

## 10 STATEMENT OF COMMITMENTS

This section summarises the mitigation measures to be implemented at the proposed development to reduce impacts to the surrounding environment.

### 10.1 Statement of Commitments

The mitigation measures, monitoring activities, and management strategies outlined in **Section 9** above will be implemented for all activities associated with the proposed facility. **Table 48** below details the key commitments proposed in this EIS to effectively mitigate and manage the potential environmental impacts of the development.

**Table 48 Draft Statement of Commitments**

Summary of Commitments	Where Addressed in the EIS
<b>General</b>	
<ul style="list-style-type: none"> <li>A site-specific Compost Management Plan (CMP) has been developed for the waste facility. The CMP ensures that the commitments made within the EIS are fully implemented and complied with. The CMP is attached as <b>Appendix Q</b>.</li> </ul>	<b>Q</b>
<b>Air Quality (including greenhouse gas, odour and dust)</b>	
<ul style="list-style-type: none"> <li>The potential for odour related impacts to off-site receptors will be managed through the adopted odour reduction measures that form part of the site's Composting Management Plan (CMP) (LZE, 2016). In particular Section 11.1.2 <i>Odour Management</i>, Section 11.2.1 <i>Stormwater Management</i>, Section 11.2.2 <i>Basin Water Health and Management</i>, and Section 12. <i>Management Procedures</i>, of the CMP (LZE, 2016) include references to odour management strategies to be implemented on site as/if required to minimise the potential for off-site odour impacts.</li> <li>The potential for dust related impacts to off-site receptors will be managed through the adopted dust reduction measures that form part of the site's Composting Management Plan (CMP) (LZE, 2016). In particular it is noted that Section 11.1.1 <i>Dust and Particulate Management</i>, Section 12.4.2.4 <i>Hardstand Pads</i> and Section 12. <i>Management Procedures</i>, of the CMP (LZE, 2016) include references to dust management strategies to be implemented on site as/if required to minimise the potential for off-site dust impacts.</li> <li>Use of building materials for walls, floors, roofs, that provide insulation and aid in reduced energy costs;</li> <li>Maximisation of natural ventilation and energy efficient cooling;</li> <li>Use of natural lighting;</li> <li>Use of light sensors to minimise lighting related electricity usage;</li> <li>Use of high efficiency lighting;</li> <li>Whenever practicable, vehicles to leave site with full loads to reduce the number of traffic movements and diesel consumption; and</li> <li>All vehicles/plant and machinery will be turned off when not in use and regularly serviced in accordance with manufacturers specifications to ensure efficient operation.</li> </ul>	<b>9.1</b>

### Surface Water and Ground Water

**9.2 and 9.3**

- Surface and Groundwater Management Plan to be updated to include the expanded facility
- Limit fuels and chemicals stored onsite to a minimum
- All required chemicals and fuels must be located within a bunded enclosure located away from drainage lines and stormwater drains
- Plant and equipment must be regularly inspected and serviced to limit risk of oil loss
- Refuelling of vehicles or machinery is to occur within a containment or hardstand area designed to prevent the escape of spilled substances to the surrounding environment
- Wash down areas must be appropriately constructed to capture and treat all wastewater, with collected solid material disposed off-site to a licensed facility
- All staff to be appropriately trained in the spill response plan for the minimisation and management of unintended spills
- A high standard of site housekeeping is to be maintained to limit risk of gross pollutants entering surface waters (i.e. construction waste, litter)
- All reasonable and practicable measures must be taken to prevent pollution of any existing waterways as a result of silt or untreated leachate run-off, and oil or grease spills from any machinery. Wastewater for cleaning equipment must not be discharged or indirectly to any watercourses or stormwater systems
- Exposed bare earth areas within the composting facility site must be minimised. Unused areas are to be revegetated
- The facility must be designed to prevent surface water from mixing with the organics received and processed at the premises and the final products, process residuals and contaminated materials stored at the premises. This includes:
  - Drains and spillways
  - Bunding
  - Sediment controls during construction
- Clean stormwater must be diverted around waste and leachate catchments through the installation of clean water catch drains and diversion bunds
- Maintain surface gradient of the hardstand pad and orientation/geometry of windrows to minimise leachate generation and to ensure that leachate flows directly to the primary detention basin without mixing with compost organics
- Maintain all water related infrastructure, during construction and operation of expanded infrastructure, and operation, designed to maximise runoff and reduce infiltration including:
  - Low permeability base in the composting processing areas
  - Lining of the leachate dams
  - Bunding and arrangement of windrows
  - Perimeter bunding and diversion drains
- Procedures for testing, treatment and discharge of leachate to be established and implemented, including monitoring anaerobic conditions

