



Concrete Recyclers (Group) Pty Ltd

7 Montore Road
Minto NSW

Operational Environmental Management Plan (OEMP)

August 2024



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Acknowledgement of Country

Concrete Recyclers acknowledges the Traditional Owners of the land on which this site is located, the people of the Dharawal Nation. We acknowledge their continuing connection to land and sea Country, and we pay our respects to their Elders past, present and emerging.

Document Control

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1.2	30 Aug 2024	Revised based on Department comments received 29 August 2024 – absence of appendices while syncing, disputes/complaints sections, updating Table of Contents	Rhys Thompson	Concrete Recyclers (Group) Pty Ltd

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1 Introduction

4Pillars Environmental Consulting Pty Ltd (4Pillars) was engaged by Concrete Recyclers (Group) Pty Ltd (Concrete Recyclers) to prepare an Operational Environmental Management Plan (OEMP) for a recent State Significant Development (SSD-5339) at 7 Montore Road, Minto (the Site). Concrete Recyclers intend on operating the Site as a Resource Recovery Facility. This OEMP is the overarching management tool that includes several sub plans in accordance with the Development Consent for the Site.

1.1 Site Details

The Site details are summarised in Table 1 below. Please refer to Figure 1 for a map of the Site locality.

Table 1: Summary of Site details.

Item	Details
Local Government Area	Campbelltown City Council
Address	7 Montore Road, Minto, NSW
Development Consent	SSD-5339
EPL	21828
Lot(s)	Lot 52 DP 618900
Zoning	IN1 – General Industrial (Campbelltown LEP 2015)
Site size (total)	23,500 m ² (2.35 ha)
Previous land use	Various commercial and industrial activities including waste and equipment storage. Currently used for equipment storage by both Concrete Recyclers and Coates Hire.
Intended future land use	Resource Recovery Facility
Surrounding land uses	IN1 – General Industrial (Campbelltown LEP 2015) SP2 – Drainage (Campbelltown LEP 2015)
Elevation	Approximately 43 m AHD above sea level
Hydrology	The Site is located on the south bank of Bow Bowing Creek, within the Bow Bowing Bunbury Curran Creek catchment.

1.2 Application

This OEMP has been prepared to comply with Conditions C1, C5 – C7 of the Development Consent:

ENVIRONMENTAL MANAGEMENT Management Plan Requirements

- C1.** Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:
- a) details of:
 - i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);
 - ii) any relevant limits or performance measures and criteria; and
 - 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;
 - b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;
 - c) 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 pursuant to paragraph (c) above;
 - d) 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;
 - e) a program to investigate and implement ways to improve the environmental performance of the development over time;
 - f) a protocol for managing and reporting any:

- i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);
 - ii) complaint;
 - iii) failure to comply with statutory requirements; and
- g) a protocol for periodic review of the plan.

Note: the Planning Secretary may waive some of these requirements if they are unnecessary unwarranted for particular management plans

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

- C5.** The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.
- C6.** As part of the OEMP required under Condition C5 of this consent, the Applicant must include the following:
- a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;
 - b) describe the procedures that would be implemented to:
 - i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;
 - ii) receive, handle, respond to, and record complaints;
 - iii) resolve any disputes that may arise;
 - iv) respond to any non-compliance;
 - v) respond to emergencies; and
 - c) include the following environmental management plans:
 - i) Traffic (see condition B5)
 - ii) Air Quality (see condition B11);
 - iii) Waste (see condition B38);
 - iv) Flood Emergency Response (see condition B18);
 - v) Water (see condition B23); and
 - vi) Landscape.
- C7.** The Applicant must:
- a) not commence operation until the OEMP is approved by the Planning Secretary; and
 - 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).

The purpose of this OEMP is to:

- Describe the proposed operational activities associated with the development;
- To outline and ensure compliance with the relevant conditions of the Development Consent, as well as all other relevant legislation, regulations, policies and guidelines; and
- Detail procedures, controls and monitoring measures to mitigate environmental impacts during the operational phase of the development.

The most recent versions of this OEMP and included sub plans will be made publicly available on Concrete Recyclers' website during the operation phase, as per condition C19 of the Development Consent.

1.3 Approval Pathway

This OEMP will be submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for approval. Site operation will not commence until this OEMP has been approved by the Planning Secretary.

2 Project Description

2.1 Construction Activities

The construction phase of the development was divided into the following main stages.

1. Implementation of the RAP to address the AECs and CoPCs identified in the Site Investigation;
2. Excavation and Bulk Earthworks;
3. Construction of structures and services; and
4. General fit out.

2.2 Operational Activities

The Resource Recovery Facility will receive up to 450,000 tonnes per annum of mixed Construction and Demolition waste (primarily concrete, brick, asphalt, sandstone and sand). The facility has been designed with a maximum storage capacity of 72,000 tonnes (50,000 tonnes of unprocessed waste material, and 22,000 tonnes of processed waste material permitted). Once received, waste materials will be processed on Site for reuse.

Incoming trucks will enter the Site from Montore Road, receive a docket, undergo an initial load inspection, then tip unprocessed waste at the tip and spread area (any waste that is not permitted will be immediately re-loaded and directed offsite for a suitably licensed facility). All trucks are to exit the Site via the weighbridge and the wheel wash. Further details on truck movements are detailed in the Operational Traffic Management Plan (Appendix 3).

Waste is processed into recycled products via the crushing, pugmill and sand washing plant on Site. Loader operators shall keep waste and product stockpiles distinct and load processed waste into outbound trucks.

A diagram of the Site layout is included in Figure 4.

3 Statutory Framework

3.1 Legislation and Planning Documents

This OEMP, including its sub plans, have been completed in accordance with the requirements of the Development Consent (SSD-5339), with reference to relevant licences, legislation, guidelines. The following documents comprise the statutory framework for the Site:

- Site Environment Protection Licence No. 21828;
- Environmental Management Plan Guidelines (DPE, 2014);
- Commonwealth Environment Protection and Biodiversity Conservation Act 1999;
- NSW Protection of the Environment Operations Act 1997;
- NSW National Parks and Wildlife Act 1974;
- NSW Heritage Act 1977;
- Contaminated Land Management Act 1997;
- State Environmental Planning Policy (Biodiversity and Conservation) 2021;
- State Environmental Planning Policy (Planning Systems) 2021;
- State Environmental Planning Policy (Resilience and Hazards) 2021;
- State Environmental Planning Policy (Transport and Infrastructure) 2021;
- NSW Framework for Biodiversity Assessment 2018;
- Campbelltown Local Environmental Plan 2015; and
- Campbelltown (Sustainable City) Development Control Plan 2015.

The operational phase of the development will be carried out in accordance with the legislation listed above.

3.2 Development Consent (SSD-5339)

The table below outlines the relevant conditions of the Development Consent (SSD-5339), and where in this OEMP and included management sub plans each condition is addressed. Please refer to Appendix 2 for the full Development Consent document.

Table 2: A summary of the relevant conditions of the Development Consent and where they are addressed in this OEMP.

Condition Number	Development Consent Condition	Where addressed in OEMP
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:	
	a) details of:	Section 3.
	i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);	
	ii) any relevant limits or performance measures and criteria; and	Section 9.1.
	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;	Section 9.1.
	b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 9.1.
	c) a program to monitor and report on the:	
	i) impacts and environmental performance of the development; and	Section 9.1.
	ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	Section 9.1.
	d) 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;	Specific mitigation measures, potential impacts and contingencies are detailed in each sub plan. (Appendix 3 - Appendix 10)
	e) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 9.3.2.
	f) a protocol for managing and reporting any:	
C5	i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);	Sections 9.3.1, 9.3.4, 10.2.
	ii) complaint;	Section 10.1.
	iii) failure to comply with statutory requirements; and	Section 9.3.4.
	g) a protocol for periodic review of the plan.	Section 10.
	The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	
C6	As part of the OEMP required under Condition C5 of this consent, the Applicant must include the following:	
	a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 0.
	b) describe the procedures that would be implemented to:	
	i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Section 9.3.
	ii) receive, handle, respond to, and record complaints;	Section 10.1.
	iii) resolve any disputes that may arise;	Section 10.2.

Condition Number	Development Consent Condition	Where addressed in OEMP
	iv) respond to any non-compliance; v) respond to emergencies; and	Section 9.3.4, Section 0, Appendix 11.
	c) include the following environmental management plans:	
	i) Traffic (see condition B5);	Appendix 3.
	ii) Air Quality (see condition B11);	Appendix 4.
	iii) Waste (see condition B38);	Appendix 7.
	iv) Flood Emergency Response (see condition B18);	Appendix 5.
	v) Water (see condition B23); and	Appendix 6.
	vi) Landscape.	Appendix 10.
C7	The Applicant must: a) not commence operation until the OEMP is approved by the Planning Secretary; and 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).	

4 Implementation of This OEMP

4.1 Purpose and Objectives of the OEMP

The purpose of this OEMP is to:

- Describe the proposed operational activities associated with the development;
- To outline and ensure compliance with the relevant conditions of the Development Consent, as well as all other relevant legislation, regulations, policies and guidelines; and
- Detail procedures, controls and monitoring to mitigate environmental impacts during operations.

4.2 Operational Environmental Management Sub Plans

All sub plans are to be followed throughout the operational phase of the development. A summary of this OEMP's sub plans, and associated Development Consent Conditions are included in Table 3 below.

Table 3: The sub plans included within this OEMP.

Sub Plan (Author)	Development Consent Condition	OEMP Appendix
Operational Traffic Management Plan (McLaren)	Condition B5	Appendix 3
Air Quality Management Plan (Todoroski Air Sciences)	Condition B11	Appendix 4
Flood Emergency Response (4Pillars)	Conditions B18 – B22	Appendix 5
Water Management Plan (4Pillars)	Conditions B23 & B24	Appendix 6
Waste Management Plan (4Pillars)	Conditions B38 - B44	Appendix 7
Pest and Weed Management Plan (4Pillars)	Condition B45	Appendix 8
Chemical Storage Management Plan (4Pillars)	Conditions B48 – B50	Appendix 9
Landscape Management Plan (4Pillars)	Condition C6	Appendix 10

5 Roles and Responsibilities

The table below summarises the roles and responsibilities of Site personnel.

Table 4: Roles and responsibilities of Site personnel.

Role	Responsibilities
Project Manager	• Observing all legal WHS and environmental requirements. • Implementing this OEMP and procedures to control and mitigate environmental impacts and incidents on Site. • Ensuring that all operational activities are conducted in a manner with minimised risk to WHS and the environment. • Identifying WHS and environmental management training required for the Site. • Ensuring Site Staff, Visitors and Contractors undertake required training. • Investigating incidents and ensuring that reporting and follow-up corrective actions are undertaken. • Ensuring that appropriate resources and processes are in place to enable workers to receive and respond in a timely manner to information regarding incidents, hazards and risks. • Communicating and consulting with the Site Manager and Staff. • Engaging the services of an Environmental Consultant for advice if required.
Site Manager	• Ensuring safe work practices at all time. • Conducting site inductions, toolbox talks and Site training. • Ensuring legal WHS and environmental requirements are met on Site. • Ensuring inspections, monitoring and reporting are conducted as required. • Facilitating the preparation of SWMS as required. • Participating in incident investigations and reporting as required. • Supervising and ensuring compliance with WHS and environmental management procedures.
Site Staff/ Visitors/ Contractors	• Attending all required Site inductions, toolbox talks and training. • Conducting operational tasks in accordance with training and Site procedures. • Complying with the site WHS and environmental management rules. • Complying with relevant SWMS.

6 Training

The table below summarises environmental training required for the operational phase of the development.

Table 5: Environmental training required during the operational phase.

Training	Description	Personnel
Site inductions	All Staff, truck drivers, and visitors to the Site must be inducted prior to commencing work.	All Site staff and Site visitors
Weekly toolbox talks	Weekly safety talks with staff to ensure safety and environmental procedures and concerns are conducted and addressed appropriately.	All Site staff
Driver's Code of Conduct (DCC)	All truck drivers will be required to sign a copy of the DCC. All other Site staff will be familiarised on the DCC. Details are included in the OTMP (Appendix 3).	All Site staff, & Truck drivers transporting material to and from the facility
Flood risk training	Training to cover the procedure included in the Flood Emergency Response Procedure (Appendix 5). Included in Site induction.	All Site staff
OEMP training	Training to ensure all employees understand the contents and requirements of this OEMP and each sub plans. Included in Site induction and repeated for any updates to the OEMP.	All Site staff

Any additional staff or contractor training deemed necessary will be added to this OEMP in the next review.

7 Emergency Response

Detailed emergency response protocols are outlined in the Emergency Response Plan (ERP - Appendix 11) and the Flood Emergency Response Plan (FERP - Appendix 5).

7.1 Contacts

Contact details for relevant authorities are included in the table below.

Table 6: Relevant contact details.

Contact	Description	Contact information
Concrete Recyclers Project Manager (Anthony Males)	Contact in event of Environmental Impact	0427 308 437
NSW Environment Protection Authority (EPA)	Main environmental regulator for sites with an EPL	131 555
Campbelltown City Council	Local government environmental regulator	(02) 4645 4000
NSW Ministry of Health	Public health authority	(02) 9391 9000
SafeWork NSW	WHS authority	13 10 50
Fire and Rescue NSW	Emergency services – flood hazards	1300 729 579 (or 000)

8 Environmental Management

8.1 Environmental Risk Assessment

An environmental hazard and risk assessment was conducted for the Site as part of the Environmental Impact Statement (EIS) (2020). The EIS identifies the following potential hazards during operations:

- Re-fuelling of plant and equipment;
- Contamination of surface water;
- Equipment or material combustion;
- Acoustic and air quality impacts;
- Storage and handling of dangerous goods; and
- Receipt of contaminated material.

A summary of the potential impacts of operations and the respective mitigations/controls to be implemented have been summarised in the table below.

Table 7: Potential Site impacts and mitigation measures detailed in the EIS.

Potential Impacts	Description	Mitigations & Controls
Air Quality	Potential for pollutants including Total Suspended Particulates (TSP), Particulate Matter (PM10 and PM2.5), and Respirable crystalline silica (RCS) to generate from unsealed roads and stockpile lift-off.	Detailed in the AQMP (Appendix 4).
Noise	Potential for impacts caused by noise and vibration generated on Site.	• Truck routes avoid residential receivers • Site bund walls
Greenhouse Gases	Includes energy usage and emissions from operational activities: • Truck movements • Operational machinery and plant • Electricity usage	• Avoid idling of vehicles, plant and equipment • Keep fuel logs, and perform regular inspections and maintenance • Use of energy saving appliances
Visual	Potential visual impacts include: • Visibility of Site operations • Visibility of bare-earth surfaces	Detailed in the LMP (Appendix 10).
Traffic	Traffic impacts due to truck movements.	Detailed in the OTMP (Appendix 3).
Water Quality	Potential risk for surface water contamination on Site.	Detailed in the WatMP (Appendix 6).
Flooding & Stormwater Drainage	Potential risks associated with flooding on Site.	Detailed in the FERP & WatMP (Appendix 5 and Appendix 6).
Flora and Fauna	Spread of weeds and pests during operational phase.	Detailed in the PWMP (Appendix 8).
Groundwater	Potential risk for groundwater contamination on Site.	Detailed in the WatMP (Appendix 6).
Waste	• Office wastes • Amenity wastes • Site waste	Detailed in the WMP (Appendix 7).

9 Monitoring, Auditing and Reporting

9.1 Monitoring & Performance Indicators

Monitoring during the operational phase of the development aims to mitigate and record environmental impacts and incidents caused by operational activities. The Site monitoring schedule and related performance indicators for each type of monitoring are outlined in Table 8 below.

Table 8: Monitoring and performance indicators for the operational phase of the development.

Monitoring Type	Performance indicators	Responsibility	Schedule
Weather monitoring	Weather should be regularly monitored through the Bureau of Meteorology (BoM) - both daily forecast and weather warnings to ensure emergency response can be effectively implemented.	Site Manager or delegate	Daily
Ensuring availability of documentation	All plans, licences and other relevant documents should consistently be available in the Site office for referral to by staff or relevant authorities.	Site Manager or delegate	Ongoing
Flood monitoring on Site	Monitoring should identify signs of flood (e.g., rising water levels, increased rain) immediately to ensure emergency response can be effectively implemented. Further details are included in the Flood Emergency Response Plan in Appendix 5.	Site Manager or delegate	Ongoing
Pollution monitoring	Operational activities should not cause pollution of the Site or its surrounds. Monitoring of the Site as well as Bow Bowing Creek should identify any signs of pollution for prompt response and reporting.	Site Manager or delegate	Ongoing
Noise monitoring	Noise monitoring will be conducted throughout the operational phase to ensure EPL noise limits are complied with.	Project Manager / Environmental Advisor	As specified in EPL
Air quality monitoring	In accordance with the Site EPL, Condition B13 of the development consent and the Air Quality Management Plan (Appendix 4).	Site Manager or delegate	As detailed in the AQMP
Surface water monitoring	In accordance with the Surface Water Management Plan included in the Water Management Plan (Appendix 6).	Site Manager or delegate	As detailed in the WatMP
Waste monitoring	In accordance with the Waste Monitoring Program included in the Waste Management Plan (Appendix 7).	Site Manager or delegate	As detailed in the WMP
Revegetation monitoring	In accordance with the Landscape Monitoring Plan (Appendix 10).	Site Manager or delegate	As detailed in the LMP
Pest and weed monitoring	In accordance with the Pest and Weed Management Plan (Appendix 8).	Site Manager or delegate	As detailed in the PWMP

9.2 Auditing

In accordance with Condition C16 of the Development Consent, an Independent Environmental Audit will be conducted within one year of the commencement of the operational phase, and every three years after, unless the Planning Secretary directs otherwise.

Independent Environmental Audits will be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020) by a suitably qualified and independent team of experts (approved by the Planning Secretary).

9.3 Reporting

9.3.1 Incident notification, reporting and response

The Site Manager and the Project Manager are to be immediately notified in the event of an incident on Site. The Planning Secretary must also be immediately notified in writing via the Major Projects portal. Other relevant regulatory authorities (i.e. the EPA) and stakeholders will be contacted in the event of a regulator-notifiable or stakeholder-notifiable incident.

If any environmental impacts are identified as a result of the incident, the Project Manager should immediately seek the advice of the designated Environmental Consultant.

A 'post-incident report' is to be completed by all personnel involved in the incident and kept on file. The Site Manager is responsible for ensuring that all required information has been collected, and that all concerned parties have completed a report.

9.3.2 Compliance reporting

Compliance Reports must be submitted to the Planning Secretary annually following the first year of operations, in accordance with the Compliance Reporting Post Approval Requirements (Department 2020), and condition C14 of the Development Consent. The timeframe for submission of these Compliance Reports is within three months after the first year of commencement of operation of the development, and in the same month each subsequent year.

Compliance Reports will identify trends in monitoring data, assess the ongoing impacts of the development, and describe future measures to improve environmental performance. Completed Compliance Reports will be made available on the Concrete Recyclers website, which is accessible to the public and local community. In this way, the local community and relevant agencies will be kept informed about the operation and environmental performance of the development.

9.3.3 General notifications

Condition C6(b)(i) requires that the local community and relevant agencies are kept informed about the operation and environmental performance of the development. We consider the relevant agencies to include the NSW EPA, DPHI, and Campbelltown City Council.

To ensure that the NSW EPA is kept informed about the operation and environmental performance of the development, an Annual Return will be completed in accordance with the requirements of the Site EPL and issued to the NSW EPA, comprising a:

- Statement of Compliance
- Monitoring and Complaints Summary
- Statement of Compliance - Licence Conditions
- Statement of Compliance - Load based Fee
- Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan
- Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
- Statement of Compliance - Environmental Management Systems and Practices.

This Annual Return will be prepared annually, covering the previous reporting period, and will be submitted within 60 days of the end of the reporting period, as required.

To ensure that DPHI is kept informed about the operation and environmental performance of the development, an annual Compliance Report will be prepared and issued as per section 9.3.2, above. These reports will be prepared annually, and submitted within the timeframes specified, being 3 within three months after the first year of commencement of operation of the development, and in the same month each subsequent year.

To ensure that Campbelltown City Council is kept informed about the operation and environmental performance of the development, they will be sent an email will upon publication of the Compliance Report on the company website, with a link to access it.

Ad hoc notifications to the local community and relevant agencies will be undertaken as required, and may include noticeboards at the Site or on the company website, through media (newspaper articles etc.), or via direct contact as per the below details:

- EPA Environment Line, via email: info@epa.nsw.gov.au
- DPHI, via post: Department of Planning, Housing and Infrastructure, Locked Bag 5022, Parramatta NSW 2124
- Campbelltown City Council, via email: council@campbelltown.nsw.gov.au

Ad hoc notifications do not have a timeframe associated with them, as they will be dependent on events arising that justify notifications being carried out.

9.3.4 Non-compliance notification

In the event a non-compliance is identified, a non-compliance notification must be submitted to the Planning Secretary within seven days (unless the non-compliance has already been reported as part of an incident notification). Non-compliance notifications are to be submitted in accordance with condition C12 of the Development Consent. Further detail is provided in Section 10.2.

10 Procedures For Managing Complaints, Disputes, and Non-Compliances

10.1 Management of complaints

The Project Manager and the Site Manager will be responsible for receiving, handling, recording, and responding to complaints with regard to Site operations. A Complaints/Disputes Register will be kept on file and updated monthly at a minimum. Complaints will be investigated, responded to, and addressed promptly where possible. An annual review of the register will be conducted to ensure ongoing issues are addressed. The Complaints/Disputes Register template is included in Appendix 12.

10.1.1 Complaints handling process

The complaints handling process to be followed is presented in Table 9, below.

Table 9: Complaints handling process.

Step	Status	Supplementary Information / Action
1	Complaint is received	Complaints may be received in various ways, including online, by phone, email, social media or in person.
2	Record the complaint	Record details of the complaint in the Complaints/Disputes Register (Appendix 12). Details required include: • Date and time of complaint • Initial communication method used • Subject of the complaint • Name of complainant • Details of the issue and how the complainant wants it to be resolved, as well as any support the complainant may need

		If the complaint is resolved at first contact, record details about the corrective action taken and the resolution.
3	Acknowledge the complaint	Let the complainant know that their complaint has been received. This is to be completed as soon as possible and within three business days of receipt. Consider the most appropriate communication channel (e.g. phone or email). Provide the complainant with a contact point, key timeframes and the likely next steps.
4	Assess the complaint	Assess the complaint to decide what action to take next. Considerations may include: • Severity, urgency and complexity • Aspect of the complaint (e.g. environmental, traffic, community engagement) • Health and safety or environmental implications • Potential for the complaint to escalate (e.g. to DPHI or the EPA) • Feasibility of the actions requested by the complainant If there are multiple issues raised in the complaint, determine whether these need to be managed separately.
5	Decide what action to take	If further investigation is required, carry out this investigation. If actions can be undertaken to remediate the source of the complaint, implement these actions. Keep records about how the complaint was managed, the outcome, recommendations and any actions that need to be followed up.
6	Provide an update to the complainant	Contact the complainant via the same channel as per Step 3 (if appropriate), to inform them of the outcome. Ensure that the Complaints/Disputes Register (Appendix 12) is completed. This should consider the complaint closed.

10.2 Management of disputes

The Project Manager and the Site Manager will be responsible for receiving, handling, recording, and responding to disputes between parties (e.g. between the Proponent and tenants, or a public authority such as the Council, EPA or the Department). A Complaints/Disputes Register will be kept on file and updated monthly at a minimum. Disputes will be investigated, responded to, and addressed promptly where possible. An annual review of the register will be conducted to ensure ongoing issues are addressed. The Complaints/Disputes Register template is included in Appendix 12.

10.2.1 Disputes handling process

The disputes handling process to be followed is presented in Table 10, below.

Table 10: Disputes handling process.

Step	Status	Supplementary Information / Action
1	Dispute is raised	A dispute may be raised in various ways, however – if from a regulator authority – is most likely to come via an official notice (e.g. email, or post).

2	Record the dispute	Record details of the dispute in the Complaints/Disputes Register (Appendix 12). Details required include: • Date and time of dispute • Initial communication method used • Subject of the dispute • Name of representative raising the dispute • Details of the issue and how the representative wants it to be resolved, as well as any support the representative may need If the dispute is resolved at first contact, record details about the corrective action taken and the resolution.
3	Acknowledge the dispute	Let the representative know that their dispute has been received. This is to be completed as soon as possible and within three business days of receipt, or within the appropriate timeframe as provided by an official notice. All responses should be provided in writing (e.g. email or post). Provide the representative with a contact point, key timeframes and the likely next steps.
4	Assess the dispute	Assess the dispute to decide what action to take next. Considerations may include: • Severity, urgency and complexity • Aspect of the dispute • Health and safety or environmental implications • Potential for the dispute to escalate • Whether legal representation should be sought If there are multiple issues raised, determine whether these need to be managed separately.
5	Decide what action to take	If further investigation is required, carry out this investigation. If legal representation is required, source this representation, and follow the advice of engaged parties (note: this advice may be contradictory to the process shown here, but should be followed). If actions can be undertaken to remediate the source of the dispute, implement these actions. • Possible outcomes of a dispute could include arbitration, mediation, or legal proceedings Keep records about how the dispute was managed, the outcome, recommendations and any actions that need to be followed up.
6	Provide an update to the representative	Contact the representative via the same channel as per Step 3 (if appropriate), to inform them of the outcome, once the relevant process is completed. Ensure that the Complaints/Disputes Register (Appendix 12) is completed. This should consider the dispute closed.

10.3 Responding to non-compliances

The Project Manager (or their delegate) will be responsible for notifying non-compliances with the Development Consent, although many parties may identify non-compliances.

10.3.1 Non-compliances management process

The process to be followed upon identification of a non-compliance is presented in Table 11, below.

Table 11: Management of non-compliances.

Step	Status	Supplementary Information / Action
1	Non-compliance is identified	Non-compliances may be identified in various ways, including through site inspections, audits, as raised by workers, or as a result of complaints/disputes that have been raised.
2	Notify the Planning Secretary	Within seven days after becoming aware of any non-compliance, the Planning Secretary must be notified in writing. This notification must be submitted via the Major Projects website, and is to be undertaken by the Project Manager, or their delegate. Details required include: • Development and the application number • Condition of consent that the development is non-compliant with • The way it does not comply • The reasons for non-compliance (if known) • What actions have been, or will be, undertaken to address the non-compliance Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.
3	Assess the non-compliance	Following the prompt notification, a thorough assessment should be undertaken to further clarify: • The reasons for non-compliance (if known) • What actions have been, or will be, undertaken to address the non-compliance
4	Take action to address non-compliance	If actions can be undertaken to remedy the non-compliance or prevent future non-compliances, implement these actions. Keep records, as these may be requested by the Planning Secretary as part of their investigation into the non-compliance and its management.
5	Report non-compliances	Include non-compliances and subsequent management actions in relevant reports, such as the annual Compliance Reports prepared in accordance with Section 9.3.2, and Annual Returns (if relevant).

11 Review and Improvement

This OEMP and attached sub plans will be reviewed throughout the operation of the facility to ensure continued compliance with environmental policies, guidelines and objectives. The OEMP is to be reviewed by an Environmental Consultant within three months of:

- the submission of a Compliance Report, incident report or non-compliance notification;
- following any modification to the Development Consent;
- the submission an independent audit; or
- the issue of a direction of the Planning Secretary which requires a review.

Any updates or amendments to this OEMP must be approved by the Planning Secretary. A hard copy of the approved, current OEMP will be held in the Site Office and is to be available if requested by relevant authorities.

12 Appendix List

- Appendix 1. Figures and Maps
- Appendix 2. Development Consent (SSD-5339)
- Appendix 3. Operational Traffic Management Plan (OTMP)
- Appendix 4. Air Quality Management Plan (AQMP)
- Appendix 5. Flood Emergency Response Plan (FERP)
- Appendix 6. Water Management Plan (WatMP)
- Appendix 7. Waste Management Plan (WMP)
- Appendix 8. Pest and Weed Management Plan (PWMP)
- Appendix 9. Chemical Storage Management Plan (CSMP)
- Appendix 10. Landscape Management Plan (LMP)
- Appendix 11. Emergency Response Plan (ERP)
- Appendix 12. Complaints/Disputes Register Template

Site locality



Drawn by:	KP	Report reference: CR_OEMP	Key:	Refer to map legend.
Date:	25/7/22	Image source: QGIS		

Figure 1: Site locality.

Site boundary



Drawn by:	KP	Report reference:	CR_OEMP	Key:	Refer to map legend.
Date:	5/7/22	Image source:	QGIS with Nearmap overlay dated 15/6/22		

Figure 2: Site boundary and satellite imagery.

Site zoning

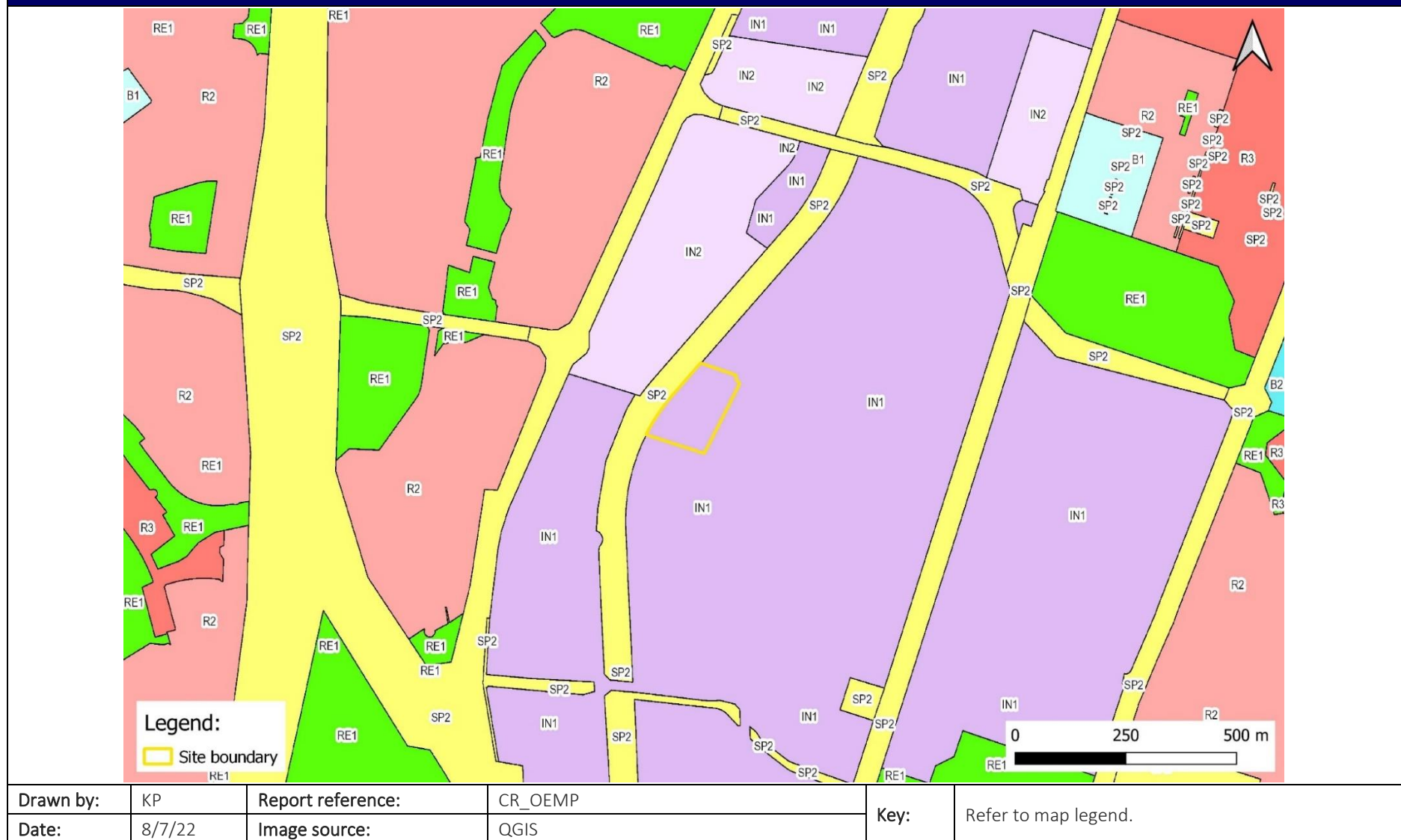


Figure 3: Zoning of Site and surrounds according to the CCC LEP 2015.

Site layout

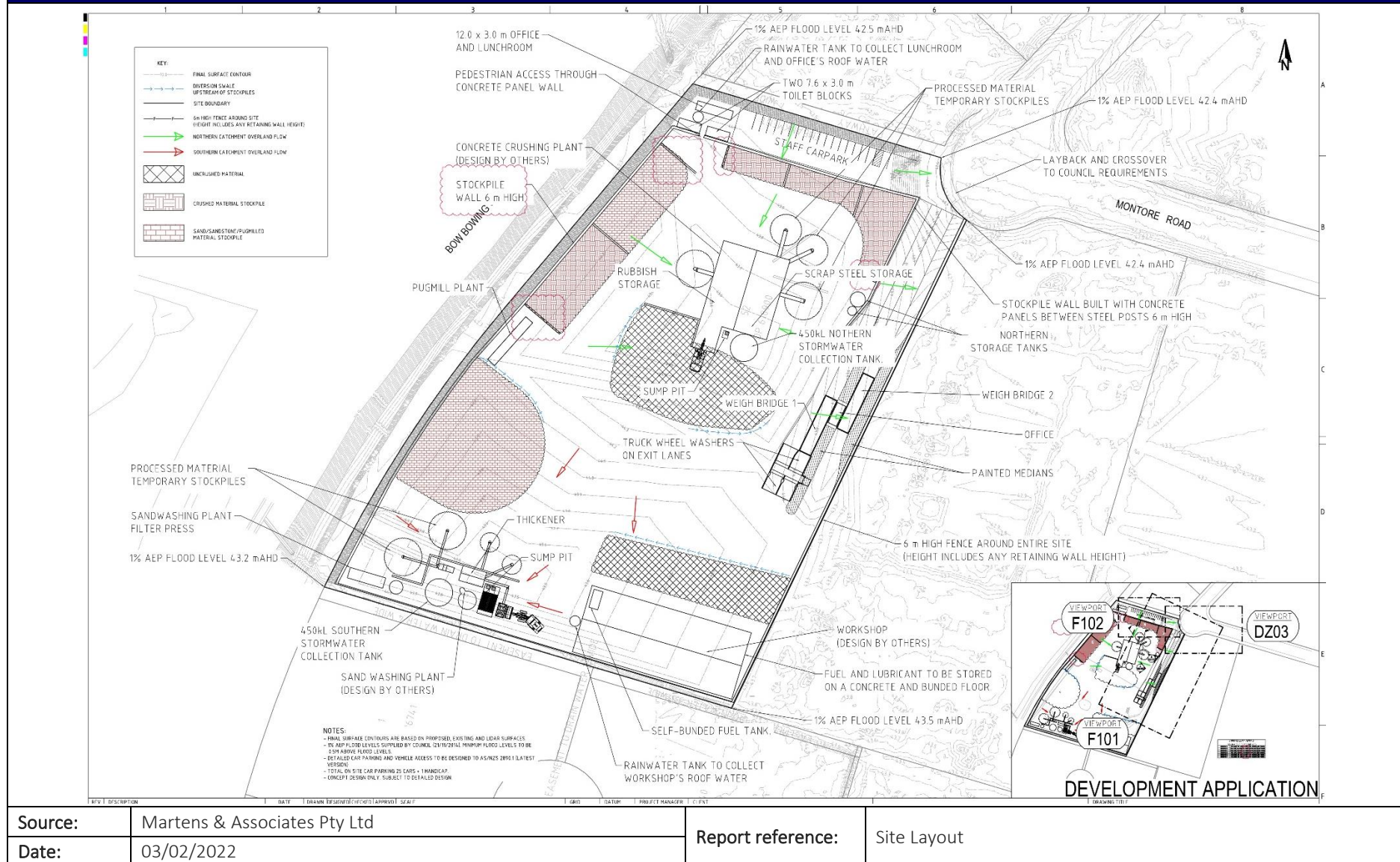


Figure 4: Site layout.

Council flood mapping

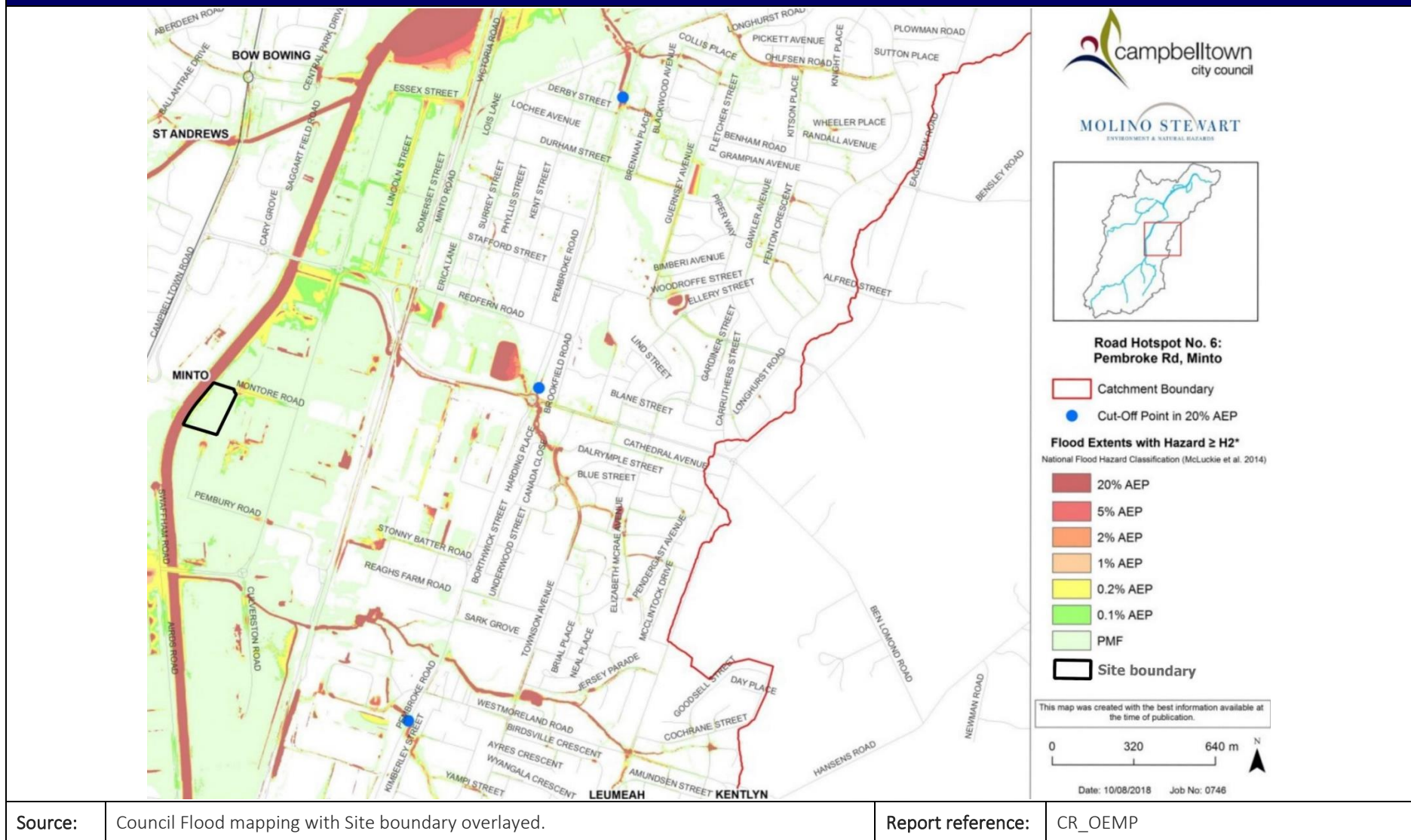


Figure 5: Flood mapping from the Bow Bowing Bunbury Curran Creek Strategic Floodplain Risk Management Study and Plan.

Development Consent

Section 4.38 of the *Environmental Planning and Assessment Act 1979*

As delegate of the Minister for Planning under delegation executed on 9 March 2022, I approve the Development Application referred to in Schedule 1, subject to the conditions specified in Schedule 2.

These conditions are required to:

- prevent, minimise, or offset adverse environmental impacts;
- set standards and performance measures for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the ongoing environmental management of the development



Chris Ritchie
Director
Industry Assessments

Sydney

17 June 2022

File: EF19/12317

SCHEDULE 1

Application Number:	SSD 5339
Applicant:	The Trustee for Minto Property Trust
Consent Authority:	Minister for Planning
Site:	7 Montore Road, Minto, Lot 52 DP 618900
Development:	Construction and operation of a resource recovery facility with the capacity to accept and process up to 450,000 tonnes per annum of construction and demolition waste

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DEFINITIONS

Additional Information	The Applicant's addendum response to issues raised in submissions received in relation to the application for consent for the development under the EP&A Act and includes the letters from Nexus Environmental Planning dated 22 February 2022 and 27 April 2022
Asbestos Management Plan	Asbestos Management Plan included in the RTS, prepared by EI Australia dated 15 April 2021
Applicant	The Trustee for Minto Property Trust or any person carrying out any development to which this consent applies
BCA	Building Code of Australia
BC Act	<i>Biodiversity Conservation Act 2016</i>
Carrier	Operator of a telecommunication network and/ or associated infrastructure, as defined in section 7 of the <i>Telecommunications Act 1997</i> (Cth)
Certifier	A council or an accredited certifier (including principal certifiers) who is authorised under section 6.5 of the EP&A Act to issue Part 6 certificates
CEMP	Construction Environmental Management Plan
Conditions of this consent	Conditions contained in Schedule 2 of this document
Construction	The demolition and removal of buildings or works, the carrying out of works for the purpose of the development, including bulk earthworks, and erection of buildings and other infrastructure permitted by this consent.
Council	Campbelltown City Council
Day	The period from 7 am to 6 pm on Monday to Saturday, and 8 am to 6 pm on Sundays and Public Holidays
Decommissioning	The controlled process of safely retiring a facility from service, including decontamination, dismantling and disposal after the cessation of operations.
Demolition	The deconstruction and removal of buildings, sheds and other structures on the site
Department	NSW Department of Planning and Environment
Development	The development described in Schedule 1, the EIS and Response to Submissions, and Additional Information including the works and activities comprising construction and operation of a resource recovery facility processing up to 450,000 tonnes per annum of construction and demolition waste as modified by the conditions of this consent.
Development layout	The plans at Appendix 1 of this consent
Earthworks	Bulk earthworks, site levelling, import and compaction of fill material, excavation for installation of drainage and services, to prepare the site for construction
EES	Environment, Energy and Science Group (former Office of Environment and Heritage)
EIS	The Environmental Impact Statement titled <i>Environmental Impact Statement Resource Recovery Facility SSD 5339</i> , prepared by Nexus Environmental Planning Pty Ltd dated 13 October 2020 submitted with the application for consent for the development,
ENM	Excavated Natural Material
Environment	As defined in section 1.4 of the EP&A Act
EPA	NSW Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPL	Environment Protection Licence under the POEO Act
Evening	The period from 6 pm to 10 pm
Evening shoulder	The period from 6 pm to 7 pm Monday to Friday

Heritage	Encompasses both Aboriginal and historic heritage including sites that predate European settlement, and a shared history since European settlement
Heritage item	An item as defined under the <i>Heritage Act 1977</i> , and assessed as being of local, State and/ or National heritage significance, and/or an Aboriginal Object or Aboriginal Place as defined under the <i>National Parks and Wildlife Act 1974</i> , the World Heritage List, or the National Heritage List or Commonwealth Heritage List under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth), or anything identified as a heritage item under the conditions of this consent
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 Note: "material harm" is defined in this consent
Land	Has the same meaning as the definition of the term in section 1.4 of the EP&A Act
Material harm	Is harm that: a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or 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)
Minister	NSW Minister for Planning (or delegate)
Mitigation	Activities associated with reducing the impacts of the development prior to or during those impacts occurring
Monitoring	Any monitoring required under this consent must be undertaken in accordance with section 9.40 of the EP&A Act
Morning shoulder	The period from 6 am to 7 am Monday to Friday
Night	The period from 10 pm to 7 am on Monday to Saturday, and 10pm to 8am on Sundays and Public Holidays
Non-compliance	An occurrence, set of circumstances or development that is a breach of this consent
NRAR	Natural Resources Access Regulator, DPIE
OEMP	Operational Environmental Management Plan
Operation	The receipt, storage and processing of concrete, brick, asphalt, sandstone and sand as described in the EIS and RTS
Principal Certifier	The certifier appointed as the principal certifier for the building work under section 6.6(1) of the EP&A Act
Planning Secretary	Secretary of the Department, or delegate
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Reasonable	Means applying judgement in arriving at a decision, taking into account: mitigation benefits, costs of mitigation versus benefits provided, community views, and the nature and extent of potential improvements.
Registered Aboriginal Parties	Means the Aboriginal persons identified in accordance with the document entitled " <i>Aboriginal cultural heritage consultation requirements for proponents 2010</i> " (DECCW)
Rehabilitation	The restoration of land disturbed by the development to a good condition, to ensure it is safe, stable and non-polluting.
Remedial Action Plan	Remedial Action Plan included in the EIS, prepared by EI Australia dated 24 March 2020
Response to submissions	The Applicant's response to issues raised in submissions received in relation to the application for consent for the development under the EP&A Act and includes the document titled Resource Recovery Facility SSD 5339 Concrete Recyclers Pty Ltd prepared by Nexus Environmental Planning Pty Ltd and dated 13 September 2021
Sensitive receivers	A location where people are likely to work, occupy or reside, including a dwelling, school, hospital, office or public recreational area.

Site	The land defined in Appendix 1.
Site Auditor	As defined in section 4 of the <i>Contaminated Land Management Act 1997</i>
Site Audit Report	As defined in section 4 of the <i>Contaminated Land Management Act 1997</i>
Site Audit Statement	As defined in section 4 of the <i>Contaminated Land Management Act 1997</i>
TfNSW	Transport for New South Wales
VENM	Virgin Excavated Natural Material
Waste	Has the same meaning as the definition of the term in the Dictionary to the POEO Act
Year	A period of 12 consecutive months

SCHEDULE 2

PART A ADMINISTRATIVE CONDITIONS

OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT

- 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.

TERMS OF CONSENT

- A2. The development may only be carried out:
- (a) in compliance with the conditions of this consent;
 - (b) in accordance with all written directions of the Planning Secretary;
 - (c) in accordance with the EIS, Response to Submissions and the Additional Information;
 - (d) in accordance with the Development Layout in Appendix 1; and
 - (e) in accordance with the management and mitigation measures in Appendix 2.
- A3. Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:
- (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and
 - (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).
- A4. The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.

LIMITS OF CONSENT

Lapsing

- A5. This consent lapses five years after the date from which it operates, unless the development has physically commenced on the land to which the consent applies before that date.

Waste

- A6. The Applicant must not:
- (a) receive and process more than 450,000 tonnes per annum (tpa) of general solid waste (non-putrescible) limited to concrete, asphalt, sandstone and sand from the building and demolition industry; and
 - (b) store more than 50,000 tonnes of unprocessed waste and 22,000 tonnes of processed waste (product) at any one time.

NOTIFICATION OF COMMENCEMENT

- A7. The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary:
- (a) construction;
 - (b) operation;
 - (c) cessation of operations; and
 - (d) decommissioning.
- A8. If the construction or operation or decommissioning of the development is to be staged, the Planning Secretary must be notified in writing, at least one month before the commencement of each stage (or other timeframe agreed with the Planning Secretary), of the date of commencement and the development to be carried out in that stage.

EVIDENCE OF CONSULTATION

- A9. Where conditions of this consent require consultation with an identified party, the Applicant must:
- (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and

- (b) provide details of the consultation undertaken including:
 - (i) the outcome of that consultation, matters resolved and unresolved; and
 - (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.

STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS

- A10. With the approval of the Planning Secretary, the Applicant may:
- (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);
 - (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and
 - (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).
- A11. If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.
- A12. If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.

PROTECTION OF PUBLIC INFRASTRUCTURE

- A13. Before the commencement of construction of the development, the Applicant must consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;
- A14. Unless the Applicant and the applicable authority agree otherwise, the Applicant must:
- (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and
 - (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.

DEMOLITION

- A15. All demolition must be carried out in accordance with *Australian Standard AS 2601-2001 The Demolition of Structures* (Standards Australia, 2001).

STRUCTURAL ADEQUACY

- A16. All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.

Note:

- *Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.*
- *Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.*

COMPLIANCE

- A17. The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.

CONTRIBUTIONS TO COUNCIL

- A18. Before the issuing of an occupation certificate for any part of the development, a payment of a levy of 1% of the proposed cost of carrying out the development must be paid to Council under section 7.12 of the EP&A Act.

Note: There are approval requirements for imposing a condition under section 7.12 in respect of land within a special contributions area.

OPERATION OF PLANT AND EQUIPMENT

- A19. All plant and equipment used on site, or to monitor the performance of the development, must be:
- (a) maintained in a proper and efficient condition; and
 - (b) operated in a proper and efficient manner.

EASEMENTS

- A20. Within 12 months after the date of this consent, an easement under section 88A and/or restriction or public positive covenant under section 88E of the *Conveyancing Act 1919* naming the Council as the prescribed authority, which can only be revoked, varied or modified with the consent of the Council, and which provides for the passage of flood water must be registered on title of Lot 52 DP 618900.

EXTERNAL WALLS AND CLADDING

- A21. The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.
- A22. Prior to the issuing of:
- (a) any Construction Certificate relating to the construction of external walls (including the installation of finishes and claddings such as synthetic or aluminium composite panels); and
 - (b) an Occupation Certificate,
- the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls (including finishes and claddings such as synthetic or aluminium composite panels) comply with the requirements of the BCA.
- A23. The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.

UTILITIES AND SERVICES

- A24. Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.
- A25. Before the commencement of operation of the development, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the *Sydney Water Act 1994*.

WORK AS EXECUTED PLANS

- A26. Before the issuing of the Occupation Certificate for the development, work-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Principal Certifier.

APPLICABILITY OF GUIDELINES

- A27. References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.
- A28. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.

ADVISORY NOTES

- AN1.** All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.

PART B SPECIFIC ENVIRONMENTAL CONDITIONS

TRAFFIC AND ACCESS

Construction Traffic Management Plan

- B1. Prior to the commencement of construction, the Applicant must prepare a Construction Traffic Management Plan for the development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by condition C2 and must:
- (a) be prepared by a suitably qualified and experienced person(s);
 - (b) detail the measures that are to be implemented to ensure road safety and network efficiency during construction;
 - (c) detail heavy vehicle routes, access and parking arrangements;
 - (d) include a **Construction Driver Code of Conduct** to:
 - (i) minimise the impacts of earthworks and construction on the local and regional road network;
 - (ii) minimise conflicts with other road users;
 - (iii) minimise road traffic noise; and
 - (iv) ensure truck drivers use specified routes;
 - (e) include a program to monitor the effectiveness of these measures; and
 - (f) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.
- B2. The Applicant must:
- (a) not commence construction until the Construction Traffic Management Plan required by condition B1 is approved by the Planning Secretary; and
 - (b) implement the most recent version of the Construction Traffic Management Plan approved by the Planning Secretary for the duration of construction.

Roadworks and Access

- B3. Prior to the commencement of construction, the Applicant must submit design plans to the satisfaction of the relevant roads authority which demonstrate that the proposed access to the development is designed to accommodate the turning path of 20 m standard articulated vehicle and in accordance with Council's Engineering Guidelines.

Parking

- B4. The Applicant must provide sufficient parking facilities on-site, 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.

Operational Traffic Management Plan

- 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 OTMP must form part of the OEMP required by Condition C5 and must:
- (a) be prepared by a suitably qualified and experienced person(s), whose appointment has been endorsed by the Planning Secretary;
 - (b) be prepared in consultation with Council;
 - (c) detail the measures that are to be implemented to ensure road safety and network efficiency;
 - (d) detail heavy vehicle routes, access, and parking arrangements;
 - (e) include a stockpile management plan to describe how waste and product stockpiles will be managed to avoid encroaching onto the haulage route and allow the safe loading and unloading of heavy vehicles;
 - (f) include an **Operational Driver Code of Conduct** to:
 - (i) minimise the impacts on the local and regional road network;
 - (ii) minimise conflicts with other road users;
 - (iii) minimise road traffic noise;
 - (iv) inform truck drivers of the site access arrangements and use of specified haul routes which exclude Raby Road between Campbelltown Road and Eagle Vale Drive;
 - (v) include a program to monitor the effectiveness of these measures; and
 - (g) include a Traffic Control Plan (TCP) detailing:

- (i) heavy vehicle routes, road safety and efficiency measures and the on-site measures to be implemented to control the manoeuvring of vehicles in designated areas, including front-end loaders within the waste receipt and processing areas and mitigate the potential for on-site vehicle conflict; and
- (ii) installation of weighbridges and signage.

Operating Conditions

B6. 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 2890.6:2009 Parking facilities Off-street parking for people with disabilities* (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) 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;
- (f) all loading and unloading of materials is carried out on-site;
- (g) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network
- (h) a full-time traffic control officer is on-site to manage vehicle conflicts.

AIR QUALITY

Dust Minimisation

- B7. The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.
- B8. During construction of the development, the Applicant must ensure that:
- (a) exposed surfaces and stockpiles are suppressed by regular watering;
 - (b) all trucks entering or leaving the site with loads have their loads covered;
 - (c) trucks associated with the development do not track dirt onto the public road network;
 - (d) public roads used by these trucks are kept clean; and
 - (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.

Air Quality Discharges

- B9. The Applicant must fit and operate baghouses on the cement silo and pugmill and a dust extraction system on the processing plant 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.

Site Hardstand

- B10. The Applicant must seal the site with a 5% roller compacted concrete or asphalt in accordance with the air quality modelling provided at Attachment 5 to the Additional Information dated 22 February 2022.

Air Quality Management Plan

- B11. Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by condition C5. The AQMP must:
- (a) be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary;
 - (b) detail and rank all emissions from all sources of the development, including particulate emissions;
 - (c) detail an ambient air quality monitoring strategy that is capable of evaluating the performance of the development against the air quality criteria in accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales;

- (d) identify the control measures that will be implemented for each emission source, including enclosing the crushing equipment and sand washing plant, regularly sweeping the haulage road and watering the stockpiles; and
- (e) nominate the following for each of the proposed controls:
 - (i) key performance indicator;
 - (ii) monitoring method;
 - (iii) location, frequency and duration of monitoring;
 - (iv) record keeping;
 - (v) complaints register;
 - (vi) response procedures; and
 - (vii) compliance monitoring.

B12. The Applicant must:

- (a) not commence operation until the Air Quality Management Plan required by condition B11 is approved by the Planning Secretary; and
- (b) implement the most recent version of the Air Quality Management Plan approved by the Planning Secretary for the duration of the development.

Post-commissioning Air Verification Report

B13. At three months, six months and two years following the commencement of operations, , or within a timeframe as otherwise agreed with the Planning Secretary, a Post-commissioning Air Verification Report (PAVR) must be prepared to the satisfaction of Planning Secretary. The PAVR must be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary and include:

- (a) verification against the air quality criteria, undertaken in accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales
- (b) an outline of management and mitigation measures to address any exceedances of the criteria; and
- (c) a description of contingency measures in the event the management and mitigation measures are not effective in reducing air quality impacts to meet the criteria and timing for implementing and validating the effectiveness of these measures.

SOILS, WATER QUALITY AND HYDROLOGY

Imported Soil

B14. The Applicant must:

- (a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site;
- (b) keep accurate records of the volume and type of fill to be used; and
- (c) make these records available to the Planning Secretary upon request.

Erosion and Sediment Control

B15. Prior to the commencement of any remediation or construction for the development, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the *Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book* (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.

Discharge Limits

B16. 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.

Stormwater Management System

B17. Prior to the commencement of operation, the Applicant must design and install a stormwater management system for the development. The system must:

- (a) be designed by a suitably qualified and experienced person(s);
- (b) be generally in accordance with the conceptual design in the RTS and the Additional Information;
- (c) be in accordance with applicable Australian Standards;
- (d) ensure that the system capacity has been designed in accordance with *Australian Rainfall and Runoff* (Engineers Australia, 2016) and *Managing Urban Stormwater: Council Handbook* (EPA, 1997) guidelines;
- (e) ensure all water discharged to Bow Bowing Creek is treated prior to discharge;
- (f) divert existing clean surface water around operational areas of the site.

Flood Management

- B18. Prior to the commencement of construction, the Applicant must prepare a Flood Emergency Response Plan to the satisfaction of the Planning Secretary. The Plan must form part of the CEMP and OEMP required by Conditions C2 and C5 and must:
- (a) be prepared by a suitably qualified and experienced person(s);
 - (b) address the provisions of the *Floodplain Risk Management Guideline* (OEH, 2007);
 - (c) include details of:
 - (i) the flood emergency responses for both construction and operation phases of the development;
 - (ii) predicted flood levels;
 - (iii) flood warning time and flood notification;
 - (iv) assembly points and evacuation routes;
 - (v) evacuation and refuge protocols; and
 - (vi) awareness training for employees and contractors.
- B19. The Applicant must:
- (a) not commence construction until the Flood Emergency Response Plan required by condition B18 is approved by the Planning Secretary; and
 - (b) implement the most recent version of the Flood Emergency Response Plan approved by the Planning Secretary for the duration of the development.
- B20. All floor levels must be no lower than the 1% Annual Exceedance Probability flood plus 500 mm of freeboard.
- B21. Any structures below the 1% Annual Exceedance Probability plus 500 mm of freeboard must be constructed from flood compatible building components.
- B22. The Applicant must register an easement under Section 88A and/or restrictions or public positive covenants under Section 88E of the *Conveyancing Act 1919* to drain flood water along the site's southern boundary in consultation with Council.

Water Management Plan

- B23. Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must form part of the OEMP required by condition C5. The Water Management Plan must:
- (a) be prepared by a suitably qualified and experienced person(s);
 - (b) detail water use, metering, disposal and management on-site;
 - (c) detail the management of wastewater streams on-site;
 - (d) include a **Surface Water Management Plan**, including:
 - (i) a program to monitor:
 - surface water flows and quality;
 - surface water storage and use; and
 - sediment basin operation;
 - (ii) surface water impact assessment criteria, including trigger levels for investigating any potential adverse surface water impacts; and
 - (iii) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.
- B24. The Applicant must:
- (a) not commence operation until the Water Management Plan required by condition B23 is approved by the Planning Secretary; and
 - (b) implement the most recent version of the Water Management Plan approved by the Planning Secretary for the duration of the development.

NOISE

Hours of Work

- B25. The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary.

Table 1 Hours of Work

Activity	Day	Time
Remediation, earthworks and construction	Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm
Truck deliveries and pick-ups	Monday – Friday Saturday Sunday and public holidays	6 am to 7 pm 7 am to 4 pm No work
Operation (including crushing, screening, pugmill and sand washing)	Monday – Friday Saturday Sunday and public holidays	7 am to 6 pm 7 am to 4 pm No work

B26. Works outside of the hours identified in condition B25 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.

Construction Noise Limits

B27. The development must be constructed to achieve the construction noise management levels detailed in *the Interim Construction Noise Guideline* (DECC, 2009) (as may be updated or replaced from time to time). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in the Appendix 2.

Noise Walls

B28. Prior to the commencement of operation of any part of the development, the Applicant must construct the 6-metre high noise walls around the perimeter of the site as described in the EIS and RTS,.

Operational Noise Limits

B29. The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2.

Table 2 Noise Limits (dB(A))

Ref	Location	Morning Shoulder L _{Aeq} (15 minute)	Morning Shoulder L _{Amax}	Day L _{Aeq} (15 minute)	Evening Shoulder L _{Aeq} (15 minute)
A	18 Hebrides Place, St Andrews	52	63	53	53
B	14A Gleneagles Place, St Andrews	52	63	53	53
C	9 Troon Place, St Andrews	52	63	53	53

Note Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy (EPA, 1999) (as may be updated or replaced from time to time). Refer to the plan in Appendix 4 for the location of residential sensitive receivers.

Post-Commissioning Noise Verification Report

B30. Within three months of the commencement of operation and again at a throughput of 450,000 tpa, a noise verification report must be submitted to EPA and submitted to the satisfaction of the Planning Secretary. The report must be prepared by a suitably qualified and experienced acoustic consultant, and include:

- (a) noise monitoring data obtained in accordance with the requirements of the EPL and during full operation of the site
- (b) an analysis of compliance with noise limits specified in condition B29;
- (c) an outline of management actions to be taken to address any exceedances of the limits specified in condition B29; and
- (d) a description of contingency measures in the event management actions are not effective in reducing noise levels to an acceptable level.

