8 December 2016

Recycling & Recovery

Susan Fox
Department of Planning & Environment
Level 22, 320 Pitt Street
Sydney NSW 2001

Dear Susan,

RE: Further response to submissions – Wetherill Park Resource Recovery Facility SSD7267

Please find below SUEZ' response to further submissions from the following agencies regarding the Wetherill Park Resource Recovery Facility (WPRRF) SSD7267:

- NSW Environment Protection Authority (EPA)
- Fairfield City Council (FCC)
- Fire and Rescue NSW (FRNSW)

SUEZ received the submissions from the Department of Planning & Environment (DPE) on 8 November 2016.

1 NSW EPA

The NSW EPA provided the following comments in their letter dated 8 November 2016:

The EPA has reviewed the Response to Submissions and is generally satisfied with the information provided, however has identified that odour emissions from the proposed truck trailer area east of the transfer station building were not sampled in the Environmental Impact Statement nor were any mitigation measures provided to address potential fugitive odours from this area.

Trailers used for transport of putrescible waste parked in the proposed area are likely to be a source of odour particularly if the trailers are open/walk in floor style. Unless transfer trailers are parked within an enclosed building, are free of waste residue or are sufficiently airtight with a continuous rubber seal then they should have been included in odour modelling for the premises.

The EPA advises that it cannot provide General Terms of Approval for the Proposal until the Applicant addresses this deficiency.

SUEZ Response

The approach undertaken by SUEZ is to provide a "worst case" assessment of potential odour impact to cater for any fluctuations in operations. The revised air quality assessment provided as part of the Response

to Submissions Report (Golders, 2016) incorporates the following conservatisms and is intended to represent the a cumulative "worst case" scenario:

- Two additional modelling scenarios were undertaken in response to EPA comments on the Environmental Impact Statement: EPA scenario and the worst case scenario, with small differences between them
- Full putrescible waste was assumed and the full pit area is utilised (or nearly full, for the EPA scenario) as well as allowing for stockpiling (two 3 x 3 metres stockpiles) adjacent to the pit
- The highest odour emission rate of 10 samples gather from six putrescible landfills across NSW was adopted as the emission rate for putrescible waste used in the model
- The model has not included any attenuation effects due to any existing odour controls
- The model has not included any attenuation effects due to building walls, including the presence of a high blocking wall separating the WPRRF from the adjacent receptor
- The modelling assumes that the worst case conditions occur every hour, which is highly unlikely to occur

Regarding the truck parking area, SUEZ agrees that while the trailers are not airtight, the outsides of the trailers are cleaned on a fortnightly basis by a specialist contractor in accordance with the SUEZ Wetherill Park Environmental Management Plan (EMP) which removes any dirt and debris on the outside. In addition, the trucks have covers which reduces the area exposed to only a small portion of the container area. Operationally, the trucks would not be on site for most of the day and would only be parked overnight, with majority of the time being onsite not overlapping with the working hours of adjacent commercial / industrial properties.

Furthermore, the distance between the transfer station and the truck parking area is only approximately 50 metres. The impact of this short term odour source would be covered by the conservatism applied in the latest round of odour modelling which demonstrates significantly less than 2OU at residential properties.

SUEZ is committed to continue its current truck wash requirements as well as general housekeeping to maintain the site.

2 Fairfield City Council

FCC provided the following comments in their email dated 1 November 2016.

Flooding Issues:

Appendix A includes a detailed Flood Impact Assessment, which was undertaken using Council's Developer Agreement process. The applicants have modelled the base and proposed case, and provided flood height and velocity differences.

After reviewing the results, Council's Catchment Branch is satisfied that the impact to flood levels will be kept within the proponents site and complies the Flood Effects section of Schedule 6 of Chapter 11 of the DCP. It is noted that the the driveways at the rear of the property have over 1m depth of floodwater in the 100 year ARI, and these areas should be not be used as an evacuation route during times of flooding.

Environmental Management:

According to the RTS, all indicative amounts of oils, solvents, etc are given in Appendix M of the Environmental Impact Statement (EIS). Bunding is to be designed in accordance with the relevant Australian Standard and internal drainage will be directed to the existing onsite waste water treatment system 'if required'. Bunding of the first flush detention tank is to be designed as per the relevant Australian Standard. No details of any proposed bunding or drainage have been presented. Leaving these details for the 'detailed design of the project' is not acceptable to Councils Environmental Management Section (EMS).

The use of the existing washbay as a wheel wash can be conditioned.

Management of the volumes of putrescible waste at the premises is addressed in the response through statements regarding the predictability of waste delivery from Council and commercial sources preventing this waste from remaining at the site for more than 24 hours.

It states that the EIS contains a commitment to prepare an Operational Environmental Management Plan (OEMP) describing measures to maintain the site in a clean and tidy state. Given that the amount of putrescible waste to be processed by the site is to increase from 10,000 tonnes to 140,000 tonnes per annum, further detail is required on the methods for managing waste deliveries to prevent wastes being stored onsite for more than 24 hours, potentially causing odour issues. It is noted that the EPA expects areas contaminated with putrescible waste to be washed down at least daily. The response document states that this wash-down is proposed to occur weekly.

Disposal of wastewater via the Trade Waste agreement with Sydney Water Corporation can be conditioned.

A SEPP 33 Risk Screening Report was submitted with the EIS. While this did not specifically consider the offensiveness of the proposal, odour issues are addressed in other documents.

EMS Recommendations

Based on the submitted information, EMS considers that the following information should be sought prior to further comment:

- *Full details of any spill management/ bunding for the proposed workshop and the 'first flush' detention tank;*
- *Given that the amount of putrescible waste to be processed by the site is to increase from 10,000 tonnes to 140,000 tonnes per annum, further detail is required on:*
- *The methods for managing waste deliveries to prevent wastes being stored onsite for more than 24 hours;*
- *The updated Operational Environmental Management Plan (OEMP), including any supplementary documentation;*

SUEZ Response

SUEZ notes FCC's comments and would not use the driveway at the rear of the property as evacuation route during times of flooding.

SUEZ commits to provide design of bunding to relevant Australian Standards. We have attached the SUEZ

Standard Operating Procedure (SOP) 078 - Bund Construction and Maintenance in Attachment A to this letter which provides details regarding the bunding requirements that would be adopted during design, as well as construction and maintenance requirements.

Regarding the comment of waste storage on site for over 24 hours, it is an existing licence condition (O 6.3) that putrescible waste would not be stored for more than 24 hours on site. Waste is tracked in and out based on weighbridge records and this is reportable to the NSW EPA. Any changes would need to be approved by the NSW EPA.

The site Environmental Management Plan, as well as relevant Standard Operational Practices (SOP) are provided in Attachment C of this letter. Relevant SOPs include:

- SOP007 Spill response
- SOP065 Odour Management

The above documents are regularly updated upon review by SUEZ safety team and the SUEZ environment, quality and safety system is subject to internal and external audits. SUEZ sites are certified as meeting a range of national and international certifications including ISO 14001 Environmental Management, ISO 9001 Quality Management and AS 4801 Occupational Health & Safety Management.

3 Fire Rescue NSW

FRNSW provided the following comment in their email dated 25 October 2016:

In particular, FRNSW has reviewed section 3.9 – Hazard and Risk of the RTS which relates specifically to the comments provided within the FRNSW letter dated 24 May 2016 (TRIM Document Number D16/43000). The RTS indicates that both FRNSW recommendations one (1) and two (2) have been agreed to by SUEZ.

Given the agreement for upgrades to both the fire hydrant and sprinkler systems, FRNSW provides one additional comment:

1. Given the possible increases in contaminated fire water as the result of the proposed fire hydrant and sprinkler systems upgrades, a review of the water containment systems located within the Wetherill Park Resource Facility should be undertaken by SUEZ to ensure any increases to contaminated fire water remains adequately contained to the site.

Subsequent to the above comment, FRNSW has no further recommendations or comments to provide at this time in relation to the Wetherill Park Resource Facility (SSD 7267).

SUEZ Response

SUEZ appreciates the feedback from FRNSW and would review the water containment system located within the facility.

We currently have a trade waste agreement in place with Sydney Water to dispose wastewater. The average daily flow limit is 1 kL/day which coincides with the estimated future total wastewater volume. The average

daily flow maximum and instantaneous maximum are 2 kL and 1.5 L/s which are significantly greater than the projected total wastewater volume and can accommodate any fire washdown water. Nevertheless, this containment system would be further reviewed during the design of the fire system upgrade.
If you have any further questions to the above response, please do not hesitate to contact me at (02) 9708 7853 or Steve Marcon (02) 9708 7879.

Yours sincerely

Carol Ng
Project Manager
SUEZ Recycling & Recovery Pty Ltd

Attachment A: Agencies' submissions
Attachment B: SOP078 Bund Construction and Maintenance
Attachment C: Site EMP and relevant SOPs

Attachment A
Agencies' submissions

From: Cameron Wheatley
To: Susan Fox
Subject: Wetherill Park Resource Facility (SSD 7267) - Response to Submissions (BFS16/2330)
Date: Tuesday, 25 October 2016 5:06:32 PM

Good afternoon Ms Fox,

Fire and Rescue NSW (FRNSW) has received the SUEZ Response to Submissions (RTS) associated with the Wetherill Park Resource Facility (SSD 7267).

In particular, FRNSW has reviewed section 3.9 – Hazard and Risk of the RTS which relates specifically to the comments provided within the FRNSW letter dated 24 May 2016 (TRIM Document Number D16/43000). The RTS indicates that both FRNSW recommendations one (1) and two (2) have been agreed to by SUEZ.

Given the agreement for upgrades to both the fire hydrant and sprinkler systems, FRNSW provides one additional comment:

1. Given the possible increases in contaminated fire water as the result of the proposed fire hydrant and sprinkler systems upgrades, a review of the water containment systems located within the Wetherill Park Resource Facility should be undertaken by SUEZ to ensure any increases to contaminated fire water remains adequately contained to the site.

Subsequent to the above comment, FRNSW has no further recommendations or comments to provide at this time in relation to the Wetherill Park Resource Facility (SSD 7267).

Kind regards,
Cameron.

Station Officer Cameron Wheatley
Acting Team Leader
Fire Safety Assessment Unit

Fire & Rescue NSW

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Amarina Avenue, Greenacre, NSW 2190 | Locked Bag 12, Greenacre, NSW 2190

Twitter.com/FireRescueNSW | Facebook.com/FRNSW | YouTube.com/FireAndRescueNSW

From:	Andrew Mooney
To:	Susan Fox
Cc:	Kelly McNicol
Subject:	RE: SUEZ Wetherill Park Resource Recovery Facility Extension
Date:	Tuesday, 1 November 2016 11:25:46 AM
Attachments:	image027.png

Hi Susan

Council has reviewed the RTS and provides the following comments:

Flooding Issues:

Appendix A includes a detailed Flood Impact Assessment, which was undertaken using Council's Developer Agreement process. The applicants have modelled the base and proposed case, and provided flood height and velocity differences.

After reviewing the results, Council's Catchment Branch is satisfied that the impact to flood levels will be kept within the proponents site and complies the Flood Effects section of Schedule 6 of Chapter 11 of the DCP.

It is noted that the the driveways at the rear of the property have over 1m depth of flood water in the 100 year ARI, and these areas should be not be used as an evacuation route during times of flooding.

Environmental Management:

According to the RTS, all indicative amounts of oils, solvents, etc are given in Appendix M of the Environmental Impact Statement (EIS). Bunding is to be designed in accordance with the relevant Australian Standard and internal drainage will be directed to the existing onsite waste water treatment system 'if required'. Bunding of the first flush detention tank is to be designed as per the relevant Australian Standard. No details of any proposed bunding or drainage have been presented. Leaving these details for the 'detailed design of the project' is not acceptable to Councils Environmental Management Section (EMS).

The use of the existing washbay as a wheel wash can be conditioned.

