OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

Penrith Waste and Recycling Facility

March 2021

Document Control				
Rev No	**Date**	**Revision Details**	**Author**	**Reviewer**
1	19/11/2020	Rev 1	EM	ED
2	26/2/2021	Rev 2	EM	IS
3	5/3/2021	Rev 3	EM	IS
4	26/3/2021	Rev 4 – DPIE comments	EM	IS

CONTENTS

1 INTRODUCTION

1.1 OVERVIEW

Benedict Recycling Pty Ltd (Benedict) is the operator of the Penrith waste recycling and transfer facility (the facility) at 46-48 Peachtree Road, Penrith (the site).

This document is an operational environmental management plan (OEMP) for the facility required by Condition C1 (Part C) of the Stage Significant Development (SSD) Consent (Ref: SSD 7733) (the Consent).

The Consent was originally approved on 15 May 2020 for construction and operation of a resource recovery facility to process up to 180,000 tonnes per annum (tpa) of general solid waste (non-putrescible).

The facility has been developed to provide a range of services to the demolition and construction industries, including:

- receival of waste;
- sorting of waste;
- recovery of recyclables;
- dispatch of recovered recyclables; and
- transfer and disposal of residuals.

This OEMP is the environmental management tool for the operation of the facility and includes detailed accompanying environmental management plans, as detailed in Section 1.4.

This OEMP is a live document. The management strategies and control measures detailed within this document and the accompanying environmental management plans will be reviewed and updated where necessary to reflect changes introduced by the facilities operational team, site specific outcomes, non-conformances and recommendations arising out of inspections, meetings, and audits.

1.2 LOCATION

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^2) 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. A site location plan (Figure 1.1) and a site layout plan (Figure 1.2) are provided below.

Figure 1.1 – Site location plan

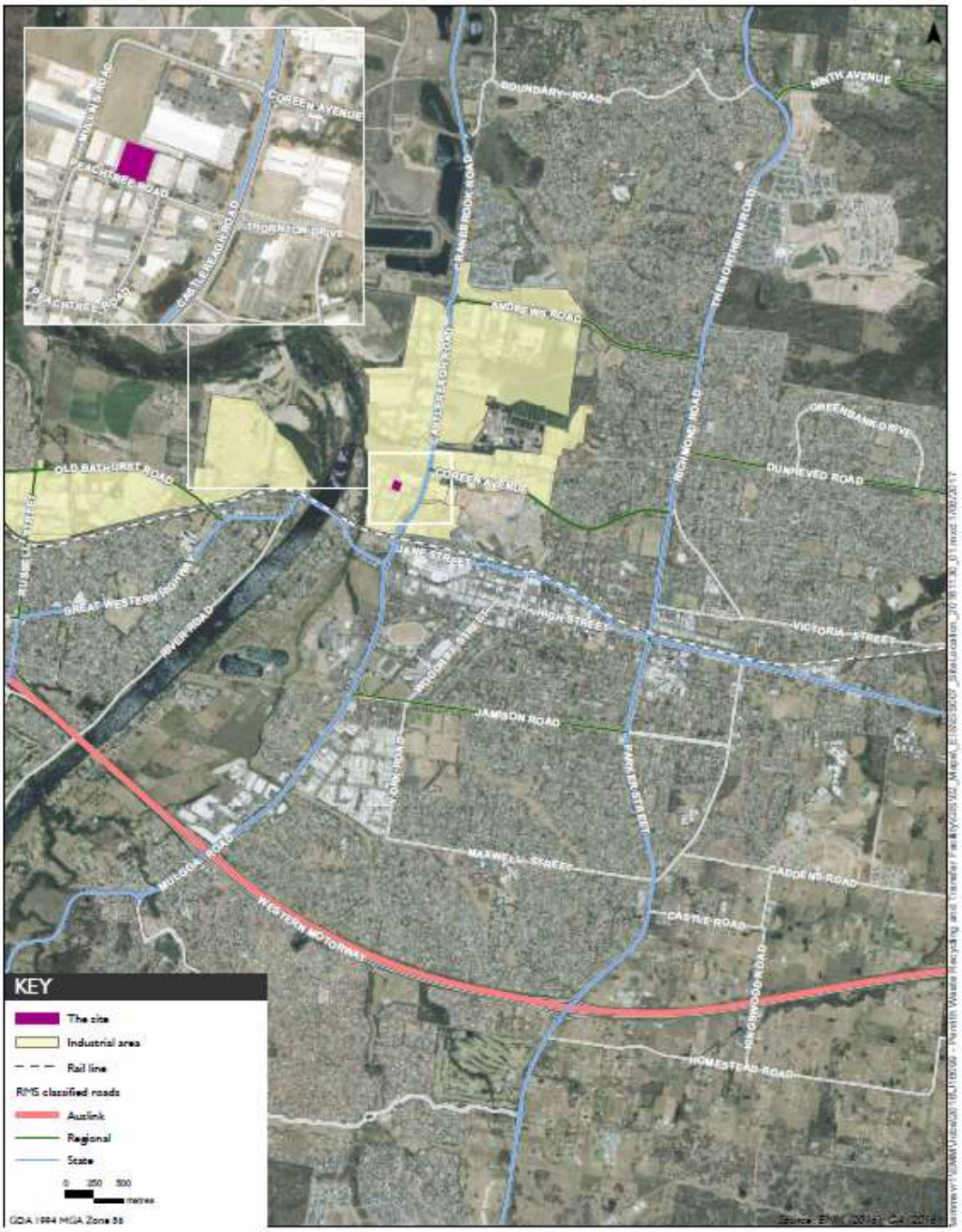
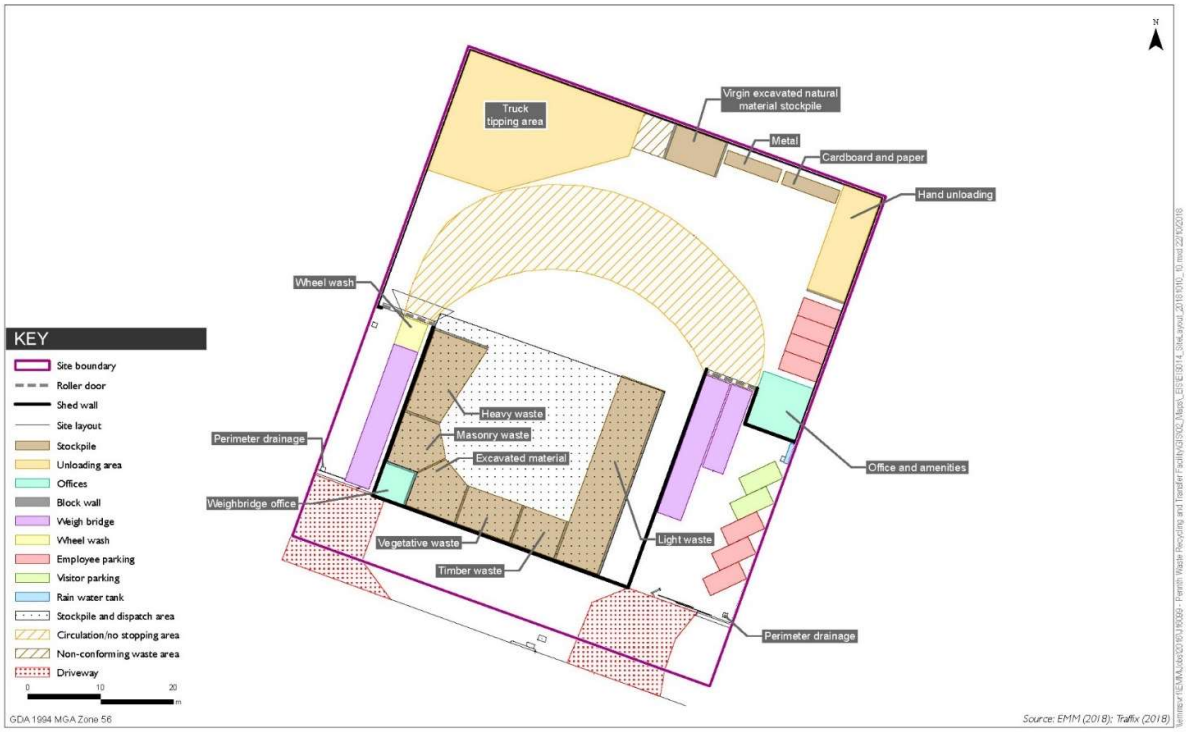


Figure 1.2 – Site layout plan



1.3 SCOPE OF THE OEMP

The purpose of this OEMP is to:

- provide an overview of potential environmental impacts of the facility during its operational phase;
- describe the management and mitigation measures that will be implemented by Benedict Recycling employees and contractors to minimise potential adverse impacts on the environment and sensitive receivers;
- 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 operations; in accordance with applicable legislative requirements, external approvals, and associated conditions of approval; and
- to comply with the requirements of the consent, particularly condition C4.

The operation of the facility is to be carried out in accordance with this OEMP as approved by the Secretary of the NSW Department of Planning, Industry and Environment (DPIE).

The OEMP is required under Part C of the Consent. The specific requirements of Condition C6 and the relevant sections where these requirements have been addressed in this OEMP are provided in Table 2.1 below.

Table 2.1 OEMP consent requirements

Condition	Description	Relevant section or other document
C6 (a)	As part of the OEMP required under condition C5 of this consent, the Applicant must include the following: (a) describe the role, responsibility, authority, and accountability of all key personnel involved in the environmental management of the development;	Section 5.1
C6 (b)	describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies.	 Section 6 Section 5.3 Section 5.3 Section 5.4 Section 5.5
C6 (c)	include the following environmental management plans: (i) Waste Management Plan (see condition B7); (ii) Operational Traffic Management Plan (see condition B14); (iii) Air Quality Management Plan (see condition B23);	 Appendix C Appendix D Appendix E

1.4 SUPPORTING ENVIRONMENTAL MANAGEMENT PLANS

As required by Condition C6(c) of the Consent, the following environmental management plans have been developed to accompany this OEMP:

- Waste Management and Waste Monitoring Plan (Appendix C);
- Air Quality Management Plan (Appendix E); and
- Operational Traffic Management Plan (Appendix F).

In accordance with Condition C1 of the Consent management plans must be prepared in accordance with the following:

C1: Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:

(a) detailed baseline data;

(b) details of:

  (i) the relevant statutory requirements (including any relevant approval, licence, or lease conditions);

  (ii) any relevant limits or performance measures and criteria; and

(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;

(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;

(d) a program to monitor and report on the:

(i) impacts and environmental performance of the development;

(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;

(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;

(f) a program to investigate and implement ways to improve the environmental performance of the development over time;

(g) a protocol for managing and reporting any:

(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);

(ii) complaint;

(iii) failure to comply with statutory requirements; and

(h) a protocol for periodic review of the plan.

2 STATUTORY CONSIDERATIONS

This chapter provides an overview of the environmental planning and statutory context for the operation of the facility.

2.1 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and the NSW Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) provide the assessment and approvals framework in NSW. They are administered by the NSW Department of Planning, Industry and Environment (DPIE).

The facility was classified as State Significant Development (SSD) under Clause 23(3) of Schedule 1 of the NSW *State Environmental Planning Policy (State and Regional Development 2011*) (SRD SEPP) as it involves the development for the purposes of a resource recycling facility which handles more than 100,000 Tonnes per annum (Tpa) of waste.

The Consent for the facility was approved by the Minister for Planning and Public Spaces on 15 May 2020.

Consent conditions relating to the operation of the facility and where they have been addressed in this OEMP are presented in the Compliance Register (Appendix A).

2.2 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1997 (POEO Act)

The NSW *Protection of the Environment Operations Act 1997* (POEO Act) relates to the management of pollution in NSW and is administered by the NSW Environment Protection Authority (EPA). Under Section 48 of the POEO Act, premise-based scheduled activities (as defined in Schedule 1 of the POEO Act) require an Environment Protection Licence (EPL). The operation of the facility is considered a premise based scheduled activity as a result of the following scheduled activities being carried out on site:

- handling more than 2,500 tonnes or 2,500 cubic metres of waste on site at any one time, or involves processing more than 12,000 tonnes of waste per year (Schedule 1 Clause 34 (Resource Recovery)); and
- receiving more than 12,000 tonnes of waste per annum from off site (Schedule 1 Clause 42 (Waste Storage)).

Benedict Recycling shall seek to obtain an EPL prior to operation. It is noted that under Section 89K of the EP&A Act, an EPL cannot be refused if it is necessary for carrying out State Significant Development that is authorised by a Development Consent.

2.3 WASTE AVOIDANCE AND RESOURCE RECOVERY ACT 2001

The NSW *Waste Avoidance and Resource Recovery Act 2001* (WARR Act) forms the basis of a framework for waste management in NSW. The WARR Act establishes a hierarchy to minimise the consumption of natural resources and final disposal of waste by encouraging waste avoidance, reuse, and recycling.

The WARR Act promotes integrated waste and resource management planning, programs, and service delivery on a state-wide basis to ensure that waste is managed to reduce environmental harm in accordance with the principles of ecologically sustainable development and the objectives of the POEO Act.

The facility will deliver an alternative waste management technology solution and beneficial environmental outcome compared to land filling. In accordance with the WARR, wastes will be managed against the waste hierarchy of avoidance, resource recovery and then disposal.

2.4 WORK HEALTH AND SAFETY ACT

The NSW *Work Health and Safety Act 2011* (WHS Act) provides for a balanced and nationally consistent framework to secure the health and safety of workers and workplaces.

In accordance with the WHS, the operation of the facility will ensure that workers and other persons will, as is reasonably practicable, be given the highest level of protection against harm to their health, safety and welfare from hazards and risks arising from work or from specified types of substances or plant.

2.5 GUIDELINES

The facility design and the operating procedures documented have due regard to relevant guidelines and codes of practice, including:

- the EPA's *Waste Classification Guidelines – Part 1: Classifying Waste;*
- *Australian Standard AS1940-2004 The Storage and Handling of Flammable and Combustible Liquids*;
- the EPA's *Guidelines on Resource Recovery Orders and Resource Recovery Exemptions;* and
- the EPA's developed exemption structure *The Recovered Aggregate Order 2014*.

2.6 ENVIRONMENTAL APPROVALS

The relevant environmental approvals in place for the facility are summarised in Table 2.2.

Table 2.2 Environmental approvals

Consent	Consent Authority	Description	Date of approval
SSD 7733	Minister for Planning and Public Spaces	State Significant Development Consent for the construction and operation of a resource recovery facility to receive up to 180,000 tonnes per annum of general solid waste (non-putrescible)	15 May 2020

3 WASTE AND RECYCLING FACILITY

Key features of the facility include:

- building, including site office and staff amenities;
- 3 x weighbridges;
- Interior dust management system (misting); and
- staff parking.

3.1 OVERVIEW OF OPERATIONS

Waste will be transported by waste contractors to the site entrance located on Peachtree Road. Vehicles will then proceed to a weighbridge complex to be weighed. The weighbridge complex will be fitted with CCTV, to monitor the front and rear of vehicles and their load characteristics.

Each load arriving at the facility will be inspected and classified prior to the material being deposited on site.

All waste accepted will be recorded on the facility's weighbridge system and a customer docket/receipt produced, as outlined in the Waste Management and Waste Monitoring Plan (Appendix C). The information recorded will include:

- the date;
- vehicle registration number; and
- the type and weight of waste being delivered.

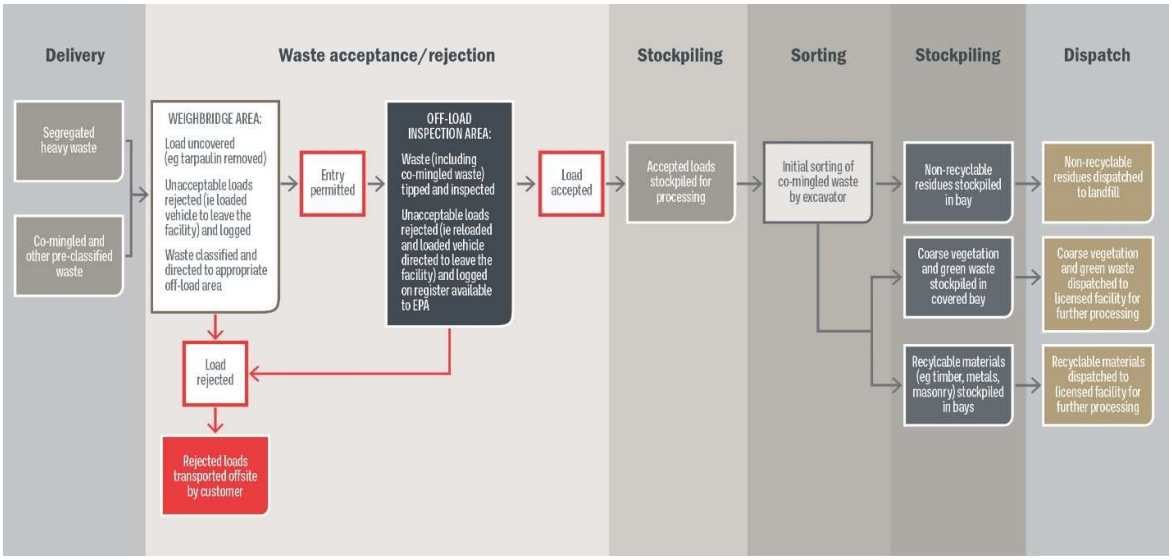
Incoming waste will be inspected by camera at the weighbridge (and again after being tipped and spread), see Section 4). Waste material that is unacceptable or specified prohibited from entering the site (see Appendix C) shall be refused entry and diverted to an appropriately licensed facility or reloaded if discovered after tipping off and spreading.

After leaving the weighbridge, each load will be directed to the appropriate storage area by the site staff. All waste will be is unloaded within the designated unloading area and be stored wholly within the designated waste stockpile areas in accordance with Condition A7 of the Consent. Wherever possible raw materials will be sorted at the source and directly tipped into segregated bays on-site.

Unsorted materials will be spread and sorted into the various categories and formed into segregated stockpiles.

A flowchart outlining the key steps in the waste recycling and transfer process is provided in Figure 3.1 below.

Figure 3.1 – Waste flowchart



By recycling wastes instead of sending them to landfill, this facility conserves the energy that would be typically used to extract and transport natural resources from distant sources.

3.2 BUILDING STRUCTURES

The following permanent structures are located on the site:

- main processing and storage shed;
- internal storage bays; and
- 3 x weighbridges.

The following temporary structures are located on the site:

- site and weighbridge office at site entrance/exit; and
- staff amenities (toilets and break room).

3.3 SEALED/HARDSTAND MATERIAL SORTING AND STORAGE AREA

The entire site, apart from the 10 m vegetated buffer at Peachtree Road, is sealed with hardstand and mostly covered by the shed structure. The floors of the sheds, bays and mounting areas for temporary structures are sealed with concrete for the handling, storage, loading and sorting of segregated waste materials and associated traffic movements.

3.4 SURFACE WATER SYSTEMS

“A revised water assessment [RTS November 2018 pp15-16] to address the amended design of the proposed facility has been prepared by Tooker and Associates (2018) at Appendix E. Key findings of the revised assessment are summarised below.

The material handling activities will be covered by a roof extending over approximately 3,000 m2 (68% of the overall site) of the site. The entry and exit driveway areas including the weighbridges along with five car parking spaces (three employee and two visitor) will be open areas without a roof.

The provision of a roof over most of the site will remove a significant quantity of potential pollutants in the runoff from the site that would require treatment. The incorporation of reuse of roof runoff in the amenities will also reduce the volume of runoff from the site.

Runoff from the external areas on the site will be collected in the existing drainage inlet pits and grates across the driveways and piped to the Peachtree Road kerb drainage system. The sumps in the drainage inlet pits in the open areas would be the first line of treatment for the site runoff. Coarse materials and sediment would be trapped in the sumps.

The drainage inlet pits will be maintained regularly by the removal of accumulated materials. The sediment sumps in the drainage inlet pits would be cleared monthly (or as required). The majority of the pollutant load in runoff is discharged in small storms up to the 3-month ARI storms and over 90% of the annual pollutant load is contained in frequent runoff up to the 3-month ARI storms (Appendix E). The provision of a roof over 68% of the site and reuse of roof runoff would reduce the runoff pollutant load by more than 55% compared to the existing site. The drainage system will readily cater for these storms and grates across the two driveways will collect the overland surface flows. The proposed drainage system will have an in-pipe capacity to carry 10-year ARI storm runoff.

Changes to the proposed drainage system upgrades to those proposed in the EIS include:

- capturing part of the main shed roof runoff into a rainwater tank for reuse in the amenities;
- using existing sediment traps/sumps to capture water from the uncovered weighbridge and parking areas; and
- gross pollutant traps (GPTs) are no longer proposed as there will be no operational activities in uncovered areas.

The proposed stormwater management concept plan and proposed new stormwater infrastructure are detailed in Figures 3 and 4 of the revised Water Management Plan (Appendix D).

The proposed enclosure of the facility and roof water reuse and will improve the runoff water quality and reduce the volume of runoff from the site. There will be no increase in impervious areas on the site for the proposed development. Given the internal control of contaminated runoff, and external diversion (ie enclosed facility), the site does not have any water quality monitoring requirements. If required, future requirements will be incorporated into the OEMP / Water Management Plan via standard revision processes.

The average annual runoff volume from the site under existing conditions has been estimated to be approximately 2,454 m^3.

In the developed scenario, the extent of runoff from the site will be reduced by capturing runoff and reusing it for use in the amenities. The estimated average annual reuse volume would be 30 m^3. This reuse will reduce the average annual runoff volume from the site by 1%.

The average annual supply of roof runoff from the main shed would be stored in a 4,000 L rainwater tank with a pumped supply line to the amenities. It is estimated that the roof runoff reuse could readily supply the demand for non-potable water use in the amenities."

A Water Management Plan has prepared by Tooker and Associates and has been included as Appendix D.

3.5 OPERATING TIMES

Consent Condition B25 provides the hours of operation for the facility as detailed in Table 3.1 below.

Table 3.1 Hours of work

Activity	Day	Time
Earthworks and construction	Monday – Friday Saturday	7am to 6pm 8am to 1pm
Waste deliveries and dispatch	Monday – Friday Saturday Sunday Public Holidays	6am to 10 pm 6 am to 6 pm 8 am to 4 pm Nil
Waste sorting	Monday – Friday Saturday Sunday and Public Holidays	6 am to 10 pm 7 am to 6 pm Nil

Condition B26 of the Consent outline the circumstances and requirements wherein operations may be conducted outside of the hours specified in Table 3.1 and summarised as:

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

Condition A9 of the Consent permits the Applicant to carry out activities including receipt, dispatch and sorting of waste, 24 hours, 7 days per week for a continuous two-week period for a maximum of six times per calendar year, subject to the following:

(a) the two-week periods cannot be consecutive, and must be at least two weeks apart;

(b) the two-week period includes weekdays, weekends, and public holidays;

(c) the licensee must notify the EPA and the Planning Secretary at least 24 hours prior to commencing each two-week period; and the licensee must notify the EPA and the Planning Secretary of any complaints received during the two-week period as soon as possible after the complaint is made.

3.6 OPERATIONAL PLANT AND EQUIPMENT

Condition B28 of the Consent requires that noise generated by operation of the facility does not exceed the noise limits in Table 3.1 below.

Table 3.1 Noise Limits

Location	Day L^{aeq}(15 min)	Evening/Morning Shoulder L^{aeq}(15 min)
All residential receivers	40	35

3.7 SITE STAFFING

The Site Supervisor and the Site Manager (or their delegated representatives) are to be present and on the site during operating hours of the facility. All site personal and their individual responsibilities are described in Section 5.1.

4 ENVIRONMENTAL MANAGEMENT OPERATIONAL PROCEDURES

Environmental goals and management procedures have been developed for all key environmental management issues.

Across all facets of environmental management operations at the facility, measures, and considerations to reduce energy consumption are to be implemented. Benedict strives to conserve energy by recycling waste, removing the need for natural resource extraction and transportation from distant sources. Other specific methods of energy conservation are to be implemented at the site, as described in the supporting management plans, and include techniques such as:

- waste to be recycled at the facility be sorted to prevent cross-contamination, in order to maintain recycling efficiency and reduce potential wastage;
- energy saving devices and equipment to be utilised where possible;
- vehicles and equipment not to be left idling and turned off when not in use;
- on-site vehicles and machinery to be regularly maintained and serviced to ensure maximum efficiency; and
- refuelling will be done by mobile fuel delivery trucks at days end.

New energy savings initiatives are collaborative and involve all employees, working from the bottom up to implement effective change.

Each environmental management issue and the related environmental goals and procedures are outlined in the following sections.

4.1 SITE MANAGEMENT

Environmental goals, activities, and operational procedures (OPs) in relation to site management are set out in the following table.

SITE MANAGEMENT	**OP 1**
Primary environmental goal	Clearly identified primary activities and controls that assure the environmentally responsible operation of the facility.
Related environmental goals	• Ensure compliance with the Consent and EPL. • Prevent unauthorised entry. • Assure the quality of operations. • Prevent the degradation of local amenity. • Provide adequate staffing and training. • Provide and maintain a safe work environment.

SITE MANAGEMENT		**OP 1**
Primary activities		Primary activities carried out on the site are to include: • receival and storage of construction and demolition waste; • retrieval of recyclable resources and their redistribution; • sorting, storage, and transfer of received waste; • monitoring of waste movement and maintenance of records of that movement; • control of site aspects that may affect the environment in accordance with this OEMP; and • management of the facility to ensure the safety of public, the operators and the environment.
PROCEDURES		
OP 1.1	Traffic control	Vehicular and pedestrian traffic is to be directed to ensure the safety of all staff. This is to be noted as a condition of entry on the gate signage. Traffic control signage is to be erected as directed by the Site Supervisor. The signage is to include: • conditions of entry; • hours of operation; • acceptable and prohibited wastes signage; • speed restriction signage; • directional signage; and • material drop off points signage.
OP 1.2	Public and staff safety	• The safety of the public and staff is a prime consideration in all aspects of the facility. • Operational plant and equipment are to be operated in such a way as to minimise risks to persons delivering, sorting or loading recovered materials and waste for transfer. • All information and directional signs and their locations are to be subject to approval of the Site Supervisor.
OP 1.3	Scavenging	• There are to be no scavenging arrangements. • All resource recovery is to be undertaken by the facility.
OP 1.4	Vehicle washing	• Waste delivery vehicles exiting the facility are to be subject to wheel washing when exiting the site.
OP 1.5	Monitoring	• Monitoring of day-to-day operations is to be undertaken by the Site Supervisor. • Overall monitoring of the site is to be undertaken by the Site Manager.
OP 1.6	Facility design management and mitigation measures	To minimise dust and noise emissions: • materials (waste, products, and residues) are to be contained wholly within the shed in marked bays; • wastes are to be sorted in the shed (see Figure 1.2) and are not to be processed outside of the shed area; and • green waste is to only be stockpiled in the shed.

4.2 WASTE ACCEPTANCE, PROCESSING AND TRANSFER

A Waste Management and Monitoring Plan (WMP) has been prepared and is provided as Appendix C. Key elements of this plan have informed the environmental goals and procedures in the table below for waste acceptance, processing, storage, and transfer.

WASTE ACCEPTANCE, PROCESSING AND TRANSFER		**OP 2**
Primary environmental goal		The receival, sorting, and transfer of waste and recyclables are to be managed and monitored to ensure the environmentally responsible operation of the facility.
Related environmental goals		• Ensure compliance with the Consent and EPL. • Conduct operations in accordance with the Waste Management and Monitoring Plan (refer Appendix C). • Assure the quality of incoming waste by identifying and recording the wastes and recyclables received by the facility as not hazardous. • Maximise recycling and reuse. • Provide adequate staffing and training. • Provide and maintain a safe work environment.
Compliance		Key Consent requirements relevant to waste acceptance, sorting and processing are provided below. • The facility is not to receive or process on site more than 180,000 tonnes per year of general solid waste (non-putrescible). • The facility must not store more than 1,600 tonnes of general solid waste (non-putrescible) at any one time. • All waste materials removed from the site is to be directed to a waste management facility or premises lawfully permitted to accept the materials. • Waste generated outside the site is not to be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by the EPL. • The amount of waste received at the site is to be recorded on a daily basis. • All sampling and waste classification data is to be retained for the life of the facility. • No biochar production or storage is to be allowed on site. • Loads predominately containing glass are not permitted to be crushed at the site. • All liquid and non-liquid wastes are to be taken off site in accordance with the EPA's Waste Classification Guidelines Part 1: Classifying Waste, November 2014. • All waste is to be stored, loaded, and unloaded, wholly within the shed building.
PROCEDURES		
OP 2.1	Control, monitoring and recording of incoming waste	The facilities' Site Supervisor is to monitor the receival of waste to ensure it is inspected, not classified as hazardous waste and recorded. The only type of waste permitted to be received or processed at the site is waste classified as general solid waste (non-putrescible).

WASTE ACCEPTANCE, PROCESSING AND TRANSFER		OP 2
OP 2.2	Inspection of waste received	Each load presented at the facility is to be inspected prior to the material being deposited on site.
OP 2.3	Prohibited and unacceptable waste	Waste material that is unacceptable or specified prohibited from entering the site (see Appendix C) is to be refused entry and diverted to an appropriately licensed facility.
OP 2.4	Recording of waste	All waste accepted at the facility is to be recorded on the facilities' weighbridge system and a customer docket/receipt produced (see Appendix C). All weighbridge records, as required by the NSW POEO (Waste) Regulation, are to be retained for the life of the facility. The weighbridge records are to be made immediately available on request by the Secretary and/or the EPA.
OP 2.5	Storage of waste	• Each load presented at the facility is to be directed to the appropriate area by the Site Supervisor. • Wherever possible, raw materials are to be sorted at the source and directed into segregated stockpiles on-site. • Unsorted materials are to be spread on the ground, sorted into the various categories, and formed into segregated stockpiles. • All sampling and waste classification data are to be retained for the life of the facility in accordance with the requirements of the EPA. • All waste unloaded at the public hand unloading area is to be unloaded and stockpiled underneath the public unloading awning or within the main processing building. • All waste is to be stored wholly within the designated waste stockpile areas and loaded and unloaded within the designated loading and unloading areas.
OP 2.6	Processing of waste	The sorted waste materials may be subject to further off-site processing depending on its category and presentation. No processing will occur onsite.
OP.2.7	Records	Sampling and waste classification dates are to be kept for the life of the facility in accordance with EPA requirements.
OP 2.8	Monitoring	The Waste Management and Monitoring Plan contained in Appendix C details the Waste Monitoring Program that is to be implemented during operations.

4.3 HAZARDOUS WASTE PREVENTION AND RESPONSE

Management of hazardous waste is detailed in the Waste Management and Monitoring Plan provided in Appendix C. Key elements of this plan have informed the environmental goals and procedures in relation to hazardous waste and response provided in the following table.

HAZARDOUS WASTE PREVENTION AND RESPONSE		**OP 3**
Primary environmental goal		Ensure no hazardous waste is present at the facility.
Related environmental goals		• Ensure compliance with the Consent and EPL. • Assure the quality of operations. • Prevent the degradation of local amenity. • Provide adequate staffing and training. • Provide and maintain a safe work environment.
Compliance		Key Consent conditions relevant to hazardous waste prevention are set out below: • Auditable procedures are to be implemented to handle and dispose of hazardous waste materials (asbestos, sharps, and chemical/biological materials. • The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department's *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33* at all times. • • Details of the quantity, type and source of wastes received on the site are to be provided to the EPA and the Secretary when requested. • Staff are to receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos. • All chemicals, fuels and oils used on-site must be stored in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Manual* (Department of Environment and Climate Change, 2007).
PROCEDURES		
OP 3.1	Hazardous waste management	• Incoming waste is to be monitored and any hazardous waste detected is diverted in accordance with this procedure. • Hazardous waste found on site it to be reported and managed as an environmental or safety incident.
OP 3.2	Waste acceptance	• Gates are to be locked and fences secured on days when the facility is not open to the public. • Each load presenting at the facility is to be inspected for hazardous waste prior to the material being accepted on to the site. • Waste material specifically prohibited from entering the site (see Appendix C) is to be refused entry and diverted where possible to the appropriate facility or alternatively directed to contact the EPA for advice (ph. 02 9995 5000).

HAZARDOUS WASTE PREVENTION AND RESPONSE		OP 3
		• Waste that is refused entry is to be recorded in a register. The information recorded is to include: (a) date; (b) carrier organisation; (c) registration number of the vehicle; and (d) type of waste.
OP 3.3	Identification of prohibited waste	• Incoming waste will be inspected in two stages: 1. a preliminary inspection of the incoming waste on the vehicle at the weighbridge; and 2. an inspection of the incoming waste after it is tipped off but before it is added to the appropriate feed stockpile. The customer will be required to wait until the waste has passed the inspection. • Incoming waste loads that are suspected to contain contaminants (ie loads that contain wastes that are not listed the Waste Management and Monitoring Plan (Appendix C)). • Details of any non-conforming waste loads are to be captured on the 'Notification of Non-Conforming Waste Form' (refer Attachment D of the Waste Management and Monitoring Plan (Appendix C)) which is to be sent to the customer and filed on site. • A log of all non-conforming loads is to be maintained in a central register that is available for EPA inspection.
OP 3.4	Management of prohibited wastes	• The EPA is to be advised of any incident that poses a threat to the environment as soon as practical after the incident occurs. • The incident is to be reported by telephoning: - EPA Sydney office: 02 9995 5000; or - EPA Pollution Hotline: 131 555. • Wastes identified as hazardous in the Waste Management and Monitoring Plan (Appendix C) are to be managed in accordance with "The Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Waste." • Arrangements are to be made for the removal of the waste to an appropriately licensed facility.
OP 3.5	Incident reports	Any incident relating to the identification of a prohibited waste on the site is to be reported in accordance with "OP 16- Incident Reporting" (refer Section 5.4).
OP 3.6	Hydrocarbon storage	The following management measures will be implemented to minimise impacts associated with a diesel spill: • diesel will be supplied to mobile plant by an appropriately licensed and qualified on-site refuelling contractor using a mini-tanker; • refuelling and emergency spill response activities will be detailed; and • there will be a diesel spill kit stored within the shed.

4.4 WASTE MANAGEMENT AND MONITORING

Environmental goals, activities, and procedures in relation to product control, monitoring and management are set out in the following table.

WASTE MANAGEMENT AND MONITORING		**OP 4**
Primary environmental goal		Recovered materials sorted by the facility is not to adversely affect the environment.
Related environmental goals		• Ensure compliance with the Consent and EPL. • Assure the quality of all recycled materials. • Assure the quality of operations. • Provide adequate staffing and training.
PROCEDURES		
OP 4.1	Incoming waste	Waste receival, management and prohibited material exclusion is to be in accordance with OP 2, OP 3 and the Waste Management and Monitoring Plan (Appendix C).
OP 4.2	Waste selection	The following wastes are included for acceptance & sorting: • brick and concrete; • tiles and ceramics; • asphalt (as engineered material but not containing coal tar); • natural rock; • vegetation and wood; • glass (as co-mingled with other waste); • rubber; • sand, soil, clay excluding contaminated soil; • excavated natural material (ENM); • virgin excavated natural material (VENM); and • commercial and industrial.