Road Traffic Noise

- B31. Prior to the commencement of construction, the Applicant must implement the Driver Code of Conduct required by conditions B1 to minimise road traffic noise and continue to implement the Driver Code of Conduct required by B5 for the life of the development

CONTAMINATION

Unexpected Finds

- B32. Prior to the commencement of construction, the Applicant must prepare an unexpected contamination finds procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the CEMP in accordance with Condition C2 and must ensure any material identified as contaminated is disposed of in accordance with the POEO Act and its associated regulations. Details of the final disposal location and the results of any associated testing must be submitted to the Planning Secretary prior to removal of the contaminated material from the site.

Remediation

- B33. Prior to commencement of construction, the Applicant must remediate the site in accordance with the Remedial Action Plan and Asbestos Management Plan.
- B34. The Applicant must ensure the remediation works are undertaken by a suitably qualified and experienced consultant(s) in accordance with the Remedial Action Plan, Asbestos Management Plan and relevant guidelines produced or approved under the *Contaminated Land Management Act 1997*.
- B35. Within one month of the completion of the remediation works, the Applicant must submit a Validation Report to the satisfaction of the Planning Secretary, which has been prepared, or reviewed and approved, by a consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.

Asbestos

- B36. Any asbestos material encountered on the site must be disposed off-site to an appropriately licensed facility.
- B37. The Applicant must ensure that any asbestos encountered during the remediation and construction works for the development is monitored, handled, transported and disposed of by appropriately qualified and licensed contractors in accordance with the requirements of SafeWork NSW and relevant guidelines, including:
- (a) *Work Health and Safety Regulation 2017*;
 - (b) SafeWork NSW Code of Practice – How to Manage and Control Asbestos in the Workplace September 2016;
 - (c) SafeWork NSW Code of Practice – How to Safely Remove Asbestos September 2016; and
 - (d) *Protection of the Environment Operations (Waste) Regulation 2014*.

WASTE MANAGEMENT

Waste Management Plan

- B38. Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development to the satisfaction of the Planning Secretary. The Waste Management Plan must form part of the OEMP and be prepared in accordance with condition C5. The Plan must:
- (a) detail the type and quantity of waste to be generated during construction and operation of the development;
 - (b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the *Protection of the Environment Operations Act 1997*, *Protection of the Environment Operations (Waste) Regulation 2014* and the *Waste Classification Guideline* (Environment Protection Authority, 2014);
 - (c) detail the materials to be reused or recycled, either on or off site;
 - (d) include the Management and Mitigation Measures included in Appendix 2.
- B39. The Applicant must:
- (a) not commence operation until the Waste Management Plan is approved by the Planning Secretary;
 - (b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary.

Waste Storage and Processing

- B40. Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.

Waste Monitoring Program

- B41. From the commencement of operation of the development, the Applicant must implement a Waste Monitoring Program for the development. The program must:
- (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;
 - (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; and
 - (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 in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.

Statutory Requirements

- B42. All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.
- B43. 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 dispose of all wastes to a facility that may lawfully accept the waste.
- B44. The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.

Pests, Vermin and Priority Weed Management

- B45. The Applicant must:
- (a) implement suitable measures to manage pests, vermin and declared priority weeds on the site; and
 - (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or priority weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area.

Note: For the purposes of this condition, priority weed has the same definition of the term in the Biosecurity Act 2015.

HAZARDS AND FIRE MANAGEMENT

- B46. At least one month prior to the commencement of construction, or within such further period as the Planning Secretary may agree, the Applicant must prepare a Fire Safety Study (FSS) in consultation with FRNSW and to the satisfaction of the operational requirements of FRNSW. A letter confirming satisfaction from FRNSW must be provided to the Planning Secretary. The FSS must:
- (a) consider the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence;
 - (b) be prepared in accordance with FRNSW's guidelines *Fire Safety in Waste Facilities, 2020* and *Access for Fire Brigade Vehicles and Firefighters, 2019*;
 - (c) be prepared in a format generally consistent with Hazardous Industry Planning Advisory Paper No.2 (HIPAP No.2).
- B47. The Applicant must develop and implement an Emergency Response Plan (ERP) no later than two months prior to the commencement of commissioning of the development, or within such further period as the Planning Secretary may agree. The ERP must:
- (a) address foreseeable on-site and off-site fire events and other emergency incidents;
 - (b) detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards);
 - (c) detail other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site;
 - (d) have two copies stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s.
- B48. The Applicant must store all chemicals, fuels and oils used on-site in accordance with:
- (a) the requirements of all relevant Australian Standards; and
 - (b) the NSW EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Manual* if the chemicals are liquids. .

Dangerous Goods

- B49. The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of *Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33* at all times.

Bunding

- B50. The Applicant must store all chemicals, fuels and oils used on-site in appropriately banded 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).

ABORIGINAL HERITAGE

Site Inductions

- B51. The Applicant shall include Aboriginal cultural heritage awareness training in site inductions, to ensure all site workers and contractors are aware of their obligations under the *National Parks and Wildlife Act 1974*.

Unexpected Finds Protocol

- B52. If any item or object of Aboriginal heritage significance is identified on site:
- (a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately;
 - (b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and
 - (c) Heritage NSW must be contacted immediately.
- B53. Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the *National Parks and Wildlife Act 1974*.
- B54. If any archaeological relics are uncovered during the course of the work, then all works must cease immediately in that area. Unexpected finds must be evaluated and recorded and, if necessary, excavated by a suitably qualified and experienced expert in accordance with the requirements of Heritage NSW.

VISUAL AMENITY

Lighting

- B55. The Applicant must ensure the lighting associated with the development:
- (a) complies with the latest version of AS 4282-2019 - *Control of the obtrusive effects of outdoor lighting* (Standards Australia, 2019); and
 - (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.

Signage and Fencing

- B56. All signage and fencing must be erected in accordance with the development plans included in the RTS.

Note: This condition does not apply to temporary construction and safety related signage and fencing.

PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING

ENVIRONMENTAL MANAGEMENT

Management Plan Requirements

- C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:
- (a) details of:
 - (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);
 - (ii) any relevant limits or performance measures and criteria; and
 - (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;
 - (b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;
 - (c) 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 pursuant to paragraph (c) above;
 - (d) 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;
 - (e) a program to investigate and implement ways to improve the environmental performance of the development over time;
 - (f) a protocol for managing and reporting any:
 - (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);
 - (ii) complaint;
 - (iii) failure to comply with statutory requirements; and
 - (g) a protocol for periodic review of the plan.

Note: the Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

- C2. The Applicant must prepare a Construction Environmental Management Plan (CEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.
- C3. As part of the CEMP required under Condition C2 of this consent, the Applicant must include the following:
- (a) Construction Traffic Management Plan (see Condition B1);
 - (b) Erosion and Sediment Control Plan;
 - (c) Community Consultation and Complaints Handling;
 - (d) Flood Emergency Response Plan (see Condition B18).
- C4. The Applicant must:
- (a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and
 - (b) carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

- C5. The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.
- C6. As part of the OEMP required under Condition C5 of this consent, the Applicant must include the following:
- (a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;
 - (b) describe the procedures that would be implemented to:
 - (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;
 - (ii) receive, handle, respond to, and record complaints;
 - (iii) resolve any disputes that may arise;
 - (iv) respond to any non-compliance;

- (v) respond to emergencies; and
- (c) include the following environmental management plans:
 - (i) Traffic (see condition B5)
 - (ii) Air Quality (see condition B11);
 - (iii) Waste (see condition B38);
 - (iv) Flood Emergency Response (see condition B18);
 - (v) Water (see condition B23); and
 - (vi) Landscape.

C7. The Applicant must:

- (a) not commence operation until the OEMP is approved by the Planning Secretary; and
- (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).

REVISION OF STRATEGIES, PLANS AND PROGRAMS

C8. Within three months of:

- (a) the submission of a Compliance Report under condition C14;
- (b) the submission of an incident report under condition C10;
- (c) the submission of an Independent Audit under condition C16;
- (d) the approval of any modification of the conditions of this consent; or
- (e) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review,

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.

C9. 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.

Note: *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.*

REPORTING AND AUDITING

Incident Notification, Reporting and Response

C10. 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 Appendix 4.

Non-Compliance Notification

C11. The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.

C12. 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.

C13. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

Compliance Reporting

C14. Within three months after the first year of commencement of operation of the development, 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 Planning Secretary 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:

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

- C15. 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.

Independent Audit

- C16. Within one year of the commencement of operation of the development, 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:
- (a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)
 - (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
 - (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).
- C17. In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:
- (a) review and respond to each Independent Audit Report prepared under condition C16 of this consent;
 - (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;
 - (c) implement the recommendations to the satisfaction of the Planning Secretary; and
 - (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.

Monitoring and Environmental Audits

- C18. 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&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.

Note: For the purposes of this condition, as set out in the EP&A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.

ACCESS TO INFORMATION

- C19. At least 48 hours before the commencement of construction of the development until the completion of all works under this consent, including remediation, the Applicant must:
- (a) make the following information and documents (as they are obtained or approved) publicly available on its website:
 - (i) the documents referred to in condition A2 of this consent;
 - (ii) all current statutory approvals for the development;
 - (iii) all approved strategies, plans and programs required under the conditions of this consent;
 - (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;
 - (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;
 - (vi) a summary of the current stage and progress of the development;
 - (vii) contact details to enquire about the development or to make a complaint;
 - (viii) a complaints register, updated monthly;
 - (ix) the Compliance Report of the development;
 - (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;
 - (xi) any other matter required by the Planning Secretary; and
 - (b) keep such information up to date, to the satisfaction of the Planning Secretary.

APPENDIX 1 DEVELOPMENT LAYOUT PLANS

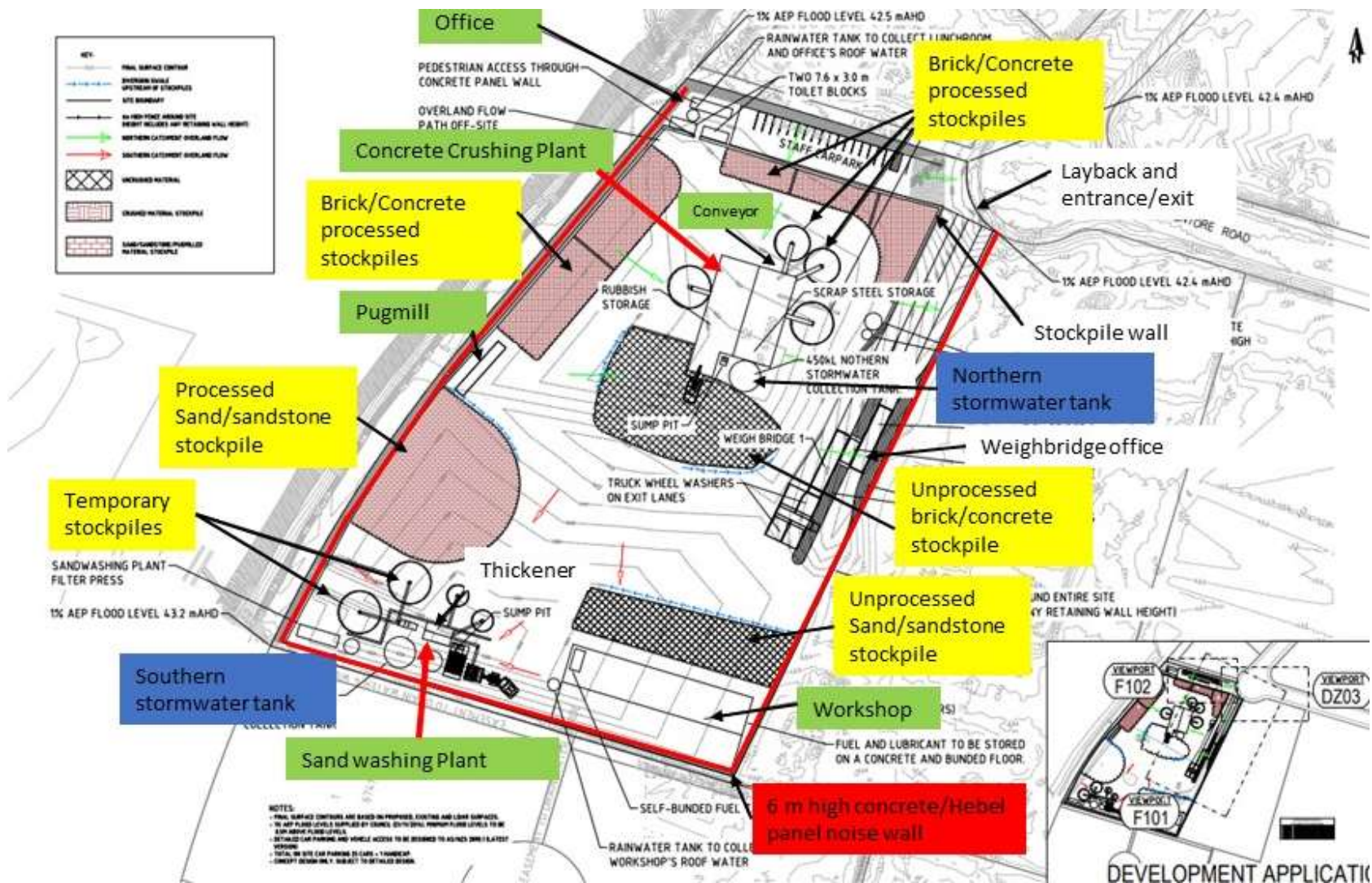


Figure 1: Site Plan(s)

Objectives	APPENDIX 3 Proposed Actions
- To ensure all persons working on the site are aware of: - their environmental obligations. - site environmental issues and control measures. - their roles and responsibilities.	- Environmental induction for all employees and contractors before starting work. Induction to cover the following issues: - requirements of the EMP; - specific environmental issues on the Site and control measures; - roles and responsibilities for environmental management, and - environmental incident procedures. - Retraining sessions within one month of changes to relevant sections of the EMP. - Retraining sessions within one month to persons identified by <i>Complaints Register</i> as not conforming to procedures.
To minimise and manage erosion and sedimentation on the site and ensure that sediment laden runoff is not discharged from the site.	- The Site is graded to direct all surface runoff treatment facilities to meet water quality objectives. - Sedimentation controls are located in the north and south of the Site. Both basins are below ground facilities. - A floating pump will be located in each basin for extraction of

Table 1: Table of Commitments

Management Measure
Induction and Training
Erosion and Sediment Control

Objectives	Proposed Actions
	washing. 4. Detailed design of the proposed treatment facilities is to be undertaken in accordance with Landcom (2004) during the construction certificate stage. 5. Incoming site runoff is directed firstly to an Enviropod to capture sediments, litter, debris, TSS, nutrients, metals, and hydrocarbon. Water is pumped from this pit to holding tanks for reuse on-site. 6. Sediment and erosion control measures are to be maintained in good working order, and be repaired or replaced throughout the entire duration of the works. 7. Sediment and erosion control measures are to be installed, inspected and approved prior to commencement of excavation works. 8. Daily inspection of stockpiles and bunds will be undertaken with issues noted and remedial actions undertaken as soon as feasible where any such issues arise. 9. Entrance street sweeping will be undertaken as required during and after excavation and construction until the Site is fully established. 10. The contractor will maintain dust control until final completion of works. 11. During windy weather, large, disturbed, unprotected

Proposed Actions	Management Measure
areas will be kept moist (not wet) by sprinkling with water to keep dust under control. 12. Erosion and sediment control measures are not to be removed until all site disturbance works are completed and the Site is rehabilitated.	
1. Standard construction work hours will be as follows: - Monday to Friday 7.00 am to 6.00 pm. - Saturday 8.00 am to 1.00 pm. - No work on Sundays or public holiday. 2. Ensure mobile plant used is fitted with residential grade silencers. 3. Plant based at the site must incorporate "quacker" style reversing alarms.	
1. Minimise the area of disturbance. 2. Maintain dust suppression and dust extraction devices to all processing equipment and areas. 3. Maintain the sprinkler system including fine sprays on the conveyors of the processing plant and stockpile sprinklers. 4. Use water cart to suppress dust on roads, truck loading areas and non permanent stockpiles during dry	

Management Measure	Objectives
Noise Management	• To ensure that construction and operation noise complies with EPA regulations. • To minimise impact of noise to surrounding properties. • To ensure employees are not subject to noise levels above those specified in the OH&S legislation.
Air Quality Management	• To minimise dust generation and air pollution to prevent impact on surrounding development. • To ensure employees are not subjected to dust levels above those specified in the OH&S legislation.

Objectives	Proposed Actions
	conditions on days of operation. 10 km/h speed limit on internal roads to minimise dust generation. - All loaded vehicles entering and leaving the Site to be covered. - Regular maintenance of mobile and fixed equipment to minimise exhaust emissions. Although the Site does not accept odorous waste, the following odour management measures are to be implemented for the Site: - Procedures for staff to report the presence of strong odours around the perimeter of the Site. - Spotters should ensure that all loads which are deemed to contain odorous waste are rejected from the Site. A dust management plan will be developed. The following dust management measures will be implemented: - Crusher and sand washing plant are located in a shed. - Crusher will have water sprays and a vacuum dust extraction system into a baghouse. - Engines of trucks and mobile plant to be switched off when not in use. - Maintain and service plant in accordance with

Proposed Actions	Management Measure
manufacturer's specifications. 5. Provide water sprays to suppress visible dust leaving the Site. 6. Limit vehicle speeds to 10km/h. 7. Cover vehicle loads if transporting material off-site. 8. Reduce drop heights during loading and unloading of material. 9. Use water carts to suppress visible dust on unsealed roads (Level 2 watering in excess of 2l/m²/hour or chemical suppressant). 10. Watering of stockpile/exposed areas using a sprinkler dust suppression system. 11. Minimise areas of exposed surfaces. 12. Minimise amount of stockpiled materials. 13. Daily visual surveillance for dust emissions or mud tracking off-site. 14. Daily inspection of dust controls to ensure they are working effectively. 15. Daily inspections for visible dust emissions and dust deposits on surfaces.	

Objectives	Management Measure

Objectives	Proposed Actions
	Mitigation options to reduce energy consumption and greenhouse gas emissions include: 1. Avoid prolonged idling of equipment: Develop a policy about idling times and monitor unnecessary operation. 2. Throttle down and switch off equipment when not in use. 3. Fill fuel tanks to 95% of capacity to allow for expansion and reduce spillage. 4. Perform regular inspection and maintenance. 5. Log fuel use by vehicle and machinery to help identify fuel leaks and poorly performing vehicles. 6. Consider the use of biofuels (Biodiesel or ethanol). 7. Using vehicles with greenhouse gas emissions ratings of a minimum of 7.5 for passenger vehicles and 6 for light commercial vehicles, as described in the Green Vehicle Guide (www.greenvehicleguide.gov.au).
• To minimise waste generated, maximise reuse and recycling, and ensure wastes are managed effectively to minimise impact on the environment. • To encourage the minimisation of waste production and maximisation of resource recovery.	1. Maintain separate receptacles for recyclables to be taken off site for recycling. 2. Non-recyclable waste to be disposed of at registered landfill. 3. No putrescible material to be disposed of on site.

Proposed Actions	Management Measure
4. Encouragement of employees to adopt waste-reducing practices. 5. Paper recycling trays provided in office areas for scrap paper collection and recycling. 6. Printer toner/ink cartridges collected in allocated bins for appropriate contractor recycling. 7. Development of purchasing policy to include purchase of recycled products. 8. Providing recycling collections within each of the offices (e.g. plastics, cans and glass and also paper and cardboard if not collected separately). 9. The office and amenities will have its own waste and recycling storage area where the recycling and garbage bins will be stored prior to collection. 10. Green waste will be mulched and re-used in landscaping on-site or taken off-site for landscape works. 11. Steel will be recycled off-site. 12. Timber will be recycled off-site. 13. Waste oil will be recycled or disposed of in an appropriate manner. 14. All glass which can be economically recycled will be.	
	Waste Management

Management Measure	Objectives
	To identify procedures for waste management.

Objectives	Proposed Actions
	15. Container and paper/cardboard recycling will be provided on-site for employee use. 16. All garbage will be disposed of via a Council approved system. 17. All contaminated and hazardous wastes (i.e. fluorescent tubing, batteries, e-wastes) will be recycled at an appropriately licensed facility. 18. E-waste (electronic waste such as computers, mobile phones, printer toners and ink cartridges) and batteries containing heavy metal contaminants will be recycled at an appropriately licensed recycling facility. 19. Liquid, semi-liquids or moist substances will not be placed in waste containers, unless securely wrapped or contained to prevent the substance from leaking. 20. Any liquid wastes or dangerous goods wastes should be disposed of by a suitably qualified contractor to an appropriately licensed disposal facility. 21. No liquid wastes or wash down waters should be disposed of via the stormwater drainage system.
- To ensure site works are conducted in an appropriate and safe manner. - To ensure site workers operating during the site remediation and construction phases comply with relevant work health and safety (WHS)	All activities must comply with the following WHS requirements in relation to asbestos: - Work Health and Safety Act 2011 (NSW). - Work Health and Safety Regulation 2017 (NSW).

Proposed Actions	Management Measure
- SafeWork NSW (2019), Code of Practice: How to Manage and Control Asbestos in the Workplace. - SafeWork NSW (2019), Code of Practice: How to Safely Remove Asbestos. - WorkCover NSW (2014), Managing asbestos in or on soil. - SafeWork Australia (2005) Code of Practice for the Safe Removal of Asbestos (NOHSC:2002) 2005. All activities must comply with the following environmental regulations and legislation in relation to asbestos: - Protection of the Environment Operations Act 1997 (NSW). - Protection of the Environment Operations (Waste) Regulation 2014 (NSW). - Contaminated Land Management Act 1997 (NSW). - State Environmental Planning Policy No. 55 - Remediation of Land and the Managing Land Contamination - Planning Guidelines. The following actions are to be met when removing asbestos: - If fibro (or bonded) sheeting: a) Do not use power tools. Asbestos fibres can be released if power tools are used for anything	Asbestos Management

Management Measure	Objectives
	regulations. • To ensure persons working within or using the surrounding land remain protected from potential risks originating from the site works. • To ensure the manual removal of construction and demolition wastes (C&D waste) and hand picking of bonded asbestos from asbestos impacted fill soils on site is undertaken in a appropriate manner. • To ensure workers who are involved with asbestos removal hold the appropriate licences and qualifications. • To ensure that asbestos management is undertaken in accordance with the approved Asbestos Management Plan (AMP).

Objectives	Proposed Actions
	other than the removal of screws. b) Wear an Australian Standards Protection Level 2 (P2) minimum half face disposable mask and disposable coveralls. Non-Australian Standard certified masks should not be used where asbestos is present. c) Wet fibro sheets down to reduce dust generation and movement. d) Seal fibro sheets in construction grade plastic. (This should be 200 microns thick). e) Contact Campbelltown City Council for a licensed disposal point in your area. f) If the area of bonded asbestos sheeting (fibro) is over 10m², removal must be undertaken by a licenced asbestos removal contractor. If under this amount, then a license is not required. • Should the asbestos be in powder form or can be crumbled, pulverised or reduced to powder by hand pressure when dry, then an asbestos removal contractor with an AS1 licence is required for its removal. The following documents must be kept on site: • Copies of all Waste Classification Assessment reports and details of disposal.

Proposed Actions	Management Measure
• Safety training records and site inductions completed. • Asbestos clearance certificates for remediated areas of the Site. The procedures detailed by the AMP will be subject to review as required, to ensure the plan reflects any changes in site activities, conditions of consents (to be issued) and meets the relevant legislation and/or codes of practice. The review will assess the effectiveness of the AMP to: • Identify asbestos hazards. • Raising awareness among workers and guiding contractors to complete the required works in accordance with relevant legislation. • Ensure the handling and management of asbestos impacted soils does not pose an unacceptable risk to site workers or users of the surrounding land. • Present accurate information regarding the extent of asbestos impacts and the remediation required at the site. An exclusion zone separating the northern portion of the Site from the southern portion is to be implemented. In addition: • Personnel undertaking asbestos removal works are to be inducted and have licences specific to their activities conducted on site.	

Objectives	Management Measure

Objectives	Proposed Actions
	- Entry to the Asbestos Soil Exclusion Zone will be restricted to workers who have completed a site induction and hold the required licences. All personnel should also sign onto relevant safe work method statements which have been approved by the Site Manager. - A toolbox talk incorporating aspects of occupational health and hygiene is to be undertaken prior to any asbestos soil works being undertaken on the Site. - All workers are to be made aware of the identified hazards on the Site and the management procedures for anticipated or unexpected soil contamination hotspots. - Additional training related to the correct use and maintenance of respirators for those workers in the asbestos soil removal exclusion zone will also be demonstrated. - Records will be maintained for personnel who have completed site induction training. Where required, updates on training and awareness will be provided at pre-starts and/or toolbox talks. The following responsibilities are provided: <u>HazMat Consultant</u> - Prepare AMP.

Proposed Actions	Management Measure
• Provide on-site guidance to Site Manager on proper implementation of measures and procedures described in the AMP. • Remain on site to ensure the materials are disposed of in the location specified, as communicated by the Site Manager and/or the Project Manager. • Provide inspections of encapsulated contaminated areas. <u>Site Manager</u> • Undertake a toolbox talk on asbestos removal for all workers on the Site. • Oversee the appropriate implementation of the asbestos soil control measures and procedures described in the AMP. • Notify the HazMat Consultant when unexpected finds are found during the fill/excavation process. • Monitor site works and take appropriate action to ensure that all workers in the Asbestos Soil Removal Exclusion Zone comply with the requirements of the AMP. • Oversee the excavation works of all soils impacted with asbestos. • Review current control measures and improve, where applicable (i.e. should site conditions change). This may include improved work practices, use of further control	

Objectives	Management Measure

Objectives	Proposed Actions
	measures, or changing the work methodology and will be discussed during the Safety Induction. <u>Project Manager</u> • Ensure there are adequate resources for the safe management of asbestos-impacted soils on the Site. • Ensure that asbestos materials are disposed of in the locations specified as communicated by the Site Manager and/or the Project Manager. • Ensure that a Registered Surveyor undertakes a survey of the location of the asbestos cell including the boundary with top and bottom surface coordinates. <u>Site Workers</u> • All personnel working within the Asbestos Soil Removal Exclusion Zone must comply with the requirements of this AMP and follow the directions of the Site Manager. • All other site workers (not working within the Exclusion Zone) should work indoors and/or remain clear of the soil excavation works.
• Develop a stormwater management system to prevent potential off-site water quality and quantity impacts. • Develop a stormwater reuse system.	1. Install and maintain water management structures to contain and treat all rainfall and runoff. 2. Erosion and sediment control works to be implemented in accordance with EMP 2.

Proposed Actions	Management Measure
3. Minimise the area of disturbance. 4. Maintain sediment basins and water storage devices on site to store stormwater collected on the site for re-use in dust mitigation. 5. Rainwater from the office and lunchroom building and workshop building roof is to be collected and stored in rainwater tanks and used for toilet flushing. 6. Stormwater from other roofs and hardstand areas is to be collected and stored for dust suppression via sprinklers and water cart and sand washing. 7. Town water will be used for potable uses and to supplement other supplies as required. 8. A thickener to treat stormwater. 9. Incoming site runoff is directed firstly to an Enviropod to capture coarse sediments. Water is pumped from to holding tanks for reuse on-site. 10. The two facilities will have their water pumps controlled by an automated system using level sensors in the facilities, which will pump the water to the tank farms. Each facility will have two (2) pumps installed in the case of a failure of one of the pumps and telemetry for alarm when the Site is unattended. 11. Treated flow from the thickener will be discharged to a stormwater storage tank. Water stored in the tank will	Stormwater Management

Management Measure	Objectives
	• Demonstrate compliance with relevant Water Sharing Plans (WSP). • Provide an impact assessment of the proposed development on the adjacent Bow Bowing Creek environment. • Provide an assessment of predicted wastewater loads. • Assess groundwater impacts. • To ensure discharge of stormwater from the Site is clear of sediment, downstream ecosystems are protected, and on-site re-use of water is maximised.

Objectives	Proposed Actions
	be used for dust suppression and sand washing. Overflows from the tank will be directed back to the southern treatment facility and treated by a proposed oil and grease arrestor (ie. Humceptor or similar). 12. Runoff from the driveway and the entry section of the car park will be directed to the nearest treatment facility.
- To minimise the impact of trucks on the local road network and local residents. - To comply with approved access and vehicle movements.	1. All new truck drivers to be provided with <i>Site Induction for Drivers</i> form at the site entrance. 2. Drivers to be provided with Site Traffic Management Policy. 3. All loads must be fully covered prior to leaving the Site. 4. 10 kp/h speed limit on internal road. 5. All vehicles are to enter and leave the Site in a forward direction.
To ensure any potential hazards are mitigated.	1. Spill kits in the workshop, processing buildings and adjacent to the diesel fuel tank will be installed. 2. Staff will be trained in spill cleanup procedures and use of the spill kits. 3. A dry powder fire extinguisher will be installed in the workshop and adjacent to the diesel fuel tank. 4. Staff will be trained in the use of first attack fire fighting.

Proposed Actions	Management Measure
5. A procedure for the refuelling of mobile plant will be developed and implemented. 6. All fuel and lubricant to be stored within an approved concrete floored and bunded fuel storage inside the workshop designed in accordance with applicable best practice or regulatory requirements.	
1. Meeting the conditions of the planning consent and to render the Site suitable for the proposed land use. 2. Demonstrating that the proposed remediation strategy for the Site is environmentally justifiable practical and technically feasible. 3. Adopting clean-up criteria appropriate for the future use of the Site to mitigate possible impacts to human health and the environment. 4. Consideration of the principles of ecologically sustainable development in line with Section 9 of the <i>Contaminated Land Management Act 1997</i>.	Traffic Management
5. Minimising waste, as per the <i>Waste Avoidance and Resource Recovery Act 2001</i>. 6. Remediate all contamination at the Site so there are no unacceptable risks to on-site and off-site receptors. 7. Demonstrating that the plans for site management of remediation work consider work health and safety, environmental management, and site contingencies.	Hazard Reduction

Management Measure	Objectives
Remedial Action Plan	- To ensure any site contamination is remediated. - To guide remediation of the Site, by providing detailed procedures which comply with relevant guidelines, yet prevent adverse effects on human and environmental receptors.

Objectives	Proposed Actions
To include provisions for managing Aboriginal cultural heritage values.	- All site workers and contractors will be inducted to the area and informed of their obligations under the National Parks and Wildlife Act 1974. Heritage NSW has noted that "Any Aboriginal cultural heritage awareness inductions would benefit from the involvement of Aboriginal community representatives". - In the unlikely event that any Aboriginal Objects are found, all activities with the potential to impact the objects must stop. A temporary fence is to be erected around the Aboriginal cultural heritage site, with a buffer zone of at least 10 metres around the known edge. An appropriately qualified archaeologist is to be engaged to assess the findings, and notification is provided to the Heritage NSW. Works should not proceed without advice from Heritage NSW or an appropriately qualified archaeologist. - In the unlikely event that suspected human remains are encountered during construction, all work in the area that may cause further impact, must cease immediately and: - The location, including a 20 m curtilage, should be secured using barrier fencing to avoid further harm. - The NSW Police must be contacted immediately. - No further action is to be undertaken until the NSW Police provide written notification to Concrete Recyclers.

Proposed Actions	Management Measure
4. If the skeletal remains are identified as Aboriginal, Concrete Recyclers or their agent must contact: Heritage NSW in the Dept of Premier and Cabinet and Enviroline on 131 555; and representatives of the Registered Aboriginal Parties (RAPs). 5. No works are to continue until the Heritage NSW provides written notification to the proponent or their Agent.	Aboriginal Heritage
1. Complaints telephone number signposted at front gate. Telephone number, along with postal and email address for complaints advertised on website. 2. All complaints/concerns raised by local community/relevant authorities to be recorded on <i>Complaints Register</i> by Environmental Officer. <i>Complaints register</i> to be retained on site. 3. All complaints to be brought to the attention of the Environmental Officer immediately. 4. Environmental Officer to identify and initiate appropriate action in response to complaint and follow-up contact with complainant. 5. Any complaints received to be reviewed to ascertain if site management requires amendment.	

Management Measure	Objectives
Complaints Management	• To ensure any site problems brought to the attention of Camolaw Pty Ltd by the local community and/or relevant authorities are documented and acted upon to avoid re-occurrence.

APPENDIX 4 INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS

WRITTEN INCIDENT NOTIFICATION REQUIREMENTS

1. A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition C10 or, having given such notification, subsequently forms the view that an incident has not occurred.
2. Written notification of an incident must:
 - (a) identify the development and application number;
 - (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
 - (c) identify how the incident was detected;
 - (d) identify when the applicant became aware of the incident;
 - (e) identify any actual or potential non-compliance with conditions of consent;
 - (f) describe what immediate steps were taken in relation to the incident;
 - (g) identify further action(s) that will be taken in relation to the incident; and
 - (h) identify a project contact for further communication regarding the incident.

INCIDENT REPORT REQUIREMENTS

3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.
4. The Incident Report must include:
 - (i) a summary of the incident;
 - (j) outcomes of an incident investigation, including identification of the cause of the incident;
 - (k) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
 - (l) details of any communication with other stakeholders regarding the incident.

APPENDIX 5 LOCATION OF RESIDENTIAL SENSITIVE RECEIVERS



M^CLAREN TRAFFIC ENGINEERING

Address: Shop 7, 720 Old Princes Highway Sutherland NSW 2232
Postal: P.O Box 66 Sutherland NSW 1499

Telephone: +61 2 8355 2440
Fax: +61 2 9521 7199
Web: www.mclarentraffic.com.au
Email: admin@mclarentraffic.com.au

Division of RAMTRANS Australia ABN: 45067491678 RPEQ: 19457

Transport Planning, Traffic Impact Assessments, Road Safety Audits, Expert Witness

6 August 2024
Concrete Recyclers Ptd Ltd
PO Box 212
Concord NSW 2137
Attention: Anthony Males

Reference: 200756.02FD

OPERATIONAL TRAFFIC MANAGEMENT PLAN AND DRIVER'S CODE OF CONDUCT FOR THE PROPOSED RESOURCE RECOVERY FACILITY AT 7 MONTORE ROAD, MINTO

Dear Anthony,

Reference is made to your request to provide an Operational Traffic Management Plan (OTMP) and Driver's Code of Conduct (DCC) in regards to the proposed resource recovery facility at 7 Montore Road, Minto.

An OTMP, including driver's code of conduct, has been prepared and is attached in **Appendix A**. It is recommended that the attached OTMP and Code of Conduct be implemented on site and be submitted as part of any future development applications for the site.

Please contact the undersigned should you require further information or assistance.

Yours faithfully
M^CLaren Traffic Engineering



Craig M^CLaren
Director

BE Civil. Graduate Diploma (Transport Eng) MAITPM MITE [1985]
RMS Accredited Level 3 Road Safety Auditor
RMS Accredited Traffic Control Planner, Auditor & Certifier (Orange Card)

APPENDIX A: OPERATIONAL TRAFFIC MANAGEMENT PLAN AND DRIVER CODE OF CONDUCT FOR RESOURCE RECOVERY FACILITY AT MONTORE ROAD, MINTO

Issue	Approved by Traffic Engineer (DATE)	Approved by Proprietor (DATE)	Adopted Date
A	Craig M ^C Laren (6/07/2022)		
B	Daniel Walker (21/06/2024)		
C	Daniel Walker (23/07/2024)		
D	Daniel Walker (6/08/2024)		

1 INTRODUCTION

1.1 Background

McLaren Traffic Engineering was commissioned in May 2022 by *Concrete Recyclers Pty Ltd* to prepare an Operational Traffic Management Plan (OTMP) and Driver Code of Conduct (DCC) for the proposed resource recovery facility at 7 Montore Road, Minto. The OTMP and DCC is in response to Development Consent SSD 5339 condition B5.

1.2 Site Description

This OTMP and DCC applies to the subject site, being 7 Montore Road, Minto, which is also known as Lot 52 DP628900. The site map is presented in **Appendix I**.

1.3 Site Operating Hours

The hours of operation will be Monday to Friday, 7:00am to 6:00pm and Saturday, 7:00am to 4:00pm. The site will not be in operation on Sundays or public holidays.

1.4 Frequency of Vehicular Movements

It is expected that there will be approximately 171 trucks arriving to and from the subject site each weekday and approximately 106 trucks arriving to and from the subject site each weekend day (Saturdays only, see above).

It is expected that during the peak hour the site will serve a total of 42 vehicle trips (21 inbound and 21 outbound).

1.5 Objective

This OTMP & DCC, reproduced below in part, for the proposed resource recovery facility at Montore Road, Minto applies to all vehicular traffic entering, exiting and moving within the site and within the public road network to maximise safety for staff and contractors of the recycling facility and other road users.

1.6 Definitions

The following terms are defined for use specific to this OTMP and DCC:

- Staff – refers to Resource Recovery employees.
- Parties – refers to all contractors, truck drivers, heavy vehicle drivers, light vehicle drivers, employees, sub-contractor employees and visitors to the site.
- Laden Truck - refers to any truck of over 6m in length that is carrying a load, is articulated or is towing a trailer, such as a truck and dog.

2 Modifications To This Operational Plan of Management (Specific To Traffic Management) And Driver Code Of Conduct

2.1 This document is able to be reasonably modified following the consultation with and approval by:

- a) The owner and proprietor of Lot 52 DP618900; and
- b) A suitably qualified traffic engineer with RMS accredited Level 3 road safety auditing qualifications or similar qualifications.

The traffic management component of the OTMP and Driver Code of Conduct should be reviewed every 6 months for the first year of operation and then every 36 months thereafter or sooner if site operation, external road conditions or work practices significantly alter.

2.2 Significant modifications to this document, including but not limited to those that involve changes to external road network that results in changes to vehicle departure routes or changes to the land use on the site, require consultation with and approval by:

- a) The owner and proprietor of Lot 52 DP618900; and
- b) A suitably qualified traffic engineer with RMS accredited Level 3 road safety auditing qualifications or similar qualifications; and
- c) The consent authority of the modifications proposed.

3 Management Procedures

3.1 General Requirements

Heavy vehicle drivers delivering to and from Concrete Recyclers must:

- a) Have undertaken a Site Induction carried out by an approved member of the Concrete Recyclers staff or suitably qualified person under the direction of the Concrete Recyclers management.
- b) Hold a valid driver's license and carry while on duty for the class of vehicle operated.
- c) Operate a vehicle in a safe manner within and external to the Concrete Recyclers site. This includes abiding with Roads and Maritime Services road rules and driving without being under the influence of drugs or alcohol.
- d) Comply with the direction of authorised personnel when within the site.
- e) Participate in the health screen program as detailed in the TruckSafe standards prior to commencing work for Concrete Recyclers.

3.2 Induction

- a) All staff of the resource recovery facility will be provided and notified of the Traffic Management component of this OTMP and Driver's Code of Conduct, prior to or on the first day of attendance.
- b) All parties completing deliveries to and from the site by truck shall be provided and notified of the traffic management component of this OTMP and Driver's Code of Conduct prior to the arrival of that party to the site.
- c) All parties will be required to attend an initial induction meeting with relevant Concrete Recyclers staff on the first day of attendance at the site at which time both documents will be fully explained by Concrete Recyclers staff identifying clearly their obligations when conducting work on the site and when travelling to and from the site.
- d) All parties upon completion of the initial induction meeting will be required to sign an induction attendance sheet at the conclusion of the meeting confirming that they will fully comply with their obligations, requirements and directions in regard to the Traffic Management component of this OTMP and Driver's Code of Conduct.
- e) The induction attendance records / register shall be kept on the premises at all times and be readily available upon request by authorised Council or TfNSW officers.

3.3 Management

- a) Maintain a commitment to ongoing training for heavy vehicle drivers as outlined in the standards.
- b) Ensure vehicles are loaded appropriately including abiding to manufacturer and regulatory requirements of maximum load limits.
- c) Address their duty of care requirements in accordance with NSW Work Health and Safety legislation.
- d) Allow vehicle drivers sufficient time to conduct trips in a legal, compliant and safe manner.

3.4 Driver Specific

To maintain courtesy to individuals and promote positive driver behaviour, drivers must:

- a) Notify Concrete Recyclers management if they are not fit for duty prior to commencing work.
- b) Notify management immediately should their status or conditions of their driver's license change in the anyway.
- c) Not engage with individuals through providing information regarding the Concrete Recyclers operation beyond providing them with the suitable contact details at the site.
- d) Minimise idling of engines.
- e) Ensure that they do not dump litter on haulage routes or on site.
- f) Maintain trucks in a good working order and in a clean and tidy condition.
- g) Not block residential driveways or any other access points.

3.5 Heavy Vehicle Driver Fatigue

Fatigue is one of the biggest causes of crashes for heavy vehicle drivers. The Heavy Vehicle Driver Fatigue Reform was therefore developed by the National Transport Commission (NTC) and approved by Ministers from all States and Territories in February 2007.

The heavy vehicle driver fatigue law commenced in NSW on 28 September 2008 and applies to trucks and truck combinations over 12 tonne GVM (however there are Ministerial Exemption Notices that can apply).

Under the law, industry has the choice of operating under three fatigue management schemes:

- a) Standard Hours of Operation;
- b) Basic Fatigue Management (BFM);
- c) Advanced Fatigue Management (AFM).

All heavy vehicle drivers operating out of the Resource Recovery Facility are to be aware of their adopted fatigue management scheme and operate within its requirements.

3.6 Site Access Arrangements

The development will make use of a single entry/exit driveway on Montore Road. The site access features an access point to the staff carpark area to the east, as well as a three-lane vehicular access catering for vehicles up to and including a 19m long Articulated Vehicle (AV).

The three-lane vehicular access accommodates six (6) queueing spaces at the entrance of the site before the weighbridge to accommodate vehicles waiting to enter the site while another vehicle is being weighed and recorded. Queuing analysis undertaken has determined that the provided standing bays are of sufficient quantity to support a 98th percentile traffic demand of the weighbridge.

3.7 Operating Conditions

The following best practices shall be adopted by all truck drivers hauling from Concrete Recyclers:

- a) Implement best management practice, to minimise the construction, operational and traffic noise of the truck;
- b) Apply and enforce a speed limit of 10km/h for all vehicles on site;
- c) Ensure that waiting trucks do not block the entry to the concrete recyclers site or other driveways;
- d) At commencement of the working day it may be that drivers arrive early. If this occurs drivers are to wait with engines off;
- e) To reduce the impact of vehicle noise at commencement of the working day heavy vehicles waiting for the site to open are to wait with engines off.
- f) Ensure that laden trucks do not use Raby Road between Campbelltown Road and Eagle Vale Drive;
- g) All truck vehicles must be operated and maintained in a safe and roadworthy condition as outlined in the TruckSafe standards and vehicle standards regulations. This includes compliance to the appropriate Australian Vehicle Standards and Design Rules.

These conditions do not apply in the event of a direction from police or other relevant authority for safety or emergency reasons regarding works which may need to be undertaken to avoid loss of life, property loss and/or to prevent environmental harm.

3.8 Vehicular Movement Restrictions

- h) Drivers shall comply with load limits of any given roads on the haulage routes. Load limits of 40 tonnes and 32 tonnes are applied to the bridges over Bow Bowing Creek on Ben Lomond Road and Airds Road respectively. Vehicles entering and exiting the site must abide by the restrictions applied to the bridges. Alternate routes are presented in **Appendix II** along with other routes to / from likely destinations.
- i) All vehicular traffic on site shall not exceed a speed limit of 10km/h.
- j) All vehicles entering and exiting the site are to do so in a forward direction.
- k) All drivers of laden trucks greater than 32-tonnes are to avoid using Raby Road between Campbelltown Road and Eagle Vale Drive at all times, unless in cases of emergency. Refer to **Appendix III**.

3.9 Breakdowns and Incidents

In the case of a breakdown the vehicle must be towed to nearest breakdown point as soon as possible. All breakdowns must be reported to the Concrete Recyclers management and the vehicle protected to minimise the effect as a hazard to traffic. Rapid response from the company is required and drivers must contact the Concrete Recyclers Manager as soon as the stranded vehicle and load are safely secured.

If there is a product spill while loading/unloading or en-route the driver must:

- a) Immediately warn persons in the area who may be at risk;
- b) The Concrete Recyclers manager must immediately be informed so that emergency services can be contacted, and a clean-up initiated;
- c) All spills must be adequately cleaned up and waste disposed of in an appropriate and environmental manner;
- d) Put out warning triangles where it is safe to do so.

Drivers are to ensure that when passing pedestrians/cyclists a safe separation distance exists between trucks and pedestrians as well as a reduction in speed if appropriate.

TABLE 1: OPERATIONAL AND EMERGENCY CONTACT NUMBERS

Organisation	Contact Details
Service NSW Transport Management Centre	131 700
Campbelltown City Council	02 4645 4000
Concrete Recyclers Head Office	02 8832 7400

3.10 Adverse Weather Conditions

In the event of adverse weather conditions, it is essential that drivers take extra care when travelling to and from the site. Drivers are expected to maintain a safe gap between themselves and the vehicle directly in front of them, under all weather conditions. In the case of wet weather or adverse weather conditions it is expected that this gap should be increased to improve the time for a driver to react and brake safely.

Further to the above, drivers should consider allowing for additional travel time during adverse weather conditions.

3.11 Truck Size Limits

No trucks greater than 20m long articulated vehicles will be permitted for the resource recovery operation at the site.

3.12 On-site Parking and Pedestrian Access

A staff car park accommodating 18 car parking spaces is provided on the northern side of the site. Staff are to park their personal vehicles on-site within the car park and avoid parking on-street.

Any pedestrians accessing the site from Montore Road are to enter the site via the on-site car park. The car park shall be signposted “10km/h shared zone” with a supplementary “All Visitors Report to Office” with accompanying directional signage. Pedestrians can utilise the car parking aisle to safely and efficiently access the site office due to the low vehicle volumes and low speed environment car parks. It is noted that pedestrian flows within car parking aisles is common practice and does not require delineated pedestrian paths. Pedestrians are not to walk within the truck loading and unloading areas without appropriate training and inductions by the site management.

3.13 Stockpile Management

The locations of the tip and spread areas when stockpiles are at their maximum are detailed within **Appendix I**. As a result, the swept paths shown in **Appendix I** demonstrate that site circulation is easily possible in the worst-case scenario. It should be noted that there will be more manoeuvring space available on a regular basis than what is shown in **Appendix I**.

The tipping trucks are required to reverse into the tip and spread area to tip their loads. As the tray of the truck tips the truck moves forward to enable the load to be deposited onto the ground. The truck then moves forward and onto the standing areas to enable the material to be spread on the ground. Front loaders will typically be located within the stockpile area or within available space outside of the main circulation path. Once the material is inspected it is pushed into the stockpile, ready for the next load to be tipped.

In addition to the above, a Traffic Control Plan (TCP) has been developed to control the manoeuvring of vehicles throughout the site. The TCP is presented in **Appendix IV**.

4 DRIVER'S Code of Conduct

All staff of the resource recovery facility and any employees contracted to it, whether directly or indirectly, who engage in the movement of delivery trucks or motor vehicles on the site shall abide by the following code of conduct. All drivers of vehicles including employee and contractor truck drivers will be required to sign a register of inducted drivers confirming that they agree to the obligations, requirements and directions in regard to the OTMP and Driver's Code of Conduct. The signed drivers code of conduct register shall be kept on the premises at all times and be readily available upon request by authorised Council or RMS officers.

In the event that a statutory requirement overlaps the scope of this plan then the statutory requirements will take precedence. If there is a real or perceived difference between the statutory regulations and this document then the contractor or staff member must first seek clarification from the proponent on the implementation of that action for which the difference is identified.

- a) Drivers to be appropriately licenced by TfNSW or another Australian state for the vehicle size and combination.
- b) Drivers will abide by the (NSW) Road Rules 2014 as amended at all times when travelling on public roads and within the site.
- c) It is prohibited to be under the influence of alcohol while operating a motor vehicle in accordance with the NSW Road Rules or as specified in contractual agreements for all employees. This specifically includes consumption by any worker who will operate machinery or a vehicle during their work period.
- d) It is prohibited to be under the influence of drugs, other than alcohol, while operating a motor vehicle in accordance with NSW Road Rules or as specified in contractual agreements for all employees. This includes illicit drugs and those which may directly or indirectly have an effect such as those accompanied by the warning of *"This medicine may cause drowsiness and may increase the effect of alcohol. If affected do not drive a motor vehicle or operate machinery"*.
- e) Contractors will specifically be required to abide by this code of conduct and management plan at all times while engaged in performing their duties during their work period. Failure of a contractor to comply with this code of conduct (without due cause) may result in reprimand or severance of employment by the land owner/proprietor in accordance with relevant government policies and contractual agreements for all employees. Failure of compliance will be recorded by Concrete Recyclers staff.
- f) Drivers should adjust their driving speeds and turning movements during times of poor weather including rain, fog and wind. Drivers should also turn on headlights / fog lights during fog weather conditions.

- g) Drivers will comply with the direction of authorised staff when within the site.
- h) Drivers queued in the truck queueing area will travel into the site as far as possible to form the queue. When space becomes available ahead of their vehicle the driver will progress forward into the available space to allow for additional queueing behind the vehicle.
- i) Drivers will follow the nominated vehicle movement routes referred to in the Traffic Management component of the OTMP and **Appendix II**, including movements limited by, prevailing traffic conditions, vehicle size and vehicle mass. Drivers are to obey temporary changes in travel routes as directed by regulatory signage or under the direction of Police or traffic controller at work sites and drive their vehicles in a compliant manner appropriate to the size of the vehicle and road conditions.
- j) Drivers should take consideration to anticipate interactions with other road users, including but not limited to light vehicles, pedestrians and cyclists. This includes keeping a safe gap from all surrounding vehicles and driving with care to anticipate the actions of other users of the road.
- k) Drivers should take care when driving in school zones to avoid potential conflict with school children during starting and leaving hours.
- l) Drivers should consider vehicle noise during all hours of service, however particularly during sensitive hours of concern, including but not limited to, 5am to 7am, and 5pm to 10pm.
- m) Drivers are to avoid using engine breaks near residential and developed areas. Compression braking near or within residential areas should only be used if required for safety reasons.
- n) Care is to be taken to minimise reversing manoeuvres such that reversing alarms sounds incur a minimal noise impact to surrounding developments.
- o) All drivers are to review this Code of Conduct immediately upon entering Concrete Recyclers for the first time.
- p) A register is to be kept detailing all reported incidents and complaints in relation to heavy vehicle driver conduct that takes place external to the resource recovery facility. An example of a template for such register is included within **Appendix V**. The register must include (where relevant) the following information:
 - a. Date of complaint/incident
 - b. Time of complaint/incident
 - c. Name and contact details of the complainant
 - d. Method of complaint receipt

- e. Description of complaint including location, driver details (name and license number) and heavy vehicle details (vehicle registration)
 - f. Disciplinary actions taken to resolve the issue with the driver, and when these actions were taken.
 - g. The response and measures taken to resolve the incident with the complainant.
- q) Causes of complaints/incidences are to be investigated within 7 days of receiving the complaint.

5 Council Consultation

As part of preparing this Operational Traffic Management Plan and Driver's Code of Conduct, Campbelltown City Council (CCC) was consulted as per the following timeline, with a copy of all detailed correspondence provided within **Annexure VI**:

- 12/07/2022 – MTE to CCC – Introduction to project and why we are consulting, with draft Operational Traffic Management Plan attached (OTMP).
- 04/08/2022 – CCC to MTE – Request to submit a S138 application to Council, no feedback on OTMP received.
- 10/05/2024 – MTE to CCC – Follow-up on OTMP feedback.
- 20/05/2024 – Concrete Recyclers to CCC – Follow-up on OTMP feedback.
- 05/06/2024 – Concrete Recyclers to CCC – Follow-up on OTMP feedback.
- 06/06/2024 – CCC to Concrete Recyclers – Comments on OTMP received.

The following comments were received from Adam Urszulak (Campbelltown City Council Coordinator Development Engineering) via email on 6 June 2024.

We have received comments back from Infrastructure Services, who have recommended the plan should include turning paths for all vehicles types that will be entering/exiting the site, including delineating pedestrian pathways.

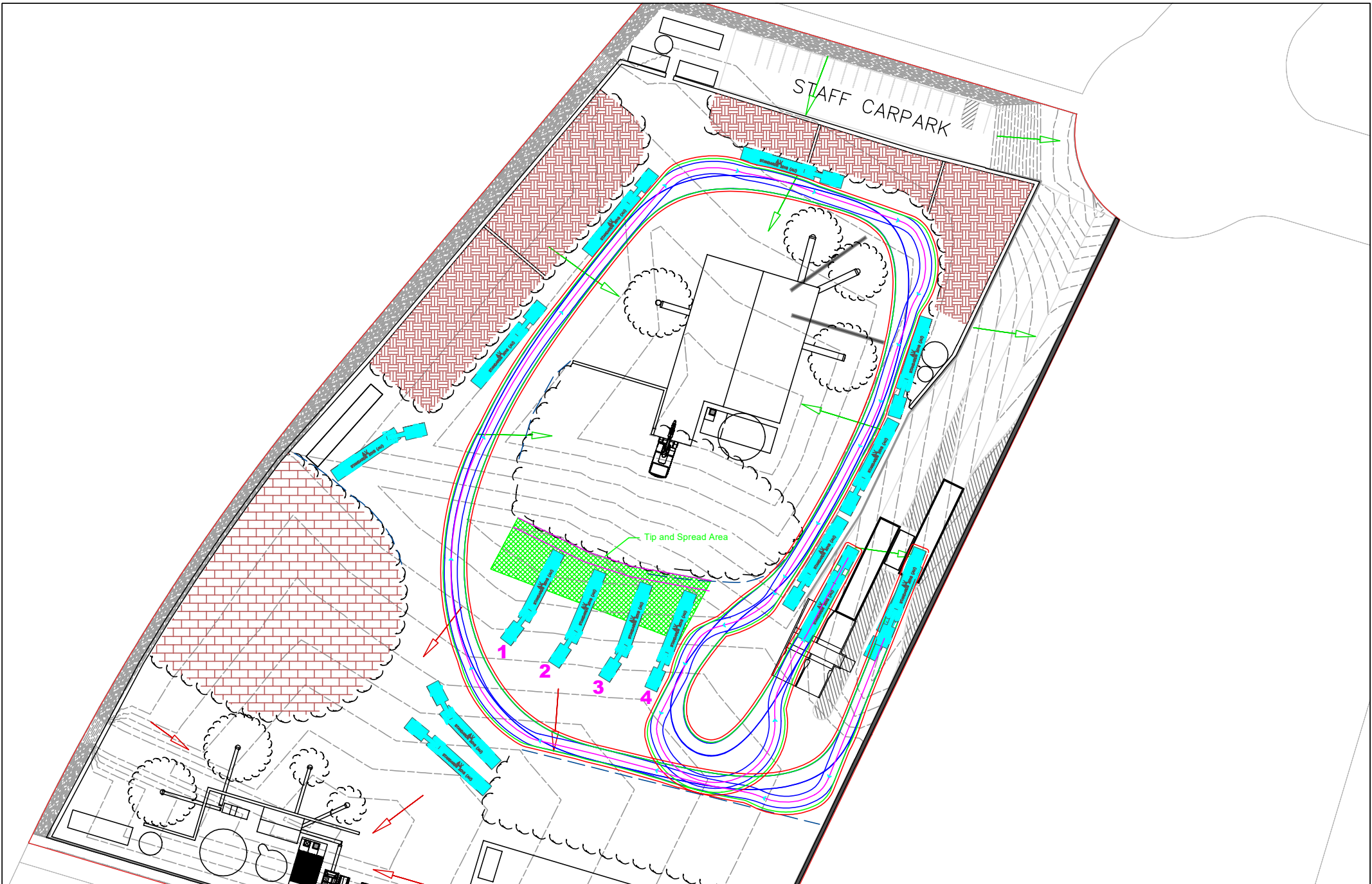
I don't have any further comments.

Please provide further swept path plans and amended report to council when final is sent to the Department.

These comments have been incorporated into the Management Plan within **Section 3.12**.



**APPENDIX I: SITE PLAN & SWEPT PATH TESTS
(12 SHEETS)**



MCLAREN TRAFFIC ENGINEERING
A division of RAMTRANS Australia Pty. Ltd.
Shop 7, 716-720 Old Princes Hwy, Sutherland NSW 2232
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M : 0412 949 578
E : admin@mcclarentraffic.com.au
www.mcclarentraffic.com.au

CLIENT / Project:
Nexus Environmental Planning Pty Ltd

Project Address:
7 Montore Road, Minto

Notes:
CONCEPT PLAN ONLY.
NOT FOR CONSTRUCTION.