Management of the volumes of putrescible waste at the premises is addressed in the response through statements regarding the predictability of waste delivery from Council and commercial sources preventing this waste from remaining at the site for more than 24 hours.

It states that the EIS contains a commitment to prepare an Operational Environmental Management Plan (OEMP) describing measures to maintain the site in a clean and tidy state. Given that the amount of putrescible waste to be processed by the site is to increase from 10,000 tonnes to 140,000 tonnes per annum, further detail is required on the methods for managing waste deliveries to prevent wastes being stored onsite for more than 24 hours, potentially causing odour issues. It is noted that the EPA expects areas contaminated with putrescible waste to be washed down at least daily. The response document states that this wash-down is proposed to occur weekly.

Disposal of wastewater via the Trade Waste agreement with Sydney Water Corporation can be conditioned.

A SEPP 33 Risk Screening Report was submitted with the EIS. While this did not specifically consider the offensiveness of the proposal, odour issues are addressed in other documents.

EMS Recommendations

Based on the submitted information, EMS considers that the following information should be sought prior to further comment:

- Full details of any spill management/ bunding for the proposed workshop and the 'first flush' detention tank;
- Given that the amount of putrescible waste to be processed by the site is to increase from 10,000 tonnes to 140,000 tonnes per annum, further detail is required on:
- The methods for managing waste deliveries to prevent wastes being stored onsite for more than 24 hours;
- The updated Operational Environmental Management Plan (OEMP), including any supplementary documentation;

Regards

Andrew Mooney
Coordinator |Strategic Planning
City and Community Development

PO Box 21, Fairfield NSW 1860
P 9725 0214 | F 9725 4249
www.fairfieldcity.nsw.gov.au

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Fairfield City Council

From: Susan Fox [mailto:Susan.Fox@planning.nsw.gov.au]
Sent: Tuesday, 18 October 2016 10:32 AM
To: Andrew Mooney
Cc: Mail Mail; Kelly McNicol
Subject: RE: SUEZ Wetherill Park Resource Recovery Facility Extension
Importance: High

Good morning Andrew,

Please find attached a link to the Department of Planning and Environment's website to the SUEZ Response to Submission (RTS) for the Wetherill Park Resource Recovery Facility (SSD 7267). I invite Council to provide comments on the RTS by **Tuesday, 8 November 2016.**

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7267

Regards

Susan Fox

Susan Fox
Senior Planning Officer I Industry Assessments
Level 22, 320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T: 02 9274 6466 E: susan.fox@planning.nsw.gov.au


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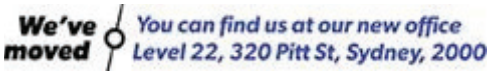

From: Andrew Mooney [mailto:AMooney@fairfieldcity.nsw.gov.au]
Sent: Wednesday, 1 June 2016 9:44 AM
To: Susan Fox <Susan.Fox@environment.nsw.gov.au>
Subject: RE: SUEZ Wetherill Park Resource Recovery Facility Extension

Hi Susan

Please find attached Council's submission to the above proposal

regards

Andrew Mooney
Coordinator |Strategic Planning
City and Community Development

PO Box 21, Fairfield NSW 1860
P 9725 0214 | F 9725 4249
www.fairfieldcity.nsw.gov.au

From: Susan Fox [mailto:Susan.Fox@environment.nsw.gov.au]
Sent: Monday, 30 May 2016 4:44 PM
To: Andrew Mooney
Subject: RE: SUEZ Wetherill Park Resource Recovery Facility Extension

Thanks Andrew.

Regards

Susan Fox

Susan Fox | **Senior Planning Officer**
Industry Assessments | Department of Planning and Environment
23-33 Bridge Street SYDNEY 2000 | GPO Box 39 SYDNEY 2001
t: 02 9228 6466 | e: susan.fox@planning.nsw.gov.au

-
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NSW GOVERNMENT | Planning & Environment

From: Andrew Mooney [mailto:AMooney@fairfieldcity.nsw.gov.au]
Sent: Monday, 30 May 2016 4:38 PM
To: 'Ng, Carol'; Susan Fox
Subject: RE: SUEZ Wetherill Park Resource Recovery Facility Extension

Hi Susan and Carol

I have received comments from various Council Departments in the process of incorporating Council's issues into a submission and should have it to you by tomorrow. Just so your aware the key issues to be raised are as follows;

Flooding Assessment

The flood levels for the site are identified within the EIS (Table 6.3 on page 54), but no assessment has been undertaken as to the impact of the proposal on flooding in this location. The development is proposing construction within the floodplain (new entry & exit ramps at a minimum), which warrants a flood impact assessment.

This will most likely need be undertaken via a developers agreement to model the change in flood behaviour, unless it can be proven that there are no proposed changes to the floodplain (i.e. no change in ground levels or flowpaths).

Traffic

- The development application shall be referred to the Roads and Maritime Services for comments.
- The proposed disabled parking space shall comply with AS/NZS 2890.6:2009 (Off-Street parking for people with disabilities).
- To address the concerns associated with vehicles waiting to enter the weighbridge two (2) queuing lanes shall be provided.

Environmental Managment

Based on the submitted information, Council's Environmental Management Branch believes that the following information should be sought prior to further comment:

- Details of any spill management/ bunding for the 'first flush' detention tank;
- Comments from Sydney Water Corporation regarding the additional load on the existing Trade Waste disposal agreement;
- An updated Odour and Dust Management document;
- Methods to be used to minimise the onsite storage of putrescible waste;
- Details of a wheel wash to be used during construction;
- Comments on the offensiveness of the proposal as per SEPP 33

Details of the proposed workshop, including:

- Volumes of oils, solvents, etc, to be held;
- Bunding for liquid storage/ work areas;
- Internal drainage and treatment.

Council's Building Control Branch have requested a range of standard conditions of approval be applied to the development.

Ill forward these in my letter to you

regards

Andrew Mooney
Coordinator |Strategic Planning
City and Community Development

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Fairfield City Council

From: Ng, Carol [mailto:carol.ng@suez-env.com.au]
Sent: Monday, 11 April 2016 11:43 AM
To: Andrew Mooney
Cc: Susan Fox
Subject: SUEZ Wetherill Park Resource Recovery Facility Extension - SEARs (SSD 7267)

Hi Andrew

As discussed, please find attached soft copy of the EIS document for Wetherill Park Resource Recovery Facility, I will send through the appendices through a separate email.

Exhibition is likely going to be in 2 weeks time and the Department of Planning will contact Fairfield Council in due course for comments.

We will also courier a hard copy to Council office soon

Best regards

Carol Ng
Project Manager
SUEZ Recycling & Recovery
Australia & New Zealand
—
Tel : +61 (0) 2 9708 7853
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Our reference: DOC16/562172

Team Leader Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Susan Fox

EMAIL & STANDARD POST
8 November 2016

Dear Ms Fox,

SSD 7267 - SUEZ Resource and Recovery Pty Ltd – Application to increase the solid (putrescible) waste capacity from 10,000 tonnes per annum (tpa) to 140,000 tpa – Wetherill Park Resource Recovery Facility

On 26 April 2016 the EPA received notification from the NSW Department of Planning and Environment (DPE) regarding State Significant Development SSD_7267 – Increase in putrescible waste at the Wetherill Park Resource Recovery Facility to 230,000 tonnes per annum (the Application). The Application was initiated by SUEZ Resource & Recovery Pty Ltd (the Applicant).

Wetherill Park Resource Recovery Facility currently operates under Environment Protection Licence No. 4548 (the Licence) to undertake the Scheduled Activities of Waste Processing (non-thermal treatment) and Waste Storage at 20 Davis Road, Wetherill Park - Lot 402 DP 603454 (the Premises).

The EPA has reviewed the Response to Submissions and is generally satisfied with the information provided, however has identified that odour emissions from the proposed truck trailer area east of the transfer station building were not sampled in the Environmental Impact Statement nor were any mitigation measures provided to address potential fugitive odours from this area.

Trailers used for transport of putrescible waste parked in the proposed area are likely to be a source of odour particularly if the trailers are open/walk in floor style. Unless transfer trailers are parked within an enclosed building, are free of waste residue or are sufficiently airtight with a continuous rubber seal then they should have been included in odour modelling for the premises.

The EPA advises that it cannot provide General Terms of Approval for the Proposal until the Applicant addresses this deficiency. If you have any questions about this request please contact me on (02) 9995 5646.

Yours sincerely

TREVOR WILSON
Unit Head Waste Compliance
Environment Protection Authority

PO Box A290 Sydney South NSW 1232
59-61 Goulburn St Sydney NSW 2000
Tel: (02) 9995 5000 Fax: (02) 9995 5999
TTY (02) 9211 4723
ABN 43 692 285 758
www.epa.nsw.gov.au

Attachment B

SOP078 - Bund Construction and Maintenance

Bund Construction and Maintenance

SOP078

Purpose and Scope

To outline the requirements for bunding on site and ensure design, construction and maintenance of bunding is undertaken in such a way that it reduces the risk of personal injury and environmental harm from spills and leaks.

This procedure relates to all SUEZ sites where liquids are stored in bulk (in above ground tanks or drums) and where transfer of liquids occurs.

Key Hazards

- Spills and leaks from infrastructure leading to pollution of water and/or soil
- Contamination of stormwater from spills/leaks
- Fire or explosion from uncontrolled spill or leak

KEY OPERATIONAL CONTROLS	detailed actions overleaf
Bunding required on all sites where there is a risk of spills from storage of liquids / liquid transfer	
All bunding must comply to the relevant standards for the material stored	
Regular Inspections of all bunds	
Emptying and disposal of water/liquid build up	

Key Actions

ITEM	ACTION	RESPONSIBILITY
General Requirements		
1.	A bund is any impervious embankment which provides a barrier to retain liquid and to facilitate clean-up operations and is a major component of a spill containment system.	-
2.	A bund is designed to contain any spillages and/or leaks from any liquids used, stored or processed on site and also helps in facilitating clean up. Bunds are integral in preventing pollution to the environment and can also be used for fire protection, product recovery and process isolation.	-
3.	The requirement for bunding on site is based on site specific risk factors including: • The type of Liquid being used and the potential impact on the environment, • The amount of liquid being used / stored, • The overall protection from leakages/spills provided by the facility/storage system, • The duration of any temporary storage, and • The sensitivity of the surrounding environment	-
4.	A bund must be constructed on site for the following: • Where bulk liquid storage tanks are used, • Where any liquid is stored on site in drums or other small packages, • Any on site area used for liquid material transfer, and • Wash bays / wash areas	Site Manager
5.	Bunding must also be in place on site where the area drains to the sewer or a wastewater treatment plant.	Site Manager
Bund Design and Construction		
6.	Bund construction must comply with the Australian Standard relevant to the material being stored (refer to the Related Documents for a list of applicable standards).	Site Manager
7.	Bunding for bulk liquid storage tanks must hold minimum 110% of the largest tanks capacity and the following additional capacity requirements: • Allowance for average rainfall in the area (were uncovered), • Must hold the output of 20 mins of firewater for any sprinkler system installed (approx. 133% of the tank capacity), • Plus 10% of the capacity of the largest tank for emergency management (firewater consideration)	 Site Manager

