

# **Mayfield West Resource Recycling Facility**

## **Conceptual Decommissioning Management Plan**

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Prepared for Benedict Recycling Pty Ltd.

April 2025

# Mayfield West Resource Recycling Facility

## Conceptual Decommissioning Management Plan

Benedict Recycling Pty Ltd.

J14152 Report #7

April 2025

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Approved by



**Phil Towler**

Associate Director

30 April 2025

Level 10 201 Pacific Highway

St Leonards NSW 2065

ABN: 28 141 736 558

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# 1 Introduction

## 1.1 Background

Benedict Recycling Pty Ltd (Benedict) is the operator of the Mayfield West Recycling Facility (MWRF) located at 1A McIntosh Drive, Mayfield West.

Development Consent (SSD 7698) granted on 13 March 2018 permits the operation of the resource recovery facility, with a capacity to accept and process up to 315,000 tonnes per year of general solid waste (non-putrescible). Subsequently, the following modifications have been approved:

- Modification 1: to amend the works boundary and relocate the public hand unloading area – approved 27 October 2021.
- Modification 2: to receive, treat and export up to 30,000 tonnes per annum of actual acid sulfate soils and potential acid sulfate soils – approved 13 June 2023.
- Modification 3: to relocate the approved actual and potential acid sulfate soils receipt and processing from the main processing building to an existing vacant building (Mag Shed) on the site – approved 18 February 2025.

The 'Development Consent (as modified)' is the consent as modified by Modification 1, 2 and 3.

Condition B84 of the project approval consent stipulates that a Conceptual Decommissioning Management Plan (CDMP) for the facility be prepared.

## 1.2 Location

The facility is located at 1A McIntosh Drive, Mayfield, NSW and is within the Newcastle City Council local government area.

The SSD approved site occupies part of Lot 1 in DP 874109. The residual eastern part of Lot 1 in DP 874109 (approximately 37,400 m<sup>2</sup>) is a Council-approved waste ancillary services facility and includes parking and temporary storage for equipment and bins. With MOD3 approval, the facility will utilise some 16,100 m<sup>2</sup> of space that would be added to the SSD area which included within the existing enclosed Mag Shed building. The remaining 21,300 m<sup>2</sup> will remain as Ancillary waste area outside of the SSD area and subject to the Council Consent

The Lot is bounded by the Hunter River (South Arm) to the north, Tourle Street to the east, Ausgrid Mayfield West Substation to the south and light industrial buildings to the west. Figure 1.1 shows the layout of the MWRF.

## 1.3 Purpose of the Conceptual Decommissioning Management Plan

The purpose of the CDMP is to provide a structured approach to the management of the future decommissioning of the facility. This will ensure the appropriate management of environmental issues during decommissioning and ensure that unprocessed or processed waste is not left on the site.

This CDMP provides:

- the relevant statutory considerations pertaining to the decommissioning of the facility
- a schedule for the decommissioning of the facility
- a description of decommissioning activities

- a description of site validation activities to ensure that the contamination status of the site is no worse than that described in the Site Audit Report-Former EMD Facility Mayfield West, prepared for Delta EMD, prepared by Environ Australia Pty Ltd, November 2009
- notification procedures of the surrounding land-owners and provisions to ensure public safety
- the monitoring activities to be carried out during decommissioning
- minimum mitigation measures and controls that would be applied during decommissioning to avoid or minimise negative environmental impacts.



Figure 1.1 Site Layout Mayfield West Recycling Facility



## 2 Statutory considerations

### 2.1 Development Consent SSD 7698

The facility is approved to operate under Development Consent SSD 7698 pursuant to Section 4.38 of the *Environmental Planning and Assessment Act 1979*. The CDMP has been prepared to address consent condition B84 which requires the preparation of a CDMP for inclusion in the Operational Environment Management Plan (OEMP). The CDMP must include:

**Table 2.1** Development consent requirements

Condition	Requirement	Location
B84	Prior to the commencement of operations, the Applicant must prepare a Conceptual Decommissioning Management Plan (CDMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C4.	This document
B84(a)	Include a schedule for the decommissioning of the Development.	Section 3.1
B84(b)	Detail how the following would be achieved: i) ensure the site is left in a safe, stable and non-polluting manner ii) removal of all waste from the site in a lawful manner iii) restoration of the site so that the contamination status is no worse than that described in the Site Audit Report -Former EMD Facility Mayfield West, prepared for Delta EMD, prepared by Environ Australia Pty Ltd, November 2009 iv) ensure public safety is maintained.	Section 3.2 Section 3.2 Section 3.2.1 Section 4.1
B84(c)	Include procedures for notification of the surrounding landowners.	Section 4.2
B84(d)	Include procedures for safe removal of any machinery and structures.	Section 3.2
B84(e)	Include measures to mitigate any environmental impacts associated with the removal of the Development.	Chapter 6
B84(f)	Include details of monitoring that would be undertaken during the decommissioning of the Development.	Chapter 5
B84(g)	Be reviewed 12 months prior to the closure of the site to the satisfaction of the Planning Secretary.	

Notes: Adapted from development consent for application No SDD7698-MOD-3 dated 18 February 2025.

### 2.2 Environment Protection Licence

The MWRF operates under Environment Protection Licence (EPL) number 20771. The EPL may be surrendered with the written approval of the EPA, once scheduled activities cease on site.

Standard operational measures as outlined in the OEMP will continue to be applied during decommissioning. These include:

- Removal of wastes from the site during decommissioning activities, will be in accordance with licensed specified operating times for despatch of waste being: 6:00 am to 6:00 pm Monday to Saturday. Removal of waste will not be carried out on Sundays.
- Decommissioning activities will be undertaken so they comply with the noise limits prescribed in the EPL.

- Decommissioning activities will be undertaken so that they minimise the generation or emission from the premises of wind-blown or traffic generated dust with all trucks entering and leaving the premises will have their loads covered at all times, except during loading activities.
- Monitoring requirements of the EPL will continue to be met during decommissioning activities until written approval from the EPA accepts the surrender of the EPL.
- The complaints line required by the EPL are maintained during decommissioning activities.

## 2.3 Newcastle Local Environmental Plan 2012

Pursuant to Clause 2.7 of the *Newcastle Local Environmental Plan 2012* (Newcastle LEP) demolition of a building or work may be carried out only with development consent. It is intended to leave the existing buildings and structures in place following decommissioning the MWRF with only the above ground fuel tank, demountable offices, wheel wash and water tanks being removed from the site.

In the event, demolition of existing buildings is proposed, development consent under Part 4 of the EP&A Act would be required and accordingly a Development Application would be prepared and submitted to Newcastle City Council.



## 3 Site decommissioning

### 3.1 Indicative decommissioning schedule

An indicative decommissioning schedule is provided in Table 3.1.

**Table 3.1** Indicative decommissioning schedule

No.	Task	Timing
1	Decision to close the MWRF and subsequent review of this CDMP	2 weeks
2	Planning Secretary's review of the reviewed CDMP	2 weeks
3	Closure of MWRF and commencement of site decommissioning	12 months from item 2
4	Removal of waste	Up to 1 months
5	Restoration of the site	1 month
6	Site validation	1 month

### 3.2 Decommissioning activities

#### 3.2.1 Removal of waste

During twelve months lead up to closure of the facility, the Site Operational Manager will endeavour to reduce the amount of unprocessed and processed waste stored on site. Nevertheless, an estimate of required time to remove all unprocessed and processed waste from the site has been based on a worst-case scenario of 53,733 tonnes of material being on site at the time of closure.

Processed waste that could not be sold, as well as unprocessed waste, would be transported to an appropriately licensed waste facility. Removal of waste will require up to 1,791 dispatches of truck and dog loads (each carrying a load of 30 tonnes). Approximately 30 to 100 loads will be dispatched per day with removal of waste activities taking up to one to three months. These truck movements are less than the number of truck movements assessed for operations.

Removal of waste will be carried out during approved hours of waste dispatch, being 6:00 am to 6:00 pm Monday to Friday and 6:00 am to 5:00 pm Saturday. No waste will be removed on Sundays. Waste would be removed from site in accordance with the Operational Environment Management Plan (OEMP) and relevant sub plans, in particular the Operational Traffic and Pedestrian Management Plan, Air Quality Management Plan and the Waste Management Plan. Waste will also be removed in accordance with relevant EPL conditions.

