg/L
p-Xylene	200 µg/L
Naphthalene	16 µg/L
<b>Total Recoverable Hydrocarbons</b>	
TRH (C10 -C40)	No visual appearance^
<b>Trihalomethanes</b>	
Chloroform	770 µg/L
Bromodichloromethane	770 µg/L
<b>Nutrients</b>	
Oxides of Nitrogen	40 µg/L
Filterable Reactive Phosphorus	20 µg/L
Total Ammonia	900 µg/L (at pH 8)

^ The criteria is *exceeded* if a sheen (rainbow effect) is observed on the water's surface

### 5.1.2 Baseline Data

Stormwater Characterisation was undertaken as part of the Environmental Impact Statement on 28 July 2020. Laboratory results are provided as Attachment 3. Samples were collected from two (2) on site stormwater pits at the commencement of an independent rain event; one sample from 16 Kiora (S-1) and one sample from 14 Kiora (S-2).

Criteria “trigger levels” were established from the Australian and New Zealand Guidelines for Fresh and Marine Water (ANZG, 2018) or the Australian and New Zealand Environment and Conservation Council (ANZECC) *Australian and New Zealand Guidelines for Fresh and Marine Water Quality Guidelines* (2000) where trigger levels are not provided by the 2018 guidelines. The criteria parameters relevant to the site are “slightly–moderately disturbed systems” and the conservative 95% protection value for freshwater was selected. For a small number of contaminants due to low confidence data or bioaccumulation effects, species protection levels have been raised to the recommended 95% or 99% level of protection. Figures are the toxicant default guideline values (DGVs) sourced from the Australian & New Zealand Guidelines for Fresh & Marine Water Quality for aquatic ecosystems.

### 5.1.3 Monitoring Points

Two monitoring points have been selected for the stormwater monitoring program. These are:

- S-1: Blind pit at 16 Kiora Cres;
- S-2: Blind pit at 14 Kiora Cres.





These are shown in Figure 5-1.



Figure 5-1: Monitoring Points



Source: NSW Planning Portal

<div><div></div><div>Not to scale</div></div>	<div>LEGEND:</div> <div><div></div><div>Site Boundary</div></div> <div><div></div><div>Surface Water Monitoring Point</div></div>	<div></div> <div>Benbow Environmental 25-27 Sherwood Street, Northmead NSW 2152</div>
--	---	--

#### 5.1.4 Sampling Requirements

Sampling where possible should be undertaken by an independent qualified third party in accordance with *AS/NZS 5667.1:1998 – Water quality – Sampling*.

##### 5.1.4.1 Frequency of Sampling

Sampling shall be undertaken as follows:

- At least twice a year, following a heavy rainfall event greater than 3 mm of rain; and
- During and after the clean-up operation of any major spillage.

##### 5.1.4.2 Parameters

Samples are to be tested for:

- Heavy metals (eight in total): Arsenic, Cadmium, Chromium, Copper, Nickel, Lead, Zinc and Mercury;
- TRH (C6 - C40);
- BTEXN;
- PAH;
- VOC; and
- Nutrients

Relevant trigger values are shown in Table 5-1.

##### 5.1.4.3 Collection of samples for monitoring:

Following a relevant rainfall event or spill clean-up, samples will be taken from the middle of the blind pit. Protective gloves need to be worn by the sample. It is imperative that the sampler chooses the appropriate collection bottle specifically applicable for each contaminant. Sample bottles can be collected from the laboratory chosen to perform the analysis, prior to sampling. This ensures the correct bottle type, preservatives and number of containers are used.

Each bottle will have a label, onto which would be entered the following information:

- Date and time of sampling;
- Sample number and other identification;
- The analysis required;
- Sample location; and
- Sample name.

An indelible ink pen should be used for labelling purposes. Once collected, each sample should immediately be placed on ice and stored in an Esky. Samples must be kept chilled (not frozen) at <4° C and delivered, preferably, on the day of the sampling to a NATA accredited laboratory. Samples must be accompanied with a completed chain of custody form (Analysis Request Sheet)

### 5.1.5 Monitoring Records

Monitoring results would be collated into a spreadsheet as per Attachment 2 and uploaded to the Enviro Waste website. All records would be maintained for the life of the project.

### 5.1.6 Exceedance Protocol

If an exceedance of the trigger values is reported this will require the following initial investigation:

Enviro Waste or nominated qualified consultant will:

- Confirm the date and location of the exceedance;
- Confirm the parameter/criteria that has been exceeded;
- Identify any potential contributing factors and/or source of pollution/leak/overflow;
- Assess the monitoring results against background trends to identify any anomalies;
- Determine from meteorological conditions at the time of and leading up to the exceedance whether the rain event had the potential to overflow the blind pit and be discharged into the street stormwater system. If yes, obtain advice of a third-party expert.
- Implement mitigation measures. These would need to be decided on a case-by-case basis. Depending on the source of the pollution, mitigation measures may include:
  - ▶ In the event of a leak or overflow due to faulty bunding / containment, provide temporary containment such as sandbags or spill containment socks to prevent further leakages as an immediate mitigation measure.
  - ▶ Repair pollution control equipment including integrity of sumps, bunding, tanks and piping as needed;
  - ▶ Clean the external hardstand area in the event of vehicle tracking and/or possible fuel leak resulting in release of pollutants;
  - ▶ Clean bunded areas in the event of a spill within these areas;
- Re-sample at point of exceedance to confirm compliance. If the monitoring again exceeds then obtain advice of an independent suitably qualified consultant to conduct a full investigation.

## 5.2 SPILL MANAGEMENT PROCEDURE

A spill management procedure is provided in the OEMP as Procedure No. 3 in OEMP Attachment A4.

## 5.3 CONTINGENCY PLAN

Climate change Rising temperature and sea levels are expected to increase the frequency and severity of storm events. This may increase the likelihood of wet weather events leading to stormwater release from the site. Contingency measures for this issue can include increasing the capacity of the sump pits if required.

Any exceedances with trigger values shall be dealt with in accordance with the Exceedance Protocol in Section 5.1.6.



## 6. PLAN IMPLEMENTATION AND ADMINISTRATION

### 6.1 TRAINING

Training in stormwater management is essential for all staff working at the site and a program of training to be undertaken and records to be maintained is provided in the OEMP.

### 6.2 INCIDENTS AND NON-COMPLIANCES

All incidents and non-compliances related to stormwater management are to be dealt with in accordance with the OEMP.

### 6.3 COMPLAINTS

All complaints related to waste are to be dealt with in accordance with the OEMP.

### 6.4 SWMP REVIEW

Throughout operation, certain circumstances may change and as a result, modifications and/or refinements to the SWMP may be required to ensure waste management and procedures remain applicable. Review of the SWMP is required under conditions C5 of consent SSD-10407 within 3 months of:

- a) The submission of a Compliance Report under Condition C11;
- b) The submission of an incident report under Condition C7;
- c) The submission of an independent environmental audit under Condition C13;
- d) The approval of any modification of the conditions of consent SSD-10407; or
- e) The issue of a direction of the Planning Secretary under Condition A2(b) which requires a review.

The reviews shall be undertaken by the Managing Director and/or delegate such as an external environmental consultant.

Outcomes of the SWMP reviews may require modifications to the plan and related documentation. Any revisions would need to be submitted to the Planning Secretary for approval within 6 weeks of the review. Any changes would be communicated to personnel through toolbox talks.

This concludes the report.



Linda Zanotto  
Senior Environmental Engineer



Victoria Hale  
Senior Environmental Scientist



R T Benbow  
Principal Consultant



Damien Thomas  
Environmental Scientist





## 7. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of Enviro Waste Services Group Pty Ltd, as per our agreement for providing environmental services. Only Enviro Waste Services Group Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by Enviro Waste Services Group Pty Ltd for the purposes of preparing this report.

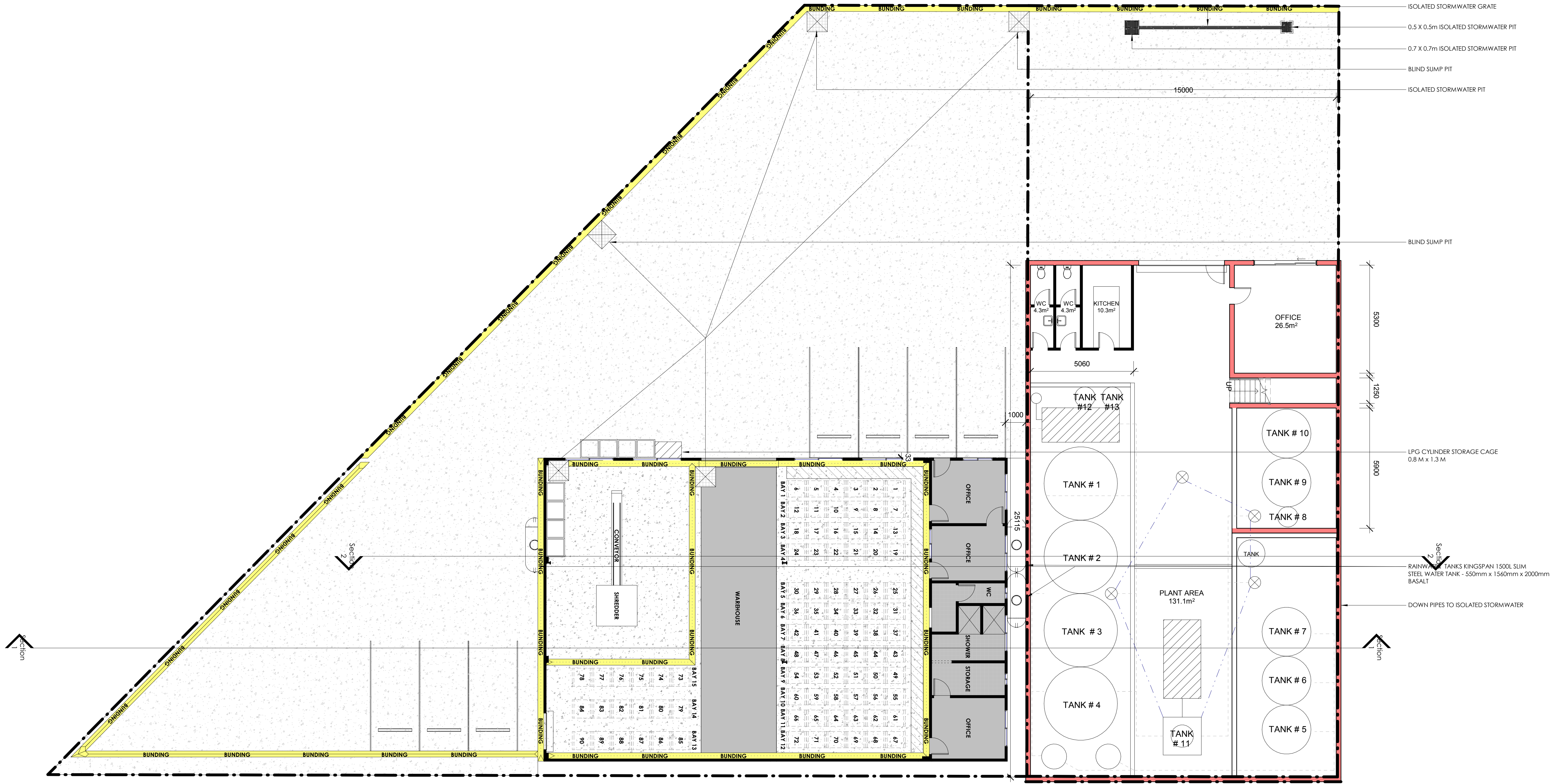
Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

## **ATTACHMENTS**



1 : 100  
DRAINAGE PLAN

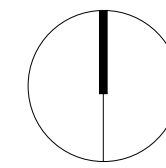
REV	DESCRIPTION	DATE	BY
A	APPLICATION FOR APPROVAL	26 06 20	



FOR DA APPROVAL

**baini**design

**BAINI DESIGN**  
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18 Villiers street  
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Sydney, Australia  
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www.bainidesign.com.au



PROJECT TITLE  
**PROPOSED INDUSTRIAL ALTERATION AND ADDITION  
14 - 16 Kiara Crescent, Yennora**

DRAWING TITLE  
**DRAINAGE PLAN**

PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
<b>20097</b>	03	06/26/20	A
SCALE @ A1	DRAWN BY	CHECKED BY	
1 : 100	GA	CB	

This drawing is copyright and the property of Baini Design. Larger scale drawings and written dimensions take preference. Do not scale from drawing all dimensions to be verified on site before commencement of work. All discrepancies to be brought to the attention of the author.

## Attachment 2: Surface Water Baseline Data and Monitoring Records

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## Surface water baseline data and monitoring records – Page 1

[illegible]

## Surface water baseline data and monitoring records – Page 2

[illegible]





## CERTIFICATE OF ANALYSIS

**Work Order** : **ES2025861**  
**Client** : **BENBOW ENVIRONMENTAL**  
**Contact** : Matthew Taylor  
**Address** : 25-27 SHERWOOD STREET  
 NORTHMEAD NSW, AUSTRALIA 2152  
**Telephone** : ----  
**Project** : 191251\_Stormwater  
**Order number** : 191251  
**C-O-C number** : ----  
**Sampler** : Matthew Taylor  
**Site** : ----  
**Quote number** : EN/222  
**No. of samples received** : 6  
**No. of samples analysed** : 6

**Page** : 1 of 9  
**Laboratory** : Environmental Division Sydney  
**Contact** : Customer Services ES  
**Address** : 277-289 Woodpark Road Smithfield NSW Australia 2164  
**Telephone** : +61-2-8784 8555  
**Date Samples Received** : 28-Jul-2020 10:20  
**Date Analysis Commenced** : 28-Jul-2020  
**Issue Date** : 04-Aug-2020 13:55



Accreditation No. 825  
 Accredited for compliance with  
 ISO/IEC 17025 - Testing

This report supersedes any previous report(s) with this reference. Results apply to the sample(s) as submitted. This document shall not be reproduced, except in full.

This Certificate of Analysis contains the following information:

- General Comments
- Analytical Results
- Surrogate Control Limits

**Additional information pertinent to this report will be found in the following separate attachments: Quality Control Report, QA/QC Compliance Assessment to assist with Quality Review and Sample Receipt Notification.**

### Signatories

This document has been electronically signed by the authorized signatories below. Electronic signing is carried out in compliance with procedures specified in 21 CFR Part 11.

Signatories	Position	Accreditation Category
Ankit Joshi	Inorganic Chemist	Sydney Inorganics, Smithfield, NSW
Edwandy Fadjjar	Organic Coordinator	Sydney Organics, Smithfield, NSW
Ivan Taylor	Analyst	Sydney Inorganics, Smithfield, NSW



## General Comments

The analytical procedures used by ALS have been developed from established internationally recognised procedures such as those published by the USEPA, APHA, AS and NEPM. In house developed procedures are fully validated and are often at the client request.

Where moisture determination has been performed, results are reported on a dry weight basis.

Where a reported less than (<) result is higher than the LOR, this may be due to primary sample extract/digestate dilution and/or insufficient sample for analysis.

Where the LOR of a reported result differs from standard LOR, this may be due to high moisture content, insufficient sample (reduced weight employed) or matrix interference.

When sampling time information is not provided by the client, sampling dates are shown without a time component. In these instances, the time component has been assumed by the laboratory for processing purposes.

Where a result is required to meet compliance limits the associated uncertainty must be considered. Refer to the ALS Contact for details.

Key : CAS Number = CAS registry number from database maintained by Chemical Abstracts Services. The Chemical Abstracts Service is a division of the American Chemical Society.

LOR = Limit of reporting

^ = This result is computed from individual analyte detections at or above the level of reporting

Ø = ALS is not NATA accredited for these tests.

~ = Indicates an estimated value.

- EP075 (SIM): Where reported, Benzo(a)pyrene Toxicity Equivalent Quotient (TEQ) per the NEPM (2013) is the sum total of the concentration of the eight carcinogenic PAHs multiplied by their Toxicity Equivalence Factor (TEF) relative to Benzo(a)pyrene. TEF values are provided in brackets as follows: Benz(a)anthracene (0.1), Chrysene (0.01), Benzo(b+j) & Benzo(k)fluoranthene (0.1), Benzo(a)pyrene (1.0), Indeno(1.2.3.cd)pyrene (0.1), Dibenz(a,h)anthracene (1.0), Benzo(g,h,i)perylene (0.01). Less than LOR results for 'TEQ Zero' are treated as zero.
- EP080: Where reported, Total Xylenes is the sum of the reported concentrations of m&p-Xylene and o-Xylene at or above the LOR.
- Samples containing fine particulate matter less than 1.2 µm may bias low for TSS via EA025H.
- EP074: Where reported, Total Trihalomethanes is the sum of the reported concentrations of all Trihalomethanes at or above the LOR.
- EP074: Where reported, Total Trimethylbenzenes is the sum of the reported concentrations of 1.2.3-Trimethylbenzene, 1.2.4-Trimethylbenzene and 1.3.5-Trimethylbenzene at or above the LOR.
- EP075(SIM): Where reported, Total Cresol is the sum of the reported concentrations of 2-Methylphenol and 3- & 4-Methylphenol at or above the LOR.



## Analytical Results

Sub-Matrix: WATER (Matrix: WATER)				Client sample ID				
Client sampling date / time				S-1	S-1	S-2	S-2	S-1
Compound				28-Jul-2020 09:45	28-Jul-2020 09:45	28-Jul-2020 09:25	28-Jul-2020 09:25	28-Jul-2020 09:45
CAS Number	LOR	Unit		ES2025861-001	ES2025861-002	ES2025861-003	ES2025861-004	ES2025861-005
				Result	Result	Result	Result	Result
<b>EA005P: pH by PC Titrator</b>								
pH Value	----	0.01	pH Unit	----	----	----	----	8.41
<b>EA010P: Conductivity by PC Titrator</b>								
Electrical Conductivity @ 25°C	----	1	µS/cm	----	----	----	----	223
<b>EA025: Total Suspended Solids dried at 104 ± 2°C</b>								
Suspended Solids (SS)	----	5	mg/L	----	----	----	----	29
<b>EG020F: Dissolved Metals by ICP-MS</b>								
Arsenic	7440-38-2	0.001	mg/L	<0.001	----	<0.001	----	----
Cadmium	7440-43-9	0.0001	mg/L	<0.0001	----	<0.0001	----	----
Chromium	7440-47-3	0.001	mg/L	<0.001	----	<0.001	----	----
Copper	7440-50-8	0.001	mg/L	0.006	----	0.001	----	----
Nickel	7440-02-0	0.001	mg/L	0.001	----	<0.001	----	----
Lead	7439-92-1	0.001	mg/L	<0.001	----	<0.001	----	----
Zinc	7440-66-6	0.005	mg/L	0.092	----	0.034	----	----
<b>EG035F: Dissolved Mercury by FIMS</b>								
Mercury	7439-97-6	0.0001	mg/L	<0.0001	----	<0.0001	----	----
<b>EP074A: Monocyclic Aromatic Hydrocarbons</b>								
Styrene	100-42-5	5	µg/L	----	<5	----	<5	----
Isopropylbenzene	98-82-8	5	µg/L	----	<5	----	<5	----
n-Propylbenzene	103-65-1	5	µg/L	----	<5	----	<5	----
1,3,5-Trimethylbenzene	108-67-8	5	µg/L	----	<5	----	<5	----
sec-Butylbenzene	135-98-8	5	µg/L	----	<5	----	<5	----
1,2,4-Trimethylbenzene	95-63-6	5	µg/L	----	<5	----	<5	----
tert-Butylbenzene	98-06-6	5	µg/L	----	<5	----	<5	----
p-Isopropyltoluene	99-87-6	5	µg/L	----	<5	----	<5	----
n-Butylbenzene	104-51-8	5	µg/L	----	<5	----	<5	----
<b>EP074B: Oxygenated Compounds</b>								
Vinyl Acetate	108-05-4	50	µg/L	----	<50	----	<50	----
2-Butanone (MEK)	78-93-3	50	µg/L	----	<50	----	<50	----
4-Methyl-2-pentanone (MIBK)	108-10-1	50	µg/L	----	<50	----	<50	----
2-Hexanone (MBK)	591-78-6	50	µg/L	----	<50	----	<50	----
<b>EP074C: Sulfonated Compounds</b>								
Carbon disulfide	75-15-0	5	µg/L	----	<5	----	18	----
<b>EP074D: Fumigants</b>								
2,2-Dichloropropane	594-20-7	5	µg/L	----	<5	----	<5	----

Sub-Matrix: WATER (Matrix: WATER)				Client sample ID	S-1	S-1	S-2	S-2	S-1
Client sampling date / time				28-Jul-2020 09:45	28-Jul-2020 09:45	28-Jul-2020 09:25	28-Jul-2020 09:25	28-Jul-2020 09:45	
Compound	CAS Number	LOR	Unit	ES2025861-001	ES2025861-002	ES2025861-003	ES2025861-004	ES2025861-005	
				Result	Result	Result	Result	Result	
EP074D: Fumigants - Continued									
1.2-Dichloropropane	78-87-5	5	µg/L	----	<5	----	<5	----	
cis-1.3-Dichloropropylene	10061-01-5	5	µg/L	----	<5	----	<5	----	
trans-1.3-Dichloropropylene	10061-02-6	5	µg/L	----	<5	----	<5	----	
1.2-Dibromoethane (EDB)	106-93-4	5	µg/L	----	<5	----	<5	----	
EP074E: Halogenated Aliphatic Compounds									
Dichlorodifluoromethane	75-71-8	50	µg/L	----	<50	----	<50	----	
Chloromethane	74-87-3	50	µg/L	----	<50	----	<50	----	
Vinyl chloride	75-01-4	50	µg/L	----	<50	----	<50	----	
Bromomethane	74-83-9	50	µg/L	----	<50	----	<50	----	
Chloroethane	75-00-3	50	µg/L	----	<50	----	<50	----	
Trichlorofluoromethane	75-69-4	50	µg/L	----	<50	----	<50	----	
1.1-Dichloroethene	75-35-4	5	µg/L	----	<5	----	<5	----	
Iodomethane	74-88-4	5	µg/L	----	<5	----	<5	----	
trans-1.2-Dichloroethene	156-60-5	5	µg/L	----	<5	----	<5	----	
1.1-Dichloroethane	75-34-3	5	µg/L	----	<5	----	<5	----	
cis-1.2-Dichloroethene	156-59-2	5	µg/L	----	<5	----	<5	----	
1.1.1-Trichloroethane	71-55-6	5	µg/L	----	<5	----	<5	----	
1.1-Dichloropropylene	563-58-6	5	µg/L	----	<5	----	<5	----	
Carbon Tetrachloride	56-23-5	5	µg/L	----	<5	----	<5	----	
1.2-Dichloroethane	107-06-2	5	µg/L	----	<5	----	<5	----	
Trichloroethene	79-01-6	5	µg/L	----	<5	----	<5	----	
Dibromomethane	74-95-3	5	µg/L	----	<5	----	<5	----	
1.1.2-Trichloroethane	79-00-5	5	µg/L	----	<5	----	<5	----	
1.3-Dichloropropane	142-28-9	5	µg/L	----	<5	----	<5	----	
Tetrachloroethene	127-18-4	5	µg/L	----	<5	----	<5	----	
1.1.1.2-Tetrachloroethane	630-20-6	5	µg/L	----	<5	----	<5	----	
trans-1.4-Dichloro-2-butene	110-57-6	5	µg/L	----	<5	----	<5	----	
cis-1.4-Dichloro-2-butene	1476-11-5	5	µg/L	----	<5	----	<5	----	
1.1.2.2-Tetrachloroethane	79-34-5	5	µg/L	----	<5	----	<5	----	
1.2.3-Trichloropropane	96-18-4	5	µg/L	----	<5	----	<5	----	
Pentachloroethane	76-01-7	5	µg/L	----	<5	----	<5	----	
1.2-Dibromo-3-chloropropane	96-12-8	5	µg/L	----	<5	----	<5	----	
Hexachlorobutadiene	87-68-3	5	µg/L	----	<5	----	<5	----	
EP074F: Halogenated Aromatic Compounds									

