

# **Construction Environmental Management Plan**

## **Penrith Waste Recycling and Transfer Facility | 46-48 Peachtree Road, Penrith**

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Prepared for Benedict Recycling Pty Ltd

April 2025

# Construction Environmental Management Plan

## Penrith Waste Recycling and Transfer Facility | 46-48 Peachtree Road, Penrith

Benedict Recycling Pty Ltd

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April 2025

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Approved by



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16 April 2025

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# TABLE OF CONTENTS

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<b>1</b>	<b>Introduction</b>	<b>1</b>
1.1	Project overview	1
1.2	CEMP purpose and objectives	1
1.3	CEMP framework and approval	3
1.4	Project environmental assessment and approval overview	3
1.5	Project Staging	4
1.6	Project schedule	4
<b>2</b>	<b>Project overview</b>	<b>5</b>
2.1	Project description	5
2.2	Project setting	6
2.3	Construction works	6
<b>3</b>	<b>Legislative and other requirements</b>	<b>9</b>
3.1	Statutory requirements	9
<b>4</b>	<b>Implementation and operation</b>	<b>19</b>
4.1	Environmental roles and responsibilities	19
4.2	Training and awareness	21
4.3	Communication	22
4.4	Documentation	24
<b>5</b>	<b>Management of key environmental aspects and risks</b>	<b>27</b>
5.1	Noise management and control measures	27
5.2	Water	29
5.3	Air quality	31
5.4	Greenhouse gases	32
5.5	Heritage	33
5.6	Traffic and transport	34
5.7	Visual	35
5.8	Waste	35
5.9	Contamination	36
5.10	Hazardous goods, spills and leaks	37
5.11	Public safety	38
<b>6</b>	<b>Environmental management systems</b>	<b>39</b>
6.1	Safe Work Method Statements (or equivalent)	39

6.2	Monitoring and measurement	39
6.3	Audits and inspections	39
6.4	Non-conformance and corrective actions	40
<b>7</b>	<b>Environmental incidents and emergencies</b>	<b>41</b>
7.1	Public complaints	41
7.2	Incident response	41
7.3	Emergency management	42
	<b>References</b>	<b>43</b>

## Appendices

Appendix A	Construction traffic management plan	A.1
Appendix B	Erosion and sediment control plan	B.1
Appendix C	Facility plans and drawings	C.1

## Tables

Table 1.1	Summary of Modifications	3
Table 1.2	Indicative project schedule	4
Table 2.1	Key project elements	5
Table 2.2	Construction activities and staging	7
Table 2.3	Construction activities	8
Table 3.1	Development consent SSD 7733 conditions relevant to CEMP	11
Table 3.2	Applicants management and mitigation measures	17
Table 4.1	Key internal and stakeholder contacts	23
Table 4.2	Summary of additional notification, consultation and approval requirements	25
Table 5.1	Noise and vibration management and control measures	27
Table 5.2	Water management and control measures	30
Table 5.3	Air quality management and control measures	32
Table 5.4	Greenhouse gas management and control measures	33
Table 5.5	Traffic and transport management and control measures	34
Table 5.6	Visual management and control measures	35
Table 5.7	Waste management and control measures	35
Table 5.8	Contamination measures	37
Table 5.9	Hazardous goods, spills and leaks management and control measures	38
Table 5.10	Public safety management and control measures	38
Table 7.1	Emergency contact details	42

## Figures

Figure 1.1	Site layout plan	2
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# 1 Introduction

## 1.1 Project overview

Benedict Recycling Pty Ltd (Benedict Recycling) is developing a waste recycling and transfer facility (the facility) at 46-48 Peachtree Road, Penrith (the site) in the Penrith local government area (LGA) (the project). The facility will operate as a waste transfer station with a capacity of up to 180,000 tonnes per annum (tpa) of general solid waste (non-putrescible) including pre-classified waste types including sorting, storage and dispatch of materials to other facilities. Site location, boundaries and indicative site layout are shown in Figure 1.1 and further described in Section 2.

This Construction Environmental Management Plan (CEMP) has been developed to meet the requirements of Condition C1 of development consent SSD 7733 and Mod-1, as consolidated. The CEMP applies to site establishment and construction activities of the project.

Unless specifically noted otherwise, references to plans and consent conditions in this document and Appendix documents are referring to SSD 7733.

Construction activities associated with the project will include fencing, concrete/asphalt works (e.g. internal roads, yard, parking area and perimeter curb), construction of the waste transfer holding shed (the shed), waste stockpiling areas, weighbridges, wheel-washes, internal sprinkling site irrigation system, installation of demountable offices and amenities, and landscaping. Minor ground disturbance and excavation is anticipated, which will involve the installation of anchors for the demountable lunchroom and amenities, footings for fencing, as well as for footings for the waste transfer holding shed. The site has existing utilities and stormwater connections.

The Consent was modified on 19 December 2024 (SSD-7733-Mod-2). The modification includes minor updates to the building design to accommodate fire exits, pathways, additional exit weighbridge and office, increased rainwater tank capacity from 4,000L to 90,000L, installation of a new 15,000L underground diesel tank, addition of Colorbond cladding to the top 3 meters of the masonry wall facing the street frontage, and other minor layout and design changes. The construction works will be undertaken in two stages.

## 1.2 CEMP purpose and objectives

The CEMP has been developed to meet the following objectives:

- describe the environmental management systems and practices to be implemented by Benedict Recycling employees and contractors during the construction phase of the project
- provide an overarching framework for the construction works; by outlining the steps for taking a structural approach to the management of on-site environmental aspects and risks during the construction phase
- set out clear roles and responsibilities for management and operational personnel, and outline the inductions and training, requirements, management procedures and measures, that direct all on-site personnel
- describe how Benedict Recycling will implement monitoring programs and manage potential environmental impacts during the construction phase of the project; in accordance with applicable legislative requirements, external approvals and associated conditions of approval
- to comply with the requirements of the consent, as consolidated, particularly condition C2.





### 1.3 CEMP framework and approval

The CEMP provides the link between planning and execution of construction activities and progressive updates to the development. The CEMP will ensure that approval conditions under development consent SSD 7733 (as consolidated) and obligations under applicable legislative requirements are transferred into clear and practical action. The conditions of consent, and where they are addressed in the CEMP, are outlined in Section 3.1.3. Relevant legislative requirements are outlined in Section 3.

This CEMP will be submitted for approval to the NSW Department of Planning, Housing and Infrastructure (DPHI) Secretary prior to the commencement of construction and revised and approved as required.

The CEMP will take effect prior to the commencement of site establishment and construction activities.

### 1.4 Project environmental assessment and approval overview

On 15 May 2020, Development Consent SSD 7733 was granted by the Minister for Planning and Public Spaces for the development of the Penrith Waste Recycling and Transfer Facility.

The environmental impact statement (EIS) for the project was sought under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as a state significant development (SSD) in June 2017. The EIS was prepared in accordance with Secretary's environmental assessment requirements (SEARs), Clauses 71 and 72 of the Environmental Planning and Assessment Regulation 2000 (EP&AR) and advice provided by Penrith City Council (Council) following a pre-development application meeting.

The EIS was placed on exhibition for seven weeks from 30 June 2017 to 14 August 2017 (45 days), and subsequently a Response to Submissions (RTS) report was prepared to respond to the submissions received from the community, including various NSW government agencies, Council and non-government organisations, during the public exhibition period.

Potential environmental impacts and control measures outlined in the EIS, RTS and Appendix 2 of development consent SSD 7733 (Applicants Management and Mitigation Measures) have been taken into consideration and incorporated into this CEMP.

Since 2020, the development consent has been modified on two occasions. Table 1.1 Provides description and approval dates for the modifications.

**Table 1.1 Summary of Modifications**

Modification	Description	Approval Date
SSD 7733 – Mod 1	Change in building material for external walls from partly Colorbond metal to full-height masonry walls	05 May 2021
SSD 7733 – Mod 2	Minor modifications to the building design to accommodate fire exits and pathways, additional exit weighbridge and office, increased rainwater tank capacity from 4,000L to 90,000L, installation of a new 15,000L underground diesel tank, addition of Colorbond cladding to the upper 3 meters of the masonry wall facing the street frontage, and other minor layout and design changes	19 December 2024

## 1.5 Project Staging

In accordance with Condition A16, Benedict Recycling intend on staging the project. Under the staging report it was identified that the construction activities on the site will be undertaken in two stages.

Stage 1 will consist of demolition of existing structures on site, site establishment works and installation of building wall footings. Stage 2 will comprise of acoustic fencing, relocation/protection of services, utilities, shed and amenities, construction of demountable structures and purpose-built areas, finishing works and landscaping.

## 1.6 Project schedule

Site establishment and construction works are anticipated to commence in the second quarter of 2025 and to last end of quarter 2025. An indicative program is provided in Table 1.2 **Error! Reference source not found.**, and a further breakdown of construction activities is outlined in Section 2.3.

**Table 1.2 Indicative project schedule**

Activity	2025		
	Stage 1 - Q2	Stage 2 - Q3	Stage 2 - Q4
Stages			
Site establishment	X		
Site Preparation and minor earthworks	X		
Acoustic Fencing		X	
Relocation and or protection of services		X	
Surface water management system	X		
Concrete works for shed wall footings	X		
Shed and amenities		X	X
Utilities		X	X
Construction demountable structures and purpose-built areas		X	X
Finishing works and landscaping			X
Security fencing	X		
Replacing the approved 4,000 L water tank with a 90,000 L underground tank		X	
Installing 15,000 L underground diesel tank		X	
Relocating and installation of weighbridges		X	
Cladding the top 3 meters of the masonry wall in Colorbond			X



## 2 Project overview

### 2.1 Project description

The project is located at 46-48 Peachtree Road, Penrith, legally described as Lot 45 DP 793931. The site comprises of 4,367 square metres (m<sup>2</sup>) of flat terrain and is situated within an industrial estate. The facility will be within an enclosed shed, except for the weighbridge areas, carpark and front landscape area.

The project will import inert general solid waste (non-putrescible) such as construction and demolition wastes, and selected commercial and industrial wastes, for sorting to extract recyclable materials as well as waste streams that will require further processing at other recycling facilities. The recyclable materials extracted will include metals, dry paper/cupboard, brick and concrete, timber (engineered and natural), gyprock, soil-rich “heavies” and “lights” both requiring further processing at Benedict-owned facilities. Non-recyclable residues will also be produced and will be disposed of at an offsite Environment Protection Authority (EPA) licensed landfill.

No special liquid, hazardous, restricted solid waste or general solid waste (putrescible), as defined in the NSW *Protection of the Environment Operations Act 1997* (POEO Act) and EPA (2014), would be accepted at the facility. All of the materials brought onto the site will be taken from the site as recyclable products or as rejects for disposal at an EPA licensed landfill. There would be no materials land-filled or otherwise disposed of within the site.

Key elements of the project are summarised in Table 2.1.

Construction activities will involve site establishment, minor excavation for foundation works for the site components, minor amendments to building design and installation of underground water and diesel tank. These have been identified in the following table.

**Table 2.1** Key project elements

Project element	Project description
Maximum throughput tonnage	180,000 tonnes of waste per annum
Site components	<ul style="list-style-type: none"><li>• Waste processing and stockpiling shed;</li><li>• segregated heavy waste (timber, brick/concrete and metal) and stockpiling area in bins also along the southern boundary;</li><li>• parking area;</li><li>• 2 weighbridge areas with 4 weighbridges, a wheel-wash for outbound trucks</li><li>• demountable offices and amenities;</li><li>• site security fencing;</li><li>• internal shed misting system to minimise airborne dust; and</li><li>• the entire site would be sealed (asphalt or concrete) with a perimeter curb</li><li>• minor amendments to the building design to accommodate fire exits and pathways</li><li>• additional exit weighbridge and office</li><li>• 90,000L underground water tank would be installed to replace the approved 4,000L tank</li><li>• installation of a new 15,000L underground diesel tank</li><li>• top 3 meters of the masonry wall along the street boundary would also be clad in Colorbond.</li></ul>
Hours of construction	<ul style="list-style-type: none"><li>• 7 am to 6 pm, Monday to Friday;</li><li>• 8 am to 1 pm, Saturday; and</li><li>• no works to be undertaken on Sundays or public holidays.</li></ul> <p>Activities outside standard construction hours may be permitted where there is a safety requirement or emergency work needs to be undertaken.</p>

Project element	Project description
Hours of operation	<p>Accept waste deliveries and dispatch materials:</p> <ul style="list-style-type: none"> <li>• 6 am to 10 pm, Monday to Friday;</li> <li>• 6 am to 6 pm, Saturday; and</li> <li>• 8 am to 4 pm on Sunday.</li> </ul> <p>There will be no waste deliveries and dispatch on public holidays.</p> <p>Waste sorting/processing:</p> <ul style="list-style-type: none"> <li>• 6 am to 10 pm, Monday to Friday when there is sufficient demand but normally 7 am to 4 pm; and</li> <li>• 7 am to 6 pm on Sunday.</li> </ul> <p>There will be no sorting on Sundays or public holidays.</p>
Transport and access during the construction phase	<ul style="list-style-type: none"> <li>• Access will be via Peachtree Road.</li> <li>• All work vehicles will be parked within the site.</li> </ul> <p>Construction traffic will average approximately 40 daily movements (10 light vehicles and 10 heavy vehicles) for the construction period.</p>

## 2.2 Project setting

The site is ideally suited for the development of a waste recycling and transfer facility because it is zoned E4 General Industrial pursuant to the Penrith Local Environmental Plan 2010 (Penrith LEP).

The site is readily accessible to light and heavy vehicles and is situated on the northern side of a two-lane road (Peachtree Road) which is a loop road that provides access to an industrial estate off Castlereagh Road. The site is surrounded to the east, west and south by factory units, a cleared and levelled block to the north-west and Bunnings hardware store to the north-east. The Peachtree Hotel is about 70 m east of the site and there is a McDonald's restaurant about 100 m east of the site.

The Penrith town centre is located approximately 600 m to the south-east of the site. The nearest residences are about 620 m south-west of the site on the far side of the Main Western Railway/the Western Highway and about 620 m east of the site on Combewood Avenue (Figure 1.1). The nearest natural features are Peach Tree Creek and the Nepean River about 240 m and 400 m west off the site respectively, both of which have associated riparian vegetation.

There are no public recreation areas within the vicinity of the facility. There are no community services such as schools that are closer to the facility than the residences to the south-west. Given that no material impacts are predicted at these residences, no impacts are predicted at any other location.

The site is fully concreted with two sheds currently on site.

The site has existing utilities and stormwater connections.

## 2.3 Construction works

In accordance with Condition C2 (Part C) of development consent SSD 7733, as consolidated, Table 2.2 outlines all activities to be undertaken on-site during the construction of the project.

