

13 July 2021

William Hodgkinson
Team Leader
Industry Assessments
Department Planning, Industry & Environment

Via E-mail

RE: Mayfield West Waste Facility-Mod-1 (SSD-7698-Mod-1)
Request for additional information

Dear Mr Hodgkinson,

In response to your RFI letter (09/07/2021), please find below further information addressing the Department's issues.

- *Condition B32 of SSD 7698 requires all waste unloaded at the public hand unloading area to be unloaded and stockpiled underneath the awning or within the main processing building. However, p16 of the Modification Report dated May 2021 states the hand unloading activities are approved outdoors with a small awning at the northern end of the main processing shed. To address this:*
 - *Describe how waste is currently unloaded at the public hand unloading area and where this waste is currently stored on site.*

Benedict response: As per the wording of Condition B32, the main processing shed is currently used for hand unload activities. The reference to 'northern end' should have said southern end. Any source separated hand unload heavies can be unloaded externally in the heavies area at the external end of the northern end of the main shed and the lights and mixed loads are sorted in the southern end of the main shed.

Effectively the majority of hand unload occurs in the main shed (unless there was a source separated heavies load) at the southern end but the purpose of this application is to separate the light and heavy vehicle traffic and create two different shed locations which will improve on site safety risk.

Currently, co-mingled hand unload waste is unloaded inside the southern part of the main processing shed onsite. The co-mingled hand unload waste is then transferred to separated waste stockpile bays at the northern part of the main processing shed. Separated soils would be transported using a front-end loader from the main processing shed to the external waste processing area. Heavy waste (soils, bricks, concrete, tiles, rail ballast, etc) would be processed through the main plant onsite and stockpiled in the external waste processing area. Timbers would be stockpiled in the external waste processing area and shredded on a campaign basis to produce mulch. All products are tested in accordance with the relevant EPA Resource Recovery Order prior to dispatch.

Processed co-mingled waste such as cardboard, ferrous and non-ferrous materials are stored in skip bins in the main processing shed and require further processing off-site.

Some co-mingled waste is not acceptable for recycling. This residual waste is currently stockpiled in the main processing shed prior to being disposed at a licensed landfill facility.

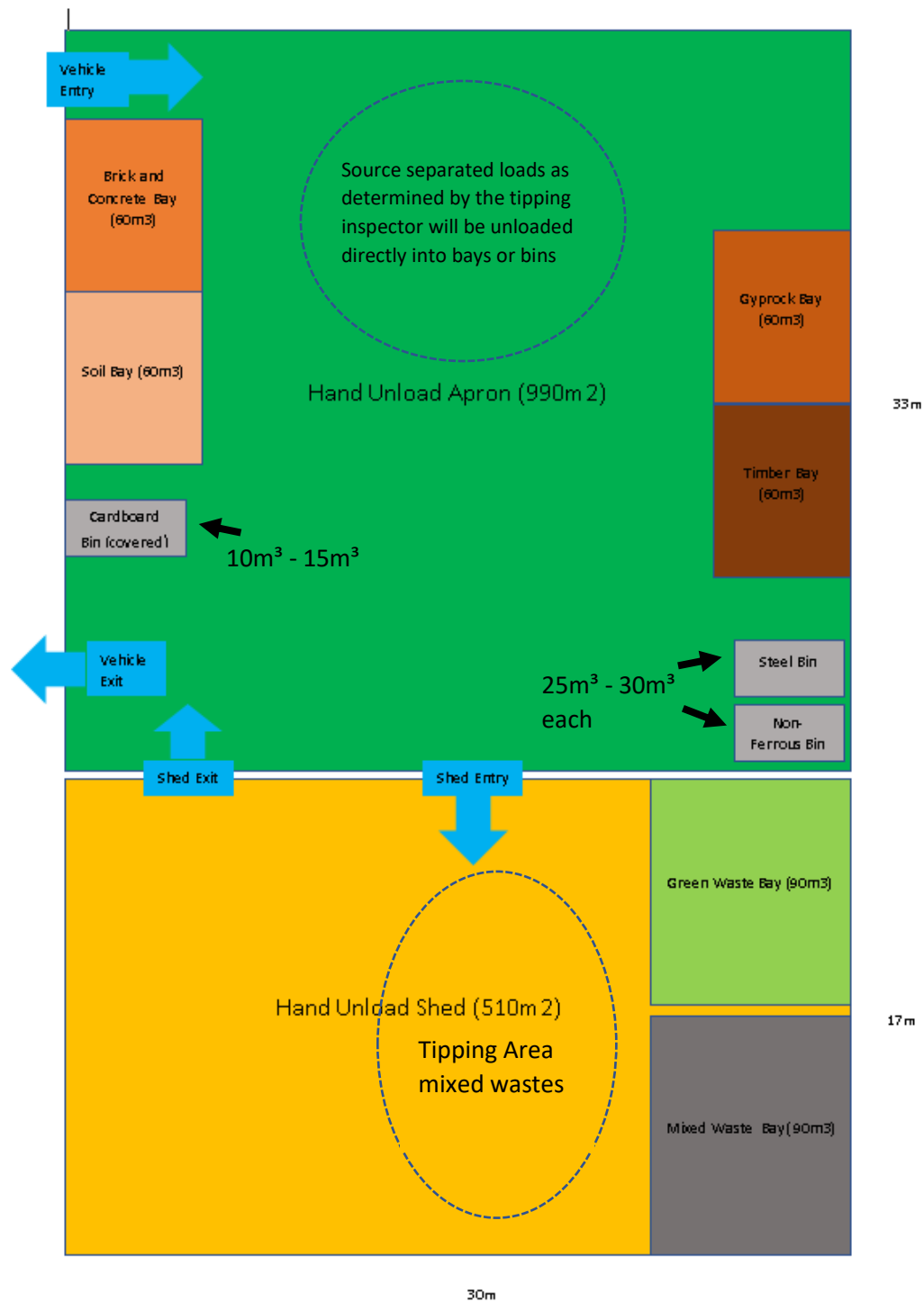
- *Provide further justification for the proposed external storage for material from the public hand unloading area.*