Sub-Matrix: WATER (Matrix: WATER)				Client sample ID	S-1	S-1	S-2	S-2	S-1
Client sampling date / time				28-Jul-2020 09:45	28-Jul-2020 09:45	28-Jul-2020 09:25	28-Jul-2020 09:25	28-Jul-2020 09:25	28-Jul-2020 09:45
Compound	CAS Number	LOR	Unit	ES2025861-001	ES2025861-002	ES2025861-003	ES2025861-004	ES2025861-005	
				Result	Result	Result	Result	Result	
EP074F: Halogenated Aromatic Compounds - Continued									
Chlorobenzene	108-90-7	5	µg/L	----	<5	----	<5	----	
Bromobenzene	108-86-1	5	µg/L	----	<5	----	<5	----	
2-Chlorotoluene	95-49-8	5	µg/L	----	<5	----	<5	----	
4-Chlorotoluene	106-43-4	5	µg/L	----	<5	----	<5	----	
1.3-Dichlorobenzene	541-73-1	5	µg/L	----	<5	----	<5	----	
1.4-Dichlorobenzene	106-46-7	5	µg/L	----	<5	----	<5	----	
1.2-Dichlorobenzene	95-50-1	5	µg/L	----	<5	----	<5	----	
1.2.4-Trichlorobenzene	120-82-1	5	µg/L	----	<5	----	<5	----	
1.2.3-Trichlorobenzene	87-61-6	5	µg/L	----	<5	----	<5	----	
EP074G: Trihalomethanes									
Chloroform	67-66-3	5	µg/L	----	21	----	<5	----	
Bromodichloromethane	75-27-4	5	µg/L	----	10	----	<5	----	
Dibromochloromethane	124-48-1	5	µg/L	----	<5	----	<5	----	
Bromoform	75-25-2	5	µg/L	----	<5	----	<5	----	
EP075(SIM)B: Polynuclear Aromatic Hydrocarbons									
Naphthalene	91-20-3	1.0	µg/L	----	<1.0	----	<1.0	----	
Acenaphthylene	208-96-8	1.0	µg/L	----	<1.0	----	<1.0	----	
Acenaphthene	83-32-9	1.0	µg/L	----	<1.0	----	<1.0	----	
Fluorene	86-73-7	1.0	µg/L	----	<1.0	----	<1.0	----	
Phenanthrene	85-01-8	1.0	µg/L	----	<1.0	----	<1.0	----	
Anthracene	120-12-7	1.0	µg/L	----	<1.0	----	<1.0	----	
Fluoranthene	206-44-0	1.0	µg/L	----	<1.0	----	<1.0	----	
Pyrene	129-00-0	1.0	µg/L	----	<1.0	----	<1.0	----	
Benz(a)anthracene	56-55-3	1.0	µg/L	----	<1.0	----	<1.0	----	
Chrysene	218-01-9	1.0	µg/L	----	<1.0	----	<1.0	----	
Benzo(b+j)fluoranthene	205-99-2	205-82-3	1.0	µg/L	<1.0	----	<1.0	----	
Benzo(k)fluoranthene	207-08-9	1.0	µg/L	----	<1.0	----	<1.0	----	
Benzo(a)pyrene	50-32-8	0.5	µg/L	----	<0.5	----	<0.5	----	
Indeno(1.2.3.cd)pyrene	193-39-5	1.0	µg/L	----	<1.0	----	<1.0	----	
Dibenz(a.h)anthracene	53-70-3	1.0	µg/L	----	<1.0	----	<1.0	----	
Benzo(g,h,i)perylene	191-24-2	1.0	µg/L	----	<1.0	----	<1.0	----	
^ Sum of polycyclic aromatic hydrocarbons	----	0.5	µg/L	----	<0.5	----	<0.5	----	
^ Benzo(a)pyrene TEQ (zero)	----	0.5	µg/L	----	<0.5	----	<0.5	----	
EP080/071: Total Petroleum Hydrocarbons									



## Analytical Results

Sub-Matrix: **WATER**  
 (Matrix: **WATER**)

Client sample ID

				S-1	S-1	S-2	S-2	S-1
Client sampling date / time				28-Jul-2020 09:45	28-Jul-2020 09:45	28-Jul-2020 09:25	28-Jul-2020 09:25	28-Jul-2020 09:45
Compound	CAS Number	LOR	Unit	ES2025861-001	ES2025861-002	ES2025861-003	ES2025861-004	ES2025861-005
				Result	Result	Result	Result	Result
<b>EP080/071: Total Petroleum Hydrocarbons - Continued</b>								
C6 - C9 Fraction	----	20	µg/L	----	<20	----	<20	----
C10 - C14 Fraction	----	50	µg/L	----	140	----	100	----
C15 - C28 Fraction	----	100	µg/L	----	960	----	610	----
C29 - C36 Fraction	----	50	µg/L	----	700	----	80	----
^ C10 - C36 Fraction (sum)	----	50	µg/L	----	1800	----	790	----
<b>EP080/071: Total Recoverable Hydrocarbons - NEPM 2013 Fractions</b>								
C6 - C10 Fraction	C6_C10	20	µg/L	----	<20	----	<20	----
^ C6 - C10 Fraction minus BTEX (F1)	C6_C10-BTEX	20	µg/L	----	<20	----	<20	----
>C10 - C16 Fraction	----	100	µg/L	----	210	----	180	----
>C16 - C34 Fraction	----	100	µg/L	----	1360	----	570	----
>C34 - C40 Fraction	----	100	µg/L	----	450	----	<100	----
^ >C10 - C40 Fraction (sum)	----	100	µg/L	----	2020	----	750	----
^ >C10 - C16 Fraction minus Naphthalene (F2)	----	100	µg/L	----	210	----	180	----
<b>EP080: BTEXN</b>								
Benzene	71-43-2	1	µg/L	----	<1	----	<1	----
Toluene	108-88-3	2	µg/L	----	<2	----	<2	----
Ethylbenzene	100-41-4	2	µg/L	----	<2	----	<2	----
meta- & para-Xylene	108-38-3 106-42-3	2	µg/L	----	<2	----	<2	----
ortho-Xylene	95-47-6	2	µg/L	----	<2	----	<2	----
^ Total Xylenes	----	2	µg/L	----	<2	----	<2	----
^ Sum of BTEX	----	1	µg/L	----	<1	----	<1	----
Naphthalene	91-20-3	5	µg/L	----	<5	----	<5	----
<b>EP074S: VOC Surrogates</b>								
1,2-Dichloroethane-D4	17060-07-0	5	%	----	104	----	99.5	----
Toluene-D8	2037-26-5	5	%	----	121	----	124	----
4-Bromofluorobenzene	460-00-4	5	%	----	109	----	111	----
<b>EP075(SIM)S: Phenolic Compound Surrogates</b>								
Phenol-d6	13127-88-3	1.0	%	----	22.2	----	23.9	----
2-Chlorophenol-D4	93951-73-6	1.0	%	----	40.6	----	52.2	----
2,4,6-Tribromophenol	118-79-6	1.0	%	----	36.8	----	50.6	----
<b>EP075(SIM)T: PAH Surrogates</b>								
2-Fluorobiphenyl	321-60-8	1.0	%	----	74.5	----	65.9	----



## Analytical Results

Sub-Matrix: **WATER**  
 (Matrix: **WATER**)

Client sample ID

				S-1	S-1	S-2	S-2	S-1
Client sampling date / time				28-Jul-2020 09:45	28-Jul-2020 09:45	28-Jul-2020 09:25	28-Jul-2020 09:25	28-Jul-2020 09:45
Compound	CAS Number	LOR	Unit	ES2025861-001	ES2025861-002	ES2025861-003	ES2025861-004	ES2025861-005
				Result	Result	Result	Result	Result
<b>EP075(SIM)T: PAH Surrogates - Continued</b>								
<b>Anthracene-d10</b>	1719-06-8	1.0	%	----	<b>69.9</b>	----	<b>67.2</b>	----
<b>4-Terphenyl-d14</b>	1718-51-0	1.0	%	----	<b>70.7</b>	----	<b>66.0</b>	----
<b>EP080S: TPH(V)/BTEX Surrogates</b>								
<b>1,2-Dichloroethane-D4</b>	17060-07-0	2	%	----	<b>110</b>	----	<b>105</b>	----
<b>Toluene-D8</b>	2037-26-5	2	%	----	<b>114</b>	----	<b>117</b>	----
<b>4-Bromofluorobenzene</b>	460-00-4	2	%	----	<b>104</b>	----	<b>109</b>	----



## Analytical Results

Sub-Matrix: <b>WATER</b> (Matrix: <b>WATER</b> )				Client sample ID	<b>S-2</b>	----	----	----	----
				Client sampling date / time	28-Jul-2020 09:25	----	----	----	----
Compound	CAS Number	LOR	Unit		<b>ES2025861-006</b>	-----	-----	-----	-----
				Result		----	----	----	----
<b>EA005P: pH by PC Titrator</b>									
pH Value	----	0.01	pH Unit		<b>7.35</b>	----	----	----	----
<b>EA010P: Conductivity by PC Titrator</b>									
Electrical Conductivity @ 25°C	----	1	µS/cm		<b>135</b>	----	----	----	----
<b>EA025: Total Suspended Solids dried at 104 ± 2°C</b>									
Suspended Solids (SS)	----	5	mg/L		<b>5</b>	----	----	----	----





## Surrogate Control Limits

Sub-Matrix: <b>WATER</b>		Recovery Limits (%)	
Compound	CAS Number	Low	High
<b>EP074S: VOC Surrogates</b>			
1,2-Dichloroethane-D4	17060-07-0	78	133
Toluene-D8	2037-26-5	79	129
4-Bromofluorobenzene	460-00-4	81	124
<b>EP075(SIM)S: Phenolic Compound Surrogates</b>			
Phenol-d6	13127-88-3	10	44
2-Chlorophenol-D4	93951-73-6	14	94
2,4,6-Tribromophenol	118-79-6	17	125
<b>EP075(SIM)T: PAH Surrogates</b>			
2-Fluorobiphenyl	321-60-8	20	104
Anthracene-d10	1719-06-8	27	113
4-Terphenyl-d14	1718-51-0	32	112
<b>EP080S: TPH(V)/BTEX Surrogates</b>			
1,2-Dichloroethane-D4	17060-07-0	71	137
Toluene-D8	2037-26-5	79	131
4-Bromofluorobenzene	460-00-4	70	128

Attachment 4: Consent to discharge Industrial Trade Wastewater

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# **Consent to discharge industrial trade wastewater**



**Consent to Discharge Industrial Trade Wastewater**

**SYDNEY WATER CORPORATION**

**and**

**ENVIRO WASTE SERVICES GROUP PTY LTD**

**A.C.N. 613 987 438**

**ACTIVITY: GREASE TRAP WASTE DISPOSAL (GE02)**

**RISK INDEX: 05**

**CONSENT NO: 36782**


**CONNECTION NO: 1**

**PROPERTY NUMBER: 4535938**

This **CONSENT** is made on  
Executed for and on behalf of  
Sydney Water Corporation

day: 20 month: 03 year: 2019

By

  
.....  
(Signature)  
Caleb Furner  
Manager Major Customers

In the presence of:

Witness

  
.....  
(Signature)

MATTHEW TRUMAN  
.....  
(Print name of witness)

Executed for and on behalf of  
the Customer:

  
.....  
(Signature)

By

EDWARD HAWKEY  
.....  
(Print name and position of person signing)  
who warrants s/he has sufficient authority to execute this consent.

In the presence of:

Witness

  
.....  
(Signature)

SIMON SABA  
.....  
(Print name of witness)

*This consent must be executed by the Customer prior to execution by Sydney Water and submitted by the Customer to Sydney Water for its consideration. Submission of a consent executed by the Customer under no circumstances obliges Sydney Water to enter into or complete the consent. Submission of an executed consent by the Customer constitutes an application for a consent which Sydney Water may in its reasonable discretion reject, or with the consent of the Customer modify any of the proposed terms thereto.*



## Consent to Discharge Industrial Trade Wastewater

### SCHEDULE 1

(SUBJECT TO PUBLIC DISCLOSURE)

#### TRADE WASTEWATER WHICH MAY BE DISCHARGED

##### 1. Trade wastewater substances

- (a) The Customer may discharge trade wastewater into the Sewer in a manner whereby the substance characteristics of the trade wastewater are of a type and discharged at a rate, level or concentration equal to or less than that described in this schedule.
- (b) The Customer must not discharge trade wastewater into the Sewer in a manner whereby the trade wastewater discharged;
- (i) contains, possesses or produces a substance characteristic not provided in, or which may be determined as being contrary to that described in this schedule.
- (ii) is at or of a rate, level, or concentration not provided in, or which may be determined as being contrary to, that described in this schedule.

SUBSTANCE	LTADM (kg/day)	MDM (kg/day)	Standard (mg/L)
AMMONIA (AS N)	5	10	100
BIOCHEMICAL OXYGEN DEMAND	75	150	
SUSPENDED SOLIDS	60	120	600
GREASE	11	22	110
SULPHATE	50	100	2000
COPPER	0.15	0.3	5
IRON	1.5	5	50
SULPHIDE	0.5	1	5
ZINC	0.5	1	5

#### RECONCILIATION PROCEDURES:

##### LONG TERM AVERAGE DAILY MASS:

The Long Term Average Daily Mass is a twelve month arithmetic average of ALL daily mass discharges as calculated for each composite sample. The Daily Mass discharged is to be calculated for each of the above substances, and checked against the above Long Term Average Daily Mass (kg/day) on the basis of average concentrations of substances discharged (mg/L) over any 24 hour period as determined from composite samples, obtained by either the Customer (in accordance with Schedule 2) or Sydney Water, or a combination of sample results by both.

This average concentration (mg/L) is to be multiplied by the total discharge (kL) as recorded by the Customer's discharge flow meter over the 24 hour period in order to calculate the Daily Mass of substances discharged (kg). Exceeding the Long Term Average Daily Mass does not constitute a Breach.

##### ACCEPTANCE STANDARD:

The Composite Sample Concentration is to be determined for each of the above substances, and checked against the above Acceptance Standard (mg/L) for each sample obtained. Exceeding the Acceptance Standard constitutes a Breach and will also incur an increased Quality Charge as detailed in Schedule 3.

The Discrete Sample Concentration is to be determined for each of the substances identified at Schedule 2, 2 (b) and checked against the above Acceptance Standard (mg/L) for each sample obtained. Exceeding the Acceptance Standard constitutes a Breach.

##### MAXIMUM DAILY MASS:

The Daily Mass discharged is to be calculated for each of the above substances, and checked against the above Maximum Daily Mass (kg/day) on the basis of average concentrations of substances discharged (mg/L) over any 24 hour period as determined from composite samples, obtained by either the Customer (in accordance with Schedule 2) or Sydney Water, or a combination of sample results by both.

This average concentration (mg/L) is to be multiplied by the total discharge (kL) as recorded by the Customer's discharge flow meter over the 24hour period in order to calculate the Daily Mass of substances discharged (kg). Exceeding the Maximum Daily Mass constitutes a Breach.

## Consent to Discharge Industrial Trade Wastewater

### 2. The trade wastewater discharged must at all times have the following properties:

- |                                  |   |
|----------------------------------|---|
| Temperature                      | - Not to exceed 38 degrees Celsius.   |
| Colour                           | - Determined on a system specific basis   |
| pH                               | - Within the range 7.0 to 10.0.   |
| Fibrous material                 | - None which could cause an obstruction to Sydney Water's sewerage system.  |
| Gross solids (other than faecal) | - A maximum linear dimension of less than 20 mm, a maximum cross section dimension of 6 mm, and a quiescent settling velocity of less than 3 m/h.   |
| Flammability                     | - Where flammable and/or explosive substances may be present, the Customer must demonstrate to the satisfaction of Sydney Water that there is no possibility of explosions or fires occurring in the sewerage system. The flammability of the discharge must never exceed 5% of the Lower Explosive Limit (LEL) at 25° Celsius. |

### 3. Rate of discharge of waste to sewer:

- (a) Instantaneous maximum rate of gravitated discharge 6 litres per second
- (b) Maximum daily discharge 200 kilolitres
- (c) Average daily discharge 100 kilolitres

### RECONCILIATION PROCEDURE:

The data obtained from applying these procedures is to be checked by the interface of a chart recorder to the Customer's flow metering equipment, or by the installation of flow metering equipment by Sydney Water, for a minimum of 7 days.

# Consent to Discharge Industrial Trade Wastewater

## SCHEDULE 2

(SUBJECT TO PUBLIC DISCLOSURE)

### SAMPLING, ANALYSIS, FLOW RATES AND VOLUME DETERMINATION

1. The Customer must provide and make available for the purpose of sampling and analysis;
  - (a) Sampling point located at pre-treatment discharge excluding domestic sewage prior to the point of connection to the Sewer.
  - (b) Equipment necessary to allow collection of composite automatic samples on either a flow proportional or a time basis.
2. The Customer is to undertake collection and analysis of samples in accordance with the schedule detailed below:
  - (a) Composite samples are to be obtained:
    - (i) over one full production day by combining equal volumes taken at 5 kilolitre intervals. The volumes are to be such that at least 5,000 millilitres are obtained over the full day. The reading of the Flowmeter meter is to be obtained at the commencement and conclusion of the sampling day.
    - (ii) on 18 March 2019 and every 22 days thereafter. If trade wastewater is not discharged on this day, then the sample is to be taken on the next day that trade wastewater is discharged. Trade wastewater includes all non-domestic wastewater discharged to sewer from the premises, including cleaning waste.
  - (b) Discrete samples are to be obtained as detailed below, and analysed according to the procedures and methods specified in Sydney Water's published analytical methods, to determine the concentrations or levels of the following substance characteristics:

pH	at the start and finish of each sample day
AMMONIA (AS N)	at the finish of each sample day
  - (c) Composite samples are to be analysed according to the procedures and methods specified in Sydney Water's published analytical methods, or methods otherwise agreed to and detailed hereunder, to determine the concentrations or levels of the following substance characteristics:

AMMONIA (AS N)
BIOCHEMICAL OXYGEN DEMAND
SUSPENDED SOLIDS
GREASE
SULPHATE
COPPER
IRON
SULPHIDE
ZINC
  - (d) The Customer, or the laboratory contracted by the customer, is to submit results of analyses to Sydney Water within 21 days from the date the sample was taken. All analysis results are to be submitted on the sample analysis report provided as appendices 1 and 2 to this Consent or in such format as may be specified from time to time by Sydney Water.
  - (e) All data requested on the sample analysis report must be provided.
  - (f) Sydney Water must be notified in writing within 7 days of;
    - (i) any failure to obtain samples in accordance with the provisions of Schedule 2; or
    - (ii) any loss of any analytical data.

Where data is unavailable, lost or not provided, the Quality Charge, as detailed in Schedule 3, will be assessed on the basis of the highest Composite Sample concentration recorded in the 12 months prior to the date of the missing sample data.



### **Consent to Discharge Industrial Trade Wastewater**

3. The volume of wastewater discharged must be obtained from the reading of the total flow on the Customer's flowmetering system.

The rate of waste discharged is to be obtained by the reading of the instantaneous flow rate indicator on the Customer's flowmetering system, or from any chart recorder interfaced to the Customer's flowmetering system.

The flowmetering system is to be calibrated at least annually at the Customer's expense, by a person or company approved by Sydney Water and a copy of the calibration certificate supplied to Sydney Water within one month of such certificate being received by the Customer.

If the Customer's flowmetering system fails to record data for any period, Sydney Water is to be advised in writing by the Customer within 7 days of any such failure becoming known by the Customer. An estimate of any data not recorded is to be made as follows:

Average of the waste discharged, registered for the four weeks before and/or after the failure to record.

# Consent to Discharge Industrial Trade Wastewater

## SCHEDULE 3

(SUBJECT TO PUBLIC DISCLOSURE)

### PAYMENTS

The charges are effective from 1 March 2019 and will continue until otherwise advised by Sydney Water.

All trade waste fees and charges are subject to CPI adjustments from 1 July each year in accordance with Determination No 1, 2012 made by the Independent Pricing and Regulatory Tribunal (IPART) and are detailed in fact sheets on the Sydney Water website.

#### 1. CHARGES FOR TRADE WASTEWATER DISCHARGE

Sydney Water will conduct a reading of the Customer's discharge meter at approximately 90 day intervals. The volume of trade wastewater discharged for the period since the previous reading will be calculated.

Charges are based on the Daily Mass calculated from composite samples and corresponding meter readings for each sampling day in the billing period, and calculated in accord with (c), (d), (e), and (f) below. The charge for each sampling day is then multiplied by a flow weighting factor to give a flow weighted charge. The total charge for each substance for the billing period is equal to the sum of the flow weighted charges for the billing period.

Total Charge = the sum of the flow weighted charges for the billing period

Flow Weighted Charge = (charge for all sample days) x (flow weighting factor) and:

$$\text{Flow Weighting Factor} = \frac{(\text{total volume discharged during billing period})}{(\text{sum of volumes discharged during all sample days during billing period})}$$

In this formula volume discharged refers to the volume of trade wastewater discharged.

##### (a) Mass Discharged:

For each substance, the Mass Discharged is calculated by multiplying the Composite Sample concentration by the Trade Wastewater discharge for that sample day.

##### (b) Chargeable Trade Waste Mass:

- (i) For the following substances, the Chargeable Trade Waste Mass is equal to the Mass Discharged:

#### SUBSTANCE

COPPER

IRON

SULPHIDE

ZINC

- (ii) For the following substances, the Chargeable Trade Waste Mass is calculated by subtracting the Equivalent Domestic Mass from the Mass Discharged. The Equivalent Domestic Mass is defined as the Domestic Concentration multiplied by the Trade Wastewater discharge.

SUBSTANCE	DOMESTIC CONCENTRATION mg/L
AMMONIA (AS N)	35
BIOCHEMICAL OXYGEN DEMAND	230
SUSPENDED SOLIDS	200
GREASE	50
SULPHATE	50

If the resulting Chargeable Trade Waste Mass is zero or negative, then no Quality charges will apply for that substance for that sample day.

## Consent to Discharge Industrial Trade Wastewater

### (c) Quality Charge:

- (i) For the following substances, the Quality Charge is determined by multiplying the Chargeable Trade Waste Mass by the Rate for that substance as detailed in the Industrial Customers Acceptance Standards and charging rates for the applicable financial year fact sheet on the Sydney Water website.

#### SUBSTANCE

AMMONIA (AS N)  
SUSPENDED SOLIDS  
GREASE  
COPPER  
IRON  
SULPHIDE  
ZINC

- (ii) For the following substances, the Quality Charge is determined by multiplying the Chargeable Trade Waste Mass by the Rate, where the Rate is a function of the composite sample concentration recorded for that sample day.

#### SUBSTANCE

BIOCHEMICAL OXYGEN DEMAND

### (d) Concentration Breach Charge:

Where the Composite Sample concentration is greater than the Acceptance Standards specified in Schedule 1 (with the exception of sulphate), any charges calculated in (c) above will be doubled for that sampling day.