**Table 2.2 Construction activities and staging**

Activity	Details
Site establishment	<ul style="list-style-type: none"> <li>• Installation of initial environmental controls including public safety signage;</li> <li>• establishment of construction site facilities and access; and</li> <li>• implementation of adequate signage.</li> </ul>
Site preparation and minor earthworks	<ul style="list-style-type: none"> <li>• Deployment of site sediment and erosion controls and pollution management measures in accordance with the Water Management Plan (WMP);</li> <li>• demolition of the existing buildings;</li> <li>• cleaning of all the concrete surfaces</li> <li>• temporary front entrance gate will be in place until permanent structures are installed at a later date; and</li> <li>• deployment of temporary traffic control devices (section 5.6.1).</li> </ul>
Relocation and/or protection services	<ul style="list-style-type: none"> <li>• The site has existing utilities, however consultation with relevant service providers will take place should services require relocation (ie electricity, gas, water and telecommunications infrastructure).</li> </ul>
Surface water management system	<ul style="list-style-type: none"> <li>• Ensure that the run-off continues to be directed towards existing drains.</li> </ul>
Shed and amenities	<ul style="list-style-type: none"> <li>• Construction of waste transfer holding shed and demountable amenities.</li> </ul>
Concrete/asphalt works	<ul style="list-style-type: none"> <li>• Replacing hard surfacing of the site where required in a material such as concrete or bitumen; and</li> <li>• marking on-site parking spaces for staff including two on-site visitor parking spaces, located within the eastern boundary of the site.</li> </ul>
Utilities	<ul style="list-style-type: none"> <li>• Connection to services.</li> </ul>
Construction of demountables, structures and purpose-built areas	<p>Construction and/or installation of the following:</p> <ul style="list-style-type: none"> <li>• 2 weighbridge areas with 4 weighbridges, and wheel was for outbound vehicles;</li> <li>• a demountable weighbridge office with staff amenities;</li> <li>• a misting irrigation system to minimise airborne dust inside the shed;</li> <li>• installation of shed wall and masonry fence; and</li> <li>• waste/product stockpile bays inside the shed.</li> </ul>
Finishing works and landscaping	<ul style="list-style-type: none"> <li>• Removal of any temporary works;</li> <li>• installation of lighting, safety barriers, site security fencing, line markings, Occupational Health and Safety (OHS) signage around the site;</li> <li>• progressive rehabilitation, restoration of frontage landscaping of disturbed/temporary areas; and</li> <li>• site clean-up and disposal of all surplus waste construction material.</li> </ul>

Construction activities will also involve:

- road deliveries of equipment and materials to be used in the construction process; and
- Council or contractor pickup of waste accumulated during the construction process (ie rubbish from employee lunches, green waste, and construction waste).

**Under Modification 2 of the SSD7733 the following changes are to occur on site. These have been captured in Table 2.3.**

Area	Key Changes
Site Entry Area	<ul style="list-style-type: none"> <li>including a fire exit and egress path with a handrail on the east face of the shed</li> <li>moving incoming weighbridges approximately 1 m to the east and subsequently redesigning weighbridge office</li> <li>relocating lunchroom and restroom above the weighbridge office</li> <li>adjusting shed entry/exit doors to align with weighbridges</li> <li>replacing the approved 4,000 L water tank with a 90,000 L underground tank for roof water reuse and stormwater detention</li> <li>installing 15,000 L underground diesel tank</li> <li>including an electrical kiosk.</li> </ul>
Sie Exist Area	<ul style="list-style-type: none"> <li>relocating the western shed wall, reducing street frontage, and adding a fire egress path with two fire exit doors</li> <li>relocating the outgoing weighbridge office to the south-west corner, outside the shed operational area</li> <li>installing two outgoing weighbridges with widened wheel washes, replacing the approved single inground weighbridge</li> <li>adjusting the exit driveway ramp to align with new weighbridge locations</li> <li>adding two parking spaces behind the new weighbridge office</li> <li>repositioning the shed exit doorway to align with weighbridges.</li> </ul>
Shed Layout	<ul style="list-style-type: none"> <li>relocating the ENM storage bay from the western to the eastern side of the shed</li> <li>adjusting the light waste bay to be slightly smaller but more accessible.</li> </ul>
Visual	<ul style="list-style-type: none"> <li>Cladding the top 3 meters of the masonry wall along the street boundary in Colorbond for improved appearance and signage space</li> <li>Removing the front window on the southern elevation</li> <li>Adjusting the palisade fencing and gates accordingly</li> </ul>
GFA	<ul style="list-style-type: none"> <li>Minor reduction in GFA, from 2966.9 m<sup>2</sup> to 2953.9 m<sup>2</sup></li> </ul>

All construction works will be wholly contained within the existing boundaries of the site.

## 3 Legislative and other requirements

### 3.1 Statutory requirements

Key applicable legislation relevant to the project includes, but is not limited to:

- EP&A Act
- EP&A Regulations
- POEO Act
- *Water Management Act 2000* (WM Act)
- *Contaminated Land Management Act 1997* (CLM Act)
- *Rural Fires Act 1997*
- *National Parks and Wildlife Act 1974* (NPW Act)
- *Heritage Act 1997* (Heritage Act).

After reviewing the EIS, Office of Environment and Heritage (OEH) raised no objections and requested no additional information.

The OEH noted that the project does not contain biodiversity, natural hazards or Aboriginal cultural heritage issues. The OEH also provided comment from the Heritage Council of NSW confirming that there are no potential impacts to heritage items within a 1.2 km radius of the site and that a heritage assessment is not required.

An unexpected finds protocol for heritage items is a requirement under conditions B29 and B30 of development consent SSD 7733. The protocol is included in Section 5.9 of this CEMP.

#### 3.1.1 Approvals, permits and licences

As outlined in Section 1.3 of this CEMP the project has been determined under Part 4 of the EP&A Act, with the granting of development consent SSD 7733, which stipulates the conditions and measures to be included in this CEMP, as consolidated.

The project will also be regulated by an Environment Protection Licence (EPL) issued under s48 of POEO Act. Therefore, there are no provisions provided to creating pollution of any type during the planning or execution of the construction work. Under the POEO Act, the following personnel have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- the person carrying out the activity
- an employee or agent carrying out the activity
- an employer carrying on the activity
- the occupier of the premises where the incident occurred.

Notifications must be given immediately in accordance with project approved communications protocols, after the person becomes aware of the incident (see Section 4.3). Only persons engaged in the activity resulting in the pollution incident, and occupiers of the land where the incident occurred, have a duty to report the incident.

### 3.1.2 Compliance policies, standards and guidelines

Environmental aspects and mitigation measures during the construction phase will be undertaken in accordance with the following policies, standards and guidelines:

#### i Noise

- NSW Department of Environment and Climate Change (DECC) 2009, Interim Construction Noise Guideline (ICNG);
- NSW Department of Environment and Conservation (DEC) 2006, Assessing Vibration: a technical guideline;
- German Standard DIN 4150-3 (2016-12) Part 3 Structural Vibration in Buildings. Effects on Structures; and
- Australian Standard AS 2436-2010 (R2016) Guide to Noise Control on Construction, Maintenance and Demolition Sites.

#### ii Surface water, sediment and erosion control

- Engineers Australia 2016, Australian Rainfall and Runoff;
- Environment Protection Authority 1997, Managing Urban Stormwater: Council Handbook;
- Landcom, 2004, Managing Urban Stormwater: Soils and Construction (Blue Book); and
- Penrith Council Water Sensitive Urban Design (WSUD) Guidelines.

#### iii Hazards and risk – Dangerous goods, bunding, spills and leaks

- Australian Dangerous Goods Code;
- DPHI's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33;
- EPA 197, Environment Protection Manual for Authorised Officers: Bunding and Spill management, technical bulletin;
- EPA 2007, Storing and Handling Liquids: Environmental Protection – Participants Manual; and
- other relevant Australian Standards.

#### iv Contamination and waste

- Safework NSW 2016, Safework NSW Code of Practice: How to Manage and Control Asbestos in the Workplace; and
- EPA 2017 Waste Classification Guidelines – Part 1: Classification of Waste.

Previous and ongoing consultation with the Council, DPHI, EPA, OEH, Department of Primary Industries (DPI), Transport for New South Wales (TfNSW) and other government agencies as required, will also continue to inform management and control measures during the construction phase of the project.



### 3.1.3 Development consent conditions

The requirements for the CEMP are stated under Condition C3 (Part C) of development consent SSD 7733, as consolidated. Conditions requiring inclusion in the CEMP are listed in Table 3.1.

**Table 3.1 Development consent SSD 7733 conditions relevant to CEMP**

Condition number	Condition description	Relevant section of report or other document
<b>Part A</b>	<b>Obligation to minimise harm to the environment</b>	
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Chapter 5 Chapter 6
<b>Part A</b>	<b>Terms of the consent</b>	
A2	The Development may only be carried out in: <ul style="list-style-type: none"> <li>a) compliance with the conditions of this consent</li> <li>b) accordance with all written directions of the Planning Secretary</li> <li>c) accordance with the EIS, Response to Submissions and additional information</li> <li>d) in accordance with the Modification Assessments</li> <li>e) accordance with development layout in Appendix 1; and</li> <li>f) accordance with the Management and Mitigation Measures in Appendix 2.</li> </ul>	Section 3.1.1 Section 3.1.3 Section 1.3 Section 1.4 Section 1.4  Chapter 5 Chapter 6
<b>Part A</b>	<b>Protection of public infrastructure</b>	
A19	Prior to the commencement of construction, the Applicant must: <ul style="list-style-type: none"> <li>a) consult with the relevant owner and/or provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure</li> <li>b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths)</li> <li>c) submit a copy of this report to the Planning Secretary and where it affects Council infrastructure, Council.</li> </ul>	Section 4.3.2 Section 4.4.2 Section 4.4.2
<b>Part A</b>	<b>Compliance</b>	
A23	The Applicant must ensure that employees, contractors and sub-contractors are aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Section 4.2
<b>Part A</b>	<b>Operation of plant and equipment</b>	
A24	The Applicant must ensure that all plant and equipment used for the development is: <ul style="list-style-type: none"> <li>a) maintained in a proper and efficient condition; and</li> <li>b) operated in a proper and efficient condition.</li> </ul>	Section 5.3.1 Section 5.3.3 Section 5.4.1
<b>Part B</b>	<b>Waste management</b>	
B1	All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste.	Section 5.8.1

Condition number	Condition description	Relevant section of report or other document
B3	The Applicant must ensure any waste generated on the site during construction is classified in accordance with the EPA's Waste Classification Guidelines, 2014 or its latest version and, disposed of to a facility that may lawfully accept the waste.	Noted
<b>Part B</b>	<b>Construction traffic management</b>	
B12	<p>Prior to the commencement of construction, the Applicant must prepare a Construction Traffic Management Plan (CTMP) for the development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by condition C2 and must:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s)</li> <li>b) detail the measures that are to be implemented to ensure road safety and network efficiency</li> <li>c) detail heavy vehicle routes, access and parking arrangements</li> <li>d) include a Driver Code of Conduct to: <ul style="list-style-type: none"> <li>(i) minimise the impacts on the local and regional road network</li> <li>(ii) minimise conflicts with other road users</li> <li>(iii) minimise road traffic noise</li> <li>(iv) ensure truck drivers use specified haul routes</li> <li>(v) include a program to monitor the effectiveness of these measures</li> </ul> </li> <li>e) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.</li> </ul>	Appendix A
B13	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>a) not commence construction until the CTMP required by Condition B12 is approved by the Secretary; and</li> <li>b) the Applicant must ensure the CTMP (as required and approved by the Secretary from time to time) is implemented for the operational life of the Development.</li> </ul>	-
<b>Part B</b>	<b>Soils, water quality and hydrology</b>	
B16	<p><b>Erosion and sediment control</b></p> <p>Prior to the commencement of construction, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the <i>Managing Urban Stormwater and Construction Guideline</i> and the Erosion and Sediment Control Plan (Appendix C) included in the CEMP required by Condition C2.</p>	Section 5.2.3 Appendix C
B18	<p><b>Stormwater management</b></p> <p>Prior to the commencement of construction of the development, the Applicant must finalise the detailed design of the stormwater management system. The system must:</p> <ul style="list-style-type: none"> <li>a) be designed by a suitably qualified and experienced person(s);</li> <li>b) be designed in accordance with the management and mitigation measures identified in condition A2;</li> <li>c) be generally in accordance with the conceptual design in the EIS;</li> <li>d) be in accordance with applicable Australian Standards; and</li> <li>e) ensure that the system capacity has been designed in accordance with <i>Australian Rainfall and Runoff</i> (Engineers Australia, 2016) and <i>Managing Urban Stormwater: Council Handbook</i> (EPA, 1997) guidelines.</li> </ul>	Section 5.2.1
<b>Part B</b>	<b>Air Quality</b>	
B19	The applicant must take all reasonable steps to minimise dust generated during all works authorized by this consent	Section 5.3 Chapter 6

Condition number	Condition description	Relevant section of report or other document
B20	<p>During construction, the Applicant must ensure that:</p> <ul style="list-style-type: none"> <li>a) exposed surfaces and stockpiles are suppressed by regular watering</li> <li>b) all trucks entering or leaving the site with loads have their loads covered</li> <li>c) trucks associated with the development do not track dirt onto the public road network</li> <li>d) public roads used by these trucks are kept clean</li> <li>e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</li> </ul>	Section 5.3.3
Part B	<b>Noise</b>	
B25	<p><b>Hours of construction</b></p> <p>Earthworks and construction- hours of work:</p> <ul style="list-style-type: none"> <li>• Monday - Friday 7 am to 6 pm Saturday 8 am to 1 pm</li> </ul>	Section 5.1
B27	<p><b>Construction Noise Limits</b></p> <p>The development must be constructed to achieve the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (DECC 2009) (as may be updated or replaced from time to time). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in the Appendix 2.</p>	Section 5.1
Part B	<b>Aboriginal heritage</b>	
B29	<p>If any item or object of Aboriginal heritage significance is identified on site:</p> <ul style="list-style-type: none"> <li>a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately;</li> <li>b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and</li> <li>c) the EES must be contacted immediately.</li> </ul>	Section 5.5
Part B	<b>Hazards and risk</b>	
B32	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Section 5.10.1
B33	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with:</p> <ul style="list-style-type: none"> <li>a) all relevant Australian Standards; and</li> <li>b) the Environment Protection Manual for Authorised Officers: Bunding and Spill management, technical bulletin (EPA 1997).</li> </ul>	Section 5.10
B34	In the event of an inconsistency between the requirements B33(a) to B33(b), the most stringent requirement must prevail to the extent of the inconsistency.	Section 5.10
B35	Bunding: The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or the EPA's <i>Storing and Handling Liquids: Environmental Protection – Participants Handbook</i> (Department of Environment and Climate Change, 2007).	Section 5.10