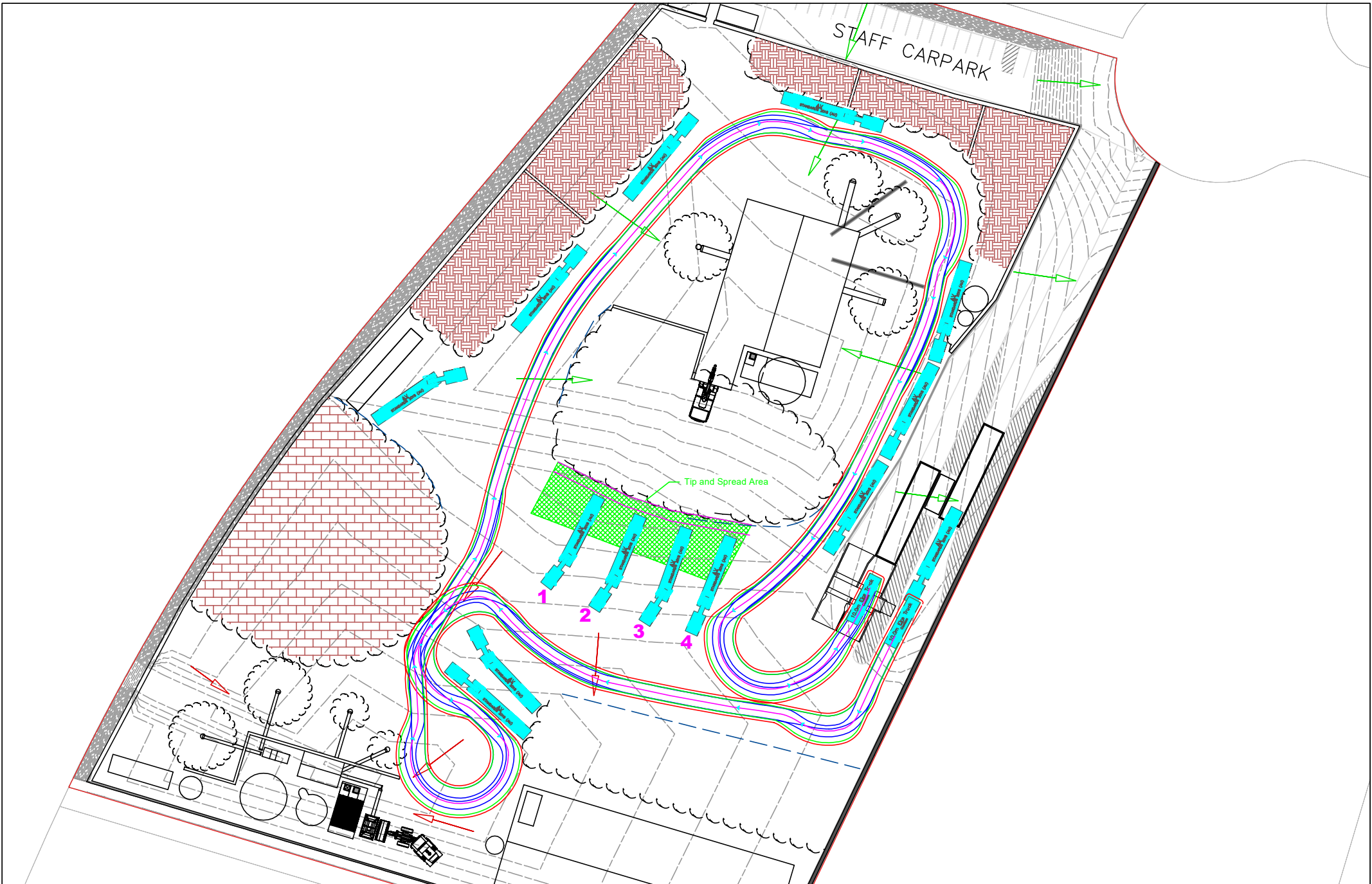
Tested Using:
*AutoTURN 10
*ZWCAD 2019

Drawing Title:
20m Long AV Circulation

Project No: 2021/0276
Drawing No: 2021-276-03E

Revision	Date	Details
A	21/06/2021	
B	18/08/2021	
C	13/12/2021	
D	29/03/2022	
E	7/04/2022	





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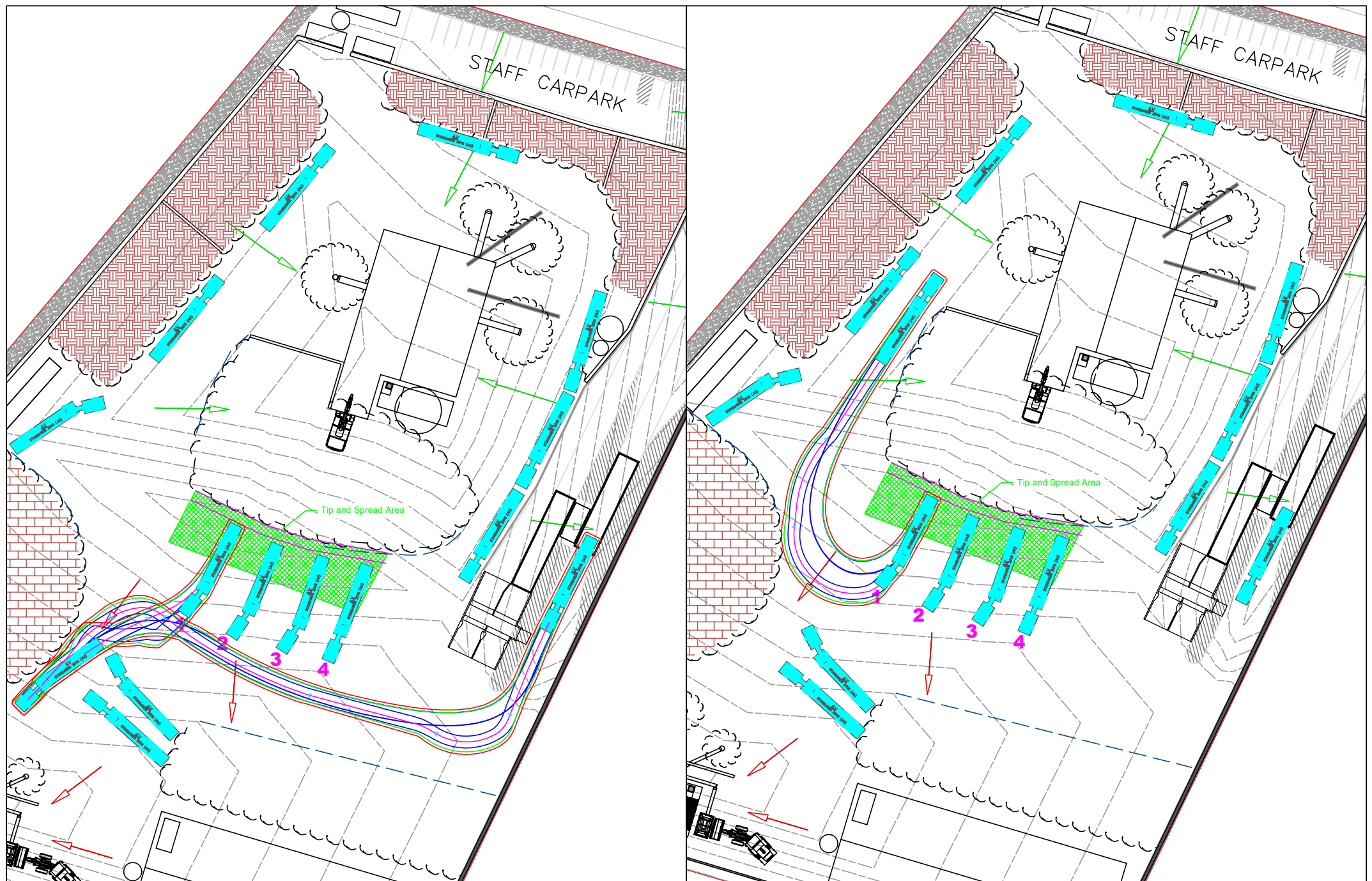
Tested Using:
*AutoTURN 10
*ZWCAD 2019

Drawing Title:
Fire Truck Circulation

Project No:	Drawing No:
2021/0276	2021-276-04E

Revision	Date	Details
A	21/06/2021	
B	18/08/2021	
C	13/12/2021	
D	29/03/2022	
E	7/04/2022	





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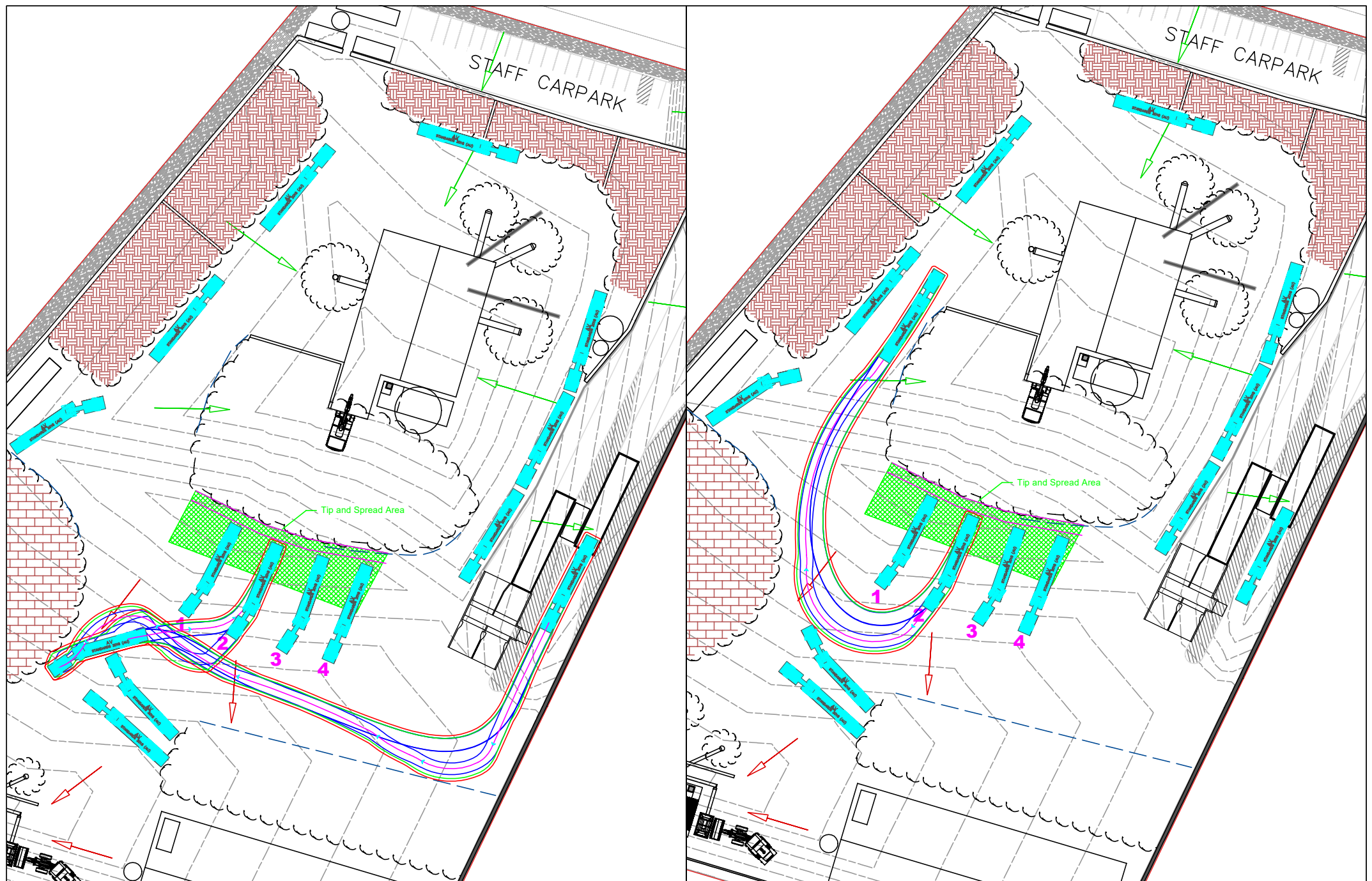
Tested Using:
*AutoTURN 10
*ZWCAD 2019

Drawing Title:
20m AV Unloading Space 1

Project No: 2021/0276
Drawing No: 2021-276-06C

Revision	Date	Details
A	13/12/2021	
B	29/03/2022	
C	7/04/2022	





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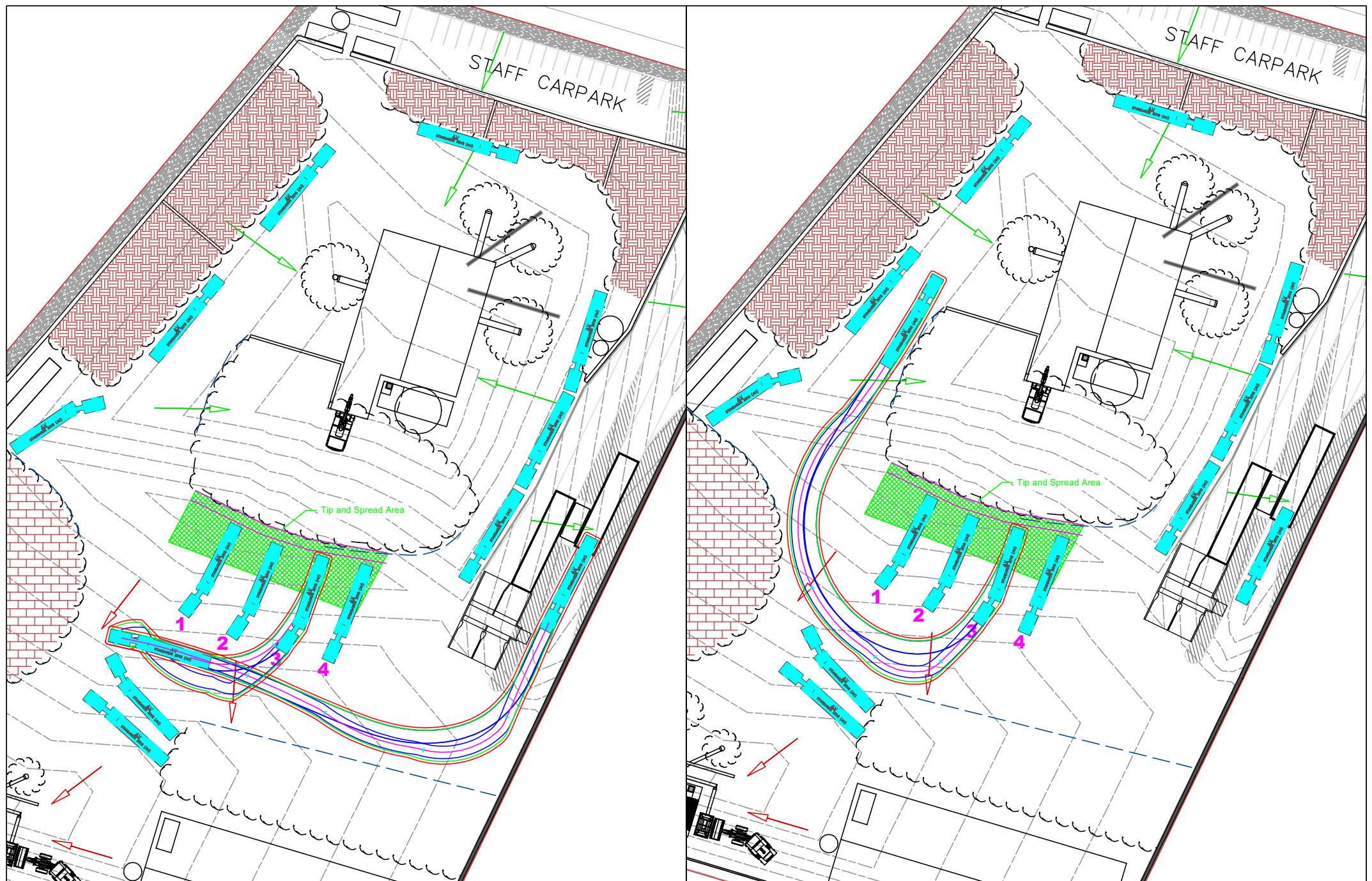
Tested Using:
*AutoTURN 10
*ZWCAD 2019

Drawing Title:
20m AV Unloading Space 2

Project No: 2021/0276
Drawing No: 2021-276-07C

Revision	Date	Details
A	13/12/2021	
B	29/03/2022	
C	7/04/2022	





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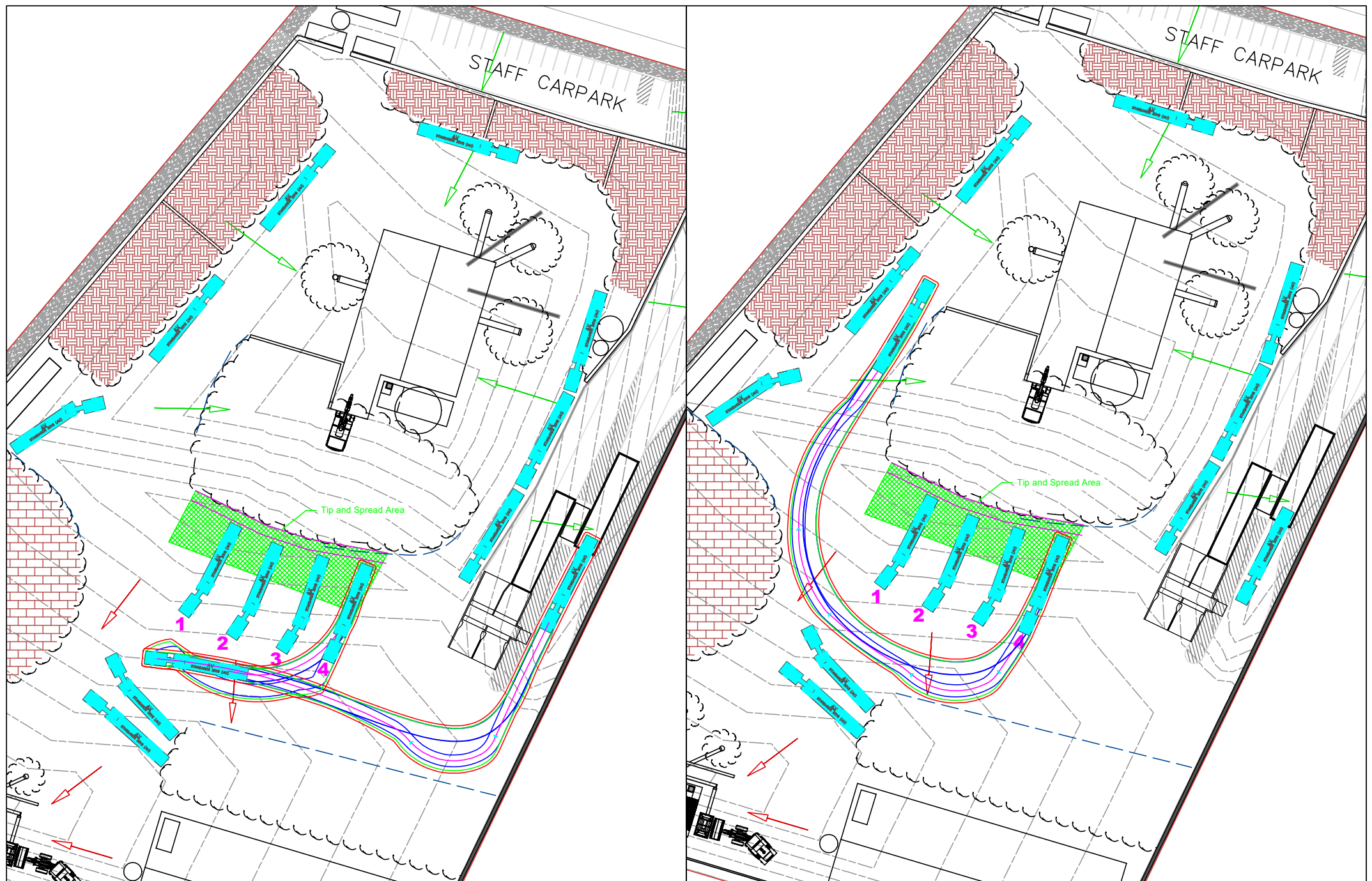
Tested Using:
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*ZWCAD 2019

Drawing Title:
20m AV Unloading Space 3

Project No: 2021/0276
Drawing No: 2021-276-08C

Revision	Date	Details
A	13/12/2021	
B	29/03/2022	
C	7/04/2022	





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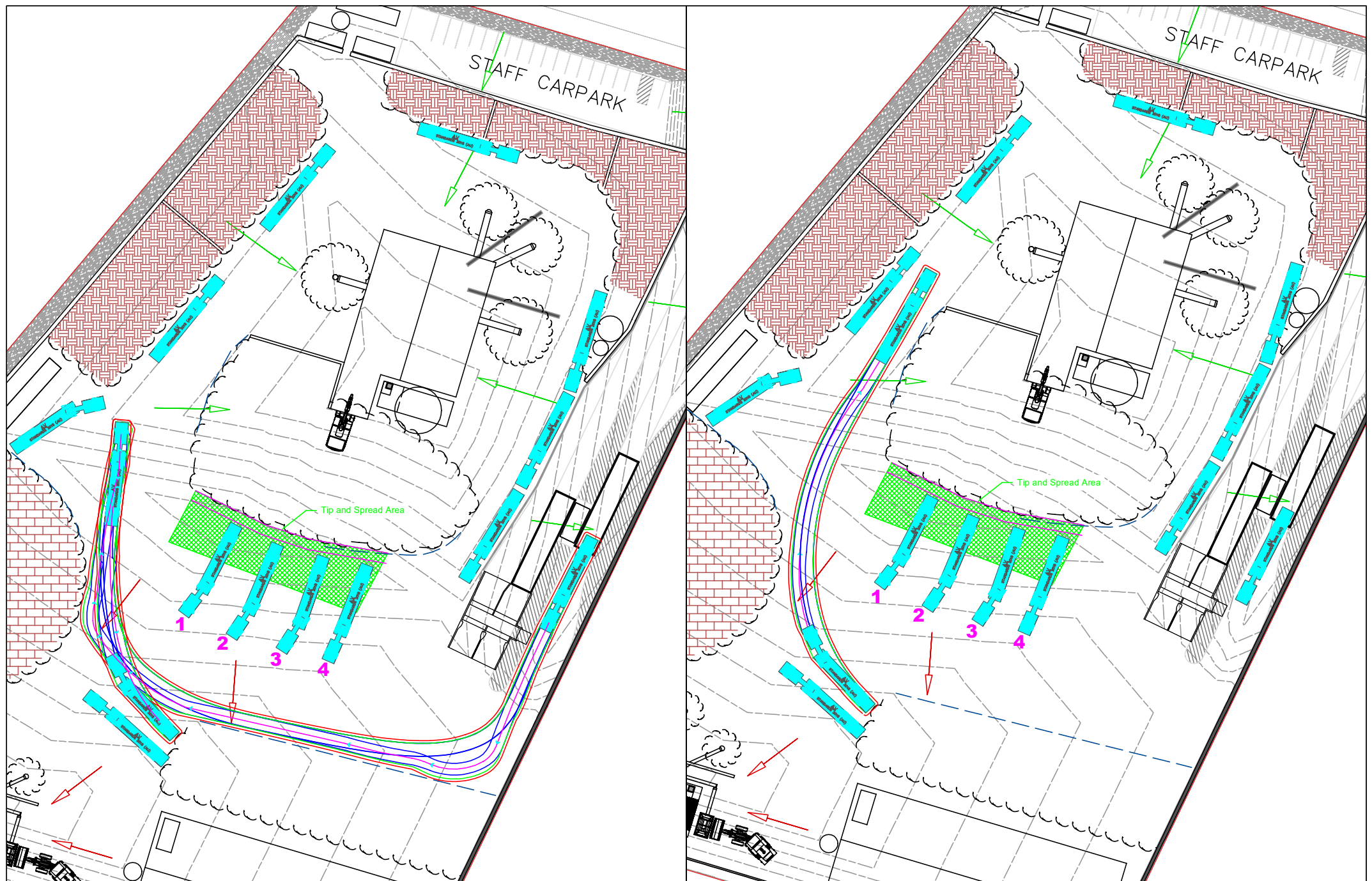
Tested Using:
*AutoTURN 10
*ZWCAD 2019

Drawing Title:
20m AV Unloading Space 4

Project No: 2021/0276
Drawing No: 2021-276-09C

Revision	Date	Details
A	13/12/2021	
B	29/03/2022	
C	7/04/2022	





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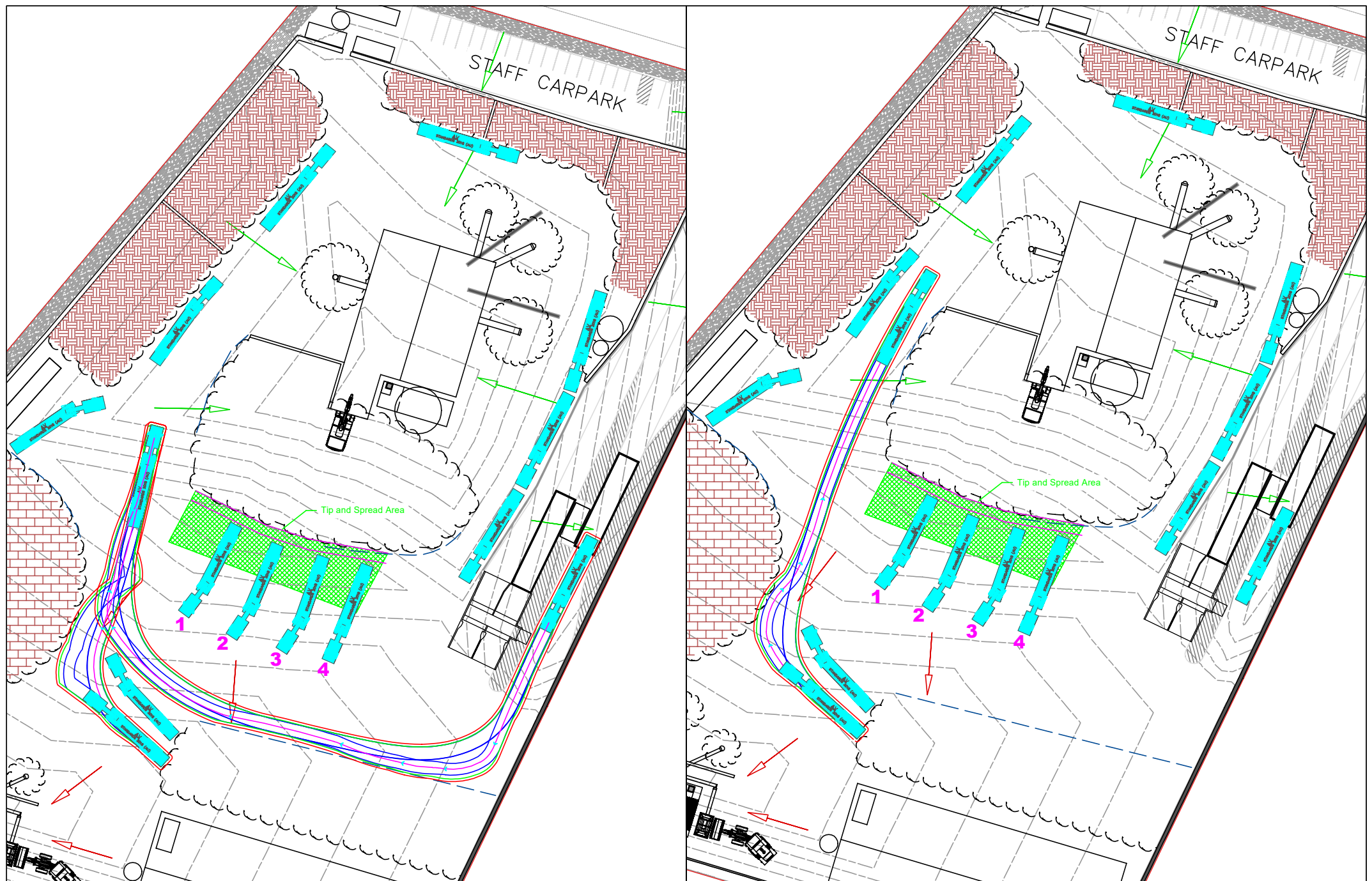
Tested Using:
*AutoTURN 10
*ZWCAD 2019

Drawing Title:
20m AV Unloading Space 5

Project No:	Drawing No:
2021/0276	2021-276-10C

Revision	Date	Details
A	13/12/2021	
B	29/03/2022	
C	7/04/2022	





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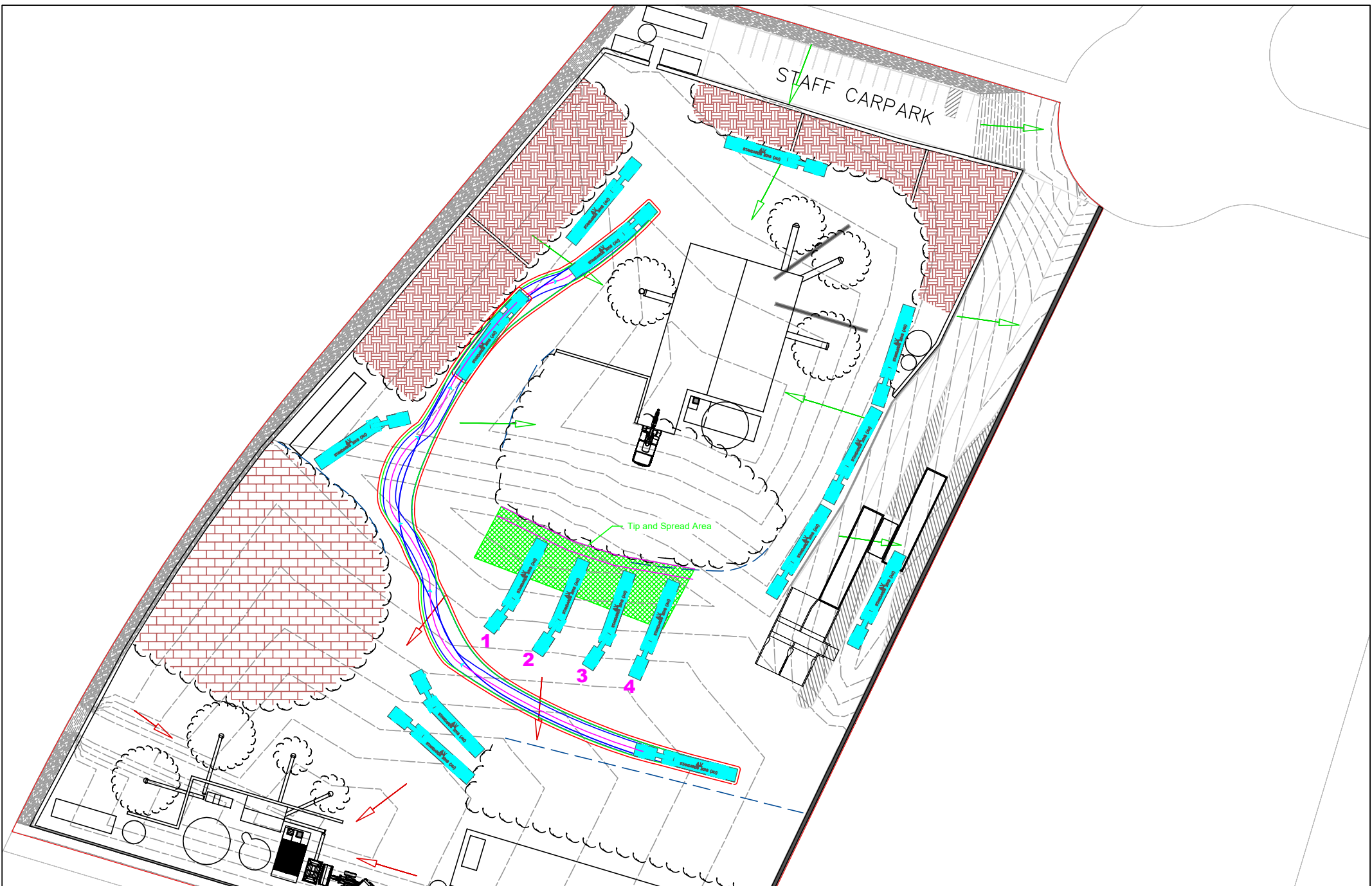
Tested Using:
*AutoTURN 10
*ZWCAD 2019

Drawing Title:
20m AV Unloading Space 6

Project No: 2021/0276
Drawing No: 2021-276-09C

Revision	Date	Details
A	13/12/2021	
B	29/03/2022	
C	7/6/2022	





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CLIENT / Project:
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Project Address:
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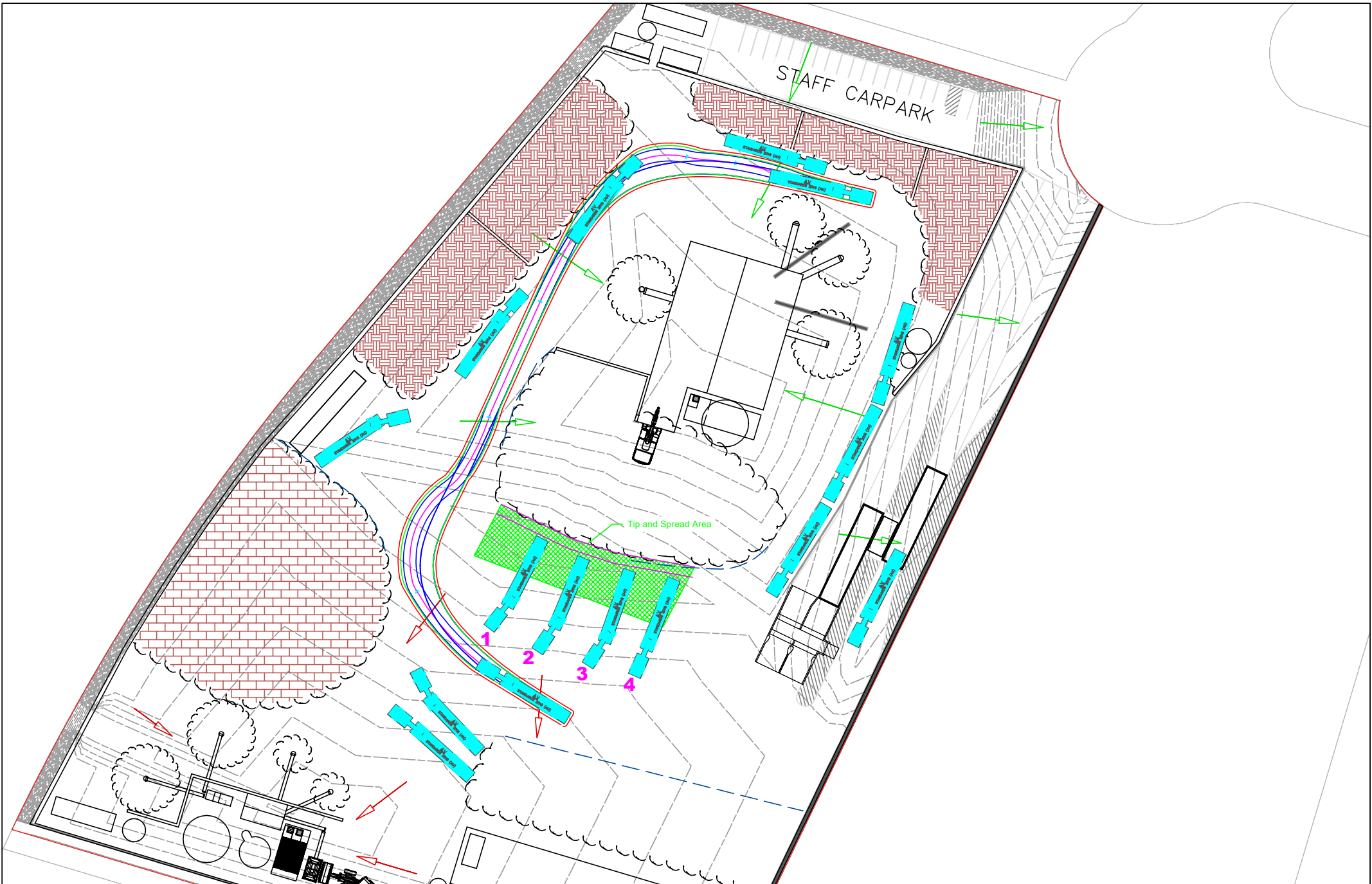
Tested Using:
 *AutoTURN 10
 *ZWCAD 2019

Drawing Title:
 20m AV Unloading Space 7

Project No:	Drawing No:
2021/0276	2021-276-11C

Revision	Date	Details
A	13/12/2021	
B	29/03/2022	
C	7/04/2022	





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CLIENT / Project:
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Project Address:
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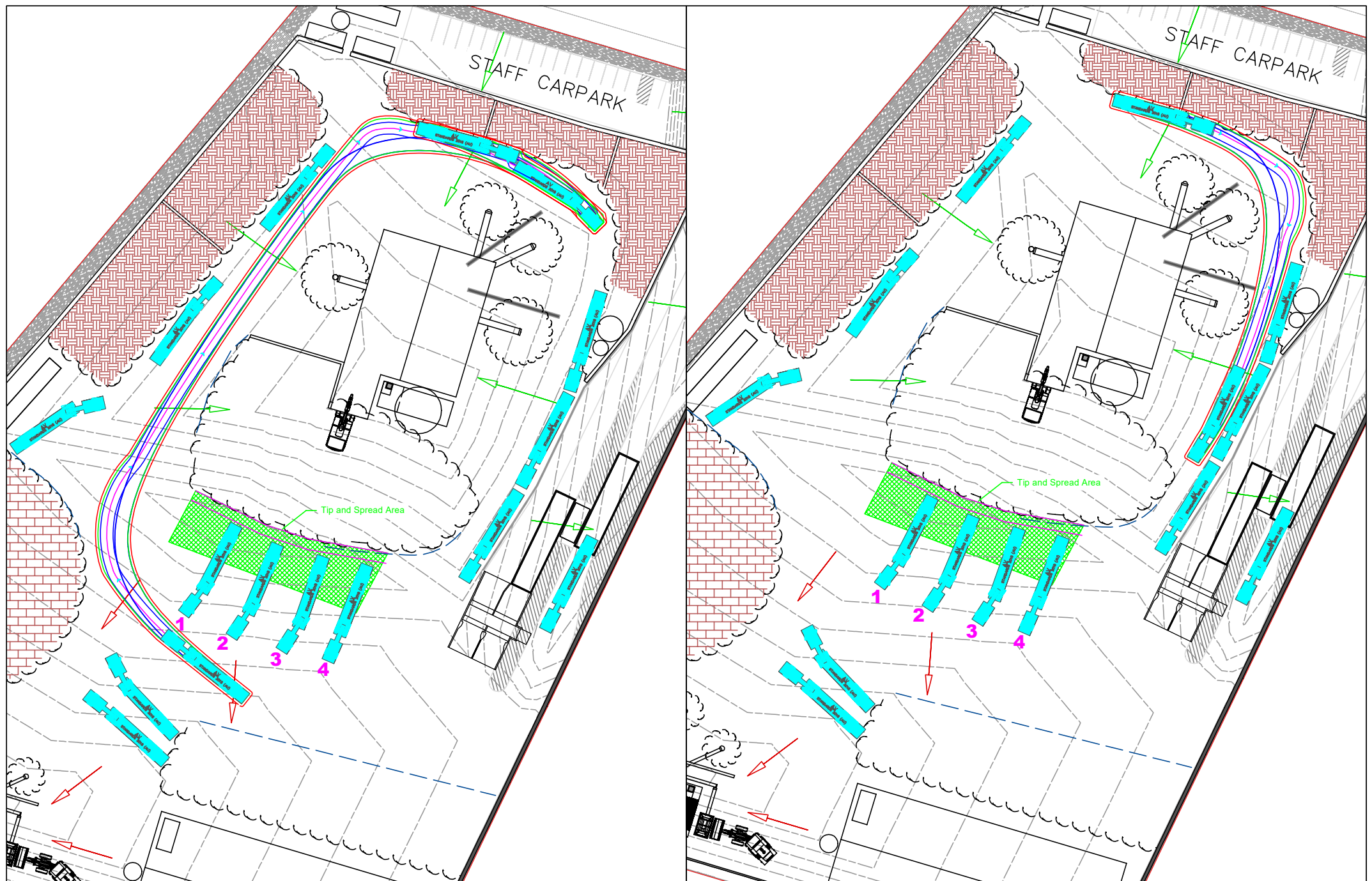
Tested Using:
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*ZWCAD 2019

Drawing Title:
20m AV Unloading Space 8

Project No: 2021/0276
Drawing No: 2021-276-12B

Revision	Date	Details
A	13/12/2021	
B	29/03/2022	





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Project Address:
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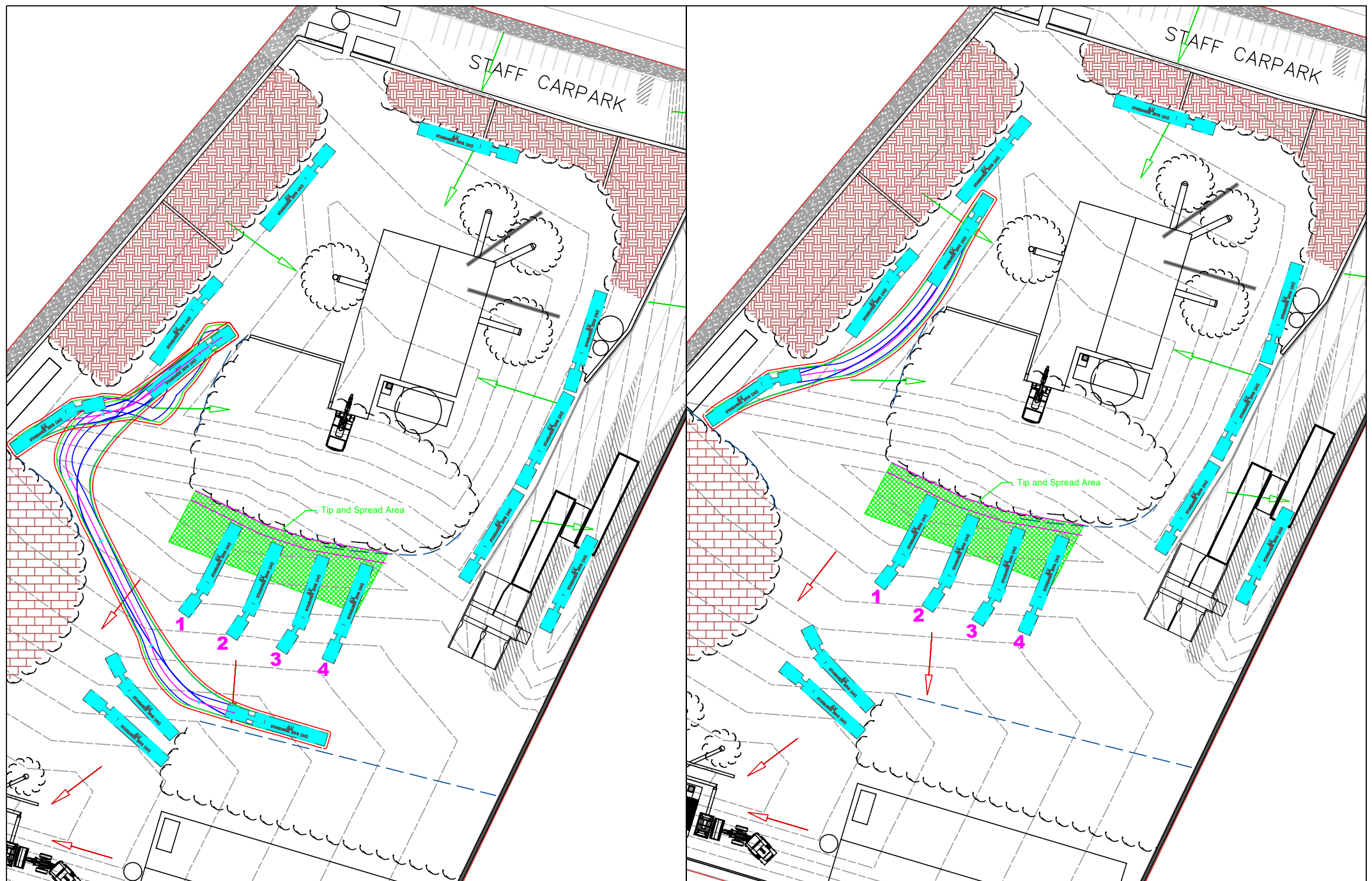
Tested Using:
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*ZWCAD 2019

Drawing Title:
20m AV Unloading Space 9

Project No: 2021/0276
Drawing No: 2021-276-13B

Revision	Date	Details
A	13/12/2021	
B	29/03/2022	





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Project Address:
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Tested Using:
*AutoTURN 10
*ZWCAD 2019

Drawing Title:
20m AV Unloading Space 10

Project No:

2021/0276

Drawing No:

2021-276-14A

Revision	Date	Details
A	29/03/2022	





**APPENDIX II: ROUTE MAPS
(3 SHEETS)**



★ Site Location

ROUTES FOR VEHICLES LESS THAN 32t



★ Site Location

ROUTES FOR VEHICLES BETWEEN 32t AND 40t

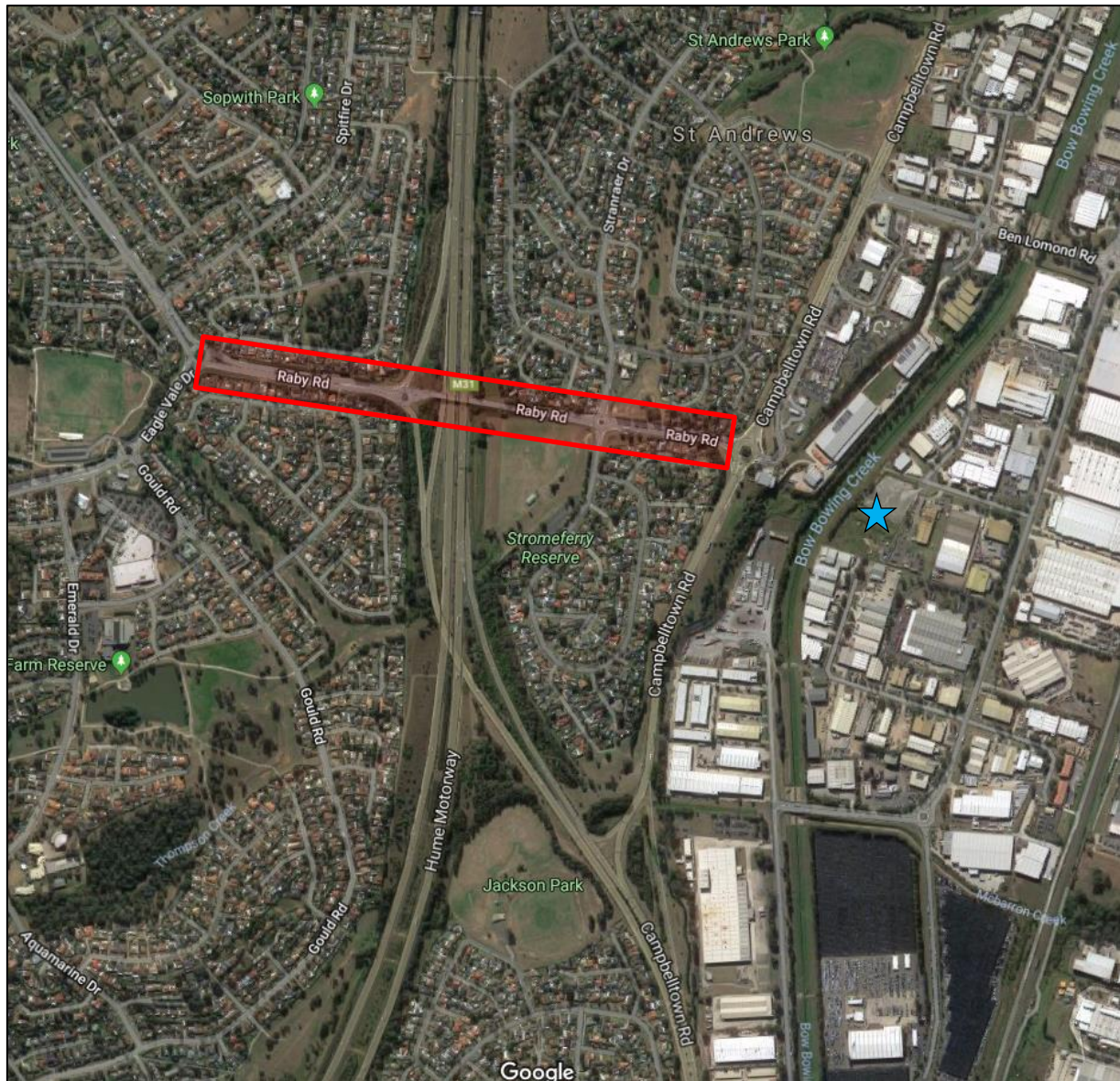


★ Site Location

ROUTES VEHICLES OVER 40t



**APPENDIX III: PROHIBITED ROAD SEGMENT BY LADEN
TRUCKS
(1 SHEET)**



 Prohibited Road Segment by Trucks Greater than 32t
 Site Location

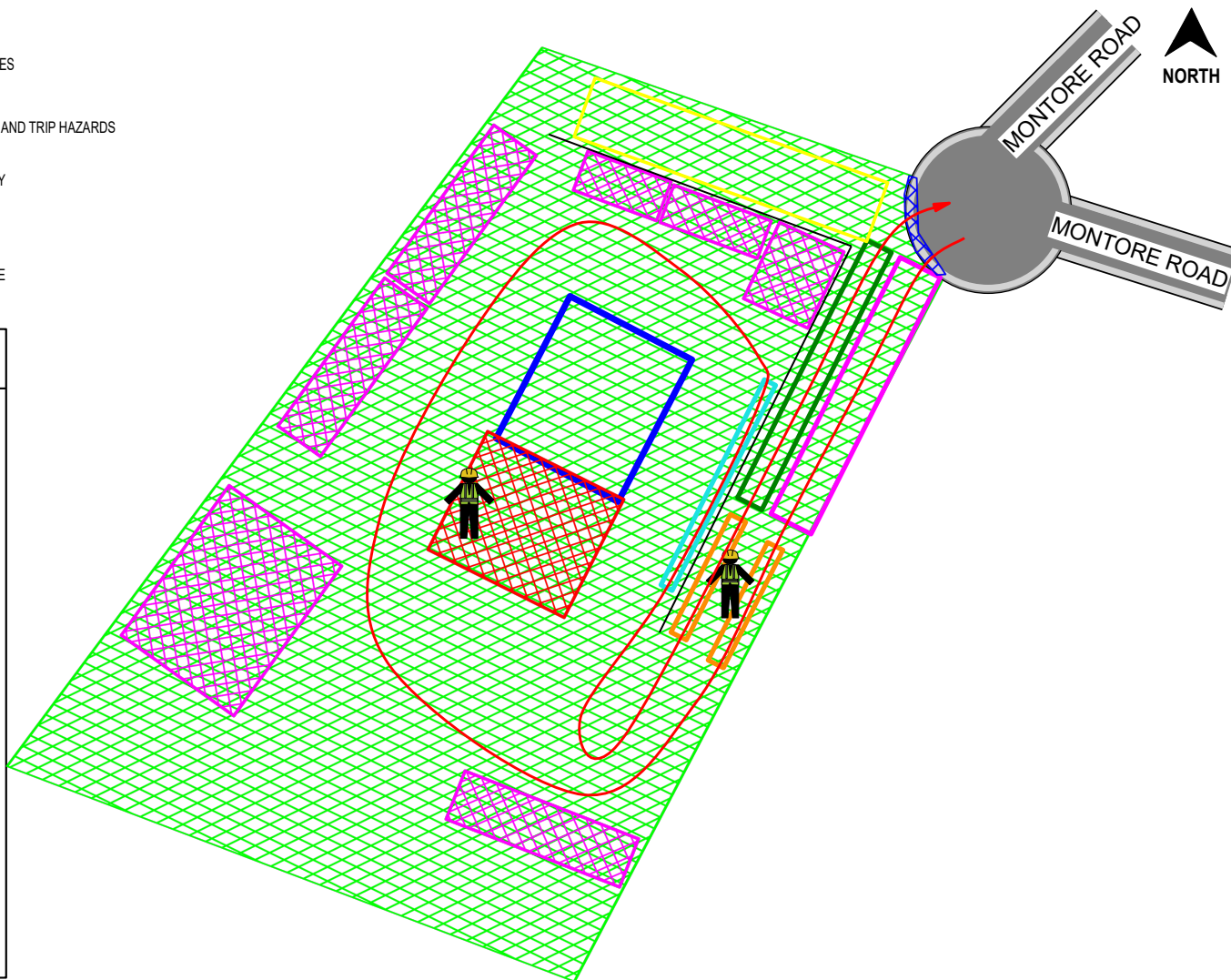


APPENDIX IV: TRAFFIC CONTROL PLAN (TCP)
(1 SHEET)

- ① TRAFFIC CONTROL PLAN TO BE REVIEWED REGULARLY
- ② ALL VEHICLE ACCESS IS RESTRICTED TO 20M LENGTH ARTICULATED VEHICLES WHO WILL ENTER THE SITE VIA A LEFT TURN FROM MONTORE ROAD
- ③ THE PUBLIC VERGE IN FRONT OF THE SITE IS TO BE FREE OF ANY WASTE AND TRIP HAZARDS
- ④ VEHICLES WILL ENTER AND EXIT THE SITE IN A FORWARD DIRECTION ONLY
- ⑤ THERE IS TO BE A MAXIMUM OF 25 STAFF ONSITE AT ANY ONE TIME
- ⑥ VEHICLES MUST FOLLOW ALL ROAD RULES TO GET TO AND FROM THE SITE

Legend

-  Car Park
-  Driveway
-  Heavy Vehicle Path of Travel
-  Processing Plant
-  Site
-  Staff
-  Stockpile
-  Truck Entry and Queueing Lanes
-  Truck Exit
-  Waiting Area
-  Waste Receival and Loader Area
-  Weighbridge



Date: 23/07/2024 Job Number: 2020/756
Address: 7 Montore Road, Minto

TRAFFIC CONTROL PLAN

Author: Daniel Fonken
Certification No: TCT 0016942

NOT TO SCALE



APPENDIX V: INCIDENT REGISTER
(1 SHEET)

Complaint Date and Time	Complainant Name	Complainant Mobile / Email Address	Incidence Location (Road, Suburb)	Driver Name	Driver Licence	Vehicle Registration	Driver Disciplinary Action	Response to Complainant



**APPENDIX VI: COUNCIL CONSULTATION
(6 SHEETS)**



Daniel Walker <daniel@mclarentraffic.com.au>

7 Montore Road, Minto - Concrete Recyclers - Condition B3 & B5 of SSD 5339

Daniel Walker <daniel@mclarentraffic.com.au>

10 May 2024 at 11:11

To: Indira Seneviratne <Indira.Seneviratne@campbelltown.nsw.gov.au>

Cc: Anthony Males <anthony@concreterecyclers.com.au>, council@campbelltown.nsw.gov.au

Hi Indira,

I had previously sent an email to address condition B5 of SSD 5339 for the Concrete Recyclers at 7 Montore Road, Minto (see attached for relevant condition and below for previous email chain).
I never received any further comments from Council's City Delivery section.

I have now received comments from the Department of Planning and Environment as per the below:

- *The OTMP does not meet the requirement outlined in Schedule 2 Condition B5(b) for consultation with Council.*

Can you please advise if comments from Council's City Delivery section were ever received. Or have the section provide comments on the OTMP.

I have attached the OTMP for your reference.

Please do not hesitate to contact me if you have any questions.

Kind regards,

On Thu, 4 Aug 2022 at 10:23, Indira Seneviratne <Indira.Seneviratne@campbelltown.nsw.gov.au> wrote:

Hi Daniel,

With regard to the Condition B3, please submit a S138 application to Council with detailed engineering plans on the works proposed within the public land. The S138 application and relevant documentation should be submitted through the planning portal. The required fees need to be paid to Council for assessment and inspection of the proposed works.

The following information also need to be submitted with the S138 application.

1. Full set of the plans approved with SSD-5339 consent.
2. Dial before you dig information within the proposed work area and additional information if the services conflict with the proposed works
3. Separate swept paths for entry to the site and exit the site for each AV for clarity.

If any vehicle parking areas have been proposed adjacent to the AV travel paths, swept paths should be provided with a relevant vehicle parked in the parking space demonstrating that the 20m long AV can manoeuvre within the designated travel lane. Auto track files also need to be provided with above plans.

4. A design certification from a qualified engineer for the proposed works.

I have forwarded your information to Council's City Delivery section with regard to the Condition B5. When I receive the comments I will forward them to you.

Thank you.

Kind regards,



Indira Seneviratne

Senior Development Engineer

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P: +61 2 4645 4608

E: Indira.Seneviratne@campbelltown.nsw.gov.au

www.campbelltown.nsw.gov.au

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Campbelltown City Council acknowledges and respects the Dharawal people as traditional custodians of this land, and extends these respects to all Aboriginal Elders, past and present, and people from all Aboriginal nations.

From: Daniel Walker <daniel@mclarenttraffic.com.au>

Sent: Tuesday, 12 July 2022 8:44 AM

To: Council <Council@campbelltown.nsw.gov.au>

Cc: Anthony Males <anthony@concreterecyclers.com.au>

Subject: 7 Montore Road, Minto - Concrete Recyclers - Condition B3 & B5 of SSD 5339

Hello,

I am a traffic engineer engaged to respond to Condition B3 & B5 of SSD 5339 for the Concrete Recyclers at 7 Montore Road, Minto (see attached).

Condition B3 requires swept path tests to be submitted to the roads authority showing a 20m articulated vehicle can utilise the access. Please see the attached letter showing the relevant swept path tests.

Condition B5 requires consultation with Council to develop the Operational Traffic Management Plan (OTMP). The OTMP report is attached for your comments and consultation.

If you require any further information or clarification please do not hesitate to contact me.

Kind regards,

--

Daniel Walker

Traffic Engineer

B.E. (Hons) (Schol) (Civil Engineering)

Accredited Level 1 Road Safety Auditor

E: Daniel@McLarenTraffic.com.au P: 02 9521 7199

--

Daniel Walker

Senior Traffic Engineer

B.E. (Hons) (Schol) (Civil Engineering)

Accredited Level 2 Road Safety Auditor

E: Daniel@McLarenTraffic.com.au P: 02 9521 7199



Shop 7, 716-720 Old Princes Hwy, Sutherland NSW 2232
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T 02 9521 7199 | W www.mclarentraffic.com.au

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2 attachments



200756.02FA - OTMP + DCC - July 2022.pdf

11347K



Minto Instrument SSD-5339.pdf

1160K



Daniel Walker <daniel@mclarentraffic.com.au>

7 Montore Road Minto

Anthony Males <anthony@concreterecyclers.com.au>
To: Daniel Walker <daniel@mclarentraffic.com.au>

6 June 2024 at 15:44

Hi Daniel
Can we amend asap thanks
Anthony

[Get Outlook for iOS](#)

Kind Regards,

Anthony Males
General Manager - Operations - Concrete Recyclers (Group) Pty Ltd
02 8832 7400 | 0427 308 437 | www.concreterecyclers.com.au

Locations: Camellia | Terrey Hills | Kurnell | Minto Opening 2024
Socials: [Facebook](#) | [Instagram](#) | [LinkedIn](#)



From: Adam Urszulak <Adam.Urszulak@campbelltown.nsw.gov.au>
Sent: Thursday, June 6, 2024 3:41:42 PM
To: Anthony Males <anthony@concreterecyclers.com.au>
Subject: RE: 7 Montore Road Minto

Hi Anthony,

We have received comments back from Infrastructure Services, who have recommended the plan should include turning paths for all vehicles types that will be entering/exiting the site, including delineating pedestrian pathways.

I don't have any further comments.

Please provide further swept path plans and amended report to council when final is sent to the Department.

Regards,

Regards,



Adam Urszulak

Coordinator Development Engineering

City Planning & Environment

P: +61 2 4645 4608

E: adam.urszulak@campbelltown.nsw.gov.au

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Campbelltown City Council acknowledges and respects the Dharawal people as traditional custodians of this land, and extends these respects to all Aboriginal Elders, past and present, and people from all Aboriginal nations.

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From: Anthony Males <anthony@concreterecyclers.com.au>

Sent: Wednesday, June 5, 2024 10:01 PM

To: Adam Urszulak <Adam.Urszulak@campbelltown.nsw.gov.au>; Daniel Walker <daniel@mclarentraffic.com.au>

Subject: Re: 7 Montore Road Minto

Hi Adam

Do you have an update on this? We are needing to get this finalised urgently so we can get back to the Department of Planning.

Many Thanks

Anthony Males

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Kind Regards,

Anthony Males

General Manager - Operations - Concrete Recyclers (Group) Pty Ltd
02 8832 7400 | 0427 308 437 | www.concreterecyclers.com.au

Locations: Camellia | Terrey Hills | Kurnell | Minto Opening 2024

Socials: [Facebook](#) | [Instagram](#) | [LinkedIn](#)



From: Anthony Males <anthony@concreterecyclers.com.au>

Sent: Monday, May 20, 2024 9:54:08 AM

To: adam.urszulak@campbelltown.nsw.gov.au <adam.urszulak@campbelltown.nsw.gov.au>; Daniel Walker <daniel@mclarentraffic.com.au>

Subject: 7 Montore Road Minto

Hi Adam

Please see attached plan.

Let me know if you need any further information

What is your expected time frame for review of this? It would be great if we can come to a resolution on this quickly.

I have included Daniel on the email so can facilitate any required changes.

Thanks

Anthony

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TODOROSKI
AIR SCIENCES

AIR QUALITY MANAGEMENT PLAN CONCRETE RECYCLERS MINTO

Concrete Recyclers

7 July 2022

Job Number 22031403

Prepared by

Todoroski Air Sciences Pty Ltd

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Air Quality Management Plan

Concrete Recyclers Minto

DOCUMENT CONTROL

Report Version	Date	Prepared by	Reviewed by
DRAFT - 001	23/06/2022	P Henschke	K Trahair
FINAL - 001	07/07/2022	P Henschke	

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1 INTRODUCTION

The Concrete Recyclers Minto facility (the facility) is located at 7 Montore Road, Minto, approximately 4.5 kilometres (km) northeast of Campbelltown and approximately 14km southwest of Liverpool in New South Wales (NSW). The area surrounding the site is predominantly comprised of industrial and commercial operations with the nearest residential dwellings identified to be approximately 0.28km to the west.

Figure 1-1 presents the local setting.

The general operation of the facility involves a resource recovery facility to receive and process up to 450,000 tonnes per annum (tpa) of concrete, brick, asphalt, sandstone and sand from the building and construction industry.

Raw material is delivered via trucks to the site, where it is unloaded and initially screened for contaminants. The material is processed by crushing, screening, washing as required and then stockpiled for the different grades of product. The finished product is then be loaded on to trucks and transported off site.

A site layout indicating key features of the facility is shown in **Figure 1-2**.



Figure 1-1: Local setting



This Air Quality Management Plan (AQMP) has been prepared by Todoroski Air Sciences on behalf of Concrete Recyclers. Todoroski Air Sciences is a specialist air quality and environmental consultancy whose personnel are members of the Clean Air Society of Australia and New Zealand.

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1.2 Purpose and objectives

This AQMP describes how Concrete Recyclers will manage and control air emissions when operating the facility.

The key objective of this AQMP is to ensure that any air quality impacts are minimised and managed in accordance with the site's Development Consent (SSD-5339).

1.3 Structure of this AQMP

This AQMP is structured as follows:

- Section 2: Outlines the applicable statutory requirements.
- Section 3: Provides baseline data.
- Section 4: Outlines the applicable air quality criteria and performance indicators.
- Section 5: Outlines the air quality management and control measures.
- Section 6: Outlines the environmental performance.
- Section 7: Outlines the review and improvement of the environmental performance.
- Section 8: Provides references.

2 STATUTORY REQUIREMENTS

2.1 Development consent

This AQMP has been prepared in accordance with the development consent for SSD-5339.