#### 3.2.2 Site restoration and validation

Site restoration activities include:

- ensuring all waste material is removed from site
- removal of 40,000 L diesel tank
- removal of weighbridge
- removal of truck wheel wash
- removal of demountable site offices and ablutions

- removal of three stage pit and holding tanks
- removal of sediment from perimeter drain and sedimentation basin.

The diesel tank will be drained, with fuel not suitable for reuse removed by a licensed oil recycler. The tank would either be transported appropriately to another facility for reuse or disposed of at a waste facility licensed to accept above ground fuel tanks in accordance with Australian Standards.

Removed sediment will be dewatered on site, tested for reuse or disposed of to an appropriately licensed facility.

The three-stage pit and holding tanks excavation will be back-filled with material complying with the requirements of the *Site Management Plan for Subsurface Disturbance Activities, McIntosh Drive Mayfield NSW* (AECOM 2009) which include determining that the material is suitable for commercial/industrial land use.

Any demolition works of the main processing shed or other structures will require a development application being lodged with council prior to demolition works proceeding.

### 3.2.3 Site validation

Site validation activities would include validation sampling to confirm contamination of the site is no worse than the contamination documented in the *Site Audit Report -Former EMD Facility Mayfield West, prepared for Delta EMD*, prepared by Environ Australia Pty Ltd, November 2009.

The methodology for the site validation sampling will be determined in consultation with the EPA and may include sampling from the sediment basin, groundwater samples and/or soil samples taken from the three-stage pit excavation. Any subsurface monitoring would be conducted in accordance with *Site Management Plan for Subsurface Disturbance Activities, McIntosh Drive Mayfield NSW* (AECOM 2009) including implementation of the following measures:

- site manager and all other parties involved in the site validation sampling will review the SMP and be familiar with management requirements for any areas that will be disturbed by monitoring activities
- all subsurface sampling will be carried out during dry weather and in accordance with the OEMP and relevant sub plans
- sediment control measures will be strategically placed around sampling locations
- excavated material not back-filled immediately will be stockpiled on a sealed and bunded surface.

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.

## 4 Public safety and community notification

### 4.1 Public safety

The decommissioning works would be carried out in accordance with the OEMP, relevant sub plans and the EPL thereby ensuring public safety. Following closure of the site, Benedict Recycling will maintain the existing security fencing on the site up until sale or leasing of the site.

### 4.2 Community notification

Benedict Recycling would notify adjacent landowners, sensitive receivers, relevant regulatory authorities and other interested stakeholders of the MWRF closure. Community consultation activities carried out prior to the commencement of and during decommissioning activities will include:

- Notification of the closure of the site and status updates during decommissioning activities will be posted on the Benedict website.
- Written notification will be provided to adjacent landowners, sensitive receivers, relevant regulatory authorities prior to the start of decommissioning activities and following the conclusion of decommissioning activities. Notification leaflets will provide email, telephone contact details and Benedict website address.

The community telephone line complaints line required to be maintained by the current EPL will be maintained during decommissioning activities. The complaints handling procedure documented in the OEMP would be maintained until decommissioning has concluded. This procedure is identified in Table 4.1.

**Table 4.1** Complaints procedure

Procedure		
1	Reporting	Complaints received from an outside party will be reported immediately to the Site Leading Hand/Supervisor and the Site Manager.
2	Investigations	Any complaint received will be investigated including: <ul style="list-style-type: none"><li>• the cause of the complaint</li><li>• the climatic conditions at the time of the incident which is the cause of the complaint</li><li>• if known, the date and time the incident took place</li><li>• the occurrence of similar complaints in the past and</li><li>• actions taken in the past to overcome future complaints.</li></ul>
3	Recording	Details of the complaint received, investigations and actions taken will be recorded on MWRF's complaints register, updated on a monthly basis and published on the company website. Records of complaints are to be kept for at least four (4) years.