Condition number	Condition description	Relevant section of report or other document
B36	Prior to the commencement of construction (excluding site preparation works), the fire and life safety design of the development, including firewater containment, must be finalised in consultation with FRNSW to the satisfaction of the Planning Secretary and include suitable provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) Series.	Section 4.4.2 Section 5.11 Section 5.2.3
B36A	At least one month prior to the commencement of construction, or within such further period as the Planning Secretary may agree, the Applicant must prepare a Fire Safety Study (FSS) for the development, to the satisfaction of FRNSW and submit to the Planning Secretary. The FSS must: <ul style="list-style-type: none"> <li>a) be developed in accordance with the requirements of the <i>Hazardous Industry Planning Advisory Paper No.2</i> (HIPAP No.2);</li> <li>b) include an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ); and</li> <li>c) be consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets</li> </ul>	Section 4.2.2
36B	Prior to the commencement of occupation or commissioning of the development, the Applicant must submit an Emergency Plan and detailed emergency procedures for the development to the Planning Secretary. The Emergency Plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'.	Section 4.2.2
36C	Prior to the commencement of occupation or commissioning of the development, an Emergency Services Information Package, developed in accordance with the FRNSW Fire Safety Guideline – Emergency Services Information Package and Tactical Fire Plans, must be stored in an emergency information cabinet directly adjacent to the main entry point to the site.	Section 4.2.2
Part B	<b>Contamination</b>	
B37	Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition C2 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site. The Applicant must obtain any relevant approvals prior to disposal of any contaminated material off-site.	Section 4.4.2 Section 5.9.1
B37A	The Applicant must construct and manage the underground diesel tank in accordance with the requirements of the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019 (the Regulation).	Section 5.9.1
Part C	<b>Environmental management, reporting and auditing</b>	

Condition number	Condition description	Relevant section of report or other document
C1	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> <li>a) detailed baseline data;</li> <li>b) details of: <ul style="list-style-type: none"> <li>i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>ii) any relevant limits or performance measures and criteria; and</li> <li>iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> </li> <li>c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>i) impacts and environmental performance of the development;</li> <li>ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</li> </ul> </li> <li>e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</li> <li>f) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</li> <li>ii) complaint;</li> <li>iii) failure to comply with statutory requirements; and</li> </ul> </li> <li>h) a protocol for periodic review of the plan.</li> </ul>	This CEMP
C2	The Applicant must prepare a Construction Environmental Management Plan (CEMP) in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary	Section 1.3
C3	<p>As part of the CEMP required under condition C2 of this consent, the Applicant must include the following:</p> <ul style="list-style-type: none"> <li>a) Construction Traffic Management Plan (see condition B12)</li> <li>b) Erosion and Sediment Control Plan (see condition B16)</li> <li>c) Unexpected Contamination Procedure (see condition B37).</li> </ul>	Appendix A Appendix B Section 5.9.1
C4	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and</li> <li>b) carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.</li> </ul>	Section 1.3  Chapter 5

Condition number	Condition description	Relevant section of report or other document
C8	<p>Within three months of:</p> <ul style="list-style-type: none"> <li>a) the submission of an incident report under condition C11</li> <li>b) the submission of an Independent Environmental Audit under condition C16</li> <li>c) the approval of any modification of the conditions of this consent; or</li> <li>d) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review.</li> </ul>	Section 4.4.1
C9	The strategies, plans and programs required under this consent must be reviewed, and the Department must be notified in writing that a review is being carried out.	Section 4.4.1
C10	If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.	Section 4.4.1
C11	The Planning Secretary must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.	Section 7.2
C19	<p>At least 48 hours before the commencement of construction and for the life of the development, the Applicant must:</p> <ul style="list-style-type: none"> <li>a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> <li>i) the documents referred to in condition A2 of this consent and the final layout plans for the development</li> <li>ii) all current statutory approvals for the development</li> <li>iii) all approved strategies, plans and programs required under the conditions of this consent</li> <li>iv) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent</li> <li>v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs</li> <li>vi) a summary of the current stage and progress of the development</li> <li>vii) contact details to enquire about the development or to make a complaint;</li> <li>viii) a complaint register, updated monthly</li> <li>ix) the Compliance Reporting of the development</li> <li>x) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report</li> <li>xi) any other matter required by the Planning Secretary</li> </ul> </li> <li>b) keep such information up to date, to the satisfaction of the Planning Secretary.</li> </ul>	Section 4.3.3



**Table 3.2**      **Applicants management and mitigation measures**

Management and mitigation measure	
Air Quality	<p>The CEMP will include the following air quality management measures:</p> <ul style="list-style-type: none"> <li>• dust and air quality complaints will be recorded, identifying cause (stake appropriate measures to reduce emissions in a timely manner and record the measures taken)</li> <li>• any incidents that cause exceptional dust emissions and the actions taken to resolve the situation will be recorded</li> <li>• carry out regular site inspections, record inspection results and make an inspection log available to the local authority when asked</li> <li>• the site speed limit will be 20 km/h</li> <li>• idling vehicles will be shut down where practicable</li> <li>• plant engines will be tuned and maintained regularly</li> <li>• all loaded vehicles entering and leaving sites will be covered to prevent escape of materials during transport</li> <li>• mains water will primarily be used for effective dust suppression.</li> </ul>
Greenhouse gases	<ul style="list-style-type: none"> <li>• On-site equipment will be regularly maintained and serviced to maximise fuel efficiency</li> <li>• vehicle kilometres travelled on site will be minimised</li> <li>• energy efficiency will be progressively reviewed and implemented throughout the life of the facility.</li> </ul>
Noise	<p>The CEMP will include the following management measures to minimise noise impacts:</p> <ul style="list-style-type: none"> <li>• choosing quieter plant and equipment, including installing best-practice noise suppression equipment, based on the optimal power and size to most efficiently perform the required tasks</li> <li>• plant and equipment will be regularly maintained and serviced and operated in the quietest and most efficient manner</li> <li>• concurrent plant operation will be minimised as practical</li> <li>• vehicle and plant reversing will be minimised as practical</li> <li>• use of amplified devices for communication (e.g. public address systems or similar) will be minimised as practical</li> <li>• use of equipment that generates impulsive noise will be avoided, as practical</li> <li>• work will be scheduled to coincide with non-sensitive periods, as practical</li> <li>• neighbouring businesses will be informed of construction dates</li> <li>• provided contact details for the site manager for questions or complaints</li> <li>• noise mitigation measures will be regularly enforced (e.g. toolbox talks).</li> </ul>
Visual	CEMP will require the site's frontage be kept tidy and litter free.
Water	<p>The CEMP will include the following management measures to mitigate water related impacts:</p> <ul style="list-style-type: none"> <li>• existing drainage systems will be cleaned before commencement of construction; and</li> <li>• an erosion and sediment control plan will be prepared to manage runoff from the site outlining the use of geotextile cloth, gravel filled bags and silt fences to prevent sediment and debris from entering the existing drainage system or otherwise leaving the site.</li> </ul> <p>The following infrastructure will be constructed prior to the commencement of operation, as outlined in Appendix C:</p> <ul style="list-style-type: none"> <li>• grated permitter drainage lines will be installed at the entrance and exit driveways</li> <li>• runoff sediment traps will be cleaned and installed</li> <li>• drainage infrastructure will be relocated and/or upgraded to accommodate a 10-year ARI event</li> <li>• a 90,000 L rainwater tank will be installed as approved under Mod 2 of SSD7733</li> <li>• water efficient fixtures will be installed in the amenity area.</li> </ul>

#### Management and mitigation measure

Contamination	<p>The CEMP will include the following management measures to mitigate potential contamination impacts:</p> <ul style="list-style-type: none"><li>• The compromised slab (site 1) and areas where the slab is significantly cracked will be cut and removed, with the soil immediately below the removed slab excavated and tested for petroleum hydrocarbons. If relevant limits are exceeded, the material will be disposed of at a licensed facility.</li><li>• The oil sumps will be emptied, with contents disposed of at an appropriately licensed facility. The sumps will be inspected for damage. If any damage could allow for leakage, the sumps will be removed, with the soil immediately surrounding the sump tested for petroleum. If removal is required, and soil sampling outcomes exceed relevant limits, the material will be disposed of at a licensed facility. Otherwise, the sumps will be backfilled with concrete.</li><li>• Removed sections of the slab will be backfilled with VENM and resealed.</li><li>• During the initial construction stage, section of the slab will be progressively banded, treated with a solvent/degreaser and steam cleaned. The entire slab will be cleaned in this way. Wastewater will be pumped out and disposed at an appropriately managed facility.</li><li>• A construction environmental management plan will be prepared for the development phase of the site; this will include an unexpected finds protocol to ensure that if any contamination is encountered during construction it can be appropriately managed. This plan will inform contractors of the potential for subsurface soil contamination and will be required to look out staining and odours when excavating. Contractors will also use a photoionization detector during excavations so volatile organic compounds (petroleum hydrocarbons) can be assessed.</li><li>• An Unexpected Contamination Procedure is included at Section 5.9.1</li><li>• Installation of the 15,000L underground diesel tank will be in accordance with the requirements of the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019 (the Regulation).</li></ul>
Traffic and vehicle movement	<p>A Construction Traffic Management Plan has been prepared and is attached in Appendix A. It includes a driver code of conduct for minimizing road traffic noise. Prior to the commencement of operations, car parking will be provided as per the plans at Appendix A.</p>

## 4 Implementation and operation

### 4.1 Environmental roles and responsibilities

The facility has established roles and responsibilities for personnel to implement the requirements of this CEMP.

#### 4.1.1 Project manager

During the construction phase of the project, the project manager is responsible for:

- ensuring that adequate resources are provided to implement the requirements of this CEMP and to meet all legislative and contract requirements for environmental management
- directing and supporting the project team operations consistent with the requirements in this CEMP
- conducting fortnightly reviews with key project personnel to ensure the project environmental systems and procedures are adequately implemented
- ensuring that all contractor agreements issued to contractors and suppliers comply with the requirements of this CEMP.

#### 4.1.2 Site manager

During the construction phase of the project, the site manager is responsible for:

- ensuring that this CEMP is implemented
- reporting any deficiencies and shortcomings of the CEMP, regularly reviewing and improving the outlined practices
- checking mitigation measures and monitoring programs on a weekly basis to make sure they are compliant and effective
- reviewing Safe Work Method Statements (SWMS) or equivalent to ensure that environmental planning has been addressed and documented to an appropriate level
- adequately reporting on any on-site incidents that may occur during the construction phase through various internal and external channels
- managing and organising contractors involved in the construction of the project, maintenance and repair work.

#### 4.1.3 Environmental representative

During the construction phase of the project, the environmental representative is responsible for:

- acting as the main point of contact for advice in relation to the on-site environmental performance during construction activities
- considering and advising the project manager and site manager about conditions of approval, other licences and approvals related to the environmental performance and impacts of the project

- monitoring the implementation of this CEMP and other relevant environmental management plans and monitoring programs required under development consent SSD 7733
- reporting any deficiencies and shortcomings of the CEMP, regularly reviewing and improving the outlined practices
- regularly checking mitigation measures and ensures that regular environmental auditing is undertaken in accordance with Section 6.3 this CEMP
- ensuring the records of planned environmental control measures are kept on site as required
- adequately reporting on any on-site incidents that may occur during the construction phase through various internal and external channels
- being available to respond to any community concerns or complaints related to environmental performance during the construction phase of the project
- being involved in reviewing this CEMP and other management plans prior to submission to the Secretary.

#### 4.1.4 OHS advisor

During the construction phase, the occupational health and safety advisor is responsible for:

- taking part in the incident response and investigation processes, which are related to occupational health and safety
- recommending actions on incident data and trends, as required
- contacting Emergency Services (ambulance, fire brigade or police), when required
- preserving the incident scene
- coordinating help where needed at the incident response.

#### 4.1.5 All employees and contractors on-site

During the construction phase of the project, all employees and contractors' responsibilities include:

- complying with CEMP and environmental legislation, rules and guidelines
- following instructions from supervisor, foreman or leading hand as appropriate
- working with regard to the environment, not cause damage or adverse environmental impacts
- reporting environmental incidents immediately to site manager.

#### 4.1.6 Engineering manager

The engineering manager's responsibilities prior to and during the construction phase will involve:

- ensuring that the detailed design of the project is consistent with the approved and desirable environmental outcomes

- liaising with the environmental representative as required to ensure that environmental aspects and constraints of the project have been appropriately considered in the design.

#### 4.1.7 Environmental specialists

Consultants will be commissioned by Benedict Recycling, as required, to provide technical input and advice on environmental matters. Consultants will also undertake surveys, inspections, implement monitoring programs or prepare environmental assessments and reports, as required.

### 4.2 Training and awareness

#### 4.2.1 Site inductions

All employees and contractors must undertake a compulsory site induction that includes an environmental component prior to commencement of any work on-site. The induction is compulsory to ensure all personnel involved in the construction of the project have an awareness of the requirements of the CEMP and know how to implement adequate environmental management measures.

Short-term visitors to the site for purposes such as deliveries will not be inducted but will be accompanied by inducted personnel at all times.

The induction will cover:

- familiarisation with the CEMP
- key on-site environmental issues, such as dust and noise management
- relevant conditions of environmental licences, permits and approvals
- specific environmental management requirements and responsibilities of everyone that works on-site
- environmental controls and mitigation measures implemented on site to manage environmental issues
- incident response and reporting requirements
- information relating to the location of environmental constraints.

#### 4.2.2 Pre-start meetings/Toolbox talks

Benedict Recycling site manager will implement a program of toolbox talks or pre-start meetings for all personnel for the duration of the construction works. Toolbox talks are an important part of raising awareness and educating personnel on issues related to all aspects of construction including safety, quality and environmental issues.

These will be scheduled on a regular basis, and no less than once a fortnight for all on-site personnel. The toolbox talks will encourage information sharing and participation of all on-site personnel, making sure that environmental awareness and continuous improvement continues throughout the construction phase of the project.

Topics to be covered will be determined by Benedict Recycling and will include, but are not limited to:

- limits of work
- water pollution controls

- erosion and sediment control
- emergency and spill response
- noise management
- dust control
- storage and handling of chemicals
- onsite traffic management
- changes to previously communicated environmental mitigation measures
- environmental procedures and alerts
- fire safety study.

In accordance with Condition B36C an Emergency Services Information Package, must be stored in an emergency information cabinet directly adjacent to the main entry point to the site.

