



Austral Bricks
Waste Management Plan
Brickworks Plant 2 Upgrade
(SSD 9601 - Modification 1)

174-181 Ferrers Road
Horsley Park, NSW

24 June 2021





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1. Introduction

1.1 Background

Land & Groundwater Consulting Pty Ltd (LG) has been engaged by Austral Brick Company Pty Ltd (Austral Brick) to prepare a Waste Management Plan (WMP) in support of SSD 9601 Modification 1 for the proposed Brickworks Plant 2 Upgrade located at 174-181 Ferrers Road, Horsley Park, NSW (hereafter referred as 'the site'). The site location is shown in **Figure 1**.

The site is Part of Lot 7 in Development Plan (DP) 1059698 which covers in its entirety an approximate area of 820,000 m². The proposed development will be on land that has been used until recently for the production and packing of bricks and ceramics.

LG understands that the WMP is required to support Modification 1 for the Brickworks Plant 2 Upgrade with the NSW Department of Planning and Environment (DPE). Modification 1 will comprise the refurbishment of the existing kiln with larger fans and ductwork, and extra burners to increase the capacity from 80 to 100 million bricks per annum a to 130 million bricks per annum. The site layout and proposed development are shown in **Figure 2**.

The existing kiln building to be refurbished will have an area of approximately 13,250 m². The new production building will have an area of approximately 11,350 m².

1.2 Objectives

As specified in the Secretary's Environmental Assessment Requirements (SEARs) for the proposed development, the objectives of the WMP are:

- To document the procedures that will be undertaken to manage the wastes generated as part of the development works;
- To provide details of the quantities and classification of waste and wastewater (if any) to be generated onsite;
- To provide details on waste storage, handling and disposal (including the location of waste storage and management facilities); and
- To provide details of the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-2021*.

2. Project Summary

2.1 Overview

The proposed development will be on land that has been used and is intended for on-going use for brick and ceramics manufacturing purposes, packing and distribution on a 24 hour, 7-day basis.

The development will accommodate the following areas of the site (refer **Figure 2**):

- The original SSD 9601 included:
 - Existing kiln to remain: Building area of 13,250 m².
 - New production building: Building area of 11,350 m².
 - The demolition of the existing production building will comprise the following areas of the site:
 - Part of existing production building: Building area of 6,865 m².
 - Existing electrical substation: Building area of 175 m².
 - Existing clay bins: Building area of 230 m².
- Changes to original SSD 9601 include:
 - 15 additional new car park spaces adjacent to production building.
 - New retaining wall adjacent to production building.
 - New scrubber pad: Area of 460 m².
 - New mezzanine office: Building area of 320 m².
 - New footing for relocated clay bins: Area of 900 m².
 - New hydrant pump room: Building area of 60 m².
- Additional works to original SSD 9601 include:
 - Upgrade of existing hardstand and new hardstand.
 - New entrance, weighbridge and gatehouse.

2.2 Project Schedule

The proposed development does not anticipate any extensive remediation, estate infrastructure and estate landscaping works.

The most significant waste to be generated by the proposed development is anticipated to be demolition waste, which will be generated from the demolition of the existing production building, electrical substation and clay bins. However, demolition bricks or concrete will either be used as recycled material or disposed offsite accordingly.

Other significant waste to be generated by the development is anticipated to be construction waste, which will be generated during the following development construction stages:

- Bulk and detailed earthworks to create building pads;
- Construction of production building structures and related amenities across the site; and
- Construction of lead-in services including electricity, gas, sewer and potable water.

Demolition, construction and operational waste will be collected in skip bins located within the existing kiln and production building (refer **Figure 3**) as well as adjacent to new scrubber pad, new entrance and gatehouse (refer **Figure 4**). Waste storage and management facilities will comprise colour coded recycling bins, which will be utilised to dispose off any packaging waste. During operational activities recycling and garbage bins will be located within the Loading Dock Areas (allocated for the existing kiln and production building) and collected by a regulated waste contractor.

3. Waste Regulatory Framework

3.1 Protection of the Environment Operations Act 1997

Wastes in NSW are classified for disposal or transport into categories. It is the responsibility of those who generate the waste to classify it into groups that pose risks to the environment and human health facilitates their management and appropriate disposal.