Benedict response: The proposed modification will allow the existing enclosed shed and external storage bay area to be used by members of the public in light vehicles to access recycling services for waste materials, keeping them away from the larger, heavy vehicles and site machinery.

By hand unloading loads of waste that have already been separated at the source directly into the bays or bins as outlined in 'Figure 5 Conceptual layout plan for proposed hand unload shed and apron area' will be far more efficient and safer for the site, reducing the amount of heavy machinery movements from inside the proposed hand unload shed to the main processing shed onsite to then separate co-mingled waste in the main processing shed onsite.

- *Show where hand unloading would take place in Figure 5 Conceptual layout plan for proposed hand unload shed and apron area of the Modification Report.*

Benedict response: See diagram.



- Clarify where light waste will be stored and provide the storage capacity for the bins in the apron area for cardboard, metals and nonferrous metals.

Benedict response: Light waste will be stored in the shed Mixed Waste bay coloured grey on the Figure 5 Conceptual layout plan for proposed hand unload shed and apron area'. The sizing for the bins will be:

- Cardboard: 10 – 15m³ bin
- Metals (ferrous): 25 – 30m³ bin
- Non-ferrous: 25 – 30m³ bin

- Provide a copy of the EMM advice to support section 5.2.2 of the Modification Report.

Benedict response: The advice in Section 5.2.2 was provided via email from EMM Consultant Scott Fishwick. The email received is attached at the end of this letter.

- Provide an updated Development Layout Plan (Appendix A of SSD 7698)

Benedict response: See revised Development Layout Plan attached to this response.

- Provide an updated list of management and mitigation measures, to replace Appendix B of SSD 7698, including but not limited to:

- A tipping inspector for the hand unload areas (p 23 of the Modification Report)
- The FEL will not operate in the hand unload shed while customers and light/heavy vehicles are in the shed hand unloading (p 6 of the letter dated 28 June 2021)
- Public hand unloading shed to be fitted with internal dust suppression (p 16 of the Modification Report).

Benedict response: Please see attached the updated list of management and mitigation measures (Appendix B). On the current list, some points have been removed and replaced as they are not in line with this proposed application and the above points have been added to the list:

- **Removed:** General: A public hand unloading area has been established outside of the northern end of the main processing shed to separate contractor and public tipping for safety reasons. Only light vehicles and trailers are permitted in the public hand unloading area. No heavy vehicles are permitted in this area.
- **Replaced with:** General: A dedicated public hand unloading area has been established in the small shed and adjacent apron area in the southern part of the site to separate contractor and public tipping for safety reasons. Only light vehicles and trailers are permitted to unload in the public hand unloading area.
- **Added:** The FEL will not operate in the hand unload shed while customers and light/heavy vehicles are in the shed building, hand unloading.