	• Allowance for water displacement due to other tanks and foundations within the bund, • Plus 10% of the capacity of the second largest tank (where applicable)		
8.	Bunding for drum storage must hold at least the volume of 25% of the drums to be stored in the area (maximum drums designed to hold) up to 10 Kilolitres (kL) plus the following additional requirements: • Allowance for average rainfall in the area (were uncovered), • Must hold the output of 20 mins of firewater for any sprinkler system installed, • Plus 10% of the maximum drum capacity for emergency management (firewater consideration)		Site Manager
9.	Where tanks are interconnected they must be treated as a single tank capacity when defining bunding capacity requirements.		Site Manager
10.	Bunds must be constructed of materials that are impervious to and compatible with the liquids contained and prevent migration of any spillage or leakage to the surrounding environment.		Site Manager
11.	Bunds must be of a suitable construction to retain their structural integrity during a fire situation.		Site Manager
12.	Earthen bunds are not acceptable for tanks as they are not impervious to liquids.		Site Manager
13.	The height of bund walls will depend on the capacity required. Bund walls should generally be between 0.5 and 1.5 metres high. Where the bund wall is >1 metre, appropriate steps or a ladder must be provided for access. Refer to *Ladder Use* for further details. **Note:** Bund walls below 0.5 metres provide a larger surface area for collection of rainwater and are more exposed in a fire. Low walls also increase the likelihood of damage from vehicles.		Site Manager
14.	The distance between the tank and the bund wall must be a minimum of 1 metre.		Site Manager
15.	Where a bund wall is required to be over 1.5 metres high the bund must be considered a confined space and a means for a safe and rapid entry and exit must be provided.		Site Manager
16.	Ensure concrete bunds are poured integrally with the slab. Where joints are used in concrete or masonry systems, they must be sealed with a suitable sealant material.		Site Manager
17.	Ensure the bund floor is graded and drains to a collection sump. There must be no access to the stormwater system within the bund. The drain of one compound must not drain into another.		Site Manager
18.	For flammable liquids, a distance of half the height (with a minimum distance of 1m) of the tank or stack of drums must separate tanks and drums from the inner edge of the bund wall.		Site Manager

19.	Where possible bunds should be designed with a roof which prevents rainwater getting into the bunded area. **Note:** the roof must not restrict the application of water in an emergency fire situation.		Site Manager
20.	All piping and pumping facilities should be arranged so that no liquid escapes the confines of the bund.		Site Manager
21.	Pipework should go over bund walls, If pipework goes through bund walls, the point where the pipe passes through the wall of the bund must remain gap-proof and crack-proof, even in a fire. A sealant is needed around all pipes that go through walls.		Site Manager
22.	Any hose couplings in the bund should be located where leaks or spillages are contained within the bund. If the couplings are away from the bund then another means of collecting and retaining spills and leakages must be provided.		Site Manager
23.	If the liquid is classed as a dangerous good, the bund must allow for the trajectory of a liquid leak, assuming a full tank with an elevated leak. The location of bunds shall be in accordance with the Crest Locus Limits in AS1940.		Site Manager
24.	Where vehicle access is required into a bunded area, ramps or roll-over bunds must be used to maintain effective bund height.		Site Manager
25.	Where vehicles are required to operate in close proximity to bund walls, the bund walls must be protected by bollards to prevent damage.		Site Manager
26.	A means of entry and exit by personnel must be provided into and out of the compound, under both normal and emergency conditions.		Site Manager
27.	Where two or more different liquids are stored on site, they must be stored in separate bunded areas.		Site Manager Site Manager
Bund Inspection and Maintenance			
28.	Bunds must be inspected regularly to ensure they remain structurally sound and there is no build-up of rainwater or other liquid in the bund.		
29.	The following must be inspected: • Bund walls and floors are free from cracks – impervious to leakage, • Valves, pumps, pipes and hoses associated with the bund are in good working order, • Spills within the bund are cleaned immediately (no water accumulated), • the drain valve is fully closed and locked when not in use, • access to inspect the drain valve is possible by all operators		Worker
30.	Where any of the above items are not acceptable, or where liquid accumulation (not rainfall) is evident, report to the Site Manager immediately.		Worker

31.	Damaged bunds and/or associated infrastructure must be repaired as soon as reasonably practicable.		Site Manager
Emptying bunds and disposal of waste			
32.	After any rainfall, bunds must be emptied as soon as possible to maintain full capacity of the bund		Worker
33.	When a bund must be emptied, the liquid should be pumped out not emptied through a drain valve where possible		Worker
34.	The water within the bund must be inspected to determine if it is contaminated or not – this can be done visually. If there is any suspicion of contamination, the water must be tested before it is removed from the bund		Worker
35.	Where the water is considered **un**contaminated it may be used on site		Worker
36.	Contaminated water must be appropriately treated prior to disposal (e.g. through the trade waste system or transported to a treatment facility).		Site Manager

Definitions

Dangerous Goods: a substance or item which meets the classification criteria of, or listed in, the Australian Dangerous Goods Code. Materials classified as dangerous goods should be marked with a class label which indicates the nature of the hazard; for example, an explosive, a gas, a flammable liquid or solid, an oxidising agent, a poison, or a radioactive or corrosive substance.

Hazardous substances: can include chemicals or other materials that are used or produced that can harm people or the environment if stored or handled incorrectly.

Bund (as defined by AS/NZS 4452:1997): “an impervious embankment of earth, or a wall of brick, stone, concrete or other suitable material, which may form part or all of the perimeter of a compound that provides a barrier to retain liquid”.

Fire Water: water that has been used in firefighting and requires disposal. Firewater may be contaminated and may pose a threat to the environment if not controlled

Related Documents

DOCUMENT NAME	REFERENCE NUMBER
Monitoring Checklists (Site Specific)	
Australian Standard 1940 - 2004: The storage and handling of flammable and combustible liquids	
Australian Standard 4326 – 2008: The storage and handling of oxidising agents	

Australian Standard 2714 – 2008: The storage and handling of organic peroxides	
Australian Standard 3780 –2008: The storage and handling of corrosive substances	
Australian / New Zealand Standard 4452:1997: The storage and handling of toxic substances	
Dangerous Goods Act 1975	
Environmentally Hazardous Chemicals Act 1985	
Code of Practice: Storage and Handling of Dangerous Goods	
Occupational Health and Safety Act 2000	
Storage and Handling Liquids: Environmental Protection Participants Manual (DECC)	
Bunding and Spill Management EPA Guidelines South Australia 2007	
Bunding Guidelines Information Bulleting EPA Victoria	
Ladder Use	WI060

Review and Document Control

VERSION	CHANGE	REVIEWED	AUTHORISED	DATE ISSUED
0	Initial Issue		GM – Ops & Dir ES	07/07/04
1	General review. Update of position titles. Update of Australian Standard and Legislation references.	EWSO	IMS Mgr	06/11/09
2	Removal of WSN references, replaced with SUEZ	EQS Corp	IMS Mgr	28/06/11
3	Reformatted into new template. Expanded scope.	EQS Mgrs	IMS Mgr	03/01/12
4	Removal of 'daily inspections'	Vic EQS	IMS Mgr	31/08/2012
5	Full review and update in line with applicable standards. Contains more detailed requirements for bund design and capacity. Inclusion of fire water considerations for bund capacity requirements Removal of annual integrity test requirement	Safety Systems Manager	GM EQS	22/06/15
6	Rebranded from SITA to SUEZ	System Administrator	Safety Systems Manager	26/4/16

Attachment C
Site EMP and relevant SOPs

Odour Management

SOP065

Purpose and Scope

SUEZ Australia's (SUEZ's) waste management and recycling operations have the potential to cause offensive odours.

The purpose of this procedure is to outline mandatory requirements to effectively identify, assess and manage odour across all sites.

SUEZ recognises that offensive odours can impact the environment and neighbouring communities and will take all practical measures to reduce odour generation.

> *Offensive odours are defined in all Australian states and territories as a smell or scent which negatively affects the general life, health and wellbeing of a person or community. The consistent emission of offensive odours from SUEZ sites is serious and can result in prosecution by the local environmental authority.*

This procedure applies to all SUEZ sites.

Key Hazards

- Persistent odours resulting in illness (e.g. nausea, headache, loss of sleep and other symptoms of stress);
- Environmental pollution;
- Breach of statutory duty or licence conditions;
- Reduction of local amenity; and
- Strain to community relations and undesirable media attention.

KEY OPERATIONAL CONTROLS	detailed actions overleaf
Odour Source Identification: Identification of potentially odorous activities	
Information and Training: Relevant workers to be provided training and instruction for managing odours	
Site Management: Adherence high housekeeping standards and control of site amenities	
Complaint Registration, Response and Investigation: Odour complaints to be managed and recorded	

Key Actions - General

ITEM	ACTION		RESPONSIBILITY
General Responsibilities			
1.	**Site Managers and Supervisors must ensure that:** • The actions in this procedure are delegated, carried out and communicated to the relevant workers; • All applicable licence conditions are followed; • Potential odour sources are identified and risk assessed; • Odour monitoring occurs in line with site Environmental Management Plan; • Site odour controls have been implemented in accordance with site specific documentation; • Odour controls are operational, regularly maintained and reviewed for effectiveness; • All workers are trained in the identification and reporting of offensive odours (see also Item 4-5); and • Odour complaints are managed in accordance with the Environmental Complaints Management SOP.		Site Manager / Supervisor
2.	**EQS personnel (including compliance personnel)** are responsible for: • Carrying out control measures within their area of responsibility; • Participating in and providing training (where appropriate); and • Ensuring site managers and supervisors are aware of their responsibilities under this SOP.		EQS Personnel & Compliance Personnel
3.	**All workers** are responsible for reporting odours to their Supervisor (or EQS personnel), carrying out control measures within their area of responsibility and participating in training.		All Workers
Information, Training and Instruction			
4.	Training in this SOP and the site Environmental Management Plan must be provided to relevant personnel by experienced and competent SUEZ employees as part of on-the-job training.		Site Manager
5.	Training records must be maintained in accordance with the Induction, Training and Competency Procedure.		Site Manager
Legal and Other Statutory Requirements			
6.	All sites must control on-site odours in line with the applicable national, state or territory laws, environmental authority licences, ministerial conditions/directions and council/local government requirements. Licenced premises must control on-site odours and ensure that potentially offensive odours do not impact the environment and communities beyond a site boundary. Environmental protection licences may outline specific odour control, monitoring and reporting requirements which must be adhered to. **Note:** Statutory requirements may include the implementation of specific odour control methods and the creation of specific documentation.		Site Manager

SUEZ Requirements		
7.	All sites must develop, implement and maintain a site Environmental Management Plan which includes procedures for the management and monitoring of odours. This documentation must include (but is not limited to): • Previously identified potentially odorous sources/activities (including potential external odour sources and the location of neighbours); • Site design and features, with detailed odour control measures; • Maintenance schedules for the maintenance of odour prevention systems; • An odour monitoring schedule; • Training requirements; and • Housekeeping procedures.	Site Manager
Odour Complaints Handling		
8.	All odour complaints must be managed in accordance with the Environmental Complaints Management SOP.	Site Manager
9.	The Site Manager or compliance officer must verify and investigate odour complaints and identify the potential source of the odour.	Site Manager
Odour Identification and Assessment		
10.	Potential sources of odour, including potentially odorous activities must be identified and recorded in accordance with the site Environmental Management Plan. These activities include waste acceptance, waste processing, transportation and stockpiling.	Site Manager
11.	Consider surrounding areas for other potential odour sources	Site Manager
12.	Sources which have may have a high risk of emitting offensive odours must have a risk assessment completed in accordance with the *Risk Management Procedure.*	Site Manager/EQS personnel
13.	The recommended tool for describing odours is the *Suez Environnement Odour Wheel.* The odour wheel assists in creating a common language among workers and external stakeholders and enables more effective identification of odours.	Site Manager