All material to be removed from the site (including associated activities such as classification) will be undertaken in strict accordance with the requirements of the POEO Act 1997. Such requirements include:

- Ensuring waste is classified appropriately and in accordance with relevant guidelines;
- Waste materials are disposed of to appropriately licensed facilities; and
- Other materials are removed to facilities lawfully able to accept such materials.

3.2 Waste Avoidance and Resource Recovery Act 2001

The Waste Avoidance and Resource Recovery (WARR) Act 2001 establishes the waste hierarchy to ensure that resource management options are considered against the following priorities:

1. Avoidance – actions to reduce the amount of waste generated and undertaking activities;
2. Resource Recovery – which includes reuse, reprocessing, recycling and energy recovery, consistent with the most efficient use of the recovered resources; and
3. Disposal – an “end-of-pipe” option that must be carefully undertaken to minimise any negative environmental outcomes.

The objectives of the WARR Act 2001 include:

- To encourage the most efficient use of resources;
- To minimise the consumption of natural resources and the final disposal of waste by encouraging the avoidance of waste and the reuse and recycling of waste;

- To ensure that industry shares with the community the responsibility for reducing; and
- To ensure the efficient funding of waste and resource management planning, programs and service delivery.

3.3 Protection of the Environment Operations (Waste) Regulation 2005

The Regulation encourages the recovery of resources from waste by issuing both general and specific resource recovery exemptions. Where no general exemption is available for the intended use, a specific exemption may be issued after an application is made to the NSW EPA. Specific exemptions are not publicly available.

The Regulation makes requirements relating to non-licensed waste activities and waste transporting. The proposed works on the site will not require to be licensed. Section 48 of the Regulation requires that wastes are stored in an environmentally safe manner. It also stipulates that vehicles used to transport waste must be covered when loaded.

The Regulation exempts certain waste streams from the full waste tracking and record keeping requirements. Waste tracking is required only for industrial and hazardous wastes. However, these are not anticipated to be present on the site based on the use of the immobilisation approval. Provision is provided in the Regulation for the NSW EPA to approve the immobilisation of contaminants in waste.

3.4 Better Practice Guidelines 2012

The NSW EPA (2012) *Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities 2012* promotes efficient waste minimisation and resource recovery for commercial and industrial facilities and is used as a benchmark document when assessing waste production rates within Australia.

Better practice waste management systems in commercial buildings may incorporate any, or all, of the following:

- Garbage services to manage residual wastes (those not collected by a dedicated recycling or organics collection service).
- Recycling services to manage dry recyclable materials. These materials may vary

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from building to building, but generally cover recyclable materials generated in a typical business, including office paper, cardboard, plastic film, metals and recyclable containers.

- Organics services to manage garden and food organics, which may include a bin-based collection system or onsite composting.
- Bulky waste services to manage bulky items, such as furniture and fit-out materials.
- Special waste services for items such as toner cartridges, batteries, fluorescent lights, mobile phones and chemicals.

3.5 Waste Avoidance and Resource Recovery Strategy 2014 - 2021

The NSW Government's priority areas and actions for waste avoidance and resource recovery is outlined in the Waste Strategy 2014-2021.

The six identified "key result areas" in the Strategy are:

- Key Result Area 1: Avoid and reduce waste generation
- Key Result Area 2: Increase recycling
- Key Result Area 3: Divert more waste from landfill
- Key Result Area 4: Manage problem wastes better
- Key Result Area 5: Reduce litter
- Key Result Area 6: Reduce illegal dumping

The Strategy also includes the following recycling targets (as relevant to the proposed works at the site)¹:

- Increased recycling of commercial and industrial waste from 57% (in 2010-11) to 70% by 2021-21; and

¹ NSW Waste Avoidance and Resource Recovery Strategy 2014-21, NSW EPA, December 2014.



- Increased recycling of construction and demolition waste from 75% (in 2010-11) to 80% by 2021-21.

3.6 Waste Classification Guidelines 2014

All wastes generated and proposed to be disposed offsite shall be assessed, classified and managed in accordance with the NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.