- **Removed:** Rubbish and light waste: All light waste (including light waste within co-mingled waste) will be tipped inside the main processing shed.
- **Replaced with:** Rubbish and light waste: All light waste (including light waste within co-mingled waste) will be tipped inside the main processing shed or hand unload shed.
- **Added:** General: A tipping inspector will be present in the hand unload area at all times while customers are in the hand unload areas.
- **Added:** General: Dust control measures will be used in the public hand unloading areas when necessary

If you have any further questions, please do not hesitate to contact me.

Regards,

Alycia Campbell
Environmental Compliance Manager
0437 468 258

Alycia Campbell

From: Scott Fishwick <sfishwick@emmconsulting.com.au>
Sent: Tuesday, 22 June 2021 3:26 PM
To: Alycia Campbell
Cc: Ewen Mckenzie
Subject: RE: Newcastle Modification

Hi Alycia,

I've provided a more robust discussion on the matter than was originally provided to Ewen. Hopefully this all makes sense and can be shaped into a response to DPIE from your end.

Again, apologies for the mix-up on the referenced air quality impact assessment in the previous response.

If you need anything further on this, please let me know.

Cheers,
Scott

DPIE Comment: The previous assumption was based on 25% of the total heavy waste processing and stockpiling area (26,800m²) having wind erosion potential at any one time. Wind erosion was one of the highest contributors to air quality criteria based on the revised air quality assessment (Appendix G of the Applicant's RtS for SSD 7698). The description provided under section 5.2.2 does not align with the revised air quality assessment.

Response: Firstly, it is acknowledged that the previous information incorrectly referenced the emissions inventory presented in the original AQIA (Ramboll Environ 2016) rather than the emissions inventory RTS Refined Dispersion Modelling letter (Ramboll Environ 2017). This response references Ramboll Environ 2017.

The following steps were taken to review the implications for the proposed increase in stockpiling area to potential wind erosion emissions:

- The emissions for wind erosion were extracted from the modelled emissions inventory presented in Table 1 of Ramboll Environ 2017 with the following steps:
 - o As stated in Ramboll Environ 2017, 25% of the total heavy waste processing and stockpiling area (26,800 m²) has wind erosion generation potential at any given time. This equates to 6,700 m².
 - o A 50% emission control was applied to wind erosion emissions to account for water sprays.
 - o Emission factors of 850 kg/ha/year (TSP), 425 kg/ha/year (PM₁₀) and 63.8 kg/ha/year (PM_{2.5}) were applied, corresponding to the USEPA AP-42 wind erosion emission factor (Chapter 11.9).
 - o However, when the emissions presented in Table 1 of Ramboll Environ 2017 are back calculated, the corresponding area in the wind erosion calculations is 6,225 m², which is 25% of 24,900 m². There is a therefore a slight discrepancy between the emission calculations and assumptions listed in Ramboll Environ 2017.
 - o From the emissions inventory presented in Table 1 of Ramboll Environ 2017, wind erosion emissions equate to 7% of total annual TSP emissions, 13% of total annual PM₁₀ emissions and 12% of total annual PM_{2.5} emissions.
- The emissions for wind erosion presented in Ramboll Environ 2017 were increased to account for the proposed increase in potential stockpiling area. Based on input provided by Benedict, this equates to 2,000 m² for external stockpiling and 1,000 m² for inside/outside hand unloading of trucks. This combined amount is added to the total heavy waste processing and stockpiling area (26,800 m²), equating to a total of 29,800 m². Applying the assumption of 25% for active wind erosion at any given time, this equates to an erodible area of 7,450 m².
- Annual emissions from wind erosion only from Ramboll Environ 2017 (based on 6,225 m²) and increased wind erosion area (based on 7,450 m²) were quantified and compared as follows in Table 1:

Table 1 – Annual wind erosion emissions comparison

Annual wind erosion emissions	TSP (kg/year)	PM ₁₀ (kg/year)	PM _{2.5} (kg/year)
Wind erosion (Ramboll Environ 2017)	264.6	132.3	19.8
Increased wind erosion emissions	316.6	158.3	23.7
Relative increase in wind erosion emissions	19.7%	19.7%	19.9%