Figure 1 – Suez Envrionnement Odour Wheel

Key Actions – General Controls

ITEM	ACTION		RESPONSIBILITY
Odour Controls - General			
14.	The following hierarchy of controls must be given due consideration when developing controls at a site level		
	1. **Elimination** of odour sources where possible	Eliminating the risk of odour is the best protection strategy and is undertaken in the design stage	
	2. **Avoid** odour sources where possible.	Practical control methods to avoid odour emissions include: • Buffer Zones – e.g. tree planting along facility boundaries • Ensuring workers **do not exceed** outdoor stockpile limits • Avoiding particular activities at certain times of the day of when certain weather conditions are in place or predicted. • Ensuring that particularly odorous loads are either rejected or immediately buried.	
	3. **Engineering** odour sources where possible.	Engineering odour control include: • Odour suppression systems • Deodorisers • Process Controls • Bio filters • Re-designing • Cover / enclose areas such as tanks and bins where possible	
	4. Implementation of **Administrative** controls where possible	Administrative controls are the easiest controls which are able to be implemented and include: • Odour monitoring programs and schedules • Operational controls • Formal odour reports by experts • Keeping doors closed • Maintenance • Training • Effective internal and external communication methods • Community and Stakeholder meetings • Weather stations	
15.	Objectives and targets in relation to odour management must be established and monitored annually by each site. This information is also tracked by state and national EQS personnel in accordance with the Monitoring and Measurement Procedure.		Site Manager
16.	Enclosed facilities (including ARRTs, MRFs and RRTFs) must ensure that waste is received and initially processed within the confines of the facility. Enclosed facilities must also ensure that biofilters and ventilation systems are maintained regularly as per the Biofilter Manual.		Site Manager

17.	Lids on bins containing waste which are temporarily stored on site must remain closed at all times	Site Manager

Key Actions – Operation / Facility Specific Controls

Resource Recovery Centres (e.g. Transfer Stations, MRFs)		
18.	The following odour controls must be considered in developing site specific processes: • Regular clearing and washing of push-pits and packers; • Strict control of waste acceptance and refusing to accept particularly odorous waste (where possible); • Timed odour neutralisation system installed within the transfer station building and the perimeter of the green waste area; and • Keeping the number of full waste vehicles stored overnight to a minimum.	Site Manager
Collections (e.g. Service Centres)		
19.	The following odour controls must be considered in developing site specific processes: • Daily emptying of vehicles; • Weekly washing of vehicles; and • Washing and storage of on-site bins in line with the Waste Bin Management at Service Centres SOP.	Site Manager
Composting and Organics (e.g. ORRFs, ARRTs)		
20.	The following odour controls must be considered in developing site specific processes: • Removal of non-compostable material from the waste stream; • Use of the wheel washing facility during wet weather for trucks leaving the site (to minimise the spread of potentially odorous particles into the surrounding area); • A limitation on windrow height to prevent anaerobic conditions developing; • Regular turning and monitoring of windrows to maintain aerobic conditions; • Management of process water in collection ponds to prevent odour; • Correlation of any odour complaints with weather conditions and site activities; and • Maintenance of a buffer zone around the site (where plants are used, species should attenuate off-site movement of odours).	Site Manager

Landfill		
21.	The following odour controls must be considered in developing site specific processes: • Daily covering of all waste; • Covering odorous wastes as soon as possible after delivery; • Application of odour-neutralising sprays where required; • Use of the wheel washing facility during wet weather for trucks leaving the site (to minimise the spread of potentially odorous particles into the surrounding area); • Maintenance of aerobic conditions in green waste composting operations • Mechanical aeration of the dams located near the green waste composting facility to maintain aerobic conditions and control odour; • Chemical dosing of the site dam to reduce the odours (applicable where mechanical aeration is precluded, or does not maintain aerobic conditions); • Installation and operation of a landfill gas collection and flaring system and a gas-to-electricity power station; • Placing prominent signs at the entrance to the landfill defining acceptable solid wastes; • Random monitoring and inspection of incoming vehicles to determine waste composition; • Monitoring deposited waste during spreading, compaction and covering; • Recording of all rejected waste loads in the weighbridge logbook; • Maintaining a vegetated zone around the site to buffer odours and assist in the dispersion of fugitive emissions; • Regular inspections of the areas being filled; • Regular visits to the site boundary to detect odour levels; • No depositing of waste in standing water; • Grading landfill areas to shed stormwater; • Depositing waste in thin layers to optimise compaction; and • Minimising disturbance of previously filled areas.	Site Manager
22.	Landfill sites must ensure that gas capture infrastructure is adequately managed in accordance with the *Landfill Gas Management, Gas Control Plan SOP.*	Site Manager
23.	Where applicable, Leachate Management procedures on site must be developed in accordance with the *Leachate Management SOP.*	Site Manager

Definitions

Odour	A distinctive smell.
Offensive Odour	An odour that by reason of its strength, nature, duration, character or quality interferes or is likely to interfere with the comfort of a person (this is a subjective test).
Nuisance	An undue invasion of the interest of the affected person in the possession use and enjoyment of land.
Environment	The surrounding in which the organisation operations, including air, water, land, natural resources, flora, fauna, humans and their interrelation
Preventative Action	An action intended to eliminate the cause of a potential non-conformance.
Pollution Prevention	Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control the creation, emission or discharge of any type of pollutant or waste in order to reduce adverse environmental impacts.

Related Documents

DOCUMENT NAME	REFERENCE NUMBER
Biofilter Manual	MAN030
Environmental Management Plan	PLANS004
Environmental Management Standard - ISO14001	-
Incident Reporting and Corrective Action Procedure	PROC008
Induction, Training and Competency Procedure	PROC002
Landfill gas Management, Gas control plan	SOP038
Leachate Management	SOP036
Leachate Management Manual	MAN022
Management of Environmental Complaints Procedure	SOP066
Monitoring and Measurement Procedure	PROC007
Risk Management Procedure	PROC006
Waste Acceptance Manual	MAN009
Waste Bin Management at Service Centres	SOP001

Review and Document Control

VERSION	CHANGE	REVIEWED	AUTHORISED	DATE ISSUED
1	Initial Issue	Nat. Enviro& Sustainability Officer	GM EQS	20/05/15
2	Rebranded into new SUEZ format.	JB	Int Sys Mgr	25/05/16

Spill Response

SOP007

Purpose and Scope

The purpose of this SOP is to:

- Outline the requirements for spills kits on site and in vehicles
- Describe how to contain a spill (oil, liquid, fuel etc),
- Specify the steps that must be taken to clean up a spill.

This procedure applies to all vehicles, plant, tanks, pipes and other liquid holding vessels (both on site and in transit) at SUEZ.

Note – Leachate Spills must be managed in accordance with the 'Leachate Spill' action plan in the site *Emergency Response Plan*

Key Hazards

- Spills resulting in surface or groundwater contamination
- Spills resulting in land contamination
- Spills resulting in traffic or pedestrian hazards
- Incorrect disposal of waste resulting in contamination and /or a breach of legislative requirements
- Resource wastage
- Inappropriate resources on site to manage spills

PPE Requirements

KEY OPERATIONAL CONTROLS	detailed actions overleaf
Risk Management – Identify potential for spills in Site Risk Registers	
Safety procedures for spills in transit and on site	
Maintenance of vehicle / plant, fuel storage tanks and bunding	
The use of spill containment kits/materials	

KEY OPERATIONAL CONTROLS	detailed actions overleaf
VCRs (FORM003) and Mobile Plant Checklists (FORM042)	
Correct disposal of absorbent materials and contaminated soil	
Inspection of vehicle and plant parking areas	

Key Actions

ITEM	ACTION	RESPONSIBILITY
General Requirements		
1.	A spill is any discharge of a liquid on or off site which requires clean up and may or may not impact on the environment, Types of spills include: • Water spills (from taps or appliances) • Leachate spills (managed in accordance with the site *Emergency Response Plan*) • Vehicle spills (oil, petrol, diesel, motor fluids), • Chemical spills (from use, storage and/or transfer of chemicals), and • Wastewater spills, **Note:** • For procedures for the loss of solid waste in transit refer to *Loss of Waste from Collection Vehicle in Transit* • For procedures for clinical waste spills refer to the *Clinical Waste Spills* procedure	-
2.	All hazards which may result in a spill must be included on the site Risk Register and appropriate controls must be determined. Refer to the *Risk Management Procedure* for more information	Site Manager
3.	Spills which occur on or off site must be controlled and cleaned up as soon as possible in a safe manner	Site Manager
4.	Where a spill occurs on or off site it must be reported in accordance with the *Incident Reporting and Corrective Action Procedure*	Site Manager
5.	For spills either on or off site where there is actual environmental harm, the potential for environmental harm or a licence breach, the relevant authority (e.g. EPA) must be notified. Refer to the site *Emergency Response Plan (Appendix 5)* for notification requirements.	Site Manager

<table>
<tr><th>ITEM</th><th>ACTION</th><th>RESPONSIBILITY</th></tr>
<tr><td colspan="3">Spill Kits</td></tr>
<tr><td>6.</td><td>Spill kits are a collection of items which are used in the event of a spill to ensure prompt response and clean-up is possible and to prevent damage to the environment, they may include:
Pads and rolls,
Booms / socks,
Pillows,
Granules / loose sorbents,
Waste bages, and
Gloves</td><td>  </td><td>Site Manager</td></tr>
<tr><td>7.</td><td colspan="2">All sites must have appropriate spill kits available on site for the type of spills applicable (refer to the hazards identified to determine requirements)</td><td>Site Manager</td></tr>
<tr><td>8.</td><td colspan="2">The items in a spill kit are determined by the type of substances which are on site / required to be contained, always choose the spill kit appropriate for the types of substances<table><tr><th>Type of spill kit</th><th>Type of substance</th></tr><tr><td>Universal Spill kit (general purpose)</td><td>Non-hazardous substances incl. water, coolants, antifreeze, solvents etc</td></tr><tr><td>Oil only spill kit</td><td>Grease, oil based liquids and fuels (repel water)</td></tr><tr><td>HazMat spill kit</td><td>Acid spills and other caustic and aggressive liquid chemicals (can absorb water and oil based substances)</td></tr></table></td><td>Site Manager</td></tr>
<tr><td>9.</td><td colspan="2">The quantity of liquid on site must be taken into consideration when determining the number and size of spill kits required on site. Consideration must also be given to the possibility of fire water and the need to prevent pollution where firewater is present
Note: Firewater is water that has been used in firefighting and requires disposal. Firewater may be contaminated and may pose a threat to the environment if not controlled</td><td>Site Manager</td></tr>
<tr><td>10.</td><td colspan="2">Spill kits on site must be positioned in close proximity to activities where spills may occur e.g. next to fuel bowsers and oil storage tanks.</td><td>Site Manager</td></tr>
<tr><td>11.</td><td colspan="2">Spill kits must be regularly monitored in accordance with the relevant Site Monitoring Checklist to ensure they are fully stocked and free of used items or waste materials.</td><td>Site Manager</td></tr>
<tr><td>12.</td><td colspan="2">Where items from the spill kit are used or where monitoring indicates inadequate items are available, spill kits must be restocked</td><td>Site Manager</td></tr>
<tr><td>13.</td><td colspan="2">All collection vehicles must have a vehicle spill kit fitted.</td><td>Site Manager</td></tr>
</table>

ITEM	ACTION	RESPONSIBILITY
14.	Monitoring of spill kits in vehicles must occur daily through the *Operators Daily Vehicle Condition Report (VCR) & Checklist*	Driver
15.	All vehicle spill kits must be restocked immediately after use	Driver
Training Requirements		
16.	Refer to the Training Needs Matrix for relevant workers to be trained in the use of spill kits and this SOP. Drivers must be trained in accordance with the *Driver Operator Manual*	Site Manager

Key Actions – Spills During Transit (Collection/ Transport Vehicles)

ITEM	ACTION	RESPONSIBILITY
Spills During Transit (from a Collections vehicle, including at customer sites)		
17.	Turn off the vehicle and where fitted or relevant turn off the hydraulic tank tap. Do not continue to drive the vehicle as this will only increase the risk of an environmental impact. This can also cause severe damage to equipment and may jeopardise the health and safety of the public.	Driver
18.	Locate and Isolate the source of the spill if possible	Driver
19.	Make the area as safe as possible by setting up reflective triangles on the road to warn other vehicles and keep them away from the spill.	Driver
20.	**Contain the spill using the vehicle spill kit or other spill containment equipment that is available. Where there is a risk of the spill entering a drain block the storm water drain.**	Driver
21.	Always wear gloves and consider using goggles to protect your eyes from potential splashing and product dust before attempting to clean up the spill. 	Driver
22.	As soon as possible advise despatch of the spill, giving details of your location, the extent of the spill and if known the type of liquid spill Despatch will contact the Site Manager/Supervisor who will direct the situation and decide if external expertise is required.	Driver / Dispatch