Table 2-1 presents the consent conditions relative to the air quality management plan.

Table 2-1: Relevant consent conditions

Development Consent (SSD-5339)	AQMP Section
AIR QUALITY	
Dust Minimisation	
B7. The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Section 5
B8. During construction, the Applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Section 5.5
Air Quality Discharges	
B9. The Applicant must fit and operate baghouses on the cement silo and pugmill and a dust extraction system on the processing plant in line with best practices to ensure that the development complies with all load limits, air quality criteria/ air emission limits and air quality monitoring requires as specified in the EPL applicable to the site.	Section 5.2
Site Hardstand	
B10. The Applicant must seal the site with a 5% roller compacted concrete or asphalt in accordance with the air quality modelling provided at Attachment 5 to the Additional Information dated 22 February 2022.	Section 5.2
Air Quality Management Plan	
B11. Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by condition C5. The AQMP must:	This AQMP
(a) be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary;	Section 1.1
(b) detail and rank all emissions from all sources of the development, including particulate emissions;	Section 5.1
(c) detail an ambient air quality monitoring strategy that is capable of evaluating the performance of the development against the air quality criteria in accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales;	Section 6.1.4
(d) identify the control measures that will be implemented for each emission source, including enclosing the crushing equipment and sand washing plant, regularly sweeping the haulage road and watering the stockpiles; and	Section 5.2
(e) nominate the following for each of the proposed controls: i. key performance indicator; ii. monitoring method; iii. location, frequency and duration of monitoring; iv. record keeping; v. complaints register; vi. response procedures; and vii. compliance monitoring.	Section 6
B12. The Applicant must: (a) not commence operation until the AQMP required by condition B11 is approved by the Planning Secretary; and (b) implement the most recent version of the AQMP approved by the Planning Secretary for the duration of the development.	Section 7.1
Post-commissioning Air Verification Report	
B13. At three months, six months and two years following the commencement of operations, or within a timeframe as otherwise agreed with the Planning Secretary, a Post-commissioning Air Verification Report (PAVR) must be prepared to the satisfaction of Planning Secretary. The PAVR	Section 6.3

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Development Consent (SSD-5339)	AQMP Section
must be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary and include: (a) verification against the air quality criteria, undertaken in accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales; (b) an outline of management and mitigation measures to address any exceedances of the criteria; and (c) a description of contingency measures in the event the management and mitigation measures are not effective in reducing air quality impacts to meet the criteria and timing for implementing and validating the effectiveness of these measures.	
Management Plan Requirements	
C1. Management plans required under this consent must be prepared by a suitably qualified and experienced person/s in accordance with relevant guidelines, and include:	This AQMP
(a) details of: i. the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. any relevant limits or performance measures and criteria; and 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;	Section 2 & 4
(b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 5
(c) 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 pursuant to paragraph (c) above;	Section 6 & 7
(d) 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;	Section 5.3
(e) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 7
(f) a protocol for managing and reporting any: i. incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); ii. complaint; iii. failure to comply with statutory requirements; and	Section 5.3, 6.5, 6.6 & 6.7
(g) a protocol for periodic review of the plan.	Section 7
Revision of Strategies, Plans and Programs	
C8. Within three months of: (a) the submission of a Compliance Report under condition C14; (b) the submission of an incident report under condition C10; (c) the submission of an Independent Audit under condition C16; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review, 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.	Section 7
C9. 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. Note: 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.	Section 7
Incident Notification, Reporting and Response	
C10. 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 Appendix 3.	Section 6.6
Non-Compliance Notification	
C11. The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	Section 6.5

Development Consent (SSD-5339)	AQMP Section
C12. 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.	Section 6.5
C13. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Section 6.5
Compliance Reporting	
C14. Within three months after the first year of commencement of operation of the DSRRC, 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 Planning Secretary 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: (a) identify any trends in the monitoring data over the life of the development; (b) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (c) describe what measures will be implemented over the next year to improve the environmental performance of the development	Section 6.4
C15. 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.	Section 6.4
Independent Audit	
C16. Within one year of the commencement of operations of the DSRRC, 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: (a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020) (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 (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).	Section 7.2
C17. In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C16 of this consent; (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; (c) implement the recommendations to the satisfaction of the Planning Secretary; and (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.	Section 7.2
Access to Information	
C19. At least 48 hours before the commencement of construction of the development until the completion of all works under this consent, including remediation, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (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; (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; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaints register, updated monthly; (ix) the Compliance Report of the development; (x) audit reports prepared as part of any Independent Audit of the development and the Applicant's	Section 7.3

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Development Consent (SSD-5339)	AQMP Section
response to the recommendations in any audit report; (xi) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary.	

2.2 Environment Protection Licence

At the time of writing, an application for an Environment Protection Licence (EPL) has not yet been submitted for the Concrete Recyclers Minto facility. This management plan is to be updated in accordance with any relevant requirements of the EPL once received.

2.3 Consultation

Consultation with the NSW EPA regarding the NMP will be sought when the application of the EPL is submitted.

3 BASELINE DATA

This section describes the existing baseline environment including the climate, meteorology and ambient air quality in the area surrounding the site.

3.1 Local climatic conditions

Long-term climatic data from the Bureau of Meteorology (BoM) weather station at Camden Airport Automatic Weather Station (AWS) (Site No. 068192) were analysed to characterise the local climate in the proximity of the site. Camden Airport is located approximately 13.5km west of the facility.

Table 3-1 and **Figure 3-1** present a summary of data from the Camden Airport AWS collected over a 33-to-47-year period for the various meteorological parameters.

The data indicate that January is the hottest month with a mean maximum temperature of 29.7 degrees Celsius (°C) and July is the coldest month with a mean minimum temperature of 3.0°C.

Rainfall decreases during the cooler months, with an annual average rainfall of 796.6 millimetres (mm) over 49.2 days. The data indicate that March is the wettest month with an average rainfall of 105.1mm over 5.1 days and July is the driest month with an average rainfall of 35.4mm over 2.9 days.

Relative humidity levels exhibit variability over the day and seasonal fluctuations. Mean 9am relative humidity ranges from 64% in October to 82% in June. Mean 3pm relative humidity levels range from 43% in August to 53% in June.

Wind speeds exhibit seasonal variations with lower wind speed records for 9am and higher observations for 3pm conditions. Mean 9am wind speeds range from 5.4 kilometres per hour (km/h) in May to 9.3km/h in October. Mean 3pm wind speeds range from 12.5km/h in May to 18.5km/h in December.

Table 3-1: Monthly climate statistics summary – Camden Airport AWS

Parameter	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann.
Temperature													
Mean max. temp. (°C)	29.7	28.6	26.8	23.9	20.7	17.8	17.4	19.1	22.1	24.4	26.4	28.6	23.8
Mean min. temp. (°C)	17.0	16.8	14.9	11.0	7.0	4.6	3.0	3.9	6.8	10.0	13.0	15.3	10.3
Rainfall													
Rainfall (mm)	80.6	103.9	105.1	65.9	53.1	64.9	35.4	41.2	38.1	62.3	76.9	57.5	796.6
No. of rain days (≥1mm)	5.0	5.1	5.1	4.1	3.6	3.6	2.9	2.9	3.2	4.4	4.9	4.4	49.2
9am conditions													
Mean temp. (°C)	21.6	20.9	19.6	16.9	13.0	9.6	8.6	10.7	14.6	17.7	18.7	20.9	16.1
Mean R.H. (%)	72	78	77	77	81	82	81	73	66	64	69	68	74
Mean W.S. (km/h)	6.5	5.5	6.0	6.3	5.4	5.9	5.8	7.9	9.0	9.3	8.0	7.9	7.0
3pm conditions													
Mean temp. (°C)	27.7	26.9	25.4	22.5	19.3	16.5	16.0	17.7	20.3	22.4	24.3	26.8	22.2
Mean R.H. (%)	49	52	52	52	52	53	50	43	44	47	50	46	49
Mean W.S. (km/h)	17.2	15.5	15.0	13.8	12.5	13.9	14.6	16.8	18.1	17.7	17.7	18.5	15.9

Source: **Bureau of Meteorology, 2022**

R.H. – Relative Humidity, W.S. – wind speed

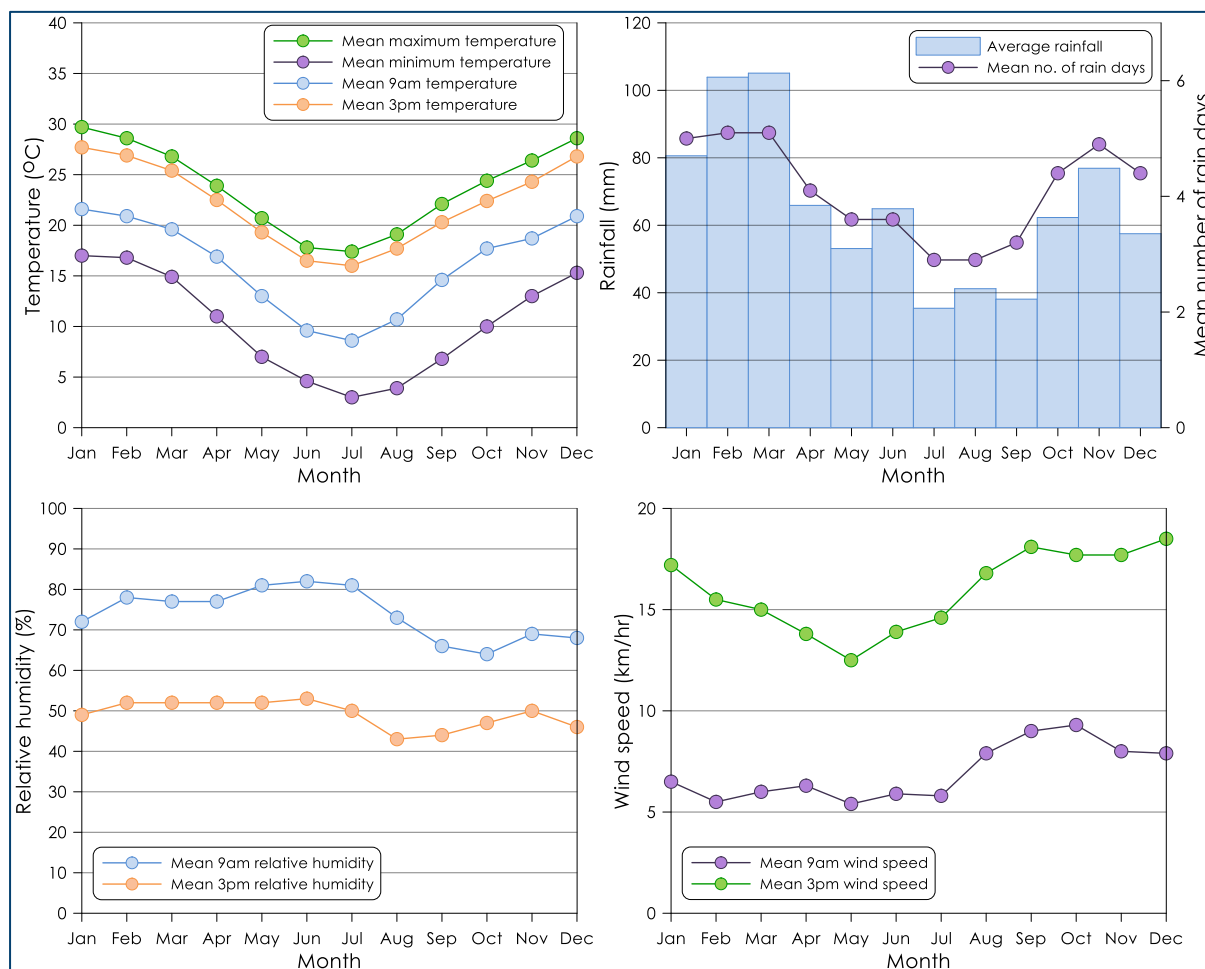


Figure 3-1: Monthly climate statistics summary – Camden Airport AWS

3.2 Local meteorological conditions

Annual and seasonal windroses for the NSW Department of Planning and Environment (DPE) monitor at Campbelltown West during the 2021 calendar period are presented in **Figure 3-2**.

Analysis of the windroses shows that the wind directions are predominately from the southwest. In summer, winds from the east to the southwest are most frequent with fewer winds from the east-northeast. The autumn and winter windroses show a similar distribution pattern as the annual windrose with the greatest winds from the southwest and west-southwest. In spring the windrose shows a similar distribution pattern as the annual windrose with winds greatest from the southwest quadrant.

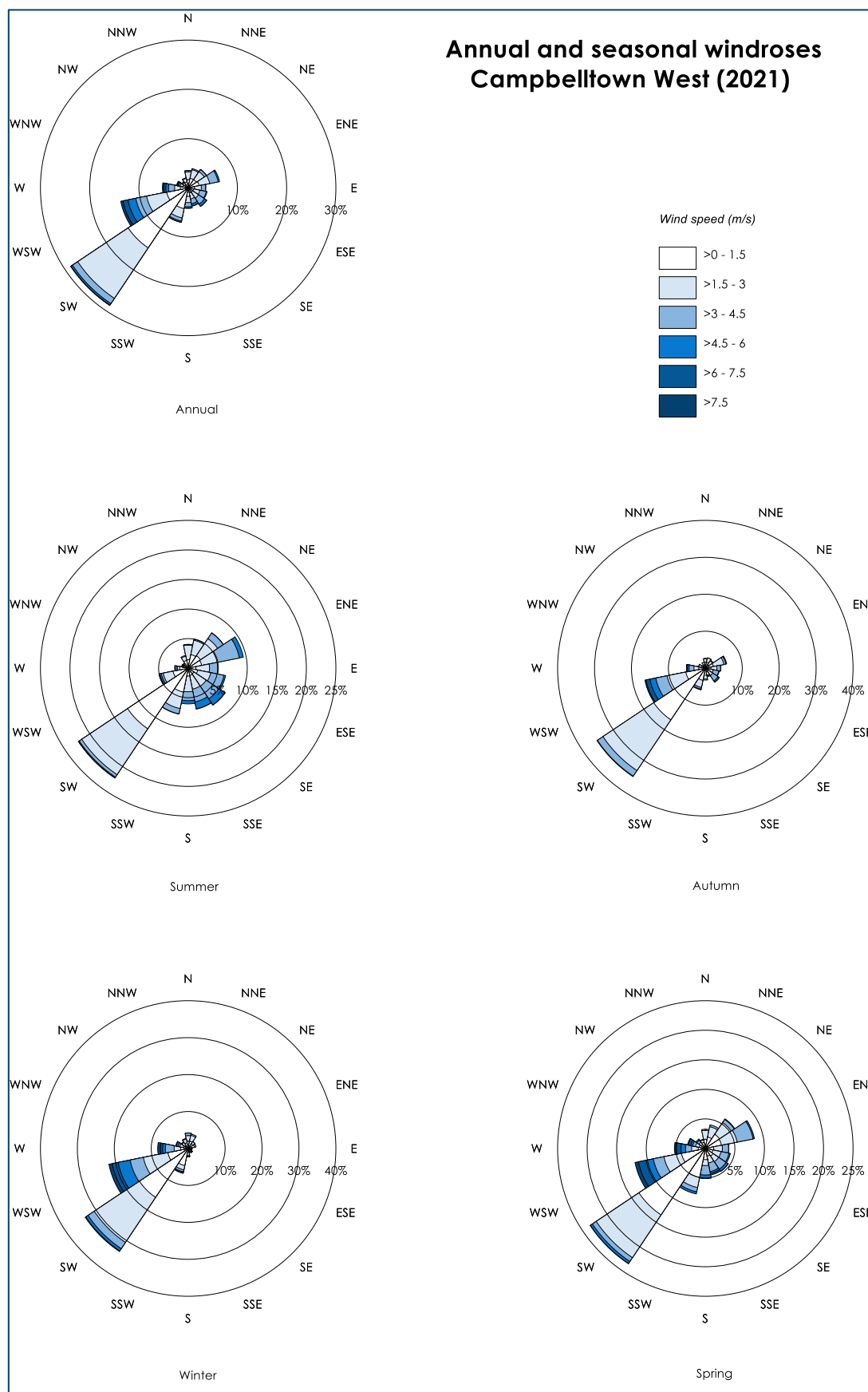


Figure 3-2 : Annual and seasonal windroses – Campbelltown West (2021)

3.3 Local air quality monitoring

The main sources of air pollutants in the area surrounding the facility are emissions from surrounding industrial and commercial operations and from other anthropogenic activities such as wood heaters and motor vehicle exhaust.

Data from the nearest air quality monitor operated by the NSW DPE at Campbelltown West is used to characterise the baseline background pollutant levels in the vicinity of the site. The Campbelltown West monitor is located approximately 5km southwest of the facility.

3.3.1 PM₁₀ monitoring

A summary of the available PM₁₀ monitoring data from 2015 to 2021 is presented in **Table 3-2**. Recorded 24-hour average PM₁₀ concentrations are presented in **Figure 3-3**.

The data indicate that annual average PM₁₀ levels were generally below the National Environmental Protection (Ambient Air Quality) Measure (NEPM) standard of 25µg/m³ whereas the 24-hour average NEPM standard of 50µg/m³ was exceeded on occasion. It is noted that the elevated PM₁₀ concentrations recorded in late 2019 and early 2020 are attributed to the widespread bushfires and drought affecting NSW.

Table 3-2: Summary of PM₁₀ levels from Campbelltown West (µg/m³)

Year	Annual average	NEPM standard
2015	15.6	25
2016	16.1	25
2017	15.7	25
2018	17.9	25
2019	22.3	25
2020	17.0	25
2021	13.8	25
Year	Maximum 24-hour average	NEPM standard
2015	69.7	50
2016	50.1	50
2017	53.1	50
2018	72.3	50
2019	132.0	50
2020	249.7	50
2021	111.9	50

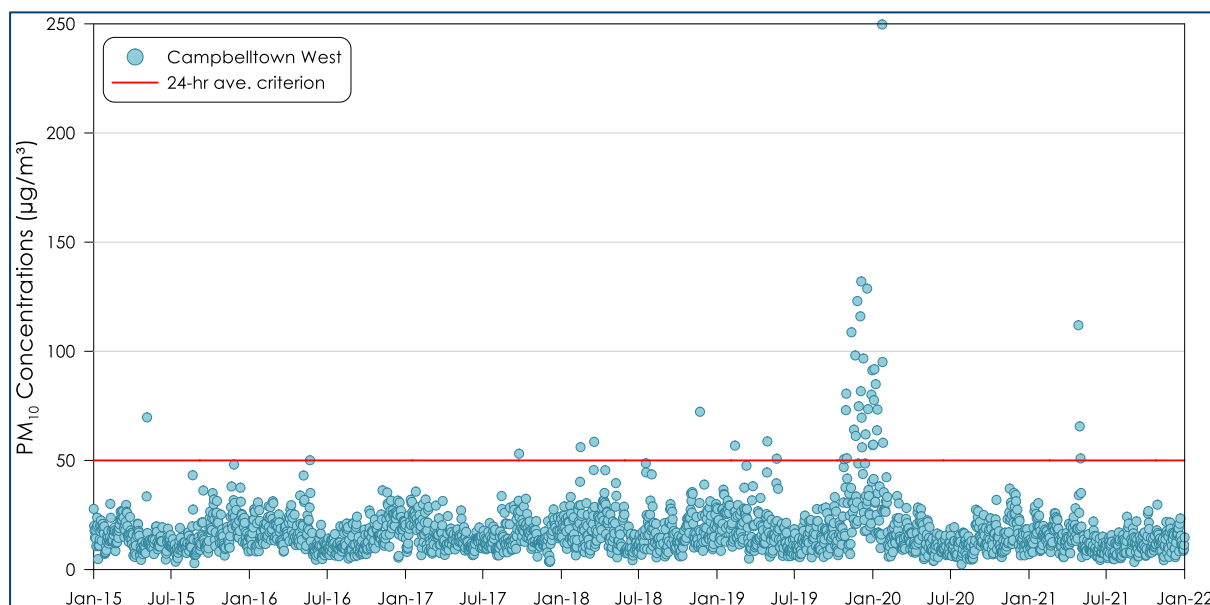


Figure 3-3: 24-hour average PM₁₀ concentrations

3.3.2 PM_{2.5} monitoring

A summary of the available data is presented in **Table 3-3**. Recorded 24-hour average PM_{2.5} concentrations are presented in **Figure 3-4**.

The data indicate that annual average PM_{2.5} levels were generally above the National Environmental Protection (Ambient Air Quality) Measure (NEPM) standard of 8µg/m³. The 24-hour average NEPM standard of 25µg/m³ was exceeded on occasion. It is noted that the elevated PM₁₀ concentrations recorded in late 2019 and early 2020 are attributed to widespread bushfires and drought affecting NSW.

Table 3-3: Summary of PM_{2.5} levels from Campbelltown West (µg/m³)

Year	Annual average	NEPM standard
2015	7.9	8
2016	7.9	8
2017	7.4	8
2018	8.4	8
2019	11.8	8
2020	7.5	8
2021	6.3	8
Year	Maximum 24-hour average	NEPM standard
2015	15.7	25
2016	35.8	25
2017	25.0	25
2018	45.4	25
2019	106.0	25
2020	69.0	25
2021	99.9	25

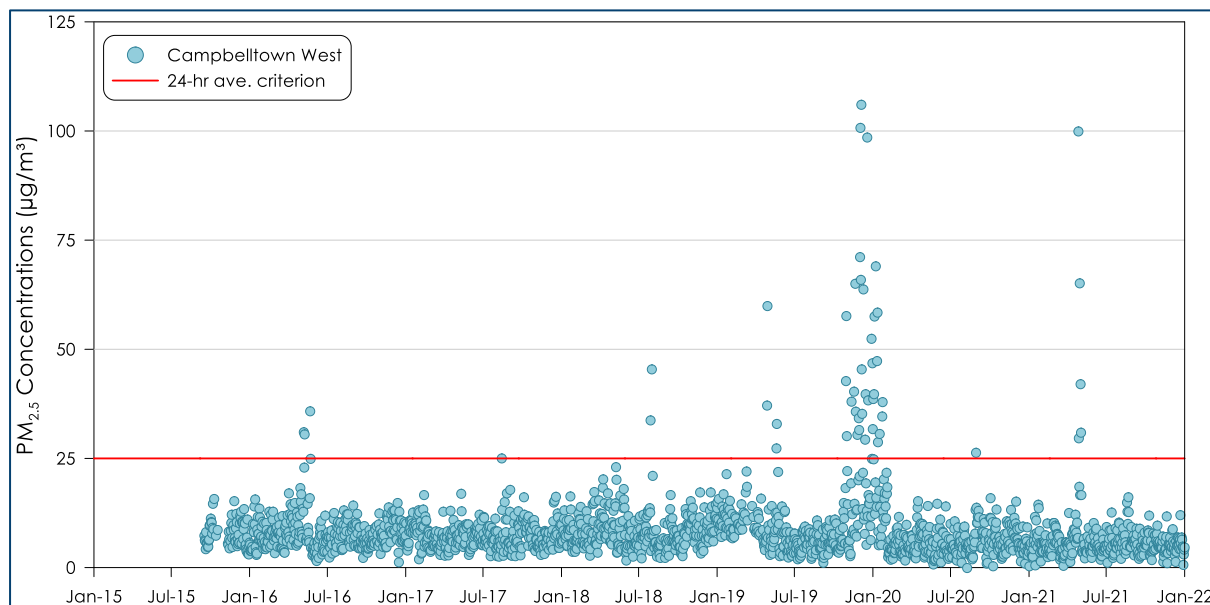


Figure 3-4: 24-hour average PM_{2.5} concentrations

4 AIR QUALITY CRITERIA AND PERFORMANCE INDICATORS

There are no load limits, air quality criteria or air emission limits specified for the facility in the development consent conditions.

4.1 POEO standards

Table 4-1 presents the applicable standards of concentration for scheduled activity – general activities and plant as per the Protection of the Environment Operations (Clean Air) Regulation 2021 (POEO) for the baghouses which service the crusher building and the pugmill at the facility.

Table 4-1: Applicable POEO standards of concentration

Pollutant	Standard of concentration for scheduled activity – Group 6
Solid particles	50 mg/m ³

4.2 Performance indicators

Table 4-2 presents the air quality related key performance indicators that will be used to assess the air quality performance of the facility.

Table 4-2: Key performance indicators

Measure	Key performance indicator
Training	All site personnel have completed air quality training
Implementation of the management practices	Annual compliance checklist shows that all management practices listed in this plan were implemented
Visual monitoring	No excessive dust visible beyond boundary
Validated air quality complaints are minimised and appropriate management actions are implemented following receipt of a complaint	No validated air quality complaints
Stack emission testing	Solid particle concentrations do not exceed the applicable 50 mg/m ³ POEO standard

5 AIR QUALITY MANAGEMENT AND CONTROL MEASURES

The activities at the site will generate some amount of dust, therefore it is prudent to take reasonable and practicable measures to prevent and minimise excessive generation of emissions which may affect the surrounding environment.

The effectiveness of air quality management and control measures will be assessed and continually improved through the plan review (**Section 7.1**).

5.1 Air pollutant sources

The most significant pollutant generated from the facility is dust.

Table 5-1 ranks the annual particulate emissions for the various activities associated with the facility. Estimates of air pollutant emissions associated with the facility have been obtained from the AQIA (**Wilkinson Murray, 2021**). The controls assumed in the dust estimation are detailed in Section 7 of the AQIA.

Table 5-1: Summary of estimated dust emissions for the facility (kg/year)

Activity	PM ₁₀
Hauling (roller compacted cement stabilised road base)	1,275
Hauling (paved)	483
Loading/ unloading	449
Wind erosion	216
Crushing/ screening	113

5.2 Control measures and management practices

The primary dust mitigation measures that are applied at the facility in line with best practice are outlined in **Table 5-2**. These measures are applied to the on-site activities to minimise the generation and hence potential for dust impacts at the nearest sensitive receptor and in the surrounding environment. All reasonable and feasible steps are undertaken to ensure that the site does not cause emissions of offensive odour beyond the boundary of the site.

The air quality management tools include a comprehensive set of both proactive and reactive control measures and management practices.

The site is to keep an annual compliance checklist of control measures and management practices to confirm they are being implemented.

Table 5-2: Operational air quality control measures and management practices

Activity	Control measures and management practice
General	Training is provided to all site personnel on appropriate air quality control practices and the requirements per this plan.
	The weather forecast is checked daily, and appropriate management measures are implemented prior to adverse weather conditions to minimise particulate emissions from the site.
	If adverse weather conditions occur during operations, activities are assessed and modified as required. Cease activity where reasonable levels of dust cannot be maintained using available means.
	Visual monitoring of activities is undertaken to identify dust generation.
	Procedures developed for staff to report the presence of strong odours around the perimeter of the site.

Activity	Control measures and management practice
	Spotters should ensure that all loads that are deemed to contain odorous waste are rejected from the site.
	The site maintains an Environmental Complaints Register, which includes an odour complaint logbook.
	In the event of an odour complaint, an immediate investigation of any odour sources is undertaken, together with appropriate actions to eliminate any identified excessive odour.
	Site is to be sealed with a 5% roller compacted concrete or asphalt.
Plant, equipment and vehicles	Engines of on-site vehicles and plant are switched off when not in use.
	Vehicles and plant are fitted with pollution reduction devices where practicable.
	Vehicles are maintained and serviced according to manufacturer's specifications.
Material handling	Drop heights from loading and handling equipment are reduced where practical.
	Excessively dusty materials are dampened during handling.
Exposed areas/stockpiles	The extent of exposed surfaces and stockpiles is kept to a minimum.
	Exposed areas and stockpiles are dampened with water as far as is practicable if dust emissions are visible, or there is potential for dust emissions outside operating hours.
	Fixed water sprays/ sprinklers installed to provide watering of stockpiles.
	Hebel/ concrete boundary fence to be constructed around the site at a height of 6 metres which acts as a wind break to reduce wind speeds on-site.
Hauling/ vehicle movements	On-site speed limits of 10 kilometres per hour are enforced.
	Vehicle traffic is restricted to designated routes.
	Driveways and hardstand areas are swept/cleaned regularly as required.
	Wheel wash/ wheel cleaning for vehicles leaving the site.
	Spills onto trafficked areas are cleaned as soon as possible.
	Delivery schedules are coordinated to avoid a queue of the incoming or outgoing trucks for extended periods of time.
	Vehicle loads are covered when travelling off-site.
	Haul roads are watered using water carts such that the road surface has sufficient moisture to minimise on-road dust generation but not so much as to cause mud/dirt track out to occur.
Material processing	Crushers and sand washing plant screen to be in purpose-built enclosures.
	Water sprays used to wet material as far as practicable if dust emissions are visible.
	Vacuum dust extraction used at six points; jaw crusher, conveyor 1, screen undersize conveyor discharge, screen discharge oversize conveyor, pre cone crusher and post cone crusher, to remove nuisance dust and passed through baghouse prior to discharge.
	Baghouse filter systems installed on pug mill and cement silo.
	Ensure all baghouse filter systems are maintained to operate as per manufacturers specifications.
	Dust extraction system installed on the processing plant

5.3 Contingency plan

In the event that a performance indicator (refer to **Section 4.2**) has not been met, Concrete Recyclers will implement the following contingency plan to manage any unpredicted impacts and their consequences to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible:

- ✦ Report the non-compliance or incident if required per Sections 6.5 and 6.6 respectively;
- ✦ Investigate and identify the cause of the non-compliance or incident;
- ✦ Consider options to manage the identified impacts; and

- ✦ Implement the appropriate course of action to ensure that the exceedance/incident ceases and does not reoccur to the satisfaction of the Planning Secretary.

5.4 Training

All employees and contractors working on-site will undergo training relating to air quality management issues. The training will address elements related to air quality management including:

- ✦ General environmental awareness;
- ✦ The requirements of this AQMP;
- ✦ Relevant legislation;
- ✦ Roles and responsibilities for air quality management;
- ✦ Air quality mitigation and management measures; and,
- ✦ Procedure to be implemented in the event of an incident (e.g. release of excessive dust emissions from site).

5.5 Control measures and management practices for construction activity

Table 5-3 presents the construction air quality control measures and management practices implemented for the facility.

Table 5-3: Construction air quality control measures and management practices

Activity	Control measures and management practice
General	If adverse weather conditions occur during construction, activities are assessed and modified as required. Cease activity where reasonable levels of dust cannot be maintained using available means.
Plant, equipment and vehicles	Engines of on-site vehicles and plant are switched off when not in use.
Material handling	Drop heights from loading and handling equipment are reduced where practical.
Exposed areas/stockpiles	The extent of exposed surfaces and stockpiles is kept to a minimum.
	Exposed areas and stockpiles are dampened with water as far as is practicable if dust emissions are visible.
	Where possible apply barriers, covering or temporary rehabilitation.
	Rehabilitate completed sections as soon as practicable.
Hauling/ vehicle movements	On-site speed limits are enforced.
	Vehicle traffic is restricted to designated routes.
	Driveways and hardstand areas are swept/cleaned regularly as required to prevent any tracking of fine debris.
	Vehicle loads are covered when travelling off-site.

6 ENVIRONMENTAL PERFORMANCE

6.1 Pollutant monitoring

Per the AQIA, as modelling predictions for the site do not indicate any exceedance of the relevant impact assessment criteria at the residential receptors, there is no specific ambient air quality monitoring recommendation for the site at the residential receptors.

6.1.1 Stack testing

Verification stack testing is to be conducted for the baghouse exhausts to ensure they achieve the applicable POEO standard for solid particles in **Table 4-1**.

Discharge parameters to be measured include diameter, volumetric flow rate, velocity, temperature, and particulates concentration. Velocity, volumetric flow rate and temperature are to be measured in accordance with Test Method 2 and particulates are to be measured in accordance with Test Method 15 of the NSW EPA *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales* (2022).

The monitoring duration for each parameter is as specified by the relevant testing method/standard.

6.1.2 Air quality inspections

Monitoring for dust will involve regular inspections of sensitive areas and activities. Routine inspections will be conducted as per the frequency and performance indicator as stated in **Table 6-1**.

Table 6-1: Air quality inspections

Inspection	Frequency	Performance indicator
Visual surveillance for dust emission or mud tracking off-site.	Daily	No dust emission or mud tracking off-site.
Inspection of dust controls to ensure implemented and working effectively.	Daily	All dust controls implemented as required and working effectively.
Site inspections for visible dust emissions and dust deposits on surfaces.	Daily	Visible dust emissions and deposits on surfaces indicate effective dust suppression.
Plant/ equipment inspections including maintenance and emissions.	As required, prior to use	Inspections undertaken in line with requirements.

6.1.3 Visual dust monitoring

Visual dust monitoring is to be undertaken continually during operation. **Table 6-2** presents the visual dust trigger action response plan (TARP). If a visible dust plume generated by the site is observed with the potential to cross or having already crossed the facility boundary, an immediate investigation of any dust sources must be undertaken together with appropriate actions to eliminate any identified excessive dust.

Table 6-2: Visual dust TARP

Alert level	Trigger	Action
Green	No visible dust leaving the site	Continue visual monitoring
Amber	Visible dust plume observed with potential to cross facility boundary	Review and investigate activities and respective control measures. Where appropriate, implement additional remedial measures.

Alert level	Trigger	Action
Red	Visible dust plume observed crossing the facility boundary	Undertaken an investigation of dust generating activities and if necessary, modify or cease dust generating activities.

A site visual dust log is to be kept by Concrete Recyclers recording any observation of excessive dust generated by the facility. Records are to include the following details where relevant:

- ✦ the date, time, duration and location of the observation;
- ✦ meteorological conditions at the time of observation (obtained from the nearest BoM or DPE weather station);
- ✦ whether the visual dust plume travelled off-site;
- ✦ any source/s of dust specifically identified as contributing to the visual dust plume; and
- ✦ the action taken by Concrete Recyclers to minimise dust levels and prevent the issue from recurring.

6.1.4 Ambient air quality monitoring strategy

The ambient air quality monitoring strategy to evaluate the performance of the development against the air quality criteria consists of establishing a real-time air quality monitor at the site.

The real-time air quality monitor will be operated that can be used to continuously measure concentrations of particulates including PM₁₀. The real-time air quality monitor will be portable and can be used for monitoring operational trends, such as dust contribution downwind of the activities occurring onsite dependant on the prevailing weather conditions. The measured PM₁₀ levels can be used to inform against the other dust metrics.

An indicative ambient air quality monitoring location is shown in **Figure 6-1**. The monitoring location will need to be ground-truth to ensure they are compliant with siting requirements and may be moved from time-to-time depending on site constraints.

Monitoring data will be reviewed annually and compared against the air quality criteria and predicted levels for the development presented in the air quality assessment.



Figure 6-1: Indicative ambient air quality monitoring location

6.2 Performance evaluation

The performance of the facility is to be evaluated to be against the key performance indicators outlined in **Table 4-2**. **Table 6-3** indicates the evaluation schedule for each key performance indicator.

Where performance indicators are not being met, the contingency plan per **Section 5.3** is to be implemented.

Table 6-3: Key performance indicators

Key performance indicator	Performance evaluation schedule
All site personnel have completed air quality training	Monthly
Annual compliance checklist shows that all management practices listed in this plan were implemented	Annual
No excessive dust visible beyond boundary	Continuous
No validated air quality complaints	As required
Solid particle concentrations do not exceed the applicable 50 mg/m ³ POEO standard	Annual

6.3 Post commissioning air verification report

At three months, six months and two years following the commencement of operations, or within a timeframe as otherwise agreed with the Planning Secretary, a Post-commissioning Air Verification Report (PAVR) must be prepared to the satisfaction of Planning Secretary. The PAVR must be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary and include:

- a) verification against the air quality criteria, undertaken in accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales
- b) an outline of management and mitigation measures to address any exceedances of the criteria; and
- c) a description of contingency measures in the event the management and mitigation measures are not effective in reducing air quality impacts to meet the criteria and timing for implementing and validating the effectiveness of these measures.

6.4 Compliance reporting

Within three months after the first year of commencement of operation of the facility, 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 Planning Secretary 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:

- ✦ 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 Applicant must make each Compliance Report publicly available no later than 60 days after submitting.

6.5 Non-compliance

The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.

A non-compliance notification is to 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.

A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

6.6 Incident reporting

The Planning Secretary is to 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 Appendix 3 Incident Notification and Reporting Requirements of SSD-5339.

6.7 Complaints protocol

Air quality complaints received by the facility will be recorded in a Complaints Register which will include the following details where available:

- ✦ the date and time of the complaint;
- ✦ the method by which the complaint was made;
- ✦ any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
- ✦ the nature of the complaint;
- ✦ the action taken by Concrete Recyclers in relation to the complaint, including any follow-up contact with the complainant; and
- ✦ if no action was taken by the Concrete Recyclers, the reasons why no action was taken.

The record of a complaint must be kept for at least 4 years after the complaint was made.

7 REVIEW AND IMPROVEMENT OF ENVIRONMENTAL PERFORMANCE

7.1 Review and continuous improvement

A performance review of this AQMP is to be conducted within three months of:

- ✦ the submission of a Compliance Report;
- ✦ the submission of an incident report;
- ✦ the submission of an Independent Audit;
- ✦ the approval of any modification of the conditions of this consent; or
- ✦ the issue of a direction of the Planning Secretary which requires a review,

If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, this plan will 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.

This review includes:

- ✦ A description of any changes to site operations with potential for air quality impacts;
- ✦ A review of air quality monitoring data trends;
- ✦ A review of incidents and non-compliances;
- ✦ A review of air quality complaint records for the year;
- ✦ A description of measures to be implemented to improve the air quality performance of the facility.

The most recent approved version of this AQMP as approved by the Planning Secretary is to be implemented and be made publicly available on the Concrete Recyclers website.

7.2 Independent audits

Within one year of the commencement of operations of the facility, 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:

- ✦ be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020)
- ✦ be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and
- ✦ 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).

The Applicant must:

-
- ✦ review and respond to each Independent Audit Report prepared under condition C16 of the consent;
 - ✦ 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;
 - ✦ implement the recommendations to the satisfaction of the Planning Secretary; and
 - ✦ 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.

7.3 Access to information

At least 48 hours before the commencement of construction of the development until the completion of all works under this consent, including remediation, the Applicant must:

- a) make the following information and documents (as they are obtained or approved) publicly available on the Concrete Recyclers website:
 - i. the documents referred to in condition A2 of this consent;
 - ii. all current statutory approvals for the development;
 - iii. all approved strategies, plans and programs required under the conditions of this consent;
 - 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;
 - 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;
 - vi. a summary of the current stage and progress of the development;
 - vii. contact details to enquire about the development or to make a complaint;
 - viii. a complaints register, updated monthly;
 - ix. the Compliance Report of the development;
 - x. audit reports prepared as part of any Independent Audit of the development and the Applicant's
 - xi. response to the recommendations in any audit report;
 - xii. (xi) any other matter required by the Planning Secretary; and
- b) keep such information up to date, to the satisfaction of the Planning Secretary.

8 REFERENCES

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Flood Emergency Response Plan

Concrete Recyclers
7 Montore Road, Minto, NSW

August 2024

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Cover image: Satellite image of the site and its surrounds. Image credit: Nearmap.

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Acknowledgement of Country

4Pillars acknowledges the Traditional Owners of the land on which this site is located, the people of the Dharawal Nation. We acknowledge their continuing connection to land and sea Country and we pay our respects to their Elders past, present and emerging.

Declaration and limitations of this document

To the best of our knowledge and based on information provided to us by the client or their representatives, the information contained in this report is accurate at the date of issue. 4Pillars has used a degree of care and skill ordinarily exercised in similar assessments by reputable members of the environmental sector in Australia. No other warranty, expressed or implied, is made or intended. The opinions and judgements expressed in this report should not be construed as legal opinions or advice. 4Pillars is also not responsible or liable for any third-Party use or reliance on this report.

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Revision History				
Revision	Date	Details/Comments	Review team	Authorisation
1.0	11/7/2022	Draft FERP document for CEMP.	K. Porter J. Hammond	Concrete Recyclers (Group) Pty Ltd
1.1	15/7/2022	Final FERP document for CEMP.	K. Porter J. Hammond	Concrete Recyclers (Group) Pty Ltd
2.0	1/8/2022	RFI amendments.	K. Porter J. Hammond	Concrete Recyclers (Group) Pty Ltd
2.1	27/8/2024	Revising Site layout to current plans	K. Porter J. Hammond	Concrete Recyclers (Group) Pty Ltd

1 Introduction

4Pillars was engaged by Concrete Recyclers (Group) Pty Ltd to prepare a Flood Emergency Response Plan (FERP) as part of the Construction Environmental Management Plan (CEMP) and Operational Management Plan (OEMP) for a proposed Resource Recovery Facility at 7 Montore Road, Minto (the Site). The preparation of a FERP is a requirement of condition B18 of the Development Consent for the Site.

1.1 Site details

The Site details are summarised in Table 1 below. Please refer to Figure 1 for a map of the Site locality.

Item	Details
Local Government Area	Campbelltown City Council
Address	7 Montore Road, Minto, NSW
Lot(s)	Lot 52 DP 618900
Zoning	IN1 – General Industrial (Campbelltown LEP 2015)
Site size (total)	23,500 m ² (2.35 ha)
Previous land use	Various commercial and industrial activities including waste and equipment storage. Currently used for equipment storage by both Concrete Recyclers and Coates Hire.
Intended future land use	Resource Recovery Facility
Surrounding land uses	IN1 – General Industrial (Campbelltown LEP 2015) SP2 – Drainage (Campbelltown LEP 2015)
Elevation	Approximately 43 m AHD above sea level
Hydrology	The Site is located on the south bank of Bow Bowing Creek, within the Bow Bowing Bunbury Curran Creek catchment.

Table 1: Summary of Site details.

2 Objectives

2.1 Legislative requirements and definitions

Campbelltown City Council (the Council) have identified the Site as a Flood Control Lot. The *State Environment Planning Policy (Exempt and Complying Development Codes) 2008* (Section 1.5) defines Flood Control Lots as:

“a lot to which flood related development controls apply in respect of development for the purposes of industrial buildings, commercial premises, dwelling houses, dual occupancies, multi dwelling housing or residential flat buildings (other than development for the purposes of group homes or seniors housing).”

As part of the Development Consent issued by Campbelltown City Council the following condition must be satisfied:

B18. Prior to the commencement of construction, the Applicant must prepare a Flood Emergency Response Plan to the satisfaction of the Planning Secretary. The Plan must form part of the CEMP and OEMP required by Conditions C2 and C5 and must:

- a. be prepared by a suitably qualified and experienced person(s);
- b. address the provisions of the Floodplain Risk Management Guideline (OEH, 2007);
- c. include details of:
 - i. the flood emergency responses for both construction and operation phases of the development;
 - ii. predicted flood levels;
 - iii. flood warning time and flood notification;
 - iv. assembly points and evacuation routes;
 - v. evacuation and refuge protocols; and
 - vi. awareness training for employees and contractors.

2.2 Application

4Pillars have developed this FERP to demonstrate the emergency response to flooding for both the construction phase and the operation phase of the development. This FERP has been developed based on the information included in the Preliminary Flood Assessment conducted by Martens & Associates Pty Ltd for the Site as well as Campbelltown City Council's flood mapping.

This FERP has also been developed in accordance with relevant State legislation and best-practice guidelines, to satisfy requirements and conditions outlined in the Determination Notice, including:

- Floodplain Risk Management Guideline (OEH, 2007);
- Flood emergency response planning classification of communities (OEH, 2007);
- SES requirements from the floodplain risk management process (OEH, 2007);
- Campbelltown (Sustainable City) Development Control Plan 2015; and
- Bow Bowing Bunbury Curran Creek Strategic Floodplain Risk Management Study and Plan (Molino Stewart 2019).

The table below summarises where this FERP document addresses each aspect of condition B18 of the Development Consent:

Condition point	Where addressed in this FERP
B18. Prior to the commencement of construction, the Applicant must prepare a Flood Emergency Response Plan to the satisfaction of the Planning Secretary. The Plan must form part of the CEMP and OEMP required by Conditions C2 and C5 and must:	
a. be prepared by a suitably qualified and experienced person(s);	This FERP has been prepared by a suitably qualified and experienced environmental consultant.
b. address the provisions of the Floodplain Risk Management Guideline (OEH, 2007);	This FERP has been developed in reference to the Floodplain Risk Management Guideline (OEH, 2007).
c. include details of:	
i. the flood emergency responses for both construction and operation phases of the development;	Refer to Section 4.2.
ii. predicted flood levels;	Refer to Section 3 and Figure 4.
iii. flood warning time and flood notification;	Refer to Sections 3 and 4.2.
iv. assembly points and evacuation routes;	Refer to Sections 4.3 and 4.4, and Figure 5.
v. evacuation and refuge protocols; and	Refer to Sections 4.3 and 4.4.
vi. awareness training for employees and contractors.	Refer to Section 4.1.

This FERP will be revised after the commencement of the construction phase and prior to the operational phase of the development to ensure the emergency responses detailed within this plan continue to be effective. Implementing this FERP will ensure flood response is effective and the impacts of flooding are minimised.

3 Flood Risk Summary

The Probable Maximum Flood (PMF) is the largest flood extent that can occur in an area. The 1% Annual Exceedance Probability (AEP) is the flood extent with a 1% chance per year of being exceeded. According to the Bow Bowing Bunbury Curran Creek Strategic Floodplain Risk Management Study and Plan (refer to Figure 4), the entirety of the Site is mapped

within the PMF and areas of 0.1% - 20% AEP are mapped along the perimeters of the Site. For the purposes of this FERP, the entirety of the Site is assumed to be impacted by PMF, however smaller flood extents may only impact portions of the Site.

Martens & Associates Pty Ltd conducted a Preliminary Flood Assessment (PFA) for the Site in March 2020. The assessment included hydraulic modelling that predicted the flood risk for the Site. A TUFLOW hydraulic model was used to assess flooding for the 1% AEP flood event both before and after development works. The assessment made the following observations and conclusions:

- The majority of the Site (prior to development) to be elevated above the 1% AEP extent (1% AEP flood levels were modelled to be between 42.50 m AHD – 43.12 m AHD);
- The critical storm duration was determined to be 2 hours for the 1% AEP;
- The earthworks associated with the development will elevate the Site levels to at least 500 mm above the 1% AEP extent to comply with the Campbelltown (Sustainable City) Development Control Plan 2015 and further reducing the potential impacts of flooding on the Site; and
- The modelling found the 1% AEP hydraulic hazard at the Site entrance to be low hazard.

The critical storm duration for the Site was determined to be 2 hours for the 1% AEP. This means a 1% AEP flood extent is expected to be reached after 2 hours of consistently storm-heavy rainfall. It should be noted that rainfall intensity is variable, so the critical storm duration should be used as a guide only for flood warning time.

This FERP has been developed based on the information included in both the Preliminary Flood Assessment and Campbelltown City Council's flood mapping.

4 Emergency Flood Response

4.1 Preparatory measures

The following section presents a brief outline of key preparatory measures and responsibilities associated with the implementation of the FERP at the site. The table below summarises the preparatory measures to be taken to ensure a prompt emergency response and minimise the impacts of flooding.

Measure	Responsibility	Schedule
Weather monitoring through Bureau of Meteorology (BoM). Both daily forecast and weather warnings.	Site Supervisor or delegate	Daily
Monitor signs of flooding on and around the Site	Site Supervisor or delegate	Continual
Flood risk training	All Site staff	Prior to construction commencing, and yearly ongoing.

Table 2. Preparatory measures to be taken throughout the construction and operation of the Site.

Overall site management and compliance, as well as the activation, training and reviewing the FERP is the responsibility of the Site Supervisor or their delegate, with assistance from advisory managers, employees, and regular contractors. The Site Supervisor or their delegate will ensure that all employees read and understand the FERP. The Site Supervisor or their delegate will also ensure all relevant persons are re-trained if the FERP is altered in a substantial way.

4.2 Response procedure

Trigger	Response	Responsibility
Storms forecast on BoM	Alert. All site staff are to be alerted of the forecast and the weather should continue to be monitored.	It is the responsibility of the Site Supervisor to action responses to these triggers, and the responsibility of all personnel on Site to inform the Site Supervisor if triggers have been identified.
Severe weather or thunderstorm warning for the area	Increased alert level. All site staff are to be alerted to the weather warning. All vehicles, mobile plant, equipment and hazardous substances are to be moved to higher ground.	
Increased rainfall on Site	Prepare for activation of FERP. All site staff are to be prepared for activation of the FERP. All vehicles, mobile plant, equipment and hazardous substances are to be moved to higher ground.	
Visible signs of flooding around the Site (i.e. rising water levels)	Activation of the FERP. All site staff notified of activation of the FERP. An evacuation warning will be issued to all site staff.	

4.3 Evacuation procedure

Once the FERP had been activated, the following steps must be followed:

1. The Site Supervisor will issue an evacuation warning over the radio to all personnel on Site.
2. The Site Supervisor will issue an evacuation order over the radio to all personnel on Site.
3. All personnel will follow the clearest possible route to the emergency flood assembly point identified in Figure 5. All Site visitors are to follow the directions for Site personnel.
4. Once assembled, the Site Supervisor will ensure all personnel are accounted for. Any Site staff not accounted for will be contacted via phone. Any Site visitors not accounted for will be contacted via phone numbers recorded on the Site sign-in register.
5. Emergency Services will be contacted as necessary.

4.4 Evacuation route

The recommended evacuation route is shown in Figure 5. However, Site conditions may require an alternative route to be followed. If the recommended evacuation route is blocked, site staff should take the clearest direct route to the emergency flood assembly point. The emergency flood assembly point has been determined based on existing flooding information and modelling for the Site. If the emergency flood assembly point is inaccessible during an evacuation, the Site Supervisor should identify an alternative assembly point outside of the flood extent. The FERP will be updated to reflect actual Site conditions where necessary.

4.5 Post-flood

Employees involved in a flood evacuation are not permitted to leave the emergency flood assembly point unless approved to do so by management, or a representative of the Emergency Services (if in attendance). Once it is safe to return to Site, the following will be assessed:

- Remaining hazards;
- Damage to any structures, plant or equipment; and
- Pollution, erosion and other environmental impacts.

Emergency services will be contacted for any remaining hazards where necessary. Any damage will be repaired before construction/operational works resume. If environmental impacts are identified as a result of the flood, the Site Supervisor should notify the Project Manager and contact regulatory authorities (i.e. the EPA) and stakeholders where necessary. Contact details for relevant authorities are included in the table below.

Contact	Description	Contact information
Concrete Recyclers Project Manager (Anthony Males)	Contact on FERP activation	0427 308 437
NSW Environment Protection Authority (EPA)	Main environmental regulator for sites with an EPL	131 555
Campbelltown City Council	Local government environmental regulator	(02) 4645 4000
NSW Ministry of Health	Public health authority	(02) 9391 9000
SafeWork NSW	WHS authority	13 10 50
Fire and Rescue NSW	Emergency services – flood hazards	1300 729 579 (or 000)

5 FERP review

We note that the proposed development has not commenced at the time this FERP has been prepared and will be reviewed once the development is complete. It will also be reviewed following an activation, to ensure response actions remain effective. A basic review of the FERP will involve the Site Supervisor, or relevant delegate conducting a review of all information in the plan, paying particular attention to the following elements:

- i. Flood mapping;
- ii. Site elevation and topography;
- iii. Site layout; and
- iv. Evacuation routes.

The document is to be revised and re-issued following the review. The Site Supervisor or their delegate must ensure that all relevant persons are re-trained in the FERP following the review.

Site locality

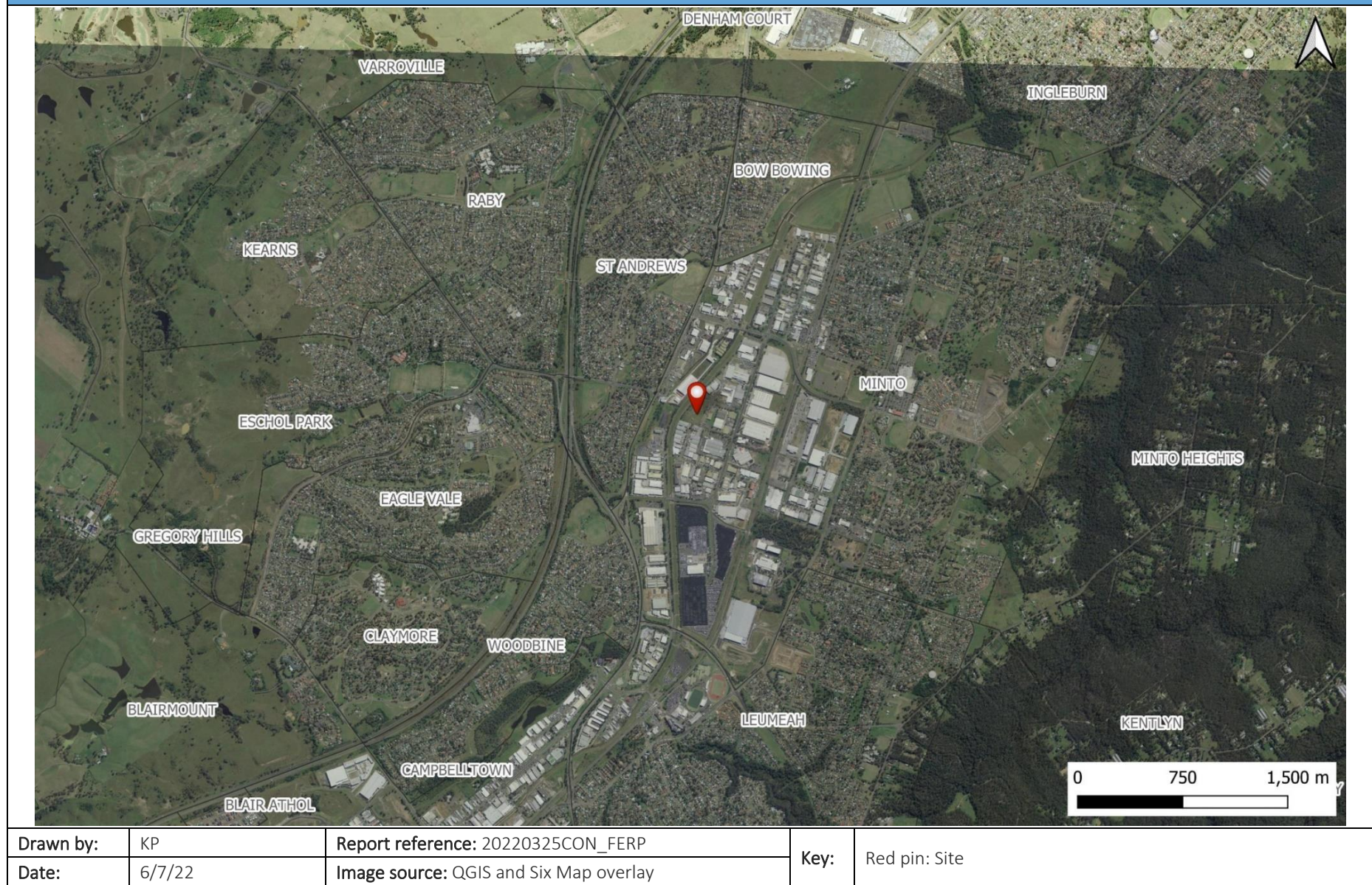


Figure 1: Site locality.

Aerial view of the Site (pre-development)



Drawn by:	KP	Report reference:	20220523CON_FERP	Key:	Refer to map legend.
Date:	6/7/22	Image source:	QGIS with Nearmap overlay (dated 15/6/22)		

Figure 2: Site aerial view.

Site layout (proposed)

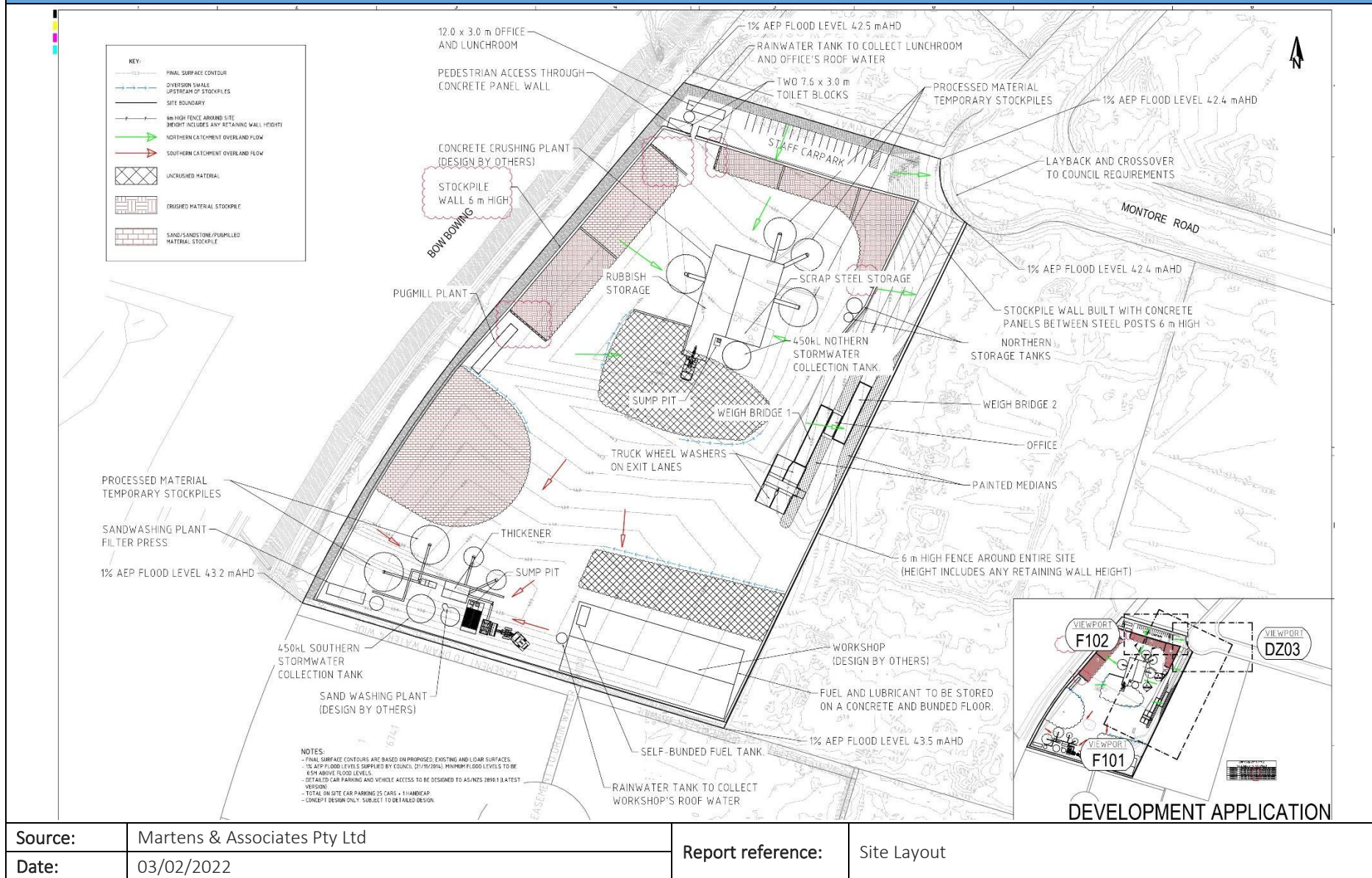


Figure 3: Site layout plan.