- In order to incorporate the increased wind erosion emissions presented in the Table 1, the annual emission totals presented in Table 1 of Ramboll Environ 2017 were altered by subtracting the wind erosion emissions (row 1 of the Table 1 above) and adding the increased wind erosion emissions (row 2 of the Table 1 above).
- The total annual emissions from Ramboll Environ 2017 (6,225 m²) and with the increased wind erosion area (7,450 m²) are presented and compared in the following:

Table 2 – Annual site emissions comparison

Annual emissions totals	TSP (kg/year)	PM ₁₀ (kg/year)	PM _{2.5} (kg/year)
Ramboll Environ 2017	3,559.6	1,028.8	163.6
Inventory with increased wind erosion	3,611.6	1,054.8	167.5
Relative increase in total emissions	1.5%	2.5%	2.4%

- It can be seen that, relative to the emissions inventory that was modelled in Ramboll Environ 2017, the proposed increase in stockpiling area represents an increase of 1.5% for TSP, 2.5% for PM₁₀ and 2.4% PM_{2.5}.

DPIE Comment: The figures provided in tables under section 5.2.2 of the modification report do not match Table 1 of the Appendix G of the Applicant's RtS for SSD 7698 and it is not clear how the 'MOD with increased wind erosion area' figures have been calculated and the tables appear to show more than 50% increase in annual concentrations from those predicted in the revised air quality assessment..

Response: As stated, the incorrect AQIA was referenced (Ramboll Environ 2016 vs Ramboll Environ 2017) in the original response to DPIE. Please refer to the previous response for corrected emission calculations.

DPIE Comment: There is no assessment of cumulative or incremental air quality impacts against the relevant criteria.

Response: As stated above, the calculated increase in annual emissions associated with the increase in stockpiling area is 1.5% for TSP, 2.5% for PM₁₀ and 2.4% PM_{2.5}. From an air quality modelling perspective, this is considered a negligible amount and revised dispersion modelling has not been undertaken for the increased emissions inventory.

To provide an indication of the likely change in site-only incremental impacts, the calculated increase in annual emissions for TSP, PM₁₀ and PM_{2.5} has been applied to the predicted impacts presented in Table 5 of Ramboll Environ 2017. In the dispersion modelling completed for Ramboll Environ 2017, the wind erosion emissions were released proportionally to the hourly wind speed conditions in the model, with higher emissions coinciding with higher wind speeds (which also coincide with enhanced atmospheric dispersion conditions). Therefore, directly upscaling the model predictions by the increase in annual emissions is considered conservative.

The upscaled model predictions are presented in Table 3, and show negligible change in incremental concentrations from those presented in Ramboll Environ 2017. Equally, the resultant change in cumulative (increment + background) air quality impacts would be negligible from those presented in Table 6 of Ramboll Environ 2017.

Table 3 – Upscaled facility-only incremental concentrations and deposition rates

Assessment location	Upscaled incremental concentration (µg/m ³) or deposition rate (g/m ² /month)					
	Annual average TSP	24-hour average PM ₁₀	Annual average PM ₁₀	24-hour average PM _{2.5}	Annual average PM _{2.5}	Annual average dust deposition
R1	0.1	0.6	0.1	0.4	<0.1	<0.1
R2	0.1	0.7	0.1	0.5	<0.1	<0.1

Table 3 – Upscaled facility-only incremental concentrations and deposition rates

Assessment location	Upscaled incremental concentration ($\mu\text{g}/\text{m}^3$) or deposition rate ($\text{g}/\text{m}^2/\text{month}$)					
	Annual average TSP	24-hour average PM_{10}	Annual average PM_{10}	24-hour average $\text{PM}_{2.5}$	Annual average $\text{PM}_{2.5}$	Annual average dust deposition
R3	0.1	1.0	0.1	0.5	<0.1	<0.1
R4	0.1	1.3	0.1	0.8	<0.1	<0.1
R5	0.1	1.3	0.1	0.8	<0.1	<0.1
R6	0.1	1.1	0.1	0.6	<0.1	<0.1
R7	0.1	0.9	0.1	0.6	<0.1	<0.1
R8	0.1	0.8	0.1	0.6	<0.1	<0.1
R9	<0.1	0.6	<0.1	0.4	<0.1	<0.1
R10*	2.9	5.7	1.3	3.6	0.7	0.3
R11*	1.3	3.7	0.5	2.2	0.2	0.1
R12*	0.5	2.5	0.2	1.4	0.1	<0.1
R13*	1.3	4.2	0.7	2.5	0.3	0.1
Criteria	90	50	25	25	8	2

Note: * = industrial receptor

DPIE Comment: Please provide an assessment of air quality impacts that demonstrates there would be minimal environmental impacts through the addition of external storage areas and include any management and mitigation measures proposed.