4.5 WATER MANAGEMENT

The environmental goals and procedures for surface water management are set out in the following table.

WATER MANAGEMENT	**OP 5**
Primary environmental goal	Stormwater gathered by the facility is not to adversely affect the site or its surrounds.
Related environmental goals	• Ensure compliance with the consent and EPL. • Assure the quality of operations. • Prevent the degradation of local amenity. • Provide adequate staffing and training.
Compliance	Key consent conditions relevant to surface water management: • The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.

WATER MANAGEMENT		OP 5
PROCEDURES		
OP 5.1	Stormwater Management System	Prior to the commencement of operation, Benedict Industries will design, install, and operate a stormwater management system for the development. The system will: (a) be designed by a suitably qualified and experienced person(s); (b) be designed in accordance with the management and mitigation measures identified in consent condition A2; (c) be generally in accordance with the conceptual design in the EIS; (d) be in accordance with applicable Australian Standards; and (e) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and *Managing Urban Stormwater: Council Handbook* (EPA, 1997) guidelines.
OP 5.2	Water management	The following measures will be implemented to minimise water impacts: • the shed's guttering system will be inspected on an annual basis to remove accumulated debris; • the rainwater tank will be inspected on a six-monthly basis for structural integrity; • drainage inlet pit sediment traps will be inspected on a monthly basis and cleared as necessary; • the drainage system will be inspected on a six-monthly basis and cleared to remove accumulated materials; • driveways will be swept and cleaned daily; and • groundwater will not be used.

4.6 TRAFFIC MANAGEMENT

The Operational Traffic Management Plan (OTMP), required under the Consent Condition B20, is provided in Appendix F. Key compliance considerations have informed the environmental goals and procedures for traffic management as set out in the table below.

TRAFFIC MANAGEMENT	OP 6
Primary environmental goal	Traffic is controlled to minimise any adverse effects caused by traffic entering, circulating and leaving the facility.
Related Environmental goals	• Ensure compliance with the Consent. • Prevent degradation of local amenity. • Provide adequate staffing and training. • Provide and maintain a safe work environment. • Ensure adherence to the most recent version of the OTPMP approved by DPIE.
Compliance	Key Consent conditions in relation to traffic management are provided below. • Five parking spaces for staff and for visitors are provided on site and no parking is permitted elsewhere on the site except within the designated car spot.

TRAFFIC MANAGEMENT		**OP 6**
		• Internal roads, driveways and parking are to be developed and maintained in accordance with the latest version of AS 2890.1 and AS 2890.2. • All vehicles are to enter the site in a forward direction. • All trucks entering or leaving the site with loads are to have their loads covered and no dirt is to be tracked onto the public road network. • A wheel wash is to be used if required to clean truck tyres to prevent mud or sediment being carried to and deposited on the access road (and public roads).
PROCEDURES		
OP 6.1	Traffic management	Traffic management measures for the following are to be carried out in accordance with the specific requirements in the OTMP: • detail heavy vehicle routes; • internal traffic management; • driver code of conduct; and • traffic control plan detailing control of truck movements and provisions to require traffic controllers.
OP 6.2	Traffic control signage	Traffic control signage as described in the OTMP is to be provided for: • hours of operation; • 'conditions of entry', including the Site Operators authority to direct traffic and pedestrian movement within the facility; • speed instruction signage (10km/h max.); and • way finding, directional signage and line markings.
OP 6.3	Monitoring and mitigation	• Signs are to be erected at the facility regarding drivers' legal obligation to ensure that waste is covered during transport. • Vehicles dispatching products or residue are to be covered prior to leaving the site.
OP 6.4	Recording	• Any traffic incidents with actual or potential significant offsite impacts are to be reported to DPIE within 7 days. • To assist in the orderly resolution of complaints, a register iteming all reported incidents relating to complaints in regard to heavy vehicle driver conduct external to the facility site is to be kept. The incident register is to include (where possible): i. date; ii. location/s; iii. the driver/heavy vehicle details; iv. contact details of the person lodging the complaint; v. what/when actions were taken to resolve the issue; and vi. the reply to the person/organisation that made the complaint. • Records of traffic complaints are to be kept in the facilities' record system for at least four years.

4.7 AIR QUALITY

The Air Quality Management Plan (AQMP), required under Condition **B23** of the Consent, is provided in Appendix E. Key elements of this plan have informed the environmental goals and procedures provided in the table below.

Air Quality	**OP 7**
Primary environmental goal	Operation of the facility is not to result in adverse air quality impacts to the general environment or nearby sensitive receivers.
Related environmental goals	• Ensure compliance with the Consent. • Ensure adherence to the AQMP (Appendix E). • Assure the quality of operations. • Provide adequate staffing and training. • Provide and maintain a safe work environment.
Compliance	Key Consent conditions relevant to air quality management of the facility are as follows: • The AQMP is to be implemented for the duration of and during operation of the facility. • All reasonable steps are to be taken to minimise dust generated during all works authorised by this Consent. • All on-site roads and car parking areas are to be sealed with concrete or asphalt. • All operating, storage, unloading and loading areas are to be sealed with concrete, asphalt, or other impervious barrier(s) of the same or greater quality. • Dust suppressants are to be used to prevent particulate emissions from stockpiles and other dust generating sources. • Trucks and vehicles entering and leaving the site that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading. • All operations and activities occurring at the facility are to be carried out in a manner that minimises the emissions of air pollutants from the site. • Trucks associated with the facility are not to track dirt onto the public road network. • Public roads used by these trucks are to be kept clean. • The facility must not cause or permit the emission of any offensive odour.

Air Quality		**OP 7**
PROCEDURES		
OP 7.1	Air quality management and mitigation	Key management and mitigation measures from the AQMP (Appendix E) are to be implemented as set out below. • Water sprays are to be used at stockpiles and during material handling as necessary. • Misting for dust suppression will operate at the shed's vehicle ingress and egress points. • Misting for dust suppression will operate at the southern stockpile area. • A wheel wash is to be used if required to clean truck tyres to prevent mud or sediment being carried to and deposited on the access road (and public roads). • On site equipment is to be regularly maintained and served to maximise fuel efficiency. • Energy efficiency is to be progressively reviewed and implemented throughout the life of the facility.
OP 7.2	Monitoring	Dust generation is to be monitored by: • monitoring requirements specified in the EPL; • regular site monitoring by the Site Supervisor; • dust complaints received; and • weekly inspection of wheel wash. Any dust complaints received are to be referred to the Site Supervisor and to the Site Manager.
OP 7.3	Recording	Any complaint received by Benedict Recycling regarding dust impacts from the facility are to be acted on within 24-hours in the following manner: • details of the complaint (date, time, specifics, complainants contact details) to be noted; • activities occurring during the complaint period to be investigated; • findings of operations during the complaint period to be logged in the complaints register; • relevant management practices to be reviewed as necessary; and • respond to complainant with findings of the review. Records of air quality complaints are to be kept in the facilities' record system for at least four years.
OP 7.4	Odour	Odour will be managed via the following controls: • garden waste will be dispatched to another facility licensed to accept it, as soon as there is enough to fill a dispatch vehicle, or if the material starts to compost (whichever is sooner); and • given the operational area of the site is enclosed, vegetative waste will not be exposed to direct sunlight. As such, it is not expected that any material will be on site long enough for composting to occur. However, should vegetative waste be present, daily monitoring will be undertaken (including ranged infrared testing, visual checks, odour checks) as outlined in Section 4.1.12iic of the Response to Submissions Report (2018).

Air Quality		**OP 7**
OP 7.5	Greenhouse Gases	The following management measures will be implemented to prevent/minimise greenhouse gas emissions associated with the site: • on-site equipment will be regularly maintained and serviced to maximise fuel efficiency; • vehicle kilometres travelled on site will be minimised; and • energy efficiency will be progressively reviewed and implemented throughout the life of the facility.

4.8 NOISE

Noise limits required under Condition **B28** of the Consent are presented in Table 4.1. Conditions concerning approved hours of operation are detailed in Section 3.5

Table 4.1 Noise Criteria dB(A)

Location	**Day** LAeq (15 minute)	**Evening** LAeq (15 minute)	**Shoulder** LAeq (15 minute)
All residential receivers	40	35	35

Note: Noise generated by the facility is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy (EPA, 1999) (as may be updated or replaced from time to time). Refer to the plan in Appendix 2 for the location of residential sensitive receivers.

NOISE AND VIBRATION CONTROL		**OP 8**
Primary environmental goal		Noise generated by the facility is not to adversely affect the site or its surrounds.
Related environmental goals		• Ensure compliance with the Consent and the EPL. • Assure the quality of all operations. • Prevent the degradation of local amenity. • Provide adequate staffing and training. • Provide and maintain a safe working environment.
Compliance		Key consent conditions relevant to noise management on the site are set out below. • Operation of the facility is to comply with the defined hours of work. • Noise generated by operation of the facility is not to exceed the defined noise criteria (refer Table 4.1).
PROCEDURES		
OP 8.1	Noise management and mitigation	The following management measures will be introduced to minimise noise impacts: • material sorting will not take place on public holidays, Sundays or before 7 am on Saturdays; • noisy activities and adoption of improvement techniques will be identified; • the movement of materials and plant and unnecessary metal-on-metal contact will be minimised; • material drop heights and the dragging of materials will be minimised; • quieter plant and equipment will be chosen based on the optimal power and size to perform the required tasks most efficiently; • plant and equipment will be operated in the quietest and most efficient manner; • plant and equipment will be regularly inspected and maintained to minimise noise and vibration, and to ensure that all noise and vibration reduction devices are operating efficiently; • noise-related complaints will be handled promptly; and • a complaints register will be maintained.

4.9 PEST, VERMIN AND NOXIOUS WEED MANAGMENT

Environmental goals, compliance, and procedures in relation to pest, vermin and noxious weed management are set out in the following table.

PEST AND VERMIN CONTROL		**OP 9**
Primary environmental goal		Pests, vermin, and noxious weeds are not attracted or spread by the facility and do not to adversely affect the site or its surrounds.
Related environmental goals		• Ensure compliance with the Consent and the EPL. • Assure the quality of all operations. • Provide adequate staffing and training. • Provide and maintain a safe working environment.
Compliance with Condition **B10**		(a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and (b) inspect on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area.
PROCEDURES		
OP 9.1	Pest and vermin management	Pest, vermin, and noxious weed management is to be controlled by: • removal of residual waste in a timely fashion; • regular cleaning of the waste receival, stockpiling and processing areas; • litter control and removal by fencing and by patrolling fencing lines and removing litter for disposal; • surface drainage minimising ponding on the site; and • populations being controlled as appropriate.
OP 9.2	Monitoring	The presence of pest, vermin and noxious weed are to be monitored by visual inspections on a weekly basis.
OP 9.3	Recording	Records of eradication programs undertaken are to be kept in the facilities' record system for at least four years.

4.10 LITTER CONTROL

Environmental goals and procedures in relation to litter control are set out in the following table.

LITTER CONTROL		**OP 10**
Primary environmental goal		Litter generated by the facility is not to adversely affect the site or its surrounds.
Related environmental goals		• Ensure compliance with the Consent and EPL. • Assure the quality of all operations. • Prevent unauthorised site entry.
PROCEDURES		
OP **10**.1	Litter control	The site is monitored for litter and control activities implemented as required.

LITTER CONTROL		OP 10
OP **10**.2	Litter management	Litter is to be controlled by: • removing processed material and residual waste regularly; • patrolling litter fences and fence lines on a weekly basis; and • visually inspecting adjacent properties for litter and by organising its collection and disposal.
OP **10**.3	Monitoring	Litter is to be monitored by: • regular site monitoring by the Site Supervisor and Site Operator; and • through any litter complaints received.
OP **10**.4	Recording	Records of litter complaints are to be kept in the facilities' record system for at least four years.

4.11 SITE SECURITY

Environmental goals and procedures in relation to the security of the site are set out in the following table.

SITE SECURITY		OP 11
Primary environmental goal		Prevent unauthorised entry to the facility.
Related environmental goals		• Ensure compliance with the Consent. • Assure the quality of all incoming waste. • Prevent the degradation of local amenity. • Provide and maintain a safe working environment.
Compliance		• The security gates are to be locked whenever the site is not in operation or is unattended.
PROCEDURES		
OP 11.1	Site security management	Access to the facility and its operations is managed to ensure there is no unauthorised entry or dumping at the facility or in its vicinity.
OP 11.2	Site security	Site security is to be maintained on the site by ensuring: • all gates and facilities are maintained and locked when the facility is not open; and • communication systems are available for staff working on site.

4.12 FIRE SAFETY

Environmental goals and procedures in relation to fire safety management of the site are set out in the following table.

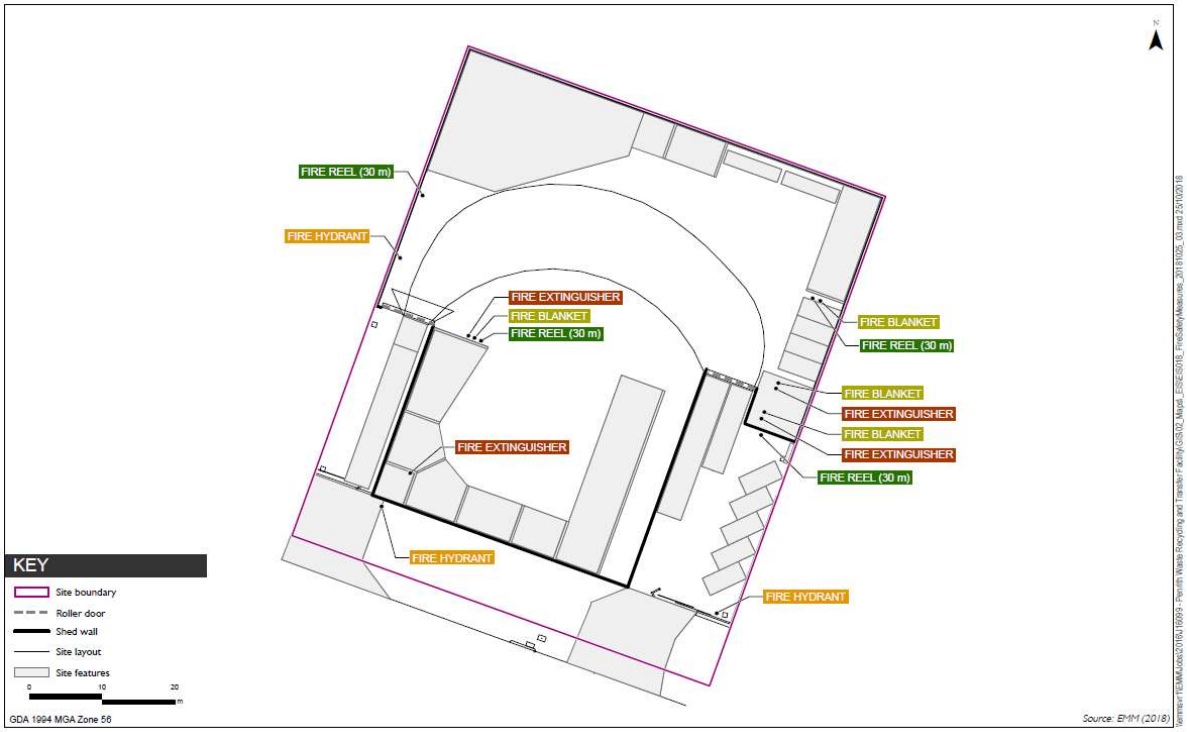
FIRE MANAGEMENT	OP 12
Primary environmental goal	Minimising the risk of fire damage to the facility and its surrounds.
Related environmental goals	• Ensure compliance with the Consent. • Assure the quality of operations. • Prevent unauthorised entry. • Prevent degradation of local amenity. • Ensure adequate firefighting capacity.

FIRE MANAGEMENT	**OP 12**
Compliance with Condition **B36**	Key Consent conditions relevant to fire management on the site are provided below. • Prior to the commencement of construction (excluding site preparation works), the fire and life safety design of the facility, 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 stockpile storage is to be limited in size to 5 m high (Condition **A8**) and the maximum storage of waste at any one time is 1,600 tonnes (Condition **A7**). • Any fire-water runoff is to be contained in the shed using 0.1m perimeter bunding.

FIRE MANAGEMENT		**OP 12**
PROCEDURES		
OP 12.1	Fire management	The facility is to be assessed for fire risk levels and preventative/minimisation activities are to be implemented as required during construction.
OP 12.2	Fire prevention and mitigation	The potential for fires at the facility and as a result of is to be minimised by: • maintaining lockable gates; • ensuring access gates are locked at all times outside opening hours; • maintaining boundary fences; • accepting only permitted wastes; • regularly removing residual waste from the site; • maintaining machinery in good working order to minimise the risk of sparks; • maintaining firefighting equipment; • consulting with the NSW Fire Brigade; • maintaining the quantities of dangerous goods stored and handled at the site below the threshold quantities listed in the Department of Planning's *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times*; • locating and installing services (including water, gas, and electricity) in a manner that reduces potential fire hazards; • separating flammable stockpiles with block walls; • providing water for firefighting from existing fire hydrants in Peachtree Road; • providing fire hydrants on site capable of providing 50 L/s of firewater and providing extinguishers and fire hydrants at the office building; • ensuring above ground pipes external to structure are metal including and up to taps; and • Provide 4 x fire extinguishers, fire blankets, fire hose reels and smoke alarms.
OP 12.3	Firefighting	Firefighting is to be undertaken in association with the NSW Fire Brigade (contact**:** Emergency 000 and ask for Fire Brigade). Small fires are to be extinguished utilising the fire hoses and sprinkler systems provided on site in the first instance.

FIRE MANAGEMENT		OP 12
OP 12.4	Recording	Following containment of any fire the Site Manager in conjunction with the Site Supervisor is responsible for preparing an Incident Report Form as per the procedure contained in OP13 (Section 5.4). This report is to be recorded on the facilities' records system and is to include: • time and date of the start of the fire; • cause of the fire (if known); • time and date the fire was extinguished; • location of the fire; • weather conditions at the time of the fire; • details and observation of the directions and dispersion rate of the smoke from the fire; • details of any complaints from the public regarding the smoke; and • actions that could be taken to prevent recurrence.

Figure 4.1 – Fire Safety Measures



5 IMPLEMENTATION OF THE OEMP

5.1 ROLES AND RESPONSIBILITIES

5.1.1 SITE MANAGER

The facilities' Site Manager is responsible for:

- ensuring the facility complies with all relevant licences, approvals, and applicable legislation;
- approving and implementing the OEMP;
- allocating project resources to managing environmental issues on site;
- taking action to resolve any non-compliances;
- ensuring site personnel receive appropriate environmental awareness training and supporting site personnel to comply with relevant Consent and EPL conditions;
- reviewing the OEMP and accompanying environmental management plans; and
- reporting to senior management on the performance of the OEMP, environmental incidents/non compliances and improvement opportunities.

5.1.2 SITE SUPERVISOR

The facilities' Site Supervisor is responsible for:

- ensuring that the site complies with relevant licences, acts and regulations and notify the Site Manager of any contraventions;
- undertaking and/or co-ordinating environmental monitoring requirements specified in the Consent and the EPL; and
- delivering environmental awareness training.

5.1.3 ALL PERSONNEL

All site personnel are responsible for the following:

- complying with relevant Acts, Regulations and Standards;
- complying with Benedict policies and procedures;
- complying with management/supervisory directions;
- promptly reporting any non-conformances and/or breaches to management; and
- participating in induction and training as directed.

5.2 TRAINING

All of the facility's employees and subcontractors (as necessary) are to receive environmental training, to ensure they are of aware of their responsibilities and have the necessary knowledge and skills to carry out their work.

Environmental requirements are to be explained to employees as part of Benedict's corporate and site inductions. Training is to be ongoing as required. All inductions and ongoing training are to be recorded.

Employees and contractors are to receive training in the following areas:

- the requirements of the OEMP;
- EPL and Consent condition compliance;
- significant environmental risks, impacts and controls;
- emergency/pollution incident response management plan; and
- understanding their legal obligations.

Environmental goals and procedures in relation to staff training requirements are set out in the following table.

STAFF TRAINING REQUIREMENTS		**OP 12**
Primary environmental goals		• Staff are to be adequately trained to ensure the protection of the environment. • Staff and contractors (and their sub-contractors) are to be made aware of and instructed to comply with the conditions of the Consent and the EPL relevant to activities they carry out on site.
Related environmental goals		• Assure the quality of all operations. • Provide adequate staffing and training. • Provide and maintain a safe working environment.
PROCEDURES		
OP 12.1	Training	• All staff are to undertake training to enable them to carry out their assigned duties competently and safely; • all staff employed at the facility are to be trained in the requirements and operational procedures of the OEMP; • operators of equipment must be trained and skilled at undertaking the task allocated to them; and • staff must be capable of identifying wastes that are not permitted to be disposed of at the facility. All employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.
OP 12.2	Monitoring	Staff competency is to be monitored though: • site audits; • annual staff competency assessments; • customer complaints received; and • incident reports.
OP 12.3	Responsibility	The Site Operators are responsible for: • carrying out tasks in a safe manner and in accordance with the procedures in which he/she have been trained.

STAFF TRAINING REQUIREMENTS		OP 12
		The Site Supervisor is responsible for: • carrying out tasks in a safe manner and in accordance with the procedures in which he/she has been trained. The Site Manager is responsible for: • implementing this procedure; • arranging for staff competency assessments and training to ensure that all staff working at the facility are able to perform their duties in a safe and competent manner; and • ensuring that the nominated officers have been trained in the requirements of this procedure.

5.3 ANNUAL REVIEW

In accordance with Condition **C15**, within 3 months after the first year of commencement of operation, and in the same month each subsequent year (or such timing as may be agreed by the Planning Secretary), the Applicant must submit a report to the Planning Secretary reviewing the environmental performance of the facility to the satisfaction of the Planning Secretary. This review must:

(a) describe the facility that was carried out in the previous year, and the facility that is proposed to be carried out in the current year;

(b) include a comprehensive review of the monitoring results and complaints records from the previous year, including a comparison of these against the:

i. relevant statutory requirements, limits, or performance measures/criteria;

ii. requirements of any plan or program required under this Consent; and

iii. monitoring results of previous years; and

iv. the relevant predictions in the EIS, Response to Submissions.

(c) identify any non-compliances and any incidents which occurred over the previous year, and describe what actions were (or are being) taken to rectify the non- or incident and avoid recurrence;

(d) identify any trends in the monitoring data over the life of the facility;

(e) identify any discrepancies between the predicted and actual impacts of the facility, and analyse the potential cause of any significant discrepancies; and

(f) describe what measures are to be implemented over the next year to improve the environmental performance of the facility.

5.4 INDEPENDENT ENVIRONMENTAL AUDIT

C16. Within one year of the commencement of operation, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the facility. Audits must:

(a) be led and conducted by a suitably qualified, experienced, and independent team of experts;

(b) be carried out in consultation with the relevant agencies;

(c) assess the environmental performance of the facility and assess whether it is complying with the requirements in this consent, and any strategy, plan or program required under this consent;

(d) review the adequacy of any approved strategy, plan or program required under this consent; and

(e) recommend measures or actions to improve the environmental performance of the facility, and any strategy, plan or program required under this consent.

C17. Within three months of commissioning an Independent Environmental Audit, or within another timeframe agreed by the Planning Secretary, a copy of the audit report must be submitted to the Planning Secretary and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Planning Secretary.

Note: The audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Planning Secretary.

5.3 COMMUNITY CONSULTATION AND COMPLAINTS HANDLING

Environmental goals, compliance, and procedures in relation to community consultation and complaints handling are set out in the following table.

COMMUNITY CONSULTATION AND COMPLAINTS HANDLING		**OP 13**
Primary environmental goals		• Notifying stakeholders regarding key aspects of the operations on site. • Identifying environmental issues and ensuring complaints are investigated and acted upon as required.
Related environmental goals		• Understanding any concerns of local community groups. • Preventing degradation of local amenity. • Providing adequate staffing and training.
Compliance with Condition **C6**		Key consent conditions relevant to community consultation and complaints handling on the site are set out below. • Ensure the local community and relevant agencies are kept informed about the operations and environmental performance of the facility. • Receive, handle, respond to and record complaints. • Resolve any disputes that arise.
PROCEDURES		
OP13.1	Consultation	Community consultation activities to be undertaken include: • a dedicated Benedict webpage; and • a community telephone line to provide a central point of contact for community enquiries.
OP13.2	Website	The following are to be published on the website: • all relevant statutory approvals for the facility; • the OEMP, including accompanying environmental management plans; • a summary of all monitoring results; • a complaints register updated on a monthly basis; and • annual reviews and independent environmental audits.
OP 13.3	Complaints reporting	Complaints received from an outside party are to be reported immediately to the Site Supervisor and the Site Manager.
OP 13.4	Investigations	Any complaint received is to be investigated, including identification of the: • cause of the complaint; • climatic conditions at the time of the incident; • date and time the incident took place; and • occurrence of similar complaints in the past.
OP 13.5	Recording	Details of any complaints received are to be recorded on the facilities' corporate records system and kept for at least four years.

5.4 INCIDENT REPORTING

Environmental goals and procedures in relation to incident reporting are set out in the following table.

INCIDENT REPORTING		**OP 14**
Primary environmental goal		Reporting incidents so that potential environmental hazards are identified.
Related environmental goals		• Ensure compliance with the consent and the EPL. • Prevent pollution of water. • Manage stormwater. • Manage wastewater. • Prevent the degradation of local amenity. • Prevent unauthorised entry. • Provide adequate firefighting capacity. • Provide adequate staffing and training. • Provide and maintain a safe working environment.
PROCEDURES		
OP 14.1	Internal reporting	In all cases where an incident or accident occurs which has the potential to harm the environment the incident is to be reported immediately to the Site Supervisor.
OP 14.2	External reporting	The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The EPA is to be advised of any incident that poses a threat to the environment as soon as practical after the incident occurs. The incident is to be reported by telephoning: • **EPA Pollution Hotline: 131 555.** Formal written advice of the incident is to be forwarded to the EPA within 7 days of the incident. **NOTE: The external reporting requirement does not apply when the harm or potential for harm is permitted for the site.**
OP 14.3	Reportable incidents	Reportable incidents include: • Dumping of a prohibited waste on site. • Any other incident or observation that could pose an immediate environmental hazard that is not characteristic of the normal operations of the facility.
OP 14.4	Incident reports	Following containment and/or amelioration of the incident, an incident report is to be prepared. This report is to be recorded on the facilities' record system and is to include the: • time and date the incident occurred; • party recording the incident; • nature, details, location, and cause of the incident; • duration of the incident; • actions to be taken to contain and/or ameliorate the effects of the incident; • name, addresses and telephone numbers of witnesses to the incident; and

INCIDENT REPORTING		OP 14
		• actions that could be taken to minimise the risk of such incident recurring. Records of the incident are to be kept for at least four years.
OP 14.5	Non-Compliance	The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.

5.5 EMERGENCY REPONSE MANAGMENT

The following are priorities if an emergency situation occurs at the facility:

- the protection of human life and welfare;
- the protection of the environment; and
- the protection of Benedict's assets.

An Emergency Management Plan (Appendix H) has been developed by Benedict Recycling as a means of identifying potential emergency situations and identifying the appropriate response that should be followed when dealing with an emergency. The Emergency Management Plan is included as Appendix H and includes details of:

- emergency control organisation;
- fire safety equipment and systems;
- the evacuation plan;
- the Fire Hydrant Block Plan;
- the Fire Sprinkler Block Plan; and
- emergency procedures for:
  - fire or explosion;
  - medical Emergency;
  - phone threat;
  - severe storms;
  - gas leaks and airborne contaminants;
  - civil disturbance; and
  - stockpile fire management.

5.6 DOCUMENT CONTROL

To ensure this OEMP and accompanying environmental management plans are updated on a regular basis and to incorporate additional management measures (as required), this OEMP is to be reviewed and revised (if necessary) within three months of the following (in accordance with Condition C8):

- approval of any modification of the conditions of the consent;
- submission of an incident report under condition C11;
- completion of an Independent Environmental Audit under condition C16; and/or
- the issue of a direction of the Planning Secretary under condition A2(b) which requires a review.

All revisions to the OEMP are to be approved by DPIE prior to implementation.

This OEMP is to be distributed to all appropriate staff involved in the operation and management of the facility. Revised and updated versions of this OEMP and accompanying management plans, once approved, supersede earlier versions must be issued to all registered holders of this OEMP with a memo summarising the changes.

A register is to be maintained detailing the new version number and the date of issue.

6 COMPLIANCE REPORTING

Compliance reporting is required to provide a systematic review of the environmental performance of the facility in accordance with legislative requirements. The reports required are summarised in Table 6.1.

Table 6.1 Required reporting

Type of report	Frequency	Distribution	Report inclusions
Incident reporting	Notify immediately and report within 7 days	DPIE and EPA	Written report detailing the date, time, nature, cause of the incident and preventative /corrective actions.
Annual review	Yearly	DPIE	Written report, including: • conditions compliance report; • review of complaints; • review of monitoring results including a comparison of these against the relevant statutory requirements; • identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; • identify any trends in the monitoring data over the life of the facility; • identify any discrepancies between the predicted and actual impacts of the facility, and analyse the potential cause of any significant discrepancies; and • describe what measures are to be implemented over the next year to improve the environmental performance of the facility.
Annual return	Yearly	EPA	Online form submission.
Environmental Reporting	Various	Public	Regular reporting on the environmental performance of the Facility must be provided on the Company website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of the Consent.
Independent environmental audit	Within 1 year of commencement of expanded operations and every 3 years thereafter	DPIE	The environmental audit is to be conducted by an independent party endorsed by DPIE and is to include: • consultation with relevant agencies; • an assessment of the environmental performance of the facility and compliance with relevant approvals; and • recommend measures or actions to improve performance. Within 3 months of commissioning an audit a copy of the audit report, including a timetable for the implementation of recommendations, is to be submitted to the Secretary.

APPENDIX A – COMPLIANCE REGISTER

Compliance Register

Condition	Requirement	Where Addressed in OEMP
PART A: ADMINISTRATIVE CONDITIONS		
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT		
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 facility, and any rehabilitation required under this Consent.	Section 4
TERMS OF CONSENT		
A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) in accordance with the EIS, Response to Submissions and additional information; (d) in accordance with the development Layout in Appendix 1; and (e) in accordance with the management and mitigation measures in Appendix 2.	Noted
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).	Noted
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in conditions A2(c) to (e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in conditions A2(c) to (e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Noted
LIMITS OF CONSENT		
A5	This consent lapses five years after the date from which it operates unless the development has physically commenced on the land to which the consent applies before that date.	Noted

Condition	Requirement	Where Addressed in OEMP
A6	The only type of waste permitted to be received or processed at the site is waste classified as general solid waste (non-putrescible).	Section 4.2
A7	The Applicant must not: (a) receive or process more than 180,000 tonnes of general solid waste (non-putrescible) per year; and (b) store more than 1,600 tonnes of general solid waste (non-putrescible) at any one time.	Chapter 4.2
A8	Stockpiles of processed and/or unprocessed waste on site must not be more than 5 metres in height when measured from the finished ground level of the site.	Noted
A9	The Applicant may carry out activities including receipt, dispatch and sorting of waste, 24 hours, 7 days per week for a continuous two-week period for a maximum of six times per calendar year, subject to the following: the two-week periods cannot be consecutive, and must be at least two weeks apart; the two-week period includes weekdays, weekends and public holidays; the licensee must notify the EPA and the Planning Secretary at least 24 hours prior to commencing each two-week period; and the licensee must notify the EPA and the Planning Secretary of any complaints received during the two-week period as soon as possible after the complaint is made.	Section 3.5
NOTIFICATION OF COMMENCEMENT		
A10	The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date or as otherwise agreed by the Planning Secretary: (a) construction; (b) operation; (c) cessation of operations; and (d) decommissioning.	Noted
A11	If the construction, operation or decommissioning of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage or as otherwise agreed Planning Secretary, of the date of commencement and the development to be carried out in that stage.	Noted

Condition	Requirement	Where Addressed in OEMP
EVIDENCE OF CONSULTATION		
A12	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken including: 1. the outcome of that consultation, matters resolved and unresolved; and 2. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Noted
REQUEST FOR INFORMATION		
A13	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	Section 4.4
A14	The Applicant must retain all weighbridge records as required by the POEO (Waste) Regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Planning Secretary and/or EPA.	Section 4.4
A15	The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the development. The waste classification records must be made immediately available on request by the EPA and/or the Planning Secretary.	Section 4.4
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS		
A16	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	Noted
A17	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Noted

Condition	Requirement	Where Addressed in OEMP
A18	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Noted
PROTECTION OF PUBLIC INFRASTRUCTURE		
A19	Prior to the commencement of construction, the Applicant must: (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; (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (c) submit a copy of this report to the Planning Secretary and where it affects council infrastructure, Council.	Noted
A20	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.	Noted
DEMOLITION		
A21	All demolition must be carried out in accordance with *Australian Standard AS 2601-2001 The Demolition of Structures* (Standards Australia, 2001).	Noted
STRUCTURAL ADEQUACY		
A22	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Note: • *Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.* • *Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.* • *Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District.*	Not applicable for the OEMP

Condition	Requirement	Where Addressed in OEMP
COMPLIANCE		
A23	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made 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 5.2
OPERATION OF PLANT AND EQUIPMENT		
A24	All plant and equipment used on site, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Noted
EXTERNAL WALLS AND CLADDING		
A25	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	Not applicable for the OEMP
A26	Before the issue of a Construction Certificate and an Occupation Certificate, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use or used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.	Not applicable for the OEMP
A27	The Applicant must provide a copy of the documentation given to the Certifying Authority under condition A26 to the Planning Secretary within seven days after the Certifying Authority accepts it.	Not applicable for the OEMP
UTILITIES AND SERVICES		
A28	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Not applicable for the OEMP
WORK AS EXECUTED PLANS		
A29	Before the issue of the final Occupation Certificate, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Principal Certifier.	Not applicable for the OEMP

Condition	Requirement	Where Addressed in OEMP
APPLICABILITY OF GUIDELINES		
A30	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	Noted
A31	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Noted
ADVISORY NOTES		
AN1	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	Noted
PART B: SPECIFIC ENVIRONMENTAL CONDITIONS		
WASTE MANAGEMENT		
B1	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Section 4.2
B2	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by an EPL. No putrescible waste may be received, stored or processed on site.	Section 4.2
Receipt, Storage and Handling of Waste		
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.	Section 4.2
B4	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the EPA's *Waste Classification Guidelines Part 1: Classifying Waste, November 2014*, or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.	Section 4.2
B5	All waste must be stored wholly within the designated waste storage areas.	Section 4.2
B6	All waste must be loaded and unloaded within the designated loading and unloading areas.	Section 4.2

Condition	Requirement	Where Addressed in OEMP
Operational Waste Management and Monitoring Plan		
B7	Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan (WMP) for the development, to the satisfaction of the Planning Secretary. The WMP must form part of the OEMP required by condition C5 and must: (a) detail the type and quantity of waste to be generated during operation of the development; (b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the POEO Act, the POEO *(Waste) Regulation, 2014* and the EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014); (c) include details of the waste stockpile limits in the raw feed and finished product storage areas; (d) include procedures for ensuring no build-up of waste will occur in the raw feed waste stockpile area during unexpected machinery breakdown (e) detail the requirements for non-conforming waste handling and removal; and (f) include details of how the site is consistent with the Standards for managing construction waste in NSW including staff training.	Appendix C
B8	The Applicant must: (a) not commence operation until the WMP is approved by the Planning Secretary; and (b) implement the most recent version of the WMP approved by the Planning Secretary.	Noted
Waste Monitoring Program		
B9	From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development. The program must: (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; (b) include suitable provisions to monitor the: 1. quantity, type and source of waste received on site; and 2. quantity, type and quality of the outputs produced on site; and (c) ensure that: 1. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and 2. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	Waste Management and Monitoring Plan (Appendix C)