#### 4.2.3 Driver Code of Conduct

As per condition B14 (Part B) of development consent SSD 7733, drivers associated with the project will abide by the Drivers Code of Conduct and induction training to minimise road traffic noise and other impacts that could arise as a result.

Benedict Recycling Drivers Code of Conduct is included in the Construction Traffic Management Plan provided in Appendix A.

### 4.3 Communication

#### 4.3.1 Internal communication

Clear and effective communication throughout all internal levels and functions, including management and staff, is crucial to minimising environmental impacts and achieving continual improvements in environmental performance. Refer to Table 4.1 for key Benedict Recycling personnel and their contact details.

#### 4.3.2 Communication with relevant agencies and authorities

Benedict Recycling have been liaising with relevant government agencies and service providers from the pre-approval stage of the project. Key government stakeholders include the DPHI, EPA, OEH, DPI, DPI- Water, TfNSW and Council.

Ongoing communication is planned with government agencies and service providers, should any of the following circumstances arise:

- relevant archaeological experts and subsequently the Heritage Division of OEH will be contacted should an unexpected heritage item(s) be discovered during the construction phase of the project
- EPA and local Council will be contacted in the case of a pollution incident or unexpected contaminated material(s) find within 24 hours, as set out in the Unexpected Contamination Procedure at Section 5.9.1



- within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, a report will be supplied to DPHI outlining basic facts. This will be followed by a detailed report submitted to DPHI within 14 days after the incident or potential incident
- other government agencies will be contacted should issues arise relating to their area of management/jurisdiction.

Additionally, Benedict Recycling will consult with relevant owner and/or provider of services that are likely to be affected by the project to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure.

Key government agency and service provider contacts are listed in Table 4.1.

### 4.3.3 Stakeholder and community communication

Community consultation has been undertaken during the pre-approval stage of the project, including during the preparation of the EIS, the public exhibition of the EIS and RTS stages.

A complaint management system to engage in active community consultation and maintain positive relations with local residents will be implemented for the duration of the development. This is outlined in Section 7.1 of this document. The purpose of this system is to minimise complaints by addressing their concerns upfront and monitor the environmental performance of the site.

At least 48 hours prior to the commencement of construction, Benedict Industries will make the documentation set out in C19, including the following documentation, available on its website:

- EIS, RTS and approved development layout plans
- all current modification assessments
- all current statutory approvals for the development
- all approved strategies, plans and programs required under the development consent
- a complaints register updated on a quarterly basis.

### 4.3.4 Key contacts

Table 4.1 provides a list of key internal and stakeholder contacts.

**Table 4.1 Key internal and stakeholder contacts**

Contact name	Location/ contact	Contact number
<b>Benedict Recycling</b>		
Project manager	Ewen Mckenzie	0409 666 183
Site supervisor	Emmanuel Roussakis	0414 266 772
Environmental representative	Alycia Campbell	0437 468 258
HSE advisor	Peter Murdocca	0448 268 395
<b>Stakeholders</b>		
AGL/other electricity provider for the site	TBC	TBC

Contact name	Location/ contact	Contact number
Penrith Council		02 4732 7777
EPA's Environment Line		131 555
Fire & Rescue NSW Penrith Fire Station		02 4784 8386 02 9493 1086
Penrith Police Station		02 4721 9444
Wildlife Information Rescue Education Service (WIRES)		1300 094 737

## 4.4 Documentation

Benedict Industries environmental representative is responsible for maintaining all environmental documentation so that current versions are available at the point of use. Documents to be kept up to date include:

- the CEMP
- monitoring, inspection and audit/compliance reports and records
- correspondence with public authorities
- correspondence with surrounding landowners and occupiers, and any other community members
- induction and training records
- documentation relevant to environmental incidents and non-conformances, complaints and corrective action
- minutes of CEMP review meetings and evidence of actions taken.

All environmental management documents will be subject to ongoing review and continual improvement. Only the environmental representative has the authority to change any of the environmental management documentation.

Copies of documents to be kept on site at all times include:

- development consent SSD 7733
- relevant construction and operation environmental management plans including:
  - this CEMP
  - CTMP
- SWMS
- first aid instructions
- OHS relevant documentation
- other approvals, permits and licences to undertake construction activities on-site.

#### 4.4.1 CEMP review

Condition C9 of the development consent requires that the CEMP be reviewed and revised if necessary within three months of an approval of a modification or submission of an incident report to DPHI or a direction of the Planning Secretary. This will be the responsibility of the environmental representative.

#### 4.4.2 Notification, consultation and approval of supporting documentation

A summary of review, consultation and approval requirements for supporting documentation is provided in Table 4.2.

**Table 4.2 Summary of additional notification, consultation and approval requirements**

Document	Requirement	Timing
Dilapidation report	Prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths) and submit a copy of the report to the DPHI and Council.	The dilapidation report will be provided to DPHI and Council for notification purposes.  The dilapidation report and evidence of notification will be provided to the certifying authority prior to the commencement of construction.
Fire and Life Safety Design Report	Prior to the commencement of construction (excluding site preparation works), the fire and life safety design of the development, including firewater containment, must be finalised in consultation with FRNSW to the satisfaction of the Planning Secretary and include suitable provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) Series.	The Fire and Life Safety Design will be prepared, discussed with FRNSW and submitted to the Secretary of Planning prior to construction.
Fire Safety Study	At least one month prior to the commencement of construction, or within such further period as the Planning Secretary may agree, the Applicant must prepare a Fire Safety Study (FSS) for the development, to the satisfaction of FRNSW and submit to the Planning Secretary. The FSS must: (a) be developed in accordance with the requirements of the Hazardous Industry Planning Advisory Paper No.2 (HIPAP No.2); (b) include an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ); and (c) be consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets	The FSS The Emergency Plan will be prepared and submitted to the Secretary of Planning prior to construction.
Emergency Plan	Prior to the commencement of occupation or commissioning of the development, the Applicant must submit an Emergency Plan and detailed emergency procedures for the development to the Planning Secretary. The Emergency Plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'.	The Emergency Plan will be prepared and submitted to the Secretary of Planning prior to occupation.

Document	Requirement	Timing
Emergency Services Information Package	Prior to the commencement of occupation or commissioning of the development, an Emergency Services Information Package, developed in accordance with the FRNSW Fire Safety Guideline – Emergency Services Information Package and Tactical Fire Plans, must be stored in an emergency information cabinet directly adjacent to the main entry point to the site.	The Emergency Services Information Package will be prepared, discussed with FRNSW and submitted to the Secretary of Planning prior to occupation.

## 5 Management of key environmental aspects and risks

The management procedures in the following sections apply to the construction phase and indicate the measures that will be implemented to manage environmental aspects and risks identified in the EIS, RTS, modification assessments and development consent SSD 7733.

### 5.1 Noise management and control measures

It is likely that noise levels will be above the relevant noise management levels (NMLs) at times during the construction activities. It is also possible that vibration levels generated by construction activities will be above the relevant human comfort and structural vibration criteria. Site specific noise and vibration mitigation and management measures will therefore be implemented at the facility, as well as general good practice recommendation. These are provided in Table 5.1.

**Table 5.1 Noise and vibration management and control measures**

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<b>Management measures</b>		
<ul style="list-style-type: none"> <li>Non-conformance with CEMP objectives, development consent SSD 7733, modification assessments, EIS and RTS.</li> <li>Noise and vibration nuisance to local residences and businesses.</li> </ul>	Noise modelling shows that the existing fencing prior to starting construction would result in a reduction of construction noise levels to below the noise management levels (NMLs) at most residential receivers.	Engineering Manager, Project Manager
	Limit vibrations for structural damage and human response in accordance with the German Standard DIN 4150-3 (2016-12) <i>Part 3 Structural Vibration in Building- Effects on Structures</i> and the NSW DEC <i>Assessing Vibration: a technical guideline</i> (2006).	Site Manager
	Minimise the number of plant items operating concurrently when in close proximity to receivers.	All employees
	Minimise the need for vehicle reversing, for example, by arranging for one-way site traffic routes.	Site Manager, all employees
	Monitoring will be used incorporating warning lights during high vibration producing works.	Site Manager
	Enforcing the approved hours of work	Site Manager

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<b>Universal Work Practices</b>		
<ul style="list-style-type: none"> <li>Non-conformance with CEMP objectives, development consent SSD 7733, modification assessments, EIS and RTS.</li> <li>Noise and vibration nuisance to local residences and businesses.</li> </ul>	Regular reinforcement (such as toolbox talks) of the need to minimise noise and vibration).	Site Manager, all employees
	Regular identification of noisy activities and adoption of improvement techniques.	Site Manager
	Avoiding the use of portable radios, public address systems or other methods of site communication that may unnecessarily impact upon nearby residents.	Site Manager, all employees
	Developing routes for the delivery of materials and parking of vehicles to minimise noise.	
	Avoiding the use of equipment that generates impulsive noise, where possible.	Site Manager, all employees
	Minimising the movement of materials and plant and unnecessary metal-on-metal contact.	Site Manager
	Minimising truck movements.	
	Scheduling respite periods of intensive works as determined through consultation with potentially affected neighbours (eg a daily respite period for a minimum of one hour at midday).	Site Manager, all employees
		Site Manager Environmental Manager, Site Manager
<b>Plant and equipment</b>		
<ul style="list-style-type: none"> <li>Non-conformance with CEMP objectives, development consent SSD 7733, modification assessments, EIS and RTS.</li> <li>Noise and vibration nuisance to local residences and businesses</li> </ul>	Selecting quieter plan and equipment based on the optimal power and size to most efficiently perform the required tasks.	Project Manager
	Using temporary noise barriers (in the form of plywood hoarding or similar) to shield intensive construction noise activities.	Site Manager, Engineering Manager
	Operating plant and equipment in the quietest and most efficient manner.	Site Manager
	Regularly inspecting and maintaining plant and equipment to minimise noise and vibration level increases, to ensure that all noise and vibration reduction devices are operating effectively.	All Employees, Site Manager



Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<b>Work Scheduling</b>		
<ul style="list-style-type: none"> <li>Non-conformance with CEMP objectives, development consent SSD 7733, modification assessments, EIS and RTS.</li> <li>Noise and vibration nuisance to local residences and businesses.</li> </ul>	Scheduling activities to minimise impacts by undertaking all possible work during hours that will least adversely affect sensitive receivers and by avoiding conflicts with other scheduled events.	Site Manager
	Scheduling work to coincide with non-sensitive periods.	Project Manager, Site Manager
	Scheduling noisy activities to coincide with high levels of neighbourhood noise so that noise from the activities is partially masked and not as intrusive.	Site Manager
	Planning deliveries and access to the site to occur quietly and efficiently and organising parking only within designated areas located away from the sensitive receivers.	Project Manager
	Optimising the number of deliveries to the site by amalgamating loads where possible and scheduling arrivals within designated hours.	Project Manager
	Designating, designing and maintaining access routes to the site to minimise impacts.	Project Manager, Site Manager
	Use contract conditions that include penalties for non-compliance with reasonable instructions by the principal to minimise noise or arrange suitable scheduling.	Project Manager, HR
	High vibration/impulsive generating activities should only be carried out in continuous blocks, with appropriate respite periods as determined through consultation with potentially affected neighbours.	Site Manager
	Neighbouring businesses will be informed of construction dates	Site Manager
<b>Community consultation</b>		
<ul style="list-style-type: none"> <li>Non-conformance with CEMP objectives, development consent SSD 7733, modification assessments, EIS and RTS</li> </ul>	As outlined in Section 4.3.3, community consultation has been undertaken during various stages of the project.	Project Manager
	Community consultation and engagement will continue throughout the construction phase and the life of the project.	Environmental Representative
	An emergency after hours contact phone number will be put in place to allow contact with the project manager in relation to any environmental matter. This phone number will be clearly displayed on the site fencing.	

## 5.2 Water

### 5.2.1 Surface water

The consent has been modified and now requires that the detailed design of stormwater management system should be finalised prior to commencement of construction. The stormwater management system for the site has been designed to comply with relevant guidelines listed in Consent Condition B18.

The site surface is currently fully sealed other than for the landscaped area along the street frontage. The proposal is to construct a shed over the entire operating area (not parking or weighbridges). The small open areas would have runoff drainage overland to the existing stormwater system. A piped drainage system will be implemented and designed to Council's Standards.

Additional erosion and sediment control measures will be implemented to minimise the extent of sediment in runoff during construction from the site. The erosion and sediment control plan is included in Appendix B, and some mitigation measures are included in Table 5.2 below.

## 5.2.2 Groundwater

Project related ground excavations, including footings and an onsite sedimentation basin/ are expected to be less than 3.5 m deep. Most of the excavations are expected to be shallower than the depth to groundwater and therefore impacts to groundwater in the uppermost competent rock are not expected anywhere on-site.

Eventually, the site will be sealed, and this will prevent any potential contamination from entering the groundwater. Prior to sealing the site, best practice management and mitigation measures will be employed to prevent contamination of groundwater resources, as outlined in Section 5.2.3.

The site is currently sealed, and the existing stormwater system will be augmented by bidum cloth barriers to prevent sediment from entering the stormwater system during construction.

## 5.2.3 Management and control measures

Site specific surface water and groundwater, including erosion and sediment control, mitigation and management measures will be implemented at the facility during the construction phase. These are provided in Table 5.2.