Council flood mapping

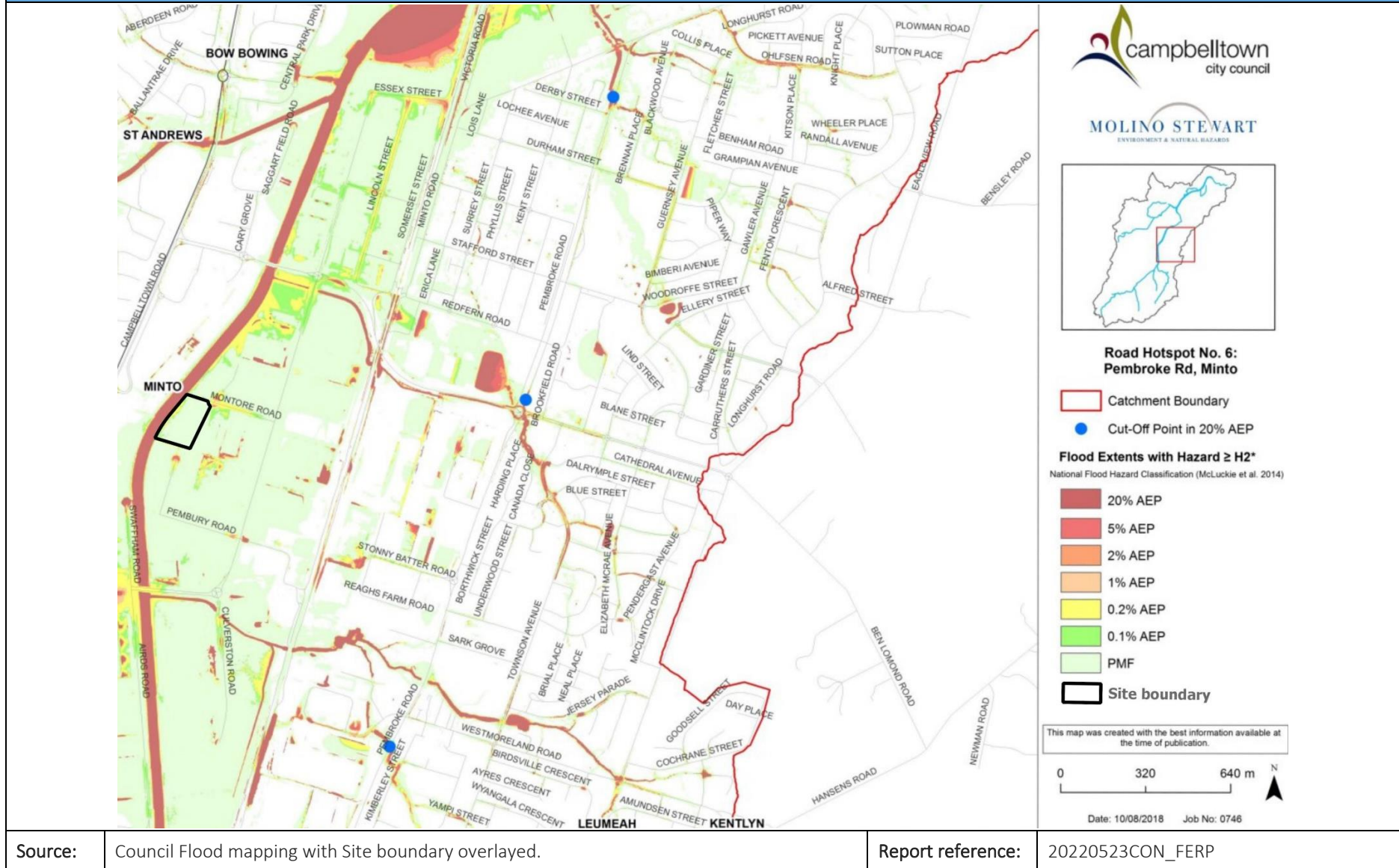


Figure 4: Flood mapping from the Bow Bowling Bunbury Curran Creek Strategic Floodplain Risk Management Study and Plan.

Site evacuation route



Drawn by:	KP	Report reference:	20220523CON_FERP	Key:	Refer to map legend.
Date:	6/7/22	Image source:	QGIS with Nearmap overlay (dated 15/6/22)		

Figure 5: Evacuation route to emergency flood assembly point.

Water Management Plan

Concrete Recyclers
7 Montore Road, Minto, NSW

Management plan reference:

CR_WatMP

August 2024



Report Reference: CR_WatMP

Version: V1.3

Published: 27 August 2024

Prepared for:

Concrete Recyclers (Group) Pty Ltd

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This document contains commercial-in-confidence information. Recipients and users of this document agree to hold the information presented within as confidential and agree not to disclose, or allow the disclosure, of this information to any other party, unless authorised, except to the extent required by law.

Acknowledgement of Country

Concrete Recyclers acknowledges the Traditional Owners of the land on which this site is located, the people of the Dharawal Nation. We acknowledge their continuing connection to land and sea Country and we pay our respects to their Elders past, present and emerging.

Document Control

Version	Issue Date	Details	Author	Authorisation
0.0	7 Sep 2023	Draft WatMP document for OEMP.	Kay Porter James Hammond	Concrete Recyclers (Group) Pty Ltd
1.0	5 Apr 2024	Final WatMP document for OEMP	Kay Porter James Hammond	Concrete Recyclers (Group) Pty Ltd
1.1	30 July 2024	Revisions based on Department comments received July 2024. Updated Site Layout Plan to most up-to-date version.	Rhys Thompson	Concrete Recyclers (Group) Pty Ltd
1.2	8 August 2024	Updating Overall Site Water Flow Diagram (Appendix 2) and providing clarity that the process presented in this diagram and D & M Consulting's 2023 Site Stormwater Cycle Report (Appendix 3) are equivalent, though to a different level of detail.	Rhys Thompson	Concrete Recyclers (Group) Pty Ltd
1.3	27 August 2024	Revising Site layout to current plan	Rhys Thompson	Concrete Recyclers (Group) Pty Ltd

1 Introduction

1.1 Background

4Pillars was engaged by Concrete Recyclers (Group) Pty Ltd to prepare a Water Management Plan (WatMP) as part of an Operational Environmental Management Plan (OEMP) for a proposed Resource Recovery Facility (RRF) at 7 Montore Road, Minto (the Site). The preparation of this WatMP is a requirement of Condition B23 of the Development Consent (SDS-5339) for the Site.

The RRF will accept up to 450,000 tonnes per annum of construction and demolition (C&D) waste for storage, processing and reuse. A maximum of 50,000 tonnes of unprocessed and 22,000 tonnes processed material of will be stored on Site at any one time.

1.2 Site details

The Site details are summarised in Table 1 below. Please refer to Figure 1 for a map of the Site locality.

Item	Details
Local Government Area	Campbelltown City Council
Address	7 Montore Road, Minto, NSW
Lot(s)	Lot 52 DP 618900
Zoning	IN1 – General Industrial (Campbelltown LEP 2015)
Site size (total)	23,500 m ² (2.35 ha)
Previous land use	Various commercial/industrial activities including waste and equipment storage. See Figure 2 for recent satellite imagery of the Site.
Intended future land use	Resource Recovery Facility
Surrounding land uses	IN1 – General Industrial (Campbelltown LEP 2015) SP2 – Drainage (Campbelltown LEP 2015)
Elevation	Approximately 43 m AHD above sea level
Hydrology	The Site is located on the south bank of Bow Bowing Creek, within the Bow Bowing Bunbury Curran (BBBC) Creek catchment.
Geology	Preliminary Site Investigation determined a layer of fill material (up to 1 m depth) is present on the Site. The natural materials underlying the Site are expected to be primarily clay, shale and laminate.

Table 1: Summary of Site details.

2 Application

The WatMP will provide the principles and procedures for the management of water during the operational phase of the development. It will guide the use, metering, and disposal of water on Site, as well as surface water and wastewater management with the aim of minimising offsite surface water impacts. Operations will not commence until this WatMP has been approved by the Planning Secretary, in accordance with Condition B24 of the Development Consent.

This WatMP has been prepared to comply with Conditions B23, B24 and C5 of the Development Consent, as well as taking into consideration Appendix 2 of the Development Consent “*Applicant’s Management And Mitigation Measures*”. Table 1 below details where aspects of Condition B23 are addressed in this document.

Development Consent Condition	Section where addressed
B23. Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must form part of the OEMP required by condition C5. The Water Management Plan must:	
(a) be prepared by a suitably qualified and experienced person(s);	See Page 2.

Development Consent Condition	Section where addressed
B23. Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must form part of the OEMP required by condition C5. The Water Management Plan must:	
(b) detail water use, metering, disposal and management on-site;	See Section 4.
(c) detail the management of wastewater streams on-site;	See Section 4.1.
(d) include a Surface Water Management Plan, including;	See Section 4.
(i) a program to monitor: – surface water flows and quality; – surface water storage and use; and – sediment basin operation;	See Section 4.4.
(ii) surface water impact assessment criteria, including trigger levels for investigating any potential adverse surface water impacts; and	See Section 4.5.
(iii) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.	See Section 4.6.

Table 2: Where Condition B23 of the Development Consent are addressed in this WatMP.

This plan has also been developed in accordance with relevant State legislation and best-practice guidelines including:

- Campbelltown City Council's Sustainable City Development Control Plan (DCP) (2015); and
- 'Blue Book' Landcom (2004) Soils and Construction: Managing Urban Stormwater.

4Pillars has also taken into consideration the Environmental Impact Statement (EIS) for the Site, and the initial Site Water Management Plan developed by Martens & Associates Pty Ltd in March 2020 (ref: P1203464JR01V05) which supported the EIS. The WatMP supersedes this plan.

3 Site Context

The Site and surrounding properties are zoned as IN1 General Industrial. Bow Bowing Creek (zoned SP2 – Drainage) is the nearest receiving waterway and runs along the western border of the Site. The entirety of the Site is mapped within the Probable Maximum Flood (PMF) extent and areas of 0.1% - 20% Annual Exceedance Probability (AEP) are mapped along the perimeters of the Site. The Preliminary Flood Assessment for the Site assessed the hydraulic hazard for 1% AEP at the Site entrance to be low hazard. A riparian and groundwater impact assessment were included in the 2020 Martens & Associates *Site Water Management Plan*, which was considered during the preparation of this Plan.

4 Surface Water Management Plan

4.1 Site Water Usage

Total water demand for Site processes is expected to be approximately 127,000 L per day in winter, and 202,000 L per day in summer. The surface water management system allows for up to 440,000 L of treated water, supplying up to two to three days' worth of water required for Site operations. Water used in Site operations will be cycled through the surface water management system and re-used to reduce water demand.

Staff toilet facilities are expected to use 300 L per day, supplied by rainwater collection tanks. These rainwater collection tanks have a combined capacity of 5,000 L, or over two weeks' worth of water. Town water usage is minimal, supplying kitchen, handbasin and shower facilities on Site. Municipal wastewater generation on Site is estimated at approximately 750 L per day, and will be disposed of via the Sydney Water sewer main.

4.2 Surface Water Management System

The Site surface water management system has been developed in accordance with applicable Australian Standards and collects all surface water on Site to prevent any contaminated or sediment impacted stormwater from leaving the Site. Surface water collection measures described in the Environmental Impact Statement for the Site included sediment basins for the purposes of stormwater storage. However, some changes to the proposed development have been made since the submission of the EIS, with these changes reflected in this WatMP. Surface water (pre and post treatment) is now proposed to be collected in water storage tanks as shown in The Overall Site Water Flow Diagram (Appendix 2), rather than sediment basins as initially proposed. The diagram details the updated collection, treatment, and reuse

surface water system on the Site, as well as the instrumentation involved, and the specifics of the Water Treatment Plant. These specific details are not presented in the Site Stormwater Cycle Report (prepared in 2023 by D & M Consulting, Appendix 3), although the two diagrams reflect the identical overall process.

Two flowmeters are included in the surface water management system. The first is located at the inlet of the water treatment plant which will measure all collected stormwater on Site. The second is located at the outlet of the Southern Storage Tank to record treated water usage on Site.

Rainwater from the staff amenities roof is collected in a 2,000 L tank and utilised for staff amenities toilets. Rainwater from the workshop building roof is collected in a 50,000 L tank and stored for use in staff amenities toilets or other Site operations, as appropriate. The crushing plant water is collected in a 50,000L tank. The stormwater run-off from the driveway and carpark are directed to another 50,000L onsite storage tank for reuse.

All other rooftop rainwater and stormwater runoff on Site is collected in a series of sumps across the Site. Stormwater collected in the sumps is pumped through a flowmeter to a 25,000 L mixing tank where flocculant and pH dosing is applied before being pumped into one of two 100,000 L thickener tanks fitted with conductivity and pH sensors. Water separated from the thickener tanks is directed into the Primary Tank (50,000 L capacity). Some water is pumped directed from the Primary Tank for reuse in the sand washing plant, other water from the Primary Tank is pumped through a series of media filters, passes through a total suspended solids (TSS) meter and a turbidity sensor, and is collected in the Southern Storage Tank (898,000 L capacity). Water stored in the Southern Storage Tank has been completely treated by the Site stormwater treatment system and is re-used on Site for usage in the dust suppression sprinklers, wheel wash, pug mill, crushing shed, sand wash, yard cannon, sumps, and mixer/thickener tanks. Excess treated water in the Southern Storage Tank will be analysed according to the monitoring program in Section 4.4, and discharged into the Campbelltown City Council stormwater system via the Ocean Protect Ocean Cycle device.

The Site Stormwater Cycle Report (prepared in 2023 by D & M Consulting, Appendix 3) includes a MUSIC model of the Site surface water management system and assesses the treatment train against pollution reduction targets required by the Campbelltown City Council DCP. This Report also includes a summarised version of the Overall Site Water Flow Diagram presented in Appendix 2 (i.e. without any instrumentation or the specifics of the Water Treatment Plant).

4.3 Mitigation Measures

4.3.1 Sediment

A number of mitigation measures limit erosion on and around the Site. The surface water management system is closed, and prevents non-treated water from exiting the Site into the receiving waterway. The driveway is fitted with a vehicle wheel wash and trench grate which prevent vehicles from carrying sediment off-Site. The wheel wash water collects in the trench grate and drains into a sump before being directed through the Site surface water treatment system. Dust suppression measures will also be implemented on Site to prevent escape of airborne sediment.

Each site pit is provided with a Gross Pollutant Trap (GPT) to trap large sediment prior to collection.

Following large rain events the site surfaces will be inspected for sediment and ponding of water, and will be cleaned with a skid steer or other suitable device.

It is noted that these mitigation measures supersede Proposed Actions 1-7 as presented in the *Erosion and Sediment Control* section and Proposed Actions 1-7 as presented in the *Stormwater Management* section of Appendix 2 of the Development Consent *Applicant's Management And Mitigation Measures*, as these assumed that sedimentation basins would be a component of the water management system employed on the Site. The closed-water management system presented in Appendix 2 replaces the initially proposed sedimentation basins and is considered to be a much more suitable management strategy.

Proposed Actions 8-14 of the *Erosion and Sediment Control* section of Appendix 2 of the Development Consent are predominantly related to dust management, and as such have been incorporated into the Air Quality Management Plan for the Site.

4.3.2 Groundwater

While surface water poses negligible risk to groundwater (as per the 2020 Martens & Associates *Site Water Management Plan*), the below mitigation measures further limit groundwater impacts:

- The Site surface is constructed of compacted aggregate which will sufficiently limit surface water infiltration into groundwater.

- The Site surface water management system prevents non-treated water from exiting the Site where infiltration could occur.
- Trained use of spill kits and other spill controls will be implemented on Site in the event of a chemical or fuel spill.

4.3.3 Surface water

The Site construction and water management system prevent impacts on surface waters outside of the Site. The entirety of the Site is bunded, including a six-metre-high concrete bund wall separating the western boundary of the Site from the Bow Bowing Creek. As stated above, the surface water management system holds all water on Site until it is treated and suitable for discharge. The treatment system flocculates collected water, adjusts pH, and filters out suspended solids, heavy metals and nutrients. Fitted pH, conductivity, turbidity, and TSS meters/sensors ensure treatment is effective before waters are discharged into the Campbelltown City Council stormwater system. Surface water is re-used where possible on Site to limit the volume of discharged waters.

4.4 Monitoring Program

The most prominent pollution source on Site is sediment from stored and processed materials, with a lower potential for other contaminants such as plant/equipment fuel to enter the surface water system. This monitoring program outlines the required monitoring steps for Site water monitoring.

- The Site Manager or delegate must check the surface water management system meter/sensors each day to ensure treatment processes are effective.
- The Site Manager or delegate must record the flowmeter readings once per week to document Site water usage and capacity.
- Water monitoring must be conducted prior to discharge from the Southern Storage Tank. The Site Manager or delegate must record the pH, conductivity, turbidity and TSS sensor readings for two consecutive days prior to discharge into the Campbelltown City Council stormwater system.
- Discharge may only be carried out if pH, conductivity, turbidity and TSS measure below the assessment criteria specified in Section 4.5 below.
- Discharge must be supervised and will not continue outside of Site operation hours specified in the DA and EPL.
- Water monitoring must continue daily during active discharge. The Site Manager or delegate must record daily pH, conductivity, turbidity and TSS sensor readings.
- All water monitoring records must be filed and kept in hard copy on Site and provided to the Council upon request.

4.5 Assessment Criteria

Water monitoring results must be compliant with the water quality assessment criteria values for each analyte specified in Table 3. The water quality criteria values have been derived with reference to the Australian & New Zealand Guidelines for Fresh & Marine Water quality (ANZG) 2000.

Water quality criteria values may be subject to change in accordance with the conditions of the Site Environment Protection Licence (EPL) and other recommendations issued by the EPA.

In the event that water quality samples exceed any of the water quality assessment criteria values, discharge must not be carried out and the response protocols detailed in Section 4.6 below must be followed.

Analyte	Units	Limit of Reporting (LOR)	Water Quality Assessment Criteria Values	
			ANZECC/ARMCANZ (2000) - Tables 3.3.2 – 3.3.3 South-east Australia, Lowland rivers	ANZECC/ARMCANZ (2000) – Tables 4.4.2-4.4.3
pH	pH units	0.01	6.5 – 8.0	-
Conductivity	µS/cm	1	2200 (maximum)	-
Turbidity	NTU	0.1	50 (maximum)	-
Total suspended solids	mg/L	5	-	40

Table 3: Water quality assessment criteria values.

4.6 Response Protocols

The table below details possible trigger events that may impact water management, their potential impacts if not properly controlled, and the relevant response protocols required.

Trigger event	Potential impacts (uncontrolled)	Required Response Protocols
Exceedance of water quality criteria	Excess water accumulation that is unsuitable for discharge.	1. Discharge to Council stormwater system must not commence, or is to immediately cease; 2. If pH has exceeded, additional pH dosing may be required; 3. If conductivity, turbidity or TSS has exceeded, flocculating and thickening tank processes are to be checked; 4. Recirculation of water from the Southern Storage Tank through the treatment system may be required; 5. Discharge may only recommence once all analytes meet the assessment criteria for two consecutive days.
High rainfall/Flooding	Excess water accumulation in Site surface water management system.	1. Pre-emptive water monitoring and discharge may be required to ensure Site capacity is maximised; 2. Extra care to be taken to ensure water treatments are effective.
Fire	Fire-associated water entering the surface water management system/discharging.	1. Discharge to Council stormwater system must not commence, or is to immediately cease; 2. If fire controls were used on Site all water for discharge must be sampled for the presence of contamination and Council must be notified; 3. If contamination is identified, a water quality expert must be engaged for further advice; 4. Fire contaminated water must be disposed of at a liquid waste facility; 5. If contamination is not identified, discharge may recommence at the written approval of Council.

Table 4: Response protocols for potential trigger events.

5 Closing Statement

We note that this WatMP has been prepared for water management during the operational phase of this project, and will be revised as needed, in order to remain up to date with changes to Site operations or regulatory requirements.

6 Appendix List

Appendix 1: Figures and Maps

Appendix 2: Overall Site Water Flow Diagram

Appendix 3: Stormwater Cycle Report – D & M Consulting (2023)

Site locality



Drawn by:	KP	Report reference: CR_WatMP	Key:	Refer to map legend.
Date:	25/7/22	Image source: QGIS and Six Map overlay		

Figure 1: Site locality.

Aerial view of the Site (pre-development)



Drawn by:	KP	Report reference:	CR_WatMP	Key:	Refer to map legend.
Date:	6/7/22	Image source:	QGIS with Nearmap overlay (dated 15/6/22)		

Figure 2: Site boundary and aerial view.

Site layout (proposed)

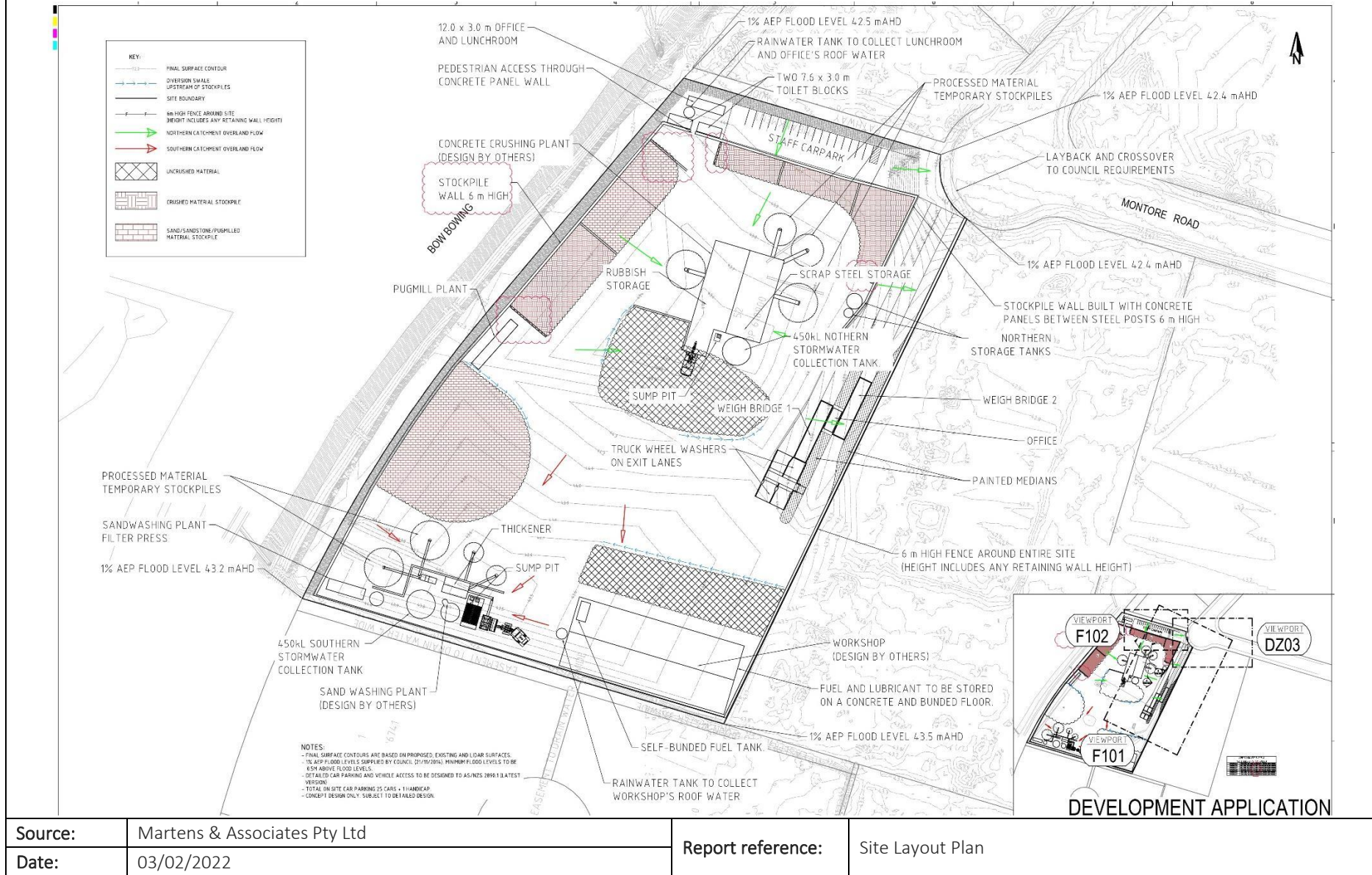


Figure 3: Site layout plan.

Council flood mapping

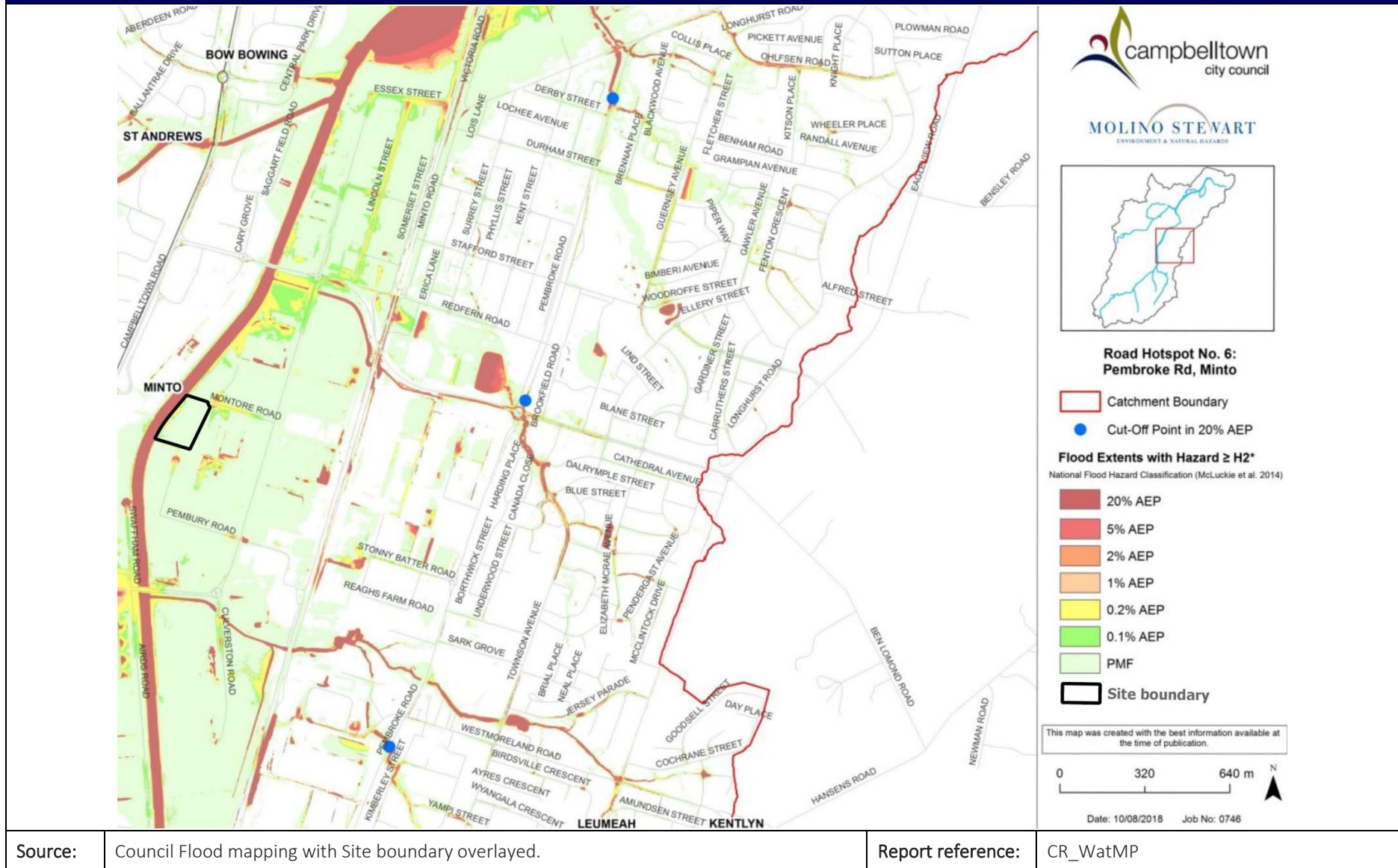
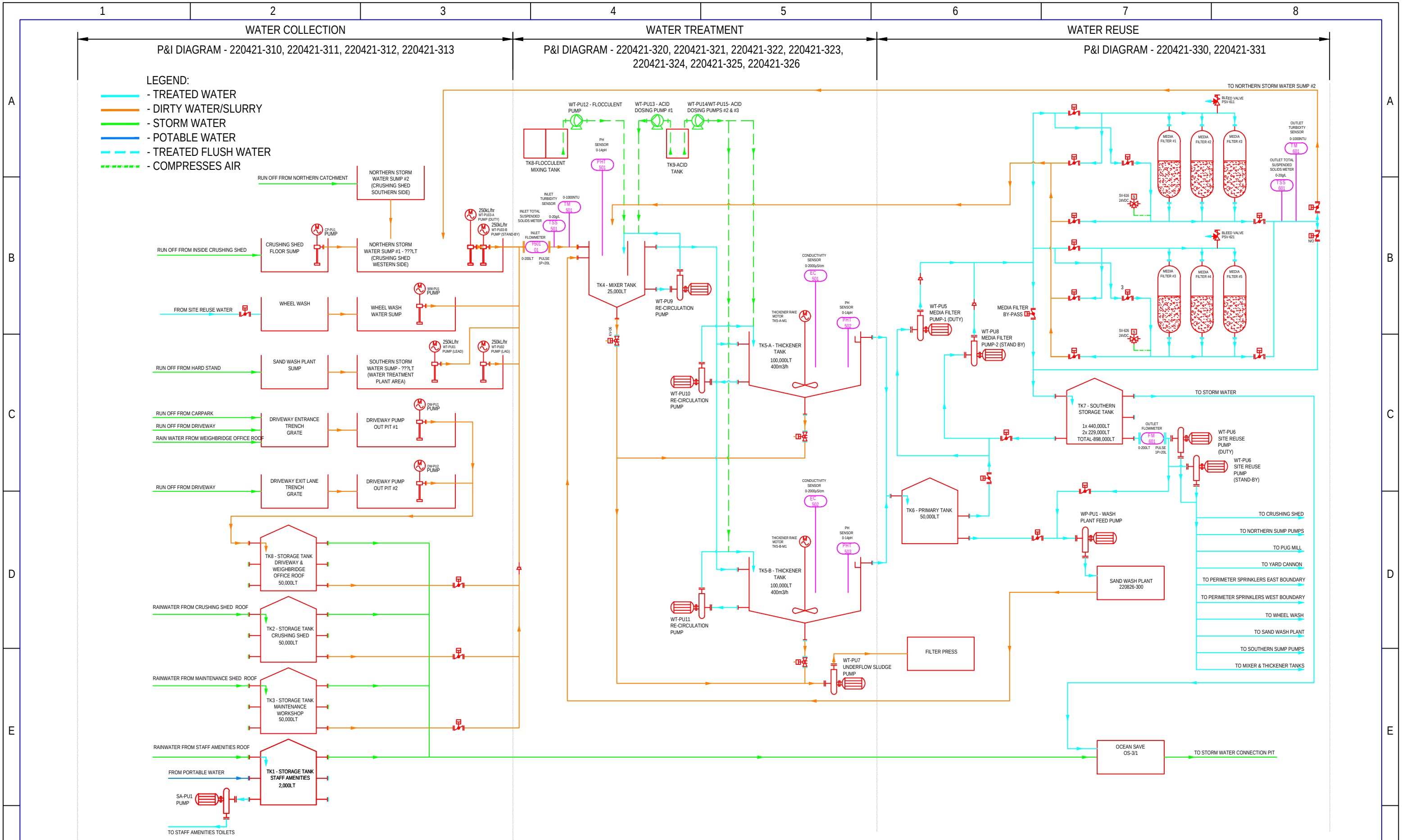
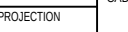


Figure 4: Flood mapping from the Bow Bowling Bunbury Curran Creek Strategic Floodplain Risk Management Study and Plan.



F	5	STORM WATER TANKS UPDATE	CS	AM	AM	06/08/2024	GENERAL NOTES: -DO NOT SCALE -ALL DIMENSIONS IN MILLIMETERS -GENERAL TOLERANCE UNO; LINEAR ±2; ANGULAR ±1°  This drawing is the PROPERTY OF CONCRETE RECYCLERS, PTY LTD and being Private and Confidential is supplied on the express condition that it is not to be used for any purpose or copied or communicated to any other person without our written consent.  <td>CLIENT CONCRETE RECYCLERS</td> <td>CONTRACT No.</td> <td rowspan="3">TITLE OVERALL SITE WATER FLOW DIAGRAM</td> <td rowspan="3">DRAWN CS</td>	CLIENT CONCRETE RECYCLERS	CONTRACT No.	TITLE OVERALL SITE WATER FLOW DIAGRAM	DRAWN CS				
	4	NORTHERN TANKS MOVED TO WT AREA	CS	AM	AM	13/11/2023		LOCATION MINTO NSW	JOB No. 220421						
	3	FLOC MIXING TANK ADDED	CS	AM	AM	06/03/2023		EQUIPMENT	DWG. REPLACED BY						
	2	MEDIA FILTERS UPDATE	CS	AM	AM	15/11/2022		CAD FILE No. 220421-300	DWG. REPLACES	PLANT CONCRETE CRUSHING PLANT	DATE 06/08/2024				
	1	ISSUE FOR REVIEW	CS	AM	AM	21/10/2022		SCALE NTS	SEP. PARTS LIST						
	0	ORIGINAL	CS	AM	AM	11/07/2022				DWG No. 220421-300	SHEET SIZE A3	REV. 5			
	REV.	DESCRIPTION	DRAWN	CHECKED	APPROVED	ISSUE DATE									
1		2		3		4		5		6		7		8	

30 November 2023

My Ref: 200319.WCS
Client: Concrete Recyclers
Project Address: Lot 52 (DP618900) 7 Montore Road, Minto
Project: Concrete Recycling Plant

Stormwater Cycle Report

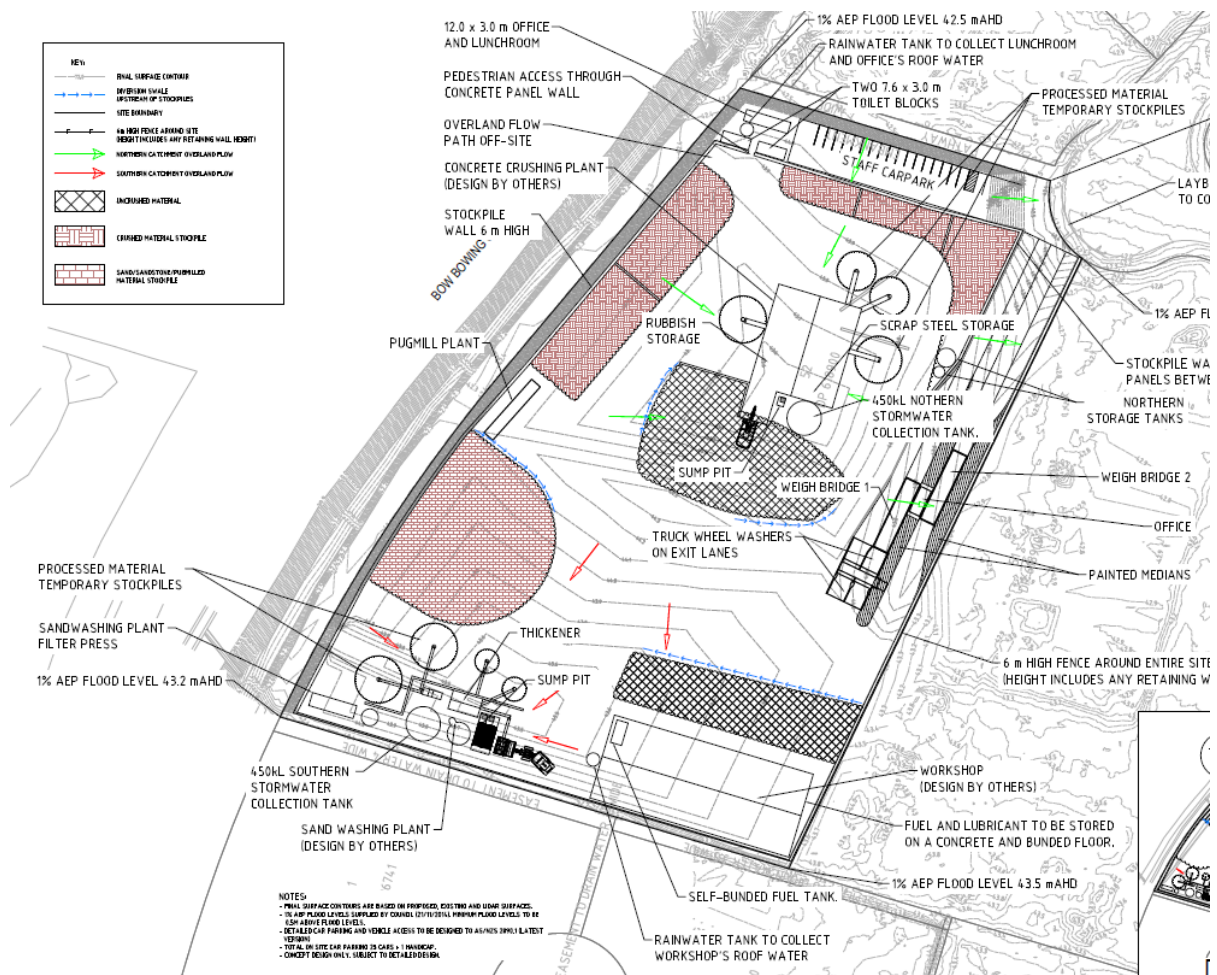


Figure 1: General Site Layout. 7 Montore Road, Minto NSW (North to the top of page)

Scope

This stormwater cycle report has been prepared by D & M Consulting to review the data prepared by Concrete Recyclers and assess the stormwater treatment system for the water usage as part of the site's internal processing as well as the frequency of stormwater discharging from the site.

General Stormwater Arrangement & Treatment

The site stormwater system has been designed to split the stormwater into two distinct treatment catchments. The first catchment area is for all the areas part of the recycling process where there is potential for waste material to enter the stormwater system. The stormwater from these catchment areas, the northern crushing plant and the southern material stockpile areas is collected and directed to a storage depressions and sumps where the water is pumped into the treatment plant where the stormwater is processed, treated and stored within storage tanks to be reused onsite as part of the processing of waste material and dust suppression system. During large rainfall events, the storage depressions can flood creating more storage capability onsite. This stormwater can then be pumped into the treatment plant and storage tanks. In the rare event that the total site storage reaches capacity and the tanks overflow. The overflow is directed to Ocean Protect OceanSave gross pollutant treatment system to treat the stormwater before discharge to Bow Bowing Creek.

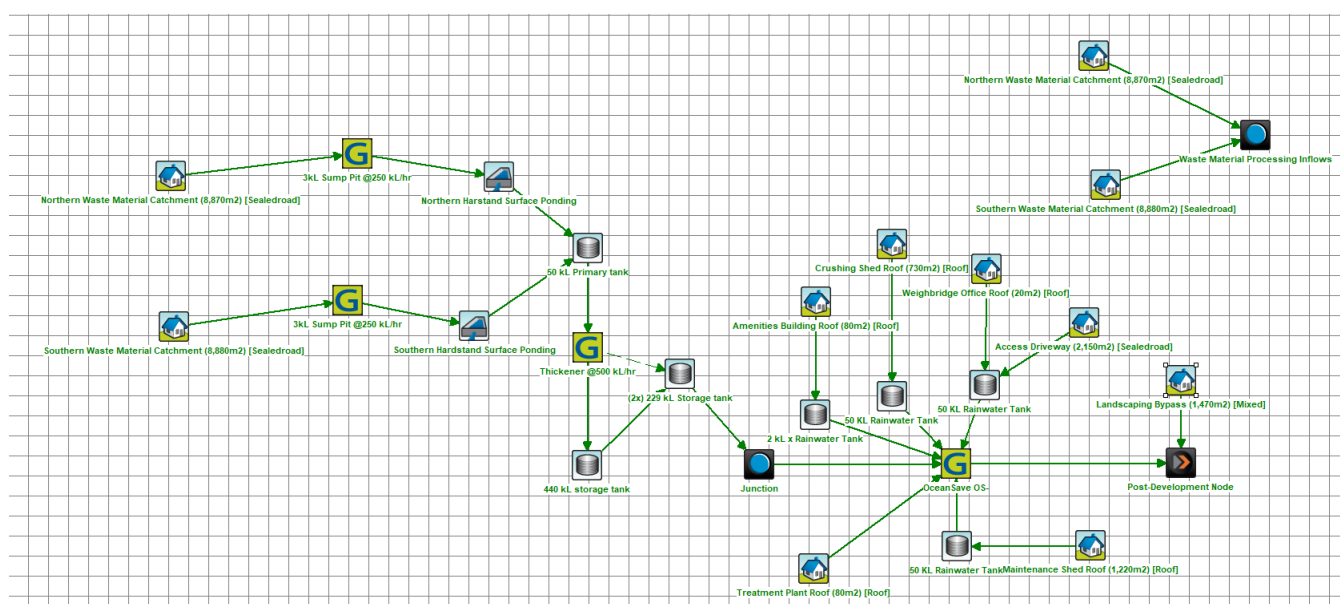
The Second Catchment area is for all the areas outside of the recycling process such as the main access driveway, the maintenance shed roof, the crushing plant shed roof, and the amenities building roof. This stormwater does not come into contact with the waste material being processed onsite. The roof and access driveway stormwater is collected into storage tanks where it can be pumped into the treatment plant to supplement water usage as part of the processing of waste material and dust suppression system. During rainfall events, the overflow from these storage tanks is directed into Ocean Protect OceanSave gross pollutant treatment system to treat the stormwater before discharge to Bow Bowing Creek.

A copy of the site water cycle schematic appears in Appendix A.

Site Water Storage Capacity

The stormwater storage capacity for the site has been increased from the DA approved MUSIC model and plans. Additional above-ground storage tanks have been provided such as the additional 50,000 litre rainwater tank from the Maintenance Shed and the 440,000 litre storage tank as part of the treatment plant. The northern and southern storage depression volumes have been recalculated with the north storage depression capacity calculated at 1,030m³ (1,030,000 litres). The south storage depression capacity is calculated at 1,118m³ (1,118,000 litres). A copy of the calculation for the northern and southern storage depression appears in Appendix B.

The treatment system has been revised since the DA-approved model prepared by Martens and Associates with the treatment being split into two distinct treatment catchments. (See Figure 2 Revised MUSIC model) This was done to evaluate the volume of stormwater outflowing from the waste material processing area over a 30-year period. The Waste Material Processing Inflows node was used to output the flow data to develop the attached spreadsheet to analyse the water balance for the site.



As a result, the proposed treatment train for 7 Montore Rd as modelled in MUSIC meets the pollution reduction targets as required by Section 4.15 of Campbelltown City Council DCP.

7 MONTORE ROAD TREATMENT TRAIN				
	Annual Pollutant Loading (kg/yr)			
	TSS	TP	TN	GP
Pre-Treatment Train	4220.00	7.130	31.50	355.00
Post-Treatment Train	113.00	0.532	6.06	0.00
Difference	4107.00	6.60	25.44	355.00
Reduction (%)	97.3%	92.5%	80.8%	100.0%
Target (%)	80.0%	45.0%	45.0%	90.0%
Meets Campbelltown Treatment targets	YES	YES	YES	YES

Should any of the above information be unclear, please contact the author for clarification.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'N. Yabsley', with a stylized flourish at the end.

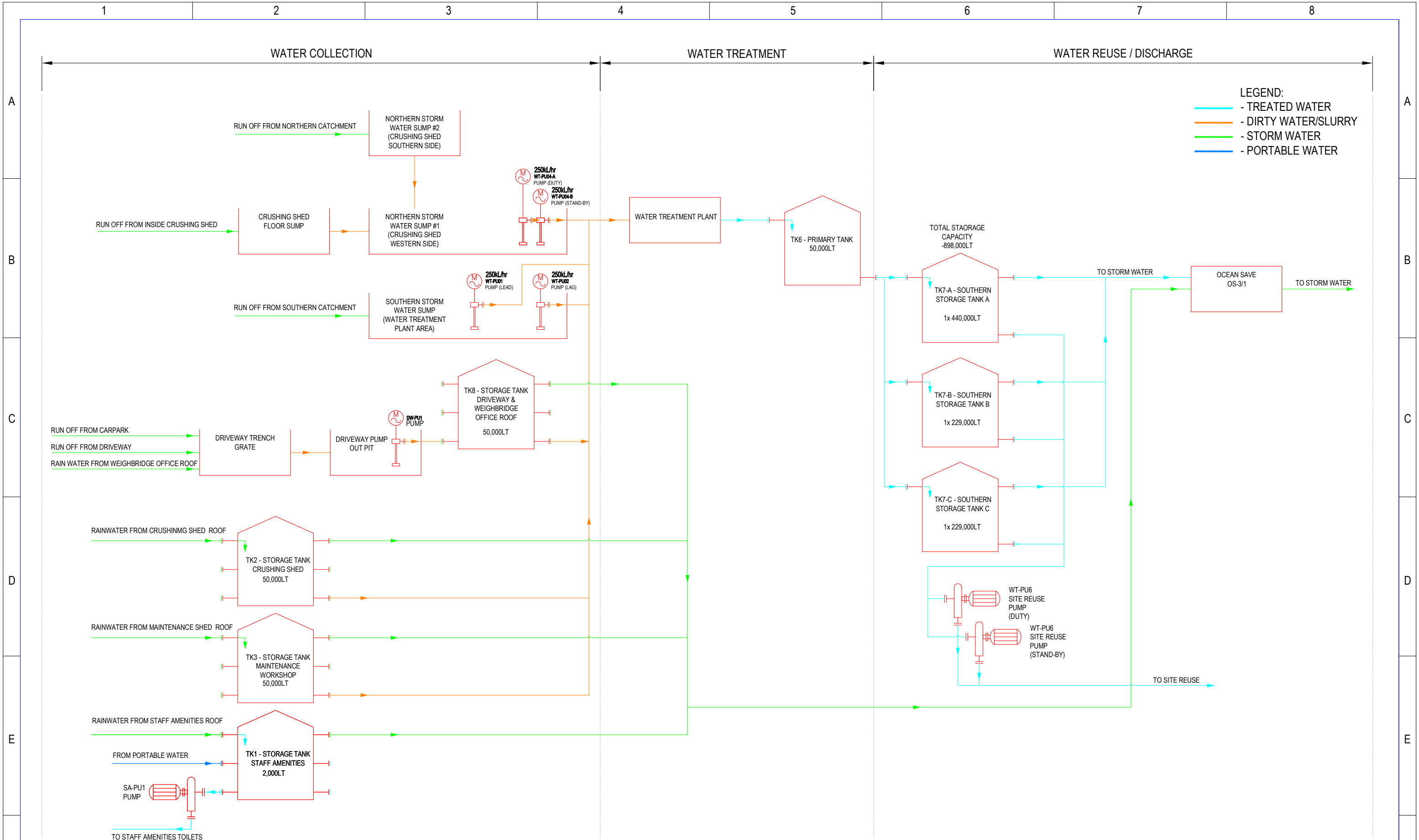
Nathan Yabsley

B.E. MIEAust. NER (5965400)

Appendix A



engineer@dmceng.com.au | www.dmceng.com.au
PO BOX 1304, NARELLAN NSW 2567



F	5					GENERAL NOTES: -DO NOT SCALE -ALL DIMENSIONS IN MILLIMETERS -GENERAL TOLERANCE UNO; LINEAR ±2; ANGULAR ±1°		CLIENT	CONCRETE RECYCLERS	CONTRACT No.		TITLE	DRAWN		CS	F
	4							LOCATION	MINTO NSW	JOB No.	220421		CHECKED		AM	
	3							EQUIPMENT		DWG. REPLACED BY			APPROVED		AM	
	2							CAD FILE No.	220421-300	DWG. REPLACES		PLANT	DATE		18/11/2023	
	1	ISSUE FOR REVIEW	CS	AM	AM	18/11/2023		SCALE	NTS	SEP. PARTS LIST			SHEET SIZE		A3	
	0	ORIGINAL	CS	AM	AM	20/09/2023						DRG No.	REV.		1	
	REV.	DESCRIPTION	DRAWN	CHECKED	APPROVED	ISSUE DATE										
		1														
		2														
		3														
		4														
		5														

Waste Management Plan

Concrete Recyclers
7 Montore Road, Minto, NSW

Management plan reference:

CR_WMP

June 2024



Report Reference: CR_WMP

Version: V1.3

Published: 27 June 2024

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Acknowledgement of Country

Concrete Recyclers acknowledges the Traditional Owners of the land on which this site is located, the people of the Dharawal Nation. We acknowledge their continuing connection to land and sea Country and we pay our respects to their Elders past, present and emerging.

Document Control

Version	Issue Date	Details	Author	Authorisation
0.0	29 Nov 2023	Draft WMP document for OEMP.	Kay Porter James Hammond	Concrete Recyclers (Group) Pty Ltd
1.0	8 Apr 2024	Final WMP document for OEMP.	Kay Porter James Hammond	Concrete Recyclers (Group) Pty Ltd
1.1	14 May 2024	Minor formatting amendment.	Kay Porter James Hammond	Concrete Recyclers (Group) Pty Ltd
1.2	7 June 2024	Revisions based on Department comments received May 2024.	Rhys Thompson	Concrete Recyclers (Group) Pty Ltd
1.3	27 June 2024	Revisions based on Department comments received 26 June 2024, update of plans to latest approved versions.	Rhys Thompson	Concrete Recyclers (Group) Pty Ltd

1 Introduction

4Pillars has prepared this Waste Management Plan (WMP) on behalf of Concrete Recyclers (Group) Pty Ltd as part of an Operational Environmental Management Plan (OEMP) for a Resource Recovery Facility (RRF) at 7 Montore Road, Minto (the Site). The preparation of this WMP is a requirement of Condition B38 of the Development Consent (SSD-5339) for the Site.

Construction stages of the RRF include initial remediation followed by earthworks to level the Site. An asphalt or concrete hardstand will be installed across the Site and then Site structures (sheds, workshops, Site office etc.) and equipment (pugmill, screening equipment etc.).

The RRF will accept up to 450,000 tonnes per annum of construction and demolition (C&D) waste for storage, processing and reuse. A maximum of 50,000 tonnes of unprocessed and 22,000 tonnes processed material of will be stored on Site at any one time. Waste material will be processed to produce recycled aggregate and road base products.

1.1 Site Details

The Site details are summarised in Table 1 below. Please refer to Figure 1 for a map of the Site locality.

Table 1: Summary of Site details.

Item	Details
Local Government Area	Campbelltown City Council
Address	7 Montore Road, Minto, NSW
Lot(s)	Lot 52 DP 618900
Zoning	IN1 – General Industrial (Campbelltown LEP 2015)
Site size (total)	23,500 m ² (2.35 ha)
Previous land use	Various commercial/industrial activities including waste and equipment storage. See Figure 2 for recent satellite imagery of the Site.
Intended future land use	Resource Recovery Facility
Surrounding land uses	IN1 – General Industrial (Campbelltown LEP 2015) SP2 – Drainage (Campbelltown LEP 2015)
Elevation	Approximately 43 m AHD above sea level
Hydrology	The Site is located on the south bank of Bow Bowing Creek, within the Bow Bowing Bunbury Curran (BBBC) Creek catchment.
Geology	Preliminary Site Investigation determined a layer of fill material (up to 1 m depth) is present on the Site. The natural materials underlying the Site are expected to be primarily clay, shale and laminate.

2 Application

The WMP will provide the principles and procedures for the management of waste during the construction and operational phases of the development. It will guide the handling, storage and disposal of waste on Site, with the aim of minimising waste generation, maximising re-use and recycling and preventing pollution from hazardous wastes. Operations will not commence until this WMP has been approved by the Planning Secretary, in accordance with Condition B39 of the Development Consent.

This WMP has been prepared to comply with Conditions B38 and C5 of the Development Consent and address the requirements of Conditions B39 - B44. Table 2 below details where aspects of Conditions B38 – B41 are addressed in this document.

Table 2: Where relevant Development Consent documents are addressed in this WMP.

Development Consent Condition	Section where addressed
B38. Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development to the satisfaction of the Planning Secretary. The Waste Management Plan must form part of the OEMP and be prepared in accordance with condition C5. The Plan must:	
(a) detail the type and quantity of waste to be generated during construction and operation of the development;	Sections 3.3 & 4.2.
(b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the <i>Protection of the Environment Operations Act 1997</i> , <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the <i>Waste Classification Guideline</i> (Environment Protection Authority, 2014);	Section 3.
(c) detail the materials to be reused or recycled, either on or off site;	Section 3.3.
(d) include the Management and Mitigation Measures included in Appendix 2.	Section 3.2.
B39. The Applicant must:	
(a) not commence operation until the Waste Management Plan is approved by the Planning Secretary;	
(b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary.	Section 2.
B40. Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	Section 4.
B41. From the commencement of operation of the development, the Applicant must implement a Waste Monitoring Program for the development. The program must:	
a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;	Section 6.
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; and	Sections 3.3 & 4.
c) ensure that:	
i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and	Section 4.
ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	Section 6.4.

This plan has also been developed in accordance with relevant State legislation and best-practice guidelines including:

- Protection of the Environment Operations Act 1997;
- Protection of the Environment Operations (Waste) Regulation 2014;
- Waste Levy Guidelines (Environment Protection Authority, 2018);
- Waste Levy Benchmark Requirements (Environment Protection Authority, 2019);
- Waste Classification Guideline (Environment Protection Authority, 2014);
- Standards for managing construction waste in NSW (Environment Protection Authority, 2019);
- Management of asbestos in recycled construction and demolition waste (WorkCover NSW 2010);
- Waste Avoidance and Resource Recovery Act 2001 No 58; and
- NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.

3 Management of Generated Waste

This section refers to waste that is generated on-Site (not including processed stockpiles on Site). This includes but is not limited to general waste generated by Site staff, packaging waste from office and site supplies, e-waste and maintenance wastes.

3.1 Waste Management Principals

Better practice waste management throughout the course of the development is important, both financially and for the purposes of sustainability. Waste on Site will be managed in accordance with the principles and hierarchy detailed in the Waste Avoidance and Resource Recovery Act 2001 No 58. The waste management hierarchy is as follows:

1. *Avoidance (reduce the amount of waste generated)*

Waste avoidance is best achieved via an efficient procurement process. This may mean that orders for construction supplies are scrutinised prior to being completed, or that (for essential or regularly purchased items) procurement rules are in place to ensure preferred suppliers are those that minimise packaging or superfluous materials. Waste avoidance may also include opting for re-usable staff-use products and keeping digital rather than hard copies of records and documents where possible.

2. *Resource Recovery (re-use, recycling, reprocessing, energy recovery)*

Once the development reaches operational phase as an RRF, its purpose will be recycling C&D wastes for re-use. Waste generated during the construction phase of the development will not be able to be recycled on-Site, however, waste types that are suitable for resource recovery will be transported off-Site to an appropriately licenced facility. Recyclable waste will be sorted and separated on-Site to be collected for off-site recycling.

3. *Disposal*

Disposal of some wastes generated via site activities will be unavoidable. Where non-reusable or recyclable materials are generated, they will be disposed of in a lawful and efficient manner at an appropriately licenced waste facility.

3.2 Waste Generation Mitigation

The following mitigation measures pertaining to waste management were included in Table 16-1 of the EIS (Nexus Environmental Planning 2020):

1. Maintain separate receptacles for recyclables to be taken off site for recycling.
2. Non-recyclable waste to be disposed of at registered landfill.
3. No putrescible material to be disposed of on site.
4. Encouragement of employees to adopt waste-reducing practices.
5. Paper recycling trays provided in office areas for scrap paper collection and recycling.
6. Printer toners/ink cartridges collected in allocated bins for appropriate contractor recycling.
7. Development of purchasing policy to include purchase of recycled products.
8. Providing recycling collections within each of the offices (e.g. plastics, cans and glass and also paper and cardboard if not collected separately).
9. The office and amenities will have its own waste and recycling storage area where the recycling and garbage bins will be stored prior to collection.
10. Green waste will be mulched and re-used in landscaping on-site or taken off-site for landscape works.
11. Steel will be recycled off-site.
12. Timber will be recycled off-site.
13. Waste oil will be recycled or disposed of in an appropriate manner.
14. All glass which can be economically recycled will be.
15. Container and paper/cardboard recycling will be provided on-site for employee use or these items will be sorted recycling at an appropriately licensed facility.
16. All garbage will be disposed of via a Council approved system.
17. All contaminated and hazardous wastes (i.e. fluorescent tubing, batteries, e-wastes) will be recycled at an appropriately licensed facility.

18. E-waste (electronic waste such as computers, mobile phones, printer toners and ink cartridges) and batteries containing heavy metal contaminants will be recycled at an appropriately licensed recycling facility.
19. Liquid, semi-liquids or moist substances will not be placed in waste containers, unless securely wrapped or contained to prevent the substance from leaking.
20. Any liquid wastes or dangerous goods wastes should be disposed of by a suitably qualified contractor to an appropriately licensed disposal facility.
21. No liquid wastes or wash down waters should be disposed of via the stormwater drainage system.

These commitments will be adhered to throughout the construction and operational stages of the development.

3.3 Waste Types, Quantities, and Management

Table 3 below outlines the types of waste expected to be generated on Site and how they will be managed. Note that this table does not include materials accepted on the Site in accordance with the EPL, which are presented in Table 4.

All wastes will be classified as per the NSW EPA Waste Classification Guidelines Part 1: Classifying waste 2014 (or as superseded from time to time), so that they may be managed or disposed of appropriately.

As the Site is not yet operational, exact quantities of waste that are expected to be generated are difficult to quantify. The assumptions used to estimate these quantities have been presented in Appendix 2.

Table 3: Waste types expected to be generated and associated management approaches. *See Section 3.3 regarding estimation of these quantities.

Waste type	Waste classification (per NSW EPA Guidelines)	Source(s)	Phase of Development	Quantity* (t/year)	Managemen t Principal	Details
Food waste/scraps	General Solid Waste (putrescible)	Construction and operational staff - Office bins, kitchen bins	Construction and Operational	1.25	Disposal	General waste bins will be located on the Site for staff to utilise. They will be differentiated from recycling bins with coloured lids. They will be removed for disposal by a suitable contractor and disposed of as general waste at an appropriately licenced facility.
Timber	General Solid Waste (non-putrescible)	Pallets, deliveries	Construction and Operational	1.6	Resource Recovery	Timber will be stored in skip bins, awaiting removal for recycling by a suitable contractor.
Paper/cardboa rd	General Solid Waste (non-putrescible)	Office bins, Workshop bins	Construction and Operational	<1	Resource Recovery	Paper/cardboard bins for staff use will be provided on Site and differentially coloured. They will be removed and recycled at an appropriately licenced facility.
Paints and empty paint containers	Hazardous waste	Workshop bins	Construction and Operational	<1	Resource Recovery / Disposal	Paints will be removed and recycled (where possible) or disposed of by a suitably qualified waste contractor.
Green waste	General Solid Waste (non-putrescible)	Removal of vegetation on Site	Construction	250	Resource Recovery	Green waste will be mulched and used for landscaping purposes either on or off-Site.
Construction and demolition waste	General Solid Waste (non-putrescible)	Removal of old hardstand	Construction	150	Resource Recovery	Any material that can be reused on site will be (e.g. processed hardstand), and excess demolition waste will be transported to a suitable licenced facility for recycling.
Plastics and glass	General Solid Waste (non-putrescible)	Office bins, Site bins, construction bins	Construction and Operational	1-2	Resource Recovery / Disposal	Co-mingled recycling bins will be differentially coloured. They will be removed by a waste contractor and recycled (where possible) or disposed of at an appropriately licenced facility. Larger/other plastics that are not appropriate for co-mingled recycling will be stored in skip bins, awaiting removal for recycling by a suitable contractor.
Steel	General Solid Waste (non-putrescible)	Site bins, workshop bins, construction bins	Construction and Operational	5 (Construction) 1 (Operational)	Resource Recovery	Steel will be captured and removed by a suitable contractor for recycling off-Site.

Waste type	Waste classification (per NSW EPA Guidelines)	Source(s)	Phase of Development	Quantity* (t/year)	Management Principal	Details
Other metals	General Solid Waste (non-putrescible)	Workshop bins, construction bins	Construction and Operational	<1	Resource Recovery	Other metals will be captured in a specific bin and periodically removed by a suitable contractor for recycling. The exception to this may be aluminium cans, generated near the office/lunchroom. Cans may be captured separately and recycled or taken to a facility/machine involved in the Container Deposit Scheme.
Chemicals	Liquid Waste or Hazardous Waste	Workshop bins	Operational	<1	Resource Recovery / Disposal	Waste chemicals will be managed on a case-by-case basis. Wherever possible and lawful, chemical waste will be recycled rather than disposed of.
Hydrocarbon waste (oils and fuels, including hydrocarbon contaminated water)	Liquid Waste	Workshop, spills, and machines	Construction and Operational	<1	Resource Recovery / Disposal	Hydrocarbon waste materials will be captured and stored securely on-Site. They will be removed promptly by a suitable contractor and either recycled or disposed of.
E-waste	General Solid Waste (non-putrescible) or Hazardous Waste	Office bins	Operational	<1	Resource Recovery / Disposal	E-waste (electronic waste including computers, mobile phones, batteries, printer toners and ink cartridges) will be sorted for separate recycling at appropriate facilities. Where no recycling options are available, materials will be removed by contractors and taken to an appropriately licenced waste facility for disposal.
Other, specialist wastes	Various	Various	Construction and Operational	<1	Likely Disposal	Other wastes will be managed as required, at the direction of the site manager.
Various	Hazardous Waste	Illegal import, spills	Operational	<1	Disposal / Resource Recovery (unlikely)	Refer to Section 5. Hazardous waste to be removed from Site for disposal, tracking requirements may apply. Where possible, resource recovery pathways will be pursued, but are considered unlikely due to the anticipated nature of the waste materials.