Condition	Requirement	Where Addressed in OEMP
Pests, Vermin and Noxious Weed Management		
B10	The Applicant must: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area. ***Note**: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.*	Section 4.9
TRAFFIC AND ACCESS		
Operating Conditions		
B11	The Applicant must ensure: (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004) and AS 2890.2:2002 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2002); (b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines; (c) the development does not result in any vehicles queuing on the public road network; (d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site; (e) all vehicles are wholly contained on site before being required to stop; (f) all loading and unloading of materials is carried out on-site; (g) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; and (h) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.	Operational Traffic Management Plan (Appendix F)

Condition	Requirement	Where Addressed in OEMP
Construction Management Plan		
B12	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: (a) be prepared by a suitably qualified and experienced person(s); (b) detail the measures that are to be implemented to ensure road safety and network efficiency; (c) detail heavy vehicle routes, access and parking arrangements; (d) include a Driver Code of Conduct to: (i) minimise the impacts on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; (iv) ensure truck drivers use specified haul routes; and (v) include a program to monitor the effectiveness of these measures; (e) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.	Not applicable for the OEMP
B13	The Applicant must: (a) not commence operation until the CTMP required by condition B12 is approved by the Planning Secretary; and (b) The Applicant must ensure the CTMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development.	Not applicable for the OEMP

Condition	Requirement	Where Addressed in OEMP
Operational Traffic Management Plan		
B14	Prior to the commencement of operation, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by condition C5 and must: (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council; (c) detail the measures that are to be implemented to ensure road safety and network efficiency; (d) detail heavy vehicle routes, access and parking arrangements; (e) include a Driver Code of Conduct to: 1. minimise the impacts on the local and regional road network; 2. minimise conflicts with other road users; 3. minimise road traffic noise; 4. ensure truck drivers use specified haul routes; and (f) include a Traffic Control Plan detailing: 1. the on-site measures to be implemented to control the manoeuvring of vehicles in designated areas, including font-end loaders within the waste storage building; 2. installation of way-finding signage and line marking; and (g) include a program to monitor the effectiveness of these measures.	Section 4.6 Operational Traffic Management Plan (Appendix F)
B15	The Applicant must: (a) not commence operation until the OTMP required by condition B14 is approved by the Planning Secretary; and (b) The Applicant must ensure the OTMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development.	Noted

Condition	Requirement	Where Addressed in OEMP
SIOLS, WATER QUALITY AND HYDROLOGY		
Erosion and Sediment Control		
B16	Prior to the commencement of any construction the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.	Not applicable for the OEMP
Discharge Limits		
B17	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	**Noted**
Stormwater Management System		
B18	Prior to the commencement of operation, the Applicant must design, install and operate a stormwater management system for the development. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be designed in accordance with the management and mitigation measures identified in condition A2; (c) be generally in accordance with the conceptual design in the EIS; (d) be in accordance with applicable Australian Standards; and (e) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and *Managing Urban Stormwater: Council Handbook* (EPA, 1997) guidelines.	Section 4.5 Water Management Plan (Appendix D)
AIR QUALITY		
Dust Minimisation		
B19	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Section 4.7
B20	During construction, the Applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Not applicable for the OEMP

Condition	Requirement	Where Addressed in OEMP
Air Quality Discharges		
B21	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	Section 4.7
B22	The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Section 4.7
Air Quality Management Plan		
B23	Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by condition C5 and must: NSW Government 11 Penrith Waste and Recycling Facility Department of Planning, Industry and Environment (SSD 7733) (a) be prepared by a suitably qualified and experienced person(s); (b) detail and rank all emissions from all sources of the development, including particulate emissions; (c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators; (d) identify the control measures that that will be implemented for each emission source; and (e) describe proactive and reactive management strategies.	Air Quality Management Plan (Appendix E)
B24	The Applicant must: (a) not commence operation until the Air Quality Management Plan required by condition B23 is approved by the Planning Secretary; and (b) implement the most recent version of the Air Quality Management Plan approved by the Planning Secretary for the duration of the development.	Noted

<table>
<tr><th>Condition</th><th>Requirement</th><th>Where Addressed in OEMP</th></tr>
<tr><td colspan="3">NOISE</td></tr>
<tr><td colspan="3">Hours of Work</td></tr>
<tr><td>B25</td><td>The Applicant must comply with the hours detailed in Table 1, other than as specified in condition A9.
Table 1 Hours of Work
<table>
<tr><th colspan="2">Activity</th><th>Day</th><th>Time</th></tr>
<tr><td colspan="2">Earthworks and construction</td><td>Monday – Friday
Saturday</td><td>7 am to 6 pm
8 am to 1 pm</td></tr>
<tr><td rowspan="2">Operation</td><td>Deliveries and dispatching</td><td>Monday – Friday
Saturday
Sunday
Public Holidays</td><td>6 am to 10 pm
6 am to 6 pm
8 am to 4 pm
Nil</td></tr>
<tr><td>Material sorting or processing</td><td>Monday – Friday
Saturday
Sunday and Public Holidays</td><td>6 am to 10 pm
7 am to 6 pm
Nil</td></tr>
</table></td><td>Section 3.5</td></tr>
<tr><td>B26</td><td>Works outside of the hours identified in condition B25 may be undertaken in the following circumstances:
(a) works that are inaudible at the nearest sensitive receivers;
(b) works agreed to in writing by the Planning Secretary;
(c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or
(d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.</td><td>Section 3.5</td></tr>
<tr><td colspan="3">Construction Noise Limits</td></tr>
<tr><td>B27</td><td>The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (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.</td><td>Not applicable for the OEMP</td></tr>
</table>

<table>
<tr><th>Condition</th><th>Requirement</th><th>Where Addressed in OEMP</th></tr>
<tr><td colspan="3">Operational Noise Limits</td></tr>
<tr><td>B28</td><td>The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2.
Table 2 Noise Limits dB(A)
<table>
<tr><th>Location</th><th>Day
$L_{Aeq(15\ minute)}$</th><th>Evening/ Morning Shoulder
$L_{Aeq(15\ minute)}$</th></tr>
<tr><td>All residential receivers</td><td>40</td><td>35</td></tr>
</table>
Note: Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy (EPA, 1999) (as may be updated or replaced from time to time). Refer to the plan in Appendix 2 for the location of residential sensitive receivers.</td><td>Section 4.8</td></tr>
<tr><td colspan="3">ABORIGINAL HERITAGE</td></tr>
<tr><td colspan="3">Unexpected Finds Protocol</td></tr>
<tr><td>B29</td><td>If any item or object of Aboriginal heritage significance is identified on site:
(a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately;
(b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and
(c) the EES must be contacted immediately.</td><td>Unexpected Finds Protocol (CEMP)</td></tr>
<tr><td>B30</td><td>Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.</td><td>Unexpected Finds Protocol (CEMP)</td></tr>
</table>

Condition	Requirement	Where Addressed in OEMP
HAZARDS AND RISK		
Hazardous waste		
B31	The Applicant must implement auditable procedures to handle and dispose of hazardous waste materials such as asbestos, sharps and chemical/biological materials that have been received on site.	Section 4.3 Waste Management and Monitoring Plan (Appendix C)
Dangerous Goods		
B32	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department's *Hazardous and Offensive Development Application Guidelines* – Applying SEPP 33 at all times.	Section 4.3 Waste Management and Monitoring Plan (Appendix C)
B33	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with: (a) all relevant Australian Standards; (b) the Environment Protection Manual for *Authorised Officers: Bunding and Spill Management* – Technical Bulletin (EPA, 1997).	Section 4.3 Waste Manage-ment and Monitoring Plan (Appendix C)
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.	Noted

Condition	Requirement	Where Addressed in OEMP
Bunding		
B35	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 EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Manual* (Department of Environment and Climate Change, 2007).	Section 4.3 Waste Management and Monitoring Plan (Appendix C)
FIRE SAFETY		
Fire Safety System		
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.	Not applicable for the OEMP
CONTAMINATION		
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.	Not applicable for the OEMP
VISUAL AMENITY		
Lighting		
B38	The Applicant must ensure the lighting associated with the development: (a) complies with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	Noted

Condition	Requirement	Where Addressed in OEMP
PART C: ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING		
MANAGEMENT PLAN REQUIREMENTS		
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: (a) detailed baseline data; (b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (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; (c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; (d) a program to monitor and report on the: (i) impacts and environmental performance of the development; (ii) effectiveness of the management measures set out pursuant to paragraph (c) above; (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; (f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; and (h) a protocol for periodic review of the plan. **Note**: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	This plan

Condition	Requirement	Where Addressed in OEMP
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN		
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.	Not applicable for the OEMP
C3	As part of the CEMP required under condition C2 of this consent, the Applicant must include the following: (a) Construction Traffic Management Plan (see condition B12); (b) Erosion and Sediment Control Plan (see condition B16); (c) Unexpected Contamination Procedure (see condition B37).	Not applicable for the OEMP
C4	The Applicant must: (a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and (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.	Not applicable for the OEMP
OPERATIONAL ENVIRONMENTAL MANAGMENT PLAN		
C5	The Applicant must prepare an Operational Environmental Management Plan (OEMP) in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	This plan
C6	As part of the OEMP required under condition C5 of this consent, the Applicant must include the following: (a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (b) describe the procedures that would be implemented to: 1. keep the local community and relevant agencies informed about the operation and environmental performance of the development; 2. receive, handle, respond to, and record complaints; 3. resolve any disputes that may arise; 4. respond to any non-compliance; 5. respond to emergencies; and (c) include the following environmental management plans: 1. Waste Management Plan (see condition B7); 2. Operational Traffic Management Plan (see condition B14); 3. Air Quality Management Plan (see condition B23);	Section 5.1

Condition	Requirement	Where Addressed in OEMP
C7	The Applicant must: (a) not commence operation until the OEMP is approved by the Planning Secretary; and (b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	Noted
Revision of Strategies, Plans and Programs		
C8	Within three months of: (a) the submission of an incident report under condition C11; (b) the submission of an Independent Environmental Audit under condition C16; (c) the approval of any modification of the conditions of this consent; or (d) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review,	Section 5.6
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 5.6
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. **Note**: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	Section 5.6
REPORTING AND AUDITING		
Incident notification		
C11	The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au 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 of the consent.	Section 5.4 and the Waste Management and Monitoring Plan (Appendix C)

Condition	Requirement	Where Addressed in OEMP
Non- Compliance Notification		
C12	The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.	Section 5.4 and the Waste Management and Monitoring Plan (Appendix C)
C13	The Applicant must provide regular reporting on the environmental performance of the Facility on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this Consent.	Section 5.4 and the Waste Management and Monitoring Plan (Appendix C)
C14		
ANNUAL REVIEW		
C15	Within three months after the first year of commencement of operation, and in the same month each subsequent year (or such other timing as may be agreed by the Planning Secretary), the Applicant must submit a report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. The review must: (a) describe the development that was carried out in the previous year, and the development that is proposed to be carried out in the current year; (b) include a comprehensive review of the monitoring results and complaints records from the previous year, including a comparison of these against the: 1. relevant statutory requirements, limits or performance measures/criteria; 2. requirements of any plan or program required under this consent; 3. monitoring results of previous years; and 4. the relevant predictions in the EIS, Response to Submissions;	Chapter 6

Condition	Requirement	Where Addressed in OEMP
	(c) identify any non-compliances and any incidents which occurred over in the previous year, and describe what actions were (or are being) taken to rectify the non-compliance or incident and avoid recurrence; NSW Government 15 Penrith Waste and Recycling Facility Department of Planning, Industry and Environment (SSD 7733) (d) identify any trends in the monitoring data over the life of the development; (e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the development.	
INDEPENDENT ENVIRONMENTAL AUDIT		
C16	Within one year of the commencement of operation, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the development. Audits must: (a) be led and conducted by a suitably qualified, experienced and independent team of experts; (b) be carried out in consultation with the relevant agencies; (c) assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any strategy, plan or program required under this consent; (d) review the adequacy of any approved strategy, plan or program required under this consent; and (e) recommend measures or actions to improve the environmental performance of the development, and any strategy, plan or program required under this consent.	Chapter 6
C17	Within three months of commissioning an Independent Environmental Audit, or within another timeframe agreed by the Planning Secretary, a copy of the audit report must be submitted to the Planning Secretary and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Planning Secretary. **Note**: The audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Planning Secretary.	Section 5.6 and Chapter 6

Condition	Requirement	Where Addressed in OEMP
MONITORING AND ENVIRONMENTAL AUDITS		
C18	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification and independent environmental auditing. **Note:** For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.	Noted
ACCESS TO INFORMATION		
C19	At least 48 hours before the commencement of construction and for the life of the development, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in condition A2 of this consent and the final layout plans for the development; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (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; (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; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaint register, updated monthly; (ix) the Compliance Reporting of the development; (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; (xi) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary.	Noted.

Condition	Requirement	Where Addressed in OEMP
APPLICANTS MANAGEMENT AND MITIGATION MEASURES – Appendix 2 of the Consent		
Air quality		
	The OEMP will include an air quality management plan (AQMP) that will detail the implementation of the following air quality management measures: • misters will operate at the shed's vehicle ingress and egress points; • misters will operate at the southern stockpile area; • the entire site will be sealed (as it is already) except for the landscaped verge along Peachtree Road; and • a wheel wash will be used to clean truck tyres to prevent mud or sediment being carried to and deposited on public roads.	Section 4.7 Air Quality Management Plan (Appendix E)
	The OEMP will include the following management measures to prevent odour emissions from the site: • putrescible waste will not be accepted on site; • odorous materials will not be accepted on site; • garden waste will be dispatched to another facility licensed to accept it, as soon as there is enough to fill a dispatch vehicle, or if the material starts to compost (whichever is sooner); and • no composting will be undertaken on site, as verified by daily infrared, visual and odour testing as outlined in Section 4.1.12iic.	Section 4.7
Greenhouse gases		
	The OEMP will include the following management measures to prevent/minimise greenhouse gas emissions associated with the site: • on-site equipment will be regularly maintained and serviced to maximise fuel efficiency; • vehicle kilometres travelled on site will be minimised; and • energy efficiency will be progressively reviewed and implemented throughout the life of the facility.	Section 4.7

Condition	Requirement	Where Addressed in OEMP
Noise		
	The OEMP will include the following management measures to minimise noise impacts: • material sorting will not take place on public holidays, Sundays or before 7 am on Saturdays; • noisy activities and adoption of improvement techniques will be identified; • the movement of materials and plant and unnecessary metal-on-metal contact will be minimised; • material drop heights and the dragging of materials will be minimised; • quieter plant and equipment will be chosen based on the optimal power and size to most efficiently perform the required tasks; • plant and equipment will be operated in the quietest and most efficient manner; • plant and equipment will be regularly inspected and maintained to minimise noise and vibration, and to ensure that all noise and vibration reduction devices are operating efficiently; • noise-related complaints will be handled promptly; and • a complaints register will be maintained.	Section 4.8
Visual		
	The OEMP will require the site's frontage be kept tidy and litter free. The OEMP will include a management plan for the landscaped area of the site.	Landscape Management Plan (Appendix G)
Water		
	The OEMP will include the following management measures to minimise water impacts: • the shed's guttering system will be inspected on an annual basis to remove accumulated debris; • the rainwater tank will be inspected on a six-monthly basis for structural integrity; • drainage inlet pit sediment traps will be inspected on a monthly basis and cleared as necessary; • the drainage system will be inspected on a six-monthly basis and cleared to remove accumulated materials; • driveways will be swept and cleaned daily; • groundwater will not be used; • a water management plan will be prepared that will outline the procedures and duration for the monitoring of relevant water quality aspects (eg turbidity and nutrients), including trigger values and responses and contingency measures.	Section 4.5 Water Management Plan (Appendix D)

Condition	Requirement	Where Addressed in OEMP
Diesel spill		
	The OEMP will include the following management measures to minimise impacts associated with a diesel spill: - diesel will be supplied to mobile plant by an appropriately licensed and qualified on-site refuelling contractor using a mini-tanker; - refuelling and emergency spill response activities will be detailed; and - there will be a diesel spill kit stored within the shed.	Section 4.3
Traffic and vehicle movement		
	The OEMP will include an operational traffic management plan that will: • restrict queuing or parking of vehicle on Peachtree Road; • outline routes for light and heavy vehicles, including restricting access for heavy vehicles from the west of the site; • detail on-site measures to control the movements of light and heavy vehicles into, within and out of the site; • detail the responsibilities of traffic controller on site; and • detail parking and stopping arrangements within the site (e.g. the requirements for the circulation, truck tipping, hand unloading and car parking areas).	Section 4.6 Operational Traffic Management Plan (Appendix F)

APPENDIX B – THE CONSENT (SSD 7733)

Development Consent

Section 4.38 of the *Environmental Planning and Assessment Act 1979*

As delegate of the Minister for Planning and Public Spaces under delegation executed on 9 March 2020, I approve the Development Application referred to in Schedule 1, subject to the conditions specified in Schedule 2.

These conditions are required to:

- prevent, minimise, or offset adverse environmental impacts;
- set standards and performance measures for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the ongoing environmental management of the development

Anthea Sargeant
Executive Director
Regions, Industry and Key Sites

Sydney 15/5/2020 File: OBJ16/09091

SCHEDULE 1

Application Number:	SSD-7733
Applicant:	NSW Waste Recycling Pty Ltd
Consent Authority:	Minister for Planning and Public Spaces
Site:	Lot 45 DP 793931 46-48 Peachtree Road, Penrith
Development:	Construction and operation of a waste transfer station with a capacity of up to 180,000 tonnes per annum (tpa) of general solid (non-putrescible waste), including pre-classified waste types including sorting, storage and dispatch of materials to other facilities.

TABLE OF CONTENTS

DEFINITIONS

Applicant	NSW Waste Recycling Pty Ltd, or any person carrying out any development to which this consent applies
BCA	Building Code of Australia
BC Act	*Biodiversity Conservation Act 2016*
Certifier	A person who is authorised by or under section 6.5 of the EP&A Act to issue Part 6 certificates
CEMP	Construction Environmental Management Plan
conditions of this consent	conditions contained in Schedule 2 of this document
Construction	The demolition and removal of buildings or works, the carrying out of works for the purpose of the development, including bulk earthworks, and erection of buildings and other infrastructure permitted by this consent
Council	Penrith City Council
Day	The period from 7 am to 6 pm on Monday to Saturday, and 8 am to 6 pm on Sundays and Public Holidays
Decommissioning	The controlled process of safely retiring a facility from service, including decontamination, dismantling and disposal after the cessation of operations.
Demolition	The deconstruction and removal of buildings, sheds and other structures on the site
Department	NSW Department of Planning, Industry and Environment
Development	The development described in the EIS and Response to Submissions, including the works and activities comprising the construction and operation of a waste transfer station to process up to 180,000 tonnes per annum including the sorting, storage and dispatch of materials to other facilities, as modified by the conditions of this consent
Development layout	The plans at Appendix 1 of this consent
Earthworks	Bulk earthworks, site levelling, import and compaction of fill material, excavation for installation of drainage and services, to prepare the site for construction
EES	Environment, Energy and Science Group
EIS	The Environmental Impact Statement titled '*Environmental Impact Statement for Penrith Waste Recycling and Transfer Facility, 46-48 Peachtree Road, Penrith State Significant Development 7733'*, prepared by EMM Consulting Pty Ltd dated 2 June 2017, submitted with the application for consent for the development, including any additional information provided by the Applicant in support of the application
ENM	Excavated Natural Material
Environment	Includes all aspects of the surroundings of humans, whether affecting any human as an individual or in his or her social groupings
EPA	NSW Environment Protection Authority
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPL	Environment Protection Licence under the POEO Act
Evening	The period from 6 pm to 10 pm
Heritage	Encompasses both Aboriginal and historic heritage including sites that predate European settlement, and a shared history since European settlement
Heritage item	An item as defined under the Heritage Act 1977, and assessed as being of local, State and/ or National heritage significance, and/or an Aboriginal Object or Aboriginal Place as defined under the National Parks and Wildlife Act 1974', the World Heritage List, or the National Heritage List or Commonwealth Heritage List under the Environment Protection and Biodiversity Conservation Act 1999 (Cth), or anything identified as a heritage item under the conditions of this consent

Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance Note: "material harm" is defined in this consent
Material harm	Is harm that: • involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or • results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)
Minister	NSW Minister for Planning and Public Spaces (or delegate)
Mitigation	Activities associated with reducing the impacts of the development prior to or during those impacts occurring
Monitoring	Any monitoring required under this consent must be undertaken in accordance with section 9.40 of the EP&A Act
Night	The period from 10pm to 7am on Monday to Saturday, and 10pm to 8am on Sundays and Public Holidays
NCC	National Construction Code
Non-compliance	An occurrence, set of circumstances or development that is a breach of this consent
OEMP	Operational Environmental Management Plan
Operation	The operation of a waste transfer station to process up to 180,000 tonnes per annum of building and demolition waste upon completion of construction.
Principal Certifier	Principal Ceritifier in accordance with the EP&A Act
Planning Secretary	The Planning Secretary of the Department of Planning, Industry and Environment, or nominee
POEO Act	*Protection of the Environment Operations Act 1997*
POEO (Waste) Regulation	Protection of the Environment Operations (Waste) Regulation 2014
Reasonable	Means applying judgement in arriving at a decision, taking into account: mitigation benefits, costs of mitigation versus benefits provided, community views, and the nature and extent of potential improvements.
Response to submissions	Response to Submissions titled *Penrith Waste Recycling and Transfer Facility* prepared by EMM Consulting dated November 2018
RMS	NSW Roads and Maritime Services
Sensitive receivers	A location where people are likely to work, occupy or reside, including a dwelling, school, hospital, office or public recreational area.
Site	The land defined in Appendix 1.
TfNSW	Transport for New South Wales
VENM	Virgin Excavated Natural Material
Waste	Has the same meaning as the definition of the term in the Dictionary to the POEO Act
Year	A period of 12 consecutive months

SCHEDULE 2

PART A ADMINISTRATIVE CONDITIONS

OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT

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.

TERMS OF CONSENT

A2. The development may only be carried out:

(a) in compliance with the conditions of this consent;

(b) in accordance with all written directions of the Planning Secretary;

(c) in accordance with the EIS, Response to Submissions and additional information;

(d) in accordance with the development Layout in Appendix 1; and

(e) in accordance with the management and mitigation measures in Appendix 2.

A3. Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:

(a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and

(b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).

A4. The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in conditions A2(c) to (e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in conditions A2(c) to (e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.

LIMITS OF CONSENT

A5. This consent lapses five years after the date from which it operates, unless the development has physically commenced on the land to which the consent applies before that date.

A6. The only type of waste permitted to be received or processed at the site is waste classified as general solid waste (non-putrescible).

A7. The Applicant must not:

(a) receive or process more than 180,000 tonnes of general solid waste (non-putrescible) per year; and

(b) store more than 1,600 tonnes of general solid waste (non-putrescible) at any one time.

A8. Stockpiles of processed and/or unprocessed waste on site must not be more than 5 metres in height when measured from the finished ground level of the site.

A9. The Applicant may carry out activities including receipt, dispatch and sorting of waste, 24 hours, 7 days per week for a continuous two-week period for a maximum of six times per calendar year, subject to the following:

(a) the two-week periods cannot be consecutive, and must be at least two weeks apart;
(b) the two-week period includes weekdays, weekends and public holidays;
(c) the licensee must notify the EPA and the Planning Secretary at least 24 hours prior to commencing each two-week period; and
(d) the licensee must notify the EPA and the Planning Secretary of any complaints received during the two-week period as soon as possible after the complaint is made.

NOTIFICATION OF COMMENCEMENT

A10. The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date or as otherwise agreed by the Planning Secretary:

(a) construction;

(b) operation;

(c) cessation of operations; and

(d) decommissioning.

A11. If the construction, operation or decommissioning of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage or as otherwise agreed Planning Secretary, of the date of commencement and the development to be carried out in that stage.

EVIDENCE OF CONSULTATION

A12. Where conditions of this consent require consultation with an identified party, the Applicant must:

(a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and

(b) provide details of the consultation undertaken including:

(i) the outcome of that consultation, matters resolved and unresolved; and

(ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.

REQUEST FOR INFORMATION

A13. The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.

A14. The Applicant must retain all weighbridge records as required by the POEO (Waste) Regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Planning Secretary and/or EPA.

A15. The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the development. The waste classification records must be made immediately available on request by the EPA and/or the Planning Secretary.

STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS

A16. With the approval of the Planning Secretary, the Applicant may:

(a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);

(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and

(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).

A17. If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.

A18. If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.

PROTECTION OF PUBLIC INFRASTRUCTURE

A19. Prior to the commencement of construction, the Applicant must:

(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;

(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and

(c) submit a copy of this report to the Planning Secretary and where it affects council infrastructure, Council.

A20. Unless the Applicant and the applicable authority agree otherwise, the Applicant must:

(a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the development; and

(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.

DEMOLITION

A21. All demolition must be carried out in accordance with *Australian Standard AS 2601-2001 The Demolition of Structures* (Standards Australia, 2001).

STRUCTUAL ADEQUACY

A22. All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.

Note:

- *Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.*
- *Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.*
- *Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District.*

COMPLIANCE

A23. The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.

OPERATION OF PLANT AND EQUIPMENT

A24. All plant and equipment used on site, or to monitor the performance of the development must be:

(a) maintained in a proper and efficient condition; and

(b) operated in a proper and efficient manner.

EXTERNAL WALLS AND CLADDING

A25. The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.

A26. Before the issue of a Construction Certificate and an Occupation Certificate, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use or used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.

A27. The Applicant must provide a copy of the documentation given to the Certifying Authority under condition A26 to the Planning Secretary within seven days after the Certifying Authority accepts it.

UTILITIES AND SERVICES

A28. Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.

WORKS AS EXECUTED PLANS

A29. Before the issue of the final Occupation Certificate, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Principal Certifier.

APPLICABILITY OF GUIDELINES

A30. References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.

A31. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.

ADVISORY NOTES

AN1. All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.

PART B SPECIFIC ENVIRONMENTAL CONDITIONS

WASTE MANAGEMENT

B1. All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.

B2. Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by an EPL. No putrescible waste may be received, stored or processed on site.

Receipt, Storage and Handling of Waste

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.

B4. The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the EPA's *Waste Classification Guidelines Part 1: Classifying Waste, November 2014*, or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.

B5. All waste must be stored wholly within the designated waste storage areas.

B6. All waste must be loaded and unloaded within the designated loading and unloading areas.

Operational Waste Management Plan

B7. Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan (WMP) for the development, to the satisfaction of the Planning Secretary. The WMP must form part of the OEMP required by condition C5 and must:

(a) detail the type and quantity of waste to be generated during operation of the development;

(b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the POEO Act*,* th*e POEO (Waste) Regulation, 2014* and the EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014);

(c) include details of the waste stockpile limits in the raw feed and finished product storage areas;

(d) include procedures for ensuring no build-up of waste will occur in the raw feed waste stockpile area during unexpected machinery breakdown

(e) detail the requirements for non-conforming waste handling and removal; and

(f) include details of how the site is consistent with the Standards for managing construction waste in NSW including staff training.

B8. The Applicant must:

(a) not commence operation until the WMP is approved by the Planning Secretary; and

(b) implement the most recent version of the WMP approved by the Planning Secretary.

Waste Monitoring Program

B9. From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development. The program must:

(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;

(b) include suitable provisions to monitor the:

(i) quantity, type and source of waste received on site; and

(ii) quantity, type and quality of the outputs produced on site; and

(c) ensure that:

(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and

(ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.

Pests, Vermin and Noxious Weed Management

B10. The Applicant must:

(a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and

(b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area.

Note: *For the purposes of this condition, noxious weeds are those species subject to an order declared under the* Noxious Weed Act 1993*.*

TRAFFIC AND ACCESS

Operating conditions

B11. The Applicant must ensure:

(a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of *AS 2890.1:2004 Parking facilities Off-street car parking* (Standards Australia, 2004) and *AS 2890.2:2002 Parking facilities Off-street commercial vehicle facilities* (Standards Australia, 2002);

(b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines;

(c) the development does not result in any vehicles queuing on the public road network;

(d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site;

(e) all vehicles are wholly contained on site before being required to stop;

(f) all loading and unloading of materials is carried out on-site;

(g) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; and

(h) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.

Construction Traffic Management Plan

B12. 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:

(a) be prepared by a suitably qualified and experienced person(s);

(b) detail the measures that are to be implemented to ensure road safety and network efficiency;

(c) detail heavy vehicle routes, access and parking arrangements;

(d) include a Driver Code of Conduct to:

(i) minimise the impacts on the local and regional road network;

(ii) minimise conflicts with other road users;

(iii) minimise road traffic noise;

(iv) ensure truck drivers use specified haul routes; and

(v) include a program to monitor the effectiveness of these measures.

(e) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.

B13. The Applicant must:

(a) not commence operation until the CTMP required by condition B12 is approved by the Planning Secretary; and

(b) The Applicant must ensure the CTMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development.

Operational Traffic Management Plan

B14. Prior to the commencement of operation, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by condition C5 and must:

(a) be prepared by a suitably qualified and experienced person(s);

(b) be prepared in consultation with Council;

(c) detail the measures that are to be implemented to ensure road safety and network efficiency;

(d) detail heavy vehicle routes, access and parking arrangements;

(e) include a Driver Code of Conduct to:

(i) minimise the impacts on the local and regional road network;

(ii) minimise conflicts with other road users;

(iii) minimise road traffic noise;

(iv) ensure truck drivers use specified haul routes; and

(f) include a Traffic Control Plan detailing:

(i) the on-site measures to be implemented to control the manoeuvring of vehicles in designated areas, including font-end loaders within the waste storage building;

(ii) installation of way-finding signage and line marking; and

(g) include a program to monitor the effectiveness of these measures.

B15. The Applicant must:

(a) not commence operation until the OTMP required by condition B14 is approved by the Planning Secretary; and

(b) The Applicant must ensure the OTMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development.

SOILS, WATER QUALITY AND HYDROLOGY

Erosion and Sediment Control

B16. Prior to the commencement of any construction the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the *Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book* (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.

Discharge Limits

B17. The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.

Stormwater Management System

B18. Prior to the commencement of operation, the Applicant must design, install and operate a stormwater management system for the development. The system must:

(a) be designed by a suitably qualified and experienced person(s);

(b) be designed in accordance with the management and mitigation measures identified in condition A2;

(c) be generally in accordance with the conceptual design in the EIS;

(d) be in accordance with applicable Australian Standards; and

(e) ensure that the system capacity has been designed in accordance with *Australian Rainfall and Runoff* (Engineers Australia, 2016) and *Managing Urban Stormwater: Council Handbook* (EPA, 1997) guidelines.

AIR QUALITY

Dust Minimisation

B19. The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.

B20. During construction, the Applicant must ensure that:

(a) exposed surfaces and stockpiles are suppressed by regular watering;

(b) all trucks entering or leaving the site with loads have their loads covered;

(c) trucks associated with the development do not track dirt onto the public road network;

(d) public roads used by these trucks are kept clean; and

(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.

Air Quality Discharges

B21. The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.

B22. The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).

Air Quality Management Plan

B23. Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by condition C5 and must:

(a) be prepared by a suitably qualified and experienced person(s);

(b) detail and rank all emissions from all sources of the development, including particulate emissions;

(c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;

(d) identify the control measures that that will be implemented for each emission source; and

(e) describe proactive and reactive management strategies.

B24. The Applicant must:

(a) not commence operation until the Air Quality Management Plan required by condition B23 is approved by the Planning Secretary; and

(b) implement the most recent version of the Air Quality Management Plan approved by the Planning Secretary for the duration of the development.

NOISE

Hours of Work

B25. The Applicant must comply with the hours detailed in Table 1, other than as specified in condition A9.

Table 1 *Hours of Work*

Activity		Day	Time
Earthworks and construction		Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm
Operation	Deliveries and dispatching	Monday – Friday Saturday Sunday Public Holidays	6 am to 10 pm 6 am to 6 pm 8 am to 4 pm Nil
	Material sorting or processing	Monday – Friday Saturday Sunday and Public Holidays	6 am to 10 pm 7 am to 6 pm Nil

B26. Works outside of the hours identified in condition B25 may be undertaken in the following circumstances:

(a) works that are inaudible at the nearest sensitive receivers;

(b) works agreed to in writing by the Planning Secretary;

(c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or

(d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.

Construction Noise Limits

B27. The development must be constructed to achieve the construction noise management levels detailed in *the Interim Construction Noise Guideline* (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.

Operational Noise Limits

B28. The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Table 2.

Table 2 *Noise Limits dB(A)*

Location	Day $L_{Aeq(15\ minute)}$	Evening/ Morning Shoulder $L_{Aeq(15\ minute)}$
All residential receivers	40	35

Note *Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy (EPA, 1999) (as may be updated or replaced from time to time). Refer to the plan in Appendix 2 for the location of residential sensitive receivers.*

ABORIGINAL HERITAGE

Unexpected Finds Protocol

B29. If any item or object of Aboriginal heritage significance is identified on site:

(a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately;

(b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and

(c) the EES must be contacted immediately.

B30. Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the *National Parks and Wildlife Act 1974*.

HAZARDS AND RISK

Hazardous waste

B31. The Applicant must implement auditable procedures to handle and dispose of hazardous waste materials such as asbestos, sharps and chemical/biological materials that have been received on site.

Dangerous Goods

B32. The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department's *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33* at all times.

B33. Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with:

(a) all relevant Australian Standards;

(b) the Environment Protection Manual for *Authorised Officers: Bunding and Spill Management – Technical Bulletin* (EPA, 1997).

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.

Bunding

B35. 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 EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Manual* (Department of Environment and Climate Change, 2007).

FIRE SAFETY

Fire Safety System

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.

CONTAMINATION

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.

VISUAL AMENITY

Lighting

B38. The Applicant must ensure the lighting associated with the development:

(a) complies with the latest version of AS 4282-1997 - *Control of the obtrusive effects of outdoor lighting* (Standards Australia, 1997); and

(b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.

PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING

ENVIRONMENTAL MANAGEMENT

Management Plan Requirements

C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:

(a) detailed baseline data;

(b) details of:

(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);

(ii) any relevant limits or performance measures and criteria; and

(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;

(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;

(d) a program to monitor and report on the:

(i) impacts and environmental performance of the development;

(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;

(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;

(f) a program to investigate and implement ways to improve the environmental performance of the development over time;

(g) a protocol for managing and reporting any:

(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);

(ii) complaint;

(iii) failure to comply with statutory requirements; and

(h) a protocol for periodic review of the plan.

Note: *The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans*

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

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.

C3. As part of the CEMP required under condition C2 of this consent, the Applicant must include the following:

(a) Construction Traffic Management Plan (see condition B12);

(b) Erosion and Sediment Control Plan (see condition B16);

(c) Unexpected Contamination Procedure (see condition B37).