### (e) Failure to collect required samples:

Where the Customer fails to collect and analyse samples in accord with this consent the above charges will be assessed on the basis of the highest composite concentrations recorded for any billing period within the previous 12 months and the average daily discharge for the current billing period.

### (f) pH and Temperature charges:

Sydney Water regularly assesses its wastewater networks to determine if a system is affected by accelerated odour and corrosion. Where Sydney Water declares a wastewater system to be affected by accelerated odour and corrosion, the temperature and pH charge will only apply if the customer is not committed to or not complying with an effluent improvement program.

## 2. CHARGES FOR INSPECTIONS

- (a) If, in the opinion of Sydney Water, it is necessary for a Business Customer Representative to exercise rights under clause 6.1, the Customer will incur no liability for payment for any such exercise unless the Business Customer Representative has already exercised rights under clause 6.1 on 4 occasions within a period of one year.
- (b) If it is necessary, in the opinion of Sydney Water, to carry out more than 4 occasions within a period of one year, the additional inspections will be charged at the current inspection rate.
- (c) Any inspection required following up an alleged breach or a default notice will result in a fee payable even if the number of inspections nominated in paragraph 2 (a) has not been exceeded.
- (d) For the purposes of 2 (a) and 2 (b), above, one year is defined as the period from 1 July to 30 June the following year.

## **Consent to Discharge Industrial Trade Wastewater**

### **3. CHARGES FOR ADMINISTRATION OF TRADE WASTE CONSENT**

A consent fee per quarter is payable from 1 March 2019.

### **4. CHARGES FOR VARIATION OR RENEWAL OF TRADE WASTE CONSENT**

Where a Variation is made to the Consent a fee will be payable. There will be no charge for renewal.

### **5. CHARGES FOR GREASE TRAPS**

Wastesafe administration charges are levied per pit per year.

### **6. PAYMENT OF FEES AND CHARGES**

An account will be issued for all fees and charges. Any fees or charges payable by the Customer must be paid by the Customer within 30 days of the receipt by the Customer of the account detailing those fees and charges.

# **Consent to Discharge Industrial Trade Wastewater**

## **SCHEDULE 4 ADDITIONAL REQUIREMENTS**

### **1. EFFLUENT IMPROVEMENT PROGRAM**

N/A

### **2. WASTE MANAGEMENT PLAN**

The existing pre-treatment will result in the generation of 26 tonne per annum of waste substances in the form of a sludge containing generally solids. The waste substances are, and will continue to be disposed of, in compliance with the requirements of The Environment Protection Authority.

### **3. OTHER REQUIREMENTS**

- (a) A Backflow Containment Device must be installed and maintained at the water meter outlet/property boundary in line with Sydney Water's Responsibilities Of Connected Customers Policy.
- (b) Backflow individual/zone protection is required on any tap located within 5m of the trade waste apparatus.



## Consent to Discharge Industrial Trade Wastewater

### SCHEDULE 5 APPARATUS, PLANT AND EQUIPMENT

**EXISTING:** 1 X 7,500L screening tank  
5 X 20,000L settling tank  
1 X SEPA DAF 5 kL/hr  
1 X pH correction & control system  
1 X Siemens Magflow 5000  
1 X sample point  
2 X charcoal filters for air scrubbing

**PROPOSED:** N/A

# Consent to Discharge Industrial Trade Wastewater

## SCHEDULE 6 SPECIAL CONDITIONS

### 1. DANGEROUS DISCHARGES

In this Schedule, the term "may pose a danger to the environment, the Sewer or workers at a sewage treatment plant";

- (a) means an occurrence whereby matter is discharged to the Sewer which either alone or in conjunction with other matter discharged cannot be adequately treated or may cause corrosion or a blockage, explosion or the production of dangerous gases in the Sewer or may adversely affect the operation of a sewer or sewage treatment plant; and
- (b) includes, but not so as to restrict the generality of paragraph (a), matter or substances, which is or are;
  - (i) toxic or corrosive;
  - (ii) petroleum hydrocarbons;
  - (iii) heavy metals;
  - (iv) volatile solvents;
  - (v) phenolic compounds;
  - (vi) organic compounds.

### 2. UNINTENDED DISCHARGES

- (a) For purposes of avoiding unintended discharges to the Sewer or the stormwater drainage system, all matter and substances on the Premises must be processed, handled, moved and stored in a proper and efficient manner.
- (b) Any substance on the Premises which, if discharged to the Sewer, may pose a danger to the environment, the Sewer or workers at a sewage treatment plant or may harm any sewage treatment process must be handled, moved and stored in areas where leaks, spillages or overflows cannot drain by gravity or by automated or other mechanical means to the Sewer or the stormwater drainage system

### 3. NOTIFICATION

In the event of a discharge of matter to the sewer that poses or may pose a danger to the environment, the Sewer or workers at a sewage treatment plant the Customer must immediately notify:

- (a) MALABAR STP CONTROL ROOM TEL: (02) 9931 8319 FAX: (02) 9931 8366
- (b) BUSINESS CUSTOMER SERVICES (8AM TO 5PM MON TO FRI) TEL: 1300 985 227
- (c) BUSINESS CUSTOMER SERVICES EMERGENCY CONTACT (24 HOURS) TEL: (02) 8849 5029

### 4. PROVISION OF SAFE ACCESS

The Customer shall provide safe access to Sydney Water employees visiting the site. In the event that unsafe conditions are identified the Customer must take reasonable steps to correct unsafe conditions and create safe access.

Sydney Water employees must also comply with the Customer's safety policies and procedures and any directions from the Customer's staff while on the Customer's site.

### 5. ELECTRONIC REPORTING OF SAMPLE ANALYSIS RESULTS

Sydney Water reserves the right to vary this consent to specify the option of reporting by electronic mail as outlined in Schedule 2, 2 (d).

## **Consent to Discharge Industrial Trade Wastewater**

### **SCHEDULE 7**

1. Premises for which Consent is granted  
14 KIORA CRES, YENNORA NSW 2161
2. Industrial or other commercial activities for which Consent is granted  
GREASE TRAP WASTE DISPOSAL (GE02)
3. Discharge point for which Consent is granted  
JUNCTION IN KIORA CRES
4. The date for purposes of clause 3.1 is 1 March 2019
5. The period for purposes of clause 3.2 is 24 months
6. The receiving Treatment Plant is MALABAR Wastewater Treatment Plant / Water Recycling Plant



## Consent to Discharge Industrial Trade Wastewater

### SCHEDULE 8

#### NOTICES AND COMMUNICATION ADDRESSES

<b>SYDNEY WATER</b>	MANAGER MAJOR CUSTOMERS PO Box 399 PARRAMATTA 2150	TEL: 1300 985 227 A.H: (02) 8849 5029
<b>CUSTOMER:</b>	EDWARD HAWACH DIRECTOR ENVIRO WASTE SERVICE GROUP PO BOX 706 PARRAMATTA NSW 2124	TEL: (02) 9721 2028 FAX: (02) 9721 1963

### SCHEDULE 9

#### AUTHORISED OFFICERS

<b>SYDNEY WATER:</b>	MANAGER MAJOR CUSTOMERS PO Box 399 PARRAMATTA 2150	TEL: 1300 985 227 A.H: (02) 8849 5029
----------------------	--	--

Email: [businesscustomers@sydneywater.com.au](mailto:businesscustomers@sydneywater.com.au)

<b>CUSTOMER:</b>	EDWARD HAWACH DIRECTOR ENVIRO WASTE SERVICES GROUP 14 KIORA RD YENNORA NSW 2161	TEL: (02) 9721 2028 FAX: (02) 9721 1963
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Email: [info@enviroblasting.com.au](mailto:info@enviroblasting.com.au)

### SCHEDULE 10

#### NOMINATED REPRESENTATIVES

<b>SYDNEY WATER:</b>	MANAGER MAJOR CUSTOMERS PO Box 399 PARRAMATTA 2150	TEL: 1300 985 227 A.H: (02) 8849 5029
<b>CUSTOMER:</b>	EDWARD HAWACH DIRECTOR ENVIRO WASTE SERVICES GROUP 14 KIORA RD YENNORA NSW 2161	TEL: 0420 511 727 FAX: (02) 9687 8389

## Consent to Discharge Industrial Trade Wastewater

### APPENDIX 1 (Example)

#### SAMPLE ANALYSIS REPORT (COMPOSITE) DISCHARGE METER

Consent Number:	36782
Company Name:	ENVIRO WASTE SERVICES GROUP PTY LTD
Company Address:	14 KIORA CRES, YENNORA NSW 2161
Sample Type:	
<input type="checkbox"/> 6 (composite, manual time based)	Start date: ____/____/____
<input type="checkbox"/> 7 (composite, manual flow proportional)	Finish date: ____/____/____
<input type="checkbox"/> 8 (composite, automatic time based)	Start time: ____:____ am/pm
<input type="checkbox"/> 9 (composite, automatic flow proportional)	Finish time: ____:____ am/pm
grabs taken in sample period: _____	Initial meter reading: _____ kL
sample intervals min/kL: _____	Final Meter reading: _____ kL
mL per grab: _____	Volume discharged: _____ kL

Laboratory:		
Substance	Acceptance Standard (mg/L)	Measured Concentration(mg/L)
AMMONIA (AS N)	100	
BIOCHEMICAL OXYGEN DEMAND		
SUSPENDED SOLIDS	600	
GREASE	110	
SULPHATE	2000	
COPPER	5	
IRON	50	
SULPHIDE	5	
ZINC	5	

**COPY OF ORIGINAL ANALYTICAL LABORATORY REPORT TO BE ATTACHED**  
**NOTE: LABORATORY REPORT MUST CERTIFY NATA REGISTRATION FOR EACH ANALYSIS**

Comments: \_\_\_\_\_

Customer Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Designation: \_\_\_\_\_

#### OFFICE USE ONLY

Sample No: 

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EMAIL TO:  
matthew.truman@sydneywater.com.au

## Consent to Discharge Industrial Trade Wastewater

### APPENDIX 2 (Example)

#### SAMPLE ANALYSIS REPORT (DISCRETE SAMPLE)

Consent Number:	36782
Company Name:	ENVIRO WASTE SERVICES GROUP PTY LTD
Company Address:	14 KIORA CRES, YENNORA NSW 2161

Sample Type: DISCRETE	
Start Date: ____/____/____	Start time: ____:____ am/pm
Finish Date: ____/____/____	Finish Time: ____:____ am/pm

Laboratory:
-------------

Substance	Acceptance Standard (units or mg/L)	Measured Units or Concentration.
pH at start	7 - 10	
pH at finish	7 - 10	
Ammonia (As N)	100	

**COPY OF ORIGINAL ANALYTICAL LABORATORY REPORT TO BE ATTACHED**  
**NOTE: LABORATORY REPORT MUST CERTIFY NATA REGISTRATION FOR EACH**  
**ANALYSIS**

Comments: \_\_\_\_\_

Customer Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_  
Designation: \_\_\_\_\_

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Sample No: 

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EMAIL TO:  
matthew.truman@sydneywater.com.au



## GENERAL CONDITIONS

### Recitals:

- A. Under its Operating Licence, Sydney Water provides sewerage services and treats and disposes of trade wastewater. The objectives of Sydney Water include operating as an efficient business, maximising the net worth of the State's investment and exhibiting a sense of social responsibility by having regard to the interests of the community. Sydney Water has special objectives of reducing risks to human health and preventing degradation of the environment.
- B. Sydney Water is granted licences by the Environment Protection Authority, which are subject to conditions to discharge pollutants. A change to a licence condition may require that variations be made to a consent granted by Sydney Water.
- C. In the conduct of its business operations, Sydney Water must comply with its obligations, duties and responsibilities under the Act and its Operating Licence and the Protection of the Environment Administration Act 1991, the Protection of the Environment Operations Act 1997 and the Protection of the Environment Legislation Amendment Act 2011.
- D. The customer requests that Sydney Water grant consent to the customer for purposes of discharge of trade wastewater from the premises to the sewer.

**Sydney Water grants to the customer consent to discharge trade wastewater, subject to the terms and conditions specified in this consent. The customer accepts the consent and agrees to be bound by the terms and conditions of this consent:**

### 1. Definitions and interpretation

- 1.1 In this consent, unless the contrary intention appears;

**Acceptance standards** means Sydney Water's published concentration limits for certain substances in trade wastewater.

**Act** means the Sydney Water Act 1994.

**Business Customer Representative** means an officer of Sydney Water who is authorised to enter land or buildings for purposes of carrying out his or her duties in relation to Sydney Water's trade wastewater service.

**Consent** means this consent together with its attached schedules and appendices. Any definitions or standards referred to in this consent but not contained in it are deemed to form a part of this consent with necessary changes being made to accommodate their inclusion.

**Authorised officer** means:

- with respect to Sydney Water, the person from time to time holding the position pertained in schedule 9 or such other person or position as may be nominated by Sydney Water from time to time;
- with respect to the customer, the person identified, and includes the details specified, in schedule 9 or as may be notified to Sydney Water by the customer from time to time.

**Breach** means any contravention of or non-compliance with a term, condition or provision of this consent or the Act.

**Chargeable trade waste mass** means the mass of a pollutant subject to quality or critical substance charges.

**Composite sample** means a sample of trade wastewater obtained by combining equal volumes at either equal time or flow intervals.

**Critical mass charge** means the charge applied to some critical and over capacity substances as calculated in accordance with the provisions set out in schedule 3.

**Critical substance** means a substance determined to be critical and notified from time to time by Sydney Water.

**Customer** means the party or parties (except Sydney Water) who executes or execute this consent.

**Daily mass** means the mass of a substance discharged during a 24-hour period.

**Default notice** means a notice issued in accordance with clause 8.1.

**Domestic concentration** means the concentration of a pollutant deemed by Sydney Water to be equivalent to that found in domestic wastewater.

**Domestic wastewater** means water which has in it human faecal matter, urine or refuse of any type produced in, and which is permitted to be discharged to a Sydney Water sewer from, any premises used exclusively for residential purposes.

**Environment Protection Authority** means the statutory authority established under section 15 of the Protection of the Environment Administration Act 1991

**Equivalent domestic mass** means the mass of a substance that would be expected in the trade wastewater if it were at domestic concentration.

**Flow weighted charge** means the portion of a substance's charge for a billing period that is attributed to any sample collected in accordance with schedule 2 or, if such sample is required but is not collected, then fixed by Sydney Water in accordance with schedule 2.

**Flow weighting factor** means a factor used to determine charges as described in schedule 3.

**Long term average daily mass** means, for each pollutant, the figure listed in schedule 1 and used to determine critical mass charges as described in schedule 3.

**Lower explosive limit** means the minimum concentration of flammable and/or explosive substances that would result in a fire or explosion.

**Mass discharged** means the mass of a pollutant discharged on a sample day and is measured by

## GENERAL CONDITIONS

multiplying the composite sample concentration by the trade wastewater discharge for that sample day.

**Maximum daily mass** means the greatest mass of a substance permitted for discharge within a 24-hour period.

**Over capacity** means the status of a substance as determined in accordance with Sydney Water's Trade Waste Policy, 2007.

**Over capacity substance** means a substance determined to be over capacity and notified from time to time by Sydney Water.

**Premises** means the land, plant and buildings described and specified in paragraph 1 of schedule 7, on or in which the customer carries on industrial or other commercial activities specified in paragraph 2 of schedule 7.

**Quality charge** means a pollutant charge applied to trade waste discharges based on the mass of each pollutant discharged to sewer.

**Regulator** means any statutory authority, which may grant permission, authority or licence to Sydney Water to operate the sewer or treat or dispose of sewage treatment by-products.

**Residual products** means biosolids, re-use water or such other product intended for re-use as may be developed by Sydney Water from time to time.

**Risk index** means a ranking applied to the consent by Sydney Water to describe the relative risk of accepting the trade wastewater. Determination of the risk index will be based on the methodology determined from time to time by Sydney Water, or as may be necessary in the opinion of Sydney Water to take into account particular circumstances. The risk index is used to determine, among other things, the amount of self-monitoring required, the number of inspections to be performed by Sydney Water, the annual consent fee and the term of the consent.

**Sewer** means the sewerage service of Sydney Water, including the sewage treatment plant, discharge to which is facilitated by a discharge point situated on the premises and specified in item 3 of schedule 7.

**Significant breach** means any breach of a nature outlined at clause 15.2. Such breaches may result in immediate suspension or termination of the consent.

**Standard mass charging rate** means the charge per kilogram for substances as defined in schedule 3.

**Sydney Water** means Sydney Water Corporation.

**Responsibilities of connected customers policy** means Sydney Water's policy detailing the conditions under which Sydney Water will agree to accept trade wastewater to sewer.

**Trade wastewater** means any liquid and any substance in it that is produced in an industrial or commercial activity at the premises and discharged into the sewer, but does not include domestic wastewater.

**Trade waste residue** means any substance separated and retained, from trade wastewater being discharged into the sewer.

1.2 In this consent, unless the contrary intention appears:

- (a) A reference to an Act or any delegated legislation or instrument made under an Act includes any other Act delegated legislation or instrument as may amend or replace any of them.
- (b) A reference to a word or expression
  - (i) in the singular form includes a reference to the word or expression in the plural form; and
  - (ii) in the plural form includes a reference to the word or expression in the singular form.
- (c) A reference to a party or a natural person includes a reference to a corporation.
- (d) A word or expression that indicates one or more particular genders is taken to indicate every other gender.
- (e) Headings to clauses and paragraphs are included in this consent to assist understanding of its terms and conditions but are not intended to affect the meaning or application of any term or condition.
- (f) A reference to a clause, schedule or appendix is a reference to a clause of or schedule or appendix to this consent and any such schedule or appendix is a part of this consent.

1.3 Remedies available to the parties under this consent;

- (a) are cumulative; and
- (b) do not prejudice or affect any other remedy available to the parties.

1.4 No rule of construction applies to the disadvantage of a party because that party was responsible for the preparation of this consent or any part of it.

## 2. Application of certain statutes and laws

2.1 This consent is made under and is subject to the provisions of the Act.

2.2 This consent is governed by and will be performed according to the law applicable in the State of New South Wales.

2.3 Subject to the terms and conditions of this consent the customer has lawful authority to dispose of trade wastewater for purposes of;

- (i) Section 115 of the Protection of the Environment Operations Act 1997; and
- (ii) Section 49 of the Act; and

## 3. Commencement and term of consent

3.1 This consent commences on the date specified in paragraph 4 of schedule 7.

3.2 This consent will, unless terminated or renewed in accordance with this consent, continue for the period specified in item 5 of schedule 7.



## GENERAL CONDITIONS

### 4. Discharge of trade wastewater into sewer

- 4.1 The customer may discharge trade wastewater from the premises into the sewer in accordance with the provisions of schedule 1 and schedule 4.
- 4.2 The customer must not discharge trade wastewater from the premises into the sewer contrary to the provisions of schedule 1 and schedule 4.
- 4.3 The customer indemnifies Sydney Water against all damages, losses, costs or expenses suffered or incurred by Sydney Water, caused by any unauthorised discharge from the premises in respect of:
- (a) injury (including death) or harm to any person; or
  - (b) damage to property vested in Sydney Water; or
  - (c) contamination of residual products; or
  - (d) material harm to any sewage treatment process
- provided that the said damages, losses, costs or expenses suffered or incurred by Sydney Water are caused by any unauthorised discharge of trade wastewater or other matter into the sewer by the customer which is in breach of this consent or by any other person from the customer's premises, except to the extent to which the damages, losses, costs or expenses (as the case may be) were caused by either the negligent or wilful act or omission of Sydney Water or a breach of this consent by Sydney Water.
- 4.4 The customer must take all precautions reasonably practicable to ensure that no person, other than a person acting for or on behalf of or with the consent of the customer, discharges any matter from the premises into the sewer.
- 4.5 For purposes of this consent, every discharge of matter from the premises into the sewer will be taken to have been a discharge by a person acting for or on behalf of, or with the consent of, the customer.

### 5. Charges

- 5.1 The customer must pay Sydney Water charges with respect to trade wastewater discharged to the sewer, the administration of this consent and, when applicable, the processing of grease trap waste determined in accordance with, and within the time and in the manner specified in schedule 3.
- 5.2 Sydney Water may vary the basis of charges or the charging rates in schedule 3;
- (a) as and when determined by the Independent Pricing and Regulatory Tribunal of New South Wales (IPART); or
  - (b) by written consent with the customer.

### 6. Inspections

- 6.1 A Business Customer Representative may enter the premises at any time;
- (a) for purposes of inspecting whether the activities of the customer are being conducted in accordance with this consent; or

- (b) for the purposes described in Section 38 of the Act or exercising any right or function conferred on Sydney Water under this consent.

This clause does not limit Sydney Water's statutory powers of entry.

- 6.2 When exercising rights under clause 6.1;

- (a) a Business Customer Representative must not cause any delay or inconvenience to the efficient conduct of business activities by the customer which could be reasonably avoided; and
- (b) except for any relevant safety precautions, a Business Customer Representative must not be impeded or delayed by any person on the premises.

- 6.3 If, in the opinion of Sydney Water, it is necessary for a Business Customer Representative to exercise rights under clause 6.1, the customer will make payment in accordance with the provisions of schedule 3.

### 7. Inquiries

- 7.1 Sydney Water may convene and determine the terms of reference of a joint inquiry about the circumstances relating to an incident that may have caused a breach.
- 7.2 An inquiry under clause 7.1 is to be conducted informally and without legal representation for purposes of gathering information about an incident directly from any person who may be expected to know, from his or her own observations, about the circumstances relating to the incident.
- 7.3 An inquiry under clause 7.1 may be conducted irrespective of whether the incident, the subject of the inquiry, is also the subject of a default notice.
- 7.4 Before conducting an inquiry under clause 7.1, the customer and Sydney Water may agree about what action, if any (except any action pursuant to a statutory obligation), may be taken with respect to any information that may be gathered during the inquiry.

### 8. Default procedures

- 8.1 If, in the opinion of Sydney Water, the customer commits, causes or allows a breach to occur, Sydney Water may issue to the customer a default notice.
- 8.2 A default notice must;
- (a) provide any relevant particular of the breach alleged by Sydney Water, including any particular known to Sydney Water that may assist the customer to ascertain the alleged breach; and
  - (b) specify that the customer must provide a response in writing to Sydney Water within seven days of receipt of the notice.
- 8.3 A default notice is not invalid merely because it does not provide a particular that may assist the customer to ascertain the alleged breach.
- 8.4 Any supply to the customer by Sydney Water of particulars under clause 8.7(a) is taken, for purposes of clause 8.5, to be a default notice under clause 8.1.

## GENERAL CONDITIONS

- 8.5 The customer must supply to Sydney Water a written response to a default notice within seven days of receipt of the default notice which must;
- (a) request further particulars of the alleged breach; or
  - (b) describe or explain the circumstances causing;
    - (i) the event which appeared to Sydney Water to be a breach; or
    - (ii) the breach to occur; and
  - (c) describe any action taken with respect to the alleged breach; and
  - (d) provide a plan of action to be taken by the customer to avoid the occurrence of any incident similar to the alleged breach; or
  - (e) explain the reasons of the customer for disputing the alleged breach.

8.6 The customer may make one request only for particulars under clause 8.5(a) with respect to a default notice.

- 8.7 When the customer responds in writing to Sydney Water in accordance with clause 8.5, Sydney Water must within seven days of receipt of that response either;
- (a) with respect to clause 8.5(a), provide in writing to the customer any further particulars that it may be able to provide in which case the customer shall be allowed a further seven days from receipt of those particulars to respond as required by clause 8.5(b)
  - (b) specify to what extent it accepts, rejects or disagrees with the response under 8.5(b) and provide details of any action it proposes to take (including any special requirements it may impose) to deal with the breach.