4. Estimated Waste

4.1 Demolition Waste

The estimated demolition waste quantities are summarised in **Table 1**. These estimates are based on the demolition of:

- Bricks from kilns to be recycled on-site and re-used for brickmaking.
- Steel wall sheeting and columns to be recycled.
- Asbestos roof sheeting to be disposed off-site to a licensed landfill.

Table 1 – Estimated Demolition Waste

Type of Waste Generated	Reuse	Recycling	Disposal	Method of on-site reuse, contractor and recycling outlet and /or waste depot to be used
	Estimate Volume (m ³) or Weight (t)	Estimate Volume (m ³) or Weight (t)	Estimate Volume (m ³) or Weight (t)	
Bricks/pavers	139 m ³ (kilns: bricks)			
Metal		55 m ³ (Steel)		Recycling Management Centre
Concrete		1000 m ³ (Steel)		Recycling Management Centre
Hazardous/special waste			94 m ³ (Asbestos)	Waste Management Centre
Total	139 m³	1,055 m³	94 m³	

4.2 Construction Waste

The estimated construction waste quantities are summarised in **Table 2**.

Table 2 – Estimated Construction Waste

Type of Waste Generated	Reuse	Recycling	Disposal	Method of on-site reuse, contractor and recycling outlet and /or waste depot to be used
	Estimate Volume (m ³) or Weight (t)	Estimate Volume (m ³) or Weight (t)	Estimate Volume (m ³) or Weight (t)	
Excavation Material	93,000 m ³ (Mainly clay)			
Timber		2 m ³ (Offcuts)		Recycling Management Centre
Concrete		100 m ³		Recycling Management Centre
Bricks/pavers	2 m ³			
Tiles			2 m ³	Waste Management Centre
Metal		4 m ³ (Offcuts)		Recycling Management Centre
Fixtures and fittings			2 m ³	Waste Management Centre
Packaging (used pallets, pallet wrap)		2 m ³		Recycling Management Centre
Containers (cans, plastic, glass)			2 m ³	Waste Management Centre
Paper/cardboard		4 m ³		Recycling Management Centre
Total	93,002 m³	112 m³	6 m³	

4.3 Operational Waste

The estimated weekly operational waste quantities are summarised in **Table 3**. These estimates are based on other similar sized facilities constructed in the local area.

Table 3 – Estimated Weekly Operational Waste

Area Description	Waste (tonnes)	Conversion Factor	Total Waste (m ³)
Garbage Waste	2	0.15	15
Cardboard	1	0.13	8
Paper	1	0.1	5
Plastic	2	0.156	13
Pallets	15	0.156	96
Total	-	-	137

5. Demolition and Construction Waste Reduction Plan

5.1 Waste Reduction Measures

Waste-type-specific reduction measures will be employed during demolition and construction stages, with the following specific procedures:

- Applying practical building designs and construction techniques;
- Appropriate sorting and segregation of demolition and construction wastes to ensure efficient recycling of wastes;
- Selecting construction materials taking into consideration to their long lifespan and potential for reuse;
- Ordering materials to size and ordering pre-cut and prefabricated materials;
- Reuse of formwork (where possible);
- Planned work staging;
- Reducing packaging waste on-site by returning packaging to suppliers where possible, purchasing in bulk, requesting cardboard or metal drums rather than plastics, requesting metal straps rather than shrink wrap and using returnable packaging such as pallets and reels;
- Careful on-site storage and source separation;
- Subcontractors informed of site waste management procedures; and
- Coordination and sequencing of various trades.

5.2 Beneficial Reuses

The anticipated beneficial reuses of construction waste are summarised as follows:

- Bricks will be recycled and reused onsite;
- Metal and timber offcuts will be recycled offsite or disposed offsite in an appropriate manner;

- All solid waste timber, concrete, tiles and rock that cannot be reused or recycled will be taken to an appropriate facility for treatment to recover further resources or for disposal to landfill in an approved manner;
- All asbestos, hazardous and/or intractable wastes are to be disposed of in accordance with SafeWork Authority and EPA requirements;
- Portable, self-contained toilet and washroom facilities will be provided at the site and will be regularly emptied and serviced by a suitably qualified contractor;
- Provision for the collection of batteries, fluorescent tubes and other recyclable resources will be provided onsite to enable offsite recycling;
- Drink container recycling should be provided onsite or these items sorted offsite for recycling at an appropriately licensed facility;
- All garbage will be disposed of via a council approved system; and
- Opportunities for materials exportation and reuse with other local construction operations will be investigated.