C4. The Applicant must:

(a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and

(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.

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

C5. The Applicant must prepare an Operational Environmental Management Plan (OEMP) in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.

C6. As part of the OEMP required under condition C5 of this consent, the Applicant must include the following:

(a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;

(b) describe the procedures that would be implemented to:

(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;

(ii) receive, handle, respond to, and record complaints;

(iii) resolve any disputes that may arise;

(iv) respond to any non-compliance;

(v) respond to emergencies; and

(c) include the following environmental management plans:

(i) Waste Management Plan (see condition B7);

(ii) Operational Traffic Management Plan (see condition B14);

(iii) Air Quality Management Plan (see condition B23);

C7. The Applicant must:

(a) not commence operation until the OEMP is approved by the Planning Secretary; and

(b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).

REVISION OF STRATEGIES, PLANS AND PROGRAMS

C8. Within three months of:

(a) the submission of an incident report under condition C11;

(b) the submission of an Independent Environmental Audit under condition C16;

(c) the approval of any modification of the conditions of this consent; or

(d) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review,

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.

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.

Note: *This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.:*

REPORTING AND AUDITING

Incident Notification, Reporting and Response

C11. The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au 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.

Non-Compliance Notification

C12. The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.

C13. A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

C14. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

Annual Review

C15. Within three months after the first year of commencement of operation, and in the same month each subsequent year (or such other timing as may be agreed by the Planning Secretary), the Applicant must submit a report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. The review must:

(a) describe the development that was carried out in the previous year, and the development that is proposed to be carried out in the current year;

(b) include a comprehensive review of the monitoring results and complaints records from the previous year, including a comparison of these against the:

(i) relevant statutory requirements, limits or performance measures/criteria;

(ii) requirements of any plan or program required under this consent;

(iii) monitoring results of previous years; and

(iv) the relevant predictions in the EIS, Response to Submissions;

(c) identify any non-compliances and any incidents which occurred over in the previous year, and describe what actions were (or are being) taken to rectify the non-compliance or incident and avoid recurrence;

(d) identify any trends in the monitoring data over the life of the development;

(e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and

(f) describe what measures will be implemented over the next year to improve the environmental performance of the development.

Independent Environmental Audit

C16. Within one year of the commencement of operation, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the development. Audits must:

(a) be led and conducted by a suitably qualified, experienced and independent team of experts;

(b) be carried out in consultation with the relevant agencies;

(c) assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any strategy, plan or program required under this consent;

(d) review the adequacy of any approved strategy, plan or program required under this consent; and

(e) recommend measures or actions to improve the environmental performance of the development, and any strategy, plan or program required under this consent.

C17. Within three months of commissioning an Independent Environmental Audit, or within another timeframe agreed by the Planning Secretary, a copy of the audit report must be submitted to the Planning Secretary and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Planning Secretary.

Note: *The audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Planning Secretary.*

Monitoring and Environmental Audits

C18. Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification and independent environmental auditing.

Note: *For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.*

ACCESS TO INFORMATION

C19. At least 48 hours before the commencement of construction and for the life of the development, the Applicant must:

(a) make the following information and documents (as they are obtained or approved) publicly available on its website:

(i) the documents referred to in condition A2 of this consent and the final layout plans for the development;

(ii) all current statutory approvals for the development;

(iii) all approved strategies, plans and programs required under the conditions of this consent;

(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;

(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;

(vi) a summary of the current stage and progress of the development;

(vii) contact details to enquire about the development or to make a complaint;

(viii) a complaints register, updated monthly;

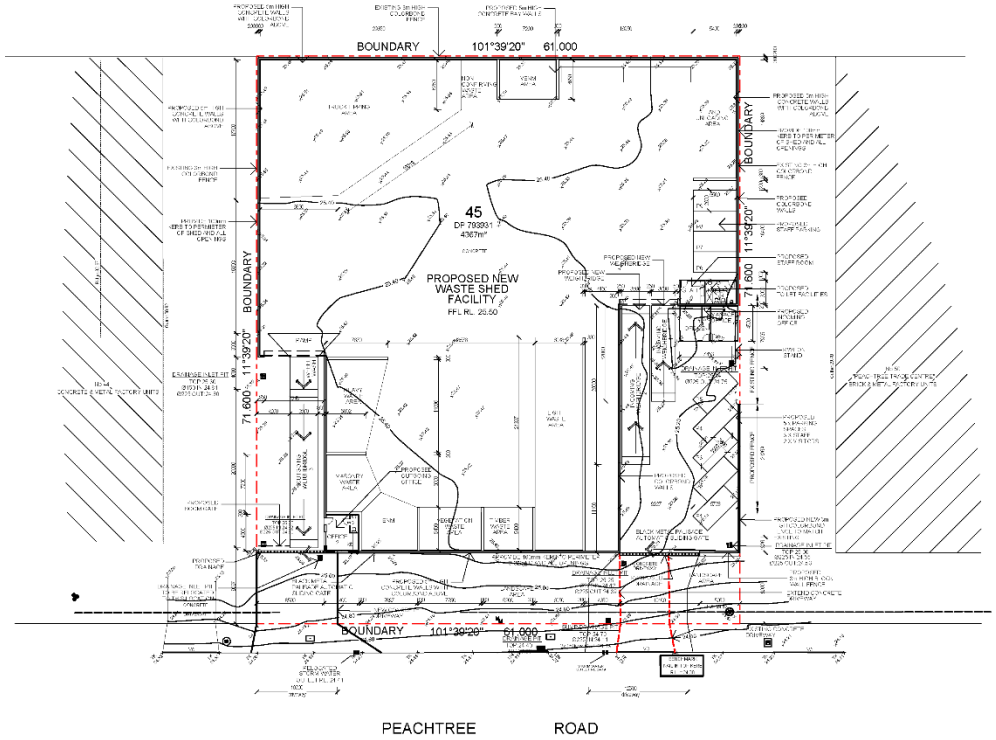
(ix) the Compliance Reporting of the development;

(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;

(xi) any other matter required by the Planning Secretary; and

(b) keep such information up to date, to the satisfaction of the Planning Secretary.

APPENDIX 1 DEVELOPMENT LAYOUT PLANS



01 PROPOSED SITE PLAN
SCALE 1:500

REFERENCES

NOTES

Rev.	Date	Description
C	18.10.18	GENERAL AMENDMENTS
B	03.10.18	GENERAL AMENDMENTS
A	28.09.18	DA SUBMISSION

Drawn @ A3 — 5 10 15 20
0 1:500 at A3

CDA ARCHITECTS
LEVEL 2, 66 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.cdaarchitects.com.au

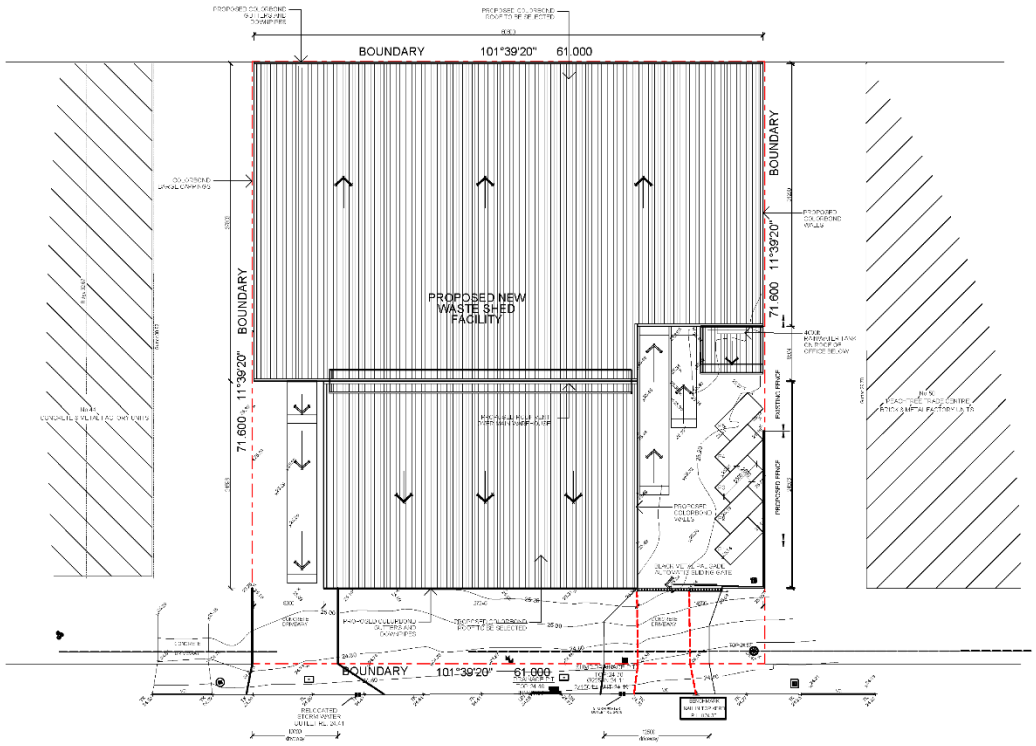
PROJECT
PROPOSED
WASTE MANAGEMENT FACILITY

48 PEACHTREE ROAD, PENRITH
NSW 2750

Drawing title
PROPOSED SITE PLAN

Job no.	Drawing no.	Rev.
J17401D	A103	C

Drawn by	Checked by	Approved by	Date
LW	JY	JY	APR 2017



01 PROPOSED ROOF PLAN
SCALE 1:500

REFERENCES

NOTES

A 29.06.18 DA SUBMISSION
Rev. Date Description

Scale
m 0 5 10 15 20
1:500 at A3

Project Architect
CDA ARCHITECTS
LEVEL 2, 60 PARK STREET
SYDNEY NSW 2000
P: 02 8267 2900
W: www.cdarchitects.com.au

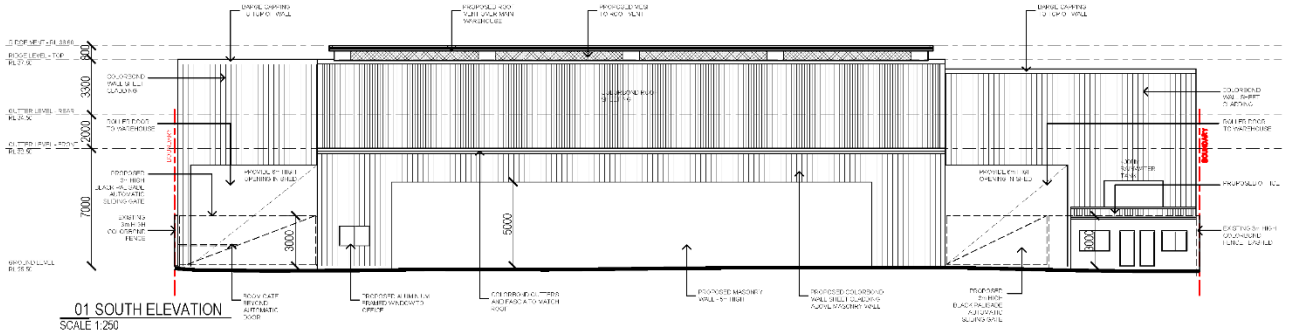
Project
PROPOSED
WASTE MANAGEMENT FACILITY

45 PEACHTREE ROAD, PENRITH
NSW 2750

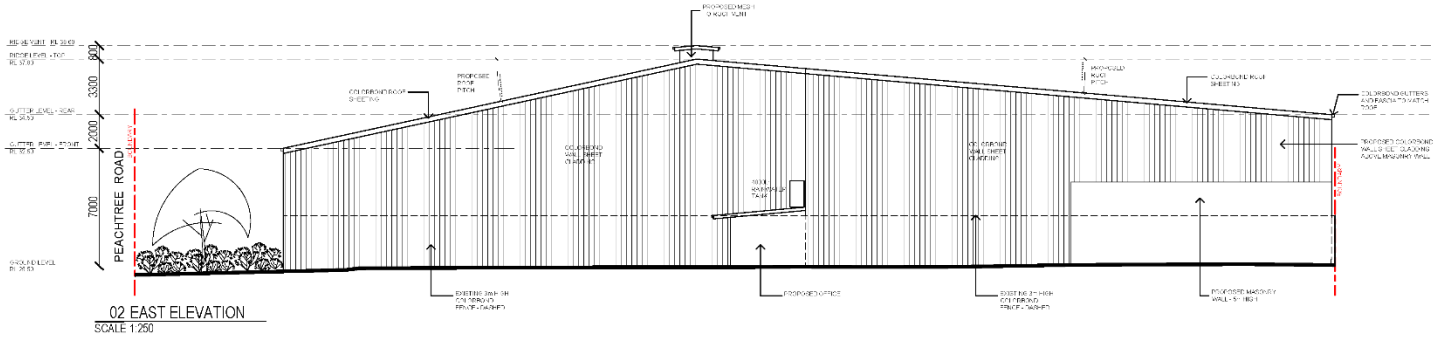
Drawing title
PROPOSED ROOF PLAN

Job no.	Drawing no.	Rev.
J17401D	A104	A

Drawn By	Checked By	Approved By	Date
LW	JY	JY	APR 2017



01 SOUTH ELEVATION
SCALE 1:250



02 EAST ELEVATION
SCALE 1:250

REFERENCES

NOTES

DO NOT SCALE DRAWINGS

Rev.	Date	Description
B	03.10.18	GENERAL AMENDMENTS
A	28.06.18	DA SUBMISSION

Scale
m 0 2.5 5 7.5 10
0 1:250 at A3

Project Architect
CDA ARCHITECTS
LEVEL 2, 60 PARK STREET
SYDNEY NSW 2000
P: 02 8267 2900
W: www.cdarchitects.com.au

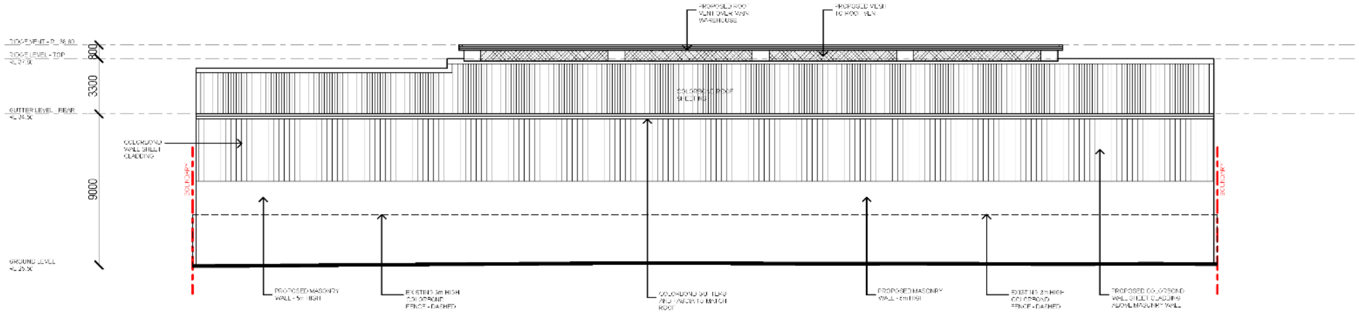
Project
PROPOSED
WASTE MANAGEMENT FACILITY

46 PEACHTREE ROAD, PENRITH
NSW 2750

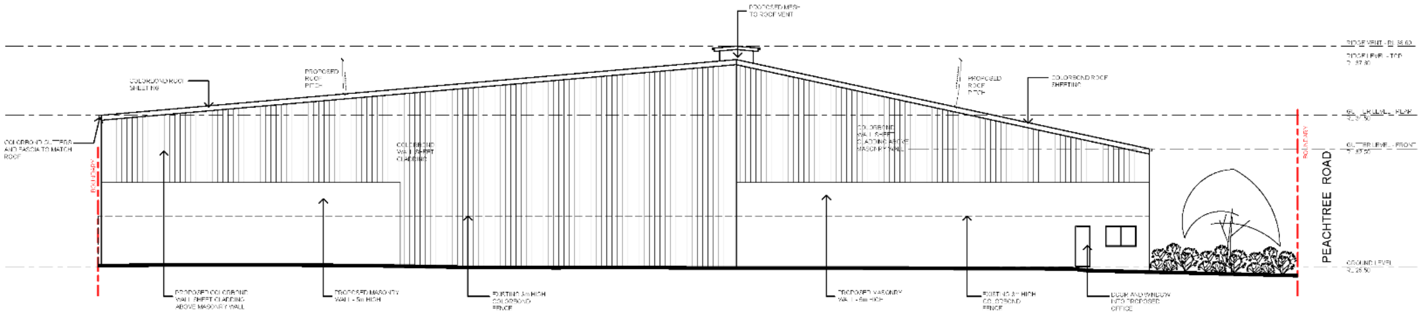
Drawing title
SITE ELEVATION 1

Job no.	Drawing no.	Rev.
J17401D	A104	B

Drawn By	Checked By	Approved By	Date
LW	JY	JY	APR 2017



03 NORTH ELEVATION
SCALE 1:250



04 WEST ELEVATION
SCALE 1:250

Rev.	Date	Description
B	03.10.18	DA SUBMISSION
A	28.06.18	DA SUBMISSION

Scale 1:250 at A3

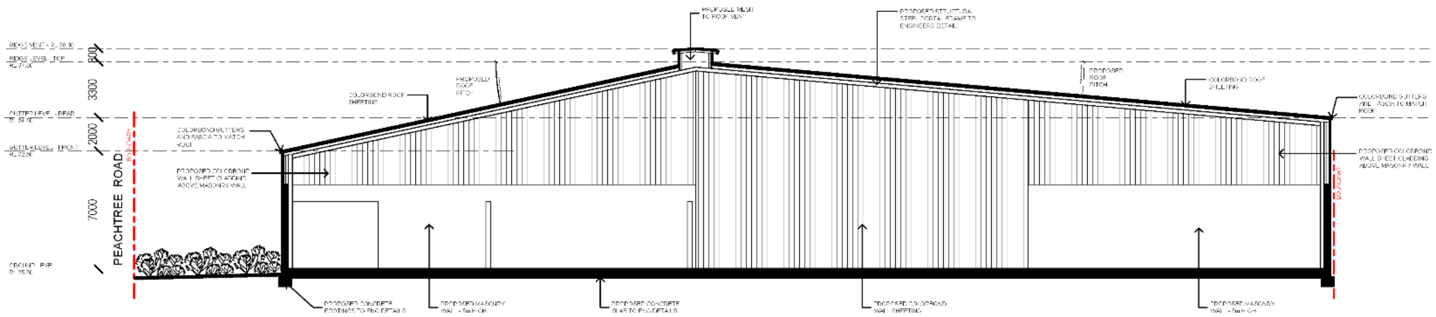
Project Architect
CDARCHITECTS
LEVEL 2, 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.cdarchitects.com.au

Project
PROPOSED WASTE MANAGEMENT FACILITY
46 PEACHTREE ROAD, PENRITH NSW 2750

Drawing title
SITE ELEVATION 2

Job no.	Drawing no.	Rev.
J17401D	A104	B

Drawn by	Checked by	Approved by	Date
LW	JY	JY	APR 2017



02 SECTION AA
SCALE 1:250

REFERENCES

NOTES

Rev.	Date	Description
A	28.06.18	DA SUBMISSION

Scale 1:250 at A3

Project Architect

CDARCHITECTS

LEVEL 2, 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.cdarchitects.com.au

Project
PROPOSED WASTE MANAGEMENT FACILITY

46 PEACHTREE ROAD, PENRITH
NSW 2750

Drawing title
SITE ELEVATION

Job no.	Drawing no.	Rev.
J17401D	A104	A

Drawn by	Checked by	Approved by	Date
LW	JY	JY	APR 2017

Planting schedule				
Species	Common name	Maximum height	Planting	Pot size
Eucalyptus tereticornis	Forest red gum	30 m	Plant three trees either side of entrance	45 L
Grevillea	Boongala spinebill	2 m	2 m spacing along shed	5 L
Lomondra longifolia	-	1.5 m	Plant at 0.5 m spacing with mulching	Growth tube

EMM

Landscape plan
Penrith Waste Recycling and Transfer Facility
Response to Submissions
Appendix J

APPENDIX 2 APPLICANT'S MANAGEMENT AND MITIGATION MEASURES

Key issue	Management measure
Air quality	The CEMP will include the following air quality management measures: • 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; • 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. The OEMP will include an air quality management plan (AQMP) that will detail the implementation of the following air quality management measures: • misters will operate at the shed's vehicle ingress and egress points; • misters will operate at the southern stockpile area; • the entire site will be sealed (as it is already) except for the landscaped verge along Peachtree Road; and • a wheel wash will be used to clean truck tyres to prevent mud or sediment being carried to and deposited on public roads. The OEMP will include the following management measures to prevent odour emissions from the site: • putrescible waste will not be accepted on site; • odorous materials will not be accepted on site; • garden waste will be dispatched to another facility licensed to accept it, as • soon as there is enough to fill a dispatch vehicle, or if the material starts to • compost (whichever is sooner); and • no composting will be undertaken on site, as verified by daily infrared, visual and odour testing as outlined in Section 4.1.12iic.

Key issue	Management measure
Greenhouse gases	The CEMP and OEMP will include the following management measures to prevent/minimise greenhouse gas emissions associated with the site: • on-site equipment will be regularly maintained and serviced to maximise fuel efficiency; • vehicle kilometres travelled on site will be minimised; and • energy efficiency will be progressively reviewed and implemented throughout the life of the facility.
Noise	The CEMP will include the following management measures to minimise noise impacts: • 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; • plant and equipment will be regularly maintained and serviced and operated in the quietest and most efficient manner; • concurrent plant operation will be minimised as practical; • vehicle and plant reversing will be minimised as practical; • use of amplified devices for communication (eg public address systems or similar) will be minimised as practical; • use of equipment that generates impulsive noise will be avoided, as practical; • work will be scheduled to coincide with non-sensitive periods, as practical; • neighbouring businesses will be informed of construction dates and • provided contact details for the site manager for questions or complaints; and • noise mitigation measures will be regularly enforced (eg toolbox talks). The OEMP will include the following management measures to minimise noise impacts: • material sorting will not take place on public holidays, Sundays or before 7 am on Saturdays; • noisy activities and adoption of improvement techniques will be identified; • the movement of materials and plant and unnecessary metal-on-metal contact will be minimised; • material drop heights and the dragging of materials will be minimised; • quieter plant and equipment will be chosen based on the optimal power and size to most efficiently perform the required tasks; • plant and equipment will be operated in the quietest and most efficient manner; • plant and equipment will be regularly inspected and maintained to minimise noise and vibration, and to ensure that all noise and vibration reduction devices are operating efficiently; • noise-related complaints will be handled promptly; and • a complaints register will be maintained.

Key issue	Management measure
Visual	Prior to the commencement of operations: • the street verge along Peachtree Road will be landscaped as outlined at Appendix J. Minor amendments may be required as per the outcomes of detail design and service requirement; • the new shed will be painted; and • new walls and automated gates will be installed. The OEMP and CEMP will require the site's frontage be kept tidy and litter free. The OEMP will include a management plan for the landscaped area of the site.
Water	The CEMP will include the following management measures to mitigate water related impacts: • existing drainage systems will be cleaned before commencement of construction; and • 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. The following infrastructure will be constructed prior to the commencement of operation, as outlined in appendix E: • grated permitter drainage lines will be installed at the entrance and exit driveways; • runoff sediment traps will be cleaned and installed; • drainage infrastructure will be relocated and/or upgraded to accommodate a 10-year ARI event; • a 4,000 L rainwater tank will be installed; • water efficient fixtures will be installed in the amenity area. The OEMP will include the following management measures to minimise water impacts: • the shed's guttering system will be inspected on an annual basis to remove accumulated debris; • the rainwater tank will be inspected on a six-monthly basis for structural integrity; • drainage inlet pit sediment traps will be inspected on a monthly basis and cleared as necessary; • the drainage system will be inspected on a six-monthly basis and cleared to remove accumulated materials; • driveways will be swept and cleaned daily; • groundwater will not be used; • a water management plan will be prepared that will outline the procedures and duration for the monitoring of relevant water quality aspects (eg turbidity and nutrients), including trigger values and responses and contingency measures.

Key issue	Management measure
Contamination	The CEMP will include the following management measures to mitigate potential contamination impacts: • 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. • 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. • Removed sections of the slab will be backfilled with VENM and resealed. • During the initial construction stage, section of the slab will be progressively bunded, 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. • 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 for staining and odours when excavating. Contractors will also use a photoionization detector during excavations so volatile organic compounds (petroleum hydrocarbons) can be assessed.
Diesel spill	The OEMP will include the following management measures to minimise impacts associated with a diesel spill: - diesel will be supplied to mobile plant by an appropriately licensed and qualified on-site refuelling contractor using a mini-tanker; - refuelling and emergency spill response activities will be detailed; and - there will be a diesel spill kit stored within the shed.
Traffic and vehicle movement	The CEMP will include a driver code of conduct will outline that will outline processes for minimising road traffic noise. Prior to the commencement of operations, car parking will be provided as per the plans at Appendix A. The OEMP will include an operational traffic management plan that will: • restrict queuing or parking of vehicle on Peachtree Road; • outline routes for light and heavy vehicles, including restricting access for heavy vehicles from the west of the site; • detail on-site measures to control the movements of light and heavy vehicles into, within and out of the site; • detail the responsibilities of traffic controller on site; and • detail parking and stopping arrangements within the site (eg the requirements for the circulation, truck tipping, hand unloading and car parking areas).

Noise monitoring and assessment locations
Penrith Waste Recycling and Transfer Facility
Noise Imapct Assessment
Figure 1

Figure 1: Locations of sensitive receivers

APPENDIX 3 INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS

WRITTEN INCIDENT NOTIFICATION REQUIREMENTS

1. A written incident notification addressing the requirements set out below must be emailed to the Department at the following address: compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition C11 or, having given such notification, subsequently forms the view that an incident has not occurred.
2. Written notification of an incident must:
   a. identify the development and application number;
   b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
   c. identify how the incident was detected;
   d. identify when the applicant became aware of the incident;
   e. identify any actual or potential non-compliance with conditions of consent;
   f. describe what immediate steps were taken in relation to the incident;
   g. identify further action(s) that will be taken in relation to the incident; and
   h. identify a project contact for further communication regarding the incident.
3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.
4. The Incident Report must include:
   a. a summary of the incident;
   b. outcomes of an incident investigation, including identification of the cause of the incident;
   c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
   d. details of any communication with other stakeholders regarding the incident.

APPENDIX C – WASTE MANAGEMENT AND MONITORING PLAN

WASTE MANAGEMENT AND MONITORING PLAN

PENRITH WASTE RECYCLING AND TRANSFER FACILTY

March 2021

Document Control				
Rev No	**Date**	**Revision Details**	**Author**	**Reviewer**
1	4/12/20	Draft	EM	ED
2	22/02/21	Draft update	EM	IS

CONTENTS

1. INTRODUCTION

1.1 BACKGROUND

Benedict Recycling Pty Ltd (Benedict) is the operator of the Penrith waste recycling and transfer facility (the facility) at 46-48 Peachtree Road, Penrith (the site).

This document is a waste management and monitoring plan (WMMP) for the facility required by Condition B7, B8 & B9 of the Stage significant development (SSD) consent (Ref: SSD 7733) (the consent).

The consent was originally approved on 15 May 2020 for construction and operation of a resource recovery facility to process up to 180,000 tonnes per annum (tpa) of general solid waste (non-putrescible).

1.2 LOCATION

The site is in the local government area (LGA) of Penrith, NSW. The legal description of the site is Lot 45 DP 793931 and it is approximately 4,367 m^2 in size. The site is amongst the Penrith industrial precinct. A site location plan and a site layout plan are provided in Figures 1.1 and 1.2, respectively.

1.3 PURPOSE OF THE WASTE MANAGEMENT PLAN

The purpose of this WMMP is to meet the requirements of the consent as outlined in Table 2.1.

Table 2.1 – Compliance table (SSD 7733)

Condition	Requirement	Where Addressed in WMP
A6	**LIMITS OF CONSENT** The only type of waste permitted to be received or processed at the site is waste classified as general solid waste (non-putrescible).	Section 2 and Table 2.1
A7	The Applicant must not: (a) receive or process more than 180,000 tonnes of general solid waste (non-putrescible) per year; and (b) store more than 1,600 tonnes of general solid waste (non-putrescible) at any one time.	Section 2.2
A8	Stockpiles of processed and/or unprocessed waste on site must not be more than 5 metres in height when measured from the finished ground level of the site.	Section 2.3 and Table 2.3
A12	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	Section 4

Condition	Requirement	Where Addressed in WMP
A13	**REQUEST FOR INFORMATION** The Applicant must retain all weighbridge records as required by the POEO (Waste) Regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Planning Secretary and/or EPA.	Section 4
A14	The Applicant must retain all weighbridge records as required by the NSW Protection of Environment and Operation (Waste) Regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Secretary and/or the EPA.	Section 5.1
A15	The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the development. The waste classification records must be made immediately available on request by the EPA and/or the Planning Secretary.	Section 5.1
B1	**WASTE MANAGEMENT** All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Section 5.2
B2	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by an EPL. No putrescible waste may be received, stored or processed on site.	Section 2
B4	**Receipt, Storage and Handling of Waste** The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the EPA's Waste Classification Guidelines Part 1: Classifying Waste, November 2014, or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.	Section 2
B5	All waste must be stored wholly within the designated waste storage areas.	Section 3
B6	All waste must be loaded and unloaded within the designated loading and unloading areas.	Section 3

Condition	Requirement	Where Addressed in WMP
B7	**Operational Waste Management Plan** Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan (WMP) for the development, to the satisfaction of the Planning Secretary. The WMP must form part of the OEMP required by condition C5 and must: (a) detail the type and quantity of waste to be generated during operation of the development; (b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the POEO Act, the POEO (Waste) Regulation, 2014 and the EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014); (c) include details of the waste stockpile limits in the raw feed and finished product storage areas; (d) include procedures for ensuring no build-up of waste will occur in the raw feed waste stockpile area during unexpected machinery breakdown (e) detail the requirements for non-conforming waste handling and removal; and (f) include details of how the site is consistent with the Standards for managing construction waste in NSW including staff training.	This document
B8	The Applicant must: (a) not commence operation until the WMP is approved by the Planning Secretary; and (b) implement the most recent version of the WMP approved by the Planning Secretary.	Noted
B9	**Waste Monitoring Plan** From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development. The program must: (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; (b) include suitable provisions to monitor the:	Section 5

Condition	Requirement	Where Addressed in WMP
	(i) quantity, type and source of waste received on site; and (ii) quantity, type and quality of the outputs produced on site; and (c) ensure that: (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	
B31	**Hazardous waste** The Applicant must implement auditable procedures to handle and dispose of hazardous waste materials such as asbestos, sharps and chemical/biological materials that have been received on site.	Section 4 and Attachment A
C1	**Management Plan Requirements** Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: (a) detailed baseline data; (b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (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; (c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; (d) a program to monitor and report on the: (i) impacts and environmental performance of the development; (ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	This document

Condition	Requirement	Where Addressed in WMP
	(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; (f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; and (h) a protocol for periodic review of the plan. Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	
C6	**OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN** As part of the OEMP required under condition C5 of this consent, the Applicant must include the following: (a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (b) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and	This document

Condition	Requirement	Where Addressed in WMP
	(c) include the following environmental management plans: (i) Waste Management Plan (see condition B7); (ii) Operational Traffic Management Plan (see condition B14); (iii) Air Quality Management Plan (see condition B23);	

Figure 1.1 – Site location plan

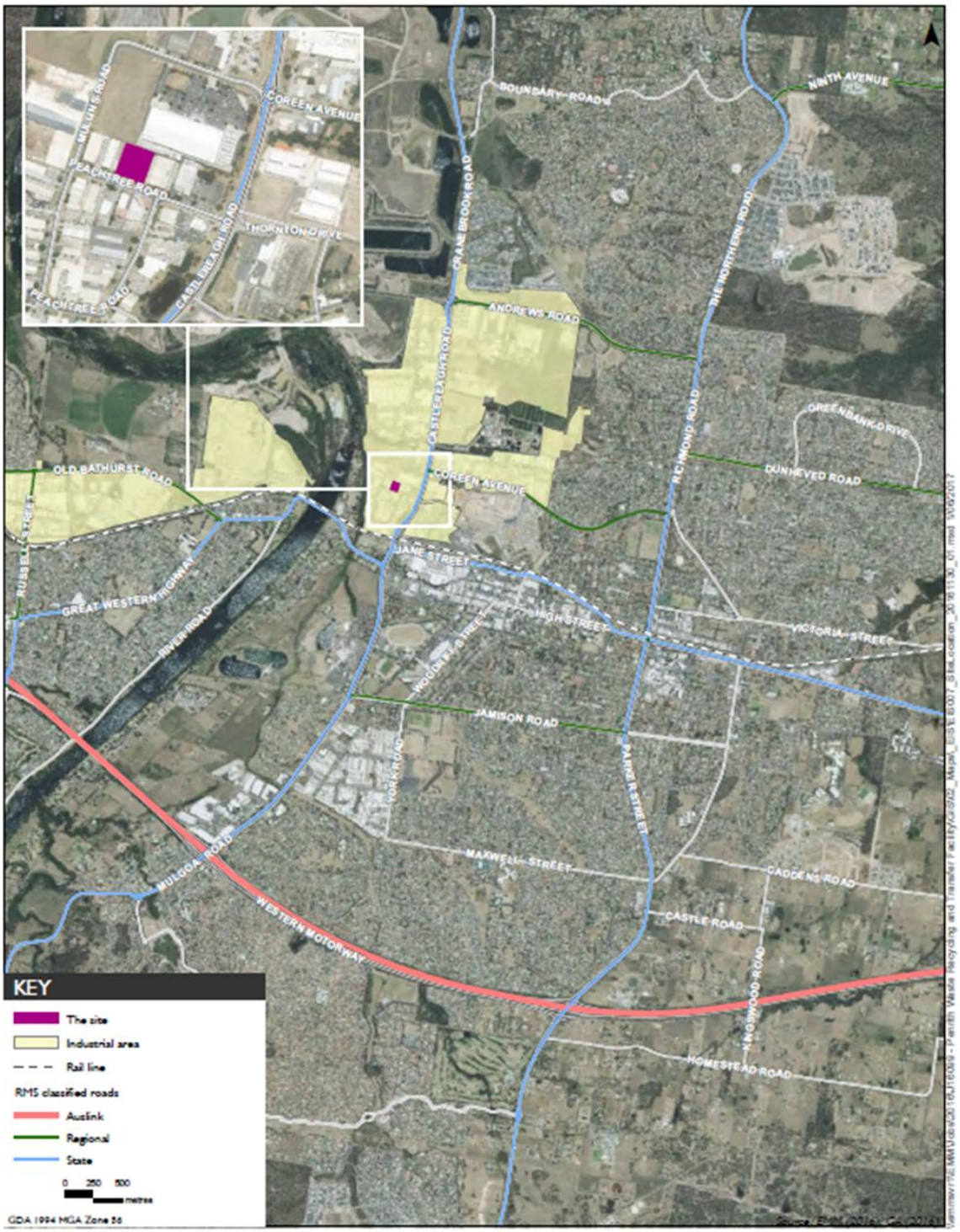
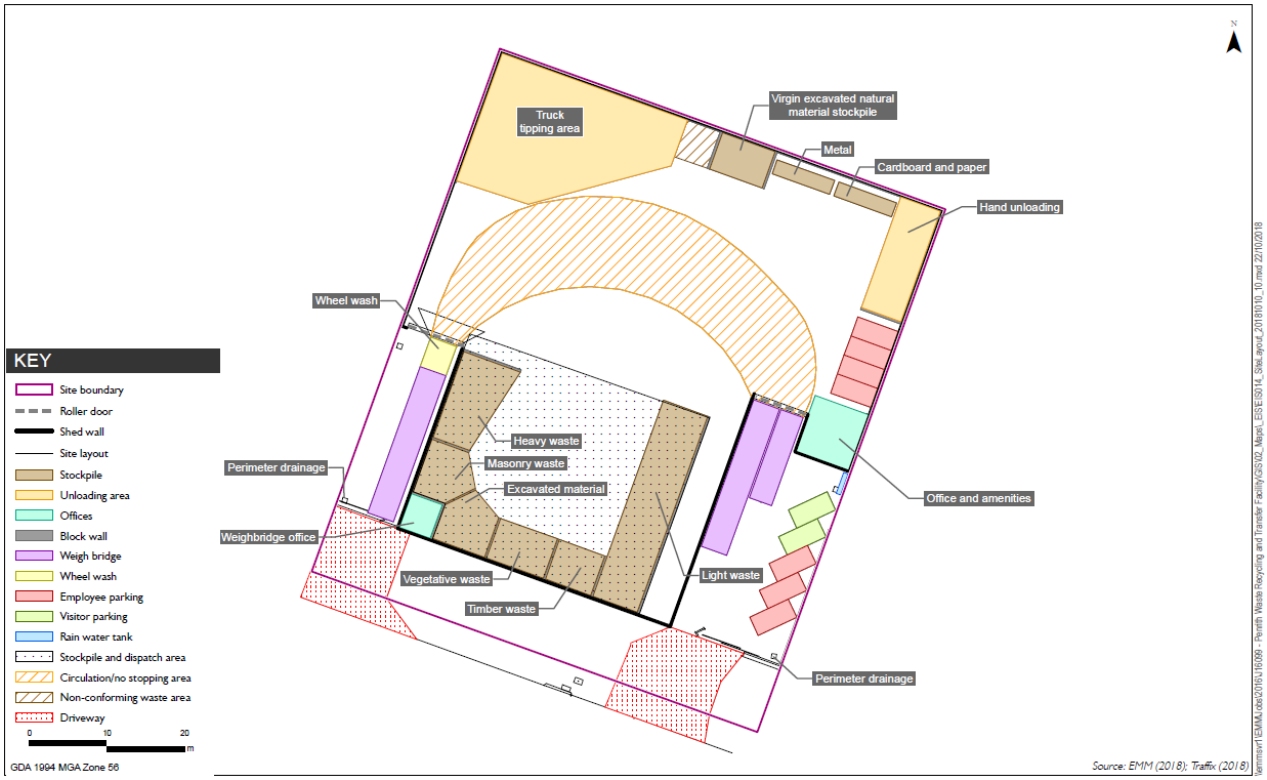


Figure 1.2 – Site layout plan



2. WASTE TYPES AND QUANTITIES

Only 'pre-classified general solid waste (non-putrescible) waste' as defined by the NSW Environment Protection Authority's (EPA) *Waste Classification Guidelines - Part 1: Classification of Waste* (the guidelines) are to be accepted by the facility. No special, liquid, hazardous, restricted solid waste or general solid waste (putrescible), as defined by the guidelines, are to be accepted.