**Table 5.2 Water management and control measures**

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<b>Surface water and groundwater, including sediment and erosion control</b>		
<ul style="list-style-type: none"> <li>Non-conformance with CEMP objectives, development consent SSD 7733, modification assessments, EIS and RTS.</li> <li>Pollution of groundwater resources.</li> <li>Public and environmental health hazard.</li> </ul>	<p>Prior to the commencement of construction, Benedict Recycling will install and maintain suitable erosion and sediment control measures on-site, in accordance with relevant requirements in the latest version of the Blue Book and the erosion and sediment control plan contained within the WMP.</p> <p>Construction will not commence until CEMP required by Condition C4 is approved by the Secretary.</p> <p>As soon as the shed is built, it will be used to house the majority of site activities, preventing generation of runoff from these activities.</p> <p>Location of shed outside of major overland flow paths.</p> <p>Connection to the sewage system for onsite personnel amenities.</p> <p>Existing drainage systems will be cleaned before commencement of construction; and</p> <p>An erosion and sediment control plan will be prepared to manage runoff from the site outlining the use of geotextile cloth, gravel filled bags and silt fences to prevent sediment and debris from entering the existing drainage system or otherwise leaving the site.</p> <p>Grated permitter drainage lines will be installed at the entrance and exit driveways;</p> <p>Runoff sediment traps will be cleaned and installed;</p> <p>Drainage infrastructure will be relocated and/or upgraded to accommodate a 10-year ARI event;</p> <p>A 90,000 L rainwater tank will be installed to replace the 4,000L tank;</p> <p>Water efficient fixtures will be installed in the amenity area.</p> <p>No significant excavations over the site.</p> <p>Regular maintenance of source controls and removal of accumulated materials.</p>	<p>Project Manager, Environmental Manager/representative</p> <p>Project Manager, Environmental Manager/representative</p> <p>Site Manager, all employees</p> <p>Engineering Manager</p> <p>Project Manager, Environmental Manager/representative</p> <p>Project Manager, Environmental Manager/representative</p> <p>Project Manager, Environmental Manager/representative</p> <p>Project Manager, Environmental Manager/representative</p> <p>Project Manager, Environmental Manager/representative</p>

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
	Surface water captured within the runoff management system during the site construction phase will be used for dust suppression so that mains water is not required for this purpose.	Project Manager, Environmental Manager/representative
	Dust suppression as required.	Project Manager, Environmental Manager/representative
	Additional temporary sediment control as needed during installation of works at the front of the site (ie site security fencing and landscaped area).	Project Manager, Environmental Manager/representative
	Water will not be used for any other activities other than for dust suppression.	Project Manager, Environmental Manager/representative
	A spill kit shall be kept on site. All fuel, oil and other chemical spills should be attended to and reported immediately.	Project Manager, Environmental Manager/representative

## 5.3 Air quality

### 5.3.1 Fumes and dust

Potential sources of particulate matter emissions during the construction phase of the project include:

- vehicle entrainment of particulate matter due to the haulage of construction material within the facility boundaries
- unloading of construction material within the site
- diesel fuel combustion by on-site plant and equipment.

Activities that are likely to generate dust during the construction phase of the project include:

- vehicle and mobile equipment movement on unsealed surfaces prior to the site being sealed
- construction material handling
- any other topsoil disturbance including minor excavation works
- installing anchors and footings into the ground.

### 5.3.2 Odour

There are no foreseeable odour impacts anticipated as a result of the construction works. Whilst the site does not accept putrescible waste, regular site monitoring for possible sources of odour is conducted and control activities implemented as required, i.e. by arranging prompt and regular removal of residual waste. All incoming loads will be inspected and if odorous, they will be immediately rejected.

### 5.3.3 Management and control measures

Air quality management measures are presented in Table 5.3.

**Table 5.3 Air quality management and control measures**

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<ul style="list-style-type: none"> <li>Non-conformance with CEMP, objectives, development consent SSD 7733, modification assessments, EIS and RTS.</li> </ul>	Regular visual monitoring of the dust levels inside the facility.	Site Manager, Environmental Manager/representative, all employees
<ul style="list-style-type: none"> <li>Air and surface water pollution.</li> </ul>	Minimise idling vehicles onsite, where practicable.	All employees
<ul style="list-style-type: none"> <li>Dust and odour nuisance to local residents and businesses.</li> </ul>	Ensure proper maintenance and turning of all equipment engines.	All employees
<ul style="list-style-type: none"> <li>Public and environmental health hazard.</li> </ul>	Arranging of street sweeping of hardstand/roads when required.	Site Manager, all employees
	Trucks associated with the facility constructions works will not track dirt onto the public road network. As a result, public roads used by these trucks will be kept clean.	Truck drivers
	As soon as the shed is built, all construction materials will be stockpiled within the shed.	Site Manager, all employees
	Green waste and timber to be used as part of the construction process will be stockpiled in a covered bay.	
	As soon as sealed areas are created, they will be maintained.	Site Manager, all employees
	Truck tyres will be cleaned to prevent mud or sediment being carried to and deposited on the access roads (and public roads).	Site Manager
	Dust generating activities will be undertaken within the main shed.	All employees, vehicle drivers
	No composting will be undertaken on the site.	Site Manager
	All trucks entering or leaving the site with construction material loads will have their loads covered.	Environmental manager/representative
	Dust and air quality complaints will be recorded, identifying cause and stating appropriate measures to reduce emissions in a timely manner and record the measures take;	Site Manager, truck drivers
	Any incidents that cause exceptional dust emissions and the actions taken to resolve the situation will be recorded;	
	Carry out regular site inspections, record inspection results and make an inspection log available to the local authority when asked;	
	The site speed limit will be 20 km/h;	
	Idling vehicles will be shut down where practicable;	
	Plant engines will be tuned and maintained regularly;	
	All loaded vehicles entering and leaving sites will be covered to prevent escape of materials during transport; and	
	Mains water will primarily be used for effective dust suppression.	Site Manager, Environmental Manager/representative. all employees

## 5.4 Greenhouse gases

### 5.4.1 Management and control measures

Management measures that will be implemented during the construction phase to minimise greenhouse gas emissions are included in Table 5.6.

**Table 5.4** Greenhouse gas management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<ul style="list-style-type: none"><li>Non-conformance with CEMP objectives, development consent SSD 7733, modification assessments, EIS and RTS</li><li>Contribution to greenhouse gas emissions</li></ul>	On-site equipment will be regularly maintained and serviced to maximise fuel efficiency.	Environmental Manager/representative
	Vehicle kilometres travelled on site will be minimised	All vehicle drivers
	Energy efficiency will be progressively reviewed and implemented throughout the life of the facility	Environmental Manager/representative

## 5.5 Heritage

### 5.5.1 Unexpected heritage items

Condition B29 (Part B) of development consent SSD 7733 specifies that the CEMP must include an unexpected finds protocol for heritage items. There have been instances, even when thorough cultural heritage assessments are undertaken during the environmental assessment process, where unexpected heritage items (both Aboriginal and non-Aboriginal) are not appropriately identified and are subsequently found on a construction site.

The unexpected items can be broadly categorised into three groups: Aboriginal objects, historic (non- Aboriginal) heritage items, and human skeletal remains. Examples of potential Aboriginal and non- Aboriginal discoveries may include, but are not limited to:

- Aboriginal stone artefacts, shell middens, burial sites, engraved rock art, scarred trees
- artefacts such as broken and complete bottles, ceramics, glass, animal bones and clay pipes
- remains of infrastructure such as buildings, stations, bridges, rail lines, drainage services, curb and pavements and road surfaces
- human skeletal remains.

### 5.5.2 Unexpected finds protocol and management measures

As mentioned in Chapter 6, heritage items are unlikely to be found within the vicinity of the facility. Nevertheless, the following management measures should be employed on-site:

- Aboriginal objects and places remain protected under the NPW Act. Considering this, all workers should be made aware that it is illegal to harm an Aboriginal object, and if a potential Aboriginal object is encountered during activities associated with the project, all work will cease in the immediate vicinity of the item and a qualified heritage professional will be contacted for advice.
- If unexpected historical archaeology is discovered during construction, work in the immediate area must cease and an archaeologist must be contacted to make an assessment of the find. If it is determined to be a relic under the Heritage Act, further investigation may be required.

- In the event that known or suspected human skeletal remains are encountered during the activity, the following procedure will be followed:
  - All work in the immediate vicinity will cease and the find will be immediately reported to the work supervisor who will immediately advise the environmental representative or other nominated senior staff member.
  - The environmental representative or other nominated senior staff member will immediately notify the police and the state coroner (as required for all human remains discoveries).
  - The environmental representative or other nominated senior staff member will contact OEH for advice on identification of the skeletal material.
  - If it is determined that the skeletal material is Aboriginal ancestral remains, the Local Aboriginal Land Council will be contacted, and consultative arrangements will be made to discuss ongoing care of the remains.
  - If it is determined that the skeletal material is not Aboriginal ancestral remains, further investigation will be conducted to determine if the remains represent a historical grave or if further involvement of the police is required.
- If unexpected historical archaeology is discovered during construction, work in the immediate area must cease and an archaeologist must be contacted to make an assessment of the find. If it is determined to be a relic under the Heritage Act, further investigation may be required.

## 5.6 Traffic and transport

### 5.6.1 Management and control measures

Condition B18 (Part B) of development consent SSD 7733 specifies traffic and access conditions for the facility, which are, along with other management measures, included in Table 5.7.

A Construction Traffic Management Plan and Driver Code of Conduct is provided in Appendix A.

**Table 5.5 Traffic and transport management and control measures**

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
Non-conformance with CEMP objectives, development consent SSD 7733, EIS and RTS	All drivers employed by Benedict Recycling at the facility must abide by the Drivers Code of Conduct attached in Appendix A.	Site Manager, all drivers
	Vehicles dispatching materials for construction will be covered prior to leaving the site.	Site Manager, all drivers

As noted in Table 2.2, construction will include deployment of temporary traffic control devices (TCDs). TCDs are signs, traffic signals road markings, and or other devices designed to regulate, inform, warn or guide road users.

The TCDs for the site will include:

- signage:
  - Warning and directional signage for drivers and pedestrians at entry/exit of the construction site.
  - Maximum site speed limit of 10 km/h.

- entrance and exit lane line markings at the front of the site
- traffic cones or movable barriers within the site demarcating exclusion areas (dependent on daily activities).

## 5.7 Visual

### 5.7.1 Management and control measures

Management measures and site actions that will be implemented during construction to minimise visual impacts are listed in Table 5.6.

**Table 5.6 Visual management and control measures**

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<ul style="list-style-type: none"> <li>• Non-conformance with CEMP objectives, development consent SSD 7733, EIS and RTS</li> </ul>	<p>The facility will be constructed in accordance with the approved plans.</p> <p>Benedict Recycling will ensure that the external appearance of the facility is suitable and contributes to the visual character of the surrounding area (i.e. area is zoned IN1 industrial).</p> <p>The visual appearance of the site entrance on Peachtree Road will be kept tidy throughout the construction works</p> <p>Cladding the top 3 meters of the masonry wall along the street boundary in Colorbond for improved appearance and signage space</p>	<p>Project Manager, Environmental Manager/representative</p> <p>Site Manager, all employees</p>

## 5.8 Waste

Waste will be management and controlled during the construction phase via implementation of measures outlined in Table 5.7.

### 5.8.1 Management and control measures

**Table 5.7 Waste management and control measures**

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<ul style="list-style-type: none"> <li>• Non-conformance with CEMP objectives, development consent SSD 7733, EPL, EIS and RTS.</li> <li>• Improper disposal of waste causing public and environmental harm.</li> </ul>	<p>All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste.</p> <p>Benedict Recycling will ensure that any waste generated on-site during construction is classified in accordance with the EPA's Waste Classification Guidelines 2014 or its latest version and, disposed of to a facility that may lawfully accept the waste.</p> <p>Specific waste areas to be established, ie for food, drink and all other rubbish to be disposed offsite properly.</p> <p>No food, drink or other rubbish to be disposed on site.</p> <p>No chemical or fuel wastes to be disposed of on site.</p> <p>No burning of waste is to occur on site.</p>	<p>Environmental Manager/representative, Site Manager</p> <p>Environmental Manager/representative, Site Manager</p> <p>Site Manager</p> <p>Site Manager, all employees</p> <p>Site Manager, all employees</p> <p>Site Manager</p>

## 5.9 Contamination

Table 5.8 outlines specific CEMP requirements as contained in Appendix 2 of the SSD 7733 Development Consent.

Condition C1 (d) (Part C) of development consent SSD 7733 specifies that the CEMP should include an unexpected finds protocol for contaminated material. Given the condition of the site (concreted), contamination is unlikely. Nevertheless, should contaminated items be found, the steps outlined below should be followed.

The appropriate management of unexpected finds will minimise human health and environmental risks from the disturbance of potential contaminated materials and will ensure the material is managed in accordance with the CLM Act.

Unexpected finds at the site could relate to buried finds and/or volatile contaminants including (but not limited to):

- oil/diesel/tar/petrol sheens, free product, odours or impacted soils
- buried material, such as drums, disused pipe work, tyres or waste
- asbestos pieces, fibre cement sheets, fibres
- discoloured or odorous soil
- acid sulphate soils (ASS) or potential ASS, appearing as grey, gummy soils with rotten egg smell.

### 5.9.1 Unexpected contamination procedure

The following procedures will be implemented if suspected contamination is discovered during excavation:

1. Upon discovery of unexpected contamination, all construction works in the immediate vicinity are to cease, the site manager is to be notified and the area barricaded.
2. Relevant and necessary approvals will be obtained prior to the removal of any material or remediation works.
3. The potentially contaminated material is to be removed and disposed of in accordance with the Waste Classification Guidelines. This may include removal of a buffer zone around the potentially contaminated material, based on field observations or volatile detections with a photoionization detector. The notification and engagement of a qualified environmental consultant will be required to assess the nature and degree of potential contamination and classification.
4. Unless otherwise demonstrated, suspected potentially contaminated material will be treated as contaminated material and will be removed off-site to a waste facility licensed to accept contaminated material.
5. If the find is suspected to be asbestos material, the area is to be kept wet and management practices implemented in accordance with the Safework NSW Code of Practice, How to Manage and Control Asbestos in the Workplace, Code of Practice (Safework NSW 2016). If appropriate, the material will be covered to prevent dust generation, pending final management.
6. If the find is actually ASS or potential ASS, a suitably qualified consultant is to be engaged to manage the ASS in accordance with the National Guidance for the Management of Acid Sulfate Soils in Inland Aquatic Ecosystems (EPHC and NRMMC 2011).



7. Unexpected finds are to be documented throughout the unexpected finds process. This will include date(s), location(s), persons involved and remedial actions.
8. Once the area is remediated and validated construction works will recommence.
9. Any required remediation will be directed by the Site Manager with supervision from a qualified Environmental Consultant depending on the type and extent of contamination.

**Table 5.8 Contamination measures**

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
	The compromised slab (site 1) and areas where the slab is significantly cracked will be cut and removed, with the soil immediately below the removed slab excavated and tested for petroleum hydrocarbons. If relevant limits are exceeded, the material will be disposed of at a licensed facility.	Environmental Manager/representative, Site Manager
	The oil sumps will be emptied, with contents disposed of at an appropriately licensed facility. The sumps will be inspected for damage. If any damage could allow for leakage, the sumps will be removed, with the soil immediately surrounding the sump tested for petroleum. If removal is required, and soil sampling outcomes exceed relevant limits, the material will be disposed of at a licensed facility. Otherwise, the sumps will be backfilled with concrete.	Environmental Manager/representative, Site Manager
	Removed sections of the slab will be backfilled with VENM and resealed.	Environmental Manager/representative, Site Manager
	During the initial construction stage, section of the slab will be progressively banded, treated with a solvent/degreaser and steam cleaned. The entire slab will be cleaned in this way. Waste water will be pumped out and disposed at an appropriately managed facility.	Environmental Manager/representative, Site Manager
	Contractors will also use a photoionization detector during excavations so volatile organic compounds (petroleum hydrocarbons) can be assessed.	Environmental Manager/representative, Site Manager

## 5.10 Hazardous goods, spills and leaks

Hydrocarbons such as fuels, oils, lubricants and other chemicals may be used during the construction phase of the project.