5.3 Waste Storage Locations

Waste storage locations will be accessible and allow sufficient space for storage and servicing requirements. These locations will also be flexible in order to cater for change of use throughout the development construction stages.

Where space is restricted, dedicated stockpile areas are to be delineated on the site, with regular transfers to dedicated skip bins for sorting. The positions of the designated waste holding areas on site will change according to building works and the progression of the development, but must consider visual amenity, OH&S and accessibility in their selection.

All waste placed in stockpile areas/skips for disposal or recycling shall be adequately contained to ensure that the waste does not fall, blow, wash or otherwise escape from the site. Appropriate siting of waste stockpile locations will take into account slope and drainage factors to avoid contamination of stormwater drains during rain events.

Waste/recycling storage locations will be assigned during demolition, construction and operational works and will provide adequate space to accommodate all waste and recycling bins (up to approximately 12 x 1,000 litre bins or equivalent receptacles) associated with the demolition and construction. Recycling bins must be accessible to



all demolition and construction employees and must be clearly sign posted and colour coded to ensure segregation of waste and recycling is effective. Waste containers are to be kept clean and in a good state of repair.

6. Operational Waste Reduction Plan

6.1 Waste Reduction Measures

Waste-type-specific reduction measures will be employed during development operation, with the following specific procedures:

- Provision of take back services to clients to reduce waste further along the supply chain;
- Re-work/re-packaging of products prior to local distribution to reduce waste arising;
- Review of packaging design to reduce waste but maintain 'fit for purpose';
- Investigating leased office equipment and machinery rather than purchase and disposal;
- Establish systems with in-house and with supply chain stakeholders to transport products in re-useable packaging where possible;
- Development of 'buy recycled' purchasing policy;
- Flatten or bale cardboard to reduce number of bin lifts required; and
- Providing recycling collections within each of the offices and tearooms (e.g. plastics, cans and glass).

6.2 Beneficial Reuses

The anticipated beneficial reuses of operational waste are summarised as follows:

- Cardboard, paper, plastic, glass, cans and pallets and containers will be reused/recycled offsite;
- Provision for the collection of batteries, fluorescent tubes and other recyclable resources will be provided on site to enable offsite recycling;
- All waste materials that cannot be reused or recycled will be taken to an appropriate facility for treatment to recover further resources or for disposal to landfill in an approved manner;

- Waste oil (if any) used in equipment maintenance will be recycled or disposed of in an appropriate manner; and
- Opportunities for materials exportation and reuse with other local industrial operations will be investigated. This will have two benefits: minimising energy through reduction of material reprocessing, encouraging material reuse.

6.3 Waste Storage Locations

Waste storage locations will be provided within the Loading Dock Areas (refer **Figure 3**) where the recycling bins, garbage skips, and cardboard and plastic bales will be stored prior to collection. Sufficient clearance will be necessary to enable collection vehicles to access the locations of bin storage. Where possible collection times should not coincide with peak operational delivery schedules however all areas identified will not interfere with operational truck movements.

The construction of locations for garbage storage are to comply with BCA (Building Code of Australia) requirements and Australian Standards.

Waste/recycling storage locations will be constructed of an adequate size to accommodate all waste and recycling bins and bales associated with the development. Recycling bins must be accessible to all employees and must be clearly sign posted and colour coded to ensure segregation of waste and recycling is effective.

Sufficient space will be provided for the segregation and storage of varying waste types including provision for the collection of fluorescent tubes, smoke detectors, e-wastes and other recyclable resources.

Sufficient space will also be provided for reuse items such as crates and pallets for occupational safety purposes.

Doors/gates to the waste storage locations will be able to be opened from the outside and wide enough to allow for easy passage of waste/recycling containers.

7. Waste Classification and Removal

7.1 Waste Classification

All liquid and non-liquid wastes generated during development construction works (if any) shall be classified in accordance with the requirements of NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.

Samples shall be collected by appropriately trained and experienced personnel from stockpiled or in-situ waste materials by the use of a hand trowel. The hand trowel shall be thoroughly decontaminated using phosphate free detergent and distilled water between each sampling location.