ITEM	ACTION		RESPONSIBILITY
23.	Depending on the severity and type of spill the Site Manager/Supervisor will consider: • If additional clean-up is required (above that which the vehicle spill kit can control) • If there is a SUEZ truck nearby that could attend with their spill kit • Contacting the Fire Brigade and other emergency services for assistance • if the use of external expertise is required to manage clean-up **The SUEZ truck and nominated representative (breakdown mechanic, operations representative) must remain at the scene until otherwise directed.**		Site Manager
24.	Notify the EQS Manager and relevant regulatory authorities as required (i.e. Police, Environmental Authority, Local Government etc.). Refer to the *Emergency Response Plan* for further information.		Site Manager
25.	Clean up the spill using spill containment equipment, place soiled material in waste bag. Dispose of used absorbent material in accordance with material guidelines and state/territory legislation. Ensure all spill kit products used are recorded on the Operators Daily Vehicle Condition Report (VCR) & Checklist (FORM009) and that stocks are replenished.		Driver
26.	Do not leave the scene until authorised by Despatch.		Driver
27.	Complete an Initial Incident Report and Environment Incident CAR in SIMS. Follow the *Incident Reporting and Corrective Action Procedures.*		Operations

Key Actions – Spills On Site

ITEM	ACTION	RESPONSIBILITY
Daily Inspections and Inspections of Parking Bays		
28.	Report all leaks from vehicles on the Operator's Daily Vehicle Condition Report (VCR) or Mobile Plant Checklists. Vehicles or Plant with excessive leaks (greater than 200ml per day) are to be tagged out of service in accordance with the *Isolation and Tag Out Procedure* and relocated to the workshop/maintenance for immediate repairs. Note: where a vehicle leak is consistent (i.e. constant drip) but a total amount of liquid cannot be determined, this should be considered an excessive leak and the vehicle tagged out of service	Driver / Operator
29.	If the vehicle/plant cannot be relocated to a workshop, spill trays must be placed under the leak to minimise the amount of oil escaping to sealed or gravel areas.	Driver /Operator
30.	A daily inspection of the parking area should be carried out to identify spillages that have occurred overnight from vehicles. Every effort must be made to identify the	Driver / Operator

ITEM	ACTION	RESPONSIBILITY
	vehicle/plant which caused the spill and it must be reported to the Site Manager/ Supervisor.	
Spills On Site (including Parking Bays, Workshop and on Infrastructure Facilities – not Leachate)		
31.	If operating vehicle / plant, turn off the vehicle/plant. Do not continue to drive the vehicle/plant as this will only increase the risk of an environmental impact. This may also cause damage to the vehicle/plant.	Driver / Operator
32.	Locate and Isolate the source of the spill if possible. For spills from tanks, drums or pipes etc, turn off valves/taps where fitted.	Worker
33.	Make the area as safe as possible by setting up bollards where required around the spill area. 	Worker
34.	Contain the spill with appropriate spill containment equipment. Block storm water drains or access to surface water dams or ponds if required. For Chemical Spills review the SDS for the spill clean-up instructions and the personal protective equipment required. If the SDS is not available or you are unsure of the nature of the chemical you are dealing with seek assistance by contacting your Supervisor. 	Worker
35.	Report the spill to the Site Manager/Supervisor or weighbridge office immediately.	Worker
36.	Where required contact the Fire Brigade or other relevant emergency services for assistance	Site Manager
37.	Notify the EQS Manager and relevant regulatory authorities as required (i.e. Police, Environmental Protection Authority and Local Government etc.). Refer to the *Emergency Response Plan* for further information.	Site Manager
38.	Proceed with the clean up using the appropriate spill containment equipment.	Driver / Operator
39.	Always wear correct Personal Protective Equipment (PPE) including gloves and consider using goggles to protect your eyes from potential splashing and dust before attempting to clean up the spill. 	
40.	For **spills on soil/gravel (unsealed/unpaved areas):** For spills in excess of 500ml the soil/gravel must be dug out and replaced with fresh soil/gravel. The soil/gravel must be disposed of in accordance with the regulations / guidelines applicable in each state. Check site licences for specific clean up requirements. For **spills on sealed areas**: Place the absorbent materials down on the spill and sweep up.	Site Manager

ITEM	ACTION	RESPONSIBILITY
41.	Dispose of absorbent materials in the designated bin (e.g. Prescribed Waste Bin) in accordance with site licence conditions.	Driver / Operator
42.	Check site licence conditions for disposal of used spill materials. If the site is not licenced to dispose of the used material, contact licenced third party to dispose of the material.	Site Manager
43.	Replenish all spill containment materials to ensure spill kits are fully stocked.	Site Manager
44.	**Overhead Storage Tanks:** In the event that the overhead storage tanks leak, all liquids must be directed into a service pit which has the capacity to contain the spill. Contact an approved service provider to pump the service pit(s) out within the confines of the workshop.	Worker
45.	Ensure that any workshop grids, sumps and pits discharging to interceptor systems are cleaned on a monthly basis as per the applicable *Site Monitoring Checklist.*	Site Manager
Key Monitoring		
46.	Visual inspection of parking areas for oil/fluid spills – Daily	Driver / Operator
47.	Site Monitoring Checklists completed as required	Site Manager
48.	Complete the Environmental Authority's waste transport documentation to ensure proper disposal – As Occurs	Site Manager
49.	PPE is worn during clean up – As Occurs	Driver / Operator

Definitions

SIMS – SUEZ's Integrated Management System

Spill Kit – Kits including spill response materials such as absorbents, socks, PPE, waste bags etc to manage the event of a spill

Fire Water – Water that has been used in firefighting and requires disposal. Firewater may be contaminated and may pose a threat to the environment if not controlled.

Related Documents

DOCUMENT NAME	REFERENCE NUMBER
Clinical Waste Spills	SOP150
Driver Operator Manual	MAN001
Emergency Response Plans	PLANS003
Forklift/ Mobile Plant Checklist	FORM042
Incident Reporting and Corrective Action Procedure	PROC008

Induction, Training and Competency Procedure	PROC002
Isolation and Tag Out Procedure	SOP008
Loss of Waste from Collection Vehicle in Transit	SOP016
Monitoring Checklists	FORM026
Operator's Daily Vehicle Condition Report and Checklist	FORM009
Risk Management Procedure	PROC006
SUEZ Integrated Management System - SIMS	

Review and Document Control

VERSION	CHANGE	REVIEWED	AUTHORISED	DATE ISSUED
9	Reformatted into the new SOP template and expanded to include Infrastructure facilities and requirements for spill kits. Structure re-worked. Removal of Dust Control section – placed in separate SOP.	J. Hart, A. Cheng,V. Nedumcharian, B. Sharma, EQS Mgrs, ISM Mgr, GM EQS	Int Sys Mgr	04/09/12
10	Updated first section to include general requirements Updated to include chemical spills and response to all spill sizes. Updated section relating to spill kit requirements Updated on road spill section for consistency with *Driver Operator Manual*	Safety Systems Manager, EQS Managers	Safety Systems Manager	30/09/15
11	Rebranded from SITA to SUEZ	Safety Systems Manager	GM EQS	08/03/2016

Environmental Management Plan

Wetherill Park Resource Recovery Park

Document #. PLANS004

Issue date 30 September 2016

Version 1

Table of Contents

1. Introduction

1.1. Purpose

The purpose of this document is to describe the environmental management of operational activities at Wetherill Park Resource Recovery Park (WPRRF) that have, or are likely to have, an impact on the environment. This document sets out detailed procedures and measures that must be taken to minimise and eliminate environmental impact. This document also assists internal and external stakeholders in assessing environmental performance and ensures transparency across environmental operations.

SUEZ's Environmental, Quality and Safety (EQS) Management System is structured in accordance with the requirements of the following standards:

- AS/NZS 4801:2001 Occupational Health and Safety Management Systems;
- ISO 14001:2011 Environmental Management Systems; and
- ISO 9001:2000 Quality Management System.

SUEZ's EQS system is certified to the above standards by an independent third-party and regular internal reviews are undertaken in accordance with the *Management System Review Procedure.*

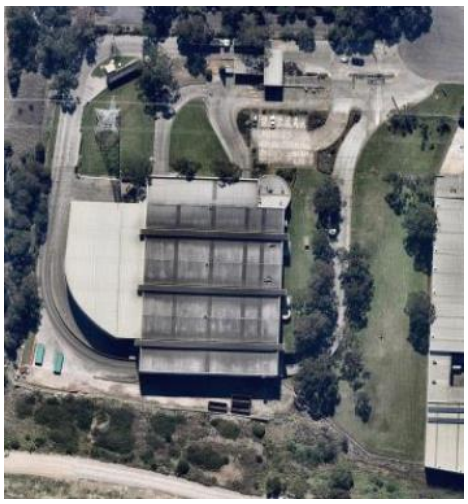


Figure 1 Aerial view of WPRRF

"SUEZ is committed to undertaking all activities in an environmentally responsible way, preventing pollution and proactively developing environmentally sustainable activities." – *Environment Policy*

1.2. Scope

This document applies to all activities undertaken at WPRRF.

1.3. Statutory Requirements

All legislative requirements are managed in accordance with the *Legislative Requirements Procedure.*

The *Environmental Protection Act 1986* (the Act) together with the *Environmental Protection Regulations 1987* provide the primary statutory framework by which the WRRP abides by.

Specific requirements on the site, including operational limits and the limits surrounding water, air, soil emissions, are administered by the Environmental Protection Authority (EPA) through an Environment Protection Licence (the Licence). See **Appendix 1.** for further information on the Licence referred to throughout this Environmental Management Plan (EMP).

1.4. Development Consent

To be updated

1.5. Environmental Impact Statement and Statement of Commitment

To be updated

1.6. Risk Management

Risks to health, safety, the environment and property which arise from our activities are identified, assessed, controlled, reviewed and reported in line with applicable legislation in accordance with the *Risk Management Procedure.*

1.7. Staffing and Training Requirements

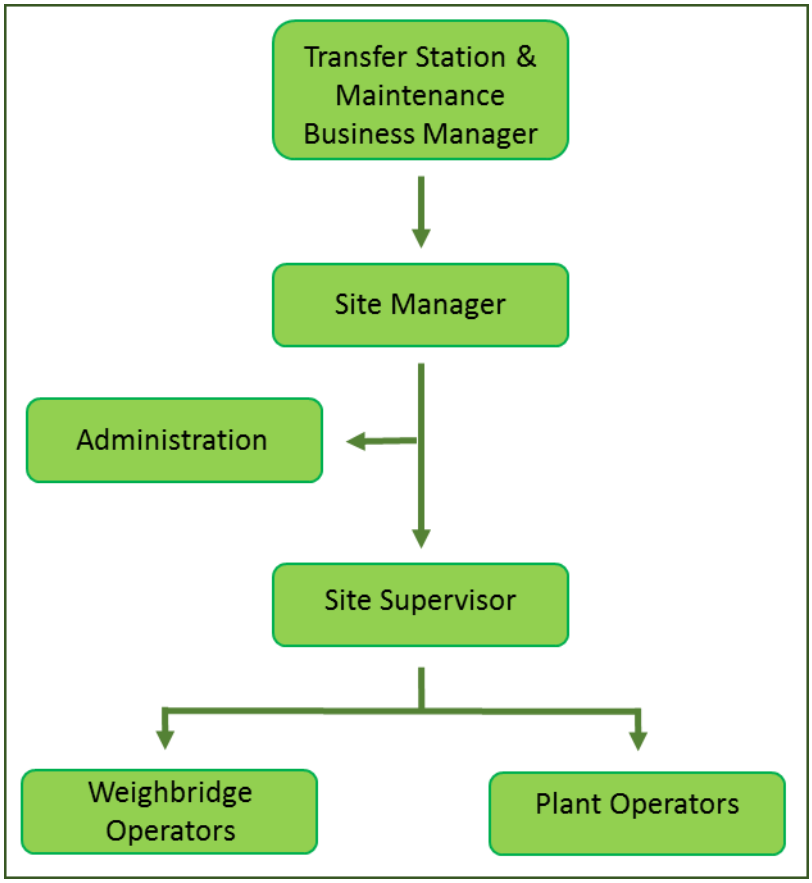
All workers onsite are trained in accordance with *Training, Induction and Competency* Procedure.