A list of dangerous goods and other potentially hazardous materials to be stored on site, and their quantities, is listed in Table 5.1 of the EIS. Screen testing carried out against the thresholds in SEPP 33 has determined that:

- the hazardous materials are not potentially hazardous
- the number of weekly and annual deliveries and the approximate quantities per load to the site are below the SEPP 33 transporting threshold.

A requirement of condition B35 of development consent SSD 7733 is to store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with relevant Australian Standards and EPA's Storing and Handling Liquids: Environmental Protection – Participants Handbook.

A 15,000 litres underground diesel tank will be installed at the site. Condition 37A of development consent 7733 requires the underground diesel tank to be managed and operated in accordance with the requirements of the

Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019 (the Regulation).

A Fire Safety Study (FSS) has been developed in relation to the original Consent and is being considered by NSW Planning. This was in accordance with the requirements of the Hazardous Industry Planning Advisory Paper No.2 (HIPAP No.2), it also includes an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ); and is consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets. This will need to be modified to accommodate MOD 2 changes.

### 5.10.1 Management and control measures

Management measures outlined in Table 5.9 should be employed to avoid any environmental impacts.

**Table 5.9 Hazardous goods, spills and leaks management and control measures**

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<ul style="list-style-type: none"> <li>Non-conformance with CEMP objectives, development consent SSD 7733, EPL, EIS and RTS.</li> </ul>	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the DPHI's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Environmental Manager/representative, Site Manager
<ul style="list-style-type: none"> <li>Fuels and lubricants could potentially spill or leak and pollute the local environment.</li> </ul>	<p>The underground diesel tank must be constructed and operated in accordance with the requirements of the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019 (the Regulation).</p> <p>Management and control measures for hazardous goods, spills and leaks should be in accordance with relevant guidelines listed in Section 3.1.2.</p> <p>Hydrocarbons will be stored in containers and within bunded areas to contain spill and leakages.</p> <p>A spill kit will be kept in the construction area at all times.</p> <p>Vehicles and machinery will not be refilled or lubricated over unsealed surfaces.</p>	<p>Environmental Manager/representative, Site Manager</p> <p>Site Manager</p> <p>Site Manager</p>

## 5.11 Public safety

Construction works will predominantly be on privately owned land which is not readily accessible to the public. Construction works will be temporary.

### 5.11.1 Management and control measures

The following management measures in Table 5.10 will be implemented.

**Table 5.10 Public safety management and control measures**

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
<ul style="list-style-type: none"> <li>Public safety hazards</li> </ul>	<p>Safety signage will be placed around the construction site.</p> <p>Fencing will be constructed before any of the construction activities take place.</p>	<p>Site Manager</p> <p>Project Manager, Site Manager</p>

## 6 Environmental management systems

### 6.1 Safe Work Method Statements (or equivalent)

Safe Work Method Statements (SWMS) is a key construction site document that outlines the work activities to be undertaken at a workplace, the safety hazards and environmental risks that may arise from these activities, and the controls to put in place to manage and mitigate the hazards and risks.

In most instances, the SWMS will be prepared by the work crew carrying out work activities associated with the construction of the project. The SWMS will then be signed off by the site supervisor.

Where the work crew is not involved in developing the SWMS, they must have an opportunity to read, understand and sign the SWMS prior to commencing the work.

Every activity that is undertaken as part of the construction works must be carried out in accordance with a developed SWMS.

### 6.2 Monitoring and measurement

A requirement of condition C1 (f)&(g) (Part C) of development consent SSD 7733, as consolidated, is to detail how the environmental performances of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.

Environmental monitoring will involve observing, collecting and interpreting data to evaluate the effectiveness of the specified environmental management measures, and to facilitate CEMP review and improvement where necessary.

Monitoring will be carried out as frequently as required for each of the environmental aspects covered in Chapter 5.

### 6.3 Audits and inspections

#### 6.3.1 Audits

The implementation of the CEMP will be audited by the environmental representative in conjunction with the project manager to ensure effective compliance with safety hazards, environmental controls, reporting and incident management.

Audit reports raised will be provided to the project manager for determining corrective action and reply.

#### 6.3.2 Regular inspections

The environmental representative will undertake inspections of the work sites weekly and after rainfall events, to ensure that environmental controls outlined in this CEMP and the erosion and sediment control plan are implemented and to evaluate their effectiveness. Their observations will be recorded, and any work requiring rectification will be communicated to the site manager.

Rectification work will be arranged by the site manager and completed with accountability and within the given timeframe. Any rectification work that cannot be completed within the specified timeframe shall be recorded as a corrective action.

Issues arising from site environment inspections shall be discussed at regular toolbox meetings and any concerns raised will be considered by the environmental representative and project manager.

### 6.3.3 Pre work inspections

An inspection will be carried out by the work crew prior to the commencement of works on each shift, which will include a check of relevant environmental controls and resources required to ensure effective operation and maintenance. Works will not commence unless inspections are found to be satisfactory.

## 6.4 Non-conformance and corrective actions

Benedict Recycling will identify environmental non-conformances, including environmental incidents, during the construction phase of the project and will undertake the required corrective actions to address the non-conformance and implement preventative actions where required.

Environmental non-conformance will be identified through processes outlined in this CEMP such as monitoring, audits, regular inspections and complaints. Reporting on environmental non-conformance will be the responsibility of all Benedict Recycling employees and contractors. Tracking of environmental non-conformances and associated corrective actions will be the responsibility of the environmental representative.

### 6.4.1 Environmental Incident and Action Register

When an environmental non-conformance or environmental incident is identified, the details of these will be documented in an Environmental Incident and Action Register, with the following steps to be taken:

- The register will outline the nature of the non-conformance/incident, the corrective and preventative actions proposed and to be undertaken, the responsibilities and schedule for completion of these actions.
- Non-conformances associated with monitoring, audits, inspections and complaints will be linked to the records of these.
- Once an action has been completed, the status of the incident will be updated to close the action, with comments and completion date.
- The Environmental Incident and Action Register will be reviewed weekly by the environmental representative.

Benedict Recycling will maintain a register of accidents, incidents and potential incidents for the duration of the development. This register is to be made available for inspection at any time by DPHI, EPA or the Independent Hazard Auditor.

Further detail about the management of incidents and incident response planning is covered in Section 7.

## 7 Environmental incidents and emergencies

### 7.1 Public complaints

Any enquiries or complaints made by members of the public to site personnel should be directed to the project manager.

Benedict Recycling employees or contractors present on site during the construction of the project should not speculate or engage with the public regarding their complaints or enquiries.

To effectively manage any requests for information or respond to any public concerns in relation to the proposed construction activities and site operation, an emergency after hours contact phone number will be put in place to allow contact with the project manager in relation to any environmental matter. This phone number will be clearly displayed on the site fencing.

All information relating to such complaints will be kept in a register. The register will include but not be restricted to the following information:

- date and time of complaint
- complainant details (i.e. full name, address and contact details where these have been voluntarily provided)
- nature and source of complaint
- action taken
- follow-up with complainant.

The complaint register will be made available to any relevant regulatory authority upon request.

Should the complaint be relevant to any of the conditions of development consent SSD 7733 conditions, as consolidated, it shall be handled as per the conditions relevant to that environmental aspect.

### 7.2 Incident response

All environmental incidents, including complaints, near misses and non-compliances with the CEMP must be reported internally so that they can be investigated, corrected and prevented from recurring. These will be recorded into an Environmental Incident and Action Register, as per specifications outlined in Section 6.4.1.

Persons that have been involved or have witnessed an incident will report it immediately to the site manager or environmental representative. Once the incident has been reported internally via the correct channels, all efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place.

Incident investigations will be closed as quickly as possible, taking all required action to resolve each environmental incident and re-occurrence.

Within 24 hours of an incident or potential incident with actual or potential significant offsite impacts on people or the biophysical environment, a report must be supplied to DPHI outlining the basic facts of the incident. A further detailed report must be prepared and submitted following investigations of the causes and identification of the necessary additional preventative measures no later than 14 days after the incident or potential incident.

EPA will also be notified of an actual or potential incident with significant offsite impacts immediately following the incident or potential incident.

### 7.3 Emergency management

The POEO Act requires the occupier of premises, the employer or any person carrying out an activity which has caused a pollution incident to immediately notify each relevant authority when material harm to the environment is caused or threatened.

Persons responsible for reporting a pollution incident should follow this information and procedures:

- The person should call 000 if the incident presents an immediate threat to human health or property. Dialling 000 serves to contact Fire and Rescue NSW, the NSW Police and the NSW Ambulance Services.
- If the incident does not require any of the above-listed services, the 24-hour hotline for each of the following services can be called, as listed in Table 7.1.

Emergency contact details are listed in Table 7.1.

**Table 7.1**      **Emergency contact details**

Emergency organisation	Contact details
Police	000
Ambulance	000
Fire and Rescue NSW	000
Fire and Rescue Service Penrith	02 4784 8386 02 9493 1086
EPA's Environment Line	131 555
WorkSafe NSW	131 050
Sydney Water	13 20 90
Relevant energy provider	TBC
Wildlife Information Rescue Education Services (WIRES)	1300 094 737
Environmental representative (Alycia Campbell)	0437 468 258
Project Manager (Ewen Mckenzie)	0409 666 183

## References

Environment Protection Authority 2014, Waste Classification Guidelines – Part 1: Classification of Waste

Environment Protection and Heritage Council and Natural Resource Management Ministerial Council (EPHC and NRMCC) 2011, National Guidance for the Management of Acid Sulfate Soils in Inland Aquatic Ecosystems

NSW Safework 2016, How to Manage and Control Asbestos in the Workplace

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# Appendix A

Construction traffic management plan

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# **CONSTRUCTION TRAFFIC MANAGEMENT PLAN AND DRIVER CODE OF CONDUCT**



## **PENRITH WASTE RECYCLING AND TRANSFER FACILITY**

**MARCH 2025**

**Disclaimer:** Whilst Benedict will make every effort in good faith to communicate the contents of this document to heavy vehicle drivers frequenting the Penrith Waste Recycling and Transfer Facility (PRF), it cannot guarantee enforcement of nor compliance with any specific elements of the document for heavy vehicles which are beyond the PRF site boundary.

<b>Document Control</b>				
<b>Rev No</b>	<b>Date</b>	<b>Revision Details</b>	<b>Author</b>	<b>Reviewer</b>
01	16/11/2020	Draft	EM	ED
02	8/03/2021	DPIE comments	EM	IS
03	31/03/2025	MOD 2 Update	EM	DK

# CONTENTS

<b>1</b>	<b>Introduction</b>	<b>1</b>
1.1	Project overview	1
1.2	CEMP purpose and objectives	1
1.3	CEMP framework and approval	3
1.4	Project environmental assessment and approval overview	3
1.5	Project Staging	4
1.6	Project schedule	4
<b>2</b>	<b>Project overview</b>	<b>5</b>
2.1	Project description	5
2.2	Project setting	6
2.3	Construction works	6
<b>3</b>	<b>Legislative and other requirements</b>	<b>9</b>
3.1	Statutory requirements	9
<b>4</b>	<b>Implementation and operation</b>	<b>19</b>
4.1	Environmental roles and responsibilities	19
4.2	Training and awareness	21
4.3	Communication	22
4.4	Documentation	24
<b>5</b>	<b>Management of key environmental aspects and risks</b>	<b>27</b>
5.1	Noise management and control measures	27
5.2	Water	29
5.3	Air quality	31
5.4	Greenhouse gases	32
5.5	Heritage	33
5.6	Traffic and transport	34
5.7	Visual	35
5.8	Waste	35
5.9	Contamination	36
5.10	Hazardous goods, spills and leaks	37
5.11	Public safety	38
<b>6</b>	<b>Environmental management systems</b>	<b>39</b>
6.1	Safe Work Method Statements (or equivalent)	39
6.2	Monitoring and measurement	39
6.3	Audits and inspections	39
6.4	Non-conformance and corrective actions	40
<b>7</b>	<b>Environmental incidents and emergencies</b>	<b>41</b>
7.1	Public complaints	41

7.2	Incident response	41
7.3	Emergency management	42

<b>References</b>	<b>43</b>
-------------------	-----------

<b>1. INTRODUCTION</b>	<b>5</b>
------------------------	----------

1.1	BACKGROUND	5
-----	------------	---

1.2	LOCATION	5
-----	----------	---

1.3	HEAVY VEHICLE TRAFFIC ROUTE	7
-----	-----------------------------	---

<b>2. DRIVER CODE OF CONDUCT</b>	<b>9</b>
----------------------------------	----------

2.1	HEAVY VEHICLE SPEED	9
-----	---------------------	---

2.2	HEAVY VEHICLES DRIVER FATIGUE	9
-----	-------------------------------	---

2.3	HEAVY VEHICLES COMPRESSION BRAKING	10
-----	------------------------------------	----

2.4	HEAVY VEHICLE NOISE	10
-----	---------------------	----

2.5	LOAD COVERING	10
-----	---------------	----

2.6	VEHICLE DEPARTURE AND ARRIVAL	10
-----	-------------------------------	----

2.7	MONITORING PROGRAM AND INCIDENT REPORTING	11
-----	---	----

<b>APPENDIX A</b>	<b>A.12</b>
-------------------	-------------

<b>APPENDIX B: CTMP REVIEW – Appropriately Qualified Person</b>	<b>A.13</b>
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## 1. INTRODUCTION

### 1.1 BACKGROUND

Benedict Recycling Pty Ltd (Benedict) is the operator of the Penrith Waste Recycling and Transfer Facility (PRF) located at 46-48 Peachtree Road, Penrith.

The construction and operation of a transfer station to receive up to 180,000 tonnes per annum of General Solid Waste (non-putrescible) was approved on the site by the NSW Department of Planning and Environment under application number SSD 7733 on 15 May 2020. The requirements of the Development Consent have been included in this plan.

Condition B12 of the development consent for SSD 7733 approving the construction and operation of the facility stipulates that a Construction Traffic Management Plan/Driver Code of Conduct be developed as a component of the Consent.

The purpose of this document is to ensure road safety and network efficiency, detail truck route and parking as well as minimise the impact of heavy vehicle traffic associated with PRF on the local and regional road network, and on other road users.

A Modification was made to the facility design in 2024, and this was approved by DPIE on 19<sup>th</sup> December 2024. Changes included minor modifications to the building design to accommodate fire exits and pathways, increased rainwater tank capacity from 4,000L to 90,000L, installation of a new 15,000L underground diesel tank, addition of Colorbond cladding to the top 3 meters of the masonry wall facing the street frontage, and other minor layout and design changes.