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- Undertake aeration of the leachate dam (increase oxygen) if required (i.e. if hydrogen sulphide, dissolved oxygen or pH levels are outside limits)
- Monitor water levels of the detention basin to ensure that the water levels do not drop below the anticipated use of water for composting and evaporation.
- Maintain integrity of hardstand pad by repairs to areas damaged by plant and machinery movements
- Ensure drains and surface water gradients are free of excess vegetation and debris so that the flow of stormwater or leachate is not impeded, and the moisture / compaction levels achieved in embankment construction are maintained
- Regular inspections of onsite infrastructure and structural integrity of drains, hardstand and leachate dam
- Repair and maintain any cracks observed in the base and side walls of the dam using clay, preferably bentonite or bentonite clay mixture
- Waste to be accepted at the facility is to be in accordance with the EPA licence. Waste must be effectively vetted so prohibited wastes are not accepted at the facility
- Waste is only to be received, stored or processed in areas where the leachate barrier has been installed
- Monitoring of pollutants must be undertaken as per EPL 7654
- Leachate collection and storage facilities must be maintained to collect and impound all leachate in accordance with the design storm event
- Leachate is not to be used for dust suppression on haul roads
- Leachate is to be recycled through moisture conditioning of compost, to drawdown on basin volumes and ensure the design capacity of the basin is maintained for future storm events
- Management of windrows and gradients to ensure no ponding or pooling occurs. Depressions must be filled promptly by using screened or sieved overburden
- All water that has entered processing and storage areas and water that has been contaminated by leachate must be handled and treated in the same manner as leachate
- Leachate must be collected and stored in a lined basin capable of capturing the 1% AEP, 24-hour runoff event. The hardstand pad and basin liner shall be constructed recompacted overburden/clay with an in-situ permeability (K) of less than  $1 \times 10^{-9}$  m/s in accordance with Aurecon (2017)
- The leachate dam must be designed in accordance with AS 3798-2007 - Guidelines on Earthworks for Commercial and Residential Developments
- Leachate basin is to be regularly desilted in order to maintain design storage capacity, without compromising basin liner integrity

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### Traffic and Access

As there would be no impact on the performance of the local road network, road upgrades are not required. While the traffic assessment concludes that the additional traffic generated by the facility will not adversely impact on road capacity. Bettergrow will, where possible, schedule its heavy vehicle movements to avoid the busy morning and afternoon peak hours. The performance capacity of the local road network and intersections is being further enhanced with a number of road upgrades in the vicinity of the proposed development.

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### Noise and Vibration

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As there would be no construction and operational noise impacts as a result of the development, no specific noise mitigation measures or monitoring is required. This reflects the location of the development and the background noise already present from the NEH and five surrounding mining operations.

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### Biodiversity and Bushfire

- The location of artificial wetlands in the north-western area where small dams exist is encouraged. Use of a variety of water depths, and planting of native wetland species endemic to the Singleton region is encouraged. 9.6
- Weeds present over the disturbed areas of the site should be controlled/eradicated where feasible.
- **Access Road** - A minimum 4m wide access road with 1m shoulders, passing bays every 200m to allow two-way passing of vehicles, and all-weather trafficable is to be provided;
- **Perimeter Road** - A minimum 4m wide unsealed all-weather trafficable road around the external perimeter of the compost mounds should be provided to prevent potential grass fires encroaching into the compost facility, or a fire from the compost facility spreading into surrounding grassed areas and properties;
- **Water** - A diesel or petrol-powered fire-fighting pump, with at least a 40m long hose with steel nozzle, mounted on a mobile fire tanker unit should be provided. It should be able to pump out water and cart water from the water supply tank/dam, and fight any spot fires caused by ember attack, or self-combustion;
- **An Emergency and Evacuation Plan** should be prepared - including details of the site Fire Warden, local Rural Fire Service contact numbers, emergency muster point, fire-fighting appliances and location, first aid kits, and emergency response procedures in the advent of a bush fire. The Rural Fire Service should also be notified of the development once approved so it can be added to their facility register, and details also provided of access and fire-fighting capacity onsite.

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### Visual Amenity

As the development site is already adequately screened from view no additional mitigation measures are proposed. Design and location characteristics of the development provide sufficient mitigation. Retention of existing trees within the site are recommended to maintain the existing level of screening.

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### Aboriginal Heritage

- All relevant staff should be made aware of their statutory obligations for heritage under the *National Parks and Wildlife Act 1974* and the *Heritage Act 1977*. This is to be in the form of a heritage induction on site prior to works; 9.8
- In the unlikely event that disturbed Aboriginal objects are identified during the development then they are to be collected and recorded in accordance with OEH guidelines and in consultation with the Registered Aboriginal Parties; and
- In the unlikely event that human skeletal remains are identified, work must cease immediately in the vicinity of the remains and the area cordoned off. The proponent must contact the local NSW Police who will make an initial assessment as to whether the remains are part of a crime scene or are possible Aboriginal remains. If the remains are thought to be Aboriginal, OEH must be contacted via the Enviroline 131 555. An OEH officer will determine if the remains are Aboriginal or not. If the remains are identified as Aboriginal, a management plan must be developed in consultation with the relevant Aboriginal stakeholders before works recommence.