The sources and types of wastes will vary. Waste types are provided in Table 2.2.

All of the materials brought onto the site are to be taken from the site as products, as recyclable materials requiring further processing, or as non-recyclable residues (e.g. rubbish or spoiled recyclables such as contaminated paper/cardboard) for disposal at an EPA licensed landfill.

Table 2.2 – Materials to be accepted by the facility

Waste types
Excavated natural material that meet the CT1 thresholds for General Solid Waste in Table 1 of the guidelines
Soils that meet the CT1 thresholds as per the guidelines
Virgin excavated natural material (VENM)
Asphalt waste
Building and demolition waste
Cement fibre (no asbestos)
Concrete, excavated materials, bricks, and spoils ('fines' with a particle diameter of less than 8 mm)
Concrete waste from a batch plant

Timber waste (as defined by building and demolition waste) and wood waste
Glass, plastic, rubber, plasterboard, ceramics, bricks, concrete or metals
Household waste, including municipal clean-up waste (no food waste)
Garden waste
Electronic waste
Paper or cardboard
Rail Ballast
Tyres (no whole loads – no more than 2 tonnes stored onsite)
Grit, sediment, and gross pollutants from stormwater treatment devices/management systems that have been dewatered

2.1 SITE BASED WASTE ACTIVITIES

The NSW *Protection of the Environment Operations Act 1997* (POEO Act) requires companies or organisations carrying out activities that have a potential to affect the environment to obtain an Environment Protection Licence (EPL) from the EPA.

The POEO Act 1997 Schedule 1, Part 1, Activities Premises Based, defines:

WASTE STORAGE

(1) This clause applies to waste storage, meaning the receiving from off site and storing (including storage for transfer) of waste.

(2) However, this clause does not apply to any of the following:
(a) the storage of stormwater,
(b) the storage of up to 60 tonnes at any time of any of the following kinds of waste (but not when accompanied by any other kind of waste)
(i) drilling mud
(ii) grease trap waste
(iii) waste lead acid batteries
(iv) waste oil
(c) the storage of sewage within a sewage treatment system,
(d) the storage and transfer of liquid waste that is generated and treated on site prior to sewer discharge, or lawful discharge to waters.

(3) The activity to which this clause is declared to be a scheduled activity if:
(a) more than 5 tonnes of hazardous waste, restricted solid waste, liquid waste or special waste (other than waste tyres) is stored on the premises at any time, or
(b) more than 5 tonnes of waste tyres or 500 waste tyres is stored on the premises at any time (other than in or in a vehicle used to transport the tyres to or from the premises), or
(c) more than the following amounts of waste (other than waste referred to in paragraph (a) or (b))are stored on the premises at any time:
(i) in the case of premises in the regulated area – more than 1,000 tonnes or 1,000 cubic metres,
(ii) in the case of premises outside the regulated area – more than 2,500 tonnes or 2,500 cubic metres, or
(d) more than the following amounts of waste (other than waste referred to in

paragraph (a) or (b)) is received per year from off site:
(i) in the case of premises in the regulated area – 6,000 tonnes
(ii) in the case of premises outside the regulated area – 12,000 tonnes.

(4) For the purposes of this clause, 1 litre of waste is taken to weigh 1 kilogram

RESOURCE RECOVERY

(1) This clause applies to the following activities:
***recovery of general waste,** meaning the receiving of waste (other than hazardous waste, restricted solid waste, liquid waste or special waste) from off site and its processing otherwise than for the recovery of energy*
***recovery of hazardous and other waste,** meaning the receiving of hazardous waste, restricted solid waste or special waste (other than asbestos waste or waste tyres) from off site and its processing, otherwise than for the recovery of energy*
***recovery of waste oil**, meaning the receiving of waste oil from off site and its processing, otherwise than for the recovery of energy*
***recovery of waste tyres,** meaning the receiving of waste tyres from off site and their processing, otherwise than for the recovery of energy.*

(2) However, this clause does not apply to the recovery of stormwater or the processing of any of the following:

(a) contaminated soil,
(b) contaminated groundwater,
(c) sewage within a sewage treatment system (whether or not that system is licensed).

(3) Each activity referred to in Column 1 of the Table to this clause is declared to be a scheduled activity if:

(a) it meets the criteria set out in Column 2 of that Table, and
(b) either

(i) less than 50% by weight of the waste received per year requires disposal after processing, or

(ii) an exemption granted under Part 9 of the Protection of the Environment Operations (Waste) Regulation 2014 exempts the person carrying out the activity from the requirements of section 48 (2) as they apply to waste disposal (application to land), waste disposal (thermal treatment), waste processing (non-thermal treatment) and waste storage.

Column 1		*Column 2*
ACTIVITY		***CRITERIA***
recovery of general waste		*if the premises are in regulated area:* *(a) involves having on site at any time more than 1,000 tonnes or 1,000 cubic metres of waste, or* *(b) involves processing more than 6,000 tonnes of waste per year*

		if the premises are outside the regulated area: *(a) involves having on site at any time more than 2,500 tonnes or 2,500 cubic metres, or* *(b) involves processing more than 12,000 tonnes of waste per year*
recovery of hazardous and other waste		*involves having on site at any time more than 200 kilograms of waste*
recovery of waste oil		*involves processing more than 20 tonnes of waste oil per year or having on site at any one time more than 2,000 litres of oil.*
recovery of waste tyres		*involves having on site at any time (other than in or on a vehicle used to transport the tyres to or from the premises) more than 5 tonnes of tyres or 500 waste tyres, or* *involves processing more than 5,000 tonnes of waste tyres per year.*

Benedict Recycling will apply for an EPL prior to the start of operations. It is noted that under Section 89K of the EP&A Act, an EPL cannot be refused if it is necessary for carrying out SSD that is authorised by a development consent.

2.2 QUANTITY OF WASTE TO BE RECEIVED/STORED

Condition A7 of the Consent limits the amount of general solid waste (non-putrescible) to be received or processed on site to no more than 180,000 tpa.

2.3 STOCKPILE LIMITS

Condition A8 of the Consent provides a maximum stockpile height of 5m.

Table 2.3 – Stockpile limits

Stockpile Type	Waste classification type	Maximum Stockpile volume
Heavy Waste	Building & Demolition waste	125 m^3
Masonry Waste area	Building & Demolition bricks, concrete and similar	125 m^3
Vegetation Waste area	Garden waste, wood waste, non-putrescible vegetative waste	75 m^3
Timber Waste area	Building & Demolition wood waste	75 m^3
Light Waste area	Mixture of general solid waste	450 m^3
Metals Bin	Building & Demolition metals	32 m^3
Cardboard Bin	Building & Demolition paper or cardboard	32 m^3
Excavated Material	Soils that meet general solid waste requirements	125 m^3
VENM	Virgin excavated natural material	50 m^3
Hand Unload Area	Mix of general solid waste (non – putrescible)	125 m^3
Truck Tipping Area	Mix of general solid waste (non- putrescible)	600 m^3
Non-Conforming waste bins*	Mixed demolition with a 20% combustible light weight component	5 m^3

*Non-conforming waste is not to be accepted. This is for small amounts that may be discovered.

In the case of incoming loads of mixed waste, a sorting process is necessary to separate the various recyclable materials. Given the variable pattern of incoming waste traffic, the primary focus of the operation is to prevent wastes that are not approved to be accepted from being accepted, to complete this sorting process as efficiently as possible, to avoid a backlog of trucks and to prevent the formation of a larger than necessary stockpile in the incoming waste receival area.

3. WASTE HANDLING/MANAGEMENT

Each load arriving at the facility is to be inspected and classified prior to the material being deposited on site. The methodology for waste load inspections is detailed and illustrated in the *Tip Inspecting Safe Work Procedure* attached in Attachment A.

All waste accepted shall be recorded on the facility's weighbridge system and a customer docket/receipt produced (see Attachment B).

The information recorded is to include:

- the date;
- vehicle registration number; and
- the type and weight of waste being delivered.

Incoming waste will be inspected at the weighbridge (and again after being tipped), see Section 4). Waste material that is unacceptable or specified prohibited from entering the site (see Attachment C) shall be refused entry and diverted to an appropriately licensed facility.

After leaving the weighbridge, each load is to be directed to the appropriate storage area by the site staff. All waste will be is unloaded within the designated unloading area and be stored wholly within the designated waste stockpile areas in accordance with Condition A7 of the consent. Wherever possible raw materials are to be sorted at the source and directed into segregated stockpiles on-site.

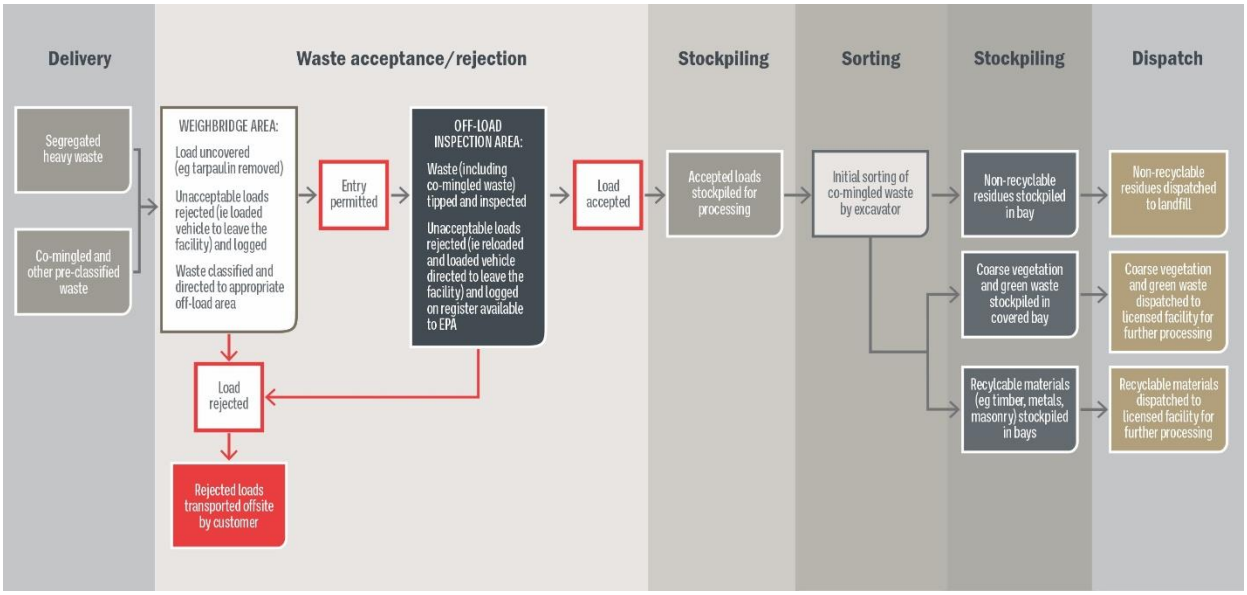
Unsorted materials are to be spread on the ground on-site, sorted into the various categories and formed into segregated stockpiles. The sorted waste material may be subject to processing depending on its category and presentation.

Processing on site may include screening and picking. The processed material is to be stockpiled into its various processed categories for return to the market as product(s).

In addition to waste received on site, waste generated on site both during construction works and resulting from general office activities is classified in accordance with the guidelines.

A flowchart outlining the key steps in the waste recycling and transfer process is provided in Figure 2.1 below.

Figure 2.1 – Waste flowchart



3.1 EQUIPMENT BREAKDOWNS

Unexpected mobile plant breakdown has the potential to result in waste sorting delays and hence build-up of incoming waste. To avoid such a situation, all mobile plant on site is to be regularly serviced and maintained (usually by the original equipment manufacturer) and the Benedict fleet of mobile equipment is typically replaced after approximately 10,000 hours of service. As such, equipment reliability is high and major breakdowns typically minimising the potential for excessive build-up of incoming waste on site.

Nevertheless, should an unexpected breakdown of mobile plant occur in the incoming waste receival area, replacement equipment is to be deployed when necessary to ensure that stockpile limits are not compromised due to a build-up of waste. This replacement mobile plant may be redeployed from another part of the site, hired or sourced from another Benedict site.

In the event that mobile equipment is unavailable for more than 48 hours due to breakdown, contractual arrangements are to be put in place whereby the original equipment manufacturer is bound to make available replacement equipment for use until such time as the repairs are completed.

Where high volumes of incoming waste traffic coincide with an equipment breakdown event and a build-up of waste is anticipated, the volume and types of waste received are to be managed accordingly to ensure that stockpile limits can continue to be met. This may include, but not be limited to, diverting customers to other facilities.

4. NON-CONFORMING WASTE

Incoming waste is to be inspected in the following two stages:

- a preliminary inspection of the incoming waste on the vehicle at the weighbridge; and
- an inspection of the incoming waste after it is tipped off but before it is added to the appropriate feed stockpile (the customer will be required to wait until the waste has passed the inspection).

Details of any non-conforming waste loads are to be captured on the 'Notification of Non-Conforming Waste Form' (refer Attachment D) which is to be sent to the customer and filed on site. A log of all non-conforming loads is to be maintained in a central register that is available for EPA inspection.

The information recorded in the form and register is to include the following:

- date;
- carrier organisation/company;
- registration number of the vehicle; and
- type of waste.

Arrangements are to be made for the removal of any non-confirming waste for disposal at an appropriately licensed facility.

Should an incident occur in relation to a non-conforming waste, which poses a threat to the environment, the EPA is to be advised as soon as practical after the incident occurs.

The incident is to be reported by telephoning:

- EPA Pollution Hotline: 131 555.

Benedict will charge a re-loading fee to customers that tip waste that is found to contain any materials that the facility is not licensed to accept (e.g. putrescibles, hazardous, liquid, and odorous waste). Benedict has found that customers who have a number of loads rejected and have to pay the re-loading fee, as a result of their rigorous inspection regime, stop using Benedict Recycling's facilities.

All staff directly involved in the inspection and classification of waste must be capable of identifying wastes that are not permitted to be disposed of at the facility. As such, basic internal training is to be carried out as required together with asbestos awareness training conducted by an external party which is scheduled annually as well as ad-hoc from time to time should there be any significant turnover of site staff.

5. WASTE MONITORING PROGRAM

Condition B9 of the consent requires that from the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development. The program must:

(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;

(b) include suitable provisions to monitor the:

(i) quantity, type and source of waste received on site; and

(ii) quantity, type and quality of the outputs produced on site; and

(c) ensure that:

(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and

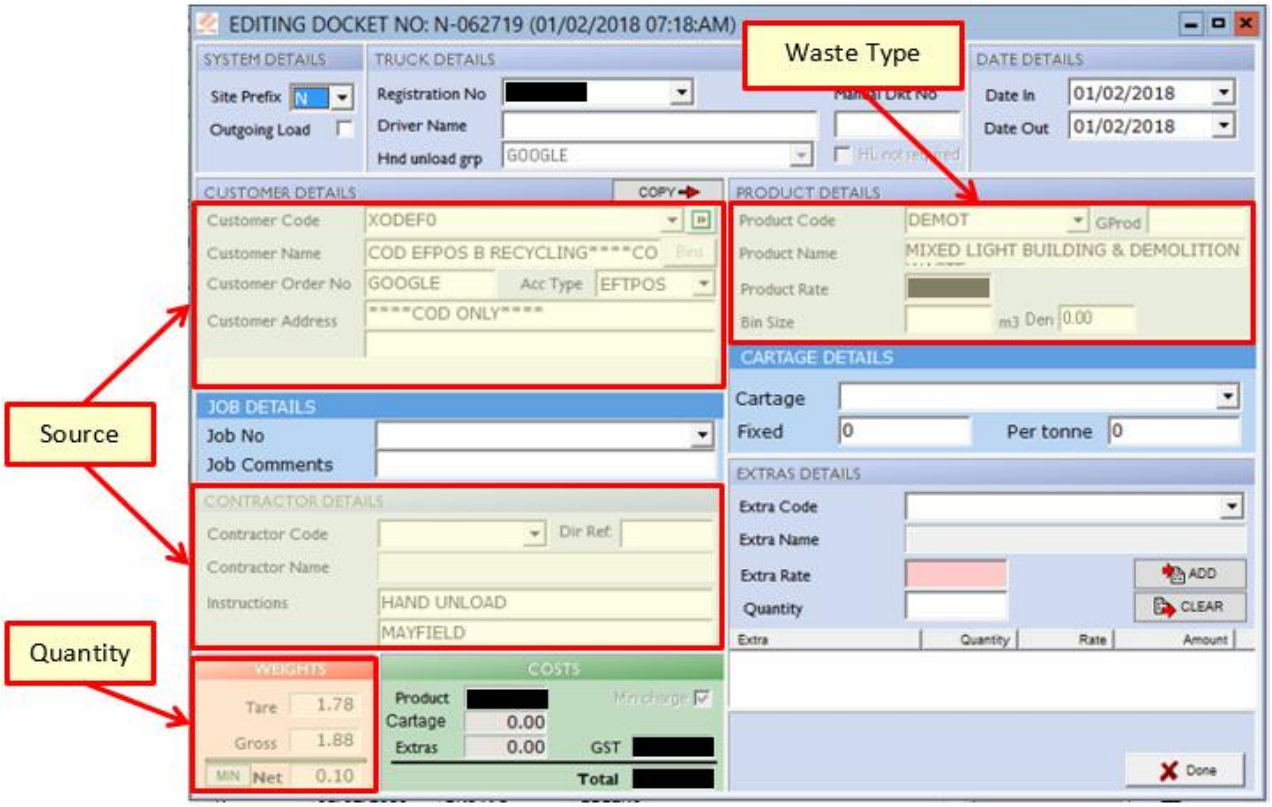
(ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos. a waste monitoring program be prepared by a suitably qualified person to:

Benedict is committed to minimising the risks associated with the waste received and the products despatched from the site by undertaking the waste monitoring program as outlined below. This process forms the waste monitoring program and was prepared by the Benedict Environmental Compliance Officer and will be reviewed and updated as required.

5.1 INCOMING WASTE RECEVIALS

The monitoring of the quantity, type and source of the waste received at the facility is to be recorded by the weighbridge software/system on a daily basis. An example of the information captured by the weighbridge software/system is shown in figure 5.1 below.

Figure 5.1 – Weighbridge information capture



Whilst the 'Customer Details', 'Truck Details' and 'Contractor Details' information is to be entered on arrival, the specific information relating to waste type is to be confirmed when the incoming load is inspected and classified using the 'Load Classification' form as shown in Attachment B. All necessary sampling and waste classification records will be in-line with any EPL requirements. Each incoming load is to be assigned a 'Product Code' which has an associated 'Product Name'.

5.2 OUTGOING PRODUCTS AND WASTE FOR DESPATCH

Materials leaving the site include:

- recycled products for re-use (compliant with Resource Recovery Orders);
- residual wastes to be further processed/lawfully recovered at a licensed waste facility; and
- residual wastes for disposal at a licensed waste facility.

The quantity, type and quality of the outputs produced on site are to be recorded by the same weighbridge software/system as that used to record incoming waste materials.

Recycled products for re-use are only to be approved for sale from the facility pending compliance with a variety of conditions as per specific Resource Recovery Orders issued by the EPA under clause 93 of the 2014 Waste Regulation.

5.3 MONTHLY EPA REPORTING

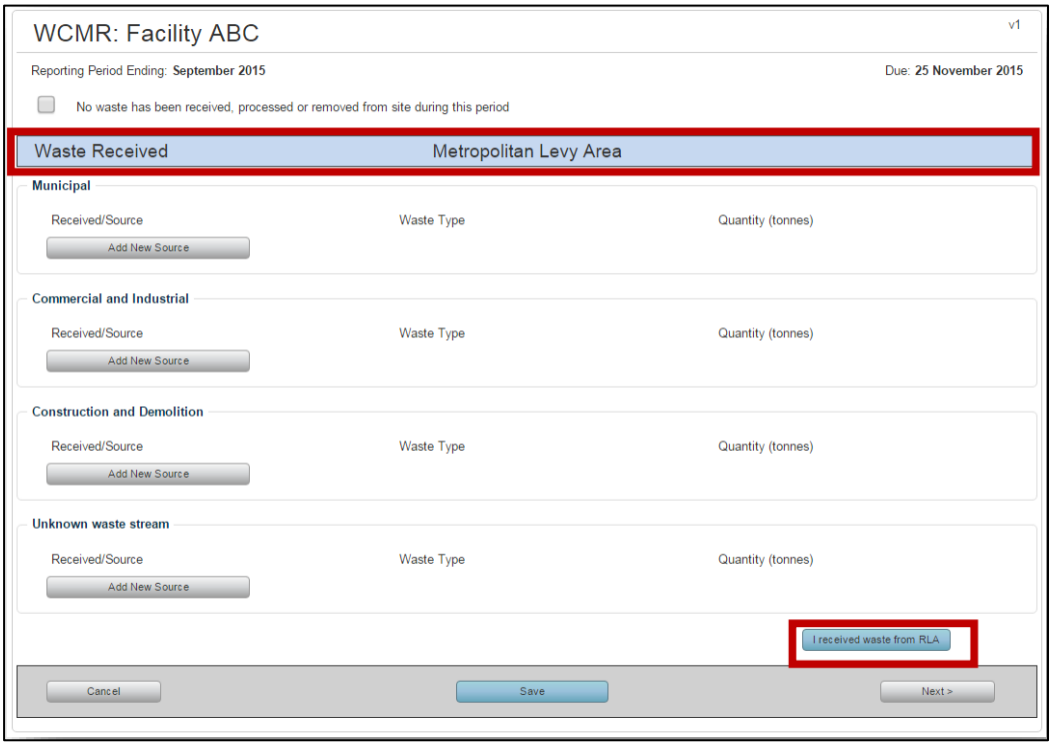
Under the POEO Act, all licence holders of levy liable waste facilities (i.e. landfills, waste recycling facilities, waste storage, and waste transfer facilities) must submit a Waste Contribution Monthly Report (WCMR). This report is submitted monthly on-line via the EPA's Waste and Resource Reporting Portal (WARRP), ensuring that there is suitable provision to monitor movement of waste to and from the premises.

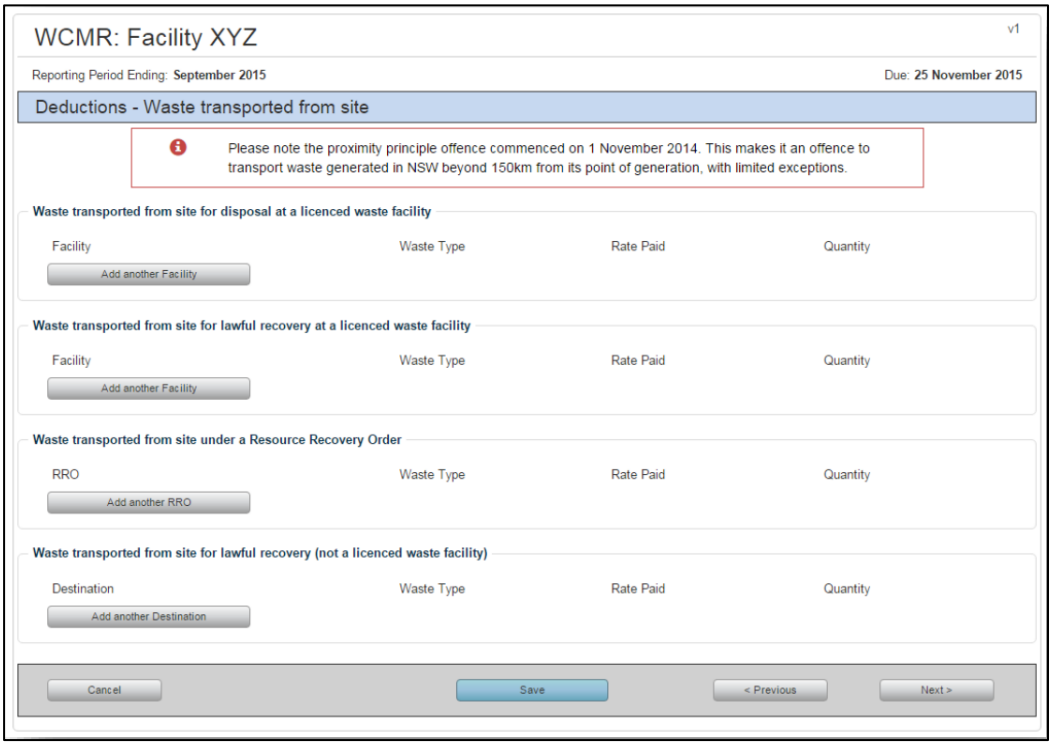
The WCMR submitted via the WARRP system details the quantity, type and source of waste received by a site as well as the quantity, type and quality of waste transported from the site.

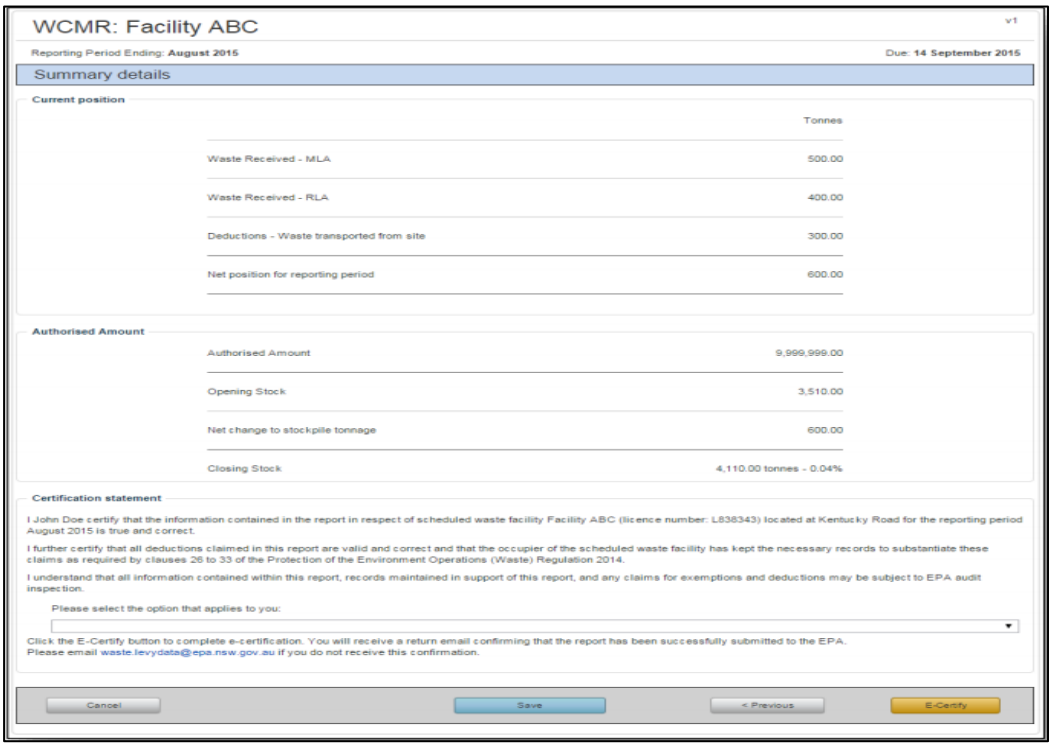
All sampling and waste classification data is to be retained for the life of the facility in accordance with EPA requirements.

Figure 5.3 below shows typical screenshots of the WARRP system being currently used to report waste material movements to and from the site.

Figure 5.3 – WARRP screenshots







WCMR: Facility ABC v1

Reporting Period Ending: **August 2015** Due: **14 September 2015**

Summary details

Current position

	Tonnes
Waste Received - MLA	500.00
Waste Received - RLA	400.00
Deductions - Waste transported from site	300.00
Net position for reporting period	600.00

Authorised Amount

Authorised Amount	9,999,999.00
Opening Stock	3,510.00
Net change to stockpile tonnage	600.00
Closing Stock	4,110.00 tonnes - 0.04%

Certification statement

I John Doe certify that the information contained in the report in respect of scheduled waste facility Facility ABC (licence number: L838343) located at Kentucky Road for the reporting period August 2015 is true and correct.

I further certify that all deductions claimed in this report are valid and correct and that the occupier of the scheduled waste facility has kept the necessary records to substantiate these claims as required by clauses 26 to 33 of the Protection of the Environment Operations (Waste) Regulation 2014.

I understand that all information contained within this report, records maintained in support of this report, and any claims for exemptions and deductions may be subject to EPA audit inspection.

Please select the option that applies to you:

Click the E-Certify button to complete e-certification. You will receive a return email confirming that the report has been successfully submitted to the EPA.
Please email waste.levydata@epa.nsw.gov.au if you do not receive this confirmation.

Cancel Save < Previous E-Certify

ATTACHMENT A: Tip Inspecting Safe Work Procedure

Tip Inspecting Safe Work Procedure (page 1 of 8)

SWP 5.4

BENEDICT

Tip Inspecting

Purpose:	To provide a detailed and illustrated methodology for tip inspecting.	
Applications:	Business Units	Benedict Recycling
	Department	Operations
	Plant	N/A
Exemptions:	N/A	
Documentation: Including permits, notifications and forms	Load Classification Form	

	Position	*Requirement*
Specific Competency Requirement:	Tip Inspector	Trained in this SWP
		Trained in Waste Identification
		Trained in Asbestos Awareness
		Trained in Site Traffic Management Plan
		Trained in Site Communication Protocols
		Trained in Site PPE requirements
		Trained in Overloaded Heavy Vehicle Procedure
		Completed Tip Inspector Competency

	Description	*Note*
Specialised Primary Equipment/ Plant/ Tooling		

Personal Protective Equipment required during the entire activity:

(When Required)

Tip Inspecting Safe Work Procedure (page 2 of 8)

SWP 5.4

BENEDICT

Tip Inspecting

STEP	TASK	ACTIVITY	POTENTIAL HAZARDS	CONTROLS/ PRECAUTIONS	ILLUSTRATIONS
1	Customer to stop at designated stop point	Weighbridge to notify to tip inspector when large numbers of pickups and tip offs are entering the site	Unfamiliar with site Collision	Driver Induction. Traffic management signage. Stop point area is to be kept clean at all times.	
		Weighbridge to notify tip inspector of driver with no access to UHF radio	Dust	Appropriate PPE to be worn. Dust suppression system to be periodically used when required.	
		Check truck/ vehicle condition	Slips, trips and falls Lack of communication	Trucks to untarp before entering tipping area.	
		Check drivers ticket for initial classification and verify	Driver on mobile phone Contaminated load	Verbal and visual contact made with customer driver and directions to tipping area given. Stop vehicle until driver is off the phone.	
		Tip inspector to check for visible contaminants		If load is deemed to be contaminated, report to supervisor/manager immediately.	
		Indicate to driver where to tip load		Collect ticket from driver. Do not allow any vehicle to enter the tipping area unless approved by a Benedict employee.	

Tip Inspecting Safe Work Procedure (page 3 of 8)

SWP 5.4

BENEDICT

Tip Inspecting

2	Customer tip off	Vehicle driving through tip off area Vehicle tipping off Inspect for contaminants Inspect for flammables Spread load when required	Too many vehicles/plant in tip area Collision Lack of communication Falling/ Rolling objects Vehicle tip over Dust Smouldering material/ Fire Crushing Unstable Vehicle Overloaded Vehicle Contaminated material	Tip inspector must communicate to machine operators in tip off area that the incoming vehicle is entering the area. Tip Inspector is not to let a vehicle enter the tip off area until responses from the area machine operators have been received. Ensure traffic management speed limits are followed. Limit vehicles in tipping area Signal driver to be positioned in areas of poor visibility, if required. Wear appropriate PPE – Gloves, dust mask, Hi Vis, Steel capped shoes, hearing protection, eye protection, sun protection and hard hat when required Ensure drivers tipping off are wearing appropriate PPE for the tipping area when out of their vehicle. Ground should be level and clear of debris. Spray down material with hose if dust is generated, or activate dust suppression system if available. No smoking in tip off area Use the appropriate firefighting equipment to extinguish a fire. If unable to control fire, notify warden of emergency. Stand well clear of falling objects. DO NOT stand immediately next to/ behind the skip bin/ tipping body during the tipping process, in case of vehicle roll over and/ or flying objects rolling out at speed. Do not inspect load whilst driver is tipping. Wait for bin to be back in travel position or a safe distance away from load on ground.	  