Response: As presented above, the corrected emission calculations and upscaled model predictions indicate that the proposed increase to materials storage at the Mayfield site would have a negligible change on annual particulate matter emissions from the facility and the resultant air quality impacts in the surrounding environment, as presented in Ramboll Environ 2017.

Scott Fishwick

Associate – National Technical Leader, Air Quality

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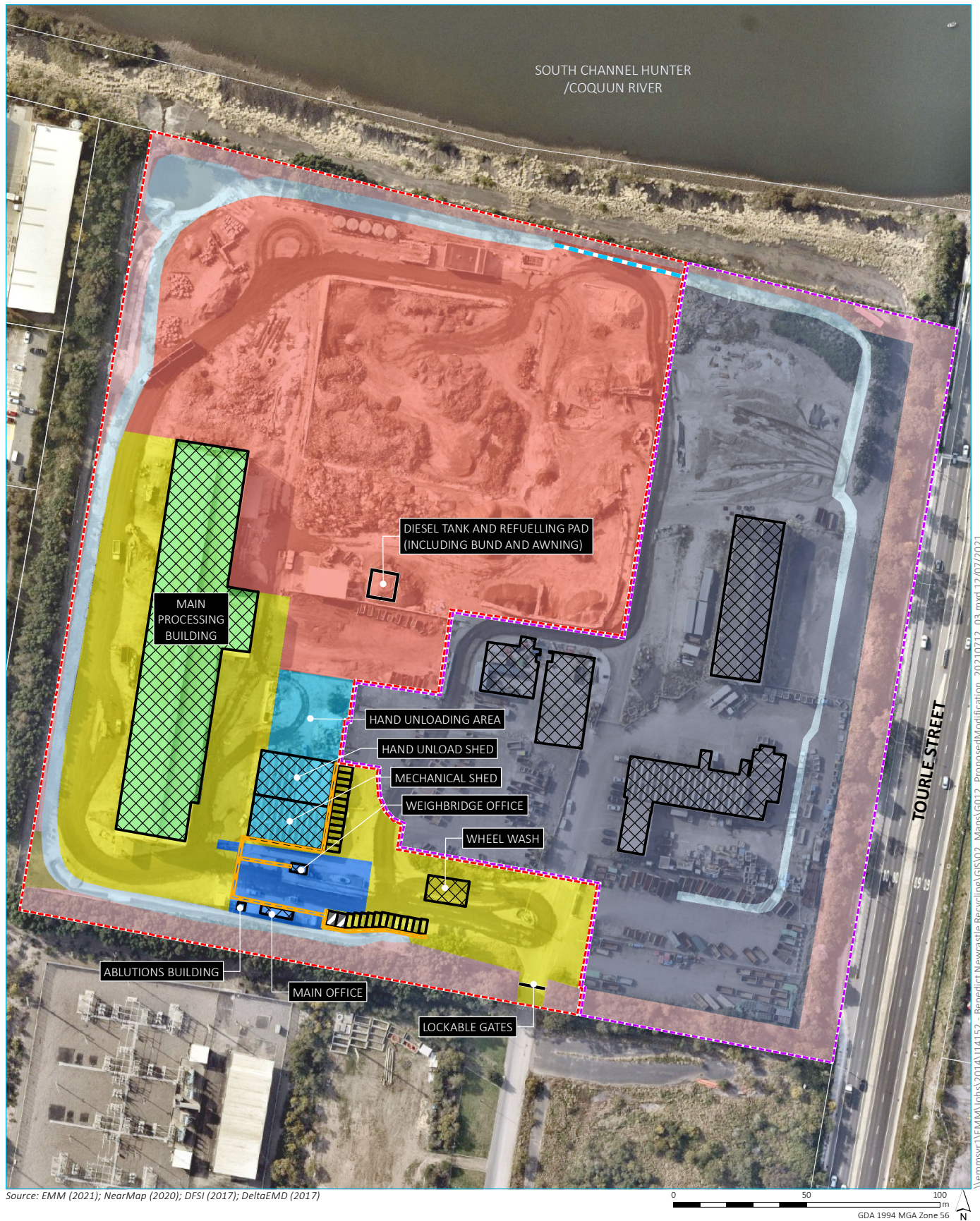
From: Alycia Campbell <Alycia@benedict.com.au>
Sent: Tuesday, 15 June 2021 4:47 PM
To: Scott Fishwick <sfishwick@emmconsulting.com.au>
Cc: Ewen McKenzie <Ewen@benedict.com.au>
Subject: RE: Newcastle Modification