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### Historic Heritage

- All relevant staff should be made aware of their statutory obligations for heritage under the *National Parks and Wildlife Act 1974* and the *Heritage Act 1977*. This is to be in the form of a heritage induction on site prior to works; 9.9

- In the unlikely event that disturbed Aboriginal objects are identified during the development then they are to be collected and recorded in accordance with OEH guidelines and in consultation with the Registered Aboriginal Parties; and
- In the unlikely event that human skeletal remains are identified, work must cease immediately in the vicinity of the remains and the area cordoned off. The proponent must contact the local NSW Police who will make an initial assessment as to whether the remains are part of a crime scene or are possible Aboriginal remains. If the remains are thought to be Aboriginal, OEH must be contacted via the Enviroline 131 555. An OEH officer will determine if the remains are Aboriginal or not. If the remains are identified as Aboriginal, a management plan must be developed in consultation with the relevant Aboriginal stakeholders before works recommence.

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### Socio-Economic

Implementation of measures to reduce the potential for amenity impacts during construction and operation are identified in the relevant chapters of the EIS and Statement of Commitments. No further mitigation measures are proposed with regard to socio-economic issues as it is considered that the proposed development will be of net benefit to the community, providing for decreased cost and increased social efficiency associated with composting and nutrient recycling within Singleton LGA and the surrounding area in accordance with legislative requirements. Ongoing engagement will occur with the local community and other key stakeholders during construction and operation.

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### Fire and Incident Management

- New storage structures on the site should be constructed to comply with Part E1 (deemed to satisfy provisions) and Part E2.3 (Special Hazards) of the BCA. 9.11
- A strict no smoking policy should be enforced on site when in proximity of any combustible materials. Smoking will only be permitted in clearly signposted areas;
- All water collection points should be checked regularly to ensure their ability to be accessed in an emergency;
- Fire extinguishers should be positioned at readily accessible points, including on mobile plant, so that their use in an emergency is not restricted;
- All firefighting plant and equipment should be regularly serviced in line with the manufacturer's recommendation;
- The temperature of all stockpiles and windrows should be monitored in accordance with established workplace procedures. If temperatures throughout the compost exceed 67 degrees C, then sprinkling is to be initiated to dissipate heat;
- All stockpiles and windrows should be sufficiently moist. The moisture content of compost windrows must be kept above 40% weight for weight to retard burning;
- In the event of a fire within a windrow or greenwaste stockpile, the affected stockpile/windrow must first be suppressed with either the use of water and/or dirt. The stockpile/windrow must then be pulled apart. However, if weather conditions are such that pulling apart the stockpile/windrow is likely to ignite other stockpile/windrows or spread the fire internally or externally, (eg dry with moderate/strong winds), the stockpile must not be broken up until conditions are suitable;
- In the event that a fire cannot be extinguished using water or soil, the use of fire retardants should be considered (expert advice should be sought from Fire and Rescue NSW before taking action with retardants);
- Once the fire has been extinguished, affected areas should be monitored on a continual basis until materials have cooled;
- All fire water should be contained on site;
- All staff should be trained in the use of onsite firefighting appliances;

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- Combustible materials should not be accumulated in areas close to exhausts or engines.
- Display emergency procedures and information in the site office or other visible location;
- Conduct or participate in site emergency scenarios as required;
- Regularly identify and check all site fire extinguishers and firefighting equipment.

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### Hazard and Risk

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| <ul style="list-style-type: none"><li>• All mobile plant and equipment should be fitted with fire extinguishers;</li></ul>  | <b>9.12</b> |
| <ul style="list-style-type: none"><li>• An Emergency Response Plan should be prepared and implemented for the facility;</li></ul>   |             |
| <ul style="list-style-type: none"><li>• All staff on site should be appropriately trained in the handling of dangerous goods; and</li></ul>   |             |
| <ul style="list-style-type: none"><li>• Flammable and combustible liquids will be stored in accordance with AS 1940-2004: <i>The Storage and Handling of Flammable and Combustible Liquids</i>.</li></ul> |             |

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### Waste Management

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| <p>The following mitigation and management measures will be applied during construction and operation of the facility:</p> <ul style="list-style-type: none"><li>• Plant and equipment should be regularly maintained;</li><li>• Ordering should be limited to only the required amount of materials;</li><li>• Materials should be segregated to maximise reuse and recycling;</li><li>• Routine checks should be undertaken of waste sorting and storage areas for cleanliness, hygiene and OH&amp;S issues, and contaminated waste materials;</li><li>• Separate skips and recycling bins should be provided for effective waste segregation and recycling purposes;</li><li>• Training and awareness of the requirements of the WMP and specific waste management strategies will be undertaken;</li><li>• Contaminated waste will be managed, transported, and disposed of in accordance with licensing requirements;</li><li>• Off-site waste disposal should be transported and disposed of in accordance with licensing requirements;</li><li>• Assessment of suspicious potentially contaminated materials, hazardous materials and liquid wastes should be undertaken; and</li><li>• Regular monitoring, inspection and reporting requirements should be undertaken, and findings implemented.</li></ul> | <b>9.13</b> |
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