During the collection of soil samples, features such as seepage, discolouration, staining, odours and other indications of contamination should be noted on the field documentation.

Collected soil samples shall be immediately transferred to sample containers of appropriate composition (glass jars). Sample labels shall record job number; sample identification number; and date and time of sampling.

Sample containers shall be transferred to a chilled ice box for sample preservation prior to and during shipment to the testing laboratory. A chain-of-custody form should be completed and forwarded with the samples to the testing laboratory.

Soil samples shall be analysed by both a primary and secondary (independent check) laboratory, both of which shall be NATA accredited for the required analyses. In addition, the laboratories will also be required to meet the environmental consultant's own internal quality assurance requirements.

The analytical data shall be compared against the waste criteria contained in NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste* for heavy metals, TRHs, BTEX, PAHs, total pesticides (OCPs and OPPs), PCBs and TCLP in benzo(a)pyrene, lead and nickel. A summary of the criteria is provided in **Table 3**.

Table 3 – Summary of Waste Classification Criteria

Contaminant	General ¹	Restricted ¹	General ²	Restricted ²	General ³	Restricted ³
	CT1	CT2	SCC1	SCC2	TCLP1	TCLP2
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(µg/L)	(µg/L)
Heavy metals						
Arsenic	100	400	500	2000	5.0	20
Cadmium	20	80	100	400	1.0	4
Lead	100	400	1500	6000	5	20
Mercury	4	16	50	200	0.2	0.8
Nickel	40	160	1050	4200	2	8
BTEX						
Benzene	10	40	18	72	0.5	2
Toluene	288	1152	518	2073	14.4	57.6
Ethylbenzene	600	2400	1080	4320	30	120
Xylenes (total)	1000	4000	1800	7200	50	200
Petroleum Hydrocarbons						
C₆-C₉	N/A	N/A	650	2600	N/A	N/A
C₁₀-C₃₆	N/A	N/A	10000	40000	N/A	N/A
PAHs						
Benzo(a)pyrene	0.8	3.2	10	23	0.04	0.16
PAHs (total)	N/A	N/A	200	800	N/A	N/A
Pesticides (total)	N/A	N/A	250	1000	N/A	N/A
PCBs (total)	N/A	N/A	<50	<50	N/A	N/A

Notes:

1. Contaminant threshold values for classifying waste by chemical assessment without the leaching (TCLP) test (Table 1) – NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.
2. Specific contaminant concentration (SCC) values for classifying waste by chemical assessment (Table 2) – NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.
3. Leachable concentration (TCLP) values for classifying waste by chemical assessment (Table 2) – NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.

7.2 Waste Transporting

All wastes removed from the site shall be transported in accordance with relevant road and transportation regulatory requirements. Where required (depending on the classification of the wastes), appropriately licensed transport contractors shall be used.

The appointed transporters shall be responsible for ensuring they are appropriately licensed to:

- Carry the particular type of waste; and
- Transport the materials to an appropriately licensed facility.

Where the waste is classified as Restricted Waste or Hazardous Waste, the transporter is required to carry (subject to a number of exceptions) appropriately completed waste data forms with each load, and provide a copy to the waste facility to which the waste is taken.

8. Limitation Statement

This report has been prepared for use by Austral Brick Company Pty Ltd who commissioned the works in accordance with the project brief only and has been based in part on information obtained from other parties. The advice herein relates only to this project and all information provided should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose. Additionally, this report has been based on data documented by other parties in previous reports.