4 Management of Received and Processed Waste

This section refers to waste types that are received at the Site for storage and processing, as well as the processed waste stored on Site as product. According to Condition B41(c):

(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site

The facility is not licenced to receive special waste (i.e. asbestos and waste tyres) or hazardous waste, and therefore is not expected to receive any waste controlled under a tracking system. However, in the event that special or hazardous waste is identified on-Site, the protocols and management procedures in Section 5 should be followed.

4.1 Waste Management Principals

Waste will be received, processed and transported from the facility as per the Protection of the Environment Operations (Waste) Regulation 2014. Incoming mixed C&D waste (that does not meet the requirements of a resource recovery order) will be managed according to the EPA's Standards for Managing Construction Waste in NSW. Received and processed waste materials will be stockpiled within the designated waste storage stockpile areas shown in Figure 3, Figure 4, and Figure 5. Stockpiles will be monitored and maintained as per the Waste Monitoring Program in Section 6.

Illegal wastes received unintentionally will be managed in accordance with Section 5.

4.2 Waste Types and Quantities

The table below summarises the waste types and quantities permitted to be received on Site under the Environment Protection Licence (EPL No. 21828).

Table 4: Waste types received on Site and the maximum quantities permitted (in tonnes per annum (tpa)).

Waste Material	Waste classification (per NSW EPA Guidelines)	Details (source, processing and use)
Unprocessed/Received Material (50,000 t)	Concrete & Bricks	General Solid Waste (non-putrescible)
	Sand/Sandstone	General Solid Waste (non-putrescible)
	Asphalt	General Solid Waste (non-putrescible)
Processed Material/Product (22,000 t)	Recovered Aggregate	General Solid Waste (non-putrescible)
	Recycled Road Base	General Solid Waste (non-putrescible)

	Washed Sand	General Solid Waste (non-putrescible)	Sand processed through the sand washer will be separated into stockpiles on the western boundary of the Site. Washed sand product will be used in road base and cement mixes.
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5 Management of Illegal and Hazardous Waste

The primary sources of hazardous waste that may occur on Site include illegal waste (i.e., waste not permitted for receipt on Site) brought on to Site (e.g. asbestos waste), used spill kit materials or land on which a spill occurred that has been excavated as part of the procedures outlined in the Emergency Response Plan. Other minor sources of waste include batteries, and chemical and paint waste.

5.1 Asbestos/Illegal Waste

Illegal waste may be identified in incoming waste loads during the two-point inspection process or found within stockpiles. Asbestos or other illegal wastes identified in incoming loads will be managed with incoming waste receipt/rejection procedures – detailed in the Waste Monitoring Program (Section 6.1). Asbestos or other illegal wastes identified within stockpiles on Site will be managed according to an Asbestos Management Plan or the Site Pollution Incident Response Management Plan (PIRMP), as appropriate. An internal review will then be conducted into waste receipt processes to prevent future incidents.

5.2 Contaminated Soil

Contaminated soil may be generated on Site following a fuel or chemical spill coming into contact with the ground. It is an unlikely event due to the hardstand protecting the ground across the majority of the Site. Spill kit materials may also generate contaminated soil once used. Should any ground material become contaminated on Site, it will be excavated and stockpiled separately from other wastes at the Site. Any contaminated soil on Site will be disposed of at an appropriately licenced waste facility.

5.3 Other Hazardous Waste or Liquid Waste

Other hazardous wastes such as e-wastes or liquid waste such as chemicals and fuels are expected to be generated in very low quantities on Site. They will most likely be removed by contractors and taken to an appropriately licenced waste facility to be disposed of.

Where any illegal waste is received on the Site, and the movement of this waste (i.e. removal from the Site) requires tracking under Part 4 of the Protection of the Environment Operations (Waste) Regulation 2014 (Waste Regulation), these requirements (such as the use of The Integrated Waste Tracking Solution (IWTS)) will be followed. In the case that illegal wastes are identified as having been received on the Site, further information can be found on the NSW EPA's website: <https://www.epa.nsw.gov.au/your-environment/waste/tracking-transporting-hazardous-waste>.

6 Waste Monitoring Program

The waste monitoring program will provide the monitoring procedures for received and processed waste on the Site.

6.1 Waste Transaction Data

Data will be recorded in the weighbridge software system for every incoming and outgoing waste load or transaction. Information will be recorded according to the Waste Regulation (2014), the Waste Levy Guidelines (EPA, 2018), and the Waste Levy Benchmark Requirements (EPA, 2019) for each transaction. This will include information on the:

- Site's EPL number and location;
- transaction and docket number;
- waste type, stream and quantity;
- time and date of entry and exit;
- vehicle type and registration;
- customer name, address and ABN;

- direction (whether waste material is entering or exiting the facility);
- gross, tare and net weight;
- destination (EPL if applicable) and purpose OR source of material;
- whether the waste is required to be reported under the Waste Contribution Monthly Report;
- EPA levy rate; and
- any additional information required.

Each record will be retained for at least 6 years.

6.2 Incoming Waste Inspection Requirements

Loads of incoming waste will be inspected according to the Standards for managing construction waste in NSW (EPA 2019). Incoming truckloads will be visually inspected at the weighbridge by trained personnel. If asbestos waste is suspected to be present, the load will be rejected, and the truck driver will be instructed to leave the Site. The date, time, vehicle registration, waste type and the reason for rejection will be recorded in the Site's Rejected Loads Register. If necessary, a rejected load certificate will be issued to the driver. The Rejected Loads Register should record:

1. Waste type/s
2. Time and date
3. Vehicle registration
4. Reason for rejection

Loads of sand and sandstone will proceed from the weighbridge directly to the designated stockpile area.

Trucks carrying bricks and concrete will continue to the tip and spread inspection area (see Figure 6). The entire load of each truck will be spread in the area and visually inspected for asbestos or other illegal waste. The detection of any asbestos or other illegal waste will result in the load being rejected. Accepted loads will be sorted and stored in separate, labelled stockpile areas.

All outgoing waste material must be recorded, inspected and stored according to Sections 6.1 and 6.3 before leaving the Site.

6.3 Waste Storage

Unprocessed and processed waste will be stored in distinct separate stockpiles within the stockpile areas identified in Figure 3, Figure 4, and Figure 5. Stored waste will be inspected by the Site Manager or delegate **daily** to ensure:

- Waste types are separated into distinct storage areas;
- Each storage area is clearly labelled;
- No contaminants are present in material;
- Waste materials not stored in enclosed bays are kept in distinct stockpiles; and
- Stockpiles of different material types are separated by at least 3 m from the base (does not apply to stockpiles of the same waste type).

All observations will be recorded daily by whoever carries out the inspection and records will be kept at the Site office for at least three years. If the storage of any waste is found to not comply with the above requirements, measures will be made immediately to correct the storage and stockpiling of the waste.

Material awaiting validation

If material is stockpiled/stored that has been assessed in accordance with a resource recovery order (RRO) and is awaiting compliance test results, the labels or signposts for this material must also contain the words 'awaiting validation', as per Section 4.1 of the EPA's Standards for Managing Construction Waste in NSW (2019). It is noted that in general, recovered aggregate is expected to be generated at the Site as part of a continuous process, in which case only the material assessed during the initial characterisation sampling step (detailed in Section 4.2.1 of the Recovered Aggregate RRO) will require this labelling, as continuously generated material does not require validation in batches prior

to removal from the Site. However, if any batch testing for other RRO material is undertaken or if recovered aggregate is not generated as part of a continuous process, this labelling would be required.

6.4 Training

All staff involved in the management of waste on Site will be trained in the contents of the POEO Act and the Waste Regulation, and the Site's Environment Protection Licence (EPL) requirements, when relevant. Site personnel must be trained in asbestos identification and handling (asbestos awareness training recommended). Any personnel responsible for the inspection of incoming waste may require further asbestos training.

7 Closing Statement

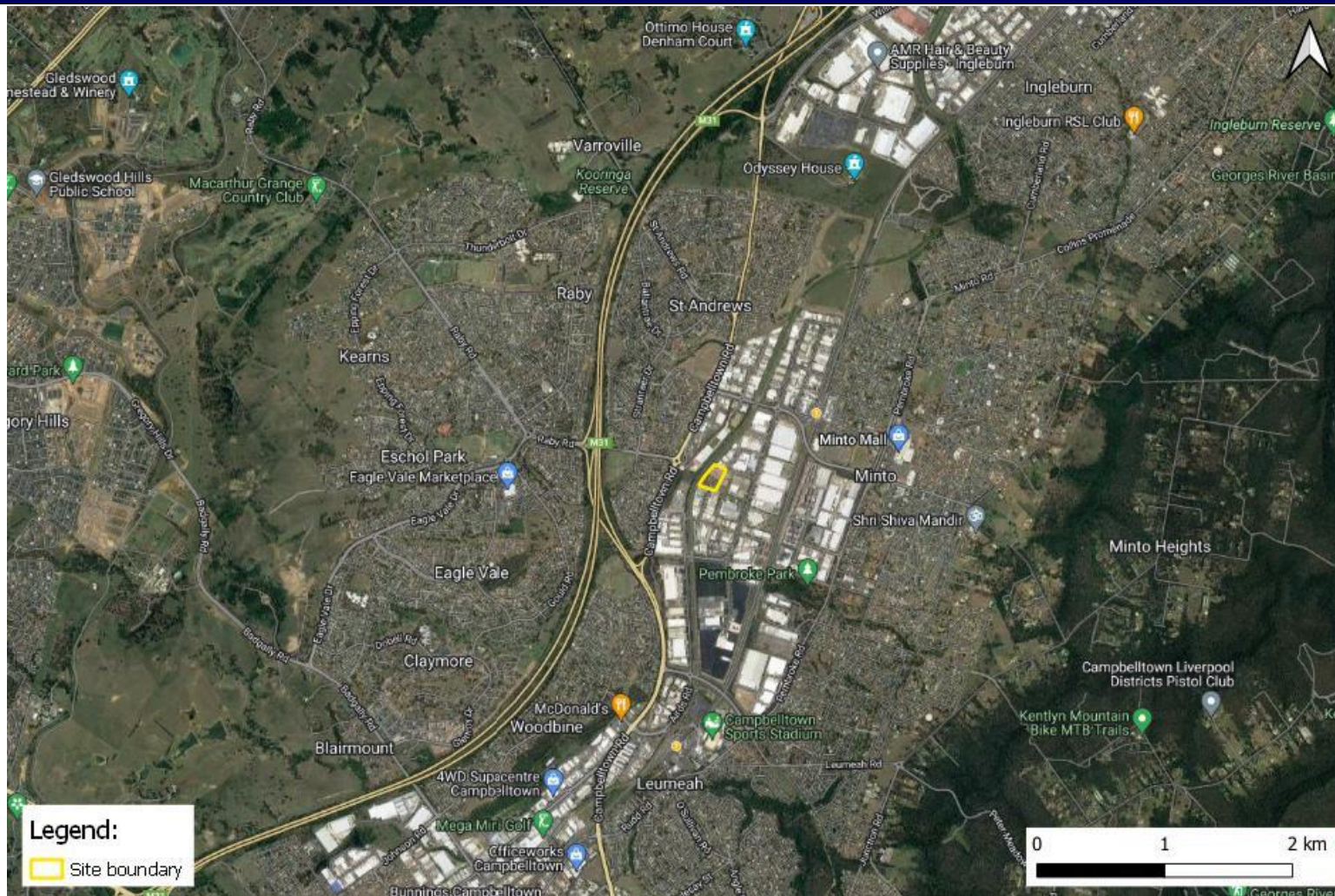
This Waste Management Plan (WMP) covers the construction and operational phases of the development. It guides the management of waste on site, with the aims of minimising waste generation, maximising re-use and recycling and preventing pollution. Over time, further knowledge regarding the specifics of Site waste management may become apparent, which will allow more targeted strategies to be developed and implemented. The WMP will be reviewed and updated yearly, or more frequently as required.

8 Appendix List

Appendix 1 Figures and Maps

Appendix 2 Waste quantity assumptions

Site locality



Drawn by:	KP	Report reference: CR_WMP	Key:	Refer to map legend.
Date:	25/7/22	Image source: QGIS and Six Map overlay		

Figure 1: Site locality.

Aerial view of the Site (pre-development)



Drawn by:	KP	Report reference:	CR_WMP	Key:	Refer to map legend.
Date:	6/7/22	Image source:	QGIS with Nearmap overlay (dated 15/6/22)		

Figure 2: Site boundary and aerial view.

Site layout

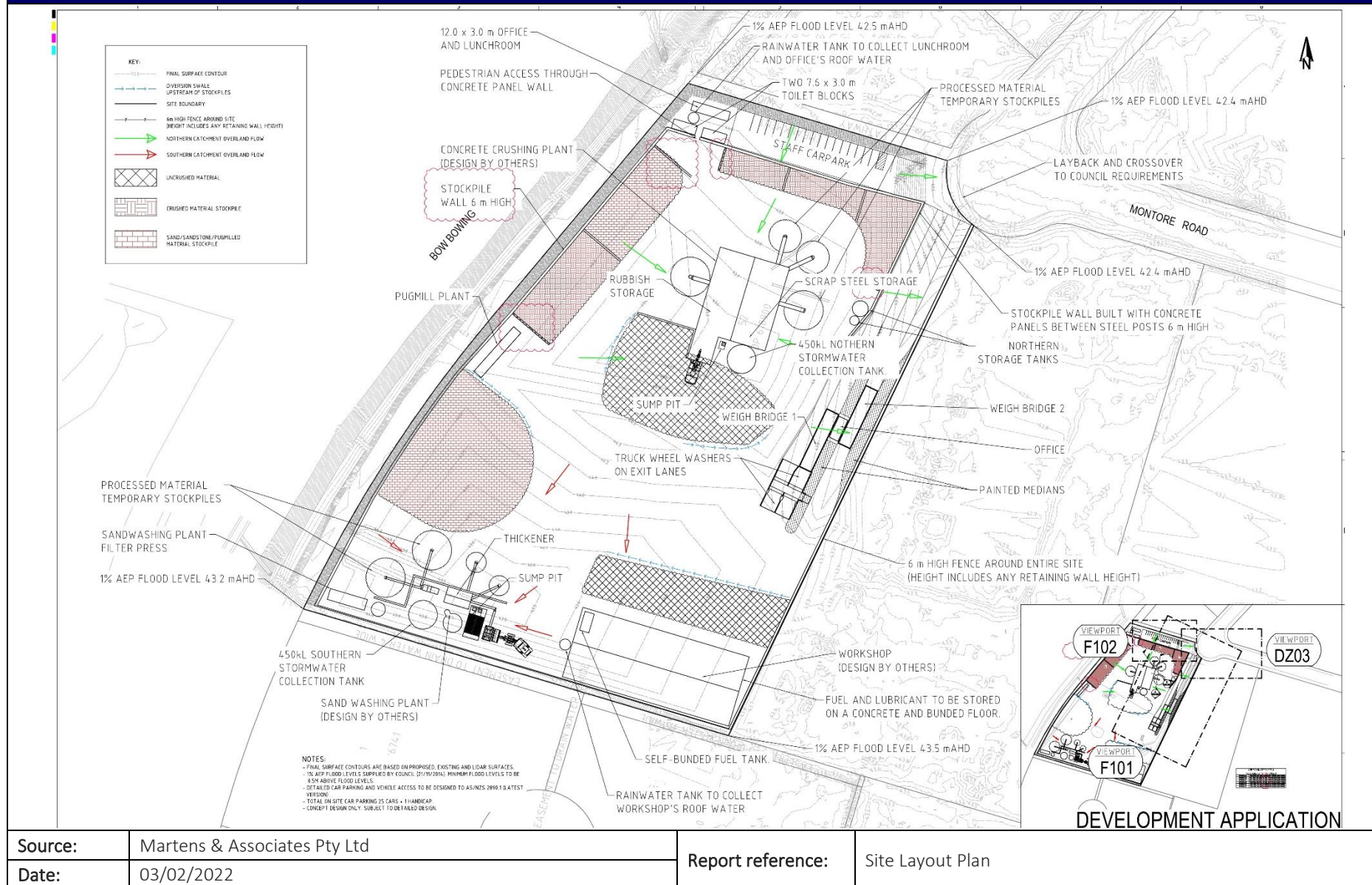


Figure 3: Site layout plan showing stockpile locations.

Site loading and unloading plan

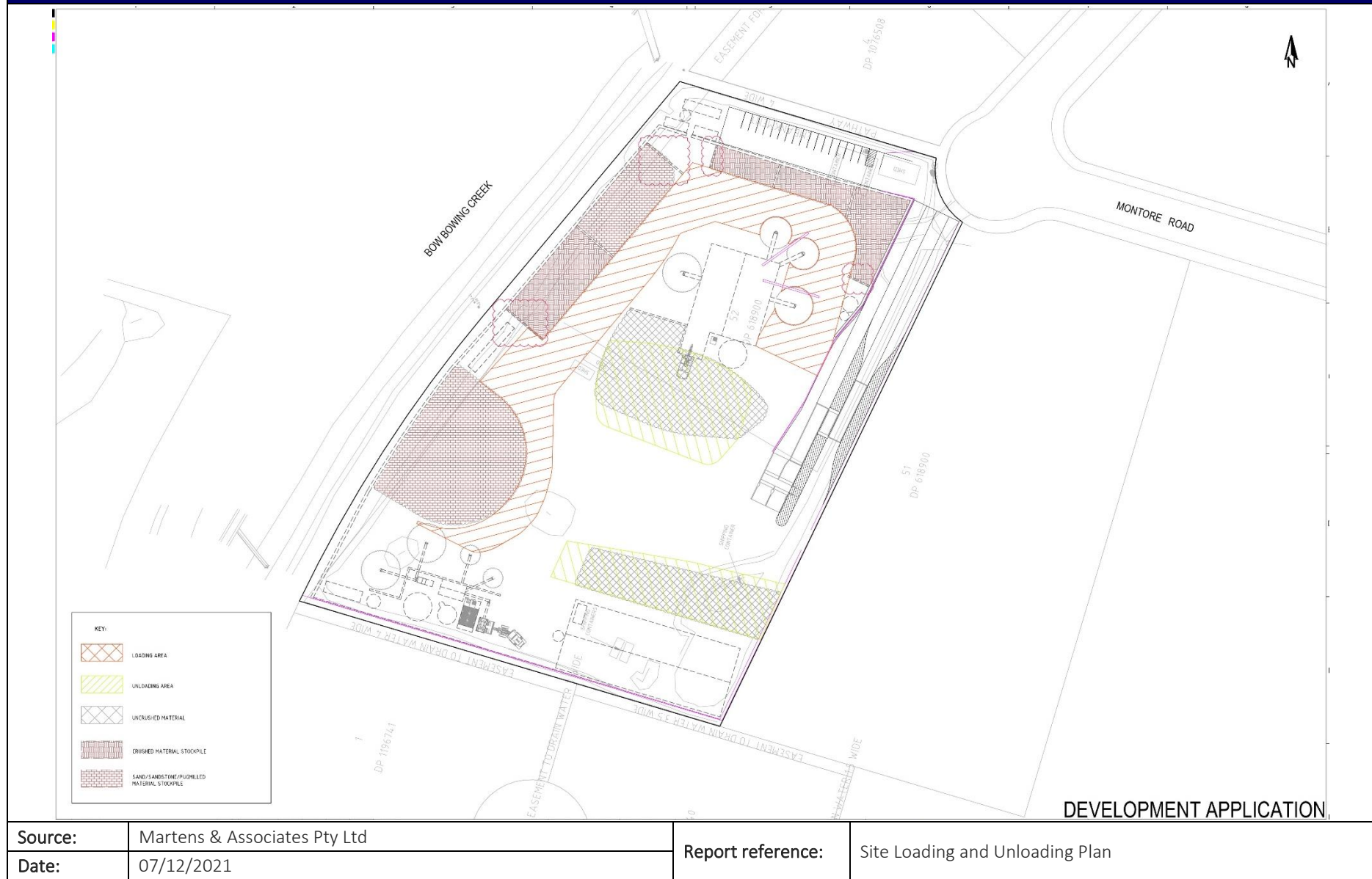


Figure 4: Site loading and unloading plan, showing location of stockpiles (crushed, uncrushed, processed) as well as loading and unloading areas.

Stockpile layout plan

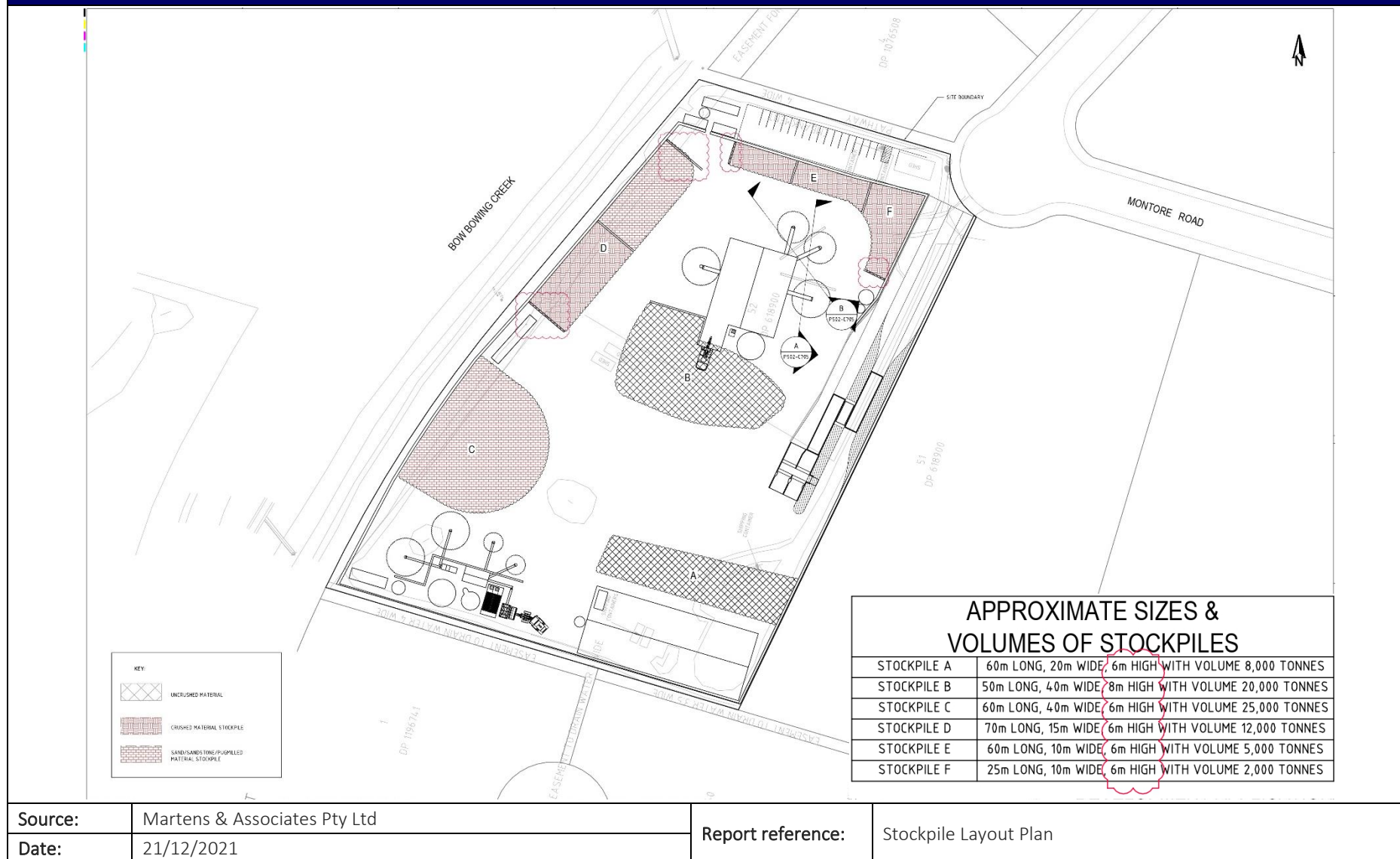


Figure 5: Stockpile layout plan, including the volumes of stockpiles.

Inspection points

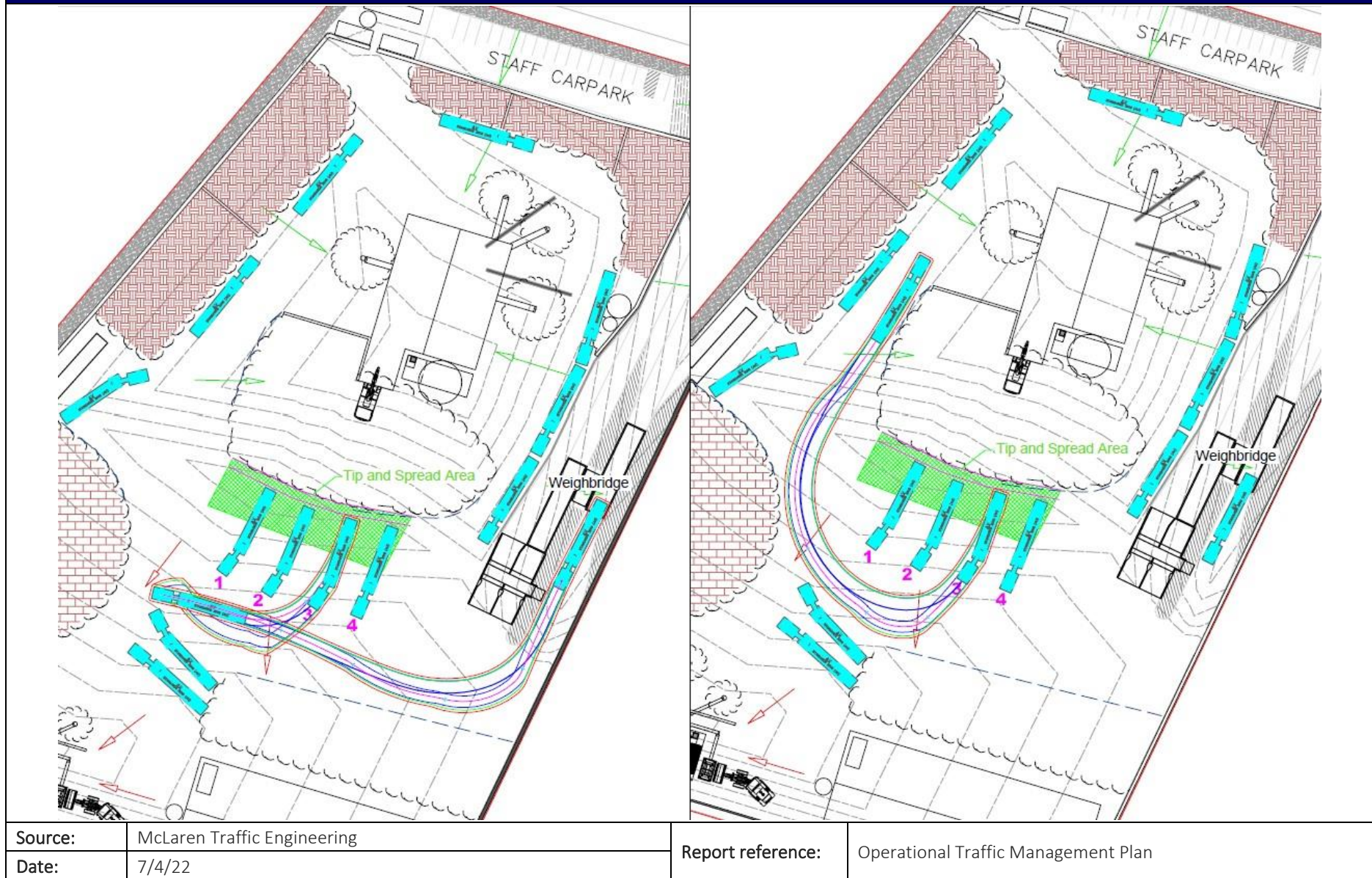


Figure 6: Tip and spread area, and other heavy vehicle movements.

Appendix 2 Waste quantity assumptions

The assumptions underpinning the waste quantity estimations in Table 3 are discussed below.

Food waste

FIAL's 2021 *National Food Waste Strategy Feasibility Study Final Report* (2021)¹ reported that each year Australians waste around 7.6 million tonnes of food across the food supply chain, or about 312 kg per person. Considering that the Site is operational for six days per week, it is appropriate to divide this figure accordingly. Assuming that only one third of food waste generated at work is relevant (waste associated with breakfast and dinner to be outside of scope), we would expect 89.1 kg of food waste per staff member per year. Allowing for 14 staff on site, this is a total of 1,248 kg per year, as presented in Table 5.

Table 5: Food waste assumptions.

Total waste per person annually (kg)	Per person for 6 days at work per week (kg)	Assuming 1/3 (lunch only) (kg)	Total waste for 14 staff annually (kg)
312	267.4	89.1	1,248

Timber

Fisher's Pallets suggest a weight of standard pine pallets between 27-35 kg per pallet² (i.e. 31 kg). Assuming an average delivery of one pallet per week, we would expect 1,612 kg of timber associated with pallets to be generated.

Paper/cardboard, plastics and glass

Minimal amounts of these materials are expected to be generated during the construction and operational phases of the development, generally associated with office and workshop sources. Likely sources include paper used for printing documentation (e.g. stockpile labelling, product information) and cardboard from deliveries. Plastics and glass will either be from beverages, or associated with deliveries (plastic wrapping, straps, packing support etc.). Some glass associated with damage to structures and vehicles may arise but is unexpected.

Paint and empty paint containers

Sourced from site marking and set-up during construction (directional traffic arrows, safety-coloured bollards etc.) and relatively minor touch-up works during operation. Considered minor, as they will be purchased as required, and paints used up where possible, rather than requiring disposal.

Green waste

Assuming 1250 m³ of green waste material requires removal (from Nearmap imagery), at a density of 0.2 t/m³, approximately 250 t of material total.

Construction and demolition waste

It is anticipated that the majority of the old concrete hardstand can be processed and re-used on the Site. Approximately 150 t of this material will not be suitable for re-use and will be sent to an appropriate resource recovery facility.

Steel and other metals

An allowance has been made during the construction phase for the removal and disposal of old fencing and other metal present on the Site. During operation, a large amount of generation of steel and other metal wastes is not expected, with this likely associated with plant and machinery part breakdowns and replacements.

Chemicals

Very minor generation of chemical wastes is expected, largely through the use of cleaning products and other aspects of plant and machinery maintenance.

¹ FIAL, 2021. The National Food Waste Strategy Feasibility Study – Final Report:

<https://workdrive.zohopublic.com.au/external/06152b9ff5971843391f39fc4d32a847e56fb907c167a4a645887b0a4bc43000>

² <https://fisherspallets.com.au/product-selection-guide/australian-standard-pine-pallets/>

Hydrocarbon waste (oils and fuels, including hydrocarbon contaminated water)

Some disposal of oils (hydraulic, engine etc.) from plant and machinery is anticipated. However, considering the service intervals and amount of machinery on the Site, this is expected to be minor. If surface water is contaminated by hydrocarbons and requires disposal, the amount of waste will increase above the estimates, however, considering the management practices to be implemented on the Site, this has not been accounted for.

E-waste

The amount of e-waste generated during operational phase of the development is anticipated to be minor, as this is associated with office-use, rather than the waste processing and management activities conducted on the Site.

Various hazardous wastes

As these wastes are not permitted on Site, it is expected that if any are present, they will be in very minor quantities. They have only been included in the table to identify suitable management approaches, should their presence occur.

Other, specialist wastes

As these wastes are unknown at this time, they cannot be quantified, and are considered minor.

Pest and Weed Management Plan

Concrete Recyclers
7 Montore Road, Minto, NSW

Management plan reference:

CR_PWMP

April 2024



Report Reference: CR_PWMP

Version: V1.0

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Acknowledgement of Country

Concrete Recyclers acknowledges the Traditional Owners of the land on which this site is located, the people of the Dharawal Nation. We acknowledge their continuing connection to land and sea Country, and we pay our respects to their Elders past, present and emerging.

Document Control

Version	Issue Date	Details	Author	Authorisation
0.0	22 Nov 2022	Draft PWMP document for OEMP.	Manikshya Shrestha James Hammond	Concrete Recyclers (Group) Pty Ltd
1.0	8 Apr 2024	Final PWMP document for OEMP	Manikshya Shrestha James Hammond	Concrete Recyclers (Group) Pty Ltd

1 Introduction

1.1 Background

4Pillars was engaged by Concrete Recyclers (Group) Pty Ltd to prepare a Pest and Weed Management Plan (PWMP) as part of the Operational Management Plan (OEMP) for a proposed Resource Recovery Facility at 7 Montore Road, Minto (the Site). This PWMP aims to ensure that Site operations comply with Condition B45 of the Development Consent (SSD-5339) as well as all relevant legislative obligations regarding controlling pests, vermin and declared priority weeds at the Site throughout the operational phase of the development.

1.2 Site Details

The Site details are summarised in Table 1 below. Please refer to Figure 1 for a map of the Site locality.

Table 1: Summary of Site details.

Item	Details
Local Government Area	Campbelltown City Council
Address	7 Montore Road, Minto, NSW
Lot(s)	Lot 52 DP 618900
Zoning	IN1 – General Industrial (Campbelltown LEP 2015)
Site size (total)	23,500 m ² (2.35 ha)
Previous land use	Various commercial and industrial activities including waste and equipment storage. Currently used for equipment storage by both Concrete Recyclers and Coates Hire.
Intended future land use	Resource Recovery Facility
Surrounding land uses	IN1 – General Industrial (Campbelltown LEP 2015) SP2 – Drainage (Campbelltown LEP 2015)
Elevation	Approximately 43 m AHD above sea level
Hydrology	The Site is located on the south bank of Bow Bowing Creek, within the Bow Bowing Bunbury Curran Creek catchment.

2 Legislative and Regulatory Framework

This management plan has been developed in accordance with all relevant Commonwealth and State legislation and best-practice guidelines. Relevant legislation, documents and guidelines which have been drawn upon in the formation of this report include:

- The Biosecurity Act 2015 (The Act);
- Local Land Services Act 2013;
- NSW Biodiversity Conservation Act 2016;
- Protection of the Environment Operations Act 1997 (POEO Act);
- Protection of the Environment Operations (General) Regulation 2009;
- Site Environmental Impact Statement (Nexus Environmental Planning Pty Ltd 2020);
- Site Flora and Fauna Survey (Aquila Ecological Surveys 2020);
- NSW Invasive Species Plan 2018-2021 (NSW DPI 2018);
- Weed Identification and Management webpage, Weeds Australia (URL: <https://weeds.org.au/identify/>) (Weeds Australia 2022); and
- Greater Sydney Regional Strategic Weed Management Plan 2017 – 2022.

3 Site History (Pest and Weed)

3.1 Weeds

The Site flora and fauna analysis carried out by Aquila Ecological Surveys (2020) identified a number of weeds present onsite prior to any development or control works. A list of these weeds and the legislation or guidelines they are identified under can be found in *Table 2*.

3.1.1 Priority Weeds

Under the Biosecurity Act 2015:

all plants are regulated with a general biosecurity duty to prevent, eliminate or minimise any biosecurity risk they may pose. Any person who deals with any plant, who knows (or ought to know) of any biosecurity risk, has a duty to ensure the risk is prevented, eliminated, or minimised, so far as is reasonably practicable.

Priority Weeds are listed under The Biosecurity Act 2015 and are required to be controlled by all landholders in an area. Priority weeds have the potential to cause harm to individuals, agricultural production or the wider community and must be controlled by all reasonable means. Priority weeds in Sydney are specified in the Greater Sydney Regional Strategic Weed Management Plan 2017 which divides the priority weeds into State Priority Weeds, Regional Priority Weeds and Other Regional Weeds of Regional Concern. The State and Regional Priority Weeds have specific control measures of individual species regardless of land ownership or location. Of the plant species recorded on Site, there are four priority weeds which fall into the State and Regional categories under the Greater Sydney Regional Strategic Weed Management Plan 2017, meaning that they must be continuously suppressed and destroyed.

3.1.2 Weeds of National Significance

Under the National Weeds Strategy, certain weeds are listed as Weeds of National Significance (WONS), due to their invasiveness, potential for spread and their detrimental economic and environmental impacts. Chilean Needle Grass, Cape Broom and Fireweed are all declared WONS. The weeds identified on the Site are shown in *Table 2* below.

Table 2: Weeds identified as being present on site. Highlighted weeds are either priority weeds in Greater Sydney or weeds of national significance. Source: Aquila Ecological Surveys (2020).

Scientific Name	Common Name	Weed Listing agency	Weed Categories
<i>Chloris gayana</i>	Rhodes Grass	A	2
<i>Eragrostis curvula</i>	African Love Grass	SWSWC	2
<i>Foeniculum vulgare</i>	Fennel	SWC, A	2
<i>Genista monspessulana</i>	Cape Broom	BA, S,	1
<i>Nassella neesiana</i>	Chilean Needle Grass	BA, S, SWSWC	2
<i>Olea africana</i>	African Olive	BA, SWC, SWSWC, A	1
<i>Pennisetum clandestinum</i>	Kikuyu	A	2
<i>Rubus ulmifolius</i>	Blackberry	SWSWC, A	1
<i>Senecio madagascariensis</i>	Fireweed	BA, S, SWC, A	2
<i>Verbena bonariensis</i>	Purple-top	A	2
BA = Declared priority weeds in Greater Sydney Area under the <i>Biosecurity Act 2015</i>			Weed categories
S = Weed of National Significance			1 Woody weeds
SWC = Sydney Weeds Committee			2 Grasses
SWSWC = South-West Sydney Weeds Committee			
A = listed by Association of Australian Bush Regenerators as weed (AABR, 2008)			

3.2 Pests and Vermin

The Site flora and fauna investigation (Aquila Ecological Surveys 2020) provided a list of fauna known to occur within the Site (see Table 3). As per the Local Land Services Act, landholders have an obligation to contribute to the control of declared pest species on their land. Out of all recorded fauna species, the Common Myna is the only species that is a declared pest species in NSW under the Biosecurity Act 2015 and subject to pest control.

Table 3: List of fauna species known to found on Site. Highlighted fauna is a declared pest in NSW. Source: Aquila Ecological Surveys (2020).

Scientific Name	Common Name
<i>Accipiter novaehollandiae</i>	Grey Goshawk
<i>Egretta novaehollandiae</i>	White-faced Heron
<i>Eolophus roseicapilla</i>	Galah
<i>Cacatua galerita</i>	Sulphur-crested Cockatoo
<i>Trichoglossus haematodus</i>	Rainbow Lorikeet
<i>Glossopsitta concinna</i>	Musk Lorikeet
<i>Malurus cyaneus</i>	Superb Fairy-wren
<i>Anthochaera carunculata</i>	Red Wattlebird
<i>Manorina melanocephala</i>	Noisy Miner
<i>Lichenostomus penicillatus</i>	White-plumed Honeyeater
<i>Rhipidura leucophrys</i>	Willie Wagtail
<i>Cracticus torquatus</i>	Grey Butcherbird
<i>Grallina cyanoleuca</i>	Australian Mudlark
<i>Corvus coronoides</i>	Australian Raven
<i>Sturnus tristis</i>	Common Myna
<i>Lamprophilus delicata</i>	Garden Skink

4 Pest and Weed Impact Assessment

4.1 Weeds

Potential impacts of the spread of invasive weed species include competition with native plants, loss of habitat for native animals, and subsequent loss of biodiversity. Specific impacts known to be associated with each of the four declared priority weed species previously present on Site are listed in Table 4. It is unlikely the Site will facilitate the spreading of weeds as a concrete or asphalt hardstand will cover the Site once the construction phase is completed. Therefore, it is expected that weeds will overall have a low impact on Site.

Table 4: Potential Impacts of Priority Weeds in Greater Sydney Area Identified within the Site.

Scientific Name	Common Name	Common Impacts
<i>Senecio madagascariensis</i>	Fireweed	- Invasive in agricultural pasture and disturbed land. - Poisons agricultural livestock.
<i>Olea africana</i> subsp. <i>cuspidata</i>	African Olive	- Invasive in native bushland. - Suppresses native plant species.
<i>Genista monspessulana</i>	Cape Broom	- Invasive in agricultural pasture. - Reduces native biodiversity.
<i>Nassella neesiana</i>	Chilean Needle Grass	- Invasive in agricultural pasture. - Reduces native biodiversity.

4.2 Pests and Vermin

Potential impacts of invasive pest species include human health and safety, erosion, loss of habitat for native flora and fauna and subsequent loss of biodiversity. Pest species that have the potential to occur on Site and specific impacts known to be associated with the species are listed in Table 5 below.

Table 5: Impacts of pest species with the potential to impact the Site.

Scientific Name	Common Name	Common Impacts
(<i>Sturnus tristis</i>)	Common Myna	• Damage agricultural crops. • Displacement of native birds and mammals.
(<i>Mus musculus</i>)	Mouse	• Disease transfer to livestock and humans. • Damage agricultural crops.
(<i>Rattus spp.</i>)	Rat	• Disease transfer to livestock and humans. • Damage agricultural crops.
(Blattodea spp. e.g., <i>Blattella germanica</i>)	Cockroach	• Disease transfer to livestock and humans.
(Culicidae spp. e.g., <i>Aedes spp.</i>)	Mosquito	• Disease transfer to livestock and humans.
(<i>Serpentes spp.</i>)	Snake	• Potentially venomous to humans and livestock.
(<i>Isoptera spp.</i>)	Termites	• Damage to buildings and other man-made structures.

5 Preventative Methods

The prevention and minimisation of the potential for pests and weeds to become established in the Concrete Recyclers Project Area, is a crucial to the ongoing management of pests and weeds. Vehicle, equipment, and machinery inspection and washdown will be the primary prevention measures to minimise the introduction and spread of pests and weeds within the Concrete Recyclers Project Area. These measures are described in *Table 6* below.

Table 6: Prevention and Minimisation Measures.

Preventive Measure	Activity/Description
Minimise land disturbance	• Avoid disturbances within the native vegetation planting area around the Site where possible.
Minimise access to food sources	• Appropriately dispose of food scraps and other general rubbish. • All general waste bins on Site must be covered at all times to minimise vertebrate fauna access to food scraps. • Educate personnel regarding the hazards of feeding vertebrate fauna.
Storage area maintenance	• Maintain materials in well-defined stockpiles.
Access (vehicle, equipment)	• Keep vehicles and equipment on public roads, designated access tracks or within approved extra work areas (e.g., designated vehicle turn-around areas). • Maintain access tracks to be free of weeds to avoid contamination of vehicles and machinery.
Washdown	• Vehicles and mobile plant must be cleaned at purpose built washdown facilities.

6 Monitoring and Records

6.1 Monitoring

The Site Manager or delegate will conduct a monthly inspection around the Site to identify the presence of any weed and pest species. The results of these inspections will be recorded and kept in a central location at the Site (e.g., the Site Office). If weed or pest species are identified on the Site, the appropriate control methods will be implemented at the discretion of the Site Manager. If a weed or pest species persists, a professional weed or pest control contractor may be engaged to help manage the problem.

6.2 Records

Both hard and electronic copies of records from all weed and pest control actions taken will be kept in a central location at the Site (e.g., the Site Office) for a minimum of five years to allow for a comprehensive review of the PWMP. The minimum of following details will be recorded:

- Date;
- Location of control action;
- Target species;
- Method utilised;
- Amount of herbicide/bait utilised;
- Area treated; and
- Numbers/area successfully controlled.

7 Control Methods

7.1 Weeds

7.1.1 Integrated Management Approach

An integrated management approach is ideal to use across broad areas that may be constrained by a number of environmental, safety or other concerns and where a single management option is insufficient to work effectively. Table 7 below describes several weed control methods and specifies the two applicable for Site weed management. The most appropriate control methods will be selected for individual outbreaks within the Site, in consultation with qualified, licensed, and experienced contractors where necessary.

Table 7: Weed management methods along with its appropriateness to Site. Light green represents weed management method appropriate to Site.

Control Method	Description	Appropriate for Site
Manual removal	Manual removal is an intensive, effective method of eradicating infestation in instances of isolated weed presence. The overall success of manual removal of weeds is based on the ability to remove any material that may result in regeneration of the species; this includes but is not limited to root systems, branches, leaves, seeds, and other reproductive material.	Recommended
Controlled burns	This method is implemented only in areas with significant infestation of specific weed species. It is not an appropriate method in urbanised areas where fire spreading is a high risk.	Not Applicable
Herbicide application	Herbicide is commonly used in conjunction with other control methods or repeat applications. Any spraying should be done during calm days to avoid wind blowing herbicide into native vegetation. Cut and paint or stem injection is appropriate for woody weed species. Herbicides should only be used as directed by the product label and manufacturer directions. Training or qualifications may be required for personnel applying the herbicide.	Recommended

7.2 Pests and Vermin

Table 8 below shows several pest management methods along with their description and appropriateness for use on the Site. As above, the most appropriate control methods will be selected on a case-by-case basis, depending on the pest and the magnitude of the problem. Qualified pest controllers may be contracted for pest management at the discretion of the Site Manager.

Table 8: Pest and vermin management methods and appropriateness for Site. Light green represents pest and vermin management method appropriate to Site.

Method	Description	Appropriate for Site
Baiting	Baiting is a cost effective and proven management control for pest species. Pest baiting requires knowledge of the target species so that appropriate deployment and bait are utilised. The use of baits has the potential to impact non-targeted species. A contractor may be engaged by the Site Manager where more extensive baiting is required.	Recommended
Trapping	Trapping for small animals such as rats and mice provides management and is low in cost and labour intensity. Trapping should be used in conjunction with the preventative measures listed in Section 5 to help control pest numbers.	Recommended
Shooting	Shooting of pests is a control method usually used for larger pest species in agricultural areas. It is not an appropriate method for controlling the smaller pest species most likely to impact the Site in a more urban area.	Not Applicable

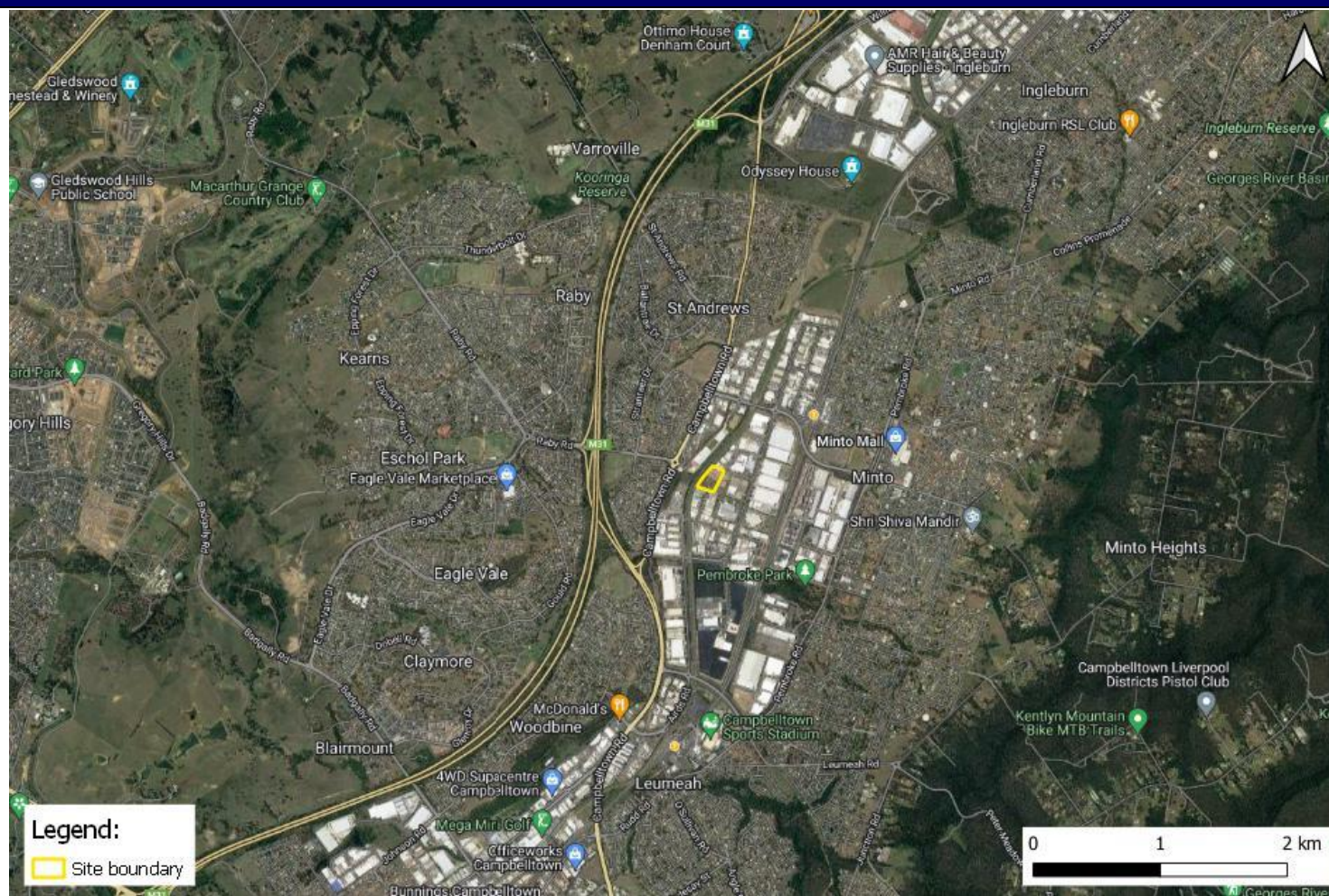
8 Review

An annual review of the PWMP and records will be undertaken by the Site Manager or delegate to ensure the current presence of pest and weed species and their abundance within the Site are accurately reflected in the PWMP. Any significant findings from the review - such as new pest or weeds species, new outbreaks or the efficacy of control methods used - will inform the management methods recommended in the revised PWMP.

9 Appendix List

Appendix 1 Figures and Maps

Site locality



Drawn by:	KP	Report reference:	CR_PWMP	Key	Refer to map legend.
Date:	6/7/22	Image source:	QGIS with Six Map overlay		

Figure 1: Site locality.

Chemical Storage Management Plan

Concrete Recyclers

7 Montore Road, Minto, NSW

Management plan reference:

CR_CSMP

August 2024



Report Reference: CR_CSMP

Version: V1.1

Published: 27 August 2024

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Document Control

Version	Issue Date	Details	Author	Authorisation
0.0	7 Oct 2022	Draft CSMP document for OEMP.	Kay Porter James Hammond	Concrete Recyclers (Group) Pty Ltd
1.0	8 Apr 2024	Final CSMP document for OEMP	Kay Porter James Hammond	Concrete Recyclers (Group) Pty Ltd
1.1	27 Aug 2024	Revising Site layout to current plan	Kay Porter James Hammond	Concrete Recyclers (Group) Pty Ltd

1 Introduction

4Pillars has prepared this Chemical Storage Management Plan (CSMP) on behalf of Concrete Recyclers (Group) Pty Ltd as part of an Operational Environmental Management Plan (OEMP) for a Resource Recovery Facility at 7 Montore Road, Minto (the Site). The preparation of this CSMP is consistent with Conditions C1, B48, B49 and B50 of the State Significant Development Consent (SSD-5339).

1.1 Site Details

The Site details are summarised in Table 1 below. Please refer to Figure 1 for a map of the Site locality.

Table 1: Summary of Site details.

Item	Details
Local Government Area	Campbelltown City Council
Address	7 Montore Road, Minto, NSW
Lot(s)	Lot 52 DP 618900
Zoning	IN1 – General Industrial (Campbelltown LEP 2015)
Site size (total)	23,500 m ² (2.35 ha)
Previous land use	Various commercial/industrial activities including waste and equipment storage. See Figure 2 for recent satellite imagery of the Site.
Intended future land use	Resource Recovery Facility
Surrounding land uses	IN1 – General Industrial (Campbelltown LEP 2015) SP2 – Drainage (Campbelltown LEP 2015)
Elevation	Approximately 43 m AHD above sea level
Hydrology	The Site is located on the south bank of Bow Bowing Creek, within the Bow Bowing Bunbury Curran (BBBC) Creek catchment.
Geology	Preliminary Site Investigation determined a layer of fill material (up to 1 m depth) is present on the Site. The natural materials underlying the Site are expected to be primarily clay, shale and laminate.

2 Application

Conditions B48, B49 and B50 of the Development Consent relate to the storage of chemicals on Site:

B48. The Applicant must store all chemicals, fuels and oils used on-site in accordance with:

- the requirements of all relevant Australian Standards; and
- the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual' if the chemicals are liquids.

B49. The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.

B50. 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).

This plan has been developed in accordance with the above conditions along with relevant legislation and best-practice guidelines including:

- Relevant SafeWork NSW Codes of Practice;
- Australian Code for the Transport of Dangerous Goods by Road & Rail;
- NSW EPA's "Storing and Handling of Liquids: Environmental Protection – Participants Manual".

The objectives of this CSMP are to ensure that:

- Hazardous chemicals are stored safely on Site;
- The risk of chemical spills or leaks is minimised; and
- Any chemical spills that occur are managed effectively to minimise harm.

3 Site Context

Hazardous chemicals that will be stored on Site include fuels, lubricants, oils, paints, solvents, as well as industrial and domestic cleaners. These chemicals have the potential to cause harm to human health (through direct contact with the chemical, inhalation of fumes, or potential combustion of flammable materials), Site properties (corrosion, oil slick) and environment (contamination of land or surface water). Inside the Site Workshop (refer to Figure 3), diesel fuel will be stored in a self-bunded fuel tank, liquid chemicals will be stored in a bunded chemical storage container, and gases will be stored in a gas cylinder storage area.

4 Controls and Response

Hazardous chemicals will be stored in an undercover, bunded area within the Site Workshop in accordance with the NSW EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Manual*. Small quantities of domestic cleaning products used for the office and toilet areas are not considered a hazard to personnel or the environment and may be stored outside of designated chemical storage areas. The quantity of domestic liquid cleaning products stored on site at any time would be no more than 10 litres.

The identification, handling, storage and disposal of each chemical will be guided by their respective Safety Data Sheets (SDS), which will be made accessible in the Site Workshop near the hazardous chemical storage areas. Any personnel handling hazardous chemicals must adhere to all safety disclaimers and instructions detailed on the SDSs provided.

A register of all chemicals and their associated SDS will also be kept in the Site Office and made readily available for all personnel with potential exposure to any such substances. This register will be revised annually, or whenever new chemicals are introduced for use or storage on Site.

Ensuring quality housekeeping through the storage of hazardous chemicals in a bunded area, maintenance and proper use of spill kits, regular inspections and staff training will also reduce the likelihood of harm to human health and the environment.

Safety equipment and devices used to minimise risks to human and environmental health, and to contain or control a spill include first aid kits, spill kits and bunds, traffic control cones, barriers, signage and PPE (e.g., gloves, respiratory protection etc., as required). Safety equipment will be located in the Site Workshop, with Site vehicles also equipped with additional emergency response equipment and materials. Regular inspections will be scheduled for these items, which will be serviced and maintained in accordance with the relevant standards and manufacturer's instructions. Regular training should also be carried out to ensure that all employees can effectively operate the equipment.

In the event of a chemical spill, the following immediate response actions should be followed (consistent with the Emergency Response Plan):

1. Isolate/shut off the source of the chemical if possible.
2. All personnel are to leave the area if it is an enclosed space, and the chemical is likely to produce a hazardous vapour.
3. Lay down spill control products or use mobile plant to create an earth bund to contain the spill (with priority given to preventing off-site escape of the spill).
4. Use appropriate spill kit products where necessary.
5. Consult the SDS for information on human and environmental toxicity and take appropriate actions, as directed by the Project Manager.

5 Inventory of Chemicals

An inventory of chemicals to be stored on Site, including the locations and maximum quantities of these chemicals is shown in Table 2.

Table 2: Inventory of chemicals to be stored on Site, including their maximum volumes and storage locations.