CAUTION: This email originated outside of the Organisation.

No problem, thankyou.

Regards,

Alycia Campbell



KEY

- MWRF Site
- Area excluded from SSD7698 Approval
- Cadastral boundary
- Recycling facility
- Segregated heavy waste processing and stockpiling area
- Main processing shed
- Hand unloading area
- Weighbridge and office area

- Access and general use area
- Other site components
- Remnant driveway
- Area to remain unsealed and vegetated
- Perimeter drain and final sedimentation basin
- Ancillary activities area
- Buildings

- Subsurface drain
- Parking and walkways
- Car space - regular
- Car space - disabled
- Walkways

Mayfield West Recycling Facility - proposed modification

Figure 1

Appendix B

Applicant's Management and Mitigation Measures

Key issue	Management measure
General	<p>A public hand unloading area has been established in the small shed and adjacent apron area in the southern part of the site to separate contractor and public tipping for safety reasons. Only light vehicles and trailers are permitted to unload in the public hand unloading area.</p> <p>The FEL will not operate in the hand unload shed while customers and light/heavy vehicles are in the shed hand unloading.</p> <p>A tipping inspector will be present in the hand unload area at all times while customers are in the hand unload area.</p> <p>Dust control measures will be used in the public hand unloading areas when necessary.</p> <p>Currently unsealed areas within the site that are not part of the 'Area to remain unsealed and vegetated' will be progressively sealed with concrete or asphalt.</p> <p>Trucks delivering or picking up stored items will access the storage compounds on sealed access roads.</p> <p>Lighting in the southern car park will be designed to comply with AS 1158.</p>
Rubbish and light waste	<p>All light waste (including light waste within co-mingled waste) will be tipped inside the main processing shed or hand unload shed.</p> <p>The access road between McIntosh Drive and the recycling facility site will be inspected daily to ensure that there is no rubbish is left along the access road (most likely food and beverage waste from drivers).</p> <p>The site boundary fences will be inspected daily and any wind-blown light waste within the site will be removed and sent to the main processing shed.</p> <p>Any rubbish found along the access road between McIntosh Drive and the recycling facility site will be removed promptly.</p>
Security	<p>The site's security measures will continue to be implemented, including deployment of guards when the site is not operating (including at night), use of remotely accessed security cameras and maintenance of fences and gates.</p>
Air quality	<p>The following management measures will continue to be implemented to minimise air quality impacts:</p> <ul style="list-style-type: none"> all existing sealed/hardstand areas will be retained; water sprays will be used over any other bare or unsealed surfaces that have not yet been sealed and have the potential to generate unacceptable amounts of dust; all vehicle movements will be restricted to designated routes marked out by appropriate signage and fencing using sealed internal roads; access to unsealed areas will be prevented; water sprays will be used at stockpiles, crushing and screening plants and during material handling as necessary; a wheel wash in the weighbridge area will be used if required to clean truck tyres to prevent mud or sediment being carried to and deposited on the access road (and public roads); and existing sheds will be used to undertake particulate generating activities where possible. <p>Irrigation sprays will only used when the surface of a stockpile is dry and irrigation will be ceased when the surface is wet.</p> <p>Dust and odour control procedures, including current monitoring requirements, are detailed in the EMP (see EIS Appendix D).</p>
Greenhouse gases	<p>The following management measures will continue to be implemented to minimise greenhouse gases emissions:</p> <ul style="list-style-type: none"> on-site equipment will be regularly maintained and serviced to maximise fuel efficiency; vehicle kilometres travelled on-site will be minimised; energy efficiency will be progressively reviewed and, where necessary, changes will continue to be implemented throughout the life of the operations.
Noise	<p>The following management measures will continue to be implemented to minimise noise emissions:</p> <ul style="list-style-type: none"> operations will be limited to the hours and types of operation approved; and machinery will be correctly operated and maintained.