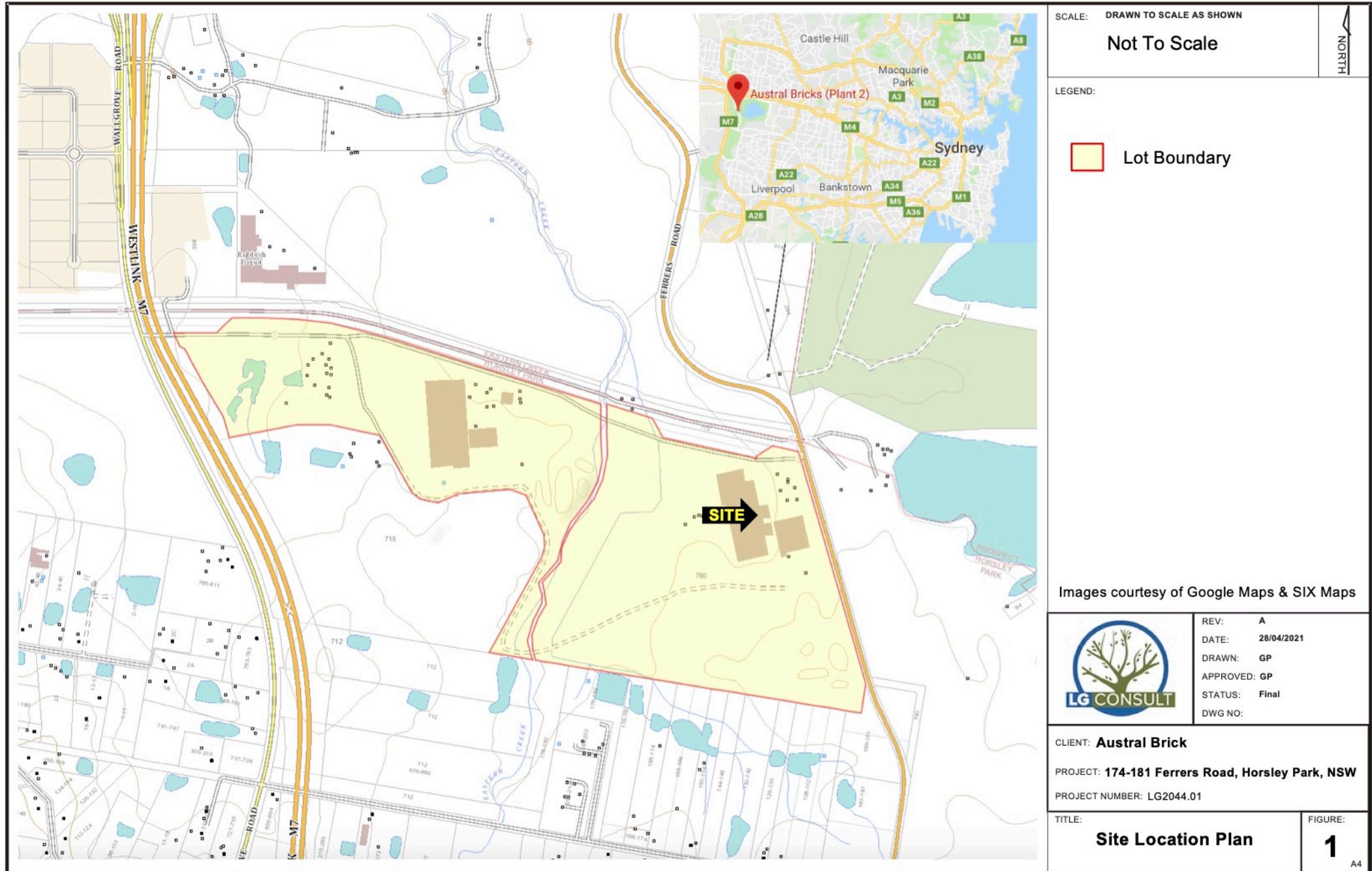
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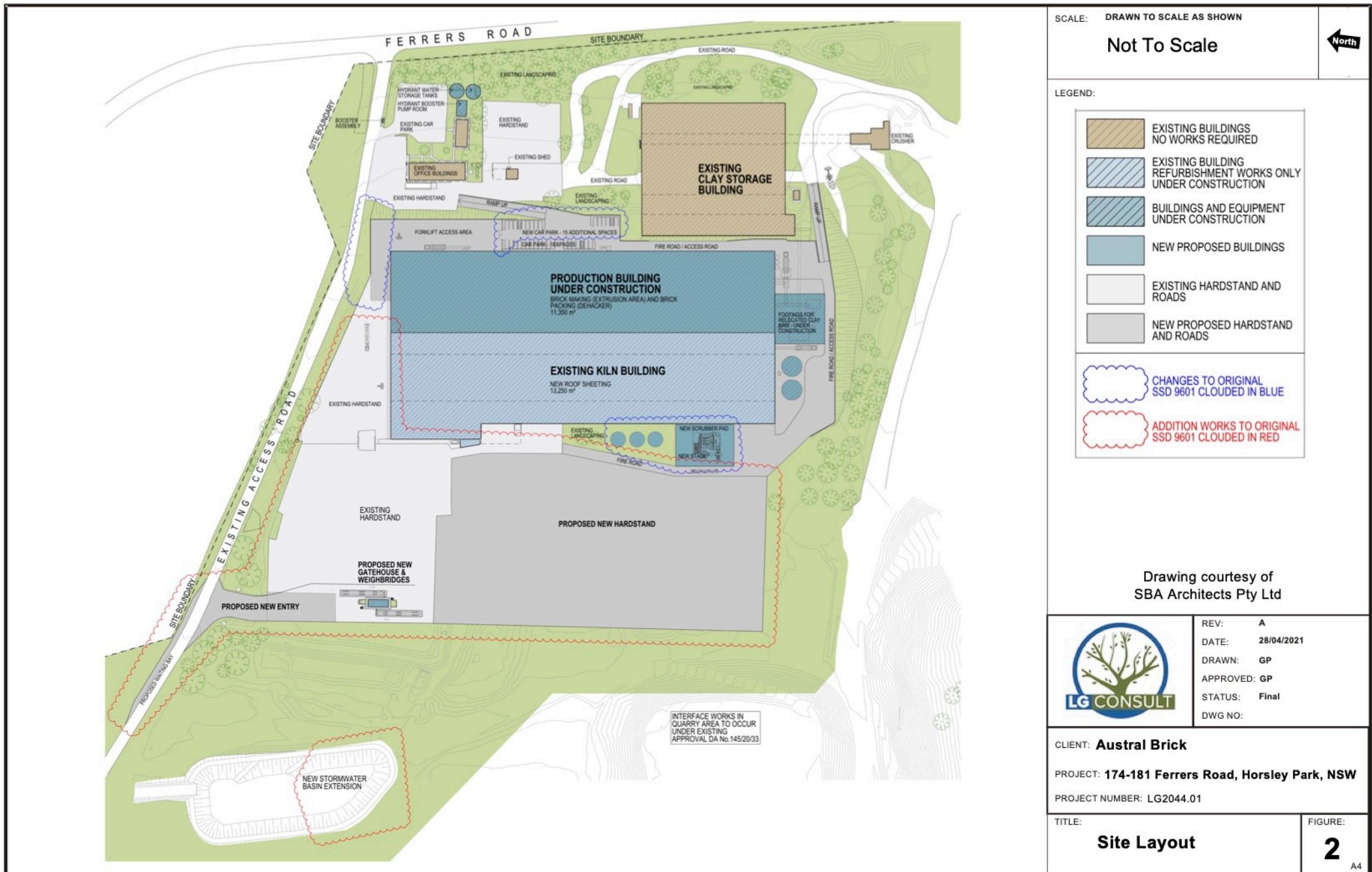
Waste quantities and sources are based on documents made available to LG consult by Austral Brick Company Pty Ltd.