8.8 The issue by Sydney Water of a default notice is without prejudice to any right or power Sydney Water may have pursuant to this consent or conferred on it by statute or statutory rule.

### 9. Improvement program

- 9.1 The customer must, at its own expense, establish and carry out the improvement program specified in, and in accordance with the provisions of, schedule 4.
- 9.2 If, prior to any failure to comply, the customer notifies Sydney Water that it may not be able to comply with any obligation under clause 9.1, Sydney Water will consider any reasonable proposal of the customer to vary a term or condition of the improvement program.

### 10. Diligence program

- 10.1 Within six months of the making of this consent, the customer must give a notice to Sydney Water specifying a current diligence program.
- 10.2 For purposes of clause 10.1, a diligence program includes a plan, whereby the customer demonstrates that the management of the customer is exercising reasonable care in planning and taking appropriate action, to prevent or minimise the effects of any incident that may constitute a breach.

### 11. Suspension or termination of consent to discharge trade wastewater

- 11.1 Sydney Water may suspend the consent granted in clause 4.1 if;
- (a) the customer does not comply with clause 8.5, 9.1, 12.1, 12.2 or notice of the suspension is given to the customer; or
  - (b) Sydney Water is for any reason specified in clause 11.2 unable to accept for treatment trade wastewater that may be discharged by the customer.
- 11.2 Sydney Water may, by a notice given to the customer, suspend the consent granted in clause 4.1 if, in the reasonable opinion of Sydney Water;
- (a) an emergency prevents the sewer from accepting any or certain specified categories of trade wastewater that may be discharged by the customer; or
  - (b) an event has occurred, which could have an adverse effect on any employee or agent of or contractor to Sydney Water or the sewer, including any biological process.

whether the emergency or event is caused by fire, storm, tempest, flood, malicious damage, act of war, civil disobedience, explosion, earthquake or an act or omission of an employee, or agent of, or contractor to Sydney Water, or an unlawful discharge of matter into the sewer, or some other cause.

- 11.3 The period of any notice of suspension given under clause 11.2 will be no shorter than any period, which in the opinion of Sydney Water the circumstances dictate.
- 11.4 The customer must comply with any notice under clause 11.1 or 11.2 subject only to any delay that may be required to safeguard the health or life of any person.
- 11.5 Any suspension under clause 11.1 or 11.2 must not be for a period longer than, in the opinion of Sydney Water, the circumstances dictate.
- 11.6 If the customer does not cease discharging trade wastewater in accordance with a notice given under clause 11.1 or 11.2 and Sydney Water is of the opinion that the customer is not taking appropriate measures to stop the discharge, a Business Customer Representative may, with such other persons as he or she may think necessary, enter the premises and take such measures as he or she may think necessary to stop the discharge.
- 11.7 A suspension under clause 11.1 or 11.2 or any action that may be taken in accordance with clause 11.6 does not give rise to any remedy to the customer against Sydney Water for, or in respect of, the suspension or action.
- 11.8 Any costs incurred by Sydney Water with regard to taking action under clause 11.6 is a debt payable to



## GENERAL CONDITIONS

Sydney Water by the customer on demand made by Sydney Water.

- 11.9 Sydney Water may suspend the consent granted in clause 4.1 if; the discharge of trade wastewater by the customer in accordance with the consent granted under clause 4.1, by itself or in conjunction with the discharges of other persons is likely, in the opinion of Sydney Water, to cause Sydney Water to contravene any legislation, permission, authority or licence granted by a regulator, or any other regulatory authority.
- 11.10 Any suspension under clause 11.9 must be terminated as soon as Sydney Water is reasonably satisfied that the conditions giving rise to the suspension no longer exist.
- 11.11 If the customer and Sydney Water cannot agree in accordance with clause 11.10, they will initiate and attend discussions with the regulator to resolve any relevant matter.
- 11.12 If, after discussions under clause 11.11 the customer and Sydney Water fail to agree in accordance with clause 11.10, the consent granted in clause 4.1 may be terminated by Sydney Water.
- 11.13 Without limitation of the effect of any other clause in this consent, Sydney Water may terminate or suspend the customer's permission to discharge trade wastewater immediately by written notice to the customer, if in the opinion of Sydney Water the customer's discharge of trade wastewater is in breach of this consent and is likely to cause;
- (a) Sydney Water's contravention of the condition of any licence issued to it by the EPA; or
  - (b) the failure to meet a product specification of any of Sydney Water's residual products.
  - (c) Sydney Water to breach or fail to comply with any legislation.
- 11.14 A suspension under clause 11.9 or 11.13 in accordance with the terms of this consent or a termination under clause 11.12 or 11.13 in accordance with the terms of this consent does not give rise to any remedy to the customer against Sydney Water for or in respect of the suspension or termination.
- 11.15 Without limitation of the effect on any other clause in this consent, Sydney Water may terminate or suspend the customer's consent to discharge trade wastewater immediately by written notice served on the customer in accordance with Section 100 of the Act, on the occurrence of any one of the following events;
- (a) The customer fails to pay to Sydney Water any amount due and payable under this consent within twenty-one days of the due date for payment and such payment is not made within fourteen days of a written request from Sydney Water to do so.

- (b) The customer is in breach of the consent and is unable or unwilling to remedy the breach of consent as required by Sydney Water.

The customer acknowledges and agrees that if, following the termination of the consent, it continues to discharge trade wastewater into the sewer, a Business Customer Representative may enter the customer's premises and take all reasonable necessary steps to stop the customer's continued discharge of trade wastewater to the sewer. The right of entry conferred by this clause is in addition to, and not in substitution for, any power of entry conferred on Sydney Water by the Act.

### 12. Supply of information

- 12.1 Any information supplied by the customer to Sydney Water for purposes of making this consent or for any purpose of this consent must as far as reasonably possible be a true and complete disclosure by the customer for purposes of enabling Sydney Water to;
- (a) determine whether to grant the consent in clause 4.1; and
  - (b) determine whether there has been any breach of this consent.
- 12.2 The customer must not, in or in connection with a document supplied to Sydney Water for purposes of making this consent or for any purpose of this consent, furnish information, which is false or misleading in a material particular with regard to the trade wastewater to be discharged to the sewer.
- 12.3 Sydney Water must not disclose any confidential information obtained in connection with the administration or execution of this consent, unless that disclosure is made;
- (a) with the consent in writing of the customer
  - (b) with other lawful excuse.

### 13. Sampling

- 13.1 For purposes of this consent, schedule 2 specifies sampling and analysis criteria, flow rates and volume determinations of trade wastewater to be discharged or discharged under clause 4.1.
- 13.2 A Business Customer Representative may take as many samples of trade wastewater at any point in any production process or storage facility, or at any other point on the premises, as he or she thinks fit.
- 13.3 The customer must comply with the provisions of schedule 2.

### 14. Apparatus, plant and equipment for recording or treating trade wastewater

- 14.1 The customer must, at its own cost, provide, operate and maintain in an effective and efficient working order, the apparatus, plant and equipment described in schedule 5 for purposes of regulating, treating, determining and measuring the quality, quantity and



## GENERAL CONDITIONS

rate of discharge of trade wastewater under clause 4.1.

- 14.2 Sydney Water may require the customer to use its discretion to formulate and take such additional actions as may be appropriate to achieve the objects which, in the opinion of Sydney Water, are necessary for the customer to regulate, treat, determine or measure trade wastewater for purposes of discharge under clause 4.1.
  - 14.3 The customer must, at its own costs, maintain records in such manner as may be required by Sydney Water, of all measurements, sampling and results obtained in the course of treatment and discharge of trade wastewater under clause 4.1.
  - 14.4 The customer must submit to Sydney Water documents containing records of results specified in schedule 2.
  - 14.5 The customer must maintain records of particulars and dates of cleaning and maintaining all apparatus, plant and equipment described in schedule 5 and particulars, dates and method of disposal of trade waste residue from such apparatus, plant and equipment.
  - 14.6 The customer acknowledges that Sydney Water does not approve or warrant that any apparatus, plant or equipment used by the customer is sufficient for purposes of processing or treating trade wastewater for discharge under clause 4.1.
- 15. Variation and renewal of consent**
- 15.1 Before varying, substituting or adding any process conducted or to be conducted on the premises that may cause the volume, rate or quality of wastewater discharged to change from that agreed under schedule 1 and schedule 4, the customer shall give Sydney Water not less than 14 days written notice of its intention. Any variation, substitution or addition shall only be conducted after receipt of written approval to same and subject to any conditions (including any requirement to vary the terms of this consent) that Sydney Water may impose.
  - 15.2 Sydney Water may vary the terms of this consent where:
    - (a) Sydney Water alleges a single significant breach or three breaches of the same nature, to have occurred in a six month period; or
    - (b) in the opinion of Sydney Water, a substantial or material part of any plan of action under clause 8.5(d) may not be completed for a period exceeding 90 days; or
    - (c) the customer gives Sydney Water notice under clause 15.1.

For the purposes of this clause and without limitation, the following circumstances shall be regarded as being a single significant breach:

- (i) an activity or event that could adversely affect; the health and safety of any employee, agent or

contractor to Sydney Water, the integrity of Sydney Water assets or the viability of any of Sydney Water's treatment processes or products; or

- (ii) failure to achieve effluent improvement program milestone; or
  - (iii) failure to install pre-treatment; or
  - (iv) by-pass pre-treatment and/or installation of equipment that facilitates by-pass of pre-treatment; or
  - (v) flow-meter turned off or bypassed.
- 15.3 A renewal of this consent may be initiated by the customer:
    - (a) not less than two months before the date of expiration of this consent, and
    - (b) not more than six months before the date of expiration of this consent.
  - 15.4 If this consent remains current immediately prior to the expiration of the term detailed in 3.2, or any subsequent terms renewed in accordance with this clause, and:
    - (a) the customer has not given notice in accordance with clause 20.1 of this consent and;
    - (b) Sydney Water has not given to the customer at least 30 days' notice prior to the expiration of this consent, of its intention to permit the consent to expire in accordance with clause 3.2

Then this consent shall be deemed to be renewed immediately following its expiration, for a further period of six months.

- 15.5 Any amended schedules that Sydney Water prepares in response to a variation or renewal will be taken to be incorporated into this consent;
  - (a) on execution by the customer; or
  - (b) after 14 days of receipt by the customer of the notice of the variation or renewal.
- 15.6 The notification of alterations to the critical status of any pollutants does not constitute a variation.

### **16. Disposal of trade waste residue**

The customer must not dispose of any trade waste residue, except in accordance with the requirements of the EPA.

### **17. Disposal of grease trap wastes**

The customer must not dispose of grease trap wastes other than in accordance with Sydney Water's 'Wastesafe' Management System.

### **18. This consent comprises all applicable terms and conditions**

- 18.1 The provisions of this consent comprise all of the applicable terms and conditions between the parties.
- 18.2 It is declared by the parties that no further or other promises or provisions are, or will be claimed to be implied, or to arise between the parties by way of collateral or other agreement by reason of any promise, representation, warranty or undertaking given or made by any party (or its agent) to another, on or prior to the

## GENERAL CONDITIONS

execution of this deed, and the existence of any such implication or collateral or other agreement, is hereby negated by the parties.

- 18.3 Clauses 18.1 and 18.2 do not prejudice the ability of the parties to vary or amend this consent in accordance with the provisions of this consent or by a further consent in writing.

### 19. No transfer or assignment

The customer cannot transfer or assign the consent granted in clause 4.1 nor any other right or obligation the customer has or may have under this consent, without the prior consent in writing of Sydney Water.

### 20. Termination of consent by customer

- 20.1 Termination of this consent may be effected by the customer upon the giving of at least 30 days' notice in writing to Sydney Water. The notice must state the date on which this consent terminates.
- 20.2 The customer is bound by the provisions of this consent with regard to any discharge of trade wastewater into the sewer from the premises, including the payment of charges under clause 5.1, from the commencement of this consent until its termination.
- 20.3 Notwithstanding provisions contained elsewhere in this consent the parties may terminate this consent in writing by mutual agreement provided the parties enter into a further trade waste consent immediately following termination of this consent.

### 21. Notices and communications

- 21.1 A notice or communication under this consent must be in writing.
- 21.2 For purposes of clause 21.1, a notice or communication may;
- (a) be left at the address of the addressee; or
  - (b) be sent by prepaid ordinary post to the address of the addressee; or
  - (c) sent by facsimile transmission to the facsimile number of the addressee
  - (d) sent by email to the email address of the addressee as specified in schedule 8 or such other address as may be notified by the addressee to the other party.
- 21.3 Unless a later time is specified in it, a notice or communication takes effect from the time it is received.
- 21.4 Unless the contrary is shown, for purposes of clause 21.3, if a notice or communication is;
- (a) a letter sent by pre-paid post, it will be taken to have been received on the third day after posting; or
  - (b) a facsimile, it will be taken to have been received on receipt by the sender, of the written or oral advice of the addressee that the whole of the facsimile transmission has been received by the addressee in a form that is legible.

### 22. Miscellaneous

Each party must act in good faith in the implementation of this consent and, without limiting the scope of this obligation, must also seek to resolve any difference or dispute between them as to the consent in good faith.

### 23. Entire consent

This consent constitutes the entire agreement between the parties in relation to its subject matter. No understanding, arrangement or provision not expressly set out in this consent will bind the parties. Accordingly all correspondence, negotiations and other communications between the parties in relation to the subject matter of this consent that precede this consent are superseded by and merged in it.

Note: This consent has no effect until it is executed for and on behalf of Sydney Water Corporation.

### Contact Us

To find out more visit  
sydneywater.com.au  
or call 13 20 92

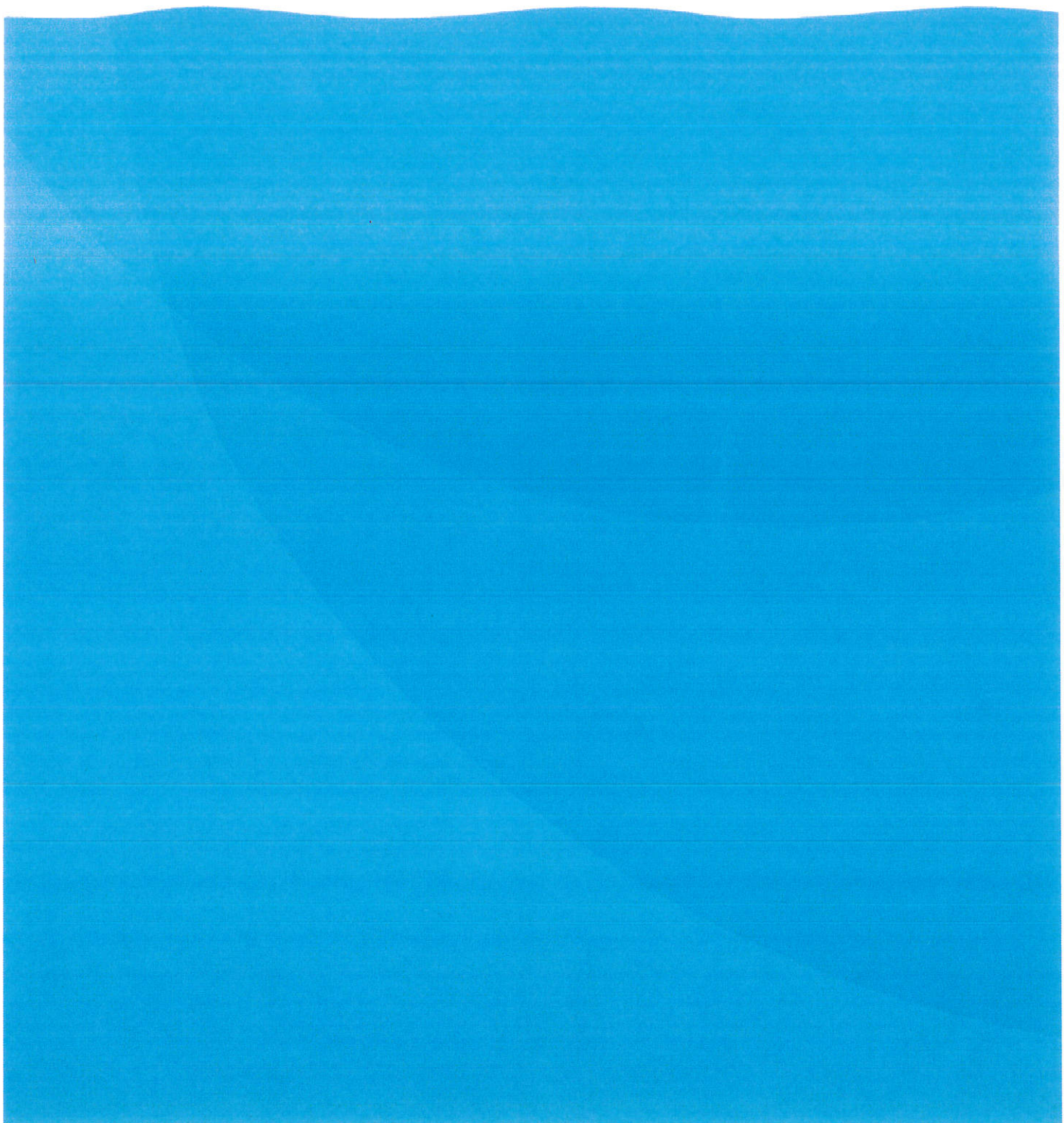
### Postal address

Sydney Water  
PO Box 399  
Parramatta NSW 2124

**Sydney Water**

ABN 49 776 225 038  
BCS034







Attachment 5: Consent to discharge Industrial Trade Wastewater Application Form

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# Consent to discharge industrial trade wastewater

## Application form

Full name of applicant (Block letters)			Sydney Water Account number	
Eddy Hawach			4535 938	
Business address where discharge will occur				
14 Kiara Crescent, Yennora			Phone	1300 141315
		Post code	2161	Fax
Postal address				
PO Box 4392, North Rocks			Phone	
		Post code	2151	Fax
Business trading name		Australian Company number (ACN)		
Enviro waste Services Group Pty Ltd		613987438		
Full name of occupier (if other than applicant):				
Details of contact person at the premises				
Name	Eddy Hawach		Phone	0420511727
Position title	Director		Fax	-
Email	eddy.h@envirowaste.com.au			
Emergency contact (outside business hours)				
Name	Eddy Hawach		Phone	0420511727
Principal business activity on-site				
Liquid waste disposal facility				
Processes generating trade wastewater		Office use only		
		Process description	Code	
1.	Grease trap waste removal depot			
2.				
3.				
4.				
5.				

If insufficient space above, attach a separate list.

Note: You must include a description of the general nature of the business, including details of the wastewater characteristics in Appendix C of this form. For more information, see *Industrial trade waste consent: What you need to apply for consent to discharge industrial trade wastewater*



## Discharge details

1. Does the property currently discharge trade wastewater to the wastewater system?				
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	If no, what is the expected commencement date of discharge?	Month	Year
2. Does the property have more than one connection to our wastewater system (sewer)?				
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, how many?		

Note. You must complete a separate application for each trade wastewater connection to our wastewater system.

## Pre-treatment

3. Is any of the trade wastewater treated before you discharge to our system			
<input checked="" type="checkbox"/> Yes	If yes, attach details of existing pre-treatment facilities as Appendix D	<input type="checkbox"/> No	If no, attach details of proposed pre-treatment facilities as Appendix D

See Appendix D in *Industrial trade waste consent: What you need to apply for consent to discharge industrial trade wastewater*

4. Grease traps must be cleaned by a Contractor registered with our Wastesafe system. If you have grease traps installed, we will determine the frequency your grease traps must be cleaned.	
Grease trap cleaning contractor	Wastesafe ID number
N/A	
5. After pre-treatment, will the trade wastewater be pumped to the wastewater system?	
<input type="checkbox"/> Yes	Attach the pump manufacturer's specification/brochure as Appendix E
<input checked="" type="checkbox"/> No	

See Appendix E in *Industrial trade waste consent: What you need to apply for consent to discharge industrial trade wastewater*

## Water meters

6. Is a water meter fitted to the premises?		
<input checked="" type="checkbox"/> Yes (supplying your business only)	How many meters?	1
<input type="checkbox"/> Yes (supplying other businesses/residences)	How many meters?	
List the serial number(s) on the meters:	• BDVB2469 • •	
<input type="checkbox"/> No	You must arrange to fit a water meter	
7. Will you use water other than Sydney Water mains supply on the premises (eg bore water, recycled water)?		
<input type="checkbox"/> Yes (Provide details)	NO	

**6. Is a water meter fitted to the premises?**

☐ No

Yes

**Rate of discharge**

**8. Estimate the maximum instantaneous rate of discharge to the wastewater system.**

6 litres/second

**9. Estimate the maximum daily rate of discharge to the wastewater system.**

250'000 litres

**10. Estimate the average daily rate of discharge to the wastewater system.**

220'000 litres

Note for questions 8, 9 and 10:

- A fully open tap will supply about 0.3 litres of water each second (about 1,000 litres an hour)
- As a guide, the maximum daily discharge is likely to be 20% more than the average.

**Flow meters**

**11. Is a discharge flow meter installed?**

☒ Yes

☐ No

**12. What are the details of the existing or proposed discharge flow meter?**

**Brand**

Siemens

**Model**

magflow

Note: You are required to install an approved discharge flowmeter. Visit [sydneywater.com.au](http://sydneywater.com.au) for information on flow measurement guidelines. Water meters are not suitable to measure the quantity of trade wastewater discharged and are not permitted for this purpose.

**Rainwater**

**13. Are there any discharges from your premises to our wastewater system that may contain rainwater?**

☐ Yes (You must complete Appendix F)

☒ No

**Details of operations**

**14. What hours will you discharge trade wastewater to our wastewater system?**

<b>Monday</b>	<u>12:01 am</u>	to	<u>23:59 pm</u>	<b>Thursday</b>	<u>12:01 am</u>	to	<u>23:59 pm</u>
<b>Tuesday</b>	<u>12:01 am</u>	to	<u>23:59 pm</u>	<b>Friday</b>	<u>12:01 am</u>	to	<u>23:59 pm</u>
<b>Wednesday</b>	<u>12:01 am</u>	to	<u>23:59 pm</u>	<b>Saturday</b>	<u>12:01 am</u>	to	<u>23:59 pm</u>
<b>Sunday</b>	<u>12:01 am</u>	to	<u>23:59 pm</u>				





15. How many people are (or will be) employed at the premises?

<u>3</u> people	This information allows us to estimate the volume of water used for domestic purposes
-----------------	---

16. Have you lodged a development application with your local council?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
---	-----------------------------


### Declaration, applicant and owner details

Full name of applicant	Signature	Date
Eddy Hawach		16-9-21
Name of witness	Signature	Date
Simon Saba		16-9-21

17. Are you (the applicant) also the owner or managing agent for the property?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
------------------------------	--

The owner/managing agent must declare, by providing their details and signing below, that they are aware of this application and the business conducted on the property.

Signature of owner or managing agent	Print name	Date
	Melissa Hawach	16-9-2
Role	Agency stamp	
<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Managing agent		

## Appendices

Attach appendices A to F (plus any other relevant appendices) to this application. Please read each section of *Industrial trade waste consent: What you need to apply for consent to discharge industrial trade wastewater* and submit appendices as appropriate.

Appendix	Title	Attached?	
A	Site plan	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B	Plan of any proposed drainage	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
C	Nature of business: industrial processes	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
D	Pre-treatment equipment	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
E	Pump specifications	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
F	Open area details (details of any discharges that may contain rainwater)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### Appendix A

#### Site plan

Your site plan should be no larger than A3 (297 mm x 420 mm). See *Industrial trade waste consent: What you need to apply for consent to discharge industrial trade wastewater* for more information.