## 5 Monitoring

Monitoring requirements of the SDD approval will be met during decommissioning activities and maintained until the MWRF is decommissioned. Monitoring requirements of the OEMP and relevant sub plans will also be maintained until the site is fully decommissioned.

Site validation monitoring will be carried out as detailed in Section 3.2.2 to ensure operation of the MWRF has not resulted in further contamination of the site to that documented in Environ Australia Pty Ltd, November 2009 Site Audit Report – Former EMD Facility Mayfield West prepared for Delta EMD.

## 6 Management measures

Management and mitigation measures documented in the OEMP would also apply to the decommissioning of the site. Relevant measures are presented in Table 6.1 below:

**Table 6.1** Management measures

Key issue	Management measure
Security	The site's security measures will continue to be implemented, including deployment of guards when the site is not operating (including at night), use of remotely accessed security cameras and maintenance of fences and gates.
Air quality	<p>The following management measures will continue to be implemented to minimise air quality impacts:</p> <ul style="list-style-type: none"> <li>• all existing sealed/hardstand areas will be retained</li> <li>• water sprays will be used over any other bare or unsealed surfaces that have not yet been sealed and have the potential to generate unacceptable amounts of dust</li> <li>• all vehicle movements will be restricted to designated routes marked out by appropriate signage and fencing using sealed internal roads</li> <li>• access to unsealed areas will be prevented</li> <li>• water sprays will be used at stockpiles, crushing and screening plants and during material handling as necessary</li> <li>• a wheel wash in the weighbridge area will be used during waste removal activities to clean truck tyres to prevent mud or sediment being carried to and deposited on the access road (and public roads)</li> <li>• existing sheds will be used to undertake particulate generating activities where possible</li> <li>• irrigation sprays will only be used when the surface of a stockpile is dry and irrigation will be ceased when the surface is wet and</li> <li>• dust and odour control procedures, including current monitoring requirements, will continue as detailed in the Air Quality Management Plan.</li> </ul>
Greenhouse gases	<p>The following management measures will continue to be implemented to minimise greenhouse gases emissions:</p> <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> </ul>
Noise	<p>The following management measures will continue to be implemented to minimise noise emissions:</p> <ul style="list-style-type: none"> <li>• operations will be limited to the hours and types of operations approved</li> <li>• machinery will be correctly operated and maintained</li> <li>• regular noise monitoring is conducted by the Site Leading Hand/Supervisor and any noise complaints received will be referred to the Site Leading Hand/Supervisor and to the Site Manager and</li> <li>• the two mobile screens in the segregated heavy waste processing and stockpiling area, the crusher/screen and the shredder will be operated no further south than 130 m from the northern site boundary</li> <li>• the two mobile screens in the segregated heavy waste processing and stockpiling area will not be operated simultaneously with the crusher/screen and shredder.</li> </ul>