This document has been modified accordingly.

### 1.2 LOCATION

The facility is located at 46-48 Peachtree Road, Penrith NSW and is within the local government area of Penrith Council. The site occupies Lot 45 DP 793931, with a total land area of 4367m<sup>2</sup>.

Figure 7.1 shows the location of the site and the surrounding road networks. The predominant access will be from Castlereagh Road onto Peachtree Road and back. The site is bounded by industrial and commercial development on all sides.

Figure 7.1 Site Location Map



### 1.3 HEAVY VEHICLE TRAFFIC ROUTE

When travelling to PRF heavy vehicles will typically turn off Castlereagh Road using the signalized intersection at Peachtree Road. For the combined waste received and products dispatched traffic movements, the distribution to and from the site would normally be:

- Approximately 50% to and from Castlereagh Road, north of the Peachtree Road intersection; and
- Approximately 50% to and from Castlereagh Road, south of the Peachtree Road intersection.

Waste material will not normally be brought to the site or products dispatched via Thornton Drive which connects to local areas to the east of Castlereagh Road from the Peachtree Road intersection.



Figure 7.2 Traffic Routes



Site location and assessed intersection  
 Penrith Waste Recycling and Transfer Facility  
 Traffic Impact Assessment



## 2. DRIVER CODE OF CONDUCT

Benedict Recycling will implement all reasonable and feasible measures to minimise the impact of traffic generated by the operations of PRF on the efficient and safe operation of the local road network, in particular Peachtree Road. As part of their site induction, drivers of heavy vehicles associated with PRF operations will be notified that queuing or parking on Peachtree Road is to be avoided.

All heavy vehicles hauling to and from the PRF site must:

- i. Have undertaken a site induction carried out by an approved member of the PRF staff or suitably qualified person under the direction of the PRF management;
- ii. Have comprehension of the relevant requirements of the RMS Heavy vehicle driver handbook;
- iii. Hold a valid driver's licence for the class of vehicle that they operate;
- iv. Operate the vehicle in a safe manner within and external to the PRF site;
- v. Comply with the direction of authorised site personnel when within the site.

A single page document detailing the *Site Access Traffic Route* and summarising other key aspects of heavy vehicle related compliance will be kept at the site weighbridge for reference purposes. A sample of this document can be found in Appendix A.

### 2.1 HEAVY VEHICLE SPEED

Increased speed means not only an increased risk of collision but also increased severity if an accident does occur. A study undertaken for the Australian Transport Safety Bureau found that travelling 10km/h faster than the average traffic speed can more than double the risk of involvement in a casualty accident (source: Roads and Maritime Services).

There are two (2) types of speeding:

1. Where a heavy vehicle travels faster than the posted speed limit; and
2. Where a driver travels within the speed limit but due to road conditions (e.g. fog or rain) this speed is inappropriate (source: Roads and Maritime Services).

Drivers and truck operators are to be aware of the 'Three Strikes Scheme' introduced by the Roads and Maritime Services (RMS) which applies to all vehicles over 4.5 tonnes. When a heavy vehicle is detected travelling at 15km/h or more over the posted or relevant heavy vehicle speed limit by a mobile Police unit or fixed speed camera, the RMS will record a strike against that vehicle. If three strikes are recorded within a three (3) year period, the RMS will act to suspend the registration of that vehicle (up to three months).

More information is available from the Roads and Maritime Services (RMS) website.

Vehicle speed on public roads is enforced by the NSW Police Service.

The speed limit within the PRF site is 10 km/h which is to be strictly maintained.

All heavy vehicle drivers associated with Penrith Recycling facility operations are to observe the posted speed limits, with speed adjusted appropriately to suit the road environment and prevailing weather conditions, to comply with the Australian Road Rules. The vehicle speed must be appropriate to ensure the safe movements of the vehicle based on the vehicle configuration.

### 2.2 HEAVY VEHICLES DRIVER FATIGUE

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

The Heavy Vehicle (Fatigue management) National Regulation 2013 (NSW) commenced in NSW on 12 February 2014 and applies to trucks and truck combinations over 12 tonne GVM (however there are Ministerial Exemption Notices that can apply).

Under the law, industry has the choice of operating under three (3) fatigue management schemes:

- Standard Hours of Operation
- Basic Fatigue Management (BFM)
- Advanced Fatigue Management (AFM)

All heavy vehicle drivers associated with the Penrith Recycling facility operations are to be aware of their adopted fatigue management scheme and operate within its requirements.

### 2.3 HEAVY VEHICLES COMPRESSION BRAKING

Compression braking by heavy vehicles is a source of irritation to the community, generating many complaints, especially at night when residents are especially sensitive to noise.

In some instances, compression braking is required for safety reasons, however, when passing through or adjacent to residential areas a reduction in the speed of the vehicle is recommended to reduce the instances and severity of compression braking.

### 2.4 HEAVY VEHICLE NOISE

The operating hours for transportation of materials to and from PRF are mentioned in Table 7.2

Table 7.2 Operating Hours

Construction Phase	
Monday – Friday	7.00am to 6.00pm
Saturday	8.00am to 1.00pm
Operational Phase	
Monday – Friday	6.00am to 10.00pm
Saturday	6.00am to 6.00pm
Sunday	8.00am to 4.00pm

Condition B25 of the development consent stipulates that work outside of the above hours may be undertaken in the following circumstances:

- Works that are inaudible to the nearest sensitive receptors
- Works agreed to in writing by the Planning Secretary
- for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or
- where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.

### 2.5 LOAD COVERING

Loose material on the road surface has the potential to cause road crashes and vehicle damage.

- All heavy vehicles arriving at or departing from the Penrith Recycling Facility that are carrying loads of dust generating material must have their loads covered at all times, except during loading and unloading.
- All care is to be taken to ensure that all loose debris from the vehicle body and wheels is removed prior to leaving the site.
- Drivers must ensure that following tipping, the vehicle tailgate is locked before leaving the site.

### 2.6 VEHICLE DEPARTURE AND ARRIVAL

Heavy vehicles travelling in close proximity on a single lane public road can be of concern to light vehicle drivers as well as increasing noise through or adjacent to residential areas. Outgoing traffic leaving the site via the weighbridge is typically separated by a minimum of approximately two (2) minute intervals whilst weighbridge dockets are generated and/or payment is processed.

## 2.7 MONITORING PROGRAM AND INCIDENT REPORTING

e) The effectiveness of the Driver Code of Conduct will be monitored via the following:

1. Inductions

- All drivers associated with the project will be trained on the Driver Code of Conduct through the induction process.
- Inductions will record individual details and warrant that inductees are aware of and shall comply with the Driver Code of Conduct.

2. Toolbox Talks

- As required, Toolbox Talks will be conducted related to traffic management, current incidents, and the Driver Code of Conduct.
- The frequency of these Toolbox Talks will be based on traffic related issues (sourced from incident reporting data) that may arise during construction.
- Toolbox Talk records will be maintained.

3. Incident Reporting

- To assist in the orderly resolution of complaints, site management will keep a register itemising all reported incidents relating to complaints regarding heavy vehicle driver conduct external to the site, or where there a non-compliance with the Driver Code of Conduct is identified.
- Information to be logged is to include (where possible):
  - i. Date
  - ii. Location/s
  - iii. Driver/heavy vehicle details
  - iv. Contact details of person lodging the complaint;
  - v. What/when actions were taken to resolve the issue; and
  - vi. The response made to the complainant.



## APPENDIX A

## Site Access Traffic Route



Arriving vehicles



Departing vehicles



## ALL CUSTOMERS TO COMPLY WITH THE FOLLOWING:

- Avoid queuing and parking on Peachtree Road
- Cover loads at all times except during loading and unloading
- Remove loose debris from vehicle body and wheels before leaving the site
- Ensure tailgate is locked before leaving site
- Observe all local and site speed limits
- Minimise noise from driving or braking

---

**APPENDIX B: CTMP REVIEW – Appropriately Qualified Person**

---

25 March 2021

Katelyn Symington  
Senior Environmental Assessment Officer  
Department of Planning, Industry & Environment  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2124



Ground floor, 20 Chandos Street  
St Leonards NSW 2065  
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T 02 9493 9500  
E [info@emmconsulting.com.au](mailto:info@emmconsulting.com.au)

[www.emmconsulting.com.au](http://www.emmconsulting.com.au)

**Re: 46 Peachtree Road, Penrith Waste Management Facility - Review of Construction Traffic Management Plan (CTMP)**

---

Dear Katelyn,

I have reviewed the CTMP prepared by Benedict (dated 16 November 2020) for the subject development. I can confirm that it generally addresses the traffic management during construction stages of the development and includes drivers code of conduct.

My CV is attached with this letter outlining my experience in traffic engineering.

Please feel free to contact if you have any questions.

Yours sincerely

**Abdullah Uddin**  
Associate Traffic Engineer  
[audin@emmconsulting.com.au](mailto:audin@emmconsulting.com.au)  
0425 478 650



# Abdullah Uddin

Associate Traffic Engineer

## Curriculum vitae

Abdullah has worked as a traffic engineer for over 17 years and has significant knowledge and experience in managing traffic engineering and planning projects. He has in depth knowledge of relevant traffic engineering codes and guidelines including development and planning.

Abdullah has managed multidisciplinary teams and significant experience on authority liaison and negotiation on large infrastructure projects. He has considerable experience in traffic impact assessments, car park design, strategic transport planning and road safety reviews with a view to sustainability. Abdullah has a strong understanding on the traffic engineering software including SIDRA, Auto CAD and GIS.

## Qualifications

- Bachelor of Civil Engineering, Khulna University of Engineering and Technology, Bangladesh, 1998
- Post Graduate Diploma in Information Technology, University of Southern Queensland, 2001
- Master of Engineering Studies, University of Technology Sydney, 2011
- Chartered Professional Member of Engineers Australia (CPEng)
- Current TfNSW Prepare a Work Zone Traffic Management Plan certificate
- NSW Committee Member of the Australian Institute of Traffic Planning Management (AITPM)

## Career

- EMM Consulting, 2019 – Present
- Senior Traffic Engineer, PTC, 2017-2019
- Manager Traffic and Transport, Lane Cove Council, 2015-2017
- Senior Traffic Engineer, Bayside Council, 2011–2015
- Traffic Engineer, Arup, 2007-2011
- Traffic Engineer, Inner West Council, 2005-2007
- Traffic Engineering Assistant, Cumberland Council, 2004-2005

## Representative experience

### Mining, quarry and infrastructure projects

- Great Cobar mine extension, traffic impact assessment (Aurelia Metals)
- Queen Bee mine haulage transportation assessment (Peak Goldmine)
- Lake Cowal mine traffic assessment for mine extension and workers accommodation village (Evolution Mining)
- Balranald mine modification traffic assessment (Iluka Resources)
- Luddenham quarry Mod5 and SSD for the recycling facility (Coombes Property Group & KLF Holdings Pty Ltd)
- Townsville Energy Chemicals Hub (Queensland Pacific Metals Pty Ltd)



### Transport planning projects

- Victoria Park, Zetland Masterplan, NSW (TSA Project Management)
- Mascot Transport management and accessibility plan (TMAP), NSW (Bayside Council)
- Harold Park Paceway, Glebe Land Use and transport accessibility study, NSW (City of Sydney)
- St Leonards and Lane Cove microsimulation modelling projects, NSW (Lane Cove Council)
- Sutherland & Cronulla transport interchange feasibility study, NSW (RailCorp)
- Sydney light rail feasibility analysis (TfNSW)

### Traffic engineering projects

- Peakhurst, Penhurst & Punchbowl School developments (SINSW)
- Campbelltown, Wagga Wagga, Nepean, Katoomba, Liverpool, Griffith Hospital developments, NSW (Health NSW)
- World Square car park and loading dock development (JLL)
- Goulburn Street car park design study, (City of Sydney)
- B-Double route assessment, Matraville NSW (Randwick Council)
- Macquarie University private hospital road safety review, Macquarie NSW (Macquarie University)

### Parking study projects

- Georges River Council parking strategies, NSW (Georges River Council)
- Marrickville resident and business parking strategy (Inner West Council)
- Ku-ring-gai town centre parking strategy (Ku-ring-gai Council)

### Active transport projects

- Moore Park Road pop-up cycleway REF (City of Sydney)
- Lane Cove and City of Canada Bay bike plan, NSW (Lane Cove and City of Canada Bay Councils)
- Lane Cove & Willoughby Council pedestrian and mobility plan (PAMP), NSW (Lane Cove & Willoughby City Councils)
- Powells Creek bicycle option developments (Strathfield Council)

[www.emmconsulting.com.au](http://www.emmconsulting.com.au)



Servicing projects  
throughout  
Australia and  
internationally

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St Leonards NSW 2065



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# Appendix B

Erosion and sediment control plan




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# Penrith Waste Recycling and Transfer Facility

## Preliminary Construction Erosion and Sediment Control Plan

Version 1 dated 1/04/2025

### Legend

- Coir logs (or equivalent) 
- Sediment fence on downslope boundary 
- Runoff direction 

### Notes:

Coir logs to be placed across driveways when works not occurring or during rainfall events that would cause run-off to exit site