### Appendix B

#### Plan of proposed drainage

Attach a sewer service diagram.

### Appendix C

#### Nature of business: Industrial processes

Grease trap waste recival depot



**Table 1 Substances:**

Indicate, in milligrams per litre, the Average Concentration of all substances expected to be present in the trade wastewater discharge. Please also indicate (including the amount) any raw materials, products, chemicals or other goods, stored on site, which may contain the substances listed below.

Substance	Average concentration mg/L	Tick if stored	Amount stored Kg
Biochemical Oxygen Demand		✓	
Suspended Solids		✓	
Grease – Total		✓	
Sulphate			
Ammonia		✓	
Nitrogen			
Phosphorus			
Aluminium			
Arsenic			
Barium			
Benzene			
Biocides			
Boron			
Bromine			
Cadmium			
Chlorinated phenolics			
Chlorine			
Chromium			
Cobalt			
Copper			
Cyanide			
Flammable/Explosive Substances			
Fluoride			
Formaldehyde			
Herbicides and defoliants			
Iron			
Lead			
Lithium			
Manganese			
Mercaptans			
Mercury			



## Appendix D

### Pre-treatment equipment

Attach a floor plan and a schematic process instrumentation diagram as described in *Industrial trade waste consent: What you need to apply for consent to discharge industrial trade wastewater*

## Appendix E

### Pump specifications

If the final discharge (after pre-treatment) is, or will be, pumped to our wastewater (sewerage) system, please attach the pump manufacturer's specifications/brochure and the performance curve. Include information as detailed in *Industrial trade waste consent: What you need to apply for consent to discharge industrial trade wastewater*.

## Appendix F

### Open area information

Attach statement from your local council asking us to accept run-off from the open area as outlined in *Industrial trade waste consent: What you need to apply for consent to discharge industrial trade wastewater*, and answer the questions below.

1. Why can't the open area be roofed?

.....

.....

.....

2. Why is the area considered 'contaminated'? (Attach letter from the Environment Protection Authority or Council as evidence)

.....

.....

.....

3. What is the length of the area in meters? \_\_\_\_\_

What is the width of the area in metres? \_\_\_\_\_

Or

What is the total area in square metres? \_\_\_\_\_

4. What automatic rainwater controls do you propose to use? (Provide details of 'first flush' collection and bypass system).

.....

.....

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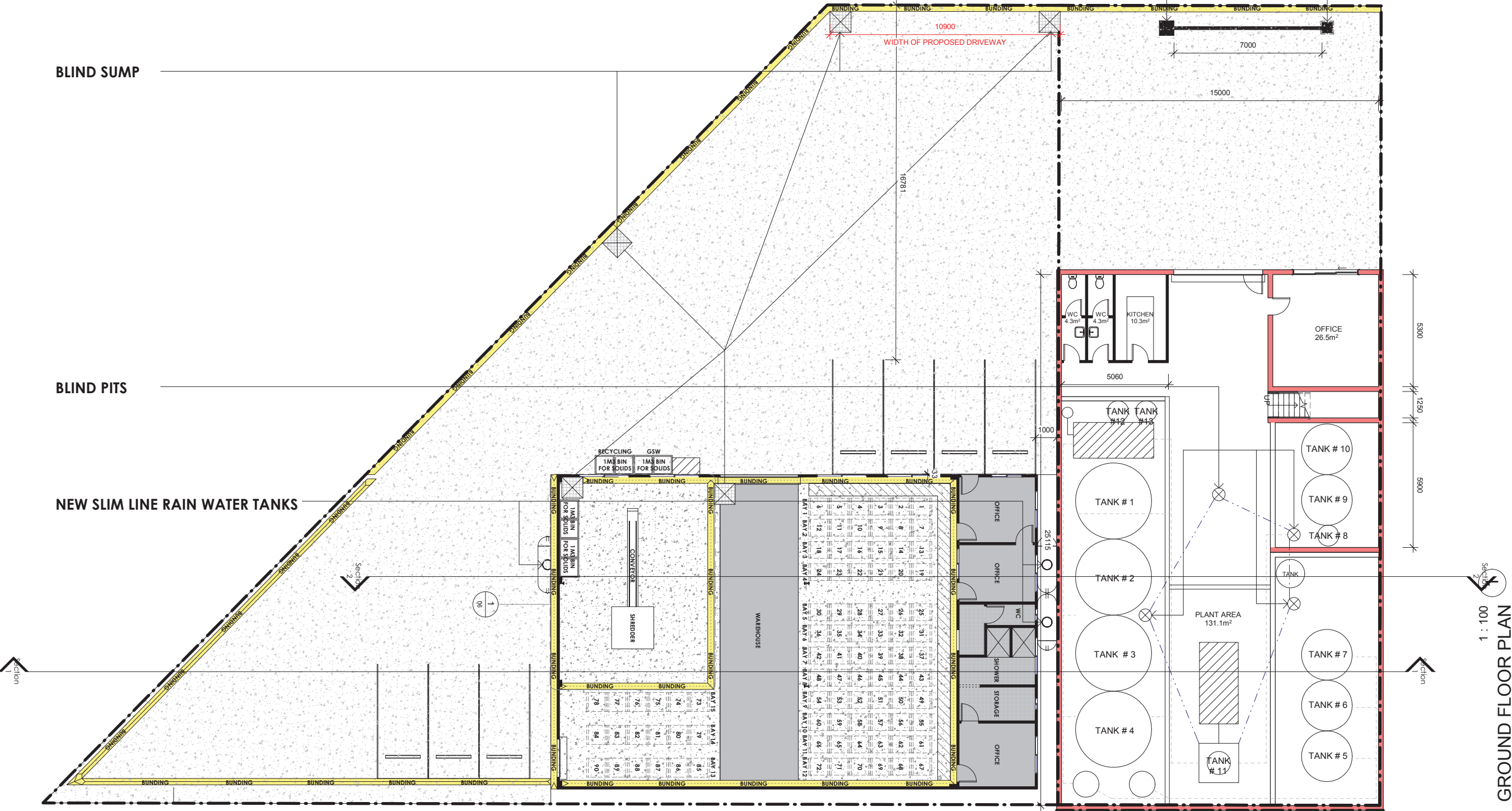
BUNG - CLOSING OFF DISCHARGE OUTLET

ISOLATED STORMWATER PITS AND GRATES

BLIND SUMP

BLIND PITS

NEW SLIM LINE RAIN WATER TANKS



GROUND FLOOR PLAN

FOR DA APPROVAL

REV	DESCRIPTION	DATE	BY
A	APPLICATION FOR APPROVAL	26.06.20	

**baini**design

**BAINI DESIGN**  
ABN 51 068 732 593  
18 Villiers street  
Parramatta, NSW 2150  
Sydney, Australia  
Phone + 61 2 9188 8250  
info@bainidesign.com.au  
www.bainidesign.com.au



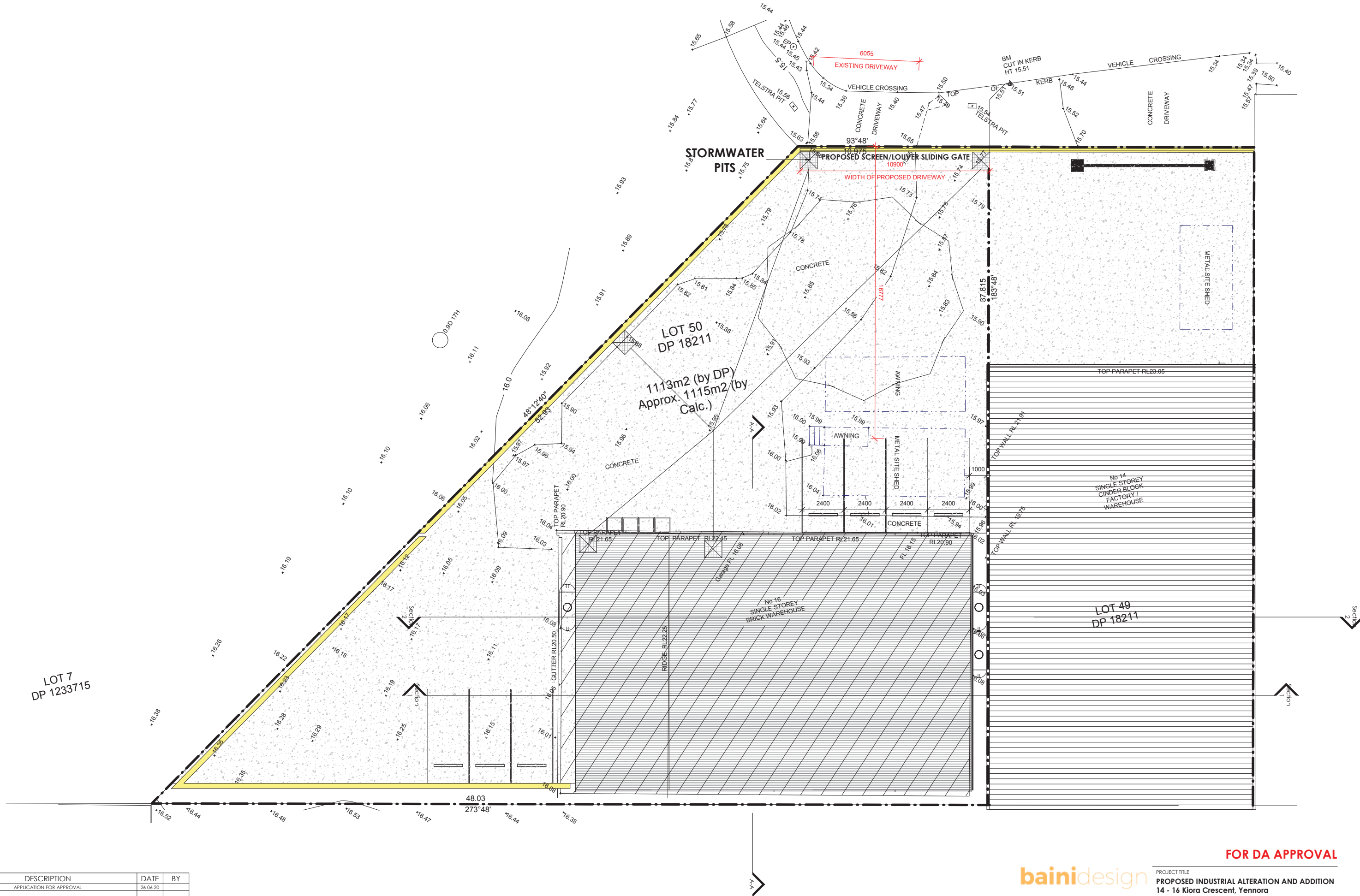
PROJECT TITLE			
PROPOSED INDUSTRIAL ALTERATION AND ADDITION			
14 - 16 Kiara Crescent, Yennora			
DRAWING TITLE			
FLOOR PLANS			
PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
20097	01	06/07/17	A
	SCALE @ A1	DRAWN BY	CHECKED BY
	1 : 100	GA	CB

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1 : 100  
1  
SITE PLAN

REV	DESCRIPTION	DATE	BY
A	APPLICATION FOR APPROVAL	26.06.20	



FOR DA APPROVAL

**baini**design

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www.bainidesign.com.au



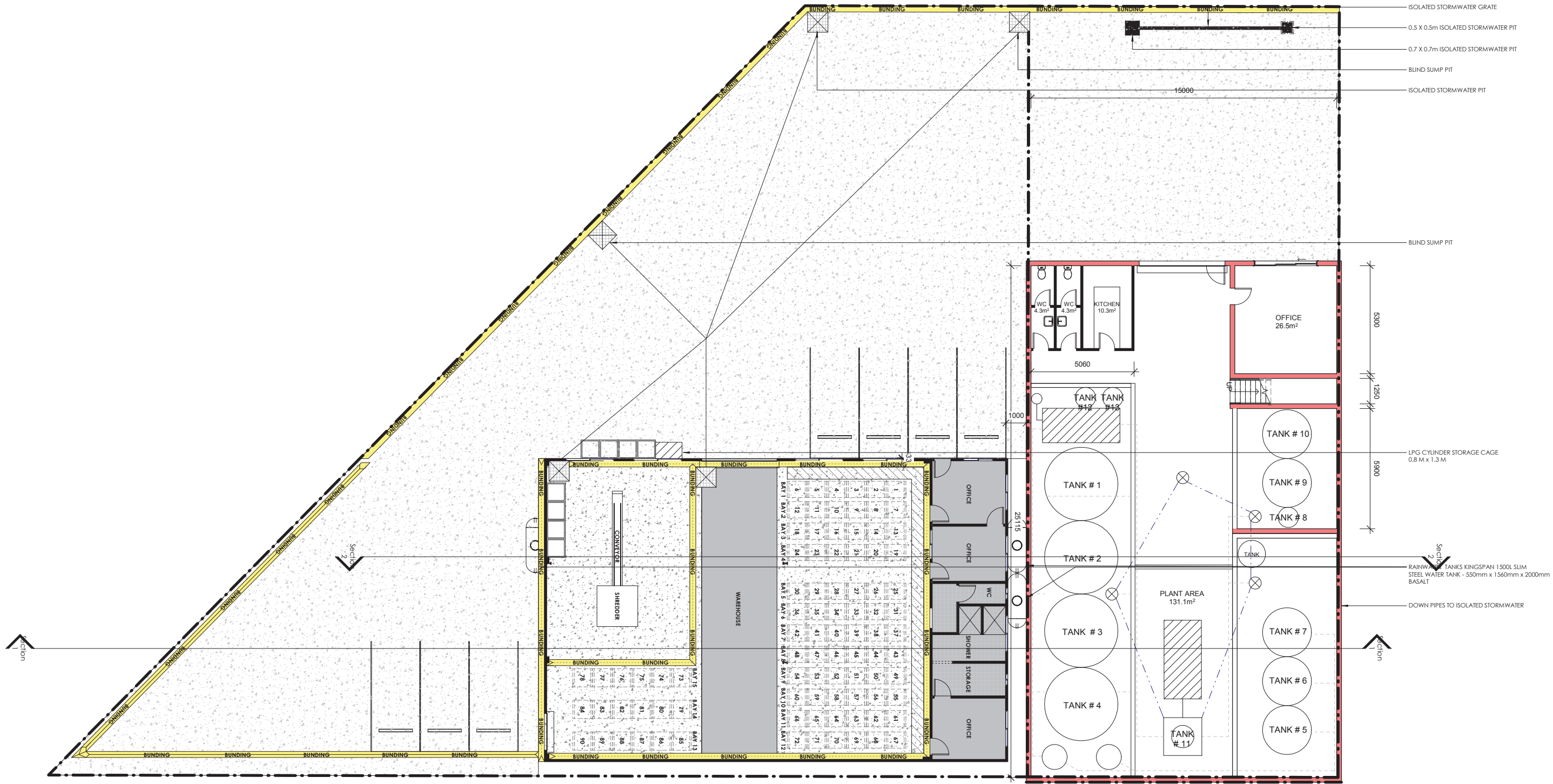
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**PROPOSED INDUSTRIAL ALTERATION AND ADDITION**  
**14 - 16 Kiara Crescent, Yennora**  
DRAWING TITLE  
**SITE PLAN**

PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
<b>20097</b>	<b>02</b>	<b>06/26/20</b>	<b>A</b>
SCALE @ A1 <b>1 : 100</b>	DRAWN BY <b>GA</b>	CHECKED BY <b>CB</b>	

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1 : 100  
DRAINAGE PLAN

REV	DESCRIPTION	DATE	BY
A	APPLICATION FOR APPROVAL	26.06.20	



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www.bainidesign.com.au



PROJECT TITLE  
**PROPOSED INDUSTRIAL ALTERATION AND ADDITION  
14 - 16 Kiara Crescent, Yennora**  
DRAWING TITLE  
**DRAINAGE PLAN**

PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
<b>20097</b>	03	06/26/20	A
	SCALE @ A1 1 : 100	DRAWN BY GA	CHECKED BY CB

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**FOR DA APPROVAL**





1 SHREDDER DETAIL  
1 : 50



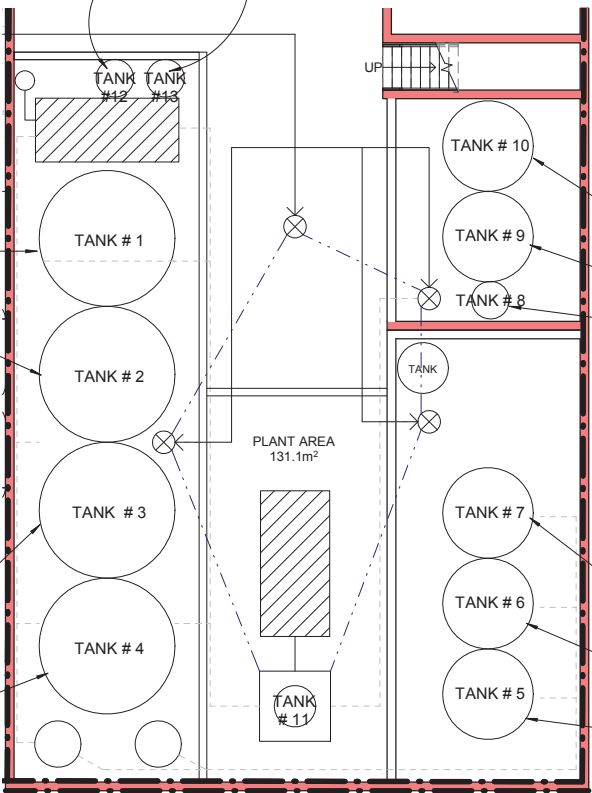
TANKS 1 & 2



TANKS 3 & 4



TANKS 12 & 13



2 TANKS DETAIL  
1 : 100



TANKS 8, 9 & 10



TANKS 5, 6 & 7

Tank 1  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants  
Liquid J120

Tank 2  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants

Tank 3  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants

Tank 4  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants

Tank 5/6  
Liquid J120

Tank 7 (settling)  
Liquid J120  
Liquid & sewer (K130) & stormwater

Tank 8/9  
Liquid J120

Tank 10  
Liquid grease trap waste

Tank 11-east  
Liquid J120

Tank 11-west  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants

Tank 12  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants  
Liquid J120

Tank 13  
Liquid & sewer (K130) & stormwater  
Sullage N205 landfill leachates M250 surfactants  
Liquid J120

REV	DESCRIPTION	DATE	BY

**baini**design

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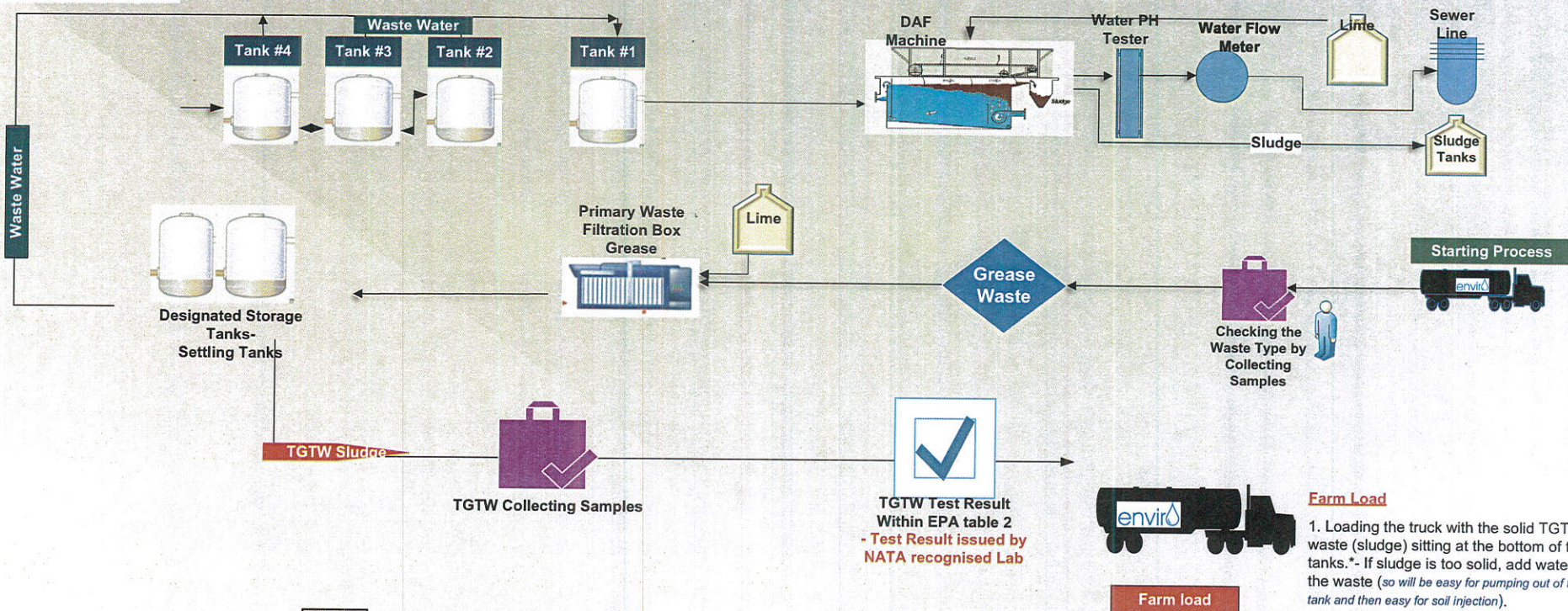
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DRAWING TITLE			
TANK & SHREDDER DETAIL			
PROJECT NUMBER	DRAWING NUMBER	DATE	REVISION
20097	06	09/04/20	
SCALE @ A1 AS indicated	DRAWN BY GA	CHECKED BY CB	

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**DRAFT**



## WORKSHOP FLOW DIAGRAM GREASE TRAP WASTE TREATMENT



A

### Grease Trap Waste Treatment Process

1. **Unload** Grease waste truck through the filtration (Separation) bin. ( *to remove physical contaminants* )
2. **Adding Lime** ( *to separate floating fats/oil* ) and **adjust the pH level if Low**
3. Grease waste liquid pumped out to designated tanks for settling after screening.
4. **Waste Water** pumped out from the designated tanks to tank no. 1 and then to the DAF , ( *grease waste staying in the tanks to settle , so the floating fats & Oil and settleable portions are separated* )

B

### Sampling Process

#### Weekly Composite-5 samples/week

- \*- 1 individual sample per day- from the settling tank
- \*- Repeat daily to obtain 5 samples per week to produce 1 weekly composite.
- \*- Mix the 5 samples together and place them in a container marking with "Weekly Composite Sample- Weekending xx-xx-xx."
- \*- Complete the COC and send the sample to the lab. for testing

#### Monthly Composite-5 samples/month

- \*- 1 individual sample per week random- from the settling tank.
- \*- Repeat weekly for 4 weeks to **obtain total of 4 samples**.
- \*- The 5<sup>th</sup> individual sample may be taken on the day the monthly composite sample is to be generated.
- \*- Mix the 5 samples and place in a container marking with "Monthly Composite sample-Month ending xx-xx"

C

### Testing Process

#### Weekly & Monthly Composite

- \*- samples to be placed in 500ml container.
- \*- To be clearly marked with date/description and collected by.
- \*- Complete the COC and send the sample to the lab. for testing.