**Table 6.1**      **Management measures**

Key issue	Management measure
Traffic	<ul style="list-style-type: none"> <li>• Site generated traffic will continue to be formally directed to continue to travel only via Steel River Boulevard and McIntosh Drive when travelling within the Steel River estate.</li> <li>• No heavy vehicle access to Werribi Street will continue during decommissioning activities.</li> <li>• Benedict Recycling will continue to maintain the access road between McIntosh Drive and the Recycling Facility site in a fit and proper condition and to a suitable standard, repairing it when required at no cost to Ausgrid. This will include repairing any minor areas of surface rutting using 50 mm hot mix asphalt.</li> <li>• Trucks will not be allowed to queue on the access road between McIntosh Drive and the Recycling Facility site.</li> </ul>
Water	<p>The following surface water management measures will be implemented:</p> <ul style="list-style-type: none"> <li>• surface water on site will continue to be managed in accordance with the OEMP and Surface Water Characterisation and mitigation plan</li> <li>• flocculation of stored water in the basins as necessary</li> <li>• only commercially available non-toxic flocculants will be used at the site</li> <li>• actions that will continue to be implemented to prevent impacts to water include</li> <li>• removal of sediment from the sedimentation basins when the sediment depth is greater than 200 mm</li> <li>• recycling of sediment if of appropriate quality or disposal to a facility approved to accept contaminated sediment</li> <li>• water in the sedimentation basins will be used for dust suppression to minimise the mains water required</li> <li>• groundwater will not be used.</li> </ul> <p>The following actions will be taken in respect to water discharge:</p> <ul style="list-style-type: none"> <li>• if water levels are between about 2 m and 3 m from the base of the sedimentation basin and meets water quality trigger values, water will be manually discharged from the final sedimentation basin using the outlet valve to maintain a freeboard in the final sedimentation basin</li> <li>• when the basin is discharging, daily samples of the discharging water will be collected from the final basin outlet pipe and will be analysed in accordance with the discharge monitoring program.</li> </ul>
Soils and contamination	<p>The following soil and contamination management measures will be implemented:</p> <ul style="list-style-type: none"> <li>• soil validation work would be conducted in accordance with the OEMP and Site Management Plan for Subsurface Disturbance Activities, McIntosh Drive Mayfield NSW (AECOM 2009)</li> <li>• site manager and all other parties involved in the site validation sampling will review the Site Management Plan for Subsurface Disturbance Activities, McIntosh Drive Mayfield NSW (AECOM 2009) prior to validation sampling</li> <li>• all subsurface sampling will be carried out during dry weather and in accordance with the OEMP and relevant sub plans</li> <li>• sediment control measures will be strategically placed around sampling locations</li> <li>• excavated material not backfilled immediately will be stockpiled on a sealed and bunded surface</li> <li>• 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</li> <li>• material used to backfill void after removal of the three-stage pit will be suitable for commercial/industrial land use</li> <li>• plant and equipment will be maintained to prevent hydrocarbon leaks</li> <li>• plant maintenance will only occur in sealed areas where spills, should they occur, will be contained and cleaned up immediately using a spill response kit</li> <li>• a spill response kit will be deployed next to maintenance activities</li> <li>• vehicles parked in the storage compounds will be parked on sealed areas</li> </ul>

**Table 6.1      Management measures**

Key issue	Management measure
	<ul style="list-style-type: none"> <li>• maintenance activities that may result in the loss of fluids will be conducted within a shed with a sealed floor and at least 5 m from the nearest open doorway.</li> </ul>
Visual	<ul style="list-style-type: none"> <li>• As part of the construction of the recycling facility, the following management measures were implemented to minimise potential visual impacts to the surrounding area: <ul style="list-style-type: none"> <li>i. Casuarina sp. were planted along the northern boundary and the northern section of the western boundary of the site to mitigate visual impacts from viewpoints to the north, north-east and west; and</li> <li>ii. rubbish from around the site boundaries was removed.</li> </ul> </li> <li>• Litter is removed from the site on a regular basis and a number of litter control measures are listed within the EMP.</li> <li>• Irrigation pipes have been installed and screening vegetation will be watered if required to maintain healthy growth.</li> <li>• Screening vegetation will be visually inspected and additional trees will be planted to ensure effective screening if required.</li> </ul>

## **Australia**

### **SYDNEY**

Level 10 201 Pacific Highway  
St Leonards NSW 2065  
T 02 9493 9500

### **NEWCASTLE**

Level 3 175 Scott Street  
Newcastle NSW 2300  
T 02 4907 4800

### **BRISBANE**

Level 1 87 Wickham Terrace  
Spring Hill QLD 4000  
T 07 3648 1200

### **CANBERRA**

Level 2 Suite 2.04  
15 London Circuit  
Canberra City ACT 2601

### **ADELAIDE**

Level 4 74 Pirie Street  
Adelaide SA 5000  
T 08 8232 2253

### **MELBOURNE**

Suite 8.03 Level 8 454 Collins  
Street  
Melbourne VIC 3000  
T 03 9993 1900

### **PERTH**

Suite 9.02 Level 9 109 St  
Georges Terrace  
Perth WA 6000

## **Canada**

### **TORONTO**

2345 Young Street Suite 300  
Toronto ON M4P 2E5

### **VANCOUVER**

60 W 6th Ave Suite 200  
Vancouver BC V5Y 1K1



[linkedin.com/company/emm-consulting-pty-limited](https://www.linkedin.com/company/emm-consulting-pty-limited)



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