Key issue	Management measure
	<p>Regular noise monitoring is conducted by the Site Leading Hand/Supervisor and any noise complaints received are referred to the Site Leading Hand/Supervisor and to the Site Manager.</p> <p>The two mobile screens in the segregated heavy waste processing and stockpiling area, the crusher/screen and the shredder will be operated no further south than 130 m from the northern site boundary.</p> <p>The two mobile screens in the segregated heavy waste processing and stockpiling area will not be operated simultaneously with the crusher/screen and shredder.</p>
Traffic	<p>Site generated traffic will continue to be formally directed to continue to travel only via Steel River Boulevard and McIntosh Drive when travelling within the Steel River estate.</p> <p>Benedict Recycling will continue to maintain the access road between McIntosh Drive and the Recycling Facility site in a fit and proper condition and to a suitable standard, repairing it when required at no cost to Ausgrid. This will include repairing any minor areas of surface rutting using 50 mm hot mix asphalt.</p> <p>Trucks will not be allowed to queue on the access road between McIntosh Drive and the Recycling Facility site.</p>

Water	<p>The perimeter drain, installed prior to Benedict Recycling occupying the site, captures runoff from all active areas of the site.</p> <p>The site soil and water management system includes:</p> <ul style="list-style-type: none"> • prevention of runoff from external areas discharging across the site; • a perimeter drain with seven sedimentation basins; • a final sedimentation basin with outlet controls; • sock filters treating runoff prior to discharge into the perimeter drain; • flocculation of stored water in the basins as necessary; and • pumping water in the final sedimentation basin, after testing, to the discharge chamber to reduce water levels in the basin prior to forecast rain if required. <p>Only commercially available non-toxic flocculants will be used at the site.</p> <p>Actions that will continue to be implemented to prevent impacts to water include:</p> <ul style="list-style-type: none"> • water is used for dust suppression but is not used for product processing; • there are no significant excavations within the site; • regularly maintaining sock filters; • removal of sediment from the sedimentation basins when the sediment depth is greater than 200 mm; • recycling of sediment if of appropriate quality or disposal to a facility approved to accept contaminated sediment; • water in the final sedimentation basin is tested before a controlled discharge and, unless it overflows, is only be discharged if it meets water quality trigger values; and • water in the sedimentation basins is used for dust suppression to minimise the mains water required; • groundwater is not used. <p>The following actions will be taken as part of the proposal:</p> <ul style="list-style-type: none"> • the trees will be removed from the perimeter drain and the perimeter drain will be sealed; • the final sedimentation basin will be sealed; • additional storage volume will be provided as part of the works to seal the drain and final sedimentation basin volume; • the sedimentation basins in the perimeter drain will be upgraded. Poorly graded rock (50–150 mm diameter) will be used to form the sedimentation basin dams in the perimeter drain. The top of each dam will be approximately 0.5 to 1.0 m wide with the crest level approximately 0.3 m below the top of the perimeter drain to allow overflow into the next basin when the storage capacity is exceeded; • the sealed perimeter drain and final sedimentation basin will be inspected monthly to ensure that vegetation is not growing through the seal. If vegetation is found to be growing through the sides of the drain or basin, it will be removed and the seal repaired; • the segregated heavy waste processing and stockpiling area will be sealed with concrete or asphalt with the sealed area extending to the perimeter drain; • a bund will be erected around the segregated heavy waste processing and stockpiling area directing all runoff from the area to the perimeter drain; • any material in the sealed segregated heavy waste processing and stockpiling area that is not in a stockpile will be removed using a front end loader bucket; • the sealed segregated heavy waste processing and stockpiling area will be routinely swept using a sweeper; • bunds will be erected to direct surface runoff away from unsealed areas; and • concrete will be applied to the floor of the main processing shed where liquids may infiltrate to groundwater, eg through cracks. <p>The following actions will be taken in respect to water discharge:</p> <ul style="list-style-type: none"> • If water levels are between about 2 m and 3 m from the base of the sedimentation basin and meets water quality trigger values, water will be manually discharged from the final sedimentation basin using the outlet valve to maintain a freeboard in the final sedimentation basin. • Water in the final sedimentation basin will be tested before a controlled discharge and unless it overflows, it will only be discharged if it meets water quality trigger values. • When the basin is discharging, daily samples of the discharging water will be collected from the final basin outlet pipe and will be analysed in accordance with the discharge monitoring program.