#### Before having the batch released-

#### Test Result Validation

When receiving the test report, the results of all chemicals & other attributes to be validated against the max average concentration- Table 2,

### Farm Load

1. Loading the truck with the solid TGTW waste (sludge) sitting at the bottom of the tanks.\*- If sludge is too solid, add water to the waste (so will be easy for pumping out of the tank and then easy for soil injection).
2. The following documents must be taken when delivering TGTW to the Farm:
  1. Test result
  2. Statement of Compliance



Application No. 8469729

Created on 28/06/2013 11:44:00

METROPOLITAN WATER SEWERAGE AND DRAINAGE BOARD

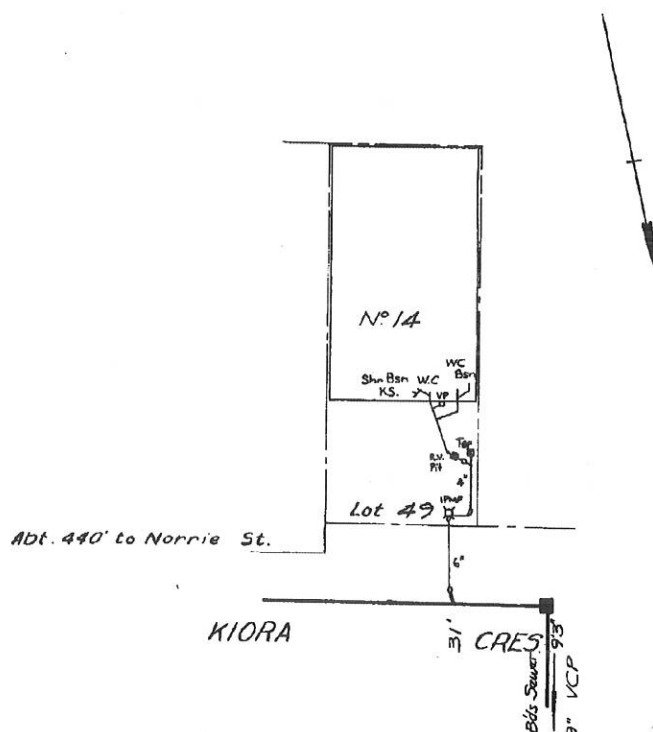
**SEWERAGE SERVICE DIAGRAM**PROGRAMME  
CORPMunicipality of *Holroyd*No. *817749*

SYMBOLS AND ABBREVIATIONS					
<input type="checkbox"/> Boundary Trap	<input type="checkbox"/> R.V. Reflux Valve	I.P. Induct Pipe	Bsn. Basin		
<input type="checkbox"/> Pit	— Cleaning Eye	M.F. Mica Flap	Shr. Shower		
<input type="checkbox"/> G.I. Grease Interceptor	○ Vert. Vertical Pipe	T. Tubs	W.I.P. Wrought Iron Pipe		
<input type="checkbox"/> Gully	○ V.P. Vent. Pipe	K.S. Kitchen Sink	C.I.P. Cast Iron Pipe		
<input type="checkbox"/> P.T. P. Trap	○ S.V.P. Soil Vent. Pipe	W.C. Water Closet	F. W. Floor Waste		
<input type="checkbox"/> R.S. Reflux Sink	D.C.C. Down Cast Cowl	B.W. Bath Waste	W.M. Washing Machine		

Scale: 40 Feet To An Inch

**SEWER AVAILABLE**

Where the sewer is not available and a special inspection is involved the Board accepts no responsibility for the suitability of the drainage in relation to the eventual position of the Board's Sewer

*SPECIAL INSPECTION**Plg. & Dgo Not Supervised.*RATE No. \_\_\_\_\_ W.C.s. *1* U.C.s. \_\_\_\_\_ 19\_\_\_\_SHEET No. *7347*

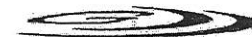
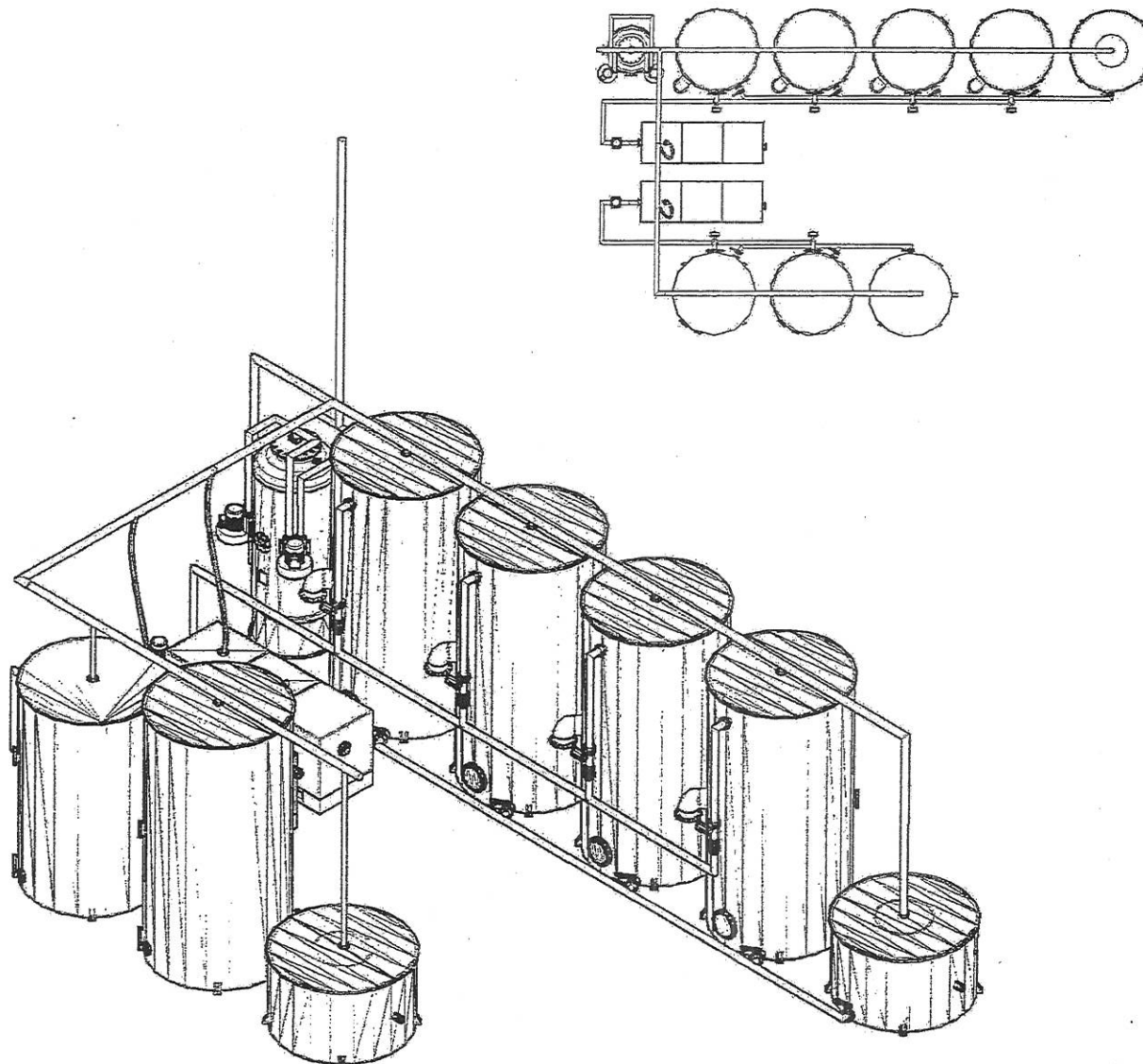
OFFICE USE ONLY

For Engineer House Services

DRAINAGE			PLUMBING		
W.C.	Supervised by	Date	BRANCH OFFICE	Supervised by	Date
Bth.			Date		
Shr.	Inspector		Outfall <i>FF</i> HL	Inspector	
Bsn.	Examined by		Drainer		
K.S.			Plumber		
T.					
Plg.	Chief Inspector				

*1208 548*

NOTE This diagram only indicates availability of a sewer and any sewerage service shown as existing in Sydney Water's records. The existence and position of Sydney Water's sewers, stormwater channels, pipes, mains and structures should be ascertained by inspection of maps available at any of Sydney Water's Customer Centres. Position of structures, boundaries, sewers and sewerage services shown hereon are approximately only.



## GEBEL Aquasafe

26 Coombes Dr, Penrith NSW 2750  
Phone (02)4722 9696 Fax (02)4722 9506

Drawn : M.T. Approved : A.P.

Date: 10 JULY 13 Scale: N.T.S A3

Drawing No.:GA1350-ESG-01 Rev: 0

CUSTOMER :

ENVIRO SERVICES GROUP

PO. NO. :

DESCRIPTION :

WASTE PLANT

NOTES :

If any discrepancies with this drawing,  
please email.  
drafting@gebelaquasafe.com.au

### WORKING DRAWING APPROVAL

I approve this drawing for manufacture, this  
drawing is the drawing of which the tank will be  
manufactured and supplied to, please ensure that  
all dimensions and tolerance  $\pm 2\text{mm}$  are  
correct. If dimension are not shown Gebel will  
follow standard practices / sizes for manufacture

Please note that if a change is made after a PO  
is placed or production is in progress, GEBEL  
Aquasafe has the right to charge fix rate extras  
to the order.

APPROVED / NOT APPROVED

Name:

Company:

Signature:

Date:

COPYRIGHT:-  
THIS DESIGN IS THE COPYRIGHT OF  
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USED OR COPIED WITHOUT THE  
CONSENT OF GEBEL AQUASAFE





**AIR QUALITY AND ODOUR MANAGEMENT PLAN**  
**PREPARED FOR**  
**ENVIRO WASTE SERVICES GROUP PTY LTD**  
**14-16 KIORA CRESCENT, YENNORA NSW**

**Prepared for:** Enviro Waste Services Group Pty Ltd

---

**Prepared by:** Victoria Hale, Senior Environmental Scientist  
Kate Barker, Senior Environmental Scientist  
Linda Zanotto, Senior Environmental Engineer  
R T Benbow, Principal Consultant

---

**Report No:** 191251-04\_AQOMP\_Rev2  
April 2022  
(Released: 28 April 2022)



**Benbow**  
ENVIRONMENTAL

*Engineering a Sustainable Future for Our Environment*

Head Office: 25-27 Sherwood Street, Northmead NSW 2152 AUSTRALIA  
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**Visit our website: [www.benbowenviro.com.au](http://www.benbowenviro.com.au)**

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## DOCUMENT CONTROL

<b>Title</b>	Air Quality and Odour Management Plan			
<b>Description</b>	A plan to manage air emissions from the facility in accordance with Schedule 2, Part B, Conditions B21 and B22 of Project Approval SSD-10407.			
<b>Created By</b>	Benbow Environmental			
<b>Date Created</b>	11 January 2022			
<b>Version Number</b>	<b>Modified By</b>	<b>Modifications Made</b>	<b>Date Modified</b>	<b>Status</b>
Revision 1	Benbow Environmental	Issue of draft	11/1/2022	For client & EPA approval
Revision 2	Benbow Environmental	Updated as per EPA feedback	28/4/2022	For DPIE approval



**Benbow**  
ENVIRONMENTAL

A.B.N. 17 160 013 641

**Head Office:**

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P.O. Box 687 Parramatta NSW 2124 Australia  
Telephone: +61 2 9896 0399 Facsimile: +61 2 9896 0544  
E-mail: [admin@benbowenviro.com.au](mailto:admin@benbowenviro.com.au)

Visit our Website at [www.benbowenviro.com.au](http://www.benbowenviro.com.au)

## GLOSSARY AND ABBREVIATIONS

AQMP	Air Quality & Odour Management Plan
AMMAAP	Approved Methods for the Modelling and Assessment of Air Pollutants in NSW
AMSAAP	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW
BCA	Building Code of Australia
BOM	Bureau of Meteorology
Council	Cumberland Council
DPIE	Department of Planning, Industry and Environment
ECO	Emergency Control Organisation
EIS	Environmental Impact Statement
EP	Emergency Plan
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPL	Environment Protection Licence under the POEO Act
FR NSW	Fire and Rescue New South Wales
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.
Industrial liquid waste	Liquid wastes from industrial sources, including Waste Oil (J120), Surfactants (M250), Grease trap waste (K110), Sewage sludge and stormwater (K130), and Landfill leachate (N205), as described in the EIS.
Liquid food waste	Waste consumable liquids such as juices and soft drinks (but not including dairy products), including out-of-date liquids, as described in the EIS
Liquid product waste	Waste liquid products such as shampoos, soaps etc., including out-of-date liquids, as described in the EIS
LWTP	Liquid waste treatment plant
Material harm	Is harm that: <ul style="list-style-type: none"> <li>a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or</li> <li>b) 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)</li> </ul>
N/A	Not applicable
Non-compliance	An occurrence, set of circumstances or development that is a breach of consent SSD-10407.
NSW	New South Wales
OEMP	Operational Environmental Management Plan
OTMPPS	Operational Traffic Management Plan and Parking Strategy
OSD	On-site detention
PIRMP	Pollution Incident Response Management Plan
PM <sub>2.5</sub>	Particulate matter of size 2.5 µm
PM <sub>10</sub>	Particulate matter of size 10 µm
POEO Act	Protection of the Environment Operations Act 1997
RNP	NSW EPA Road Noise Policy
SEPP	State Environmental Planning Policy
SWMP	Surface Water Management Plan
TfNSW	Transport for New South Wales
WHS	Work, Health and Safety
WMP	Waste Management Plan

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## Attachments

Attachment 1: EPA Response 7 April 2022



# 1. INTRODUCTION

Benbow Environmental have been commissioned by Enviro Waste Services Group Pty Ltd to prepare an Air Quality and Odour Management Plan (AQOMP) as required by the Development Consent SSD-10407 from the NSW Government Department of Planning, Industry and Environment for the Yennora Liquid Waste Treatment Plant (SSD-10407) located at 14-16 Kiora Crescent, Yennora.

The report has been prepared by the following suitably qualified Benbow Environmental consultants:

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Enviro waste will not commence operation until the AQOMP is approved by the Planning Secretary and will operate the development in accordance with the approved AQOMP.

## 1.1 PURPOSE AND OBJECTIVES

The purpose of this plan is to provide an overview of the air quality and odour management practices to be undertaken at the premises, and to ensure that site processes are undertaken in accordance with regulatory requirements and in line with industry best practices.

The scope of this AQOMP is limited to the following objectives:

- Be prepared in consultation with the EPA;
- Detail and rank all emissions from all sources of the development, including odour;
- Describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;
- Identify the control measures that that will be implemented for each emission source;
- And describe the following for each of the proposed controls:
  - ▶ key performance indicator;
  - ▶ monitoring method;
  - ▶ location, frequency and duration of monitoring;
  - ▶ record keeping;
  - ▶ complaints register;
  - ▶ response procedures; and
  - ▶ compliance monitoring.



## 1.2 CONSENT CONDITIONS

This AQOMP has been prepared in accordance with Part B, Conditions B21 and B22 and Part C, Conditions C1, C5 and C6 of Schedule 2 of the Project Approval SSD-10407. These conditions of consent are displayed in the tables below and the section indicated where the condition has been addressed.

Table 1-1: Project Approval SSD-10407 – Schedule 2, Part B, Conditions B21 and B22

Condition	Section of Document Addressing Condition
<p>B21. Prior to the commencement of operation, the Applicant must prepare an Air Quality and Odour Management Plan (AQOMP) to the satisfaction of the Planning Secretary. The AQOMP must form part of the OEMP required by Condition C2. The AQOMP must: be prepared by a suitably qualified and experienced person(s); be prepared in consultation with the EPA; detail and rank all emissions from all sources of the development, including odour; describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators; identify the control measures that that will be implemented for each emission source; and describe the following for each of the proposed controls:</p> <ul style="list-style-type: none"> <li>(i) key performance indicator;</li> <li>(ii) monitoring method;</li> <li>(iii) location, frequency and duration of monitoring;</li> <li>(iv) record keeping;</li> <li>(v) complaints register;</li> <li>(vi) response procedures; and</li> <li>(vii) compliance monitoring.</li> </ul>	<p>3.2</p> <p>5</p> <p>5</p> <p>6</p> <p>6.1</p> <p>7</p> <p>5</p>
<p>B22. The Applicant must: not commence operation until the AQOMP required by Condition B21 is approved by the Planning Secretary; and implement the most recent version of the AQOMP approved by the Planning Secretary for the duration of the development.</p>	<p>Yes</p>

Table 1-2: Project Approval SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
<p>C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> <li>(a) detailed baseline data;</li> <li>(b) details of: <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures and criteria; and</li> <li>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> </li> <li>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>(d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the development; and</li> <li>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</li> </ul> </li> <li>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</li> <li>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</li> <li>(ii) complaint;</li> <li>(iii) failure to comply with statutory requirements; and a protocol for periodic review of the plan.</li> </ul> </li> </ul> <p><b>Note:</b> The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	<p>4</p> <p>3.1</p> <p>3.3</p> <p>3.2</p> <p>2.2</p> <p>5</p> <p>5</p> <p>7</p> <p>8</p> <p>6</p>
<p>C5. Within three months of:</p> <ul style="list-style-type: none"> <li>(a) the submission of a Compliance Report under Condition C11;</li> <li>(b) the submission of an incident report under Condition C7;</li> <li>(c) the submission of an Independent Audit under Condition C13;</li> <li>(d) the approval of any modification of the conditions of this consent; or the issue of a direction of the Planning Secretary under Condition A2(b) which requires a review,</li> </ul> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing that a review is being carried out.</p>	<p>Yes</p>

Table 1-2: Project Approval SSD-10407 – Schedule 2, Part C, Conditions C1, C5 and C6

Condition	Section of Document Addressing Condition
C6. If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.	Yes
<b>Note:</b> This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	

### 1.3 CONSULTATION

The draft copy of the AQOMP was provided to the EPA on 20 January 2022. An email response was provided on 7 April 2022 as provided below and in full in Attachment 1.

*The EPA considers that the plan broadly covers the recommended framework. At a high level, the overall approach in the management plan minimises the risk of off-site impacts, however, the plan needs to be revised to address the deficiencies below and strengthen the quality and auditability of the plan.*

#### 1. Performance indicators

*The plan specifies periodic VOCs and Benzene emissions monitoring will be undertaken. However, the licensee has not specified clear key performance indicators or key targets to demonstrate that various parts of their operation will be operated and maintained in a proper and efficient manner on an ongoing basis. For instance, it should be noted that the plan does not include clear measures for routine and non-routine inspections and maintenance of the odour control equipment, including the biotrickling filter. This is of particular interest, given this is one of the main controls identified to reduce the risk of off-site impacts.*

*Further, monitoring and recording key performance indicators can complement the complaint investigations. As such, this type of information should also be included in the incident reporting sheet.*

#### Comment:

Performance indicators have been revised and Section 3.2 of the AQOMP has been updated. In particular, the routine measurements for the biotrickling filter system (for temperature and pH) have been included in this table to demonstrate the operation is being maintained in a proper and efficient manner on an ongoing basis.

The incident reporting form in Section 6.2 has been updated to include monitoring and recording of key performance indicators.



## 2. Odour

*The plan indicates that an odour audit will be undertaken within 6 months of commencing operations. The plan does not, however, include the objective of the odour audit nor does it include clear criteria to determine the need for additional steps, including the implementation of supplementary mitigation measures.*

*The plan does not mention additional mitigation options that could be implemented should odour problems occur once operating at the increased capacity. Nonetheless, it is noted that in their response to submissions, the proponent identified additional in-line pollution control devices such as activated carbon filters and biotrickling filters and air extraction at fugitive sources.*

### Comment:

Section 5 has been updated to include the objective of the odour audit, criteria and additional steps including the implementation of supplementary mitigation measures.

## 3. Additional considerations

*As previously indicated, the plan lacks measurable and auditable information. As such, it is considered that the plan needs to be revised by including:*

- *Process parameters that can be continuously monitored and recorded to ensure that the plant and controls are maintained and operated in a proper and efficient manner on an ongoing basis.*

### Comment:

Process parameters for the biotrickling filter system include temperature and pH. These are measured on a routine basis and recorded to ensure the system is operated in a proper and efficient manner. KPIs have been included in this AQOMP.

- *Process parameters which are monitored and recorded by the Licensee for the purposes of ensuring that air emissions and odour testing is undertaken at representative operating conditions and ranges.*

### Comment:

Process parameters monitored to ensure air emissions and odour monitoring is undertaken at representative operating conditions and ranges include. Worst case operational conditions for odour are during tanker truck receipt of liquid sewage waste. Worst case operational conditions for VOCs are during tanker truck receipt of grease trap waste. Monitoring is to be conducted where practical during worst case operations.



- *The QA/QC measures implemented by the Licensee to verify test results provided by the contractor.*
- *The criteria developed by the Licensee to review and approve the monitoring reports provided by the contractor.*
- *Verification measures and 'pre-determined indicators' used for evaluating the on-going performance and operational efficiency of the control equipment. Clear action against each identified 'pre-determined indicators'*

Comment:

All samples will be sent to a NATA accredited laboratory. Licensee will ensure monitoring will be conducted where practical during worst case operations.

The criterion for VOCs is stipulated in the EPL. The odour criteria are provided in section 5.2. Monitoring results can be reviewed by a suitably qualified environmental consultant.

See Section 2.2.1 regarding pre-determined indicators for the biotrickling filter system.

- *Specific response mechanisms or contingency strategies to address system or operational failures, including those for the emissions controls.*

Comment:

Refer to the revised Contingency Plan in Section 7.

- *The personnel responsible to action investigations and/or corrective measures, should performance issues be identified, or odour complaints occur.*

Comment:

Included in Section 6.

- *Incident reporting sheets that includes the plant and controls key performance indicators to be checked when investigating complaints.*

Comment:

Incident reporting form updated. See Section 6.2.

- *Additional control strategies, including engineering controls specified in the Response to Submissions – Yennora Liquid Waste Treatment Plant, Benbow Environmental, February 2021*

Comment:

Added to Section 7.1.

## 2. PROJECT INFORMATION

Enviro Waste has approval to process 110,000 tonnes per annum and store a maximum quantity of 477 tonnes on site. The limits of approval are as follows:

- Receipt and processing of no more than 100,000 tonnes of industrial liquid waste per year;
- Receipt and processing of no more than 10,000 tonnes combined of liquid product waste, liquid food waste, shoes, make up or clothes per year;
- Storage of no more than 377 tonnes of liquid waste at any one time (industrial liquid waste and liquid product waste) at the Liquid Waste Treatment Plant (LWTP) at 14 Kiora Crescent;
- Storage of no more than 100 tonnes (combined) of liquid product, liquid food waste, shoes, make up or clothes at any one time at Waste Processing Facility (WPF) at 16 Kiora Crescent; and
- No dairy products, including out-of-date dairy products can be received at the site.

The site activities and site use are described below.