The Site Manager ensures the provision of adequate training for workers on-site to ensure that all requirements described in this EMP are met. It is also the Site Manager's responsibility to provide adequate training to all workers performing critical tasks, such as inspection and direction of incoming wastes, operation of the equipment and environmental management on-site.

An environment, quality and safety system has been prepared and implemented by SUEZ. It is designed to provide SUEZ's employees with information about their environmental responsibilities which are outlined in the specific procedure or Standard Operating Procedure (SOP).

Refer to the *Roles and Responsibilities Procedure* for further information on the environmental, quality, health and safety responsibilities of all workers and Senior Management at SUEZ.

1.8. Organisational Structure



1.9. Environmental Auditing and Review

SUEZ evaluates the performance of WPRRF in accordance with *Management Systems Review Procedure, Monitoring and Measurement Procedure, Audit Procedure* and in conjunction with the review process of the EPA, Annual Audit Compliance Report. This document outlines all of the monitoring that has been conducted and the results as well as stating whether WPRRF has complied with the conditions of the Licence.

1.10. Update and Version Control Requirements

This document is version controlled. All updates to this document must be made in accordance with the *Document Control Procedure.*

2. Site Overview

2.1. Site Description and Layout

WPRRF is located at 20 Davis Road, Wetherill Park, within the Fairfield City Local Government Area, in an area zoned 'Industrial', which is surrounded by other industrial facilities. The site occupies and area of approximately one hectare

Potential emission sources from this site include noise, dust and odour.

The closest water body is the Prospect Reservoir located about 150 metres north-west of the site.

The majority of the site is sealed and all waste is stored on concrete hardstands within the transfer shed.

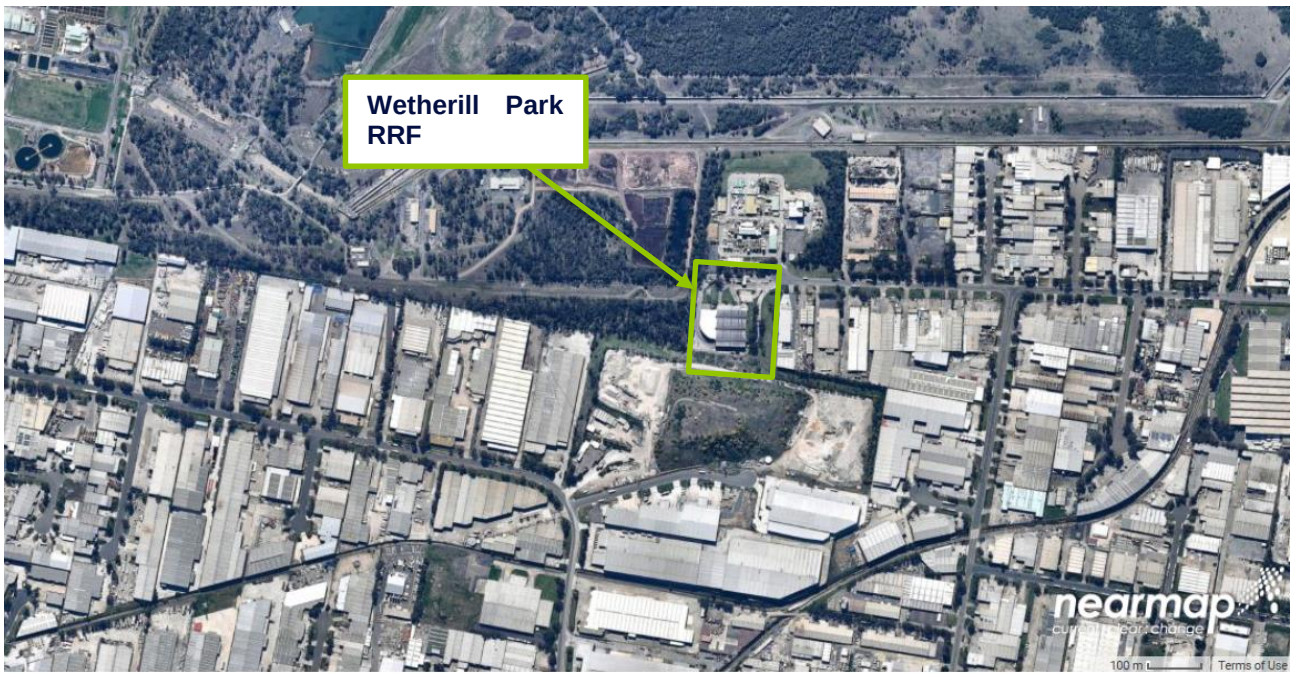


Figure 2 Aerial view of Wetherill Park Resource Recovery Facility

2.2. Infrastructure

WPRRF contains a number of infrastructure items to facilitate recycling and process of waste streams. The facility consists of:

- Administration building;
- Weighbridges (incoming, outgoing);
- Recycling Plant;
- Load out tunnel
- Mobile plant (bob cat, front end loader x2, excavator x3, Dozer, Forklift);
- Trade Waste system;
- Transfer shed; and
- Transgrid Power Lines (Endeavour Energy)

2.2.1. Hours of operation

WPRRF operates in accordance with the hours listed below:

Weekdays	**05.00am – 16:30pm**
Saturdays/Sundays	**08.30am – 15:00am**
Public Holidays	**Closed**

2.2.2. Traffic management

WPRRF assesses the risks and implements appropriate and effective traffic controls in accordance with the *Traffic Management SOP.* Please note that all sites are required to have a traffic management map available to all workers.

A range of vehicles and mobile plant are used at WPRRF to conduct operations, including the transfer and transport of materials in and around the facility. Refer to the WPRRF *Traffic Management Plan* for further details of traffic types and movements.

2.2.3. Landscaping

Landscaping is constructed and maintained in accordance with the *Site Maintenance - Infrastructure Facilities SOP.*

2.2.4. Drainage

With the exception of the landscaped areas, the entire surface of the site is sealed, which facilitates drainage control and minimises the potential for sediment mobilisation. There are several elements to the drainage control system on-site, including contaminated wastewater, a first flush system, stormwater runoff, and rainwater capture.

For details on what to do when a spill occurs, refer to the *Spill Response SOP*.

2.2.5. Security

WPRRF has implemented a number of security measures which includes:

- Suitable fencing to prevent unauthorised access to the site;
- All entrance gates are securely locked when the premises are unattended;
- Security cameras at various locations on site; and
- Regular inspections of security measures and fencing occurs in accordance with the *Site Maintenance – Infrastructure Facilities SOP.*
- Back to base alarms
- Security patrols after hours

2.2.6. Services

WPRRF is connected to the mains water, telephone and electricity systems.

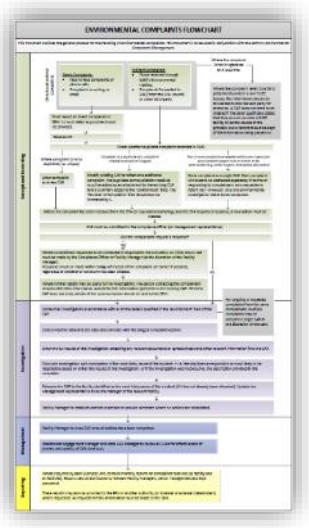
For information on safely conducting work around utility services, refer to the *Utility Services SOP.*

2.3. Overview of WPRRF Activities

WPRRF operates a solid waste and recycling centre, it accepts household and commercial wastes, and council waste. Activities on the site include waste receival, recycling, waste segregation, packing, transportation, storage and environmental management and monitoring.

3. Environmental Incident Management and Community Engagement

3.1. Environmental Incident Management



All environmental incidents are to be recorded in accordance with the *Incident Reporting and Corrective Action Procedure*. Environmental complaints are handled in accordance with *Environmental Complaints Management SOP*. All environmental incidents and complaints are recorded in the SUEZ Integrated Management System (SIMS).

The Licence also has specific notification requirements including:

- Notifying the EPA of any breach of any limit specified in the Licence;

Refer to **Appendix 5.** for notification requirements under the Licence.

Note that all contact with an environmental regulatory body must be approved by the Site Manager or the relevant Business Line Manager.

3.2. Community Complaints

A free call telephone line through SUEZ's customer Service Department operates 24 hours a day, 7 days per week.

Complaints about the site can be registered on the SUEZ customer service line or directly with the site. The details of all complaints received and actions taken in response to the complaints are kept on the SUEZ database through the SUEZ Integrated Management System (SIMS). All complaints received are investigated and responded to within the allocated time frame set out in *Environmental Complaints Management SOP.*

3.3. Emergency Preparedness

The WPRRF *Emergency Response Plan* (ERP) sets out guidelines to enable SUEZ to plan for and respond to internal and external emergencies.

Emergency drills of the ERP are to be conducted in accordance with the *Emergency Management Procedure*.

4. Waste Acceptance and Stockpiling

4.1. Wastes accepted at Wetherill Park Resource Recovery Facility

The WPRRF is a solid waste premise on which waste is treated, or sorted pending final disposal.

For information on weighbridge operation (e.g. money handling, computer systems, and contact numbers) and forms required for the acceptance of waste, refer to the relevant *Waste Acceptance and Weighbridge Manual.*

4.2. Acceptance of Waste

The incoming waste delivery vehicles are weighed and provided with ticket at the site weighbridge before proceeding to the tipping location dependant on the waste type. All waste is delivered to the transfer station shed and tipped in allocated areas.

An excavator with a grab is used to sort recyclables from incoming waste streams. The recyclable portions of the waste are then separated and stored in bins. Inert waste and recyclable materials (non-odourous) to remain onsite until a bin of a particular product has been filled, after which it is removed from site to an appropriate recycling facility.

The general waste is then pushed into the surge pit with the use of a front end loader, it tis then crushed and compacted by the use of the Dozer.

General Solid Waste (Putrescible) must not be pushed into the surge pit until ready for transportation off site, it must not remain on site longer than 24 hours, with a receival limit of 10,000 tonnes per annum.

Transfer trailers access the load out tunnel where the waste is loaded with the use of the Dozer and is gravity fed into the top of the trailers

Waste is only to be transported to the appropriate landfill in accordance with their EPA licence.

Note that where waste does not conform to the specific **type, activity or quantity limit** in **Appendix 2.** – the waste is removed from the site by the vehicle delivering the waste or, where that is not possible, stored in an isolated quarantined storage area or container and removed to an appropriately authorised facility as soon as practicable. The rejection of loads must be recorded as per the *Waste Acceptance and Weighbridge Manual.*

4.2.1. Specific Requirements – General Solid Waste (Putrescible)

WPRRF segregates the General Solid Waste (Putrescible) from the main stream waste received within the transfer shed, the General Solid Waste (Putrescible) is not to be pushed into the surge pit until ready for transportation off site, which must be within the 24 hours period of receiving the waste onto site, as set out in the Operating conditions in **Appendix 3.**

4.3. Stockpiles

The authorised amount of waste permitted on the premises cannot exceed 2,400 tonnes at any one time, this monitored on the Transfer Station Weekly Checklist.

This is monitored by the monthly reporting into the New South Wales Waste and Resource Reporting Portal (WARRP), this is the Environmental Protection Authority's web tool for waste operators to carry out their waste reporting obligations.