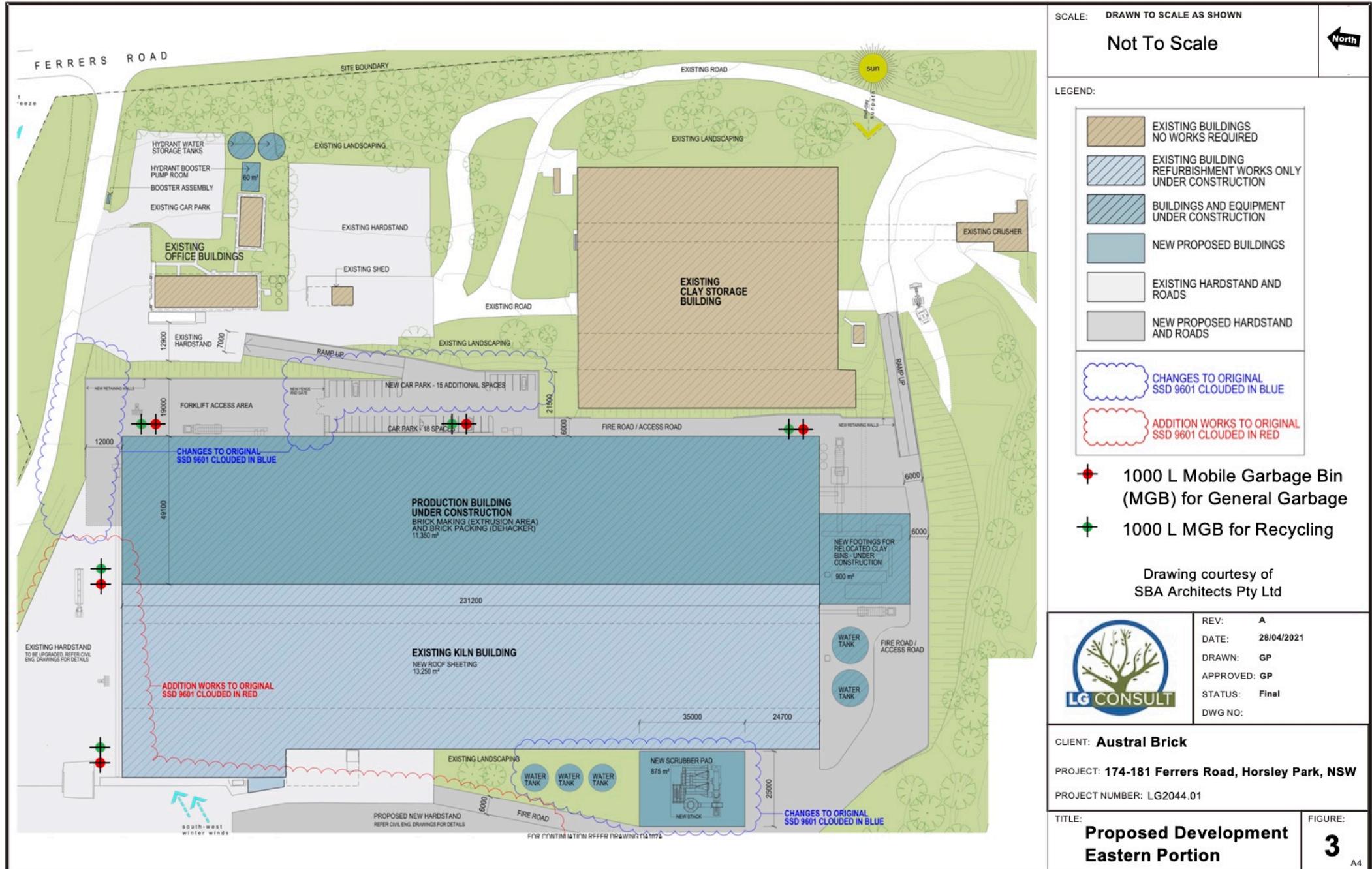
This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein.