### 2.1 PROCESS DESCRIPTION

#### 2.1.1 14 Kiora Crescent, Yennora

The facility receives liquid wastes including:

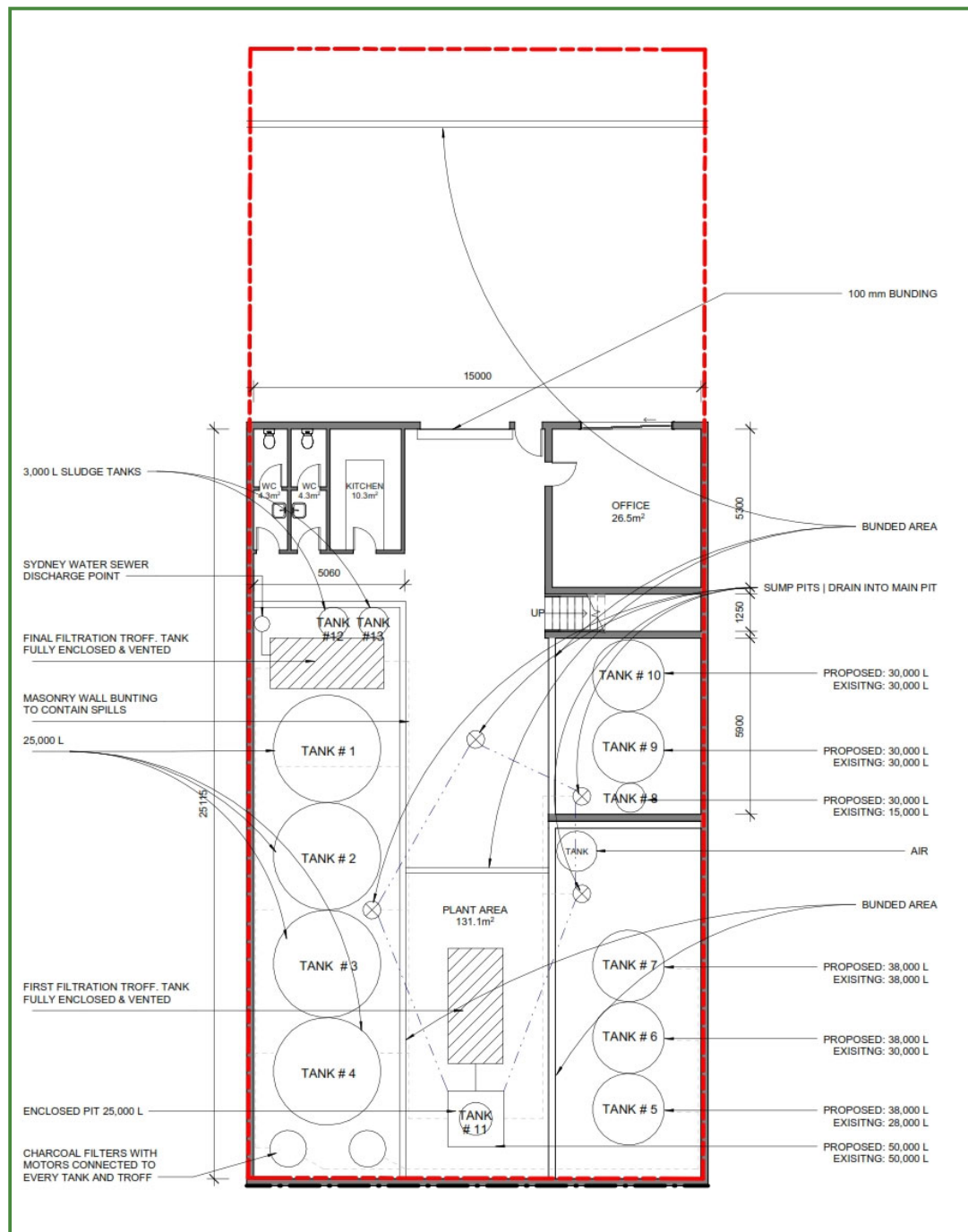
- Residues from industrial waste treatment/disposal operations – landfill leachates (N205);
- Liquid waste material in glass, plastic or aluminium containers;
- Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials (M250);
- Waste oil/hydrocarbons mixtures/emulsions in water (J120);
- Sewage sludge & residues (K130); and
- Grease trap waste (K110).

The operation of the facility involves the following activities:

- Unloading and loading of liquid waste from tanker trucks;
- Filtration of solid debris;
- Separation of solids;
- Separation of oils and sludge; and
- Separation of oil and water.

Figure 2-1 shows the site plan and layout (including tank quantities) at the 14 Kiora Crescent site.

Figure 2-1: Floor plan for 14 Kiora Crescent



## 2.1.2 16 Kiora Crescent, Yennora

The facility at 16 Kiora Crescent receives up to 10,000 tonnes per annum of waste including out-of-date liquid product/food waste for destruction. The total waste storage at any one time is limited to 100 tonnes. Details are provided below.



#### **Incoming waste type (tonnes per annum)**

- Out-of-date liquids (food waste): 6,700
- Shampoo/liquid soaps: 1,600
- Shoes: 200
- Clothes: 250
- Makeup: 1,250
- Total: 10,000**

#### **Outgoing waste type (tonnes per annum)**

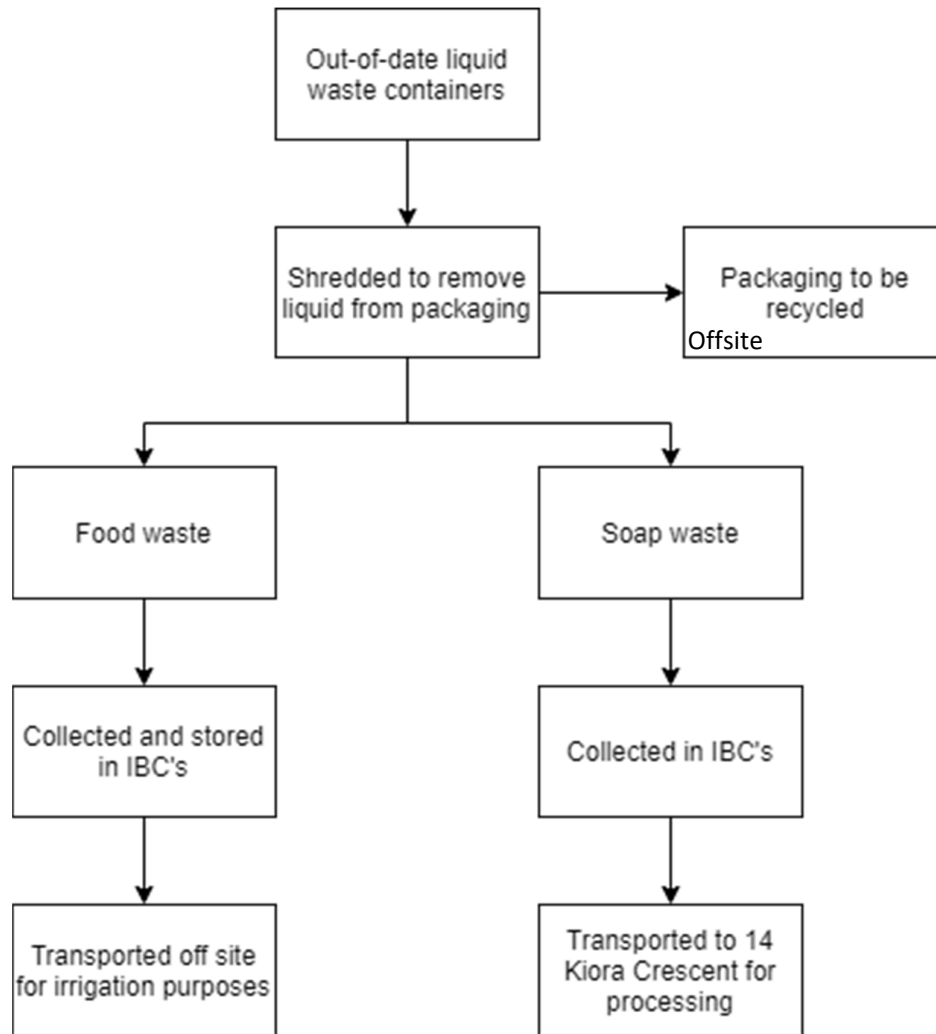
- Plastic: 950
- Cardboard: 950
- Aluminium: 950
- Liquid food waste: 4,600
- Liquid waste (other – for processing at 14 Kiora Crescent): 1,100
- Steel: 450
- Timber: 250
- Glass: 450
- Cloth: 200
- General solid waste: 100
- Total: 10,000**

The destruction and disposal of out-of-date liquid products/food wastes would involve the following:

- Out-of-date, expired or perishable liquid food waste (such as fruit juices, soft drinks, shampoos and soaps) are divided by waste stream (food waste/liquid soaps etc.) and fed into a shredder to separate liquids from packaging.
- Shredded packaging containers (cardboard, plastics, aluminium) are collected and recycled.
- Liquid food wastes are collected into intermediate bulk containers (IBCs) and stored at 16 Kiora Crescent.
- Liquid soap wastes are collected and sent to 14 Kiora Crescent for further processing.
- IBCs containing food waste are transported off site to be used in irrigation practices for agricultural properties/farmlands. The contents of the IBCs would comply with the relevant resource recover exemptions/orders and/or NSW Department of Environment and Conservation “Use of Effluent by Irrigation” (2004) and ANZECC & ARMICANZ “Guidelines for Fresh and Marine Water Quality” Volume 3, Primary Industries — Rationale and Background Information (Irrigation and general water uses, stock drinking water, aquaculture and human consumers of aquatic foods) (2000).

Figure 2-2 shows the process diagram for out-of-date liquid product destruction at 16 Kiora Crescent.

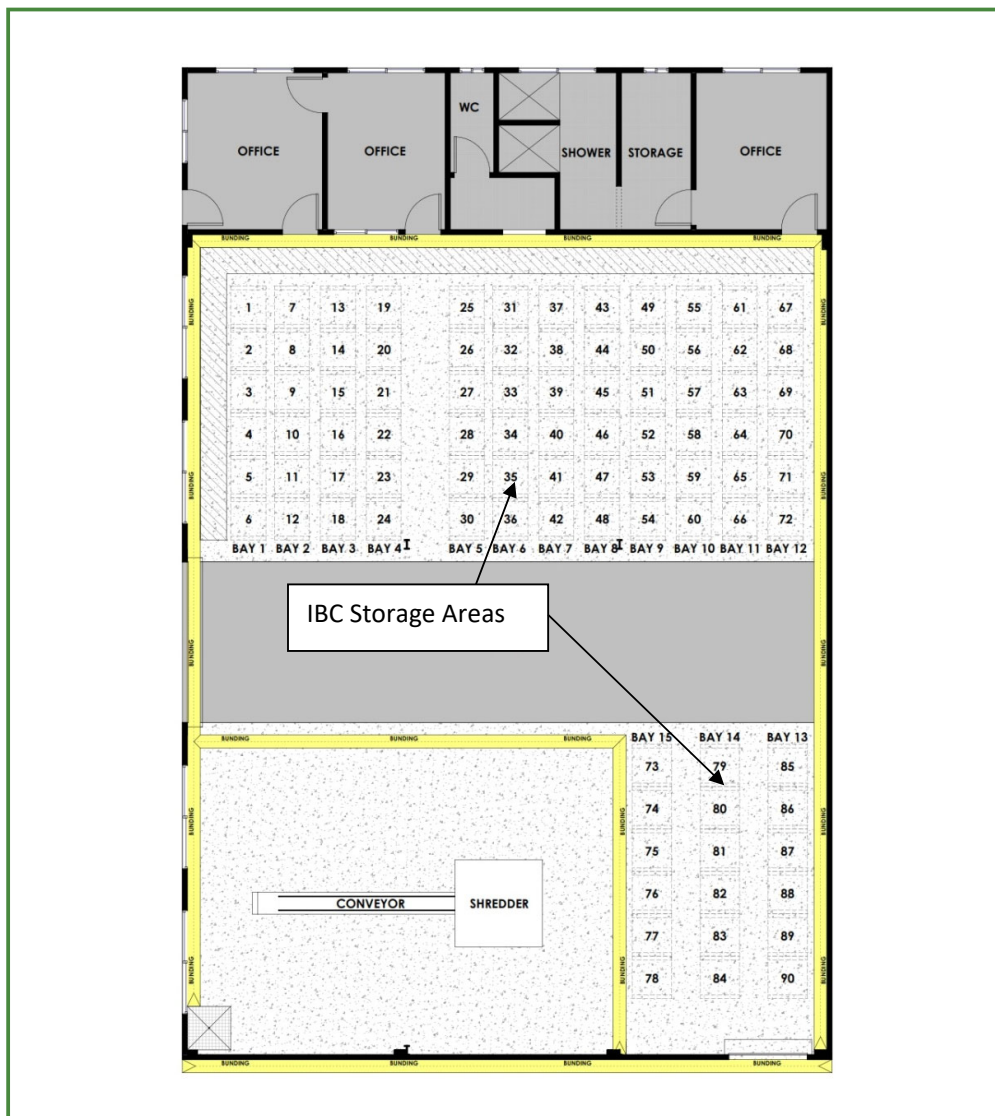
Figure 2-2: Process diagram of liquid product waste destruction



IBCs containing liquids transferred from 16 Kiora Crescent to 14 Kiora Crescent for further processing are delivered via forklift. The transit path is over the hardstand area in front of the buildings. The quantity of waste transferred is a maximum of 1,100 tpa which is an average of 3 IBCs per day.

The floorplan for 16 Kiora Crescent is shown below in Figure 2-3.

Figure 2-3: Proposed floor plan for product destruction processes at 16 Kiara Crescent



## 2.2 MITIGATION MEASURES

Mitigation measures for air and odour include:

- Biotrickling filter system;
- Vertical dispersion stack, 6 m above roofline;
- Indoor operations; and
- Deodoriser.

These are described in the following sub-sections.

### 2.2.1 Biotrickling filter system

All displaced air from tank filling is vented through an existing biotrickling filter (supplied by Gebel Tanks). The biotrickling filter system uses a packed bed consisting of porous material that bacteria



affix to and create a biomass film, this film degrades pollutants that are transferred to the packed bed as the air/gas is transported through the material.

The biotrickling filter system is maintained by Enviro Waste. This is undertaken on a regular basis and includes system checks and replacement of filters as follows:

- System checks of temperature and pH. Temperature should be kept between 15°C and 45°C, with optimum temperature between 30°C and 35°C. pH should be maintained between 7-8. pH adjustments are undertaken daily as necessary.
- Replacement of filters is undertaken as per manufacturer's specifications.

If parameters are not met, the maintenance contractor must be contacted to check the system and provide any required servicing. Any maintenance works are to be recorded.

### **2.2.2 Stack**

From the biotrickling system the site discharges the filtered air vertically through a stack 6m above the roofline.

### **2.2.3 Building**

All liquid waste handling occurs within the building, reducing odour impacts from fugitive emissions.

### **2.2.4 Deodoriser**

There are 5 existing deodoriser spray points in the facility. Two are positioned at the top of the front roller door and spray inwards, two more in on the back wall of the facility pointed towards the filtering/screening process, and one positioned directly above the DAF plant.

The deodoriser system sprays every 15 minutes.

### 3. STATUTORY REQUIREMENTS

#### 3.1 AIR QUALITY CRITERIA AND GUIDELINES

The following legislation applies to the development in relation to air and odour.

##### 3.1.1 Protection of the Environment Operations Act 1997

The *Protection of the Environment Operations Act 1997* (POEO Act) applies the following definitions relating to air pollution:

*“Air pollution” means the emission into the air of any air impurity.*

*While “air impurity” includes smoke, dust (including fly ash), cinders, solid particles of any kind, gases, fumes, mists odours, and radioactive substances*

##### 3.1.2 Protection of Environment Operations (Clean Air) Regulation 2021

In accordance with Part 5 of the *Protection of the Environment Operations (Clean Air) Regulation 2021* (herein referred to as the Clean Air Regulation 2021), the activities and plant would belong to Group 6 (Standards for scheduled premises) as it is to be *commenced to be carried on, or to operate, on or after 1 September 2005 as a result of an environment protection licence granted under the Protection of the Environment Operations Act 1997 pursuant to an application made on or after 1 September 2005.*

Schedule 4 of the Clean Air Regulation 2021 provides standards of concentration for scheduled premises for general activities and plant. Schedule 4 does not list any standards of concentration for emissions relating to the site.

##### 3.1.3 NSW Environment Protection Authority Guidelines

The document, *“Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales”* (AMMAAP) published by the NSW Environment Protection Authority (NSW EPA) provides guidance on methodology and thresholds that are to be used for the impact assessment of air emissions from developments.

The identified emissions from the site are odour and VOCs (xylene and benzene).

This odour impact criteria has been summarised in Table 3-1.

Table 3-1: Relevant odour impact criteria from the Approved Methods for Modelling and Assessment of Air Pollutants in New South Wales (2016)

Size of Affected Community	Odour Performance Criteria (Odour Units) (to be complied with for 99.0% of the time)
Urban (Population $\geq \approx 2000$ )	2.0 OU/m <sup>3</sup>
Population $\approx 500$	3.0 OU/m <sup>3</sup>
Population $\approx 125$	4.0 OU/m <sup>3</sup>
Population $\approx 30$	5.0 OU/m <sup>3</sup>
Population $\approx 10$	6.0 OU/m <sup>3</sup>
Single residence ( $\leq \approx 2$ )	7.0 OU/m <sup>3</sup>

The Approved Methods provides the following formula to determine the appropriate impact assessment criteria for complex mixtures of odorous air pollutants:

$$\text{Impact Assessment Criteria (OU)} = [\log_{10}(\text{population}) - 4.5] / -0.6$$

The affected community is based on the population within the 2 OU contour. An Air Quality Impact Assessment was conducted and found the applicable criteria to be **7 OU**.

The VOC criterion is described in Table 3-2 below.

Table 3-2: Relevant VOC criteria from the Approved Methods for Modelling and Assessment of Air Pollutants in New South Wales (2016)

VOC	Applicable Criteria	Location Criteria Applies	Averaging Period
Xylene	0.19 mg/m <sup>3</sup>	At the nearest sensitive receptor	1 hr
Benzene	0.029 mg/m <sup>3</sup>	At and beyond the boundary of the facility	1 hr

### 3.2 KEY PERFORMANCE INDICATORS

The objective of this AQOMP is to minimise the impacts of the site operations on local air quality. Mitigation measures implemented in order to achieve this objective are detailed in Section 2.2. Key performance indicators associated with the performance of the site are provided in Table 3-3.

Table 3-3: Key Performance Indicators

Measure	Target	Timing	Responsibility	Documentation
Meet relevant air quality criteria	Comply with development consent and POEO Act (See section 3.1)	Checked 6 months after commencement of operations and/or in response to odour complaint.	General Manager	Odour Audit and/or Odour Compliance Report
Odour Complaints	Zero complaints	Ongoing	General Manager	Complaints register
Offensive Odour Emissions	No offensive odour beyond boundary (Intensity Rank <3)	Monthly	General Manager	Monthly odour monitoring checklist*
Biotrickling Filter System - Temperature	Between 15°C - 45°C	Daily monitoring	Operations Manager	Maintenance records
Biotrickling Filter System - pH	7-8	Daily monitoring	Operations Manager	Maintenance records

\*An in-house odour monitoring procedure and checklist are provided in Section 5.2.2.

### 3.3 APPROVALS, LICENCES AND LEASES

#### 3.3.1 Development Consent Conditions

Consent conditions under SSD-10407 specific to air and odour are provided in the following table.

Table 3-4: Project Approval SSD-10407: Requirements for air and odour

Condition	Requirement	Relevant Section
B18	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	2.2
B19	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	3
B20	All tanks must vent to the biotrickling filter system and the air discharged from the biotrickling filter must be exhausted through the stack 6 m above the roofline. The biotrickling filter system stack must have a compliant sampling plane in accordance with AS4323.1-1995.	5
B23	The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	5.2



Table 3-4: Project Approval SSD-10407: Requirements for air and odour

Condition	Requirement	Relevant Section
B24	<p>The Applicant must carry out an Odour Audit of the development no later than six months after the commencement of operation of the development. Division 9.4 of Part 9 of the EP&amp;A Act applies to this audit which is for the purpose of auditing the development against the odour impact predictions of the development. The audit must:</p> <ul style="list-style-type: none"> <li>(a) be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Planning Secretary;</li> <li>(b) audit the development in full operation;</li> <li>(c) include a summary of odour complaints and any actions that were carried out to address the complaints;</li> <li>(d) assess the operation against odour impact predictions in the EIS and RtS;</li> <li>(e) review design and management practices in the development against industry best practice for odour management; and</li> <li>(f) include an action plan that identifies and prioritises any odour mitigation measures that may be necessary to reduce odour emissions.</li> </ul>	Addressed in Section 4.3.2 of the OEMP
B25	<p>Within six months of commissioning of the Odour Audit required by Condition B24, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the Odour Audit report to the satisfaction of the Planning Secretary, together with the Applicant's response to any recommendations contained in the Odour Audit report.</p>	Addressed in Section 2.3.1.3 of the OEMP

### 3.3.2 EPL Conditions

The EPL conditions specific to air and odour are stipulated in the table below.

Table 3-5: EPL requirements

Condition	Requirement															
L2	<b>Concentration Limits</b>															
L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.															
L2.2	<div>Air Concentration Limits POINT 1</div> <table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th></tr><tr><td>Benzene</td><td>milligrams per cubic metre</td><td>1</td><td>Dry, 273 K, 101.3 kPa</td><td></td></tr><tr><td>volatile organic compounds as n-propane equivalent</td><td>milligrams per cubic metre</td><td>40</td><td>Dry, 273 K, 101.3 kPa</td><td></td></tr></table>	Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Benzene	milligrams per cubic metre	1	Dry, 273 K, 101.3 kPa		volatile organic compounds as n-propane equivalent	milligrams per cubic metre	40	Dry, 273 K, 101.3 kPa	
Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction												
Benzene	milligrams per cubic metre	1	Dry, 273 K, 101.3 kPa													
volatile organic compounds as n-propane equivalent	milligrams per cubic metre	40	Dry, 273 K, 101.3 kPa													
L6	<b>Potentially Offensive Odour</b>															
L6.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.															
L6.2	No condition of this licence identifies a potentially offensive odour for the purpose of the section 129 of the Protection of the Environment Operations Act 1997.															
O4	<b>Processes and Management</b>															
O4.5	All liquid waste must be received and treated in an enclosed building with roller doors.															
O4.7	All tanks must vent to the biotrickling filter system and the air discharged from the biotrickling filter must be exhausted through a stack 6 m above the roofline															
O4.8	The biotrickling filter system stack must have a compliant sampling plane in accordance with AS4323.1-1995.															
M2	<b>Requirement to monitor concentration of pollutants discharged</b>															
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutants specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:															
M2.2	<div>Air Monitoring Requirements POINT 1</div> <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Benzene</td><td>micrograms per cubic metre</td><td>Yearly</td><td>TM-34</td></tr><tr><td>volatile organic compounds as n-propane equivalent</td><td>micrograms per cubic metre</td><td>Yearly</td><td>TM-34</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Benzene	micrograms per cubic metre	Yearly	TM-34	volatile organic compounds as n-propane equivalent	micrograms per cubic metre	Yearly	TM-34			
Pollutant	Units of measure	Frequency	Sampling Method													
Benzene	micrograms per cubic metre	Yearly	TM-34													
volatile organic compounds as n-propane equivalent	micrograms per cubic metre	Yearly	TM-34													

Table 3-5: EPL requirements

Condition	Requirement
M3	<b>Testing methods – concentration limits</b>
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.
M4	<b>Recording of Pollution Complaints</b>

The following Air Concentration Limits and Air Monitoring Requirements will be adhered to.

#### Air Monitoring Requirements

Table 3-6: M2.2 Air

EPA ID	Pollutant	Unit of Measure	Frequency	Sampling Method
POINT 1	Benzene	Milligrams per cubic metre	Yearly	TM-34
	Volatile Organic Compounds as n-propane equivalent	Milligrams per cubic metre	Yearly	TM-34

#### Limit Conditions

Table 3-7: L2.2 Air concentration limits

Pollutant	Units of Measure	100 percentile concentrations limit	Reference conditions	Oxygen correction	Averaging Period
Benzene	Milligrams per cubic metre	1	Dry, 273 K, 101.3 kPa		1 hour
VOCs (as n-propane)	Milligrams per cubic metre	40	Dry, 273 K, 101.3 kPa		1 hour

## 4. EMISSIONS SOURCES

Potential sources of emissions to air include:

- Volatile Organic Compounds (VOCs) and benzene during liquid waste handling and transfer. Potentially hazardous chemical compounds are vented through a biotrickling filter that degrades these compounds before being emitted to air.