5. Environmental Management and Monitoring

All monitoring activities set out in this section must comply with the requirements of the *Monitoring and Measuring Procedure* and the *Incident Reporting and Corrective Actions Procedure*.

5.1. General

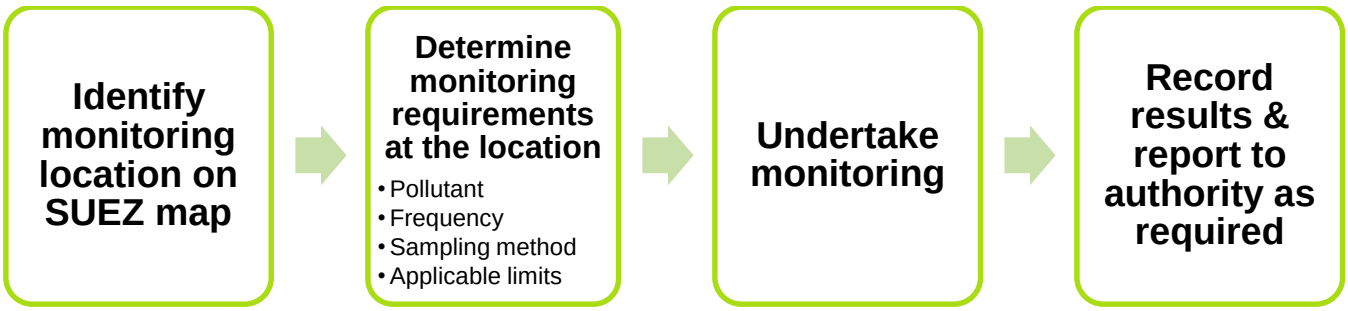


Figure 3 Summary of the monitoring process at Wetherill Park Resource Recovery Facility.

The responsibilities of SUEZ workers are outlined within the relevant Standard Operating Procedures (SOPs) and Work Instructions (WIs) outlining the operations. The overall responsibility for environmental management at WPRRF rests with the Site Manager, including the requirement to ensure that all onsite activities are undertaken in accordance with the Licence.

5.2. Records

All monitoring records referenced in this section must be maintained in accordance with the *Records Management Procedure* and:

- Be in a **legible form**, or in a form that can readily be reduced to a legible form (if amendments are made they should be made in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
- Kept for a least **6 years** after the monitoring or the event to which they relate took place (or until the expiry of the Licence or subsequent Licence);
- All off-site environmental effects and matters which affect the condition of the land or waters must be retained until the expiry of the Licence and any subsequent licence; and
- Be able to be **produced** in a legible form **to any authorised officer of the EPA** who asks to see them.

5.3. Monitoring Locations

All monitoring required of the facility (see **Appendix 4.** for monitoring requirements) is completed using the onsite weighbridge and Mandalay System.

5.4. Operational Requirements

All plant must be maintained to the manufacturer's specification and any relevant internal management system, in accordance with the *Plant Management SOP.* The calibration of equipment must occur in accordance with the *Calibration and Servicing of Equipment SOP.*

All spills that occur outside a bunded area (or engineered containment system) must be recovered immediately, or removed and disposed of environmentally hazardous materials in a responsible manner.

In the event of an environmental incident which can cause to the health or safety of human beings or the environmental which is not trivial, and/or results in monetary loss or damage costing an amount exceeding $20,000 (Cost to include cleaning up/further pollution mitigation measures). The WPRRF Pollution Incident Response Management Plan is to be activated.

In accordance with the Licence 4548, WPRRF is only permitted to receive, handle and store the wastes in **Appendix 2.** prior to removal offsite. Further it is a requirement that all wastes are stored and sorted on a hardstand which is bunded to prevent run-off; and removed to a facility licenced under the *Environmental Protection Act 1986.* See **Appendix 3.** for further information on General Solid Waste (Putrescible) processing limits.

5.5. Leachate

The management of leachate is to be conducted in accordance with the requirements set out in the *Leachate Management SOP.* The purpose of effective leachate management is to ensure that leachate does not leave the site and contaminate stormwater, water courses or ground water.

5.5.1. Management Strategy

WPRRF implements all practical measures to contain leachate and treat onsite through the trade waste system. The majority of the site has been sealed so that water that may have leached through waste is contained and treated.

All covered areas drain to the trade waste system. The water from the site passes through a collection or separator pit, and then to the to trade waste treatment system, which modifies the quality of the effluent so that it complies with the Trade Waste Agreement (see **appendix 6.**)

Surface water runoff from all non-contaminated areas, including all roadways, landscaped areas and runoff entering the surge pit from the initial stages of rainfall events "First flush" rainwater is directed to two above ground first flush storage tanks for subsequent pumping into the trade waste system. Once these tanks are full of stormwater, pumps within the pit are engaged ro direct the clean stormwater to the local stormwater system.

All other water on site is collected through various drains and filters before ending up in sumps. These sumps have pumps that work on a float system to automatically turn on. The pumps transfer water to the water treatment facility in the SUEZ yard where it is treated before discharge to sewage.

5.5.1. Infrastructure and Collection

Primary infrastructure at WPRRF includes:

- Filters;
- Sumps with pumps; and
- Drainage system.

5.5.2. Monitoring Requirements

Monitoring and inspections checks for these are included on the site *Weekly Checklist*.

5.5.3. Notification Requirements

If leachate is released or discharged in a manner that breaches the site licenced the EPA must be notified in writing within 7 days of the date on which the incident occurred. (see **Appendix 5.**).

5.6. Water

Water is to be managed in accordance with the requirements set out in the *Water Management SOP.* The purpose of water management is to ensure that site activities don't impact off site and cause pollution or contamination of stormwater, water courses or ground water.

5.6.1. Stormwater

5.6.1.1. Management Strategy

WPRRF implements all practical measures to prevent stormwater becoming contaminated by the activities onsite and treats contaminated or potentially contaminated stormwater prior to being discharged from the site.

The site keeps a high level of housekeeping and ensures that water from sealed sections of site is directed to the treatment and storage area in the SUEZ yard.

5.6.1. Firewater

5.6.1.1. Management Strategy

In the event of a fire on site WPRRF implements all practical measures to prevent firewater from discharging from the site prior to treatment.

5.7. Air and Dust

The management of air and dust is to be conducted in accordance with the requirements of the *Site Maintenance – Infrastructure Facilities.* The purpose of dust management is to ensure that the neighbouring properties are not adversely affected by dust produced by site operations.

5.7.1. Management Strategy

Potential dust nuisance from the waste streams is controlled through simultaneous dust and odour misting system that automatically runs in the transfer shed. The misting system drops mist from the ceiling of shed either in auto or manual mode. The site also has access to water and hoses to wet down waste on the hard stand if necessary.

Dust created from road use is controlled by maintaining the roads in good conditions, road sweeping and cleaning with bob cat.

Dust and air are also monitored by a 3rd party to show that both dust isn't affecting neighbours and that dust levels are appropriate for occupational health.

5.7.2. Infrastructure and Collection

Deodouriser Dust Suppression System consists of:

- Ceiling piping infrastructure;
- Nozzels; and
- Pump.

The odour and dust misting system is checked on a weekly basis via the Transfer Station Weekly checklists.

5.7.3. Notification Requirements

If dust is released or discharged in a manner that breaches the site licenced the EPA must be notified in writing within 7 days of the date on which the incident occurred. (see **Appendix 5)**

5.8. Odour

The management of odour is to be conducted in accordance with the requirements set out in *Odour Management SOP*. The purpose of odour management is to ensure that the neighbouring properties are not adversely affected by odour from on-site operations.

5.8.1. Management Strategy

Potential odour nuisance from waste streams is controlled as mentioned above through a Deodouriser Dust Suppression System. The site can use different masking odours which are automatically added into the misting system.

The site clears waste on a daily basis to meet both the site licence and to ensure that odorous waste isn't left siting in the yard. Additionally, the site clears General Solid Waste (Putrescible) within a 24-hour period of receipt.

5.8.2. Infrastructure and Collection

Deodouriser Dust Suppression System consists of:

- Ceiling piping infrastructure;
- Nozzels; and
- Pump.

The odour and dust misting system is checked on a weekly basis via the Transfer Station Weekly checklists.

5.8.3. Notification Requirements

If an offensive odour is emitted beyond the boundary of the premises in a manner that breaches the site licenced the EPA must be notified in writing within 7 days of the date on which the incident occurred. (see **Appendix 5)**

5.9. Litter

The management of litter is to be conducted in accordance with the requirements of the *Site Maintenance – Infrastructure Facilities SOP*. The purpose for control and management of litter is to ensure that the local amenity isn't affected by wind-blown litter.

5.9.1. Management Strategy

The site has a purpose built litter fence in addition to other site fences to prevent litter from leaving the site. The site also follows housekeeping standards and makes sure litter is cleaned up on a routine basis.

5.9.2. Monitoring Requirements

The following checks are completed using the Transfer Station Weekly Checklist to ensure litter is controlled;

- Roads and entrance/exit checked for litter;
- Fences in good condition; and
- Housekeeping standards adequate.

5.10. Noise

The management of noise is to be conducted in accordance with the requirements of the *Site Maintenance – Infrastructure Facilities SOP*. The purpose of noise management is to ensure that no loss of amenity is caused to neighbours from noisy operations on site or risk to the health and safety of workers on site

5.10.1. Management Strategy

The site equipment and activities are conducted to prevent adverse noise levels. Appropriate and well maintained equipment on site. Noise monitoring is completed by a 3rd party to check levels at boundary and to ensure appropriate levels for occupational health.

5.11. Pests and Vermin

The management of pests and vermin is to be conducted in accordance with the requirements of the *Site Maintenance – Infrastructure Facilities SOP.* The purpose of pest and vermin management is to reduce the impact on amenity to neighbours and the community caused by pests and vermin on site.

5.11.1. Management Strategy

The site uses various methods and strategies to prevent pests and vermin. There are various strategies that are following routinely to prevent pests and vermin, including:

- Containment of waste.
- Removal of waste on a daily basis.
- Emptying of bins on site regularly.
- Litter/waste clean-up.
- Adequate housekeeping.
- Rat and mouse baiting.

The following are strategies that will be implemented if/when required.

- Target pest and vermin treatments.

5.11.2. Infrastructure and Collection

Infrastructure assisting in pest and vermin control include:

- Security fencing around site
- External 3rd party conduct site monitoring 6 weekly.

5.12. Fire Detection

Fire detection and early control of fires is important in the waste industry to prevent environment pollution from the burning of waste. The WPRRF has a fire sprinkler system installed above the surge pit within the transfer station with a back to base fire alarm system. There are fire extinguishers, hose reels and hydrants located around the site, this includes the load out tunnel and recycling plant. The purpose of the fire detection is to ensure the authorities and site personnel are notified as early as possible to the risks to workers, neighbours and the environment.

5.12.1. Management Strategy

WPRRF is committed to managing the risk of fire. The site implements all practical measures to prevent fires on site, including providing feedback to customers on hazardous wastes, clearing the waste on a daily basis and remaining vigilant during waste acceptance. WPRRF conducts 6 monthly fire equipment inspections, annual fire statement, annual sprinkler and hydrant flow tests, and conducts a 5 yearly hydrostatic test, all by a qualified 3rd party.

All Operators are trained in basic firefighting skills, there are trained wardens on site

5.12.2. Sampling Equipment and Instructions

Equipment is tested as per the Australian Standard for inspection and testing frequencies.

5.12.3. Notification Requirements

If a fire occurs in a manner that breaches the site licenced the EPA must be notified in writing within 7 days of the date on which the incident occurred. (see **Appendix 5)**

6. Definitions

Act – means the *Environmental Protection Act 1986.*

Annual Period – means the inclusive period from 1 July until 30 June in the following year.

Averaging Period – means the time over which a limit is measured or a monitoring result is obtained.