Tip Inspecting Safe Work Procedure (page 4 of 8)

SWP 5.4

Tip Inspecting

				For all skip bin trucks, ensure they have their stabilising legs down prior to tipping. Follow overloaded heavy vehicle procedure Do not allow drivers to tip on top of previously tipped loads, in case of potential reloading. For all Front lift trucks, waste is to be unloaded in a separate bay from all other waste streams. Material in this bay is to be lightly wet down on a regular basis after inspecting. Access to this area is to remain clear, as this material is removed off site on a First In, First Out basis. If contamination is present, report to supervisor/ manager immediately.	
3	Customer Hand Unload (where applicable)	Customer unloading vehicle/ trailer/ light truck Benedict employee assisting in unloading vehicle/ trailer/ light truck Benedict employee supervising customer unloading Inspect for contaminants	Too many vehicles/ plant in unload area Collision Lack of communication Falling/Rolling objects Flying objects Needles Sharp Objects Slips, Trips and Falls	Tip Inspector is not to let a vehicle enter the tip off area until area is free and clear of mobile plant. Customer vehicles are to wait in stop area until tip inspector directs them to enter tip off area. Ensure traffic management speed limits are followed. Verbal and visual contact made with customer driver and directions to tipping area consulted. Stand well clear of falling objects. DO NOT stand immediately next to/ behind the tipping body during the tipping process, in case of objects becoming airborne or rolling out at speed. Dust suppression system to be utilised periodically and when dust levels are elevated. Waste bays and access roads to be regularly maintained to ensure area is free and clear of debris and dust. DO NOT stand on waste stockpiles.	

Tip Inspecting Safe Work Procedure (page 5 of 8)

SWP 5.4

Tip Inspecting

		Lifting of Heavy/ Awkward objects Cuts/ Abrasions Dust inhalation Eye Irritation Noise Needles Contaminated material Driver Frustration Smouldering material/ Fire	Wear appropriate PPE – Dust mask, Hi Vis, Steel capped shoes, hearing protection, eye protection, sun protection and hard hat when required. Gloves to be worn whenever handling waste materials. Provide assistance where customer is attempting to unload a heavy/ awkward object. Where object is found to be too difficult/ heavy to unload, use available mechanical aids to assist. Customers are to wear enclosed footwear. Customer to wear hi visibility shirt/ vest. Where customer does not have appropriate PPE, where possible, provide assistance to customer to minimise exposure to potential hazards. No smoking in tip off area Use the appropriate firefighting equipment to extinguish a fire. If unable to control fire, notify warden of emergency. If contamination is present, report to supervisor/ manager immediately.	
4	Tip Inspector to inspect load	Assessing and Classifying load Fitness for duties Sun exposure Dust inhalation Eye Irritation Falling/ rolling objects	All relevant staff to attend asbestos awareness training. Tip inspectors trained in material classifications and identification. Tip Inspector to keep hydrated during the course of the shift. Wear appropriate PPE – Dust mask, Hi Vis, Steel capped shoes, hearing protection, eye protection, sun protection and hard hat when required. Gloves to be worn whenever handling waste materials. Dust suppression system/ water cart to be used when necessary.	

Tip Inspecting Safe Work Procedure (page 6 of 8)

SWP 5.4

Tip Inspecting

BENEDICT

		Flying objects	Watch where you're walking – looking out for sharp objects.
		Noise	Do not attempt to remove, touch or handle syringes. Cease inspection in the vicinity of any evidence of hazardous medical waste. Report incident to supervisor immediately.
			Tip inspector in control of traffic management.
			Be aware of position of excavators and loaders.
			Maintain positive radio/ visual communication with drivers/ operators in the area.
		Cuts/ abrasions	Wait for truck to completely stop and make reciprocated visual or radio contact with the vehicle driver prior to inspecting load on the vehicle.
		Sharp Objects	Do not climb on top of stockpiles.
		Needles	Extra attention is required when loads appear to be from an older building OR waste loads from a Front lift truck.
		Slips, trips, falls	If paints, oil, fuel, chemicals, food or putrescibles are detected or suspected, instruct material to be reloaded onto truck/vehicle. Use precautions to not allow uncontrolled release of liquids during the reloading process. Wet down area when complete.
		Collision	Photos taken of all non-recyclable/ contaminated loads sent to weighbridge for processing.
		Contaminated material	Load to be classified on the spot – driver told – and paperwork given.
		Driver Frustration	If contamination is present, report to supervisor/ manager immediately.
		Smouldering material/ Fire	Any disagreements on classification of waste with customer, tip inspector to escalate to site supervisor/ manager.

Tip Inspecting Safe Work Procedure (page 7 of 8)

SWP 5.4

Tip Inspecting

BENEDICT

				No smoking in tip off area Use the appropriate firefighting equipment to extinguish a fire. If unable to control fire, notify warden of emergency.	
5	Finding Contaminated Material	Bonded Asbestos Contaminated Material (ACM) found Report to supervisor/manager immediately	Dust Inhalation	Notify your supervisor/ manager immediately. If found immediately after tipping, instruct material to be reloaded onto truck. Use precautions to not allow dust to be generated during the reloading process. If found in stockpile, load is to be isolated, spread out and checked. Dust to be suppressed as outlined in asbestos awareness training. Asbestos handling material to be worn – e.g. P2 respirator and gloves if required. Asbestos material is to be double bagged in an approved asbestos bag and tied in a 'goose neck' position. Bags to be placed into an isolated area, to be sent away to a licenced waste facility.	
		Friable ACM found Report to supervisor/manager immediately	Dust Inhalation	Notify your supervisor/ manager immediately. Gloves and P2 dust mask to be worn Cordon off area. E.g. Bollards and tape, Cones, Barriers etc. Wet down material.	

Tip Inspecting Safe Work Procedure (page 8 of 8)

SWP 5.4

BENEDICT

Tip Inspecting

		Finding flammable material Report to supervisor/manager immediately	Smouldering material/ Fire	If flammable waste material is found, it is to be removed from the waste pile immediately and segregated from all other stockpiles. Wet down stockpiles where flammable materials were found Periodically wet down segregated flammable materials until removed from site.	
6	Releasing customer from tipping area		Impatient Driver Collision	No vehicle is to the leave the tipping area unless the tip inspector has signed and returned the classification docket to the driver. UHF radio communication between tip inspector and Benedict ground staff to inform of customer movements in shared yard areas.	

ATTACHMENT B: Load Classification and Customer Docket/Receipt

BENEDICT RECYCLING PTY LTD BENEDICT

LOAD CLASSIFICATION

DATE 4 AUG TIME REGO BV73JS

☐ BELROSE ☐ BANKSMEADOW ☐ CHIPPING NORTON

☑	LOAD	BIN SIZE
☑	DEMOLITION	1.5m
☐	BRICK / CONCRETE	
☐	CONCRETE - 500	ROSEBAY
☐	CONCRETE + 500	
☐	CLEAN FILL	
☐	RUBBLE	
☐	SAND (2.60)	
☐	SANDSTONE	
☐	STEEL	
☐	OTHER	

NON CONFORMING WASTE CHARGE ☐ YES ☐ NO

STAFF SIGNATURE

PRINT NAME:

139601

WEIGHBRIDGE DOCKET

BENEDICT RECYCLING
BANKSMEADOW
ABN: 71123156507
38 MCPHERSON ST
BANKSMEADOW

PH: 02 9316 6333

W-104922

04 Aug 201 12:30 PM

TRUCK ID: [illegible]
CUSTOMER CODE: LOCHBO

LOCHBOND PTY LTD

SOURCE: PO BOX 1272
POTTS POINT
ORDER NO: ROSEBAY
JOB NO:

AMOUNT	ITEM	RATE
0.08t	L_DEMO	

METRES: 1.5

GROSS: 2.60 t TARE: 2.52 t

NET: 0.08 t

Driver Signature :

I hereby certify that the docket details are correct and I have not exceeded my gross vehicle mass weight.

I hereby certify that this load does not contain any contaminated, hazardous, liquid, putrescibles or asbestos materials.

I have read and understood the conditions of entry.

Part of our tipping fees contains the $133.10 EPA waste tax for every tonne that is stockpiled on site.

ATTACHMENT C: Prohibited Wastes

The following waste types as defined by the NSW Environment Protection Authority's *NSW Classification Guidelines Part 1: Classifying Waste (November 2014)*, will be excluded from the facility:

a) Hazardous Waste

- Containers, having previously contained a substance of Class 1, 3, 4, 5 or 8 within the meaning of the Transport of Dangerous Goods Code, or a substance to which Division 6.1 of the Transport of Dangerous Goods Code applies, from which residues have not been removed by washing2 or vacuuming
- Coal tar or coal tar pitch waste (being the tarry residue from the heating, processing or burning of coal or coke) comprising of more than 1% (by weight) of coal tar or coal tar pitch waste
- Lead-acid or nickel-cadmium batteries (being waste generated or separately collected by activities carried out for business, commercial or community services purposes)
- Lead paint waste arising otherwise than from residential premises or educational or child care institutions
- Any mixture of the wastes referred to above

b) Special Waste

- Clinical and related
  - clinical waste
  - cytotoxic waste
  - Pharmaceutical, drug or medicine waste
  - Sharps waste (for cutting, piercing or penetrating the skin) – any waste from the use of sharps from human health care, medical research, veterinary care or skin penetration, injection of drugs, or other substances
- Asbestos Waste
- Waste Tyres

c) Liquid waste of any description

- Any waste (other than Special Waste) that:
  - Has an angle or response less than 5 degrees above horizontal
  - Becomes free flowing at or above 60 degrees Celsius or when it is transported
  - Is generally not capable of being picked up by a spade or shovel
  - Is classified as liquid waste under an EPA gazettal notice

d) General Solid Waste (Putrescible)

- Household waste that contains putrescible organics
- Waste from litter bins collected by or on behalf of local councils
- Manure and night soil
- Disposable nappies, incontinence pads or sanitary napkins
- Food waste

- Animal waste
- Grit or screenings from sewage treatment systems that have been dewatered so that the grit or screenings do not contain free liquids
- Any mixture of the wastes referred to above

ATTACHMENT D: Notification of Non-Conforming Waste Form

Form 72.5

Notification of Non Conforming Waste Form

BENEDICT

This form is to be completed by the Weighbridge Operator, Waste Controller or other authorised Benedict employee who identifies non conforming waste on site.

Date:			
Driver Name:			
Company:			
Company Contact:		**Phone #:**	
Address Collection of Waste:			
Docket #:			
Time of Delivery:			
Time of Notification:			
Registration:			
Reason for Rejection:			

This notification is to inform customers of **BENEDICT Recycling** about non conforming waste occurrences. **BENEDICT Recycling** only accepts inert Mixed Demo Waste and recyclable material, as classified by Environmental Guidelines: *Assessment, Classification & Management of Liquid and Non-Liquid Wastes* (EPA, 1999). The above vehicle was identified as bringing in non conforming waste at the following location:

- ☐ Belrose
- ☐ Chipping Norton
- ☐ Newcastle
- ☐ Unanderra
- ☐ Other _____

Identification Location – please tick

- ☐ Weighbridge
- ☐ Waste sorting / inspection area before unloading
- ☐ Waste sorting / inspection area during examination after unloading

It is requested that you undertake the following action immediately. If action is not taken on the same day of this notification further charges will be incurred.

Action Taken – please tick

- ☐ Non complying load isolated
- ☐ Removal of waste from site
- ☐ Reloading into truck or suitable waste bins as supplied by you the customer. Please be advised that a reloading fee will be charged
- ☐ Reclassification and price change. Reload fee docket number _____ or docket attached
- ☐ None

- ☐ Emailed to Group by _____
- ☐ Save copy under J:Benedict Recycling/Form 72

For any further clarification please contact Gay Willis on 0427 087 897

APPENDIX D – WATER MANAGEMENT PLAN

PROPOSED PENRITH WASTE RECYCLING AND TRANSFER FACILITY

46-48 PEACHTREE ROAD, PENRITH

ENVIRONMENTAL IMPACT STATEMENT

WATER MANAGEMENT REPORT

OCTOBER 2018

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

TABLE OF CONTENTS

FIGURES

APPENDIX

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

1. Introduction

Benedict Recycling Pty Ltd proposes to operate the Penrith Waste Recycling and Transfer Facility from an existing industrial lot at 46-48 Peachtree Road, Penrith (refer Figure 1).

This report deals with the water management issues and has been prepared by Mark Tooker of Tooker and Associates to support a State Significant Development Application (SSDA) for the project.

2. Site Description

The site is an existing industrial property at 46-48 Peachtree Road Penrith within an IN1 General Industrial zoning (refer Figure 1). It has an area of 4,367m^2 and is currently used by an autowrecker. The site is relatively flat with a concrete hardstand covering the entire site outside the shed generally located in the south eastern area of the site (refer Figure 2).

The surface water on the site drains to the southern boundary via the stormwater drainage pipelines running along the eastern and western site boundaries (refer Figure 2). There are 450 x 450mm grated drainage inlet pits with bases lowered 150mm to incorporate sediment traps. The drainage lines run separately to the back of the kerb to discharge into the gutter in Peachtree Road. These discharges flow to a 3m long inlet pit in the Peachtree Road drainage system.

3. Proposed Development

The proposed development will only accept General Solid Waste (Non Putrescible), as defined by the NSW Environment Protection Authority, for recycling, including soils, metals and dry paper/cardboard. No special, liquid, hazardous, restricted solid waste or general solid waste (putrescible) will be accepted at the site.

The layout of the proposed development is presented on Figure 3. The material handling activities will be covered by a roof extending over 3,000m2 (69% of the overall site) of the site. The entry and exit driveway areas including the weighbridges along with five car parking spaces will be open areas without a roof. The site and drainage system will be upgraded by:

- pressure cleaning the site surface to remove the residual oil;
- capturing part of the main shed roof runoff into a rainwater tank for reuse in the amenities;
- cleaning out of existing drainage system to remove accumulated materials from previous use;
- installing grated drains across the two driveways to capture overland flows;
- updating the drainage outlet pipes to the kerb;
- including water efficient fixtures in any update of the site amenities.

The proposed new stormwater infrastructure on the site is presented on Figure 4.

These proposed roof and measures for the drainage system will improve the runoff water quality and reduce the volume of runoff from the site. There will be no increase in impervious areas on the site for the proposed development.

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

4. Council Water Management Requirements

The Penrith Development Control Plan (DCP) 2014 details the requirements for surface water management and the water sensitive urban design (WSUD) approach for development. In Table C3.1 (on page C3-9), the Council requirements for an industrial development which is not increasing the impervious area by greater than 250m^2 are to incorporate water saving measures by installing water efficient labelling and standards (WELS) fixtures. These fixtures need to be 4 star dual flush toilets and taps and 3 star showerheads and urinals. There are no requirements in the DCP for runoff water quality or quantity controls for the proposed development.

The DCP requires further potable water use reductions by the incorporation of rainwater reuse to supplement the non-potable water uses.

No onsite detention is required because there will be no change in the area of impervious surfaces on the site and therefore no increase in the peak flow rate from the site. The DCP also does not require detention storage for this development.

5 Risk Assessment

5.1 Surface Water Management

5.1.1 Operation Phase - WSUD

The Penrith DCP does not require water quality treatment devices for this development. Notwithstanding this, the provision of a roof over the majority of the site will remove a significant quantity of potential pollutants in the runoff from the site. The incorporation of reuse of roof runoff in the amenities will further reduce the runoff pollutant load and also reduce the volume of runoff from the site.

The sumps in the existing drainage inlet pits in the open areas would be the first line of treatment for the site runoff. Coarse materials and sediment would be trapped in the sumps.

Runoff from the open areas on the site will be collected in the drainage inlet pits and grates across the driveways and piped to the Peachtree Road kerb drainage system (refer Figure 4).

The drainage inlet pits would be maintained regularly by the removal of accumulated materials. The sediment sumps in the drainage inlet pits would be cleared on a monthly basis (or as required).

The majority of the pollutant load in runoff is discharged in small storms up to the 3 month ARI storms. Research has indicated that over 90% of the annual pollutant load is contained in frequent runoff up to the 3 month ARI storms. The provision of a roof over 69% of the site and reuse of roof runoff would reduce the runoff pollutant load by more than 55% compared to the existing site. The drainage system will readily cater for these storms and grates across the two driveways will collect the overland surface flows. The proposed drainage system will have an in pipe capacity up to a 10 year ARI storm runoff.

No runoff detention storage is required by the Penrith DCP 2014 for this development. No onsite detention storage is required in any case because the development will not result in an increase in impervious areas and as such, there would be no increase in the site runoff flow rates.

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

5.1.2 Construction Phase

The proposed works on the site will include installation of offices, weighbridges, block walls, a driveway as well as a general clean-up of the site hardstands and drainage system. A roof would be erected over the majority of the site.

The runoff control measures to be incorporated in an erosion and sediment control plan for the construction works onsite would include (refer Figure 5):-

- Geotextile cloth to cover the grate of all the drainage inlet pits onsite to remove fine sediment and debris in runoff;
- Gravel filled bags around the perimeter of all the drainage inlet pits on site to temporarily pond runoff locally and remove medium to coarse sediments from runoff;
- Gravel filled bags laid across the existing and proposed entry driveway at the site boundary to temporarily pond runoff locally and remove sediments from runoff; and
- Installation of a silt fence across the back of the kerb at the location of the new driveway construction to remove sediment from runoff prior to discharge to the gutter.

5.2 Site Water Balance

The facilty will have up to 7 personnel on site at any one time and will include toilets, wash basins, kitchen, lunchroom and two offices. These will be refurbished. Any new water fixtures installed will comply with the WELS ratings required by Council which will be 4 star dual flush toilets and taps and 3 star showerheads and urinals.

The average annual supply of roof runoff from the main shed would be stored in a 4,000L rainwater tank with a pumped supply line to the amenities. It is estimated that the roof runoff reuse could readily supply the demand for non potable water use in the amenities (refer Appendix A).

The potable water for the site will be supplied from the existing water mains in Peachtree Road and sewage from the amenities will be discharged to the existing sewer.

The site water balance has been calculated based on the proposed development and details are provided in Appendix A.

The average annual runoff volume from the site under existing conditions has been estimated at approximately 2,454m³.

In the developed scenario, the extent of runoff from the site will be reduced by capturing runoff and reusing it for use in the amenities. The estimated average annual reuse volume would be 30m3. This reuse will reduce the average annual runoff volume from the site by 1%.

The use of 3 and 4 star WELS water fixtures in the facilty will further reduce the potable water use on the site. This provides a benefit in reducing the demand on the water supply in terms of the volume available and the water reticulation available capacity.

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

5.3 Flooding

The site is nominated on Penrith Council plans as being within the "flood planning area". This indicates that the finished levels on the site are below the 100 year ARI flood level plus 0.5m freeboard. It is located within the flood fringe area.

The Penrith CBD Overland Flow Flood Study undertaken by Cardno for Council shows the flood extents for a range of flood severities. The flood extents for the 100 yr ARI and the PMF floods are presented on Figures 6 and 7.

The 100 yr ARI floodwaters do not inundate Peachtree Road at its site frontage. Even in the PMF flood, the floodwaters only pond on the road verge and on the grass area along the site frontage. This grass is not used as part of the recycling facility operation.

The Penrith LEP 2010 Clause 7.2 (4) Flood Planning requires compliance with the following requirements.

"(a) is compatible with the flood hazard of the land" – the site is elevated above the road and would have a low flood hazard given the shallow flood depths and low flow velocities;

"(b) is not located within a floodway" – the site is not located in a floodway;

"(c) is not likely to adversely effect flood behaviour" –the site is an existing industrial site and the development will retain the existing features of the site and will not create any adverse impacts on flood behaviour compared to existing conditions;

"(d) is not likely to signficantly alter flow distributions and velocities" – as mention in (c), the proposed development would retain the existing main features and hence would not signficantly change the existing flood conditions;

"(e) is not likely to adversely effect safe and effective evacuation" – the flood behaviour would be unaffacted by the development and there would not be a signficant increase in workforce capacity on the site and as such, would not affect evacuation in a flood compared to existing conditions;

"(f) is not likely to signficantly detrimentially affect the environment" – the proposed facility would maintain the same main features onsite and hence would not detrimentally affect the environment, cause erosion or affect any riparian area;

"(g) is not likely to result in unsustainable social and econonmic costs to the community as a consequence of flooding" – the proposed site use is similar to the historic and current site use and hence there would not be any unsustainable impacts due to flooding;

"(h) incorporates appropriate measures to manage risk to life from floods" – signs would be installed in the office and lunchrooms indicating the site is located on flood liable land and in case of a flood, employees are to evacuate the site as directed by SES or Council personnel;

"(i) is consistent with any relevant floodplain risk management plan" – Council does not have a floodplain risk management plan covering the subject site, however the proposed development complies with Council's flood related requirements in the DCP.

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

The proposed development complies with all the Council LEP requirements for sites nominated within the flood planning area.

5.4 Acid Sulphate Soils

The site is not included in the Office of Heritage and Environment Acid Sulphate Soils Risk Maps because there is no underlying potential for this risk in the area of Penrith.

5.5 Salinity

The then Department of Infrastructure Planning and Natural Resources prepared a Salinity Potential Map for Western Sydney in 2002. This map indicates that the Recycling Facility site has a "Moderate Salinity Potential". This classification means that salinity processes may occur on the site. There is no evidence of soil salinity on the site. This issue will have been dealt with at the sub division construction stage in order to provide a lot which complied with the salinity guidelines.

Impermeable sheeting would be placed under the driveway slab to avoid any salinity impacts.

5.6 Watercourses and Riparian Areas

The site is located within a planned industrial estate which has allocated space outside the lots for drainage and riparian corridors. The proposed development therefore will not adversely impact on watercourses or riparian corridors. The reuse of runoff for dust suppression will reduce the volume of runoff from the site.

The Council's DCP does not require any onsite detention or water quality treatment of runoff on the site. The proposed reduction in runoff volume and treament of runoff from the site prior to discharge will contribute to the long term improvement in receiving water quality and bank stability.

5.7 Groundwater

The entire site is paved and hence will not allow any significant transport of pollutants from the site surface into the groundwater.

The proposed development, therefore, will not have any significant adverse impacts on groundwater flows or quality.

6 Summary of Mitigation Measures for the Proposed Development

The mitigation measures proposed to minimise the impact of the proposed works on the water related aspects of the environment are:

- a runoff erosion and sediment control strategy would be implemented during the construction phase to manage runoff which conforms to State Government best practice guidelines in the Blue Book;
- use of the existing runoff sediment traps in the existing drainage inlet pits to remove sediment and debris at the source;
- installation of grated drains across the two driveways to capture surface runoff before leaving the site;

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

- reuse of roof runoff for non potable uses in the amenities to reduce runoff pollutant loads and potable water use;
- installation of water efficient fixtures to conform to Council requirements;
- connection to the sewerage system for onsite personnel amenities;
- no use of groundwater; and
- no use of water in the product processing.

7. Conclusions

The proposed processing facility and mitigation measures have been formulated to minimise the impact on water related aspects of the site and downstream watercourses and riparian areas. As such, the proposed development will not have a significant adverse impact on:-

- stormwater runoff;
- groundwater;
- wastewater disposal;
- potable water demand;
- runoff volume and water quality;
- flooding;
- acid sulphate soils;
- salinity; and
- watercourses and riparian areas.

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

FIGURES

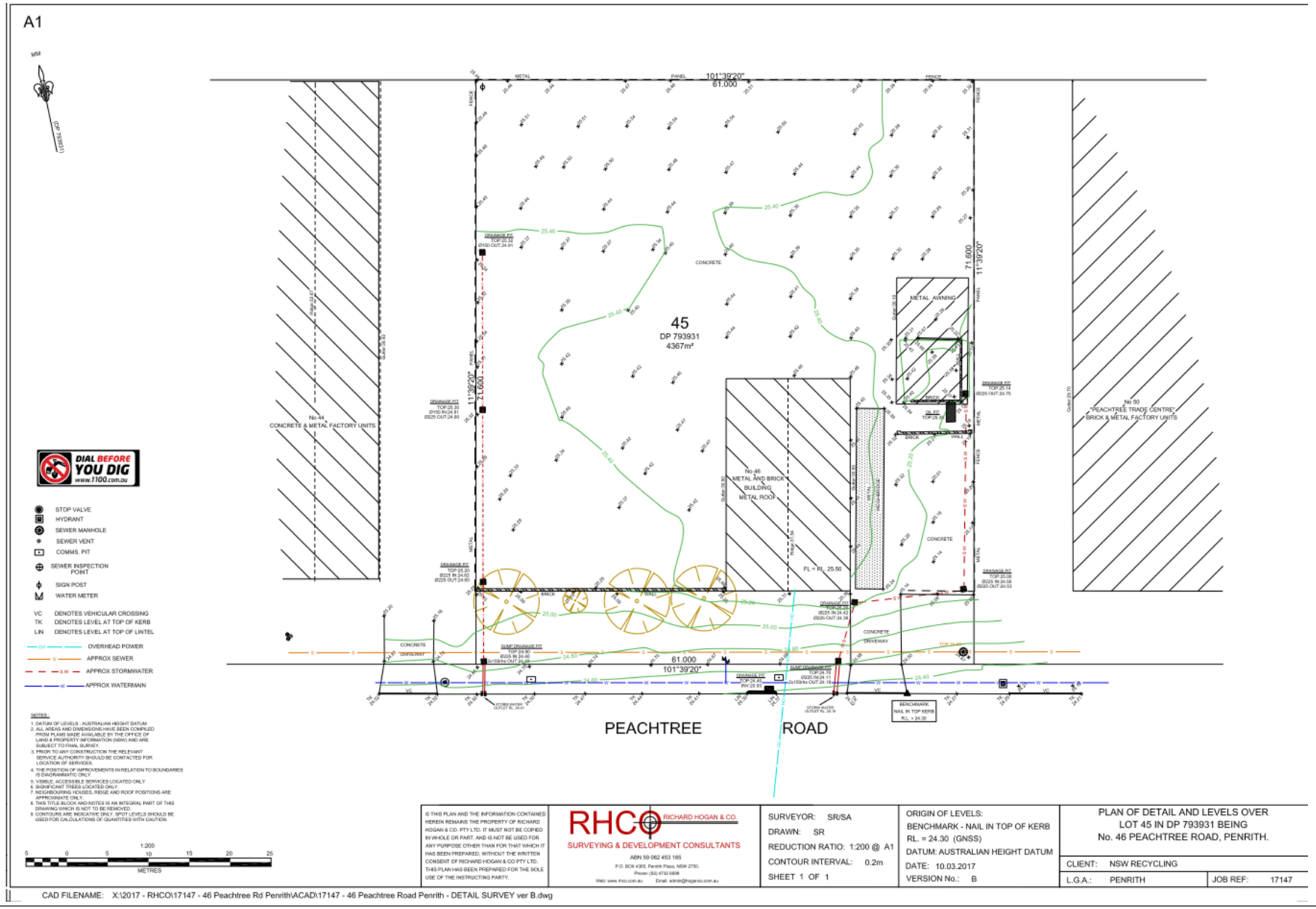
m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

\\emmsvr1\EMMJobs\2016\J16099 - Penrith Waste Recycling and Transfer Facility\GIS\02_Maps_EIS\Tech_Studies\Water\WAT003_SiteContext_20181030_03.mxd 30/10/2018

Site context

Penrith Waste Recycling and Transfer Facility

Figure 1



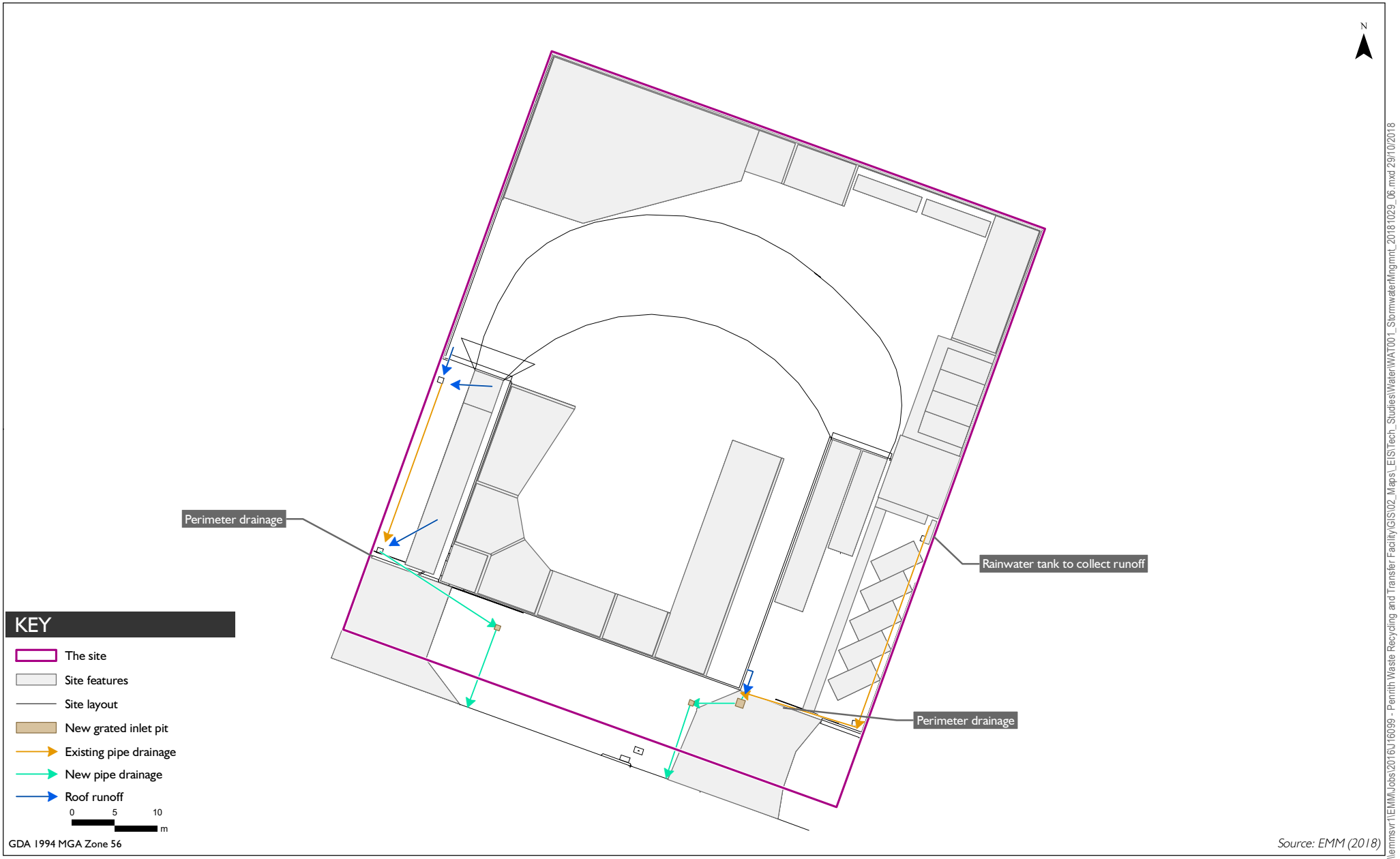
\\emmsvr1\EMMJobs\2016\I16099 - Penrith Waste Recycling and Transfer Facility\GIS\02_Maps_EIS\Tech_Studies\Water\WAT005_Waterlevels_20181029_01.mxd 30/10/2018

Source: EMM (2018); RHCO (2018)

Site survey

Penrith Waste Recycling and Transfer Facility

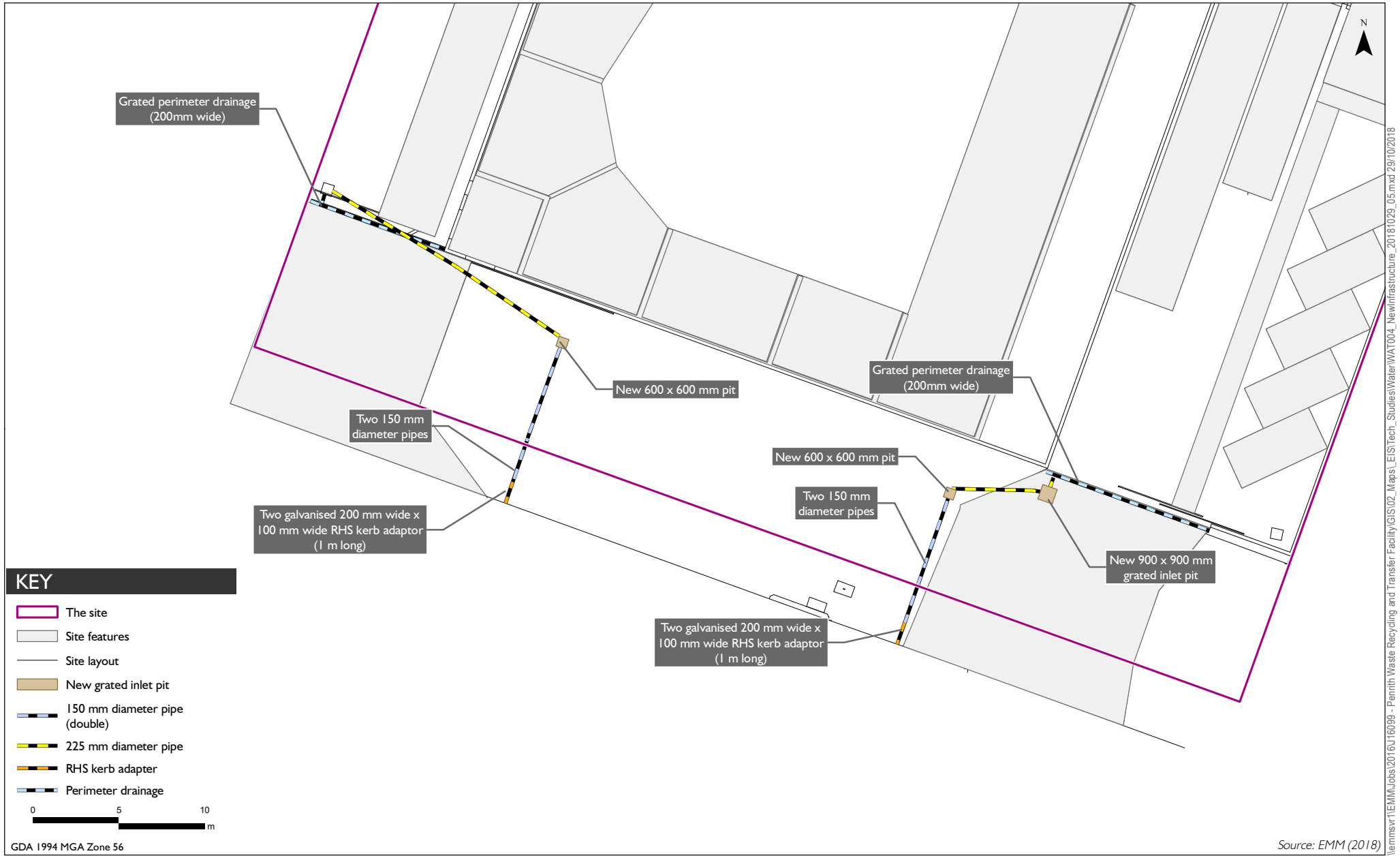
Figure 2



\\emmsvr1\EMMJobs\2016\J16099 - Penrith Waste Recycling and Transfer Facility\GIS\02_Maps_EIS\Tech_Studies\Water\WAT001_StormwaterMngmnt_20181029_06.mxd 29/10/2018