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Key issue	Management measure
	<ul style="list-style-type: none"> • A water level gauge will be installed in the final sedimentation basin. <p>A Surface Water Monitoring and Mitigation Plan will be prepared that details:</p> <ul style="list-style-type: none"> • meteorological monitoring; • water level monitoring; • validation monitoring; • routine monitoring; and • sediment monitoring. <p>It will provide trigger values and responses, including treatment of site runoff prior to discharge and contingency measures.</p>
Soils and contamination	<p>No further ground excavation is anticipated so contaminated soil will not be disturbed. However, should excavation be required, the SMP for Subsurface Disturbance Activities (EIS Appendix E) will be implemented.</p> <p>The following measures will be implemented to prevent site activities exacerbating contamination of the site:</p> <ul style="list-style-type: none"> • plant and equipment will be maintained to prevent hydrocarbon leaks; • plant maintenance will only occur in sealed areas where spills, should they occur, will be contained and cleaned up immediately using a spill response kit; • a spill response kit will be deployed next to maintenance activities; • vehicles parked in the storage compounds will be parked on sealed areas; and • maintenance activities that may result in the loss of fluids will be conducted within a shed with a sealed floor and at least 5 m from the nearest open doorway. <p>The diesel tank will be installed in accordance with Australian Standards and will incorporate the following measures:</p> <ul style="list-style-type: none"> • Prevention: <ul style="list-style-type: none"> – overfilling of tanks will be prevented through gauging or monitoring of the tank's contents; – hoses used for transfer of diesel will be regularly inspected; – tanks, vents and fittings will be inspected regularly and valves will be regularly overhauled (at periods not exceeding 10 years); and – there will be regular inspections of the tank and surrounds and any liquid inside the bunded areas will be removed as soon as practicable following established procedures.
	<ul style="list-style-type: none"> • Protection: <ul style="list-style-type: none"> – the diesel tank will be self-bunded (with a capacity of 10% more than the tank's capacity); – the bund will be large enough to contain a spillage in accordance with the requirement of AS1940 para 5.8; – the bund drain valve will be kept closed and locked except during supervised drainage, and a sign will be placed to display the need to keep the drain valve closed and locked; – the tank will be enclosed by colourbond (or similar) walls to prevent leaks in the site of the tank spraying outside of the bund; – diesel pumps will be designed such that the discharge pressure cannot exceed design limit of pump or piping in the case of dead heading (shut-off at the pump discharge); – an emergency shut-off device will be provided on each pump; – provision will be made to quickly shut off the flow of liquid from the storage tank to a consuming device in an emergency. The shut off valve will comply with para 6.3.3 in AS1940, including resistance in a fire; and – diesel pumps will be designed such that the discharge pressure cannot exceed design limit of pump or piping in the case of dead heading (shut-off at the pump discharge). • Refuelling: <ul style="list-style-type: none"> – mobile plant will be refuelling within a bunded area with runoff from within the bund reporting to a oil-water separator; – the refuelling area will be covered by an awning so that rainwater does not enter the refuelling area; – there will be a diesel spill kit stored at the bowser; and

Key issue	Management measure
	<ul style="list-style-type: none"> – in the case of a spill, used absorbent material will be disposed at an appropriately licensed waste facility.
Visual	<p>As part of the construction of the recycling facility, the following management measures were implemented to minimise potential visual impacts to the surrounding area:</p> <ul style="list-style-type: none"> • <i>Casuarina sp.</i> were planted along the northern boundary and the northern section of the western boundary of the site to mitigate visual impacts from viewpoints to the north, north-east and west; and • rubbish from around the site boundaries was removed. • Litter is removed from the site on a regular basis and a number of litter control measures are listed within the EMP (EIS Appendix D). • Irrigation pipes have been installed and screening vegetation will be watered if required to maintain healthy growth. • Screening vegetation will be visually inspected and additional trees will be planted to ensure effective screening if required.