C&D Waste – materials in the waste stream which arise from construction, refurbishment or demolition activities (as defined in the *WA DEC publication Landfill Waste Classification and Waste Definitions 1996).*

C&I Waste – Commercial and industrial waste that is produced by institutions and businesses (e.g. restaurants, schools, offices and manufacturing industries).

Clean Fill – material that will have no harmful effects on the environment and which consists of rocks or soil arising from the excavation of undisturbed material. For material not from a clean excavation, it must be validated to have contaminants below relevant ecological investigation levels (as defined in the document Assessment Levels for soil, Sediment and Water, Department of Environment, 2003). According to the *WA DEC publication Landfill Waste Classification and Waste Definitions 1996.*

Controlled Waste – means a waste listed in Schedule 1 (as defined by *Environmental Protection (Controlled Waste) Regulations 2004).*

Hardstand – means a surface with a permeability of 10-9 metres/second or less.

Hazardous Waste – component of the waste stream by which its characteristics poses a threat or risk to public health, safety or the environment (includes substances which are toxic, infections, mutagenic, carcinogenic, teratogenic, explosive flammable, corrosive, oxidising and radioactive) (as defined in the *WA DEC publication Landfill Waste Classification and Waste Definitions 1996).*

Inert Waste Type I – non-hazardous, non-biodegradable (half-life greater than 2 years) waste containing contaminant concentrations less than Class 1 landfill acceptance criteria but excluding paper and cardboard (paper and cardboard are biodegradable and are therefore considered as putrescible waste), and materials that require treatment to render them inert (e.g. peat, acid sulfate soils) (as defined in the *WA DEC publication Landfill Waste Classification and Waste Definitions 1996).*

Inert Waste Type II - Wastes consisting of non-biodegradable organic materials such as tyres and plastics, which require special management to reduce the potential for fires (as defined in the *WA DEC publication Landfill Waste Classification and Waste Definitions 1996).*

Licence – means the Licence numbered 4548 and referred to in **Appendix 1.**

Putrescible waste – General Solid Waste which meets the definition (as defined in *Part 3 of schedule 1 of the Protection of the Environment Operations Act 1997*)

Solid Waste – Waste which meets the definition of solid (as defined in the *WA DEC publication Landfill Waste Classification and Waste Definitions 1996).*

Solid – Material that:

(a) has an angle of repose of greater than 5 degrees; and

(b) does not contain, or is not comprised of, any free liquids; and

(c) does not contain, or is not comprised of, any liquids that are capable of being released when the waste is transported;

(d) does not become free flowing at or below 60 degrees Celsius or when it is transported; and

(e) is generally capable of being moved by a spade at normal temperatures (i.e. is spadeable)

(as defined in the *WA DEC publication Landfill Waste Classification and Waste Definitions 1996*).

Leachate – A liquid that has percolated through and/or been generated by decomposition of waste material. It includes water that comes into contact with waste and is potentially contaminated by nutrients, metals, salts and other soluble or suspended components and products of decomposition of the waste.

7. Related Documents

DOCUMENT NAME	REFERENCE
Environment Policy	POL001
Legislative and Other Requirements	PROC001
Legislative Register – Environmental	REG005
Site Document Manifest	REG013
Document Control Procedure	PROC004
Environmental Management Plan	PLANS004
Emergency Response Plan (includes Pollutant Incident Response Management Plan)	PLANS003
Traffic Management Plan	PLANS002
Site Maintenance	SOP041
Utility Services	SOP102
Environmental Complaints Management	SOP066
Incident Reporting and Corrective Action Procedure	PROC008
Waste Acceptance Manual	MAN011
Monitoring and Measuring Procedure	PROC007
Contractor and Visitor Control Procedure	PROC013
Records Management	PROC009
Contractor and Visitor Control Procedure	PROC013
Water Management	SOP069
Odour Management	SOP065
Snakes, Spiders, Ticks and Fire Ants	SOP054
Emergency Management Procedure	PROC005
Management Systems Review	PROC012
Audit Procedure	PROC010

DOCUMENT NAME	REFERENCE
Roles and Responsibilities Procedure	PROC019
Traffic Management	SOP012
Plant Management	SOP085
Asbestos Waste	SOP029
Weekly Checklist	FORM026

8. Review and Document Control

VERSION	CHANGE	REVIEWED	AUTHORISED	DATE ISSUED
1	Initial Issue.	Jacquie Simmons		

9. Appendices

APPENDIX 1. Environment Protection Licence, 4548

Section 55 Protection of the Environment Operations Act 1997

Environment Protection Licence

Licence - 4548

NSW EPA

Licence Details	
Number:	4548
Anniversary Date:	15-June

Licensee
SITA AUSTRALIA PTY LTD
20 DAVIS ROAD
WETHERILL PARK NSW 2164

Premises
WETHERILL PARK RESOURCE RECOVERY FACILITY
20 DAVIS ROAD
WETHERILL PARK NSW 2164

Scheduled Activity
Waste Processing (non-thermal treatment)
Waste Storage

Fee Based Activity	Scale
Non-thermal treatment of hazardous and other waste	Any T treated
Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	> 0 T stored
Waste storage - other types of waste	> 0 T stored

Region
Waste & Resources - Waste Management
59-61 Goulburn Street
SYDNEY NSW 2000
Phone: (02) 9995 5000
Fax: (02) 9995 5999
PO Box A290 SYDNEY SOUTH
NSW 1232

Environment Protection Authority - NSW
Licence version date: 4-Aug-2015

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APPENDIX 2. Waste Acceptance Type and Quantity Limits

Code	Waste	Description	Activity	Other Limits
NA	Office and Packaging Waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	Maximum of 10,000 tonnes to be received per 12 months.
NA	Virgin excavated natural material	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
NA	Garden waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
NA	Wood waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
NA	Waste mineral oils unfit for their original intended use	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
N/A	Gas bottles		Waste storage	NA
D220	Lead acid batteries	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
F100	Waste ink, dye, pigment, paint, lacquer & varnish	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
NA	Asbestos waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
NA	Building and demolition waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
NA	Household waste from municipal clean-up that does not contain food waste	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
NA	Waste collected by or on behalf of local councils from street sweeping	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA
NA	Non-chemical waste generated from manufacturing and services (including metal, timber, paper, ceramics, plastics, thermosets, and composites)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste storage	NA

Source: Department of Environment Protection Authority – Licence

Licence: 4548 ***Licence Issue Date:*** 4th August 2015

APPENDIX 3. Waste Management – General Solid Waste (Putrescible)

O6 Waste management

General Solid Waste (putrescible)

O6.1 The licensee must keep general solid waste (putrescible) in a separate designated area from all other wastes received at the Premises.

O6.2 General solid waste (putrescible) must not be mixed with any other wastes received at the Premises.

O6.3 The licensee must remove all general solid waste (putrescible) within 24 hours of it being received at the Premises.

Source: Department of Environment Protection Authority – Licence

Licence: 4548 ***Licence Issue Date:*** 4th August 2015

APPENDIX 4. Monitoring Requirements

M4 Other monitoring and recording conditions

Monitoring of waste(s) received

M4.1 The licensee must record the following information for each load of waste(s) received at the premises:
(a) the registration number of the vehicle;
(b) the time and date of receipt of the waste;
(c) the source of the waste;
(d) the type(s) of waste; and
(e) the quantity of each type of waste (in tonnes).

Source: Department of Environment Protection Authority – Licence

Licence: 4548 ***Licence Issue Date:*** 4th August 2015

APPENDIX 5. Notification Requirements

R2 Notification of environmental harm

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

Source: Department of Environment Protection Authority – Licence

Licence: 4548 ***Licence Issue Date:*** 4th August 2015

APPENDIX 6. Consent to Discharge – Sydney Water

Consent to Discharge Industrial Trade Wastewater

SYDNEY WATER CORPORATION

and

SITA AUSTRALIA PTY LTD
A.C.N. 002 902 650
Trading as

SITA ENVIRONMENTAL SOLUTIONS

A.B.N. 70 002 902 650

ACTIVITY: WASTE TRANSFER STATION (GE08)

RISK INDEX: 06

CONSENT NO: 7976

CONNECTION NO: 1

PROPERTY NUMBER: 4477822

This **CONSENT** is made on day: 4 month: 6 year: 2013
Executed for and on behalf of
Sydney Water Corporation

By

(Signature)

Philip HALKYARD

Manager Business Customer Delivery

In the presence of:

Witness

(Signature)

J.K. HARTIKAINEN

(Print name of witness)

Executed for and on behalf of
the Customer:

(Signature)

Ian Baker

(Print name and position of person signing)
who warrants s/he has sufficient authority to execute this consent.

By

In the presence of:

Witness

(Signature)

Jacqui Salmon

(Print name of witness)

This consent must be executed by the Customer prior to execution by Sydney Water and submitted by the Customer to Sydney Water for its consideration. Submission of a consent executed by the Customer under no circumstances obliges Sydney Water to enter into or complete the consent. Submission of an executed consent by the Customer constitutes an application for a consent which Sydney Water may in its reasonable discretion reject, or with the consent of the Customer modify any of the proposed terms thereto.

Source: Sydney Water Corporation – Consent to Discharge

Consent: 7976 ***Licence Issue Date:*** 4th June 2013

APPENDIX 7. Reporting and Notification Forms

Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

SECTION A
LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name: Trading as:	ABN:
Reporting period: _____ to _____	

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes ☐ Please proceed to Section C

No ☐ Please proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).

Initial:

SECTION B
DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each Licence condition that was not complied with.

a) Licence condition not complied with:
b) Date(s) when the non compliance occurred, if applicable:
c) Was this non compliance reported to DER?:
☐ Yes ☐ Reported to DER verbally Date _____ ☐ Reported to DER in writing Date _____ ☐ No
d) Has DER taken, or finalised any action in relation to the non compliance?:
e) Summary of particulars of the non compliance, and what was the environmental impact:
f) If relevant, the precise location where the non compliance occurred (attach map or diagram):
g) Cause of non compliance:
h) Action taken, or that will be taken to mitigate any adverse effects of the non compliance:
i) Action taken or that will be taken to prevent recurrence of the non compliance:

Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:

SECTION C

SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the licence holder is		The Annual Audit Compliance Report must be signed and certified:
An individual	□	by the individual licence holder, or
	□	by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	□	by the principal executive officer of the licensee; or
	□	by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	□	by affixing the common seal of the licensee in accordance with the *Corporations Act 2001*; or
	□	by two directors of the licensee; or
	□	by a director and a company secretary of the licensee, or
	□	if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or
	□	by the principal executive officer of the licensee; or
	□	by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	□	by the principal executive officer of the licensee; or
	□	by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	□	by the chief executive officer of the licensee; or
	□	by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of $50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: _____ SIGNATURE: _____

NAME: (printed) _____ NAME: (printed) _____

POSITION: _____ POSITION: _____

DATE: _____/_____/_____ DATE: _____/_____/_____

SEAL (if signing under seal)

Licence: L7384/1999/8 Licensee: West Australian Landfill Services Pty Ltd
Form: N1 Date of breach:

Notification of detection of the breach of a limit.

These pages outline the information that the operator must provide.
Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

Part A

Licence Number	
Name of operator	
Location of Premises	
Time and date of the detection	

Notification requirements for the breach of a limit	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Licence: L7384/1999/8 Licensee: West Australian Landfill Services Pty Ltd
Form: N1 Date of breach:

Notification of detection of the breach of a limit.

These pages outline the information that the operator must provide.
Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

Part A

Licence Number	
Name of operator	
Location of Premises	
Time and date of the detection	

Notification requirements for the breach of a limit	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Part B

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission.	
The dates of any previous N1 notifications for the Premises in the preceding 24 months.	

Name	
Post	
Signature on behalf of West Australian Landfill Services Pty Ltd	
Date	

Source: Department of Environment Regulation – Licence

Licence: L7384/1999/8 ***Licence Issue Date:*** Thursday, 7 April 2016