Stormwater management concept plan

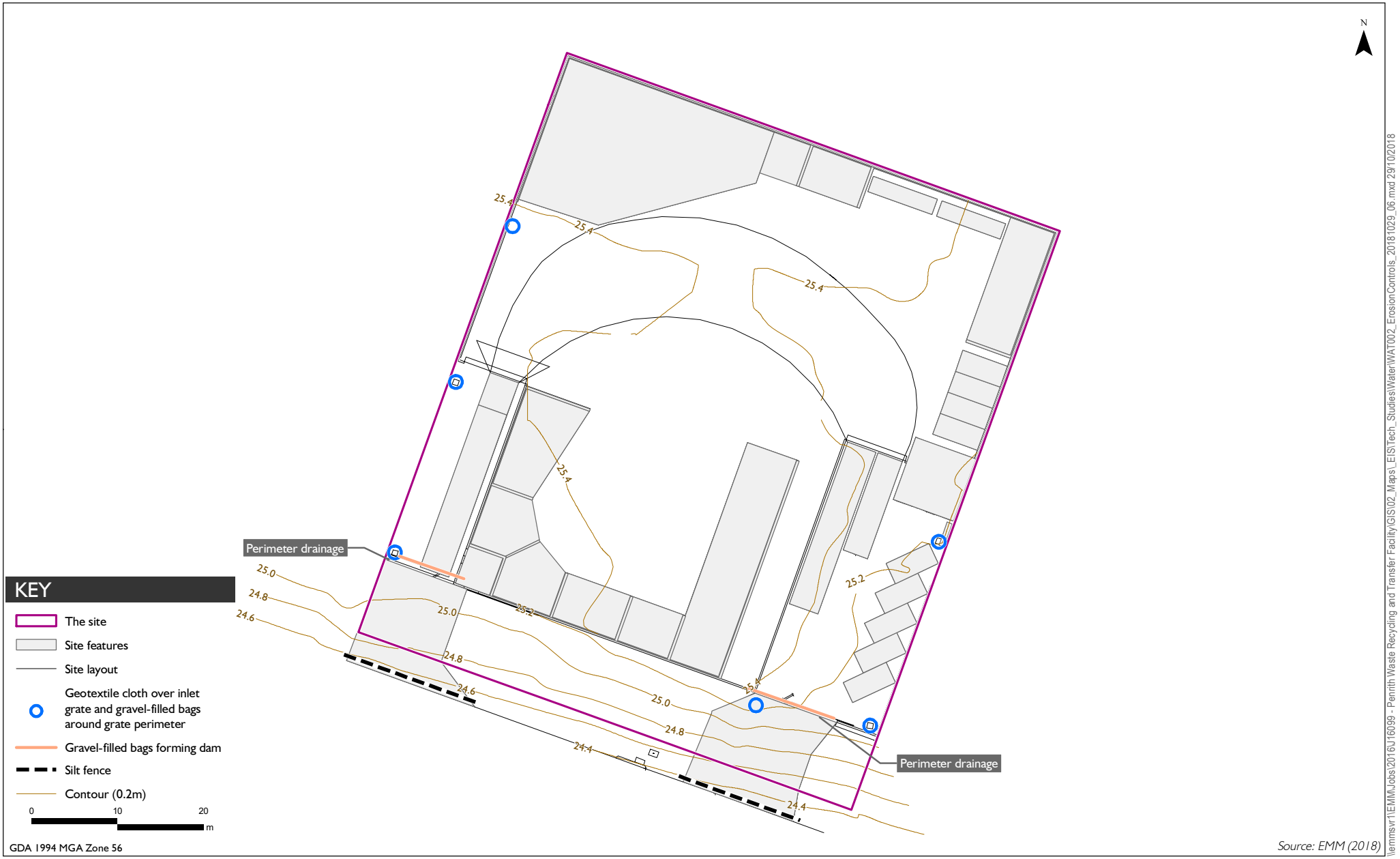
Penrith Waste Recycling and Transfer Facility
Figure 3



Proposed new stormwater infrastructure

Penrith Waste Recycling and Transfer Facility

Figure 4



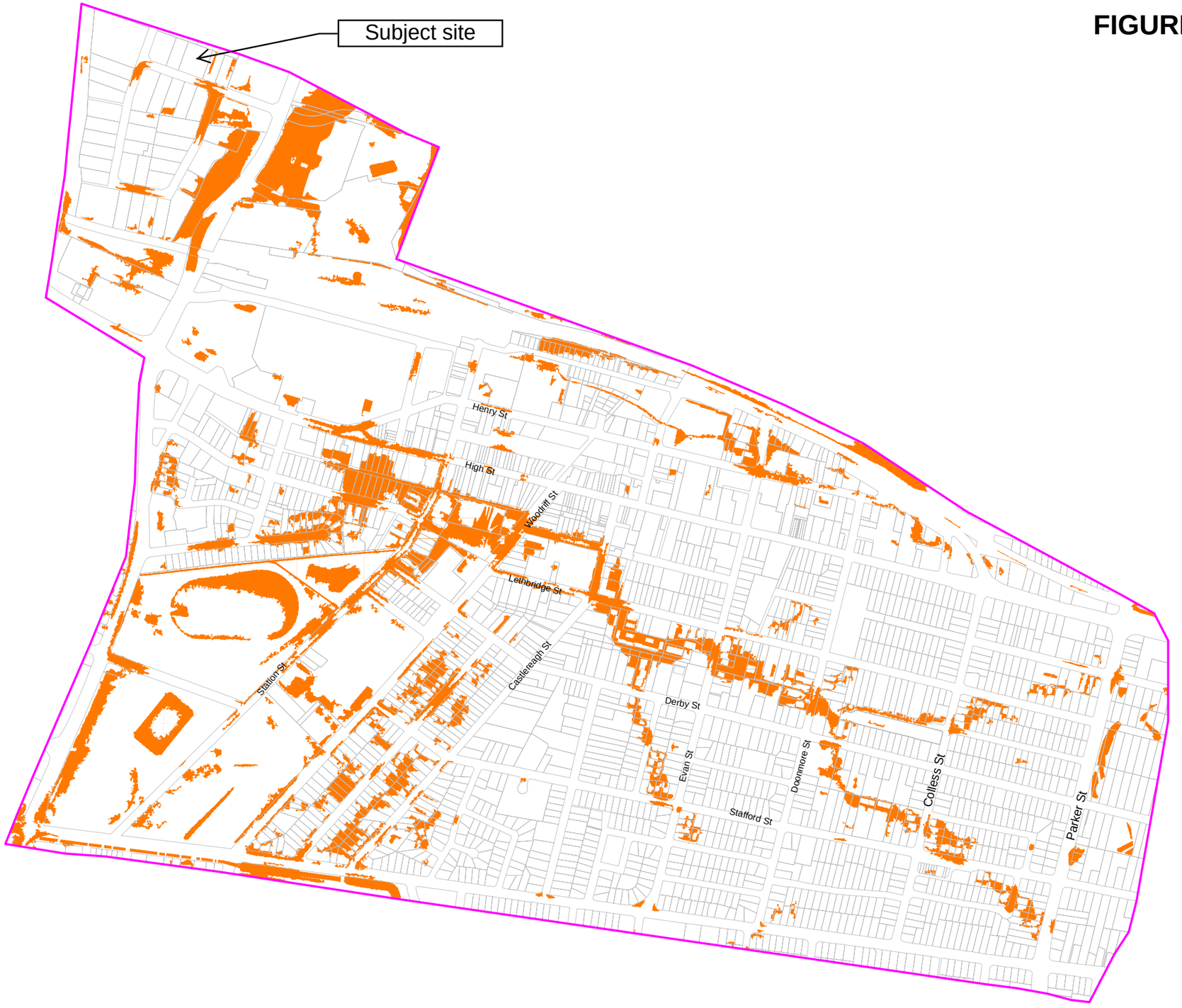
EMM

Erosion and sediment control plan

Penrith Waste Recycling and Transfer Facility

Figure 5

FIGURE 6



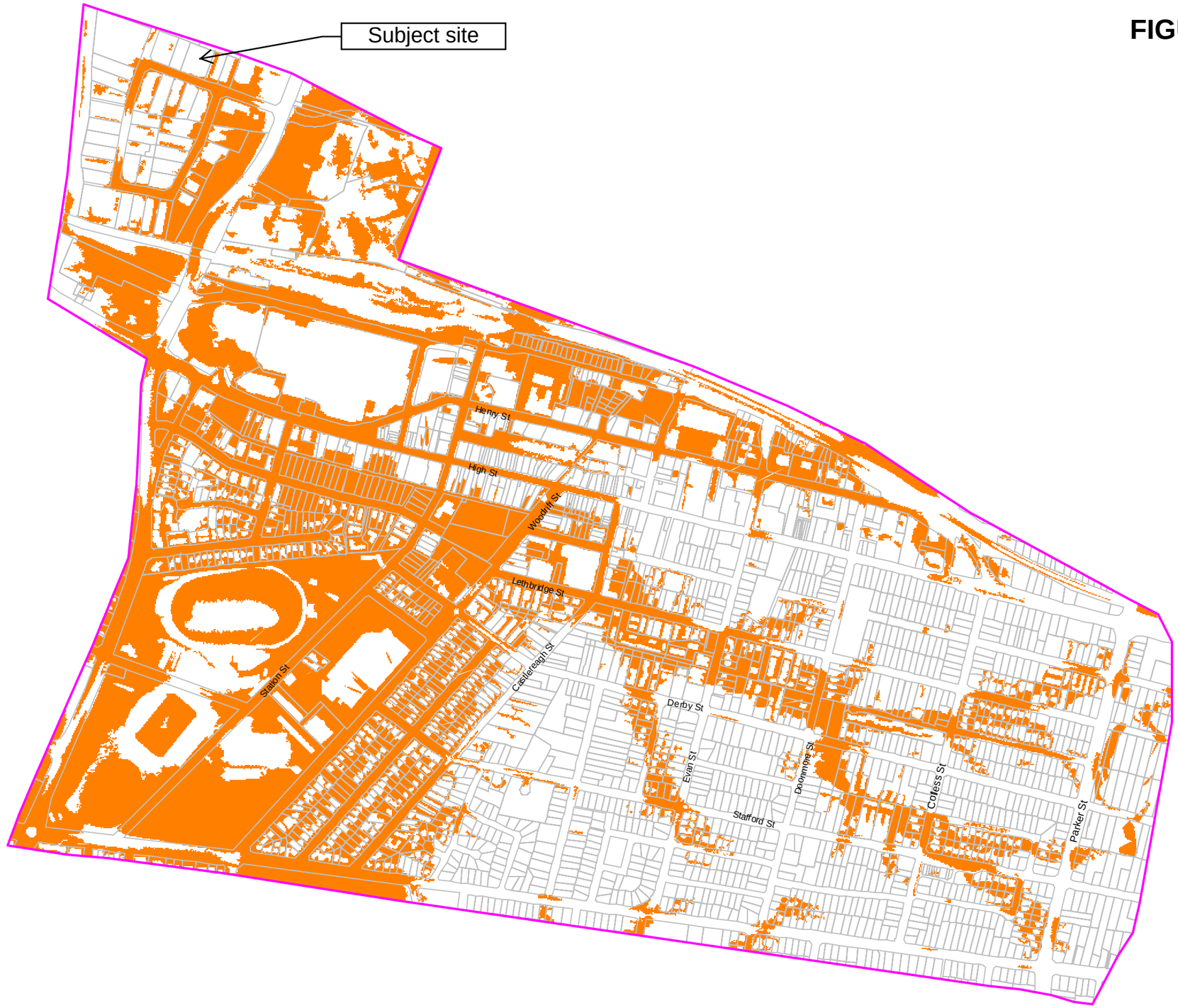
Cardno

W4735
July 2015

Penrith CBD Detailed Overland Flow Flood Study

FLOOD EXTENT- 100 YEAR ARI

FIGURE 7



Flood Extent - PMF

Study Area

Cardno

W4735
July 2015

Penrith CBD Detailed Overland Flow Flood Study

PMF FLOOD EXTENT

APPENDIX A

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

Site Annual Water Balance

1. Assumptions

Mean Annual Rainfall	802.7mm
Mean Number of Rainy Days	70 days
Mean Number of Dry Days	295 days
Annual Volumetric Runoff Coefficient	0.7
Total Site Area	4367m²
Roof Area for Rainwater collection	3000m²
Non Potable water use in the amenities	30m³

Existing Conditions

Site Area	4367m²
Average Annual Volumetric Runoff Coefficient	0.7
Average Annual Rainfall	802.7mm
Average Annual Runoff Volume	4367 x 0.7 x 0.8027 = 2454m³

2. Non Potable Water Reuse

Annual Rainfall Runoff Reuse

Roof area used for reuse	3000m²
Average Annual Rainfall	802.7mm
Average Annual Runoff Coefficient	0.7
Average Annual Volume available for rainwater reuse	1686m³
Rainwater runoff reuse in amenities	30m³

3. Site Water Balance

Surface Runoff

Average Annual Site Runoff – existing conditions	2454m³
Average Annual Rainwater reuse for amenities	30m³
Average Annual Nett Site Runoff – after development	2424m³

m 0409 912 631 e mark.tooker@tookerandassociates.com.au a 30 Walworth Avenue, Newport abn 39 619 046 070

APPENDIX E – AIR QUALITY MANAGEMENT PLAN

Penrith Waste Transfer and Recycling Facility

Air Quality Management Plan

Prepared for Benedict Recycling Pty Ltd
March 2021

EMM Sydney
Ground floor, 20 Chandos Street
St Leonards NSW 2065

T 02 9493 9500
E info@emmconsulting.com.au

www.emmconsulting.com.au

Penrith Waste Transfer and Recycling Facility

Air Quality Management Plan

Report Number

J16099 RP16

Client

Benedict Recycling Pty Ltd

Date

3 March 2021

Version

Final

Prepared by

Scott Fishwick
Associate, National Technical Leader, Air Quality
3 March 2021

Approved by

Francine Manansala
Associate, Air Quality
3 March 2021

Table of Contents

Tables

Figures

1 Introduction

1.1 Background

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

EMM Consulting Pty Limited (EMM) has been engaged by the Applicant to prepare an Air Quality Management Plan (AQMP) for the facility as required by Condition B23 of the Stage Significant Development (SSD) Consent (Ref: SSD 7733) (the Consent) issued by the NSW Department of Planning, Industry and Environment (DPIE).

The Consent was originally approved on 15 May 2020 for construction and operation of a resource recovery facility to process up to 180,000 tonnes per annum (tpa) of general solid waste (non-putrescible).

1.2 Project overview

The facility is located at 46-48 Peachtree Road, Penrith, legally described as Lot 45 DP 793931. The site comprises of 4,367 square metres (m^2) 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 facility has been developed to provide a range of services to the demolition and construction industries, including:

- receival of waste;
- sorting of waste;
- recovery of recyclables;
- dispatch of recovered recyclables; and
- transfer and disposal of residuals.

A site location plan (Figure 1.1) and a site layout plan (Figure 1.2) are provided below.

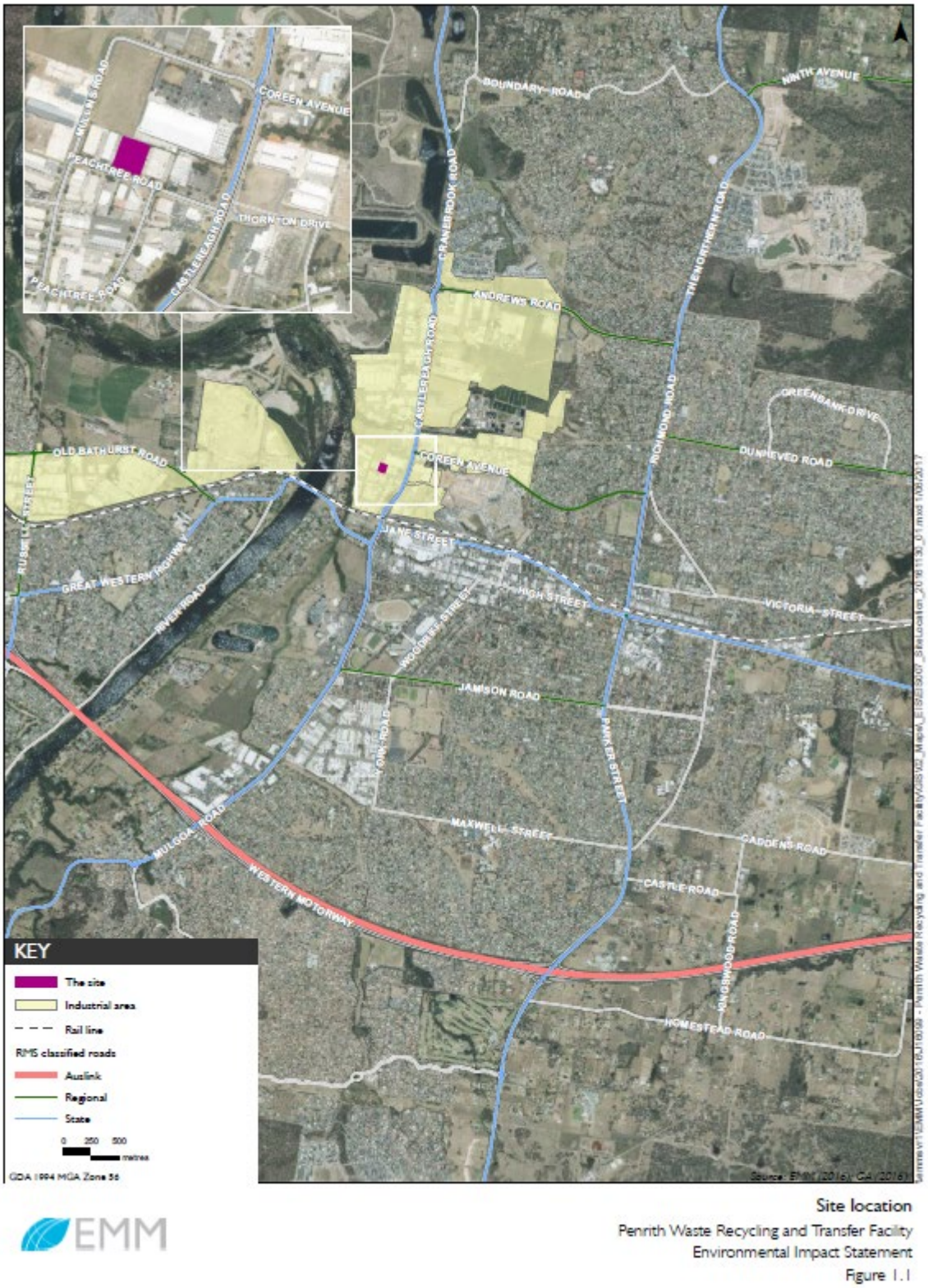


Figure 1.1 Project location

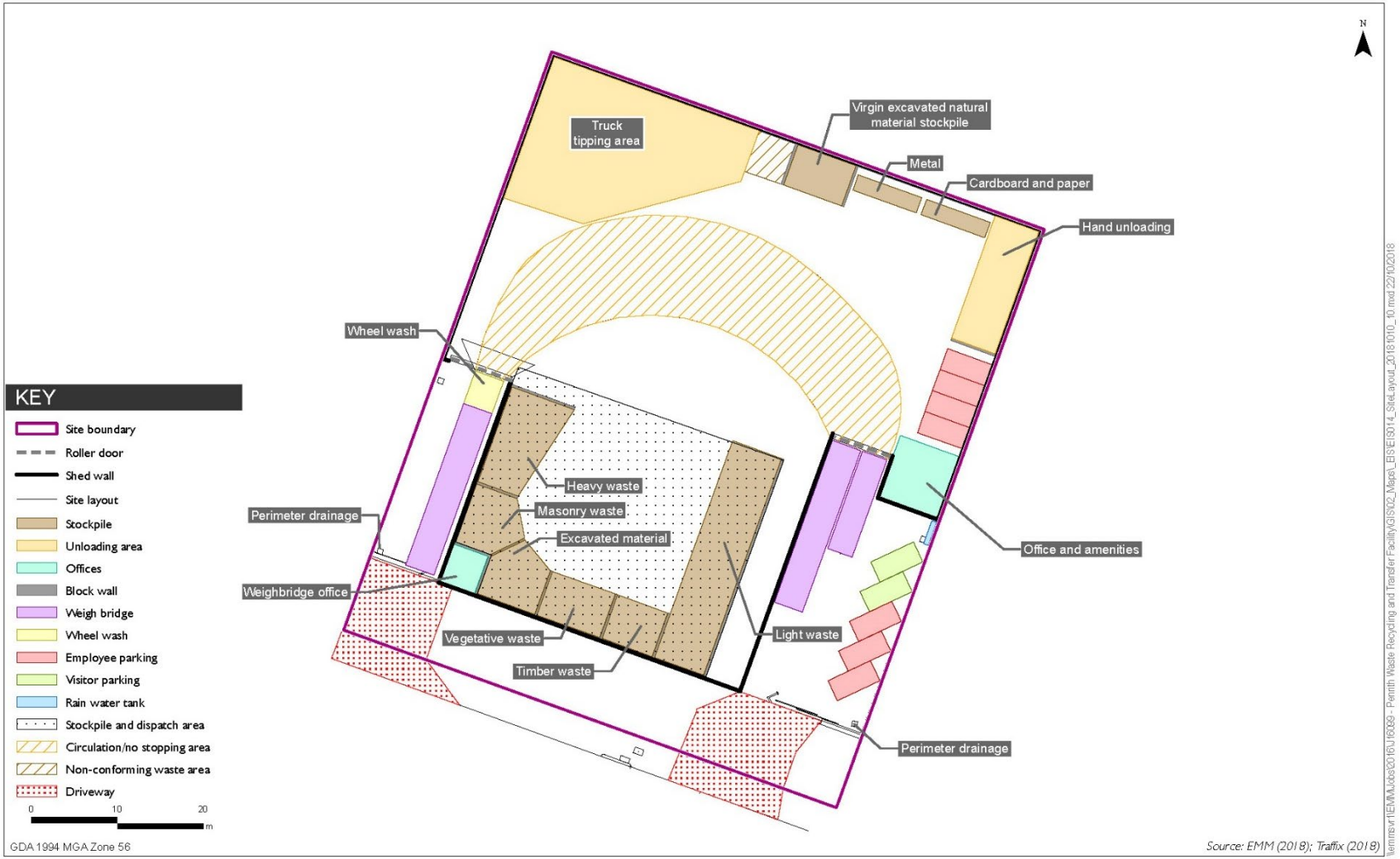


Figure 1.2 Site layout plan

1.3 Facility operations

Waste will be transported by waste contractors to the site entrance located on Peachtree Road. Vehicles will then proceed to a weighbridge complex to be weighed. The weighbridge complex will be fitted with CCTV, to monitor the front and rear of vehicles and their load characteristics.

Each load arriving at the facility will be inspected and classified prior to the material being deposited on site. All waste accepted will be recorded on the facility's weighbridge system and a customer docket/receipt produced.

Incoming waste will be inspected by camera at the weighbridge and again after being tipped and spread. Waste material that is unacceptable or specified prohibited from entering the site (as defined in the Waste Management Plan for the facility) will be refused entry and diverted to an appropriately licensed facility or reloaded if discovered after tipping off and spreading.

After leaving the weighbridge, each load will be directed to the appropriate storage area by the site staff. All waste will be unloaded within the designated unloading area and stored within the designated waste stockpile areas. Wherever possible, raw materials will be sorted at the source and directly tipped into segregated bays on-site.

Unsorted materials will be spread and sorted into various categories and formed into segregated stockpiles. The sorted waste material may be subject to processing depending on its category and presentation.

Processing on-site may include screening and picking. The processed material will be stockpiled into various processed categories for return to the market as product material.

1.4 Hardstand material sorting and storage area

The entire site, apart from the 10 m vegetated buffer at Peachtree Road, is sealed with hardstand and mostly covered by the shed structure. The floors of the sheds, bays and mounting areas for temporary structures are sealed with concrete for the handling, storage, loading and sorting of segregated waste materials and associated traffic movements.

1.5 Plant and equipment

Condition A24 of the development consent states:

> All plant and equipment used on site, or to monitor the performance of the development must be:
>
> (a) maintained in a proper and efficient condition; and
>
> (b) operated in a proper and efficient manner.

Regular maintenance of all plant and equipment will be logged and stored on site available for review at any time.

1.6 Operating times

Consent Condition B25 provides the hours of operation for the facility as detailed in Table 1.1 below.

Table 1.1 Operating hours

Activity	Day	Time
Waste deliveries and dispatch	Monday – Friday	6.00 am to 10.00 pm
	Saturday	6.00 am to 6.00 pm
	Sunday	8.00 am to 4.00 pm
Waste sorting	Monday – Friday	6.00 am to 10.00 pm
	Saturday	7.00 am to 6.00 pm
	Sunday and Public Holidays	Nil

Condition B26 of the Consent outlines the circumstances and requirements where operations may be conducted outside of the hours specified in Table 1.1. These are summarised as follows:

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

Condition A9 of the Consent permits the Applicant to carry out activities including receipt, dispatch and sorting of waste, 24 hours, 7 days per week for a continuous two-week period for a maximum of six times per calendar year, subject to the following:

- the two-week periods cannot be consecutive, and must be at least two weeks apart;
- the two-week period includes weekdays, weekends and public holidays; and
- the licensee must notify the EPA and the Planning Secretary at least 24 hours prior to commencing each two-week period; and the licensee must notify the EPA and the Planning Secretary of any complaints received during the two-week period as soon as possible after the complaint is made.

1.7 Report preparation

This AQMP has been prepared by EMM's National Technical Leader for air quality, Scott Fishwick. Scott has over 15 years' experience as a senior air quality consultant, specialising in atmospheric dispersion modelling, air quality impact assessments, meteorological processes, ambient air quality and meteorological monitoring.

2 Development consent conditions

Table 2.1 lists the requirements of the development consent conditions and references the section of the AQMP where each of these requirements has been addressed.

Table 2.1 Development consent conditions and relevant section of the report

Condition Number	Condition	Relevant report section
B19	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	4.1
B21	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	4.1, 4.3
B22	The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	3.3, 4.2
B23	Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by condition C5 and must:	
	a) be prepared by a suitably qualified and experienced person(s);	1.7
	b) detail and rank all emissions from all sources of the development, including particulate emissions;	3.1, 3.2, 3.3
	c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;	5.4, 5.5
	d) identify the control measures that that will be implemented for each emission source; and	4
	e) describe proactive and reactive management strategies.	4
B15	The Applicant must:	
	a) not commence operation until the Air Quality Management Plan required by condition B23 is approved by the Planning Secretary; and	n/a
	b) implement the most recent version of the Air Quality Management Plan approved by the Planning Secretary for the duration of the development	n/a

n/a – not applicable

3 Facility emission sources

3.1 Dust emissions sources

A detailed air quality impact assessment (AQIA) for the facility was completed by Ramboll Australia (2018) and features as Appendix C to the Response to Submissions report for the facility (EMM 2018).

The primary air pollutants generated by the facility are particulate matter, including the following:

- total suspended particulate matter (TSP);
- particulate matter less than 10 microns in aerodynamic diameter (PM_{10}); and
- particulate matter less than 2.5 microns in aerodynamic diameter ($PM_{2.5}$).

The AQIA quantified annual emissions from the facility and identified the following sources of air pollutant emissions:

- vehicle entrainment of particulate matter due to the movement of trucks and mobile equipment on paved surfaces (incoming and outgoing movements);
- unloading of material to the raw material storage areas inside the shed;
- handling, sorting and transfer of raw material inside the shed;
- loading and transfer of material to stockpiles inside the shed;
- loading of material to truck for dispatch inside the shed; and
- diesel fuel combustion by on-site plant and equipment.

3.2 Source significance

Based on the emissions inventory presented in the AQIA (Ramboll Australia 2018), a summary of the significance of emission source type by particle size is presented in Figure 3.1.

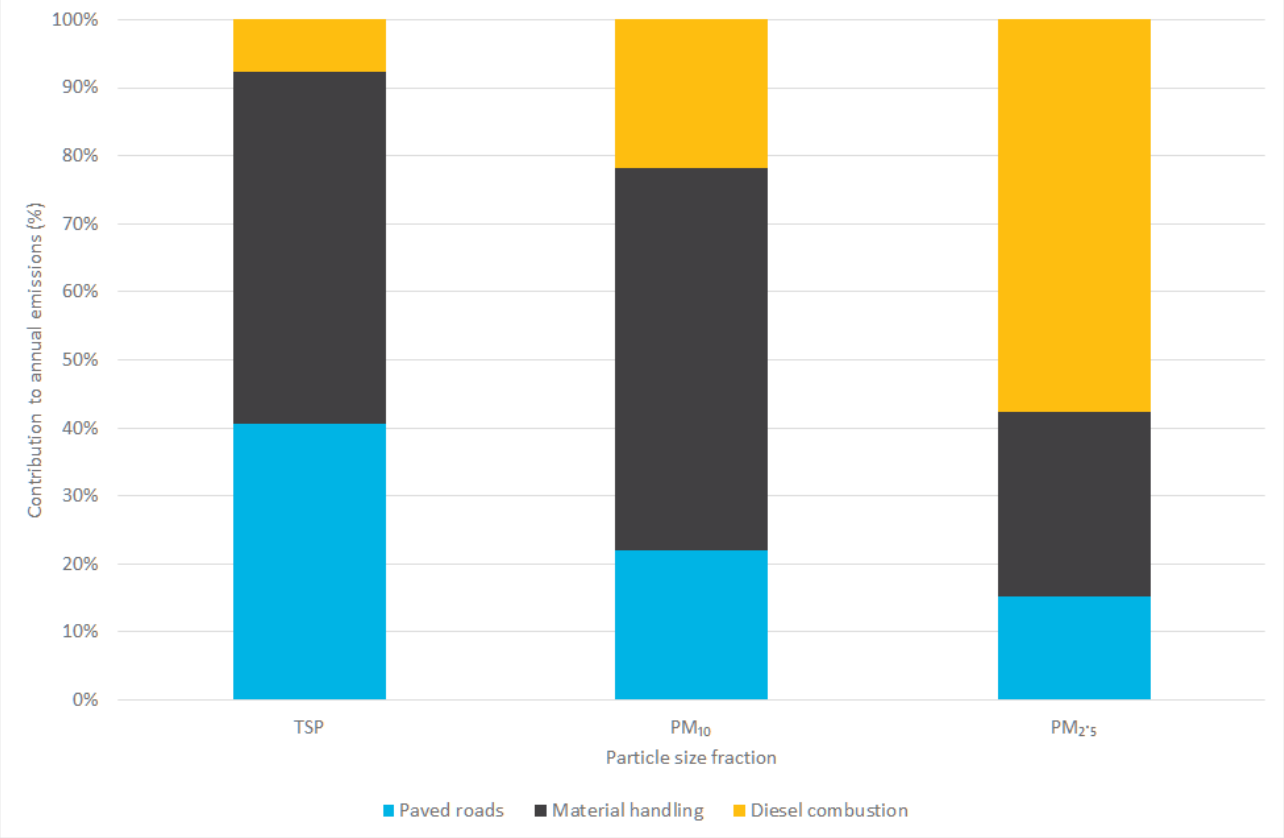


Figure 3.1 Emission source significance by particle size – AQIA inventory

The following notes are made in relation to site emissions presented in Figure 3.1:

- the handling of material (truck unloading, material sorting and transfers, loading to stockpiles and trucks) is a key contributing source of emissions across all size fractions;
- emissions of particulate matter generated by the movement of vehicles across paved surfaces represent approximately 40% of annual TSP emissions, decreasing in significance for smaller size fractions; and
- the significance of diesel combustion emissions increases with decreasing particle size, representing approximately 60% of $PM_{2.5}$ annual emissions.

3.3 Odour emissions sources

In addition to the assessment of dust emissions, the AQIA quantified emissions of odour from the facility associated with the receipt of green waste. Only small amounts of green waste will be stockpiled at the facility and measures will be implemented to prevent green waste composting (see Section 4.2).

4 Mitigation measures

4.1 Dust mitigation measures

The following dust control measures will be implemented at the facility and apply to all material handling, sorting and transfer activities occurring within the shed:

- misters will operate at the shed's vehicle ingress and egress points;
- misters will operate at the material tipping area;
- the entire site will be sealed (as it is already) except for the landscaped verge along Peachtree Road;
- materials (waste, products and residues) are to be contained wholly within the shed in marked bays; and
- wastes are to be sorted in the shed and are not to be processed outside of the shed area.

The following dust control measures will be implemented at the facility and apply to all vehicle movements that occur outside of the shed:

- the entire site will be sealed (as it is already) except for the landscaped verge along Peachtree Road; and
- a wheel wash will be used to clean truck tyres to prevent mud or sediment being carried to and deposited on public roads.

For diesel combustion emissions, the following measures will be implemented:

- any new equipment purchased for site will meet the US-EPA Tier 2 emission standards;
- all plant and equipment will be regularly serviced and maintained to meet manufacturers emissions specifications, with all maintenance to be logged and stored on site available for review at any time; and
- idling of trucks, plant and equipment on site will be minimised wherever practicable to do so.

4.2 Odour mitigation measures

The Applicant will implement the following odour mitigation measures at the facility:

- putrescible waste will not be accepted on site;
- odorous materials will not be accepted on site;
- garden waste will be dispatched to another facility licensed to accept it, as soon as there is enough to fill a dispatch vehicle, or if the material starts to compost (whichever is sooner); and
- no composting will be undertaken on-site, as verified by daily infrared, visual and odour testing.

Regarding the latter point, as explained in Section 4.1.12c of the Response to Submissions report (EMM 2018), the following testing will be completed daily:

- ranged infrared testing;

- visual checks; and
- odour testing.

In the first instance, a ranged infrared thermometer will be used to determine if the vegetative waste is warmer than the ambient temperature and other stockpiles. These devices commonly have accuracy within 2 degrees Celsius (°C). If readings show that the vegetative waste stockpile is more than 5°C warmer than the ambient temperature and neighbouring stockpiles, it will be removed.

However, given that the operational area of the facility, including the wood and green waste stockpile, will be enclosed, this waste will have negligible direct exposure to sunlight once within the facility. As such, it is not expected that any material will remain on-site long enough for composting to occur, and the proposed monitoring and management measures are considered appropriate.

4.3 Risk of adverse impacts

The AQIA (Ramboll Australia 2018) presented the results of atmospheric dispersion modelling conducted for the facility. The dispersion modelling accounted for the mitigation measures detailed in Section 4.1.

The results of the dispersion modelling conducted indicated that the operation of the facility was unlikely to result in exceedances of the applicable NSW EPA assessment criteria for particulate matter at any of the surrounding residential or industrial receptors. The risk of adverse air quality impacts in the surrounding environment from the facility with the documented dust mitigation measures in place, is considered to be low.