There are three points of odour emission that are identified in the recycling process:

- Solids filter during periods it is opened for cleaning;
- Biotrickling filter (BTF) system vent/stack; and
- Dissolved Air Floatation (DAF) treatment tank.

## 5. COMPLIANCE MONITORING PROGRAM

The compliance monitoring program is a program to monitor and report on the:

- (i) impacts and environmental performance of the development; and
- (ii) effectiveness of the management measures set out.

### 5.1 AIR QUALITY

The WH&S Manager shall be responsible for ensuring annual air emissions monitoring is undertaken on the biotrickling filter system stack as per EPL 20444. The stack is required to be monitored for benzene and Volatile Organic Compounds (VOCs) as n-propane.

Air Emission Monitoring (Stack Testing)

EPL Conditions L2.2 & M2.2

Point 1: Biotrickling filter system stack

Frequency: Annually

Due: TBA

Stack testing to be undertaken by a suitably qualified consultant in accordance with Air Emission Management Plan and Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, and relevant requirements.

The following from the EPL will be adhered to with regards to monitoring:

Pollutant	Units of Measure	Frequency	Sampling Method
Benzene	Milligrams per cubic metre	Yearly	TM-34
VOCs (as n-propane)	Milligrams per cubic metre	Yearly	TM-34

Benzene and VOCS (as n-propane) from the development should be tested for annually at the biotrickling filter vent stack for 14 Kiora Crescent The TM-34 (USEPA (2000)) sampling method should be utilised to test for the pollutants as referred to in the Approved Methods.

The pollutants should be tested against the following limits:

Table 5-1: L2.2 Air concentration limits

Pollutant	Units of Measure	100 percentile concentrations limit	Reference conditions	Oxygen correction	Averaging Period
Benzene	Milligrams per cubic metre	1	Dry, 273 K, 101.3 kPa		1 hour
VOCs (as n-propane)	Milligrams per cubic metre	40	Dry, 273 K, 101.3 kPa		1 hour

The sampling plan is to be prepared in accordance with AS4323.1-1995 and the results analysed by a NATA accredited laboratory. The results should be presented in a brief report and any exceedances investigated and addressed.

## 5.2 ODOUR

### 5.2.1 Odour Audit

A separate odour audit will be undertaken to monitor odour impacts from the development no later than 6 months after commencement of operation of the development in accordance with Condition B24 of consent SSD-10407.

The objective of the odour audit is to audit the development against the odour impact predictions of the development.

To assess compliance with odour impact predictions, odour sampling is required.

Odour concentration measurements should be performed using dynamic olfactometry according to the Australian/New Zealand Standard: Stationary source emissions – *Part 3: Determination of odour concentration by dynamic olfactometry* (AS/NZS4323.3) by a NATA accredited laboratory.

Odour monitoring should be conducted during the transfer of liquid sewage waste from a tanker truck. The sampling should be conducted at 3 locations: the stack, box filter (while operating) and DAF (while operating). If odour concentrations are below the odour concentrations presented in Table 5-2 below the site is in compliance. If they exceed this concentration, additional odour modelling is required to assess compliance in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales 2016.

Table 5-2: Odour Audit Concentrations

Location	Max Odour Concentration Modelled*
Stack	9,740 OU
Box Filter	2,660 OU
DAF	2,050 OU

**\*Note:** These are the maximum odour concentrations utilised in the air quality assessment Ref: 191251\_AQIA\_Rev5. Utilising these concentrations ground level concentrations were found to be in compliance with the approved methods.

Additional mitigation measures that would be considered should odour problems occur include:

- Additional in-line pollution control devices such as activated carbon filters and/or additional biotrickling filters.
- Air extraction registers near fugitive sources could be installed. These could then be ducted through additional pollution control devices.

## 5.2.2 Odour Monitoring

Quarterly odour monitoring will enable assessment of the effectiveness of all implemented mitigation measures. The objective is to ensure no offensive odours from the site are present at and beyond the site boundary. Monitoring will also be undertaken in the event of complaints.

### 5.2.2.1 Monitoring Locations

Three (3) locations along the site boundary should be monitored at least once a month, or where unexpected or abnormal odour emissions are being generated.

Locations are on the boundary of the site and nearest to potentially impacted receptors (located north and north-east of the site). Prevailing winds emanating from the south and south-east would represent worst case air impacts off site, as winds tending from these directions will pass over the development towards the nearest identified receptors.

It is recommended that odour monitoring be undertaken during optimal meteorological conditions (low wind speeds) and during peak odour generating site activities to monitor during worst case odour emissions. Where possible, this should be during the day period when temperatures are highest. Odour monitoring should not be undertaken during rain events or strong windy conditions.

The suggested odour monitoring locations are shown in Figure 5-1.

### 5.2.2.2 Recording Odour Results

To record odour, complete the following:

STEP 1: Using the German Standard VDI 3882 Part 1 odour intensity scale provided below, record the odour intensity every 30 seconds over a 10 minute period.

(It is important to note that it is very easy to become desensitised to odour. Avoiding odorous areas before commencing the assessment is essential. Additionally, the nose must be held closed for the 30 seconds between samples)

STEP 2: Enter the highest intensity rank experienced during the 10 minute period into the record table overleaf. Odour needs to be observed monthly.

STEP 3: When an odour intensity of 3–6 is experienced, corrective action is required.

#### GERMAN VDI 3882 Odour Intensity Scale

Odour Intensity	Intensity Rank (Code)
Extremely strong	6
Very strong	5
Strong	4
Distinct	3
Weak	2
Very weak	1
Not perceptible	0



[illegible]






### 5.2.2.3 Interpretation of Results

Where an intensity rank result is 3 or higher, engagement of an air quality professional is needed to undertake an odour compliance assessment and for advice on additional mitigation measures that may be required to be implemented.

Figure 5-1: Monitoring Locations – 14-16 Kiora Crescent, Yennora



Source: NSW Planning Portal

 Not to scale	<b>LEGEND:</b>  Site Boundary  Odour Monitoring Point  Air Monitoring Point (Biotrickling Filter Stack)	 Benbow Environmental 25-27 Sherwood Street, Northmead NSW 2152
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## 6. REPORTING PROTOCOL

This reporting protocol is to be used to manage and report any:

- Incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);
- complaint;
- failure to comply with statutory requirements; and a protocol for periodic review of the plan.

Personnel responsible to action investigations and/or corrective measures, should performance issues be identified, or odour complaints occur are:

Name	Position	Mobile
Eddy Hawach	Managing Director	0420 511 727
Simon Saba	General Manager	0467 777 646
John Paul Hawach	Operations Manager	0405 583 332

Following the annual sampling a brief report will be written and any non-compliance highlighted. If there is a non-compliance an air quality audit will be undertaken to determine the reason for the non-compliance.

Any issues or non-conformances noted during workplace inspections must be recorded. The incident report form must be filled in, along with the odour monitoring record. These events must be recorded in the register. Documentation for any corrective and preventative actions must also be maintained, as described below.

Records of the regular site inspections, incidents and complaints need to be maintained and archived (as required by the regulatory authority). Any other relevant records must also be kept for inspection by regulatory authorities.

### 6.1 COMPLAINTS PROCEDURE

If there is an odour complaint, odour monitoring, as described below is to be undertaken immediately at the monitoring location shown in Section 5.2 by the assigned environmental officer, as well as at the location of the complaint (where possible).

Odour complaints are to be dealt with as per the Complaints Procedure detailed within the OEMP. The complaints response form (provided overleaf for convenience) within this procedure includes all manner of potential environmental harm issues (including odour) that may cause nuisance at the nearest sensitive receivers.

The incident report form and complaints response form below must be filled in, along with the odour monitoring record. These events must be recorded in the register. The air quality and odour control measures should be confirmed that they are in place and maintained and any source of excessive odour emissions or poor air quality identified and stopped.



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<b>NO:</b>	<b>F6.2</b>	<b>DATE:</b>	<b>April 22</b>
<b>PREPARED BY:</b>	Benbow Environmental	<b>ISSUE NO.:</b>	<b>1</b>
<b>SUBJECT:</b>	<b>6.2 INCIDENT REPORT FORM</b>		

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<b>INCIDENT REPORTING – BASIC FACTS</b>	<b>FORM</b>
---	-------------

---

Date & Time of Incident: .....

Site Address: .....

Reference No. ....

---

**Expected cause, duration & specific location of the event/incident:**

---

The type, volume and concentration (if known) of odorous materials that escaped as a result of the incident:

---

Immediate action taken in relation to the event:

---

Key performance indicators checked (Note results here):

---

The name, address and telephone number of any witnesses of the event:

---

Any other relevant matters:

---

I verify that all the information provided herein is a true and accurate of the events that have occurred.

Signed: .....

Name: .....

Date: .....



INCIDENT REPORTING			REGISTER
Date	Reference No.*	Nature & cause of the incident	Verification of corrective / preventative actions
			I verify that all the nominated corrective and preventative actions have been implemented effectively. Signed:..... Name: ..... Date: .....
			I verify that all the nominated corrective and preventative actions have been implemented effectively. Signed:..... Name: ..... Date: .....
			I verify that all the nominated corrective and preventative actions have been implemented effectively. Signed:..... Name: ..... Date: .....
			I verify that all the nominated corrective and preventative actions have been implemented effectively. Signed:..... Name: ..... Date: .....
			I verify that all the nominated corrective and preventative actions have been implemented effectively. Signed:..... Name: ..... Date: .....
			I verify that all the nominated corrective and preventative actions have been implemented effectively. Signed:..... Name: ..... Date: .....

\* The reference number quoted would reference related incident reports with details of each incident.



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<b>NO:</b>	<b>EP6.3</b>	<b>DATE:</b>	<b>April 22</b>
<b>PREPARED BY:</b>	Benbow Environmental	<b>ISSUE NO.:</b>	<b>1</b>
<b>SUBJECT:</b>	<b>6.3 COMPLAINTS RESPONSE FORM</b>		

---

REF: .....

REV: 1

LOG BOOK REFERENCE NO: .....

DATE: .....TIME: .....AM/PM

NAME OF PERSON WHO RECEIVED CALL: .....

NAME OF COMPLAINANT: .....TELEPHONE NO: .....

ADDRESS: .....

---

**DETAILS OF COMPLAINT:**

DATE OF OCCURANCE: .....TIME AM/PM: .....

**TYPE OF INCIDENT:**

NOISE ☐

STORMWATER ☐

AIR EMISSIONS ☐

ODOUR ☐

TRAFFIC/TRANSPORT ☐

FIRE ☐

EROSION/SEDIMENT ☐

WASTE ☐

OTHER ☐ DETAILS: .....

PRECISE LOCATION OF INCIDENT: .....

PARTICULAR DETAILS RELATING TO THE INCIDENT: .....

.....

.....



**COMPLAINTS RESPONSE FORM**

**PAGE 2 OF 2**

**ACTION TAKEN:**

COMPLAINANT TRANSFERRED TO:

MESSAGE TAKEN FOR: .....

**CORRECTIVE AND PREVENTATIVE ACTION:**

INFORMATION BULLETIN SENT

☐

COMPLAINT INVESTIGATED BY: .....CPAR NO.....

RESULTS OF INVESTIGATION: .....

.....

.....

.....

ON COMPLETION OF CORRECTIVE AND PREVENTATIVE ACTION:

LETTER SENT TO COMPLAINANT                      YES      NO      N/A      DATE: .....

WORK PRACTICE MODIFIED                      YES      NO      N/A      DATE: .....

**COMPLAINT RESPONSE COMPLETE:** .....

PRINT NAME

SIGNATURE: .....

DATE: .....

TIME: .....AM/PM



[illegible]



**NO:** EP6.4 **DATE:** April 22  
**PREPARED BY:** Benbow Environmental **ISSUE NO.:** 1  
**SUBJECT:** **6.4 CORRECTIVE & PREVENTATIVE ACTION FORM**

REF: .....

REV: 1

☐

CORRECTIVE ACTION

☐

PREVENTATIVE ACTION

Name of personnel requesting  
corrective/preventative action:

Signature:

.....

.....

Personnel responsible for action:

Date:

.....

.....

Outline of the 'Initiating Event' and necessary corrective and/or preventative actions (to be filled out by those requesting action):

.....  
.....  
.....  
.....

Actions taken to fulfil the requirement of the corrective and/or preventative action:

.....  
.....  
.....  
.....

**Corrective and/or preventative action complete:**

**Signature:** .....

**Date:** .....

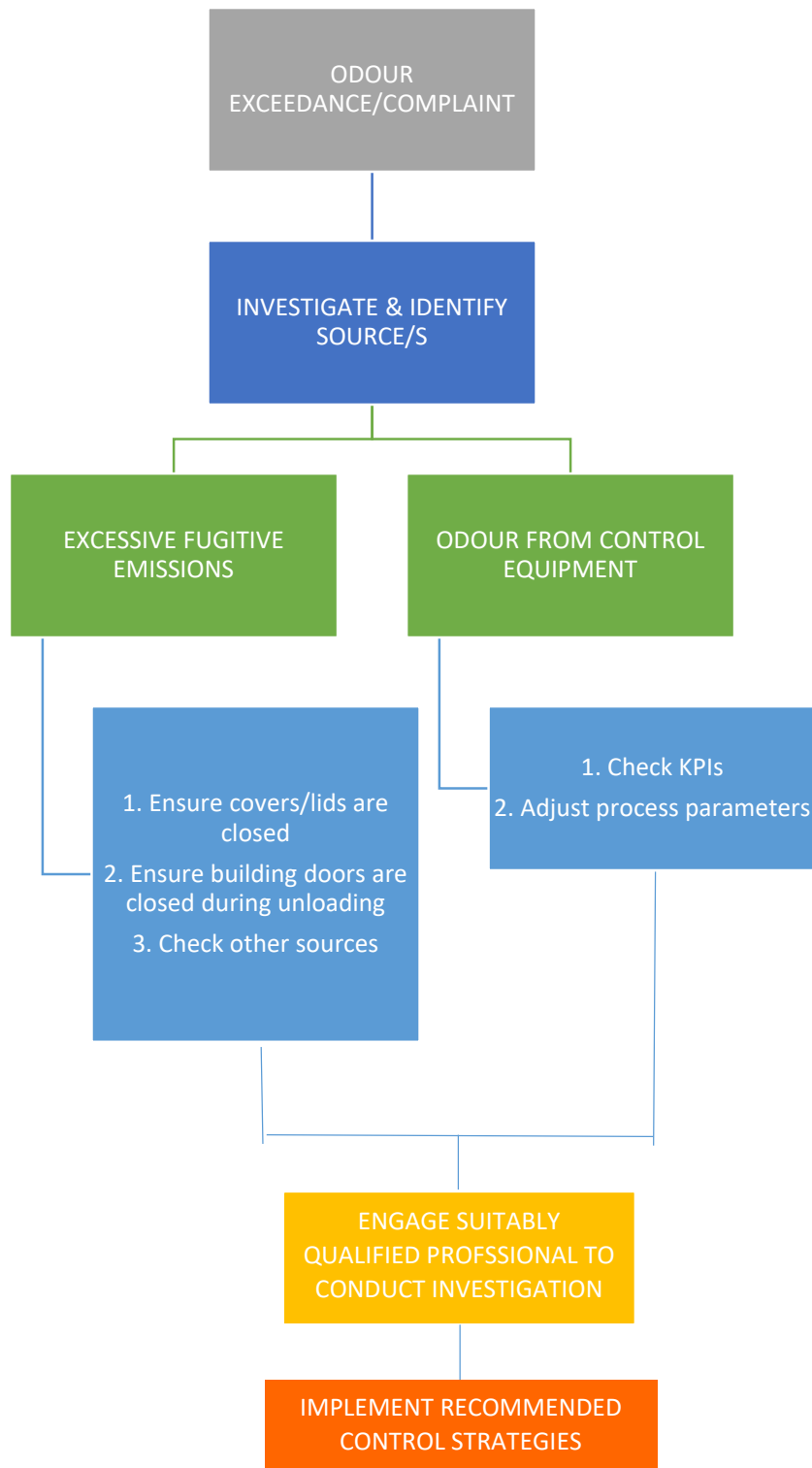
## 7. CONTINGENCY PLAN

Contingencies to manage any unpredicted impacts and their consequences would ensure levels are reduced below relevant impact criteria as quickly as possible.

This plan is triggered under the following circumstances:

- When an odour complaint is received;
- An exceedance of relevant criteria (see Section 3.1) during scheduled odour sampling for the odour audit;
- An intensity rank of >3 is recorded for the 10 minute period during the monthly odour monitoring (See section 5.2.2);
- Operational failure of control equipment.

The protocol to follow is set out below:





## **7.1 ADDITIONAL CONTROL STRATEGIES**

Additional mitigation measures that would be considered should odour problems occur include:

- Additional in-line pollution control devices such as activated carbon filters and/or additional biotrickling filters.
- Air extraction registers near fugitive sources could be installed. These could then be ducted through additional pollution control devices.

The need to implement these control measures would be determined following a full investigation triggered by an exceedance or complaint.



## **8. ENVIRONMENTAL PERFORMANCE IMPROVEMENT AND INVESTIGATION**

This AQOMP facilitates continual improvement of the site operations in implementing the “Plan, do, check and act” model as follows:

- Plan: Identify opportunities and plan for change – through the perpetual review provision and annual monitoring.
- Do: implement the change – through the preventative and corrective actions process.
- Check: Use data to analyse the results of the change and determine whether it made a difference – through the monitoring and review process.
- Act: If the change was successful, implement it on a larger scale

## 9. PERPETUAL REVIEW PROVISION

To ensure ongoing environmental performance of the development, this AQOMP may require updating on a regular basis.

It is recommended that the plan AQOMP is reviewed by a suitably qualified environmental professional.

This AQOMP and the strategies and programs it contains must be reviewed within every three (3) months of the following:

- (a) the submission of a Compliance Report;
- (b) the submission of an incident report;
- (c) the submission of an Independent Audit;
- (d) the approval of any modification of the conditions of the consent; or the issue of a direction of the Planning Secretary which requires a review.

The Planning Secretary must be notified in writing that a review is being carried out.

Further reviews may be required under this consent may be required whenever it may be necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction.

Where revisions are required, they must be revised to satisfy the Planning Secretary the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.



## 10. CONCLUDING REMARKS

The control measures outlined in this Air Quality and Odour Management Plan (AQOMP) have been provided as guidance to reduce any potential air quality and odour impacts from the Liquid Waste Treatment Plant located at 14-16 Kiora Crescent, Yennora.

The mitigation measures recommended in this AQOMP are considered adequate at controlling or minimising air quality impacts and odour from the site.

This concludes the AQOMP.



Victoria Hale  
Senior Environmental Scientist



Kate Barker  
Senior Environmental Scientist



Linda Zanotto  
Senior Environmental Engineer



R T Benbow  
Principal Consultant



## 11. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of Enviro Waste Services Group Pty Ltd, as per our agreement for providing environmental services. Only Enviro Waste Services Group Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by Enviro Waste Services Group Pty Ltd for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

## **ATTACHMENTS**



**From:** Sean Nunan <Sean.Nunan@epa.nsw.gov.au>  
**Sent:** Thursday, 7 April 2022 1:37 PM  
**To:** Linda Zanotto  
**Cc:** James Boyle  
**Subject:** FW: Enviro Waste Services Group Pty Ltd - EPL20444 - Review of Air Quality and Odour Management Plan 2022

Hi Linda,

The EPA has reviewed the Air quality and Odour Management Plan (AQOMP), 14-16 Kiora Crescent, Yennora NSW – Enviro waste services, prepared by Benbow Environmental, dated 11 January 2022.

The EPA considers it has been consulted in line with the Project Approval SSD-10407 – Schedule 2, Part B, Conditions B21, however the EPA requests that the AQOMP is revised in line with the comments below.

### **Purpose of the advice**

The EPA's review of the Air Quality and Odour Management Plan (AQOMP) does not constitute approval or infer that the Air quality and odour management plan, and their implementation, will result in compliance with the *Protection of the Environment Operations Act 1997* or conditions of the corresponding Environment Protection Licences (EPL).

### **General Advice on Air Quality and Odour Management Plans**

Air quality and Odour management plans are considered to be a tool for the licensee to use as a framework for ensuring operational management is appropriately implemented and regulatory obligations are being fulfilled. A robust management system which incorporates both proactive and reactive measures should be used to effectively manage emissions.

### **Review of the Air quality and Odour management plan**

The EPA considers that the plan broadly covers the recommended framework. At a high level, the overall approach in the management plan minimises the risk of off-site impacts, however, the plan needs to be revised to address the deficiencies below and strengthen the quality and auditability of the plan.

#### **1. Performance indicators**

The plan specifies periodic VOCs and Benzene emissions monitoring will be undertaken. However, the licensee has not specified clear key performance indicators or key targets to demonstrate that various parts of their operation will be operated and maintained in a proper and efficient manner on an ongoing basis. For instance, it should be noted that the plan does not include clear measures for routine and non-routine inspections and maintenance of the odour control equipment, including the biotrickling filter. This is of particular interest, given this is one of the main controls identified to reduce the risk of off-site impacts.

Further, monitoring and recording key performance indicators can complement the complaint investigations. As such, this type of information should also be included in the incident reporting sheet.

#### **2. Odour**

The plan indicates that an odour audit will be undertaken within 6 months of commencing operations. The plan does not, however, include the objective of the odour audit nor does it include clear criteria to determine the need for additional steps, including the implementation of supplementary mitigation measures.

The plan does not mention additional mitigation options that could be implemented should odour problems occur once operating at the increased capacity. Nonetheless, it is noted that in their response to submissions, the proponent identified additional in-line pollution control devices such as activated carbon filters and biotrickling filters and air extraction at fugitive sources.

#### **3. Additional considerations**

As previously indicated, the plan lacks measurable and auditable information. As such, it is considered that the plan needs to be revised by including:

- Process parameters that can be continuously monitored and recorded to ensure that the plant and controls are maintained and operated in a proper and efficient manner on an ongoing basis.
- Process parameters which are monitored and recorded by the Licensee for the purposes of ensuring that air emissions and odour testing is undertaken at representative operating conditions and ranges.
- The QA/QC measures implemented by the Licensee to verify test results provided by the contractor.
- The criteria developed by the Licensee to review and approve the monitoring reports provided by the contractor.
- Verification measures and 'pre-determined indicators' used for evaluating the on-going performance and operational efficiency of the control equipment. Clear action against each identified 'pre-determined indicators'
- Specific response mechanisms or contingency strategies to address system or operational failures, including those for the emissions controls.
- The personnel responsible to action investigations and/or corrective measures, should performance issues be identified, or odour complaints occur.
- Incident reporting sheets that includes the plant and controls key performance indicators to be checked when investigating complaints.
- Additional control strategies, including engineering controls specified in the Response to Submissions – Yennora Liquid Waste Treatment Plant, Benbow Environmental, February 2021

Please advise the EPA in writing when the AQOMP will be revised as requested above.

Regards

Sean

**Sean Nunan**

Operations Officer  
Regulatory Operations Metro South  
NSW Environment Protection Authority

D 02 9995 5977 | E [sean.nunan@epa.nsw.gov.au](mailto:sean.nunan@epa.nsw.gov.au)



[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au) @NSW\_EPA

*The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.*

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

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