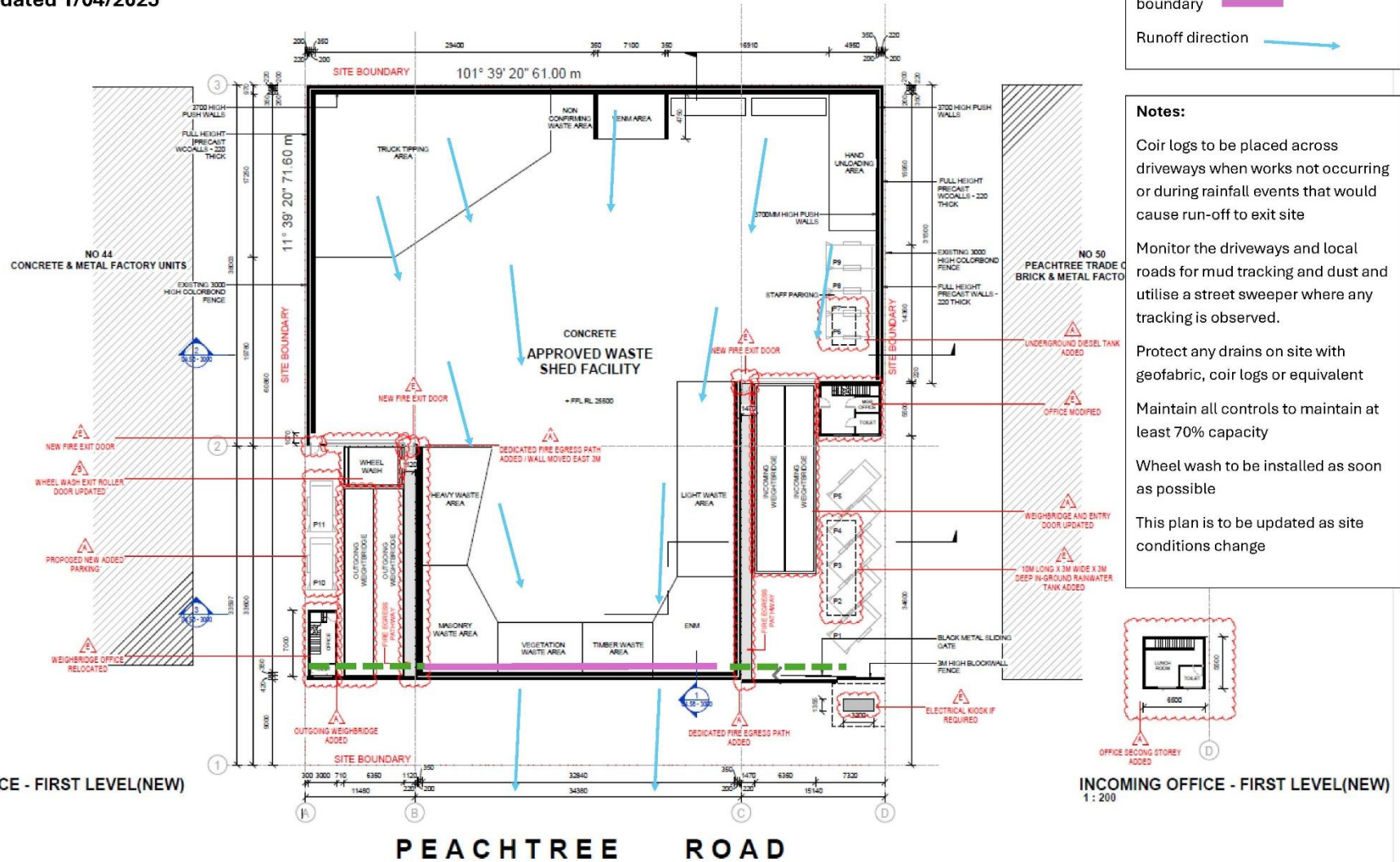
Monitor the driveways and local roads for mud tracking and dust and utilise a street sweeper where any tracking is observed.

Protect any drains on site with geofabric, coir logs or equivalent

Maintain all controls to maintain at least 70% capacity

Wheel wash to be installed as soon as possible

This plan is to be updated as site conditions change



---

# Appendix C

Facility plans and drawings

---

REGULATION DESIGN RECORD				
PROJECT ADDRESS: 4648 FRANCHISE ROAD, PLYMOUTH				
PROJECT TITLE: WASTE MANAGEMENT				
CONSENT NO. CDC APPLICATION			BODY COORDINATE REC NO. 8709027	
DRAWING TITLE: COVER SHEET			DRAWING NO: 64-06-10000	
REV	DATE	DESCRIPTION	REV'D BY NAME	REV NO
0	1/20/2021	ISSUED FOR MEU	DAVID A. GAGNON: A ZUEP	001
1	1/20/2021	ISSUED FOR MEU	TRU W. CARTER: Y	002
2	2/20/2021	ISSUED FOR MEU	K. J. YUL	003
			UNCLASSIFIED	

**WASTE MANAGEMENT FACILITY  
AT  
46 PEACHTREE ROAD, PENRICH  
S4.55 MODIFICATION**

ARCHITECTURAL			
SHEET	SHEET NAME	REV	DATE
54.05 - 2030	GROUND FLOOR PLAN	E	24/09/2024
54.05 - 2036	GROUND FLOOR PLAN	D	24/09/2024
54.05 - 2030	SEC FLOOR PLAN	D	15/09/2024
54.05 - 2030	ELEVATION - NORTH & SOUTH	D	18/09/2024
54.05 - 2031	ELEVATION - EAST & WEST	D	15/09/2024
54.05 - 2030	CLAY COMPASSION	B	18/09/2024
54.05 - 2031	CLAY COMPASSION	D	25/09/2024

These are the first studies to show that the brain can be trained to respond to a specific stimulus. The results suggest that the brain can be trained to respond to a specific stimulus, and that this training can be used to improve the brain's ability to respond to a specific stimulus. The results also suggest that the brain can be trained to respond to a specific stimulus, and that this training can be used to improve the brain's ability to respond to a specific stimulus.

LEGEND:

PROJECT:  
#2024076  
**WASTE  
MANAGEMENT**  
48-48 PEACHTREE ROAD, PEWORTH  
CLIENT: NSW WASTE SERVICES

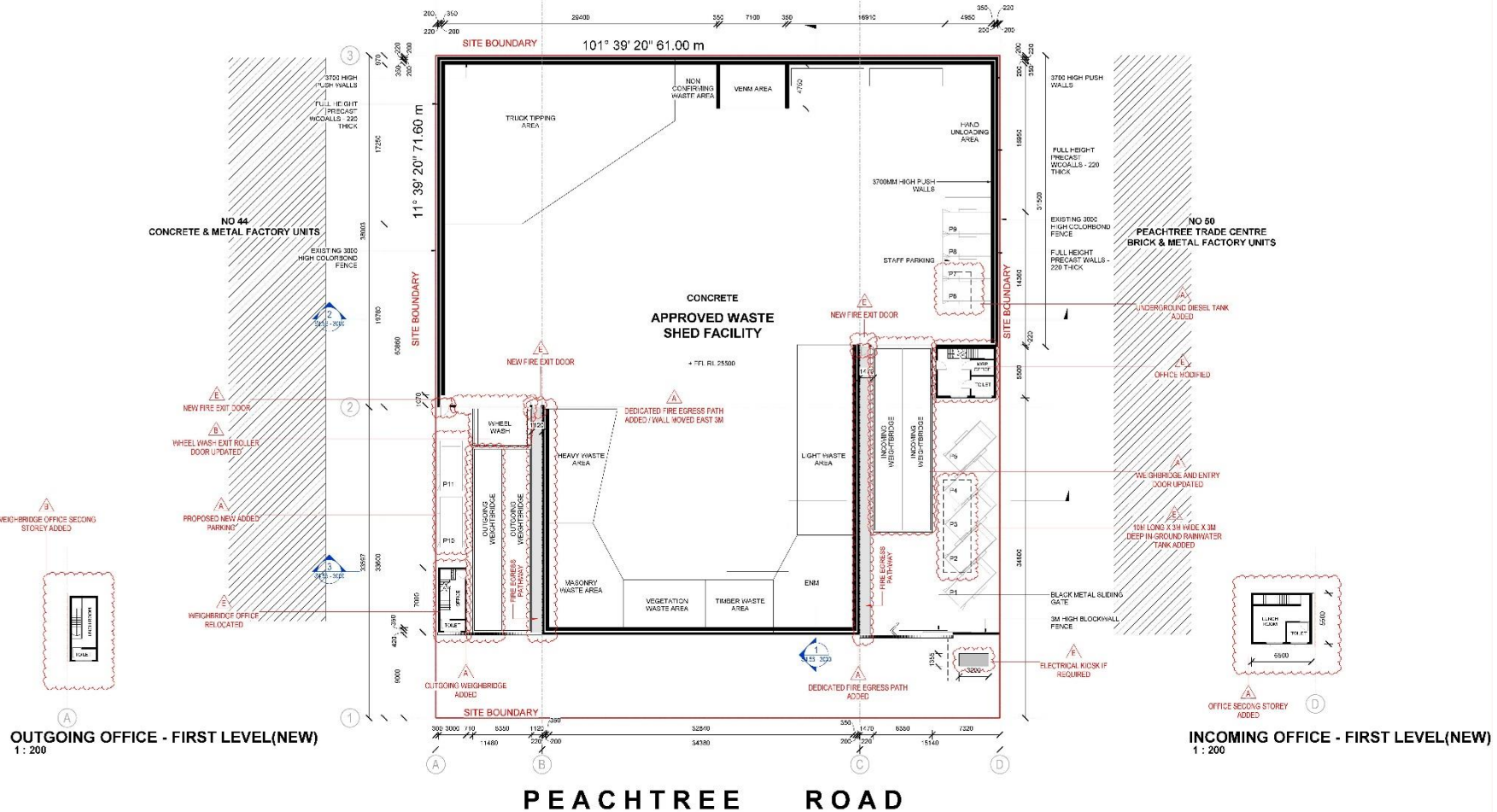
DRAWING TITLE:  
**COVER SHEET**

SHEET NUMBER:  
**S4.56 - 0000**  
DATE: 03/09/2004

REV: D

ARCHITECT:  
**PLACE**  
S T U D I O  
PLACE STUDIOS INC.  
1000 10th Ave. S.W. #1000  
Seattle, WA 98108  
Tel: 206.325.9064 | J.A.S@PLACESTUDIO.COM  
W: www.placestudio.com | R: 206.325.9064

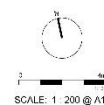
REGULATION DESIGN RECORD				
PROJECT ADDRESS: 48-50 PEACHTREE ROAD, PEACHTREE				
PROJECT: TILB WASTE MANAGEMENT				
CONSENT NO. 000 APPLICATION		ECONOMIC DEVELOPMENT		
PROPOSER: TILB WASTE MANAGEMENT	DATE: 14/11/2023	PROJECT NO. 14/11/2023	PROJECT NO. 14/11/2023	PROJECT NO. 14/11/2023
REV. 1	DATE: 14/11/2023	DESCRIPTION: TILB WASTE MANAGEMENT	PROJECT NO. 14/11/2023	PROJECT NO. 14/11/2023
2	14/11/2023	ISSUE FOR NO. 000	PROJECT NO. 14/11/2023	PROJECT NO. 14/11/2023
3	14/11/2023	ISSUE FOR NO. 000	PROJECT NO. 14/11/2023	PROJECT NO. 14/11/2023



NOTES:

1. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE SPECIFIED.
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LEGEND:



PROJECT:  
#2024076  
**WASTE MANAGEMENT**  
48-50 PEACHTREE ROAD PEACHTREE  
CLIENT: NSW WASTE SERVICES

**SECTION 4.55 MODIFICATION**

DRAWING TITLE:  
**GROUND FLOOR PLAN**

ARCHITECT:  
**PLACE**

SHEET NUMBER:  
**\$4.55 - 2000**

REV:  
**E**

DATE: 14/11/2023

Journal Pre-proof



DRAWING TITLE:  
**GROUND FLOOR PLAN**

SHEET NUMBER:  
**S4.56 - 2000**  
DATE 2/1/2004

REV  
F

ARCHITECT:  
**PLACE**  
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**Abstract** The purpose of this study was to determine the effect of a 12-week training program on the aerobic and anaerobic performance of young men. Twenty-four subjects were divided into two groups: a control group and an experimental group. The experimental group performed a 12-week training program consisting of three sessions per week. The control group did not perform any training. The experimental group showed significant improvements in aerobic and anaerobic performance compared to the control group. The results of this study suggest that a 12-week training program can improve the aerobic and anaerobic performance of young men.



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SCALE: 1 : 200 @ A1

## SECTION 4.55 MODIFICATION

SHEET NUMBER:  
**S4.56 - 3000**  
DATE: 15/08/2024

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LEGEND:

## SECTION 4.55 MODIFICATION

DRAWING TITLE:  
**ELEVATION - NORTH & SOUTH**

SHEET NUMBER:  
**S4.56 - 4000**  
DATE: 18/06/2024

REV.  
D

ARCHITECT:  
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2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 2681,

3 4m  
SCALE: 1 : 200 @ A1

## SECTION 4.55 MODIFICATION

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SHEET NUMBER:  
**S4.56 - 4000**  
DATE 2/2/1937

[illegible]

LEGEND:



## SECTION 4.55 MODIFICATION

DRAWING TITLE:  
**ELEVATION - EAST & WEST**

SHEET NUMBER:  
**S4.56 - 4001**  
DATE: 18/06/2024

REV.  
C

ARCHITECT:  
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Architectural floor plan of a room. The plan is divided into a large orange-hatched area and a smaller white area. The orange area is a large rectangle with a diagonal hatch pattern. The white area is located in the bottom right corner and contains a desk, a chair, and a small table. The plan is bounded by a grid system with labels 1, 2, 3 vertically and A, B, C, D horizontally. Dimensions are provided: 4200, 2600, 825, 5500, and 16165.

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<h2 style="text-align: center;">REGULATION DESIGN RECORD</h2> <p>PROJECT ADDRESS: 200-10000 "KACHITSE" ROAD, POCHIMI</p> <p>PROJECT: "ELECTRICITY TRANSMISSION"</p>			
CONSENT NO. / CDC APPLICATION TRANSMISSION TITLE: P. P. A. COORDINATES:		BODY CORPORATE REG. NO. SPAN: / DRAWING NO. 54.58 - 4021	
DATE 10/01/2024	DRAWN BY RAJESH K. P.	CHECKED BY RAJESH K. P.	DATE 10/01/2024

PROJECT TITLE: WASTE MANAGEMENT			
CONSENT NO. CDC APPLICATION		BODY CORPORATE REG. NO. SP/REG/2	
TRAINING T.F. P. A. K. COMPARISON		DRA. NO. 54.56 - 62/1	
Sl. No.	DATE	DESCRIPTION OF	REMARKS
1	10/04/2024	PROJECT PROPOSED	APPROVED
2	10/04/2024	PROJECT PROPOSED	APPROVED
3	10/04/2024	PROJECT PROPOSED	APPROVED



DRAWING TITLE:  
**PLAN COMPARISON**

SHEET NUMBER:  
**S4.56 - 6001**

REV:  
D

ARCHITECT:  
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SCALE: 1 : 300 @ A1

PROJECT:  
#2024076  
**WASTE  
MANAGEMENT**  
45-48 PEACHTREE ROAD, PEVRITH

CLIENT: NSW WASTE SERVICES

**Journal Notes**  
 On 12/12/2012, I received a letter from the American Psychological Association (APA) regarding my article, "The Role of the Therapist in the Treatment of Post-Traumatic Stress Disorder (PTSD)" published in the *Journal of the American Psychological Association*. The letter stated that the APA had received a request from a third party to remove the article from the journal's online archive. The APA informed me that the third party claimed to be the author of the article and requested that the APA remove the article from its database. The APA stated that it was unable to verify the identity of the third party and therefore could not remove the article from its database. I responded to the APA by stating that I was the author of the article and that I did not wish to have it removed from the journal's online archive. The APA informed me that it would not remove the article from its database and that it would continue to make the article available to its subscribers.

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