Chemical	Description	Location	Maximum Quantity
210 Metal Primer	Structural steel anticorrosive primer	Bunded chemical storage container in Workshop	40 L
260 Keycoat Etch Primer	Paint primer	Bunded chemical storage container in Workshop	40 L
300 Rapid Dry Enamel	Topcoat pain	Bunded chemical storage container in Workshop	8L
390 Equipment Enamel	Topcoat paint	Bunded chemical storage container in Workshop	120 L
480 Premium Enamel	Topcoat paint	Bunded chemical storage container in Workshop	8L
720 Isocyanate free 2 Pack Part A	2K Iso-free Part A Base	Bunded chemical storage container in Workshop	40 L
720 Isocyanate free 2 Pack Hardener Part B	2K Iso-free Part B Hardener	Bunded chemical storage container in Workshop	40 L
724 Iso Free High Build 2 Pack Primer	2K Iso-free Primer Part A Base	Bunded chemical storage container in Workshop	40 L
724 Iso Free High Build 2K Hardener	2K Iso-free Part B Hardener	Bunded chemical storage container in Workshop	40 L
Acetylene (dissolved)	Fuel gas for industrial applications	Bunded chemical storage container in Workshop	290 L
Armor Kote	Cleaner and protector of vinyl surfaces	Bunded chemical storage container in Workshop	40 L
Beltgrip (aerosol)	Tackifier	Bunded chemical storage container in Workshop	2 kg
Brake Cleaner	Brakes and parts cleaner	Bunded chemical storage container in Workshop	40 L
CAT Cooling System Cleaner	Cleaning solutions for industrial applications	Bunded chemical storage container in Workshop	20 L
Coregas 18	Welding gas for industrial applications	Gas cylinder storage in Workshop	300 L
DD 50 Coolant Red	Glycol based engine cooling system treatment	Bunded chemical storage container in Workshop	40 L
Dulux Duramax Metal Primer	Aerosol spray pack paint for general small project painting	Plant parts storage in Workshop	1 kg
Fleetmaster CK-4 Extreme 15W/40	Heavy-duty engine oil for use in diesel 4 stroke engines with DPF	Bunded chemical storage container in Workshop	200 L
Gear Oil 75W90 GL-5	Mineral oil based automotive gear oil	Bunded chemical storage container in Workshop	200 L

Chemical	Description	Location	Maximum Quantity
Gear Oil 80W90 GL-5	Mineral oil based automotive gear oil	Bunded chemical storage container in Workshop	200 L
Gear Oil 85W140 GL-5	Mineral oil based automotive gear oil	Bunded chemical storage container in Workshop	200 L
Goss Chem-i-Weld	Repairs cracks in automotive cylinder heads and blocks	Bunded chemical storage container in Workshop	1 L
Heavy Duty Degreaser	Industrial solvent	Bunded chemical storage container in Workshop	40 L
Hi-Tec Glass Cleaner	Glass and window cleaner	Bunded chemical storage container in Workshop	2 L
Hydraulic 32	Mineral oil based hydraulic fluid	Bunded chemical storage container in Workshop	200 L
Hydraulic 68	Mineral oil based hydraulic fluid	Bunded chemical storage container in Workshop	200 L
Hydraulic XHVI 46 (Natural)	Mineral oil based very high viscosity index hydraulic fluid	Bunded chemical storage container in Workshop	40 L
Intec Industrial Gear Oil ISO 150	Industrial gear oil	Bunded chemical storage container in Workshop	60 L
Jaques Bac – Part A	Liquid epoxy grout used for grouting machinery, backing crusher parts	Bunded chemical storage container in Workshop	200 kg
Jaques Bac – Part B	Liquid epoxy grout used for grouting machinery, backing crusher parts	Bunded chemical storage container in Workshop	25 kg
Lith EP-00 Grease	Lithium soap based multipurpose grease	Bunded chemical storage container in Workshop	60 kg
Mobilect 44	Discharge/insulating material	Bunded chemical storage container in Workshop	182 kg
Machine Oil 220	Mineral oil based industrial machine oil	Bunded chemical storage container in Workshop	900 L
NF Contact Cleaner	Cleaning agent	Plant parts storage in Workshop	2 kg
Oxygen, compressed	Calibration gas for industrial applications	Gas cylinder storage in Workshop	192 L
Prolithtac	General purpose grease for automotive and industrial applications	Bunded chemical storage container in Workshop	40 kg
R29 Premium Copper Anti-Seize	Industrial anti-seize compound	Plant parts storage in Workshop	1 kg
Radiator Treatment	Corrosion inhibitor for the cooling systems of engines	Bunded chemical storage container in Workshop	100 L
Silastic 732	Adhesive/binding agents	Plant parts storage in Workshop	2 kg
Soluble Cutting Fluid	Mineral oil-based metal forming fluid	Bunded chemical storage container in Workshop	40 L

Chemical	Description	Location	Maximum Quantity
Super Scruba Hand Cleaner	Water based hand cleaner	Bunded chemical storage container in Workshop	40 L
Tip Top Cement SC 2000	Adhesive	Bunded chemical storage container in Workshop	2 kg
Trans SAE 30	Transmission Fluid	Bunded chemical storage container in Workshop	200 L
Trans SAE 50	Transmission fluid	Bunded chemical storage container in Workshop	200 L
VXP-2 Grease	Lithium Complex based multipurpose grease	Bunded chemical storage container in Workshop	90 kg
Water Based Degreaser	Water based cleaner/degreaser	Bunded chemical storage container in Workshop	100 L
WD-40 Aerosol	Lubricant/penetrant/drives out moisture	Plant parts storage in Workshop	1 L
WD-40 Specialist High Performance White Lithium Grease	Cleaner/lubricant	Plant parts storage in Workshop	3 L
Window cleaner	Water based window cleaner	Bunded chemical storage container in Workshop	40 L
Automotive Diesel Fuel	Fuel	Self-bunded diesel fuel tank	30, 000 L

6 Closing Statement

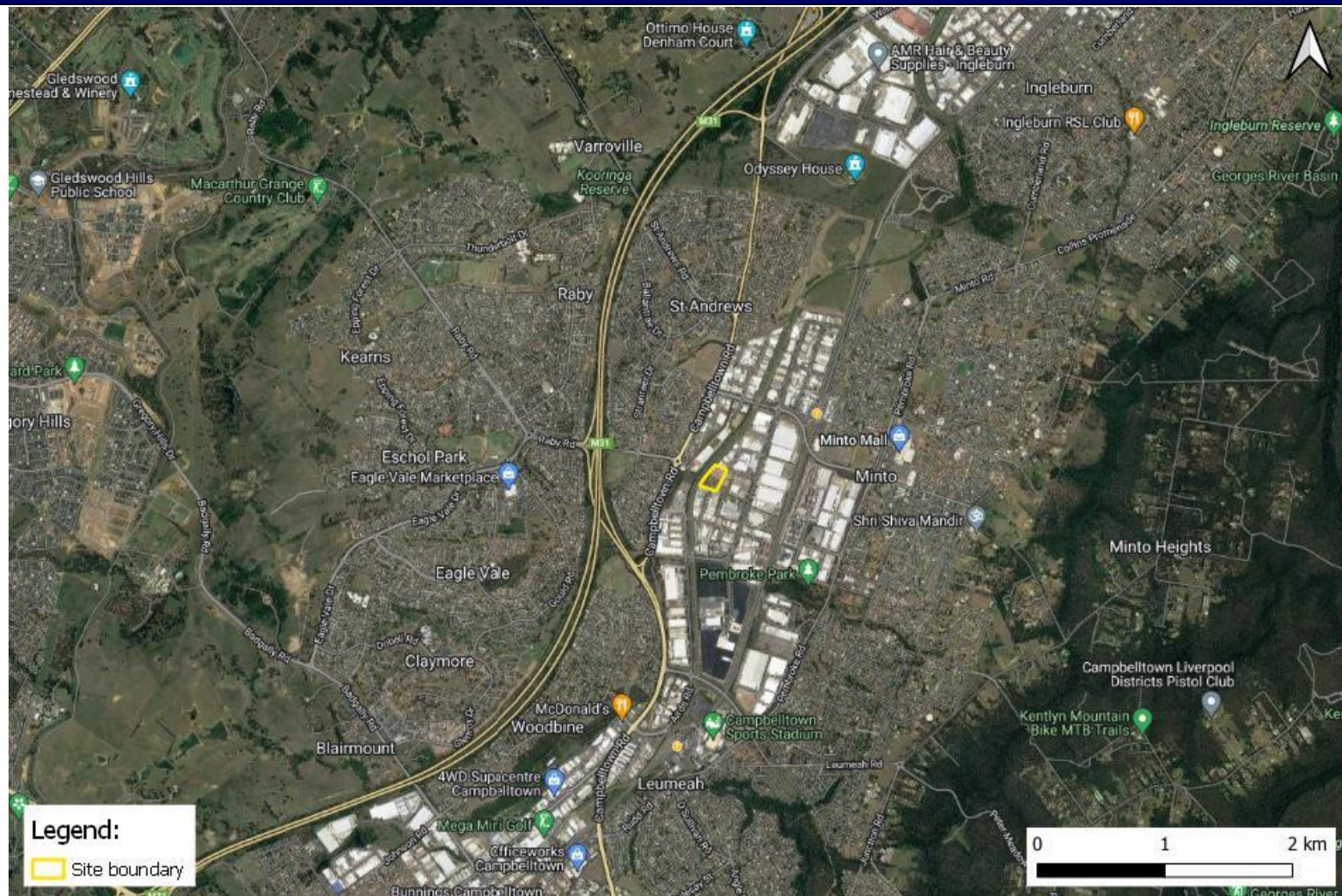
We note that this CSMP has been prepared during the construction phase of this project and will need to be reviewed and updated once the operation phase of the development commences. This CSMP will also be reviewed annually, in order to remain up to date with changes to Site conditions or regulatory requirements.

7 Appendix List

Appendix 1 Figures and Maps

Appendix 1 Figures and Maps

Site locality



Drawn by:	KP	Report reference:	20220325CON_CSMP	Key:	Refer to map legend.
Date:	25/7/22	Image source:	QGIS and Six Map overlay		

Figure 1: Site locality.

Aerial view of the Site (pre-development)



Drawn by:	KP	Report reference:	CR_CSMP	Key:	Refer to map legend.
Date:	6/7/22	Image source:	QGIS with Nearmap overlay (dated 15/6/22)		

Figure 2: Site boundary and aerial view.

Site layout

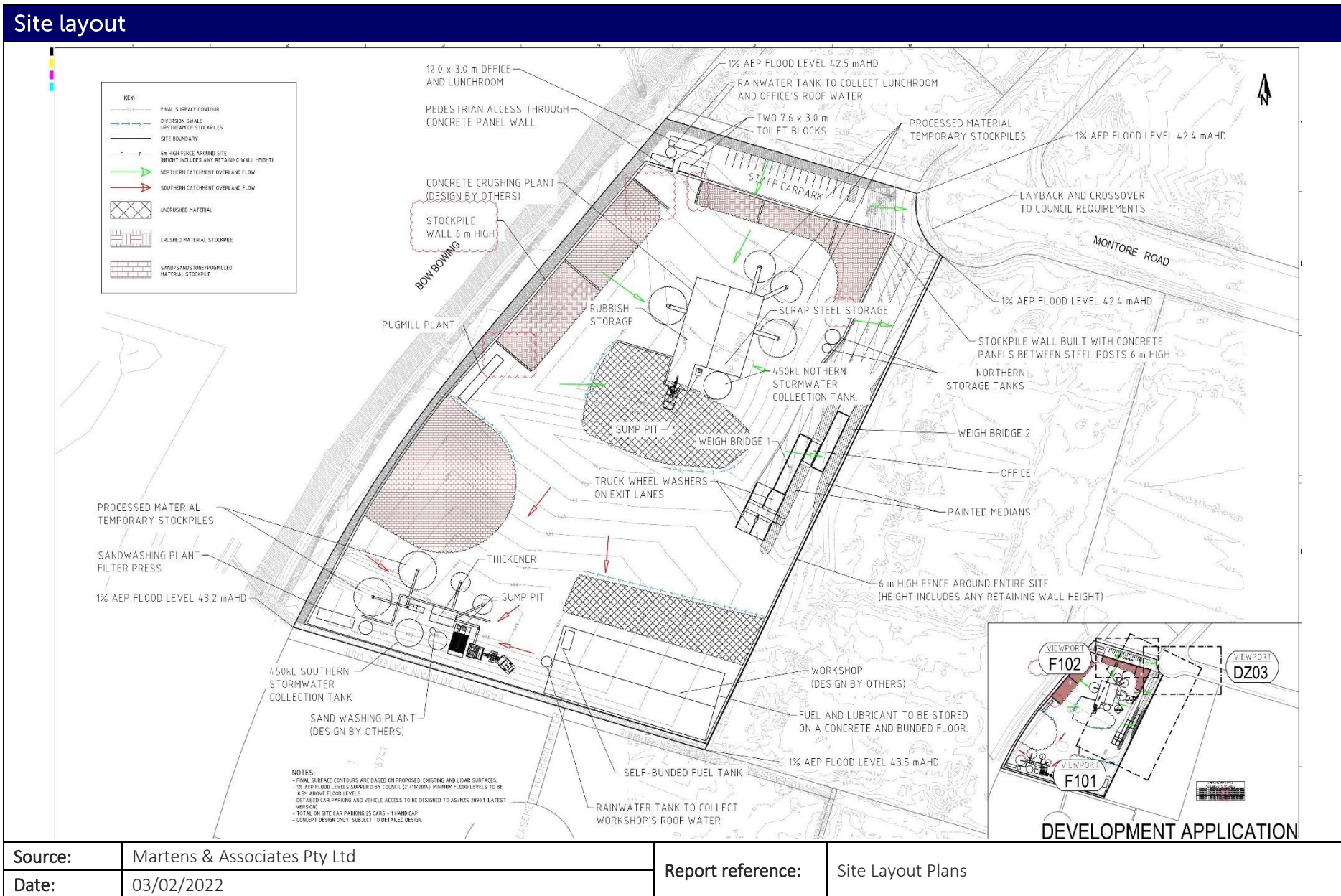


Figure 3: Site layout plan.

Landscape Management Plan

Concrete Recyclers
7 Montore Road, Minto, NSW

Management plan reference:

CR_LMP

August 2024



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Prepared for:

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Acknowledgement of Country

Concrete Recyclers acknowledges the Traditional Owners of the land on which this site is located, the people of the Dharawal Nation. We acknowledge their continuing connection to land and sea Country, and we pay our respects to their Elders past, present and emerging.

Document Control

Version	Issue Date	Details	Author	Authorisation
0.0	17 Nov 2022	Draft LMP document for OEMP.	Manikshya Shrestha James Hammond	Concrete Recyclers (Group) Pty Ltd
1.0	8 Apr 2024	Final LMP document for OEMP	Manikshya Shrestha James Hammond	Concrete Recyclers (Group) Pty Ltd
1.1	27 Aug 2024	Revised based on Department's comments: updating site layout to current approved plan, revising landscape drawings (incl. adding dimensions).	Rhys Thompson	Concrete Recyclers (Group) Pty Ltd

1 Introduction

1.1 Background

4Pillars Environmental Consulting Pty Ltd (4Pillars) was engaged by Concrete Recyclers (Group) Pty Ltd to prepare a Landscape Management Plan (LMP) as part of the Operational Management Plan (OEMP) for a proposed Resource Recovery Facility at 7 Montore Road, Minto (the Site). The preparation of a LMP is a requirement of Condition C6 of the Development Consent (SSD-5339) for the Site.

Concrete Recyclers (Group) Pty Ltd intends to develop the Site into a Resource Recovery Facility that can accept up to 450,000 tonnes per annum of Building and Demolition waste. The development will involve earthworks and construction of Site buildings and structures (refer to the Site plan in Figure 2). The Site covers approximately 23,500 m² (2.35ha) and is located south-west of Montore Road, 240 metres west of its intersection with Airds Road. Surrounding land use consists of already developed industrial blocks of a similar size. The Site has been cleared for some time and at the time of Environmental Impact Statement (EIS) survey, it was being used as a depot for both Concrete Recyclers Coates Hire. The Site drains to Bow Bowing Creek, a tributary of the Georges River. Adjacent to the Site and for some distance up and downstream Bow Bowing Creek has been “formalised” into a concrete channel.

1.2 Site Details

The Site details are summarised in Table 1 below. Please refer to Figure 1 for a map of the Site locality.

Table 1: Summary of Site details.

Item	Details
Local Government Area	Campbelltown City Council
Address	7 Montore Road, Minto, NSW
Lot(s)	Lot 52 DP 618900
Zoning	IN1 – General Industrial (Campbelltown LEP 2015)
Site size (total)	23,500 m ² (2.35 ha)
Previous land use	Various commercial and industrial activities including waste and equipment storage. Currently used for equipment storage by both Concrete Recyclers and Coates Hire.
Intended future land use	Resource Recovery Facility
Surrounding land uses	IN1 – General Industrial (Campbelltown LEP 2015) SP2 – Drainage (Campbelltown LEP 2015)
Elevation	Approximately 43 m AHD above sea level
Hydrology	The Site is located on the south bank of Bow Bowing Creek, within the Bow Bowing Bunbury Curran Creek catchment.

2 The Management Area

2.1 Location and Character of the Area

The Site (52 of DP618900) is located within the Campbelltown City Council Local Government Area and within land zoned IN1: General Industrial according to the Campbelltown Local Environmental Planning 2015. The Site covers a total area of approximately 23,500 m².

The following landscape features are located within the immediate vicinity of the Site:

- Industrial and warehouse development with frontage to Montore Road;
- Bow Bowing Creek adjoining the Site to the west;
- Industrial development to the west of Bow Bowing Creek; and

- Residential development to the west of the above-mentioned industrial development and on the western side of Campbelltown Road.

2.2 Geology and Soils

The Wollongong 1:100,000 Geological Series sheet indicates that the natural soil profile of the Site is underlain by quaternary deposits of quartz and lithic "fluvial" sand, silt, and clay. The Wollongong 1:100 000 Soil Landscapes sheet indicates Site soils are of the Blacktown soil landscape comprising earthy sands in valley flats.

2.3 Climate

The climate data below was obtained from the nearest BOM station Campbelltown (Kentlyn (Georges River Road)) station 068160. Table 2 shows the statistics rainfall data from the year 1966 to 2022. The area generally experiences warm to hot summers and cool winters. A mean maximum temperature between 27°C and 30°C is experienced between December and February and a mean minimum of between 16.3°C and 17.4°C during the months of June, July, and August. Autumn and spring are generally mild. The driest months are July, August, and September with mean monthly rainfall of 44.1mm, 40.6mm and 37.7mm respectively. The highest average rainfalls are in January, February and March, the figure being 78.7mm, 93.2mm and 114.3mm, respectively.

Table 2: Statistics rainfall data from the year 1966 to 2022.

Statistic	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Mean	78.7	93.2	114.3	65.3	53.1	75.3	44.1	40.6	37.7	58.6	75.0	56.0	764.9
Lowest	3.0	9.6	19.2	3.0	2.6	3.0	0.3	0.4	0.0	0.5	0.0	0.2	408.8
5th Percentile	14.4	15.2	30.6	7.6	5.3	4.9	1.0	4.9	1.0	1.1	9.0	3.2	436.5
10th Percentile	23.2	16.1	31.9	7.8	10.1	8.0	5.3	5.0	5.2	5.1	18.0	7.9	461.7
Median	59.3	76.5	79.7	42.5	34.0	64.2	24.0	20.0	34.3	49.5	65.3	49.4	753.0
90th Percentile	162.9	195.0	234.8	165.4	117.2	155.4	73.6	108.3	69.2	138.7	154.0	106.8	1074.7
95th Percentile	197.2	201.8	327.6	182.8	125.1	231.1	120.3	178.8	89.0	160.5	170.0	129.5	1152.7
Highest	218.0	326.0	546.0	368.8	228.0	358.0	476.0	215.0	133.8	183.3	243.6	198.3	1283.2

2.4 Existing Flora

The Site flora and fauna analysis carried out by Aquila Ecological Surveys (2020) identified a number of flora species present on Site prior to any development or control works. No threatened flora species were detected during the survey as per Biodiversity Conservation Act (BC Act 2016) and Environmental Protection and Biodiversity Act (EPBC Act 1999). Vegetation at the Site is heavily modified composed of planted trees and introduced grasses and shrubs that have colonised the underlying sandstone material that was deposited by the Roads and Traffic Authority some years ago. The vegetation does not conform to any Endangered Ecological Community listed on the BC Act or the EPBC Act and has no conservation significance. The Site has been cleared for some time and the northern third of it has been levelled and occupied by offices and plant of Coates Hire.

Out of the species identified on Site, the following were recorded as priority weeds in Greater Sydney Area:

- African Olive (*Olea europaea subsp cuspidata*)
- Chilean Needle Grass (*Nassella neesiana*)
- Cape Broom (*Genista monspessulana*)
- Fireweed (*Senecio madagascariensis*).

3 Landscape and Vegetation Management Plan

The landscape and vegetation works of the development will be implemented in accordance with the Landscape Plans developed by Conzept Landscape Architects in 2020 and minor revisions made in 2024 (see Appendix 2). Methods for the landscaping and vegetation works are detailed in the sections below.

3.1 Plant Species

The vegetation species chosen will be selected from the native tree and grasses species listed in the Landscape Management Plan (Appendix report which are summarised in the Table 3 below.

Table 3: List of some vegetation species for landscape works.

Plant Type	Species	Common Name	Estimated height at maturity (metre)	Total Number Required
Trees	<i>Banksia integrifolia</i>	Coastal Banksia	6-8	13
	<i>Ceratopetalum gummiferum</i>	NSW Christmas Bush	5-8	18
	<i>Elaeocarpus reticulatus</i>	Blueberry Ash	8-10	10
	<i>Melaleuca decora</i>	White Feather Honey Myrtle	7	18
Groundcover	<i>Daniella prunina</i>	Native Flax	0.5-0.9	6 per m ² (total area 868.9 m ²)
	<i>Hardenbergia violacea</i>	Purple Twining-Pea	0.5	
	<i>Lomandra longifolia</i>	Many flowered Mat-Rush	0.5	

3.2 Sourcing

All plants species required for the vegetation should be sourced from local nurseries and garden centres where possible. In the case of required species being unavailable, nurseries from other areas will be used. The quality of plant stock shall be approved by either Project Manager or Landscape Architect.

3.3 Installation of Plants

The vegetation plan will take place along the western bund wall and the northern boundary of the Site. The bund walls will be constructed as per the engineers' staging plans and details. These bund walls will be stabilised with jute matting and pocket planted with endemic tube stocks including medium tress and grasses as per the Landscape Plans designed by Conzept Landscape Architects (Appendix 2).

The planting species will consist of a combination of tree species and grasses species to maximise vegetation density and coverage. Use of a range of planting species is preferred to increase the biodiversity of the vegetated area. It is recommended that vegetation planting is implemented according to the concept vegetation plan shown in Appendix 2. The Landscape Contactor shall locate and avoid Site storm water and drainage structures and shall locate trees at least 1.25 m from the pits.

Water crystals or other wetting agents will also be added to each plant hole in accordance with the manufacturer's directions. This will increase the water holding capacity of the soil and reduce the watering schedule required. All plants

will be 'watered in' on the day of installation. Further irrigation will be completed where necessary during monitoring (up to 12 months after initial installation) factoring in recent and forecast weather and rainfall events.

Tree guards will be installed around each plant to protect the young plants from extreme weather, herbivorous grazing, and potential herbicide drift during weed maintenance. If available, bio-degradable tree guards are preferred over plastic guards. The plants will also be staked to encourage upward growth and assist root development. To secure the lower trunk to stakes, 50mm hessian ties will be used. Tree guards and stakes are to be removed once plants are sufficiently established.

It is recommended forest blend mulch is spread throughout the planted area to a thickness of approximately 75mm. This will assist with weed control and soil moisture retention. This will be applied once the installation of all plants is complete.

3.4 Maintenance

After the completion of the rehabilitation works, the vegetated areas shall be subjected to a minimum landscape works period of about 12 months. The Landscape Contractor shall be responsible for the establishment of all planting until completed. Access to the Site will be restricted to the designated access roads. Vehicles will be prohibited from landscaped areas once they have been planted. The following maintenance activities are recommended in the Concept Landscape Architect Landscape Plans and will be undertaken:

- Seedlings shall be watered thoroughly after following initial works. Watering will then be scheduled for a minimum of three times per week during winter, and four times per week during summer, until plants are sufficiently established. Watering shall be done by hand, utilising the storm water captured on Site where appropriate;
- Rehabilitation areas shall be monitored continuously until well established;
- Weed removal shall be conducted regularly, with hand removal of all top growth roots, and stolons of unwanted vegetation;
- Herbicide application to the weed removal shall occur during calm days to avoid winds blowing herbicides onto native planting;
- Landscape Contractor shall constantly monitor the pest and vermin damage or infestations and if necessary, control measures shall be applied immediately and
- In case of rabbit tuck, rabbit-proof fencing shall be installed to the rehabilitation area to ensure minimum damage.

The following maintenance efforts are also recommended to be carried out to ensure long-term success of the revegetated area:

- Constant monitoring of the revegetated area (ensuring each plant is in good condition, tree guards and stakes are present, weeds are absent etc.) for the first month after the initial planting;
- Photo monitoring in the first 12 months is also recommended to highlight and monitor changes in the vegetation through time; and
- Any issues identified within the weekly inspections will be addressed.

4 Closing Statement

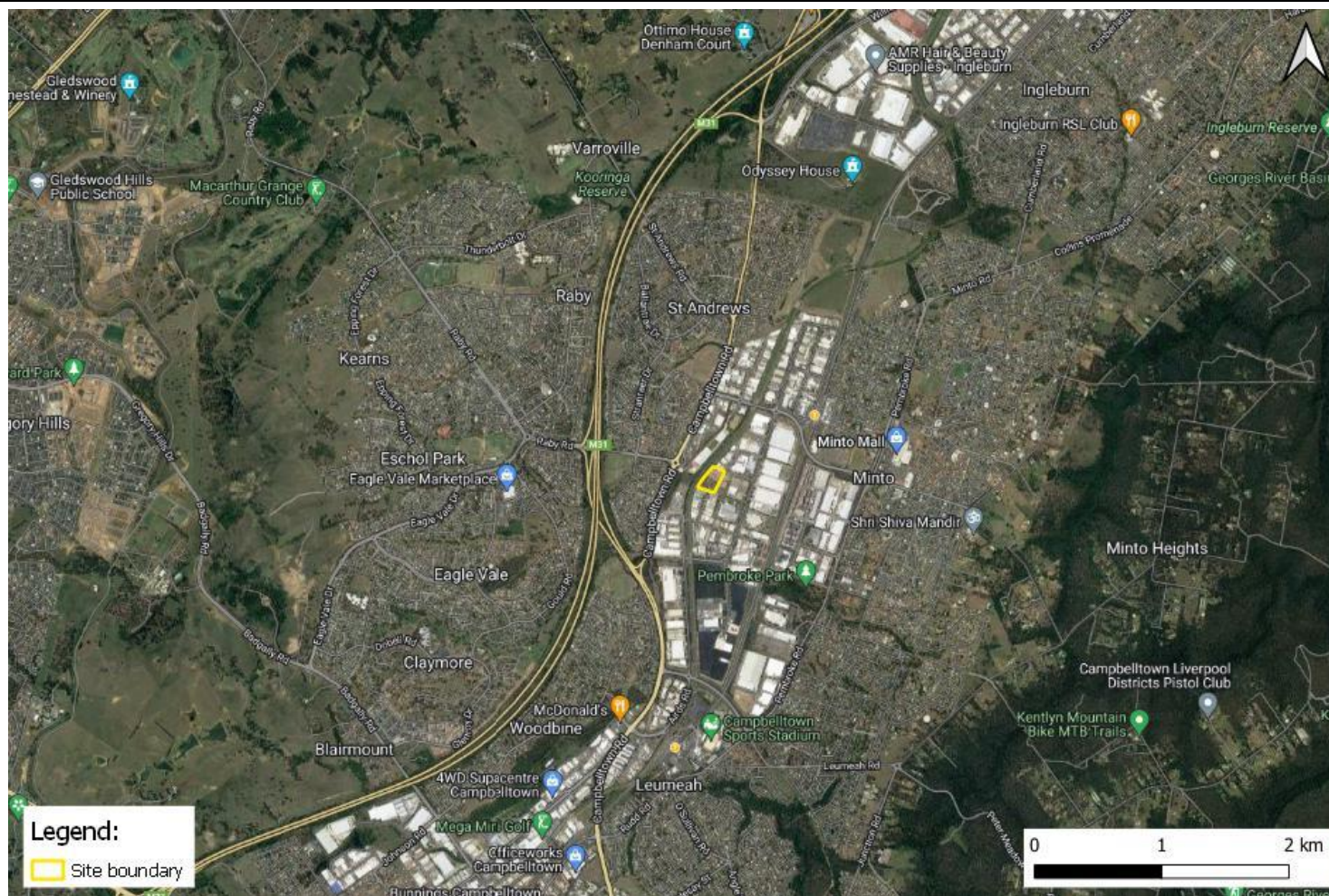
We note that this LMP has been prepared for water management during the operational phase of this project, and will be revised as needed, in order to remain up to date with changes to Site operations or regulatory requirements.

5 Appendix List

Appendix 1 Figures and Maps

Appendix 2 Landscape Plans: Concept Landscape Architects 2020 revised 2024

Site locality



Drawn by:	KP	Report reference:	CR_CCCHP	Key:	Refer to map legend.
Date:	6/7/22	Image source:	QGIS with Six Map overlay		

Figure 1: Site locality.

Site layout

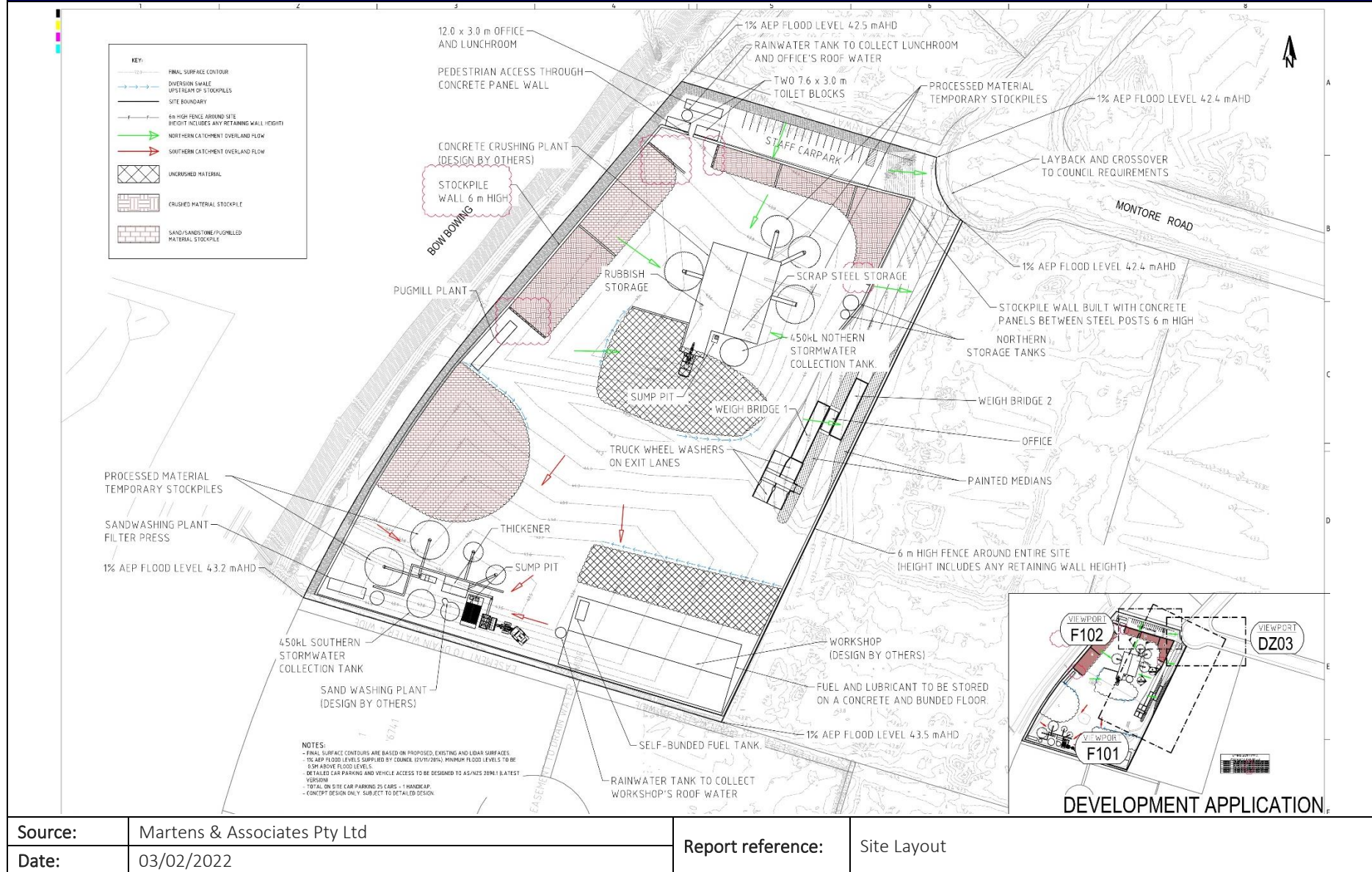
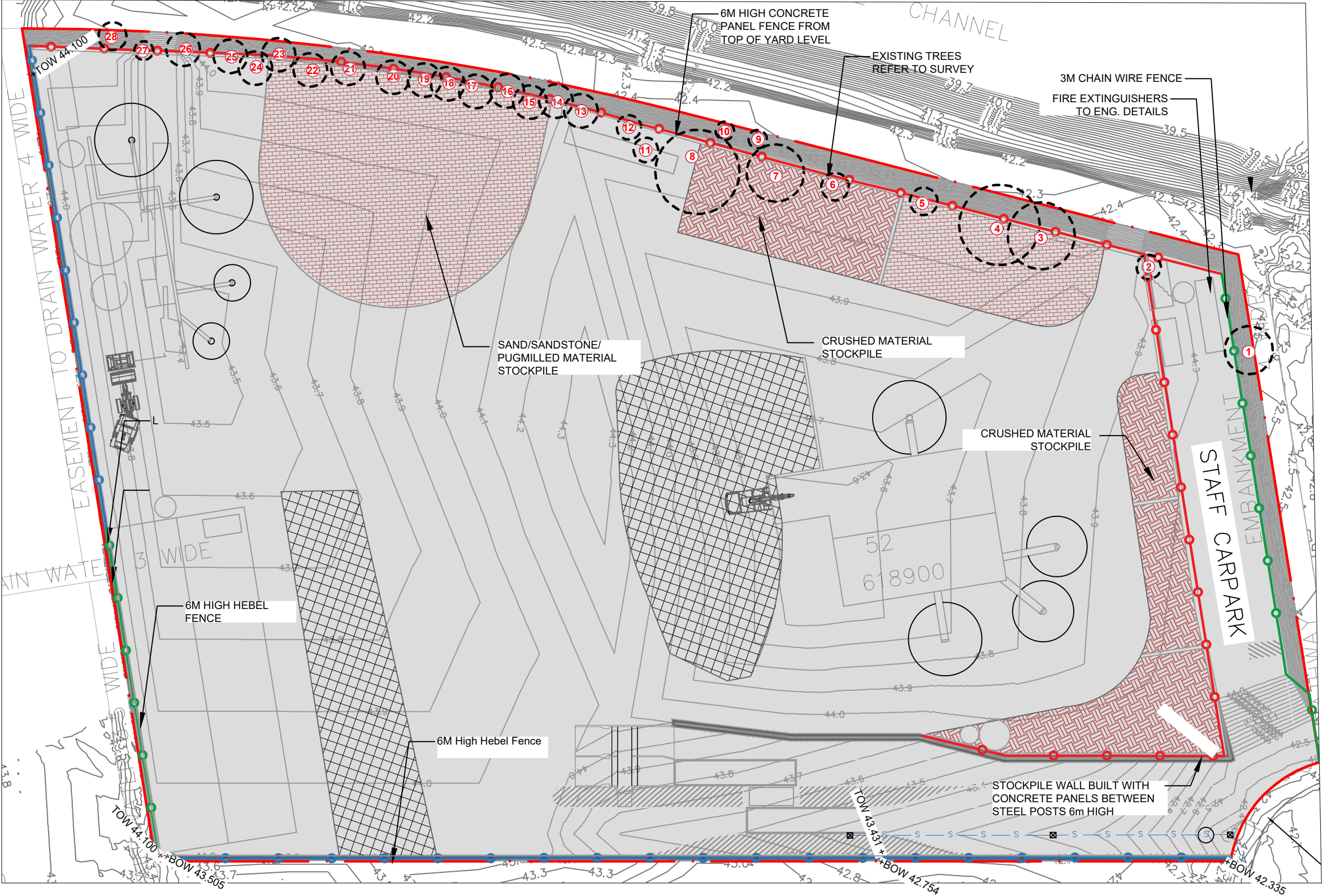


Figure 2: Site layout plan.

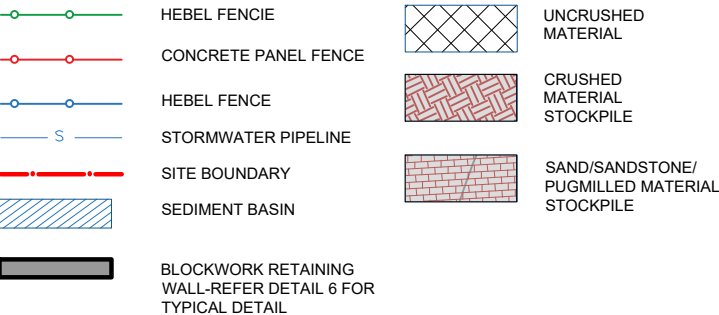
SITE LAYOUT



LOCATION PLAN



HARDSCAPE ITEMS



TREE SURVEY

Existing Trees based on site visit conducted by a Horticulturist on 24.01.17

No.#	Species	Size (Ht x Sp)	Condition	Action
1	Unidentified tree.	8x6	Good	Remove
2	Eucalyptus spp	6x3	Fair	Remove
3	Eucalyptus spp	12x10	Good	Remove
4	Eucalyptus spp	12x10	Fair	Remove
5	Eucalyptus spp	15x4	Poor	Remove
6	Eucalyptus spp	12x4	Poor	Remove
7	Eucalyptus spp.	9x3	Fair	Remove
8	Eucalyptus spp	16x12	Good	Remove
9	Allocasuarina spp	12x4	Poor	Remove
10	Allocasuarina spp	12x4	Poor	Remove
11	Eucalyptus spp		dead	Remove
12	Allocasuarina spp	6x3	Poor	Remove
13-28	Allocasuarina	8-12 tall	Fair	Remove

DRAWING SCHEDULE

SHEET #	DRAWING TITLE	REV.
/1	TITLE	
/2	SITE LAYOUT PLAN	F
/3	LANDSCAPE PLAN	F
	DETAIL + SPECIFICATION	D



REV	DATE	NOTATION/AMENDMENT
A	11.01.17	Preliminary DA prepared for review
B	27.01.17	Updated existing site condition
C	10.02.17	Co-ordinated with updated site plan
D	12.12.18	Co-ordinated with updated site plan
E	12.03.19	Finalized landscape plan
F	23.04.20	For submission
F	26.08.24	Concrete Recyclers Update

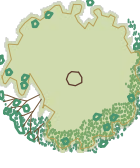
LANDSCAPE PLAN RESOURCE RECOVERY FACILITY

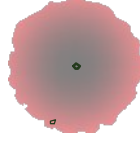
7 MONTORE RD, MINTO

LEGEND & SCHEDULE

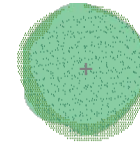
NOTES:
1. ALL FINAL PLANT QUANTITIES INDICATED ON PLANS SHALL BE CHECKED AND VERIFIED BY SUCCESSFUL LANDSCAPE CONTRACTOR.
2. ANY PLANT SUBSTITUTES REQUIRED DUE TO UNAVAILABILITY SHALL BE RECOMMENDED BY THE LANDSCAPE CONTRACTOR TO BEST MATCH SUBSTITUTED PLANTS AND APPROVED PRIOR TO PURCHASING BY THE LANDSCAPE ARCHITECT.
3. WORKS CERTIFIED FOR FINAL OCCUPANCY CERTIFICATE ARE TO MATCH APPROVED LANDSCAPE PLANS.
4. LANDSCAPE CONTRACTOR SHALL LOCATE AND AVOID SITE STORM WATER & DRAINAGE SERVICES. LOCATE TREES A MINIMUM 1.25M FROM PITS
5. ALL PLANTING AROUND EXISTING TREES SHALL BE ADJUSTED TO AVOID DAMAGE AND CLASHING WITH SURFACE ROOTS
* TREE SPECIES SELECTED FROM COUNCIL'S NATIVE GARDENING GUIDE

Small Tree

- 

Botanical Name: *Banksia integrifolia*
Common Name: Coastal Banksia (Native)
Pot size: 45L
Mature H x S: 6-8m x 4-5m
Qty Required: 13
- 

Botanical Name: *Ceratopetalum gummiferum*
Common Name: NSW Christmas Bush (Native)
Pot size: 45L
Mature H x S: 5-8m x 3-4m
Qty Required: 18
- 

Botanical Name: *Melaleuca decora**
Common Name: White Feather Honey Myrtle (Native)
Pot size: 45Lt
Mature H x S: 7m x 5m
Qty Required: 18
- 

Botanical Name: *Elaeocarpus reticulatus**
Common Name: Blueberry Ash (Native)
Pot size: 45L
Mature H x S: 8-10m x 6-7m
Qty Required: 10

- 

1V:2H GRADE EMBANKMENTS MASS PLANTED WITH ENDEMIC SPECIES INCLUDING SHRUBS & GROUNDCOVERS (REFER DETAILS 01 & 02)
- GROUNDCOVERS / GRASSES:**
- *Dianella prunina*
- *Hardenbergia violacea*
- *Lomandra longifolia*

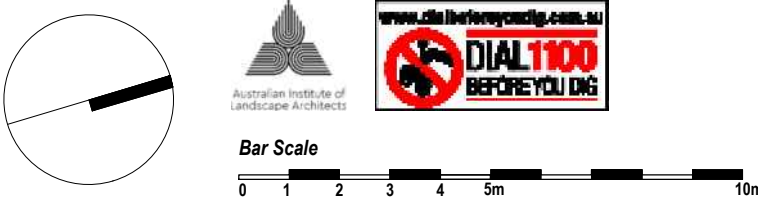
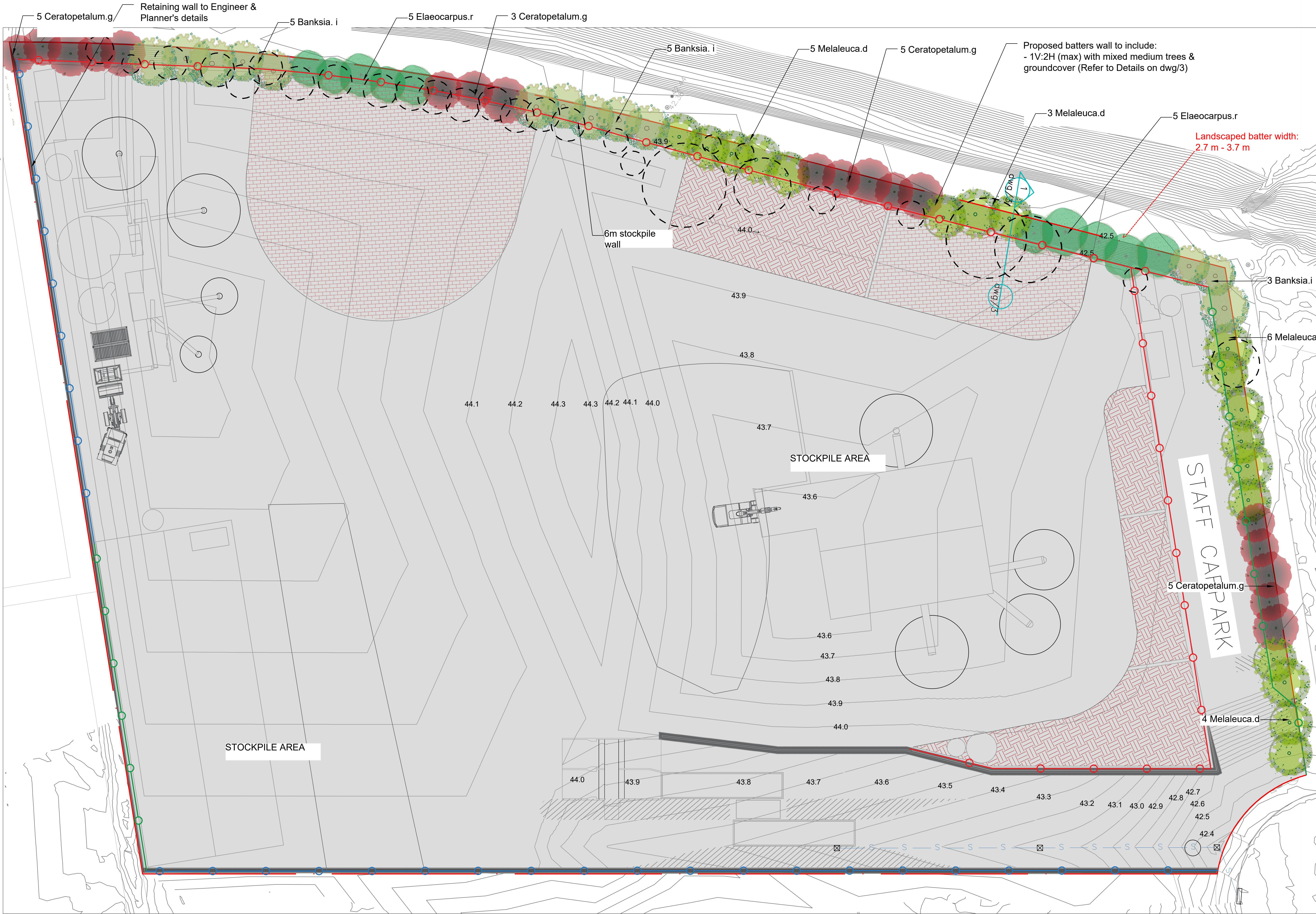
Pot size tube stock
Mature H x S: < .6m
Qty Required: 6/m2 (TOTAL 868.9m2)

THE FOLLOWING SHALL BE UNDERTAKEN TO ENSURE AVAILABLE MATERIAL FOR THE PLANTING PREPARATION OF THE FINAL REHABILITATED SITE:
- 300MM DEPTH TOPSOIL TO BE EXCAVATED AND STOCKPILED (WITHIN STAGE 5 EXCAVATION ZONE)
- SUBSOIL TO BE TO BE EXCAVATED AND STOCKPILED (WITHIN STAGE 5 EXCAVATION ZONE)

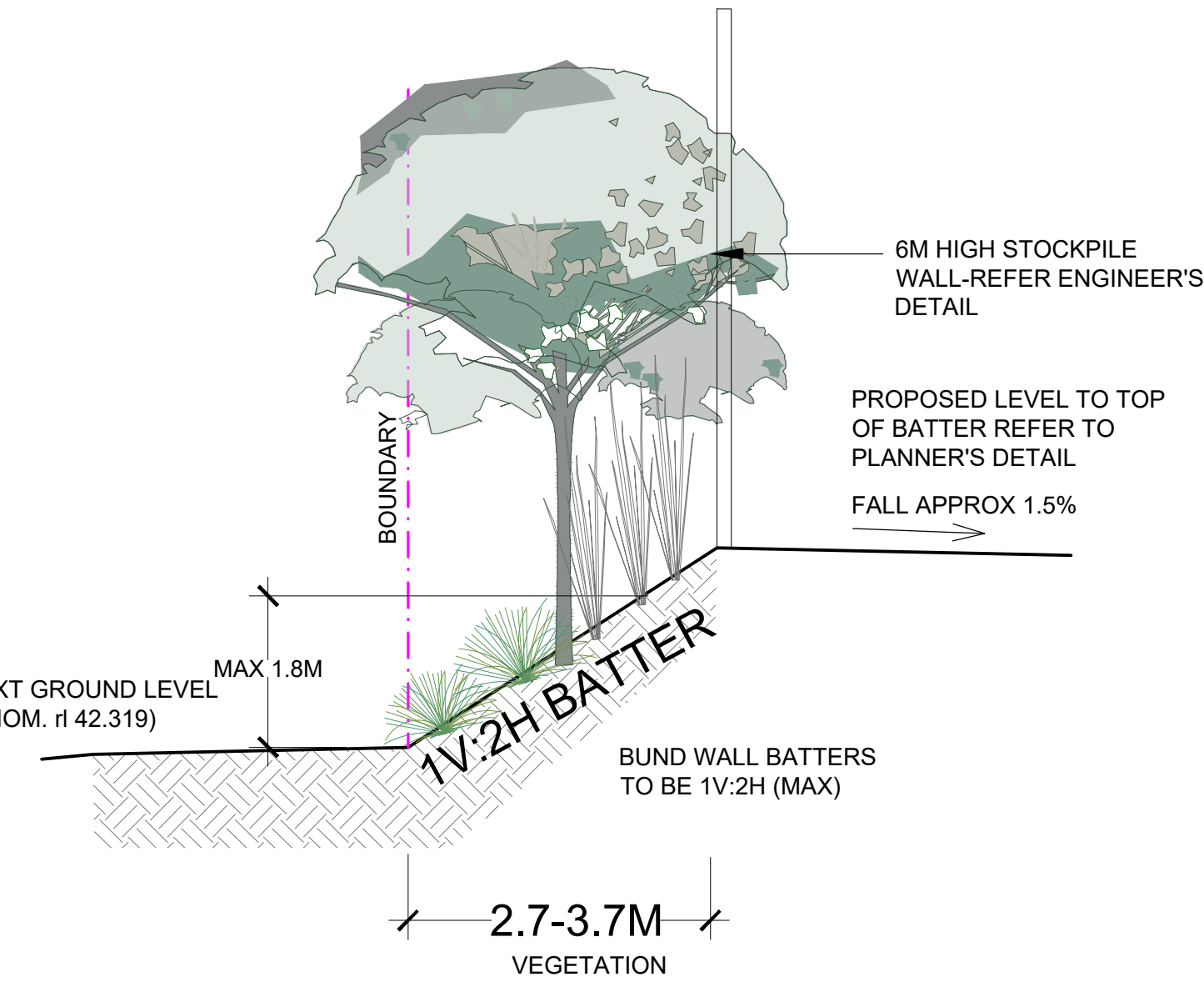
THIS MATERIAL SHALL BE EXCAVATED AND STOCKPILED PRIOR TO COMMENCEMENT OF THE EXTRACTION WORKS FOR EACH STAGE, AND SHALL BE STORED SEPARATELY TO STOCKPILED MATERIAL FOR BUND WALL CONSTRUCTION.

STOCKPILED MATERIAL SHALL BE USED PROGRESSIVELY AS AREAS OF THE SITE ARE EXCAVATED AND FINISHED IN THEIR FINAL FORM AND READY FOR REHABILITATION PLANTING WORKS.

STOCKPILES MUST BE CLEARLY LABELLED AND IDENTIFIABLE TO ENSURE CORRECT FUTURE USE. APPROPRIATE SEDIMENT AND EROSION CONTROL MEASURES SHALL BE UNDERTAKEN TO ENSURE NO MIXING, LEACHING, RUN-OFF OR CONTAMINATION OF STOCKPILES.

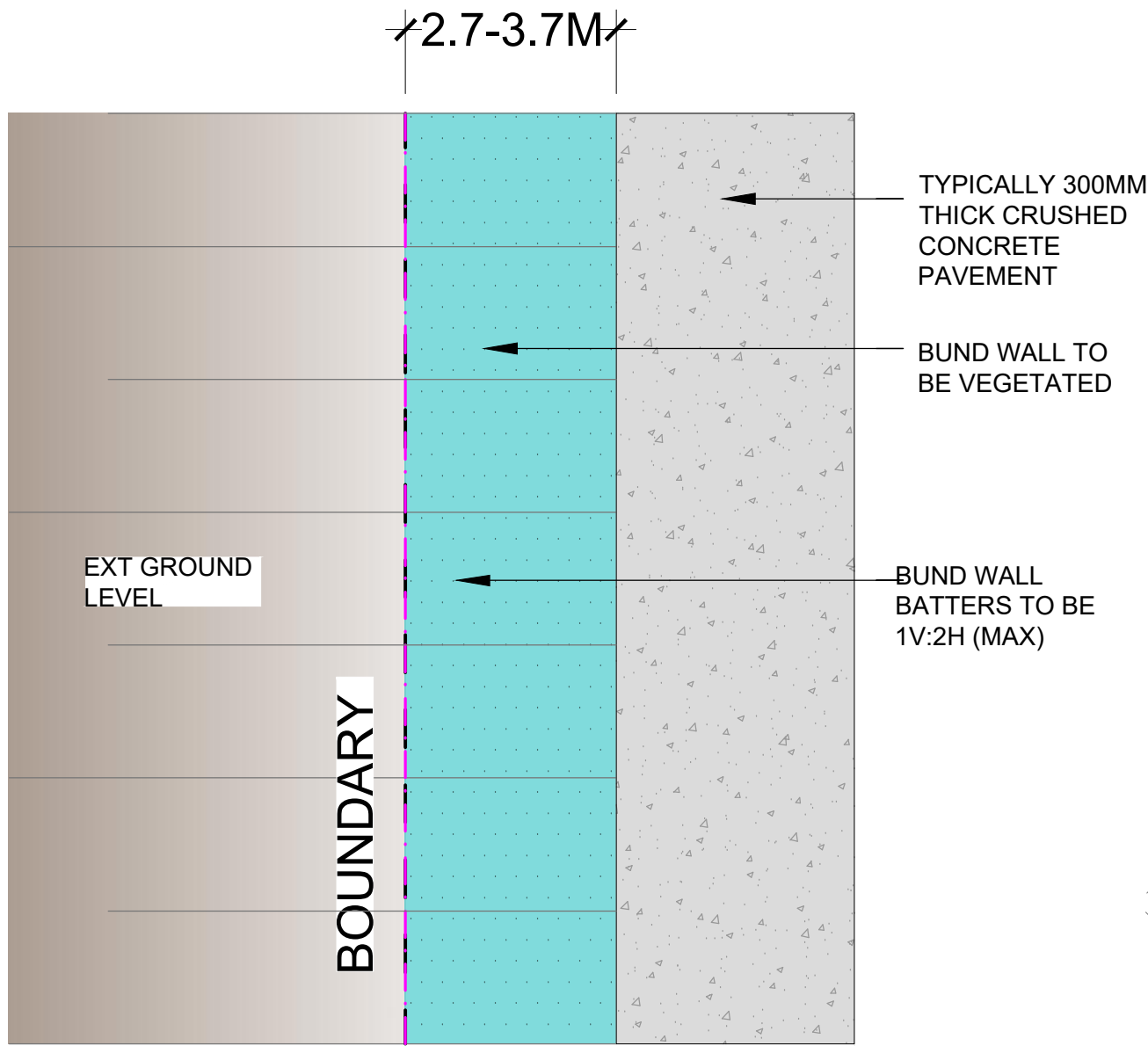


C		COUNCIL CAMPBELLTOWN	REV A	DATE 11/01/17	NOTATION/AMENDMENT Preliminary concept prepared for review	PROJECT: LANDSCAPE RESOURCE RECOVERY FACILITY 7 MONTORE ROAD, MINTO	TITLE: LANDSCAPE PLAN	DWG No: LPDA 17 - 186 / 2	ISSUE: G	STATUS: CONSTRUCTION PLAN	
		SITE MINTO CONCRETE RECYCLERS	B	27/01/17	Revised planting					DATE: AUGUST 2024	
			D	12.12.18	Co-ordinated with updated site plan					DRAWN: A.S.	CHECKED: A.M.
			E	12.03.19	Finalized landscape plan						
			F	23.04.20	For submission						
			G	26.08.24	Concrete Recyclers Update for construction						



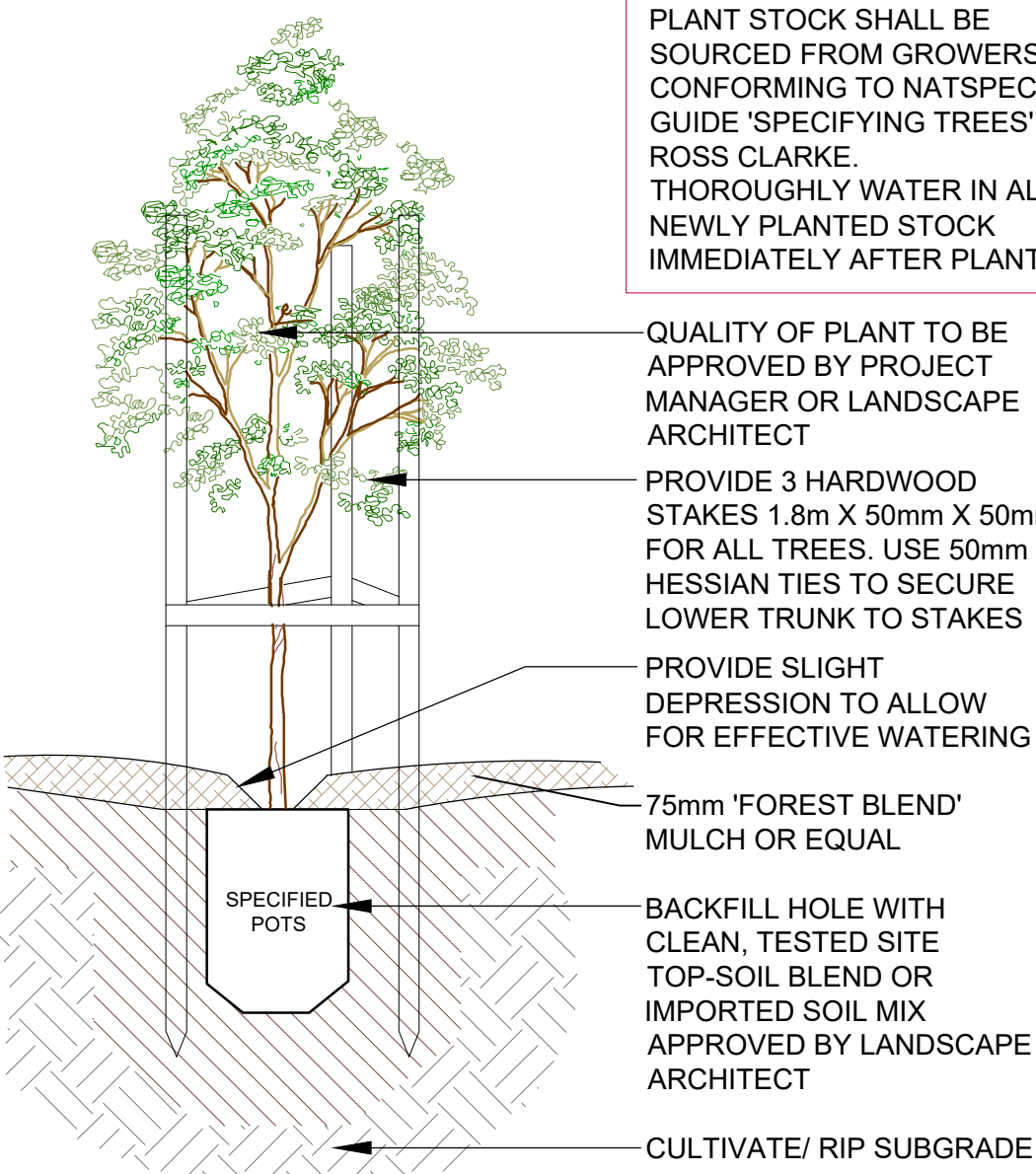
DETAIL 01: BUND WALL SECTION

N.T.S



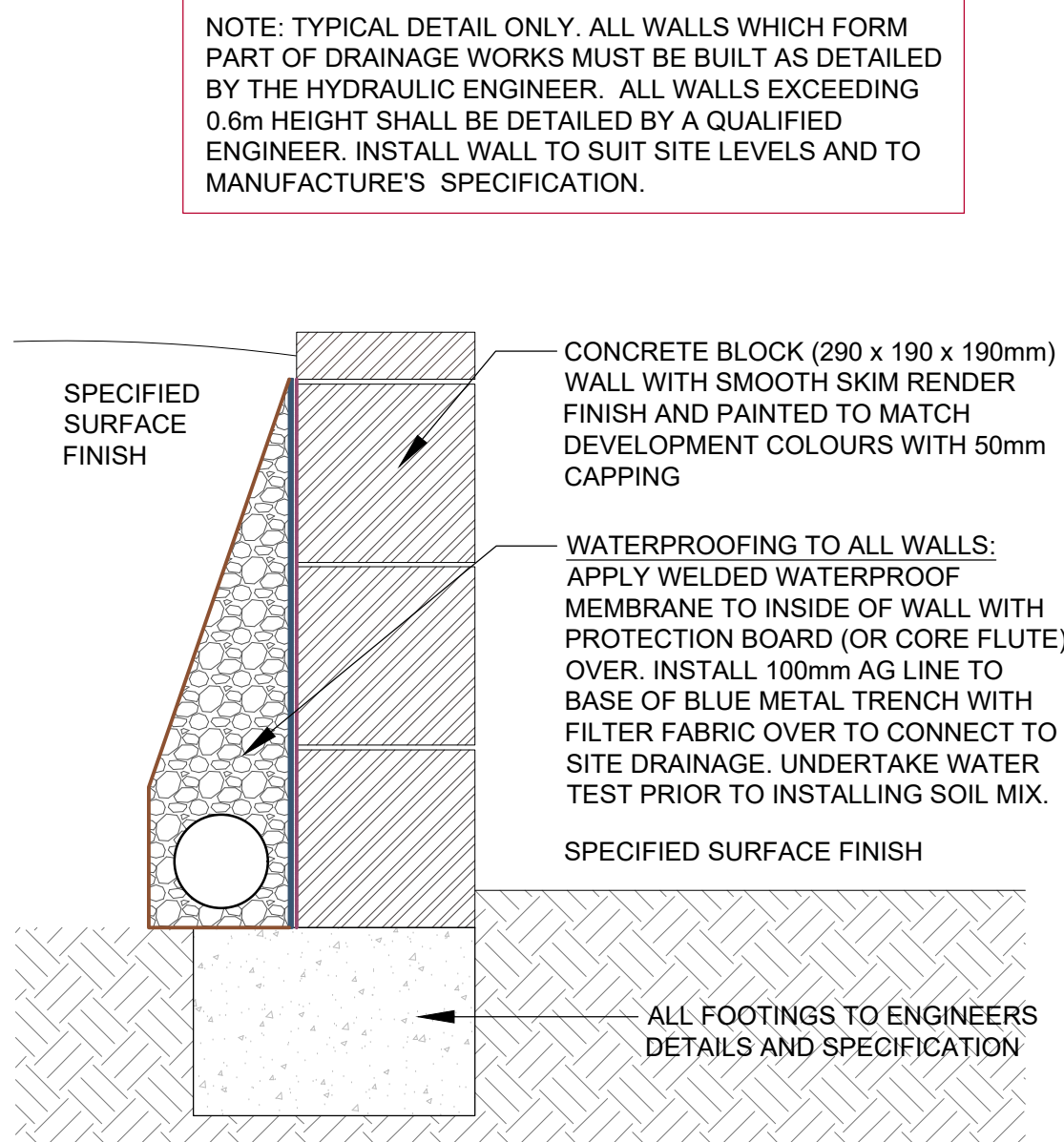
DETAIL 02: BUND WALL PLAN

SCALE 1:50



DETAIL 5: TREE PLANTING

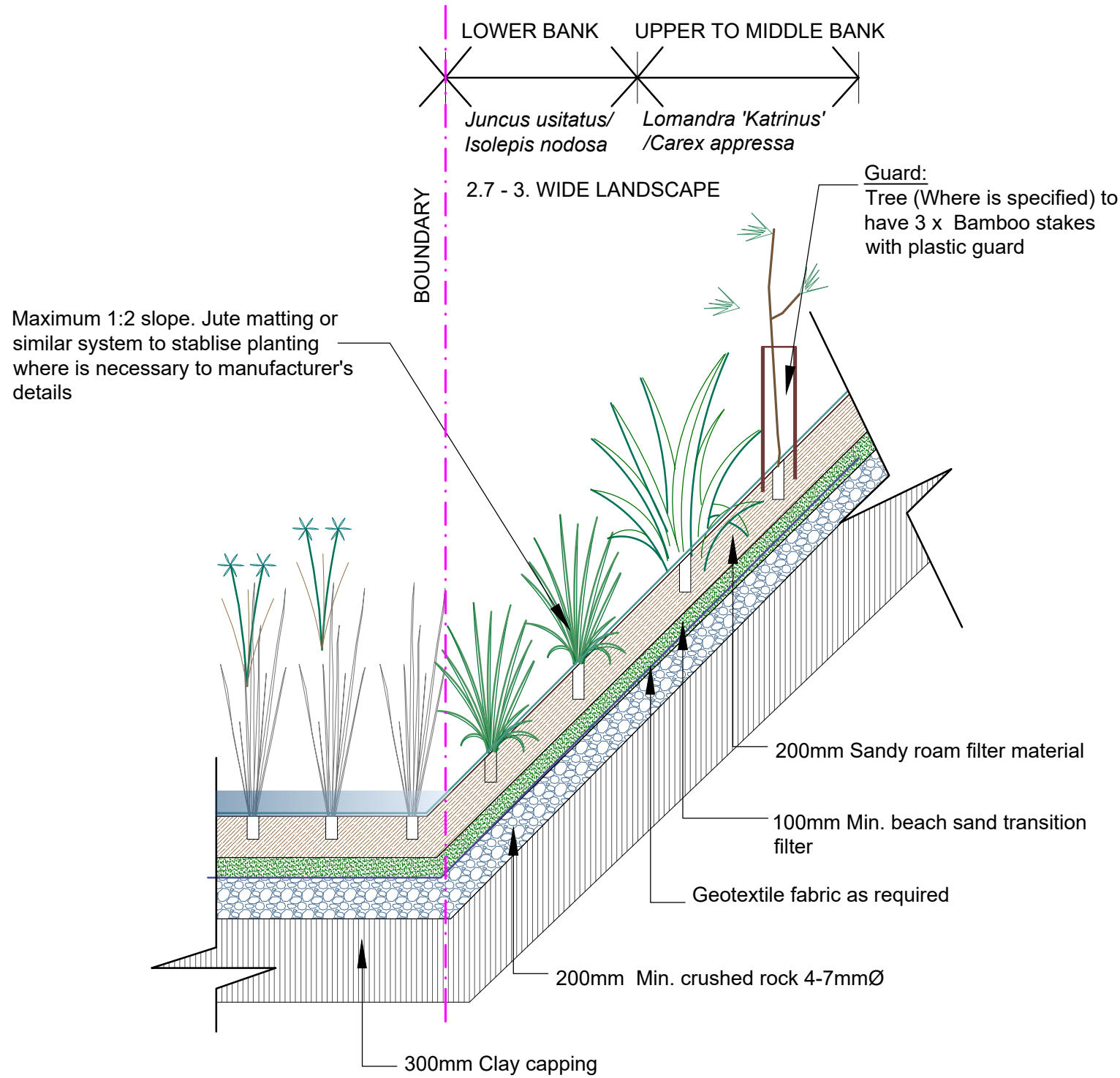
SCALE: 1:10



DETAIL 6: RETAINING WALL

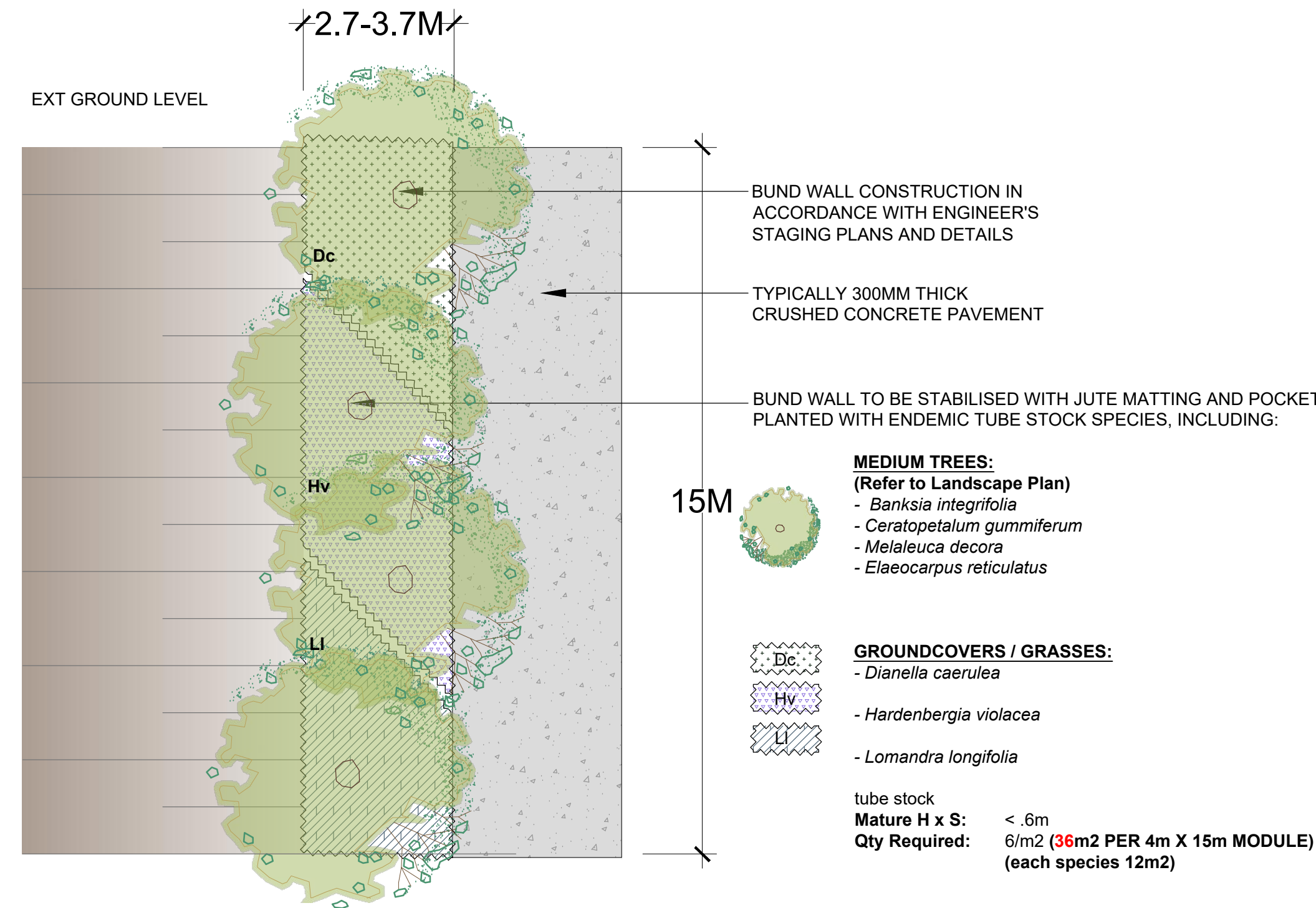
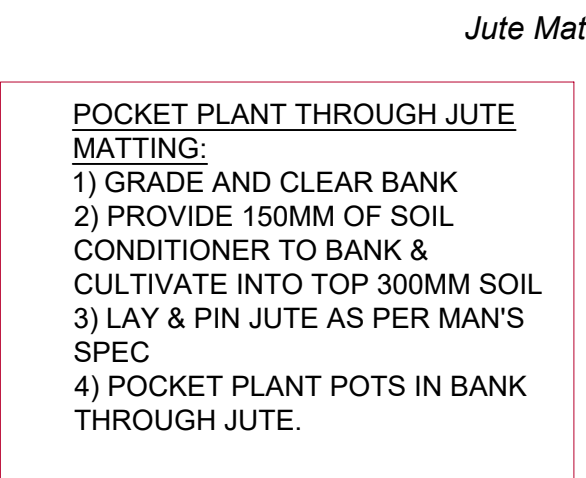
N.T.S

EMBANKMENT PLANTING ZONES



DETAIL 03: PLANTING FOR BUFFER SETBACKS AND EMBANKMENTS WITH 1V:2H GRADE

N.T.S



DETAIL 04: PERMANENT BUND WALL PLANTING PLAN

SCALE 1:100



MAINTENANCE SCHEDULE

GENERAL
AFTER THE COMPLETION OF THE SPECIFIED REHABILITATION WORKS, VEGETATED AREAS SHALL BE SUBJECT TO A MINIMUM LANDSCAPE WORKS PERIOD OF **12 MONTHS**. DURING THIS TIME THE LANDSCAPE CONTRACTOR SHALL MAKE GOOD ALL DEFECTS WHICH MAY OCCUR FOR WHATEVER REASON.