Figures





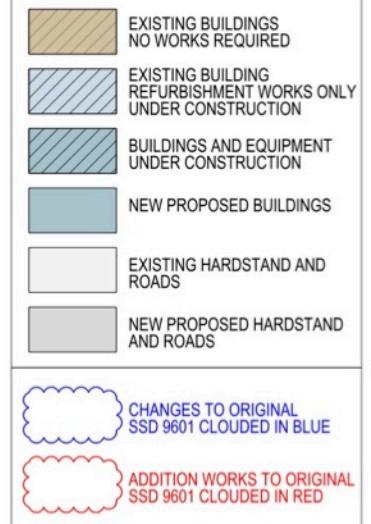


SCALE: DRAWN TO SCALE AS SHOWN

Not To Scale



LEGEND:



• 1000 L Mobile Garbage Bin (MGB) for General Garbage

• 1000 L MGB for Recycling

Drawing courtesy of
SBA Architects Pty Ltd



REV: A
DATE: 28/04/2021
DRAWN: GP
APPROVED: GP
STATUS: Final
DWG NO:

CLIENT: Austral Brick

PROJECT: 174-181 Ferrers Road, Horsley Park, NSW

PROJECT NUMBER: LG2044.01

TITLE: **Proposed Development
Western Portion**

FIGURE: **4**
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