CONSOLIDATION AND MAINTENANCE SHALL MEAN THE CARE AND MAINTENANCE OF ALL AREAS UNDERGOING REHABILITATION IN ACCORDANCE WITH THIS REPORT AND ASSOCIATED PLANS, ENSURING THAT A SATISFACTORY RESULT OCCURS FOR THESE AREAS WITH REGARDS TO GERMINATION AND ESTABLISHMENT.

THE MAINTENANCE SHALL INCLUDE, BUT NOT BE LIMITED TO, THE FOLLOWING ITEMS WHERE AND AS REQUIRED:

- WATERING ALL LANDSCAPED AREAS
- MONITORING GERMINATION, REPLACEMENT PLANTING AND RE-HYDROMULCHING
- WEED CONTROL
- MAKE GOOD AREAS OF SOIL SUBSIDENCE OR EROSION
- TOPPING UP OF MULCHED AREAS
- SPRAY / TREATMENT FOR INSECT AND DISEASE CONTROL
- MONITORING AND CONTROLLING RABBITS

WATERING
ALL AREAS WHICH HAVE BEEN HYDROMULCHED OR POCKET PLANTED SHALL BE WATERED IN THOROUGHLY FOLLOWING INITIAL WORKS, & SHALL BE WATERED A MINIMUM 3 TIMES PER WEEK DURING WINTER, AND 4 TIMES PER WEEK DURING SUMMER. WATERING SHALL BE DONE BY HAND, UTILIZING DAM WATER ON SITE. FREQUENCY OF WATERING MAY BE ADJUSTED BASED ON WHETHER CONDITIONS, WITH THE OBJECTIVE TO ENSURE THE MAXIMUM PERCENTAGE OF SUCCESSFUL ESTABLISHED PLANT STOCK.

MONITORING GERMINATION, REPLACEMENT PLANTING AND RE-HYDROMULCHING
AREAS UNDERGOING REHABILITATION SHALL BE CONTINUALLY MONITORED UNTIL WELL ESTABLISHED, WITH FAILURES BEING REPLACED IN LINE WITH THE REPORT AND LANDSCAPE SPECIFICATION, AND FAILED HYDROMULCHING RE-SPRAYED.

ALL REPLACEMENTS SHALL BE TO SPECIFICATION, AND OF A SIZE EQUIVALENT TO SIMILAR HEALTHY SPECIES SURROUNDING THE REJECTED PLANT, OR, AS IN THE CASE OF MATURE TREES, TO THE ORIGINAL SIZE AND QUALITY, AS A MINIMUM.

WEED CONTROL
WEED REMOVAL SHALL BE CONDUCTED REGULARLY, WITH HAND REMOVE ALL TOP GROWTH ROOTS, RHIZOMES AND STOLONS OF UNWANTED VEGETATION. THE REGULAR CONTROL OF ALL WEEDS IS ESSENTIAL. THE APPLICATIONS OF PRE-EMERGENT SPRAYS ARE ACCEPTABLE WITH APPROVED CHEMICALS APPLIED IN STRICT ACCORDANCE WITH MANUFACTURER DIRECTIONS. ANY SPRAYING SHALL BE DONE DURING CALM DAYS, TO AVOID WINDS BLOWING HERBICIDES ONTO NATIVE PLANTING.

INSECT, DISEASE CONTROL AND RABBIT CONTROL
THE LANDSCAPE CONTRACTOR SHALL BECOME FAMILIAR WITH THE HEALTHY APPEARANCE OF THE PLANT MATERIAL AND CONSTANTLY MONITOR IT FOR DAMAGE OR PEST INFESTATIONS. WHEN EITHER OF THESE BECOME EVIDENT THE CONTRACTOR SHALL IMMEDIATELY APPLY THE NECESSARY CONTROL MEASURES.

IF NEWLY PLANTED AREAS ARE BECOMING SUBJECT TO RABBIT ATTACK, IT MAY BE NECESSARY TO INSTALL APPROVED RABBIT-PROOF FENCING TO THE AREA OF REHABILITATION, TO ENSURE MINIMAL DAMAGE IS DONE.



C	COUNCIL CAMPBELLTOWN	REV A	DATE 11/01/17	NOTATION/AMENDMENT Preliminary concept prepared for review	PROJECT: LANDSCAPE PLAN RECSOURCE RECOVERY FACILITY 7 MONTORE ROAD, MINTO	TITLE: SPECIFICATION & DETAILS	STATUS: CONSTRUCTION	
	CLIENT MINTO CONCRETE RECYCLERS	B	17/01/17	Review planting			SCALE: 1:300 @ A1	DATE: AUGUST 2024
		C	10/02/17	Co-ordinated with updated plan			DRAWN: A.S	CHECKED: A.M
		D	12.12.18	Co-ordinated with updated plan				
		E	26.08.24	Update by Concrete Recyclers with Addition of width of batters				

Emergency Response Plan

Concrete Recyclers

7 Montore Road, Minto, NSW

August 2024

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Cover image: Satellite image of the site and its surrounds. Image credit: Nearmap.

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Acknowledgement of Country

4Pillars acknowledges the Traditional Owners of the land on which this site is located, the people of the Dharawal Nation. We acknowledge their continuing connection to land and sea Country and we pay our respects to their Elders past, present and emerging.

Declaration and limitations of this document

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Revision History				
Revision	Date	Details/Comments	Review team	Authorisation
1.0	26/09/2022	Draft ERP document for client review.	K. Porter J. Hammond	Concrete Recyclers (Group) Pty Ltd
1.1	11/11/2022	Final ERP document	K. Porter J. Hammond	Concrete Recyclers (Group) Pty Ltd
1.2	27/08/2024	Revising Site layout to current plan	K. Porter J. Hammond	Concrete Recyclers (Group) Pty Ltd

1 Introduction

1.1 Application

4Pillars have developed this Emergency Response Plan (ERP) on behalf of Concrete Recyclers (Group) Pty Ltd (Concrete Recyclers) to detail the emergency response for both the construction phase and the operation phase of the development of a Resource Recovery Facility (RRF) at 7 Montore Road, Minto (the Site). This ERP has been developed to satisfy requirements and conditions outlined in the State Significant Development (SSD) Consent 5339 (the Development Consent), and in accordance with relevant State legislation and best-practice guidelines, including:

- Hazardous Industry Planning Advisory Paper (HIPAP) No. 1, 2 & 6;
- Resilience and Hazards SEPP; and
- Campbelltown (Sustainable City) Development Control Plan 2015;

In preparing and reviewing the ERP, it is important to reiterate the definition, objectives, and purpose of the ERP. This serves to reinforce to all personnel, the importance and role of the ERP.

1.2 Objectives

The purpose of this ERP is to detail emergency response and facilitate better coordination with the relevant response agencies. The ERP is to provide reference for the procedures and responsibilities for emergency response, and this extends to the ongoing management for the prevention and mitigation of any such hazard.

The ERP works with and is complementary to:

- The Fire Safety Study (FSS);
- The Site Induction; and
- Other Site Workplace Health and Safety Management Plans.

Together, these documents establish the framework that helps protect the health, safety and well-being of all persons and stakeholders associated with the Site.

This ERP aims to:

- Minimise and control the risk of an emergency at the Site by requiring the identification of risks and the development of planned actions to minimise and manage those risks;
- Ensure the comprehensive and immediate communication of an emergency to personnel at the Site, emergency services, other relevant authorities (Environment Protection Authority, Campbelltown City Council, NSW Ministry of Health, and WorkCover NSW), and stakeholders within the community who may be affected by the impacts of the emergency);
- Protect personnel, emergency responders and stakeholders from harm; and
- Ensure that the ERP is properly implemented by trained personnel, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

The table below outlines the requirements of Condition B47 of the Development Consent and where in this ERP they are addressed:

Condition	Where addressed in this ERP
B47. The Applicant must develop and implement an Emergency Response Plan (ERP) no later than two months prior to the commencement of commissioning of the development, or within such further period as the Planning Secretary may agree. The ERP must:	
(a) address foreseeable on-site and off-site fire events and other emergency hazards;	The likelihood and likely causes of fire, as well as other emergency hazards are discussed in the Risk Assessment Section (2) of this ERP.
(b) detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards);	The Risk Control Measures Section (3) of this ERP details the measures that will be implemented to reduce the risks of likely hazards.

(c) detail other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site;	Fire risk control measures are detailed in Section 3.2.
(d) have two copies stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s.	See Section 1.3.

1.3 Availability of ERP

Two copies of the ERP will be maintained in written form at the premises as per Condition B47(d) of the Development Consent, so that it is readily available for implementation and training. One copy of the ERP will be stored in an 'Emergency Information Cabinet' in the Site Office opposite the weighbridge at the Site entrance, and a second copy will be kept in the Site Office near the staff carpark. A copy of the ERP will also be made available on the Concrete Recyclers website. If for any reason the plan is unavailable at the website and a person has made a written request, the ERP will be provided without charge.

1.4 Site Details

The subject site is located at 7 Montore Road, Minto, NSW (the Site). Concrete Recyclers (Group) Pty Ltd (Concrete Recyclers) is the current occupant of the premises and intends on developing the Site into a Resource Recovery Facility. The proposed facility will receive up to 450,000 tonnes per annum of mixed Construction and Demolition waste. Received waste materials will be stored and processed at the Site for reuse. The proposed layout for the Site is included in Figure 2.

The Site details are summarised in Table 1 below. Please refer to Figure 1 for a map of the Site locality.

Item	Details
Local Government Area	Campbelltown City Council
Address	7 Montore Road, Minto, NSW
Lot(s)	Lot 52 DP 618900
Zoning	IN1 – General Industrial (Campbelltown LEP 2015)
Site size (total)	23,500 m ² (2.35 ha)
Previous land use	Various commercial and industrial activities including waste and equipment storage. Currently used for equipment storage by both Concrete Recyclers and Coates Hire.
Intended future land use	Resource Recovery Facility
Surrounding land uses	IN1 – General Industrial (Campbelltown LEP 2015) SP2 – Drainage (Campbelltown LEP 2015)
Elevation	Approximately 43 m AHD above sea level
Hydrology	The Site is located on the south bank of Bow Bowing Creek, within the Bow Bowing Bunbury Curran Creek catchment.

Table 1: Summary of Site details.

2 Risk Assessment

2.1 Description and likelihood of hazards

The proposed Resource Recovery Facility will receive up to 450,000 tonnes per annum of mixed Construction and Demolition waste (primarily concrete, brick, asphalt, sandstone and sand). Once received, waste materials will be segregated, processed and exported for reuse.

The main hazards that have the potential to cause an emergency on Site are hydrocarbons and chemical spills, fire or explosion, flood and other natural events, vehicle or mobile plant hazards and hazardous wastes. For the purposes of this ERP, a hazard will be considered an emergency when it threatens to harm people, property or the environment, and requires timely corrective action.

Table 2 below provides a summary risk assessment for hazards that may occur at the Site. Sections 2.2 - 2.8 provide further detail on these hazards and their likelihood. Pre-emptive risk control actions for each hazard are detailed in Section 3.

Table 2: The risk ratings are based on uncontrolled likelihood and consequence of each hazard and do not take into account the proactive controls outlined later in this document. Note that the descriptions for 'hazard types' are broad and there are likely to be several sub-categories for each hazard.

Type	Hazard	Potential Impact(s) ¹	Likelihood (uncontrolled) ²	Impact (uncontrolled) ³	Risk Rating ⁴
Spill/Leak	Mobile plant/vehicle fuel – minor spill or leak	Fire, surface water, land, human health, Site structures	Medium	Low	Moderate
	Mobile plant/vehicle fuel – major spill or leak	Fire, surface water, land, human health, Site structures	Low	High	Severe
	Chemical – minor spill (<20L)	Surface water, land, human health	Low	Medium	Moderate
	Chemical – major spill (≥20L)	Surface water, land, human health	Rare	High	Moderate
Fire	Minor fire	Air quality, human health	Low	High	Severe
	Major fire	Air quality, land, human health	Low	Very high	Critical
Flood	Minor flood	Surface water, land, human health	High	Medium	Severe
	Major flood	Surface water, land, human health	Medium	High	Severe
Other natural events	Severe erosion	Surface water, land, Site structures	Rare	High	Moderate
	Severe/Electrical storm	Human health, Site structures	Rare	High	Moderate

¹ These are examples of systems or entities that may be impacted by the incident. Examples include environmental impacts, impacts to Site structures, and human health. This list is not exhaustive and will vary between incidents.

² Qualitative categories of likelihood used for this assessment are Rare, Low, Medium and High.

³ Qualitative categories of consequence used for this assessment are Low, Medium, High and Very High.

⁴ The risk rating is based on the likelihood x impact of a hazard. Risk rating categories are Sustainable, Moderate, Severe and Critical.

Type	Hazard	Potential Impact(s) ¹	Likelihood (uncontrolled) ²	Impact (uncontrolled) ³	Risk Rating ⁴
	Severe wind	Site structures, air quality, human health	Rare	High	Moderate
Vehicle/mobile plant hazard	Collision	Site structures, human health	Medium	Medium	Moderate
	Combustion	Site structures, human health	Low	High	Moderate
Hazardous materials	Contaminated wastes	Land, surface water, air quality, human health	Medium	Medium	Moderate
	Dust	Air quality, human health	High	Low	Moderate

2.2 Spill/Leak

Chemical, oil and fuel spills or leaks have the potential to cause harm to Site property (corrosion, oil slick), environment (contamination of land or surface water) and human health (potentially harmful chemicals or fumes, potential for flammable materials to combust). The largest quantity of fuel stored on the Site will be in a self-bunded fuel tank just outside of the workshop in the southern portion of the Site. In this location, it is not likely to be accidentally hit or damaged by other vehicles moving on site. Therefore, the likelihood of a significant fuel spill occurring is **low**. However, if a large diesel spill were to occur on Site, the impacts on the environment and personnel are potentially **high** if response protocols are not followed.

Mobile and fixed plant that will be present during the operation of the Site that require diesel include trucks, excavators, loaders and bobcats. These plant will be involved in the transfer, placing, and processing of waste. The most likely hazard associated with the operation of this equipment is a spill from a broken oil or fuel line which would result in oil or fuel being discharged onto land and/or entering the water treatment system. Without pre-emptive control measures, there is a **medium** chance of a small fuel spill of this kind occurring. The quantity of diesel fuel stored in the fuel tanks of the mobile and fixed plant is relatively small. If it were to escape, in most circumstances the hazard would likely only cause **low** impact on the environment or the personnel on Site.

Various chemicals will also be stored on Site including but not limited to lubricants and oils, paints and solvents, and industrial and domestic cleaners. The majority of these will be bunded and stored for use within the workshop area. Additional domestic liquid cleaning products (less than 10L in total) used for cleaning the office and toilet areas may be stored in various locations on Site. The likelihood of a major chemical spill (defined as 20L or more of product spillage) occurring is **rare** due to the location of the chemical storage. In the unlikely event of a major chemical spill occurring, impacts to human health and the environment without control measures are expected to be **high**. The likelihood of a minor chemical spill (less than 20L) occurring is considered **low**. If a minor spill was to occur, it is expected that there would be a **medium** risk of material harm to the personnel or the environment.

2.3 Fire

Fire has the potential to impact human health, Site structures and the environment. The proposed facility will not receive any combustible material (e.g., wood, paper, cardboard, plastic, textiles, fuels, or rubber). Due to the nature of the waste materials accepted on site, there is a **low** risk of fires occurring on Site. However, fires could still occur from the combustion of fuel or chemical spills, or a plant/vehicle collision or malfunction. Any fire that occurs on Site should be treated as an emergency and responded to immediately. In the event of an off-Site fire in the area, Site personnel are to follow the instructions of emergency services, stop work and evacuate when necessary.

Without control and response measures, a minor fire on Site is likely to have **high** impacts on property, environment, and personnel safety, while a major fire is likely to have **very high** impacts. Implementation of the pre-emptive controls and emergency response detailed below will reduce the likelihood and risk of fire on Site.

2.4 Flood

The Site is located on the south bank of Bow Bowing Creek, within the Bow Bowing Bunbury Curran Creek (BBBCC) catchment. According to the BBBCC Strategic Floodplain Risk Management Study and Plan, the entirety of the Site is

mapped within the Probable Maximum Flood (PMF) and areas of 0.1% - 20% AEP are mapped along the perimeters of the Site. The entirety of the Site is assumed to be impacted by the PMF, however smaller flood extents may only impact portions of the Site. For the purposes of this ERP, a minor flood has a **high** likelihood of occurring on Site, and a major flood has a **medium** chance of occurring. Minor floods are expected to have **medium** impacts, limited to on-site (e.g. disruptions to operations, property damage, etc). Impacts of major floods are predicted to be **high** if not properly controlled.

2.5 Other natural events

Other natural events that have a possibility of occurring on Site include erosion, severe or electrical storms and severe winds. Erosion could occur after flooding or periods of heavy rain. Severe erosion could impact the stability of structures on Site and pollute receiving waters. Severe storms on Site have a **moderate** risk rating and have the potential to impact the safety of personnel, cause damage to Site structures, and cause flooding. Severe winds on Site would have similar impacts, and also have a **moderate** risk rating. Control and mitigation measures for these natural hazards are detailed in Section 3 below.

2.6 Vehicle/mobile plant

Vehicles and mobile plant including trucks, excavators, forklifts, loaders and bobcats will be active on Site throughout the operation. Risks associated with vehicles and mobile plant on Site include; collisions with other vehicles/plant, Site structures or personnel, or combustion as a result of collision or fuel leakage. Uncontrolled, these hazards have **moderate** risk ratings. Mitigation measures are discussed in Section 3.

2.7 Hazardous materials

The proposed resource facility will be permitted to receive and process concrete, brick, asphalt, sandstone and sand, and will not be permitted to receive any hazardous or special waste (i.e., asbestos). However, there is still a risk that illegal, contaminated waste may be brought to the facility. Illegal waste is defined here as material that is not permitted to be accepted at the licensed facility and therefore must be 'turned away'. The illegal material could be a full vehicle load, or it could consist of illegal waste mixed with permitted waste. In either instance, the entire load of waste must be treated as unsuitable and managed appropriately. Response protocols for any illegal or contaminated waste on Site are detailed in Section 3 below.

2.8 Dust

The main sources of dust generation on Site will be the crushing of concrete, the loading and unloading of wastes, static waste storage stockpiles and movements of mobile plant. The likelihood of dust leaving the Site is **high** with no controls in place. Extreme weather events (i.e., hot, windy days) increase this likelihood, however, the proposed controls outlined in Section 3 will reduce the likelihood of dust leaving Site.

3 Risk Control Measures

Several protocols, procedures, ongoing maintenance and other risk control measures will be implemented at the Site in order to reduce the impacts of potential hazards. The information provided below outlines the pre-emptive actions to be taken in relation to each category of hazard.

3.1 Spills/Leaks

Diesel fuel will be stored in a self-bunded tank to the south of the Site (refer to Figure 2), and mobile plant and equipment that require diesel fuel will be used throughout the construction and operation of the facility. Spills or fuel leaks could occur at the main storage tank or from plant fuel lines. The main fuel tank will be inspected daily as part of the Site Supervisor (or their delegate's) operational responsibilities. If the tank is determined to be faulty or damaged in any way, the fuel will be pumped from the tank and the tank removed for repair or replacement.

Mobile plant will be refuelled according to a documented procedure to minimise spills. Mobile plant and other equipment are to be checked daily by the operators as part of their daily start-up and inspection routine. All plant operators will be trained to check and inspect their plant and equipment before they commence work. Maintenance records are to be kept for all vehicles and plant on the Site.

Should an operator find a fault with the any part on the plant, including a leaking fuel line, or broken hydraulic lines, it is to be reported to the Site Supervisor to be rectified. A leaking fuel or hydraulic line or other issues that may result in a hydrocarbon or oil spill is to be either repaired, or replaced, as soon as practicable.

Any oil or diesel fuel that has spilled will be isolated and cleaned up using spill kits. Spill kits will be located in the workshop, processing buildings and at the diesel fuel tank. Staff will be trained in spill clean-up procedures during induction. Spill kits are to be replaced promptly once they have been used and checked monthly to ensure they are effective in spill clean-up.

Chemicals, fuels and oils on Site during operation will be stored according to the Chemical Storage Management Plan. Chemicals will be stored undercover and bunded where practicable. Application and storage of chemicals will occur strictly according to the corresponding safety data sheet. Ensuring quality housekeeping through the storage of fuel, lubricants and oils, paints and solvents, and industrial and domestic cleaners in a bunded area, maintenance and proper use of spill kits, regular inspections of storage areas and staff training would further reduce the likelihood of spills. Failure to maintain spill kits and adequately train staff on how to respond to this type of hazard could increase the severity of potential impacts to personnel, property and environment. Further details can be found in the Chemical Storage Management Plan for the Site.

3.2 Fire

3.2.1 Flammable/combustible materials

As stated above, flammable and combustible materials such as fuels, oils and other chemicals are to be stored and maintained in order to prevent spills which could pose a fire risk. Quick and effective use of spill kits by trained staff will prevent spills and accidents that may increase the risk of a fire hazard.

3.2.2 Site layout

The Site will not accept any combustible waste types (e.g., wood, paper, cardboard, plastic, textiles, fuels, or rubber), however, material stockpiles will need to be managed and maintained to reduce fire risk. Different waste materials received will be stockpiled separately and stored within the labelled areas shown in Figure 2. Stockpiles will be kept according to the requirements laid out in the Environment Protection Licence (EPL), if specified. This will allow for safe and efficient emergency vehicle and personnel access on Site.

3.2.3 Fire-fighting systems

Dry powder ABE and CO₂ portable fire extinguishers are located throughout the site for initial fire response. Additionally, two mobile 60 L foam fire extinguishers are located outside of the workshop near to the 10,000 L diesel fuel tank. A fire hydrant system will be installed on Site, in accordance with AS 2419.1-2005 and NCC Specification E1.5. The system will consist of 6 twin head hydrants, operating at a minimum of 10 L/s each when up to 3 hydrants are flowing simultaneously and a minimum unassisted pressure of 519 kPa. The fire hydrant booster will be located near the Site entrance and facilitate a 30 L/s flow rate with a residual pressure of 700 kPa. There are also fire hose reels within the

concrete crushing facility and the workshop. The Site Environmental Impact Statement (EIS) details how fire hydrant water will be collected safely on Site.

3.2.4 Training

Staff will be trained in the use of portable and mobile fire extinguishers and fire emergency response upon induction. In the event of a fire emergency, all site personnel will be instructed to follow the emergency procedures detailed in Section 5.

3.3 Flood

The water management system has a proposed storage capacity of 200 kL and will collect surface water on Site into storage tanks. Ongoing monitoring of weather forecasts and warnings will increase the preparedness for flood and improve response effectiveness. The detailed flood emergency response is detailed in the Site Flood Emergency Response Plan (FERP).

3.4 Other natural events

Erosion will be controlled according to the Erosion and Sediment Control Plan (E&SCP) for the Site. Impacts from severe wind and storms will be predicted by ongoing weather monitoring throughout operation (as outlined in the FERP). If severe weather is predicted, the Site Supervisor will prepare to cease operations.

3.5 Hazardous materials

To prevent hazardous waste from entering the Site, the weighbridge operator will request information from each truck driver delivering waste to the Site. The weighbridge operator observes and records all loads of material entering the Site, including waste and other operational materials. The material is again inspected by the plant operator and Site workers when the material or waste is unloaded.

If illegal waste is found on the site, it is to be immediately isolated, and steps are taken to have it removed from the Site and taken to a waste facility approved to accept it. If the illegal waste is detected at the weighbridge, the truck is rejected from the Site, and an entry is made in the 'Rejected Loads Register'.

3.6 Dust

Dust generation will be managed by the operation and proper maintenance of the dust suppression sprinkler system, the wetting down of stockpiles, and the sweeping of trafficable, impervious surfaces while damp. All loads will be covered during transport, and low speed limits will be adhered to by all vehicles and plant on Site.

3.7 Safety equipment

Safety equipment and devices used to minimise risks to human and environmental health, and to contain or control pollution include fire extinguishers, first aid kits, spill kits and bunds, traffic control cones, barriers, signage and PPE. Safety equipment will be located in the Site workshop, with Site vehicles also equipped with additional emergency response equipment and materials. Regular inspections will be scheduled for these items, which should be serviced and maintained in accordance with the relevant standards and manufacturer's instructions. Regular training will also be carried out to ensure that all employees can operate the equipment.

4 Inductions and Training

The best and most effective method for minimising harm to all persons on the premises, including employees, visitors and subcontractors, is through education, training and provision of appropriate resources to control hazards. All persons working on the Site, employees and subcontractors, and persons visiting the premises, are required to attend an induction program. All employees and regular subcontractors must attend the regular toolbox meetings, where they are openly encouraged to raise issues of concern. Minimising harm also comes through development and training programs which employees are encouraged to commit to. Training often takes the form of on-the-job training of employees in the use of plant and equipment as well as reinforcement of the various management plans and systems in place. Employees, sub-contractors, and visitors will be provided with and instructed on the correct use of appropriate personal protective equipment.

Site inductions, toolbox talks and ongoing training will ensure personnel are familiar with emergency response procedures such that they understand potential hazards and risks in the workplace and are aware of their responsibilities in the event of an emergency.

The Site Supervisor or their delegate is responsible for the administration of materials and maintenance of records for all inductions and ongoing training. At a minimum, records of training will contain details of who facilitated and received the training, when the training was undertaken, and what the training involved.

Contractors and visitors to the site will also be subject to inductions and ongoing training as deemed appropriate by the Site Supervisor or their delegate. Details and copies of any relevant licenses, certificates and/or qualifications held by employees and contractors will also be recorded and maintained by the Site Supervisor or their delegate. It is the responsibility of all employees and contractors working on the site to work in a safe manner and to look after the interests of their fellow workers.

Inductions and ongoing training requirements should be routinely reviewed and revised as deemed appropriate by the Site Supervisor or their delegate. Throughout this process, considerations should be made for but not limited to changes in procedures and regulations, as well as any errors or deficiencies in job performance and in reporting.

Overall site management and compliance, as well as the activation, training and reviewing of the ERP is the responsibility of the Site Supervisor, with assistance from advisory managers, employees, and regular contractors. The Site Supervisor or their delegate will ensure that all employees read and understand the ERP. The Site Supervisor will also ensure all relevant persons are re-trained if the ERP is altered in a substantial way.

5 Emergency Response

Employees, contractors and visitors inducted to the site accept a duty of care and the responsibility to ensure that any accidents, hazards, and near misses are reported through the correct channels. During an emergency or hazard, they are obligated to follow procedures and authorised instruction, provided this does not place them at any additional risk. As such, they must commit to understanding the ERP and other emergency plans.

Any employee or contractor who suspects or confirms that an emergency has or is about to occur, shall immediately notify the Site Supervisor. In the event of an emergency, all Site operations are to stop until the emergency is controlled. If the emergency poses risk to human health or safety, the relevant emergency services should be contacted immediately. Emergency response will depend on the nature and severity of the hazard and will be enacted at the discretion of the Site Supervisor or the Project Manager. Specific recommended emergency response procedures are outlined in Section 6 below. Variations to the recommended emergency response may be authorised and carried out at the discretion of the Site Supervisor. Employees involved in an emergency are not permitted to leave the Site (or off-site emergency assembly point) unless approved to do so by management, or a representative of the Emergency Services (if in attendance). If the emergency requires evacuation from the Site, the evacuation procedure and route outlined in Sections 5.1 and 5.2 are to be followed.

Once the emergency has been controlled, the following will be assessed:

- Remaining hazards;
- Damage to any structures, plant or equipment; and
- Pollution, erosion and other environmental impacts.

5.1 Evacuation procedure

Once the ERP had been activated, the following steps must be followed:

1. The Site Supervisor will issue an evacuation warning over the radio to all site staff.
2. The Site Supervisor will issue an evacuation order over the radio to all site staff.
3. All personnel will follow the clearest possible route to the emergency assembly point identified in Figure 3.
4. Once assembled, the Site Supervisor will ensure all staff are accounted for.
5. Emergency Services will be contacted as necessary.

5.2 Evacuation route

The recommended evacuation route is shown in Figure 3. However, Site conditions may require an alternative route to be followed. If the recommended evacuation route is blocked, site staff should take the clearest direct route to the emergency assembly point. The emergency assembly point is consistent with the emergency flood assembly point included in the FERP. If the emergency assembly point is inaccessible during an evacuation, the Site Supervisor is to immediately identify an alternative assembly point. The ERP will be reviewed and updated after activation to reflect actual Site conditions where necessary.

6 Hazard Types and Response

Hazard Type	Immediate response actions	Post-Hazard Reporting and Response Actions
Fuel spill or leak	1. If possible, shut off or contain the source of the leak. 2. Lay down spill control products or earth on hardstand surfaces (i.e. concrete or asphalt) to contain the spill (with priority given to preventing off-site escape of the spill). 3. If necessary and operationally possible, utilise mobile plant to construct a bund in the path of the fuel flow to capture and contain the flow (priority must be given to preventing the entry of hydrocarbons into waterways, particularly stormwater drains or the Bow Bowing Creek). 4. Take all steps to remove sources of ignition (i.e., electricals). 5. If ignition of the fuel spill is predicted, evacuation procedures (included in Section 5.1) should be followed immediately.	<u>Reporting:</u> • The Project Manager must be notified in the event of a fuel spill/leak. • If the spill results in material environmental harm (i.e., polluting land or a waterway), the appropriate regulator(s) must be notified. • If the fuel spill results in off-site impacts, neighbours and other relevant stakeholders must also be notified. <u>Response actions:</u> 1. Immediately isolate up any soils that came into contact with the fuel (and ensure it is disposed of at a licensed facility, along with spill containment materials). 2. Immediately carry out any remediation actions for waterways (offsite or on site) as directed by the regulator(s). 3. Immediately engage a suitable contractor to repair or replace the damaged fuel tank where necessary. 4. Review any relevant management plans or operational procedures regarding hydrocarbon handling, management, and procurement. 5. Submit any required reports to the appropriate regulatory authorities. 6. If required, undertake environmental monitoring. Investigate any subsequent increases in pollutant levels, in consultation with a qualified consultant.

Hazard Type	Immediate response actions	Post-Hazard Reporting and Response Actions
Chemical spill	1. Isolate/shut off the source of the chemical if possible. 2. All personnel are to leave the area if it is an enclosed space, and the chemical is likely to produce a hazardous vapour. 3. Lay down spill control products or use mobile plant to create an earth bund to contain the spill (with priority given to preventing off-site escape of the spill). 4. Use appropriate spill kit products where necessary. 5. Consult the MSDS for information on human and environmental toxicity and take appropriate actions, as directed by the Project Manager.	<u>Reporting:</u> • The Project Manager must be notified in the event of a major chemical spill (>20 L). • If the spill results in material environmental harm (i.e., polluting land or a waterway), the appropriate regulator(s) must be notified. • If the spill results in off-site impacts, neighbours and other relevant stakeholders must also be notified. <u>Response actions:</u> 1. Excavate and appropriately dispose of any soil or earth that came into contact with the chemical (if required). 2. Collect spill kit materials in a manner that takes into account to precautions outlined in the chemical MSDS. Dispose of the spill kit materials at a facility that is licensed to accept the waste. 3. If regulatory authorities were notified, carry out remediation actions, and submit follow up written report(s), if required. 4. Any damage to Site structures or equipment as a result of the spill will be repaired promptly. 5. If required, undertake environmental monitoring. Investigate any subsequent increases in pollutant levels, in consultation with a qualified consultant.

Hazard Type	Immediate response actions	Post-Hazard Reporting and Response Actions
Fire	- Emergency services should be called immediately if a fire is identified on Site. - The Site Supervisor will alert all personnel to the location of the fire via radio. - The Site Supervisor will initiate the evacuation protocols outlined in Section 5.1. - Fire extinguishers should only be used by trained personnel if safe to do so. - Follow all instructions from emergency services.	<u>Reporting:</u> - The Project Manager must be notified in the event of a fire. - If the fire threatens material environmental harm, the appropriate regulator(s) must be notified. - Neighbours and other relevant stakeholders must also be notified if the fire threatens to have off-site impacts. <u>Response actions:</u> - No personnel are to re-enter the Site until it is declared safe to do so by emergency services. - Any damage to Site structures or equipment as a result of the fire must be repaired prior to operations recommencing. - If regulatory authorities, neighbours or stakeholders were notified, carry out remediation actions, and submit follow up written report(s), if required.
Flood	- If flooding is predicted, all personnel are to be alerted and standby for further response instructions from the Site Supervisor. - All vehicles, mobile plant, equipment and hazardous substances are to be moved to higher ground in preparation. - If flood waters are identified on Site, the Site Supervisor will activate the FERP and initiate the evacuation protocols outlined in Section 5.1. - Emergency services will be contacted where necessary.	<u>Reporting:</u> - The Project Manager must be notified on activation of the FERP. - If material environmental harm is caused by flooding on-site (i.e., polluting land or a waterway), the appropriate regulator(s) must be notified. - If the impacts from the flooding on-site are predicted to have off-Site impacts, neighbours and other relevant stakeholders must also be notified. <u>Response actions:</u> - Personnel may return to Site only when permitted by management or emergency services. - Any damage to Site structures or equipment as a result of the flooding must be repaired prior to operations recommencing. - If regulatory authorities were notified, carry out remediation actions, and submit follow up written report(s), if required. - If required, undertake environmental monitoring to investigate any impacts, in consultation with a qualified consultant.

Hazard Type	Immediate response actions	Post-Hazard Reporting and Response Actions
Other natural events	1. If other natural/weather events such as severe erosion, storms or wind impact the Site, the Site Supervisor should alert all Site personnel to the hazard. 2. The Site Supervisor is to cease Site operations if they are deemed unsafe due to the impacts of the hazard. 3. Personnel should standby for further instruction. 4. Additional erosion, surface water and dust controls should be installed where necessary. 5. Emergency services will be called, and evacuation procedures will be followed where necessary (at the discretion of the Site Supervisor).	<u>Reporting:</u> • The Project Manager must be notified of any on-Site impacts (i.e., erosion, damages to site structures or equipment). • If material environmental harm is caused on Site due to the weather event (i.e., erosion and sediment on Site flowing into the waterway), the appropriate regulator(s) must be notified. • If the on-site impacts are predicted to have off-Site impacts, neighbours and other relevant stakeholders may also need to be notified. <u>Response actions:</u> 1. Assess on and off-site impacts of the hazard and respond accordingly. 2. Erosion, surface water and dust controls should be evaluated and repaired or replaced if no longer effective. 3. Any damages to Site structures or equipment should be repaired immediately. 4. If material environmental harm has occurred, remediation actions must be carried out immediately, and required reports submitted as directed by regulators.

Hazard Type	Immediate response actions	Post-Hazard Reporting and Response Actions
Vehicle Collision/Combustion	1. In the event of a vehicle or mobile plant collision on Site, emergency services must be called immediately. 2. The Site Supervisor should assess additional hazards caused by the collision (e.g., damage/instability to Site structures, risk of combustion) and instruct personnel and emergency services accordingly. 3. If further risk to human health and safety is predicted, the Site Supervisor will activate evacuation procedures.	<u>Reporting:</u> • The Project Manager must be notified of any vehicle or mobile plant collisions. • If material environmental harm is caused on Site due to the collision (i.e., fuel leak), the appropriate regulator(s) must be notified. • If the on-Site impacts are predicted to have off-Site impacts (i.e., a fire caused by the collision), neighbours and other relevant stakeholders may also need to be notified. <u>Response actions:</u> 1. Assess on and off-site impacts of the hazard and respond accordingly. 2. If evacuation was called, personnel may return to Site only when permitted by management or emergency services. 3. Any damage to Site structures or equipment as a result of the collision must be repaired prior to operations recommencing. 4. If regulatory authorities, neighbours or stakeholders were notified, carry out remediation actions, and submit follow up written report(s), if required.
Hazardous materials	1. If illegal waste is identified on-Site and the originator of the waste can be identified, the Site Supervisor must contact them and demand that the waste be removed. 2. Take any action required to minimise the risk of the waste contaminating soil, air, groundwater or surface water. 3. Implement dust suppression techniques where necessary. 4. Install signage or exclusion tape to minimise personnel contact with the hazardous material. 5. If the hazardous material can be identified, information should be sought in regard to the specific hazards posed and appropriate management.	<u>Reporting:</u> • The Project Manager must be notified if a hazardous material is identified on Site. • If the illegal waste is identified, or the hazardous material threatens material environmental harm, the appropriate regulator(s) must be notified. • Neighbours and other relevant stakeholders must also be notified if the material threatens to have off-site impacts. <u>Response actions:</u> 1. Ensure that the hazardous material is removed (along with any contaminated materials) and disposed of at a facility that is suitably licensed to receive the waste. 2. If regulatory authorities were notified, carry out any remedial actions, which may be required by the regulator(s). 3. Continue with dust suppression techniques as necessary. 4. If required, undertake environmental monitoring to investigate any impacts, in consultation with a qualified consultant.

6.1 Reporting

The Reporting Procedure below contains a simple flow chart guide for what types of reporting are required when an emergency occurs. All relevant internal contacts, as well as contact details for authorities and other stakeholders are included in Section 8.

Internal reporting should be completed any time an emergency occurs on Site. If material harm to the environment occurs, the appropriate regulator(s) should be notified. Neighbours and stakeholders may need to be notified if offsite impacts occur or are predicted as a result of the emergency.

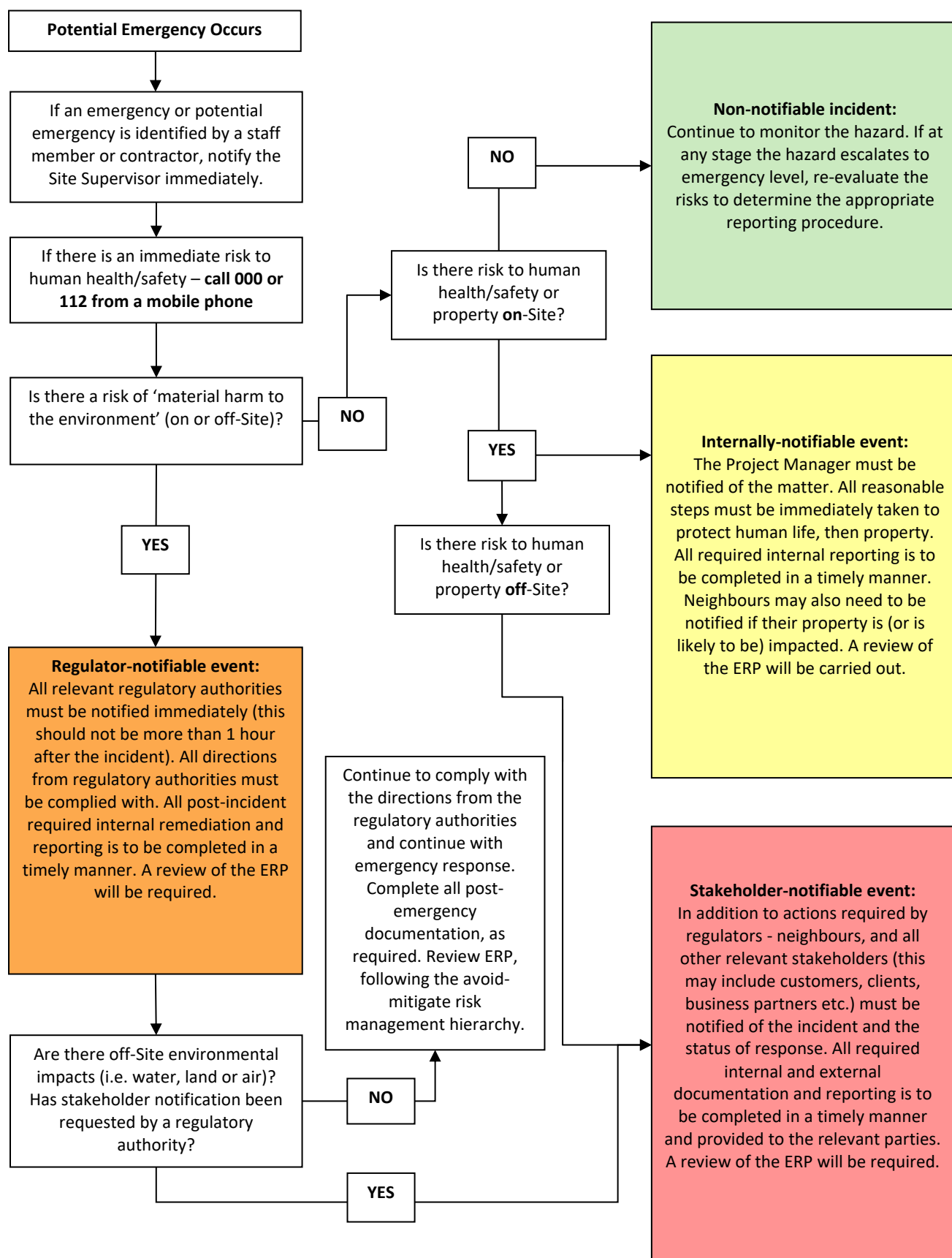
Following an emergency, the Site Supervisor is responsible for ensuring that all required information has been collected and all required reporting has been carried out. Information that should be recorded following an emergency, includes:

- the time, date, location, nature and duration of the event;
- personnel involved in the emergency;
- impacts that have occurred or are likely to occur;
- suspected cause of the hazard;
- actions taken to control the situation;
- proposed action(s) to prevent a recurrence of the event; and
- any other information that may be requested by regulatory authorities.

The Site Supervisor or their delegate will prepare a report that satisfies reporting requirements in a timely manner following a regulator-notifiable or stakeholder-notifiable event. Once this report has been reviewed and approved, it is to be forwarded to the relevant regulators, stakeholders and management authorities on behalf of the company. This is to occur within the timeframes set out by the relevant regulators. Any follow up information requested by the regulator(s) is to be authorised by the Site Supervisor and provided in a timely manner.

Emergency services will be contacted for any remaining hazards where necessary. Any damage will be repaired before the Site returns to operation. Relevant internal contacts, and authority and stakeholder contact details are included in Section 8 below.

7 Reporting Procedure



8 Contact Information

The notification protocol described below should be enacted as soon as practicable after any person on the premises becomes aware of an emergency. Firstly, call '000' if the hazard presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders. Following this, or if the hazard does not require any of these agencies to control or contain the hazard, notify the relevant authorities. Contact details for other relevant persons and organisations to be contacted in an emergency are summarised in Table 3. The contact details for surrounding receivers are included in Table 4.

Table 3: Contact details for persons and organisations relevant to emergency and emergency response.

Contact	Description	Contact information
Concrete Recyclers Project Manager (Anthony Males)	Contact in case of any emergency or potential emergency	0427 308 437
Emergency Services (Ambulance, Fire, Police)	To be contacted for time-critical life or property threatening emergencies	000 or 112 from mobile
State Emergency Service	Contact for assistance required in recovering from storm events	132 500
NSW Environment Protection Authority (EPA)	Main environmental regulator for sites with an EPL	131 555
Campbelltown City Council	Local government environmental regulator	(02) 4645 4000
NSW Ministry of Health	Public health authority	(02) 9391 9000
SafeWork NSW	WHS authority	13 10 50
Fire and Rescue NSW	Emergency services – flood hazards	1300 729 579 (or 000)

Table 4: Contact details for stakeholders and surrounding receivers that could be impacted by a potential emergency.

Contact	Address	Number
Sydney Cook Islands Seventh-day Adventist Church	9 Montore Rd, Minto NSW 2566	-
Rus Mining	5 Montore Road, Minto NSW 2566	02 8796 9800
Origin Energy LPG Sydney	26 Pembury Rd, Minto NSW 2566	133574
Foamco Industries PTY Ltd.	27 Pembury Rd, Minto NSW 2566	02 87969500

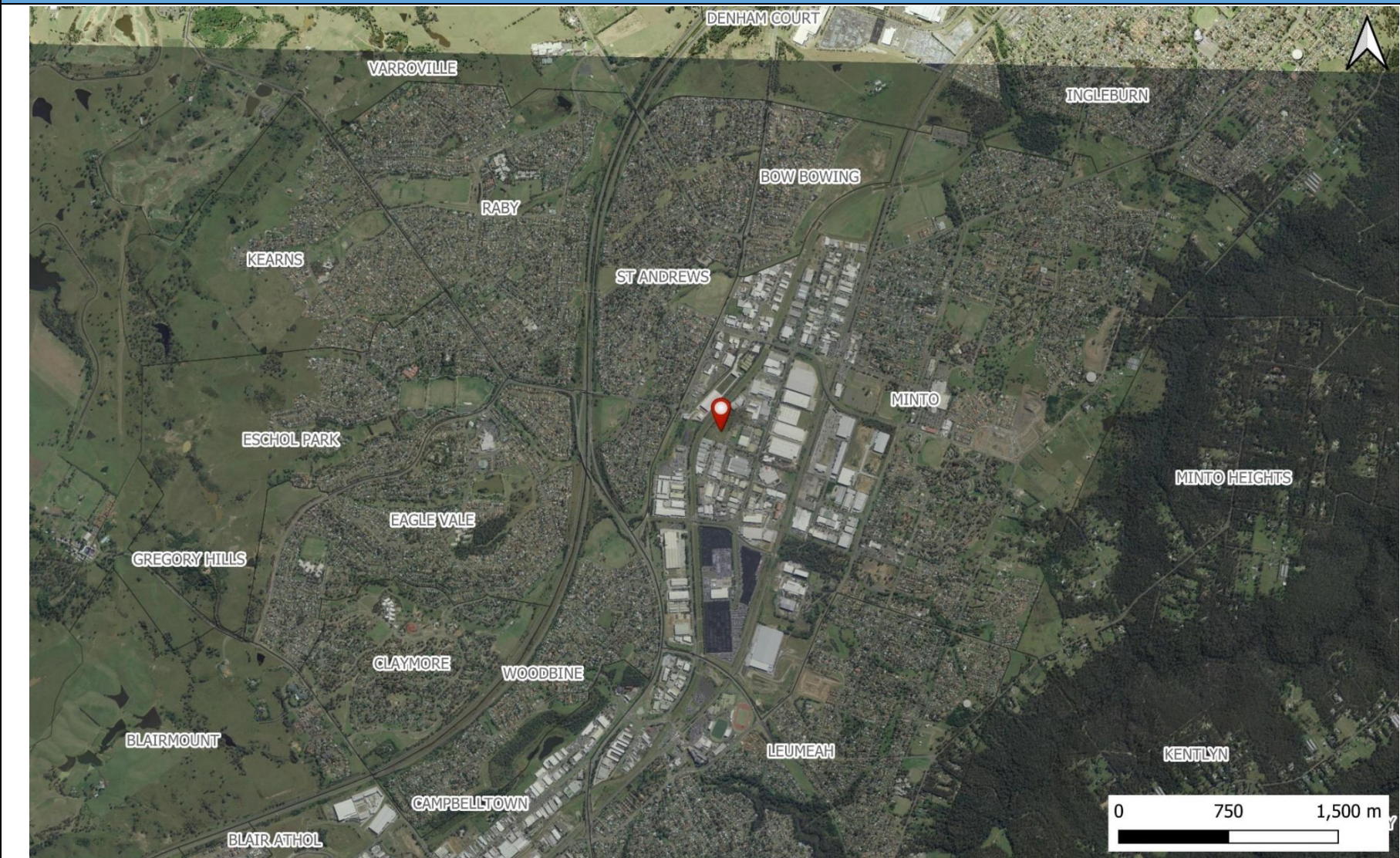
9 ERP review

This ERP details emergency response procedures that must be followed during operation of the proposed Resource Recovery Facility. We note that the proposed development has not commenced at the time this ERP has been prepared and will be reviewed once the development is complete. It will also be reviewed following an activation, to ensure response actions remain effective. A basic review of the ERP will involve the Site Supervisor, or relevant delegate conducting a review of all information in the plan, paying particular attention to the following elements:

- i. Site layout;
- ii. Relevant hazards;
- iii. Contact details; and
- iv. Evacuation routes.

The document is to be revised and re-issued following the review. The Site Supervisor or their delegate must ensure that all relevant persons are re-trained in the ERP following the review with a particular focus given to sections that have been changed.

Site locality



Drawn by:	KP	Report reference: 20220325CON_ERP	Key:	Red pin: Site
Date:	6/7/22	Image source: QGIS and Six Map overlay		

Figure 1: Site locality.

Site layout (proposed)

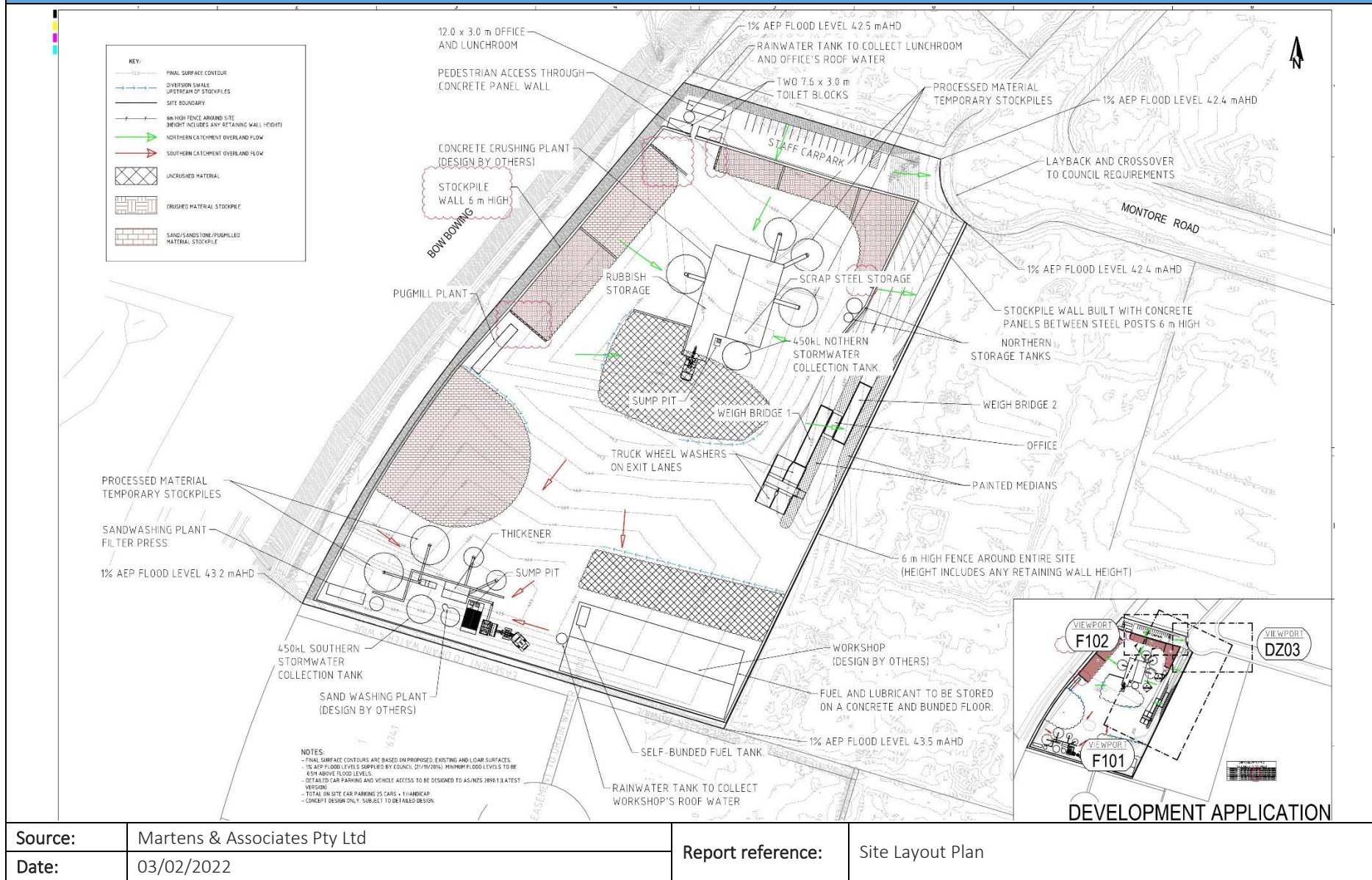


Figure 2: Site layout plan.

Site evacuation route



Drawn by:	KP	Report reference: 20220523CON_ERP	Key:	Refer to map legend.
Date:	6/7/22	Image source: QGIS with Nearmap overlay (dated 15/6/22)		

Figure 3: Evacuation route to emergency assembly point.

Complaints/Dispute Register

This register was last updated on [DATE].

Date	Time	Communication Method	Name	Subject	Details of Complaint/Dispute	Support Required	Corrective Action	Closure Notes