5 Monitoring and incident reporting

5.1 Roles and responsibilities

Facility personnel are responsible for monitoring the performance of on-site air quality (dust and odour) mitigation measures on a day-to-day basis. Responsibilities for air quality emission management are as follows:

The Site Supervisor is responsible for:

- regular visual monitoring of the dust levels at the facility;
- managing vehicle speed movements;
- restricting operations during periods of strong wind;
- ensuring that the shed misting system is functioning and effectively control dust emissions within the shed;
- arranging or street sweeping of hardstand/roads when required;
- maintain effectiveness of wheel wash by monitoring water levels and the removal of sedimentation when necessary;
- arranging for watering of the site access road to reduce dust when appropriate;
- regular monitoring of green waste material for odour management purposes (consistent with Section 4.2);
- cleaning of the waste storage/processing areas;
- arranging the removal of residual waste;
- completion of a complaint form if a dust or odour complaint is received; and
- coordinating with the Site Manager to ensure the complaint is investigated.

The Site Manager is responsible for:

- implementing this AQMP;
- auditing the site on a regular basis to ensure compliance with the operational environmental management plan (OEMP) for air and odour emissions;
- coordinating investigation of the dust or odour complaints with the Facility Foreman;
- documenting the results of the investigation and actions taken;
- maintaining the records of the dust and odour complaints;
- liaison with the complainant regarding the steps to be taken to minimise further air pollution emissions where appropriate; and
- ensuring that the nominated officers have been trained in the requirements of this procedure.

5.2 Ambient air quality monitoring

The development consent conditions do not feature any requirement for ambient air quality monitoring at the facility.

5.3 Complaints reporting

Any complaint received by the Applicant regarding dust or odour impacts from the facility will be acted on within 24-hours in the following manner:

- details of the complaint (date, time, specifics, complainants contact details) will be noted;
- activities occurring during the complaint period to be investigated;
- log findings of operations during the complaint period in the complaints register;
- review relevant management practices as necessary;
- respond to complainant with findings of the review;
- the details of any dust-related complaint will be logged in an appropriate register, with investigation findings and actions noted;
- a record of a complaint must be kept for at least four years after the complaint was made and must be produced to any authorised officer of a relevant regulatory agency who asks to see them; and
- all complaints received will be listed in the Environment Protection Licence (EPL) Annual Return.

5.4 Air quality incident definition and response

For the purpose of this AQMP, a verified complaint that is deemed to be the direct result of operational emissions from the facility will be classified as an air quality incident. On becoming aware of an air quality incident, the Applicant will notify DPIE in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of an incident. Notification requirements are outlined in Section 5.5 of the OEMP for the facility.

Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant will provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.

5.5 Key performance indicators

The Applicant commits to the following key performance indicators (KPIs) to demonstrate the performance of ongoing dust and odour control management practices at the facility:

- successful implementation of the control measures in accordance with Chapter 5 and Appendix 2 of the development consent conditions; and
- no confirmed air quality-related complaints from the operation of the facility.

In the event that KPIs are not met, air pollution mitigation measures and management practices will be reviewed and amended as necessary.

5.6 Review of AQMP

A comprehensive review of the complaint and incident records will be completed as part of the project annual review of operations, and each year thereafter, and will be provided to DPIE.

In accordance with Condition C8, the AQMP will be reviewed and revised (if necessary) within three months of the following:

- approval of any modification of the conditions of the consent;
- submission of an incident report under Condition C11;
- completion of an Independent Environmental Audit under condition C16; and/or
- the issue of a direction of the Planning Secretary under condition A2(b) which requires a review.

Any modifications to the AQMP will be undertaken in consultation with the appropriate government agencies.

References

EMM 2018. *Response to Submissions - Penrith Waste Recycling and Transfer Facility*. November 2018

NSW Government Department of Planning, Industry and Environment 2020. *Stage Significant Development (SSD) Consent (Ref: SSD 7733)* (approved 15 May 2020).

Ramboll Australia 2018. *Penrith Waste Recycling and Transfer Facility. Air Quality and Greenhouse Gas Assessment*.

APPENDIX F – OPERATIONAL TRAFFIC MANAGEMENT PLAN

Operational Traffic Management Plan

46-48 Peachtree Road, Penrith

Prepared for Benedict Recycling Pty Ltd
March 2021

EMM Sydney
Ground floor, 20 Chandos Street
St Leonards NSW 2065

T 02 9493 9500
E info@emmconsulting.com.au

www.emmconsulting.com.au

Operational Traffic Management Plan

46-48 Peachtree Road, Penrith

Report Number

J16099 RP15

Client

Benedict Recycling Pty Ltd

Date

17 March 2021

Version

v2 Draft

Prepared by

Abdullah Uddin
Associate Traffic Engineer
17 March 2021

Approved by

Dr Timothy Brooker
National Technical Leader - Traffic & Transport
17 March 2021

Table of Contents

Attachments

Tables

Figures

Plates

1 Introduction

1.1 Context

EMM Consulting Pty Limited (EMM) has been engaged by Benedict Recycling Pty Ltd to prepare an Operational Traffic Management Plan (OTMP) to detail the proposed site operations of their Waste Recycling and Transfer Facility at 46-48 Peachtree Road, Penrith.

1.2 Development consent

The development application (SSD 7733) was approved by Department of Planning, Industry and Environment (DPIE) in May 2020.

1.3 Purpose and objectives

This OTMP was prepared to satisfy the consent conditions, specifically conditions B11, B14 and B15. The site will not operate until this OTMP is approved by the Planning Secretary.

1.4 Report preparation

This report has been prepared by Abdullah Uddin who has 17 years of experience in the traffic engineering and transport planning industry in Australia.

1.5 Consultation

EMM has prepared this OTMP based on:

- reviews of relevant documentation specific to site traffic management including site plans and maps; and
- discussions with Benedict Recycling staff; and
- consultation with Penrith City Council.

2 Environmental requirements

2.1 Legislative framework

The legislation that applies to the implementation of this OTMP is listed below:

- *Environmental Planning and Assessment Act 1979*;
- *Roads Act 1993*;
- *Road Transport Act 2013*;
- *Work Health and Safety Act 2011*; and
- *NSW Road Rules 2008*.

2.2 Standards and guidelines

The following are the guidelines relevant to this OTMP:

- Manual of Uniform Traffic Control Devices: AS1742;
- Austroads Guide to Traffic Management; and
- RMS (now TfNSW) Traffic Control at Worksites, Issue 6, October 2020.

2.3 Approval conditions

The development application (SSD 7733) is approved by DPIE. The relevant approval conditions and EMM's responses are provided in Table 2.1.

Table 2.1 Consent conditions and EMM responses

Condition No	Condition	Relevant report section
B11	**The Applicant must ensure:**	
(a)	internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004) and AS 2890.2:2002 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2002);	Section 5.4
(b)	the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines;	Section 5.13 and Attachment A
(c)	the development does not result in any vehicles queuing on the public road network;	Section 5.9
(d)	heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site;	Section 5.4

Table 2.1 Consent conditions and EMM responses

Condition No	Condition	Relevant report section
(e)	all vehicles are wholly contained on site before being required to stop;	Section 5.9
(f)	all loading and unloading of materials is carried out on-site;	Section 5.2
(g)	all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; and	Sections 5.8 and 6.6
(h)	the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.	Section 5.4
B14	**Prior to the commencement of operation, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by condition C5 and must:**	
(a)	be prepared by a suitably qualified and experienced person(s);	Section 1.4
(b)	be prepared in consultation with Council;	Sections 1.5 and 2.4
(c)	detail the measures that are to be implemented to ensure road safety and network efficiency;	Section 5
(d)	detail heavy vehicle routes, access and parking arrangements;	Access arrangements are discussed in Section 5.1; truck parking arrangements are discussed in Section 5.4; the haulages routes are discussed in Section 5.12
(e)	include a Driver Code of Conduct to: (i) minimise the impacts on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; (iv) ensure truck drivers use specified haul routes; and	Section 6
(f)	include a Traffic Control Plan detailing: (i) the on-site measures to be implemented to control the manoeuvring of vehicles in designated areas, including front-end loaders within the waste storage building; (ii) installation of way-finding signage and line marking; and	Section 5.14
(g)	include a program to monitor the effectiveness of these measures.	Section 4.2
B15	**The Applicant must:**	
(a)	not commence operation until the OTMP required by condition B14 is approved by the Planning Secretary; and	Section 1.3
(b)	The Applicant must ensure the OTMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development.	Section 4.1and 4.2

2.4 Penrith City Council's comments and responses to Draft OTMP

Penrith City Council has reviewed the draft OTMP and provided comments. All Council's comments and EMM's responses are provided in Table 2.2. The email correspondence is provided in Attachment B.

Table 2.2 Council's comments and EMM's responses

Council's comment	EMM Response and relevant report section
Just as a general question initially, can you please provide me with the final approved set of architectural plans (with regard to the driveway to be constructed) to ensure that the driveway widths and splays depicted in the swept path diagrams of the OTMP are consistent with driveway dimensions and splays on the final set of plans. If you could send these at your earliest convenience that would be appreciated as it pertains significantly to my comments regarding the finalisation of this OTMP. Also please provide the plan featuring dimensions of parking spaces/parking areas so as to satisfy Condition B11 (a) with regard to compliance with AS2890.1.	A copy of the approved plans, with dimensions of parking spaces, was provided to Council on 11 March 2021.
Section 4.2 - What specifically does the program to monitor the effectiveness of these measures entail with regard to Condition B14 (g)? This needs to be specifically outlined, not just mentioned. How will it be monitored and when/how often? What is the process?	This has been discussed in Section 4.2.
Section 4.3 – Managers and supervisors – the wording of the line that states "ensure that the OTMP is reviewed to monitor its effectiveness on a regular basis" must be changed to the following wording, "ensure that the OTMP is reviewed to monitor its effectiveness on a regular basis, but must not revoke or remove those items and procedures pertaining to the satisfaction of the Development Conditions". Please also include in this section that the OTMP is not to be altered without written concurrence from Council's Engineering Services Department.	This has been discussed in Section 4.3.
Section 5.3 – Operating Hours (as well as Page 16 – 5.11 - Traffic Generation) – how will the management ensure/regulate that vehicle arrivals are distributed throughout the day so as to avoid numbers of heavy vehicles arriving at the same time causing queuing into the public roadway. This detail needs to be included in the OTMP as a matter of importance. It pertains to satisfaction of Condition B14 (c) which must be fully addressed in the OTMP. Even though this is addressed in Section 5.9 of the OTMP (on page 15), this section only advises of expected arrival rates during peaks, but it the OTMP needs to explain how the site management will co-ordinate truck arrivals with regard to contractors and others accessing the site. Will there be a booking/appointment system (for example)? This must be demonstrated.	This has been discussed in Section 5.11.
Fig. 5.2 – OTMP must state clearly that the designated truck parking area (shown in Fig 5.2) is to be kept clear of obstruction at all times so as to be set aside for the parking of trucks only and used solely for that purpose. The truck parking bays will need to be linemarked as such and this also needs to be shown and stated in the OTMP. Also, staff and visitor car parking spaces are to be linemarked and kept clear of obstructions at all times solely for the use of parking vehicles (not for storage of materials/waste materials, etc.). This all needs to be clearly and specifically outlined in writing in the OTMP.	This has been discussed in Section 5.4.

Table 2.2 Council's comments and EMM's responses

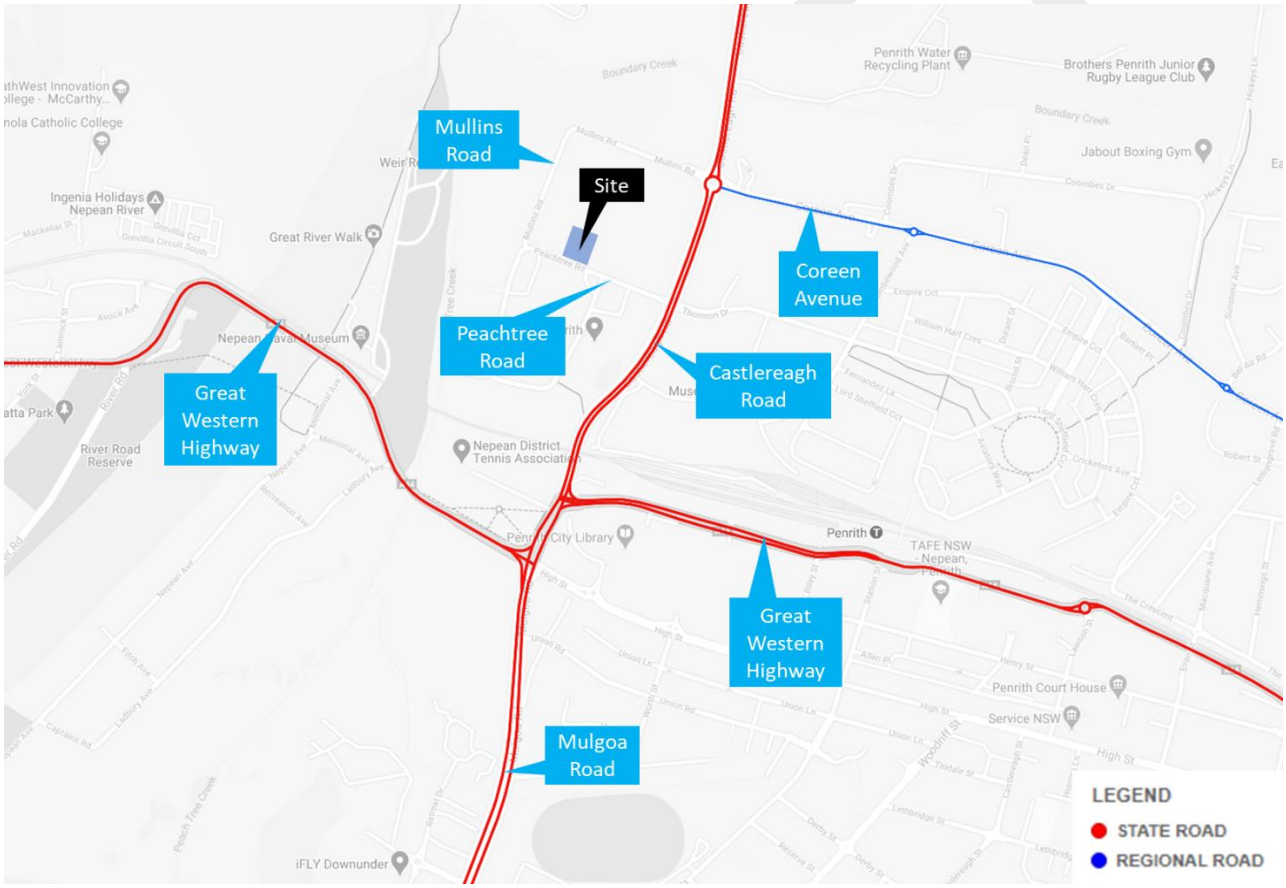
Council's comment	EMM Response and relevant report section
Section 5.11 – Traffic Generation – With regard to daily truck numbers/ trips, how these will be managed in order to demonstrate satisfaction of Operating Condition B11(c)?	This is addressed in Section 5.9.
Section 5.13 - States that vehicles over 19m in length are not permitted. The OTMP should state clearly that B-Doubles, Oversize vehicles, Truck & Dog (PBS) vehicles over 19m in length are not permitted to access the site for the life of the development.	This is addressed in Section 5.13.
Section 5.12 - Haulage Routes makes no mention of Mullins Road. Please review this detail. Will there be circumstances where this route is used to access Castlereagh Rd? Does this play a role in managing arrivals and departures of vehicles to avoid traffic congestion? This also relates to Tables 3.1 to 3.5 in the OTMP (pages 5 to 9) and the section dealing with the road network (Section 3, page 4). Please review and advise Council accordingly. This relates also to Condition B14 (e) (iv). It also relates to daily truck numbers/ trips and how these will be managed in order to demonstrate satisfaction of Operating Condition B11(c), see also my comments above regarding Section 5.11.	This is addressed in Sections 3 and 5.12.
Section 5.4 – Car and Truck Parking - must stipulate clearly that internal manoeuvring areas are to be kept clear at all times and not to be used for parking.	This is addressed in Section 5.4.
Section 5.13 – Please clearly demonstrate satisfaction of Austroads requirements with regard to accessing the public road.	This is addressed in Section 5.13.
Section 5.14 – Traffic Control plan must stipulate clearly that internal manoeuvring areas are to be kept clear at all times and not to be used for storage of materials/waste materials/etc.	This is addressed in Section 5.14.
Section 6 – Driver Code of Conduct – Must include specific direction to truck drivers not to park on-street/on verges/on footpaths in the vicinity of the site or when accessing the site and not to load/unload from the public roadway when accessing the site.	This is addressed in Section 6.2.

3 Road network

The NSW administrative road hierarchy comprises the following road classifications, which align with the generic road hierarchy as follows:

- State roads – freeways and primary arterials (TfNSW managed);
- regional roads – secondary or sub arterials (council managed and part funded by the State); and
- local roads – collector and local access roads (council managed).

An overview of each of the key roads which are shown in Figure 3.1, is provided in the tables and photographs in this chapter.



Source: Carto

Figure 3.1 Road hierarchy near site

Table 3.1 Peachtree Road

Aspect	Description
Road classification and connectivity	Local road connecting Castlereagh Road to the east and Mullins Road to the west
Alignment	A closed loop
Number of lanes	One lane each way, with on street parking on both sides of the road
Carriageway type	Sealed road
Carriageway width	Approximately 12 m
Default speed limit	50 km/h
Heavy vehicle access	26 m B-double approved
Traffic function	Provides local access to the industrial estates

Plate 3.1 Peachtree Road looking west from the site access

Table 3.2 Castlereagh Road

Aspect	Description
Road classification and connectivity	State road between Great Western Highway and Cranebrook Road, as well as between Springwood Road and Kurrajong Road; regional road between Cranebrook Road and Springwood Road
Alignment	Generally north/south
Number of lanes	Two lanes each way south of McCarthys Lane, Penrith; one lane each way north of McCarthys Lane, Penrith
Carriageway type	Sealed road; dual carriageway with central median island south of Andrews Road, Penrith
Carriageway width	Approximately 21 m between kerbs south of Andrews Road and approximately 7 m north of Andrews Road
Posted speed limit	60 km/h near Peachtree Road
Heavy vehicle access	26 m B-double approved
Traffic function	Provides arterial connection

Source: Google Maps

Plate 3.2 Castlereagh Road looking north from Peachtree Road

Table 3.3 Mullins Road

Aspect	Description
Road classification and connectivity	Local road connecting Peachtree Road to the south and Castlereagh Road to the east
Alignment	L-shape
Number of lanes	One lane each way, with on street parking on both sides of the road
Carriageway type	Sealed road
Carriageway width	Approximately 12 m
Default speed limit	50 km/h
Heavy vehicle access	26 m B-double approved
Traffic function	Provides local access to the industrial estates

Source: Google Maps

Plate 3.3 Mullins Road looking north from Peachtree Road

Table 3.4 Coreen Avenue

Aspect	Description
Road classification and connectivity	Regional road connecting Castlereagh Road and Richmond Road
Alignment	East/west
Number of lanes	One lane each way
Carriageway type	Sealed road with parking lanes on both sides of the road
Carriageway width	Approximately 12 m with 3.3 m travel lanes and 2.7 m parking lanes
Posted speed limit	60 km/h
Heavy vehicle access	26 m B-double approved
Traffic function	Provides regional and local connection

Source: Google Maps

Plate 3.4 Coreen Avenue looking east from Castlereagh Road

Table 3.5 Great Western Highway

Aspect	Description
Road classification and connectivity	State road connecting Parramatta Road in Granville and Russell Street in Emu Plains
Alignment	Generally east/west
Number of lanes	Two lanes each way near Castlereagh Road
Carriageway type	Sealed road with central median island
Carriageway width	Approximately 12 m with 3 m travel lanes near Castlereagh Road
Posted speed limit	50 km/h in the developed areas and 60 km/h undeveloped areas
Heavy vehicle access	26 m B-double approved
Traffic function	Provides arterial connection

Source: Google Maps

Plate 3.5 Great Western Highway looking east from Castlereagh Road

Table 3.6 Mulgoa Road

Aspect	Description
Road classification and connectivity	State road between Great Western Highway, Penrith and Park Road, Wallacia
Alignment	Generally north/south
Number of lanes	Two lanes each way east of Glenmore Parkway; one lane each way west of Glenmore Parkway
Carriageway type	Sealed road; dual carriageway with central median island east of Glenmore Parkway
Carriageway width	Approximately 24 m east of Glenmore Parkway with 3.5 m travel lanes; approximately 7 m west of Glenmore Parkway
Posted speed limit	60 km/h near Great Western Highway
Heavy vehicle access	26 m B-double approved
Traffic function	Provides arterial connection

Source: Google Maps

Plate 3.6 Mulgoa Road looking south from Great Western Highway

4 Site responsibilities

4.1 Legislative requirements

Benedict Recycling has a duty to ensure, so far as is reasonably practicable, workers and others are not exposed to health and safety risks arising from the business or undertaking at the site. This duty starts at the with the General Manager and includes identifying and implementing control measures to prevent people being injured by moving vehicles at the workplace contained within this OTMP.

4.2 General Manager and Operations Manager

It is the responsibility of the General Manager and Operations Manager to:

- ensure the overall implementation of, and compliance with, the OTMP for the site;
- ensure the timely communication of the contents and requirements of the OTMP to all relevant employees, delivery drivers and contractors;
- ensure that all hazards, unsafe acts or incidents involving traffic movement or pedestrians at the site are reported (including in accordance with any legislative requirements) and corrective action(s) are promptly implemented;
- provide adequate support, clarification and guidance to all personnel conducting operational activities in mitigating traffic management risks; and
- ensure that the OTMP is reviewed to monitor its effectiveness after first twelve months, and then the frequency will be determined following the outcome of the first review. The review would cover any formal complaints, safety incidents, toolbox meeting discussions pertinent to improvements, as well as driver and operator feedback. Draft adjustments to the OTMP, which must not revoke or remove those items and procedures pertaining to the satisfaction of the Development Conditions, would then be submitted to Council for consideration and approval. The OTMP is not to be altered without written concurrence from Council's Engineering Services Department.

4.3 Managers and supervisors

It is the responsibility of the site managers/supervisors to:

- implement, comply and monitor the requirements of the OTMP for the site;
- conduct training and communication of the OTMP to all personnel, delivery drivers and contractors;
- ensure the safe and efficient loading and unloading activities and co-ordinate their arrival and dispatch from designated loading/unloading areas;
- ensure that any hazards, unsafe acts or incidents involving traffic movement are reported (including any legislative requirements to report) and corrective action(s) are implemented for their area; and
- provide support and guidance to all personnel conducting operational activities in mitigating traffic management risks.

4.4 Load shifting equipment operators

It is the responsibility of load shifting equipment operators to:

- not be under the influence of drugs or alcohol whilst operating load shifting equipment vehicles;
- maintain the appropriate licence(s) for the operation of the load shifting equipment;
- undertake pre-operational checks on load shifting equipment prior to use;
- report any load shifting equipment hazards or faults to your direct manager or operations manager;
- keeping a safe distance (approximately 5-10 m or whichever is reasonably practicable) from tip yard inspector and weighbridge operators interacting with moving equipment;
- always ensure Ultra High Frequency (UHF) Radio is on and you can hear all safety communications from weighbridge operators, tipping inspectors and equipment operators;
- observe and comply with the requirements of this OTMP at all times including but not limited to Safety Warning Signage, communication devices, and loading and unloading requirements; and
- report any traffic management hazards, unsafe act or incidents immediately to the relevant Site Manager/Site Supervisor.

4.5 Delivery vehicle operators

It is the responsibility of delivery vehicle operators to:

- not be under the influence of drugs or alcohol whilst operating vehicles;
- ensure the appropriate licence(s) are held for the operation of the vehicle;
- undertake pre-operational checks on delivery vehicles prior to use;
- report any delivery vehicle or loading equipment hazards or faults to your direct manager or operations manager;
- keeping a safe distance (approximately 5-10 m or whichever is reasonably practicable) from tip yard inspector, weighbridge operators and pedestrians interacting with the delivery vehicles;
- always ensure UHF Radio is on and you can hear all safety communications from Weighbridge operators, tipping inspectors and equipment operators;
- observe and comply with the requirements of this OTMP at all times including but not limited to Warning Safety Signage, communication devices, and loading and unloading requirements; and
- report any traffic management hazards, unsafe act or incident immediately to the relevant Site Manager/Site Supervisor.

4.6 Other Benedict Recycling employees

It is the responsibility of all Benedict Recycling employees working at the site to:

- observe, understand and comply with the requirements of this OTMP at all times including but not limited to parking areas internal and external to the site, pedestrian access to the office areas, neighbouring businesses plant and equipment and loading and unloading areas; and
- report any traffic management hazards, unsafe act or incident immediately to the Site Manager/Site Supervisor.

5 Traffic management

5.1 Site access

Drivers and pedestrians are to obey all signage upon entry, advising of pedestrians on site, and that drivers must give-way to pedestrians. It is understood there will not generally be any pedestrians on site, except the site personnel, and site visitors within the hand-unloading area (in the north-east corner of the site).

The site is accessed via the eastern driveway and exited via the western driveway (Figure 5.1).

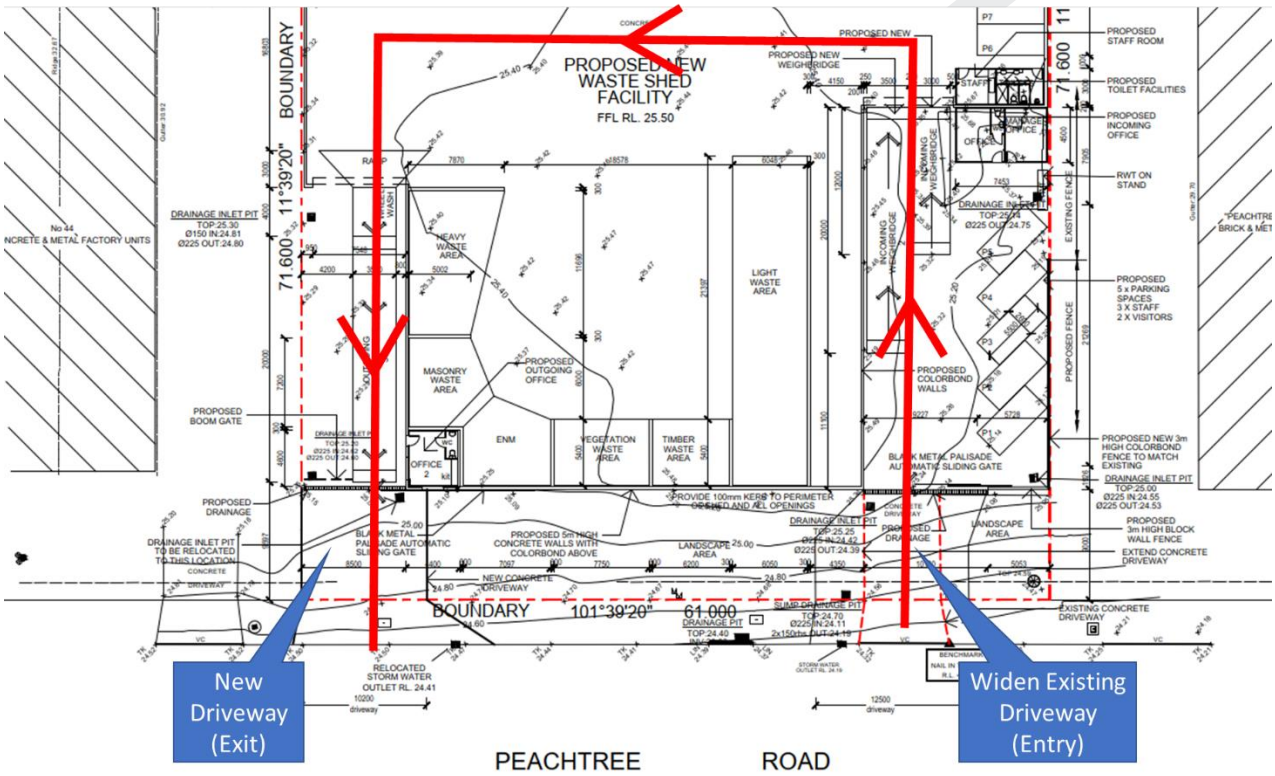


Figure 5.1 Site accesses

There is no pedestrian footpath on the side of the road which minimises any potential vehicular/pedestrian conflict.

5.2 Site operation

The site access and circulation has been designed to operate in a safe manner.

Truck movements shall occur in an anti-clockwise direction after entering the site and all loaded trucks exiting the site are required to utilise the wash bay and weighbridge (Figure 5.2). Site offices are located next to the entry and exit weighbridges. Heavy and light vehicles will utilise the same vehicular path. Allocated parking is mostly for the staff members who generally arrive before the start of the operation of the facility and during the operation, their parked cars will generally remain at the same locations. Hence, the likelihood of light and heavy vehicular conflict is minimal. The truck tipping area (unloading area), hand unload area and waste storage bays (loading area) are wholly within the shed building.

All Benedict Recycling staff, equipment operators and the majority of truck drivers using the facility will have access to UHF Radio when working and utilising the site. The hand unload customers will not have access to UHF Radio and they will unload in a separate area (see Figure 5.2) to increase safety. The use of UHF radios will ensure adequate communication with the heavy vehicles, equipment operators, tipping inspectors and weighbridge operators when accessing and egressing the site. All Benedict Recycling workers conducting traffic control of heavy vehicles will be trained and hold a relevant TfNSW accredited Traffic Control Licence.

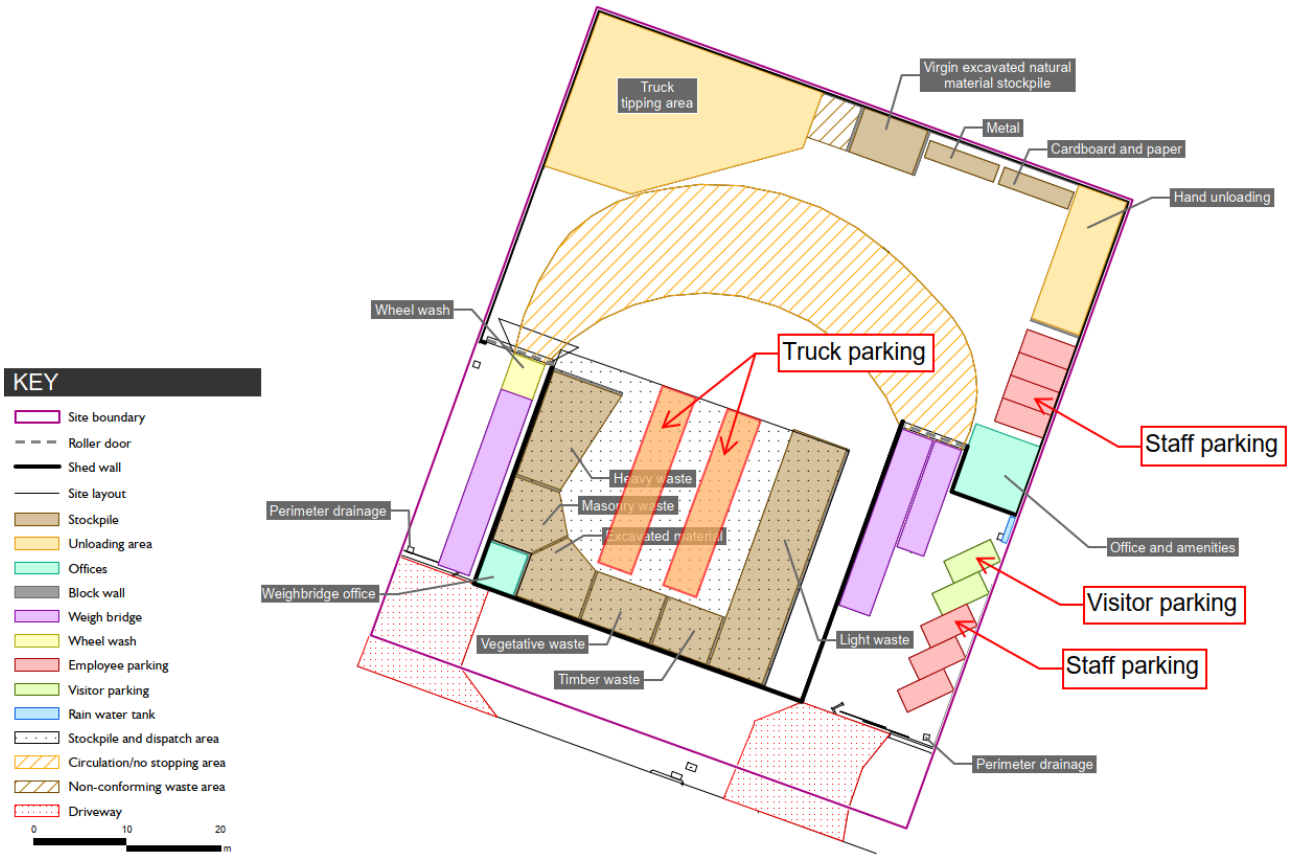


Figure 5.2 Site layout

5.3 Operating hours

The hours of operation will be restricted by the development consent as follows:

- Deliveries and dispatching
  - 6 am to 10 pm Monday to Friday
  - 6 am to 6 pm Saturday
  - 8 am to 4 pm Sunday
- Material sorting or processing
  - 6 am to 10 pm Monday to Friday
  - 7 am to 6 pm Saturday

- Condition A9 of the Consent permits the Applicant to carry out activities including receipt, dispatch and sorting of waste, 24 hours, 7 days per week for a continuous two-week period for a maximum of six times per calendar year, subject to the following:
    - the two-week periods cannot be consecutive, and must be at least two weeks apart;
    - the two-week period includes weekdays, weekends and public holidays;
    - the licensee must notify the EPA and the Planning Secretary at least 24 hours prior to commencing each two-week period; and
    - the licensee must notify the EPA and the Planning Secretary of any complaints received during the two-week period as soon as possible after the complaint is made.

5.4 Car and truck parking

The car parking areas are to be constructed as per the approved car parking arrangement plans which satisfy the relevant Australian Standards. The car parking spaces are to be linemarked and kept clear of obstructions at all times. Cars are to be parked in the designated parking area.

Truck parking spaces are provided within the shed for the purpose of loading during operating hours. Trucks will park in these locations prior to being loaded, then depart following loading. Heavy vehicles are not to be parked on local roads or footpaths in the vicinity of the site.

The internal manoeuvring areas will be kept clear during operating hours to allow for efficient site operation.

Bins associated with the development are not to be placed on the roads and footpaths.

5.5 Pedestrians and visitors

All pedestrians and visitors must report to the site office before entering the site. Pedestrian access within the site is proposed to be restricted to the hand unloading area (in the north east corner of the site) and the site office and amenities building.

Pedestrians should proceed with caution in these areas. The weighbridge operator will advise the tipping inspector of any pedestrians in the shed and they will advise drivers of heavy vehicles and the equipment operators. Pedestrians should ensure they can be visibly seen and that eye contact is made with all nearby heavy vehicle operators when walking into the shed or interacting in any way with heavy vehicles and mobile plant within the shed.

5.6 Tipping area

The tipping area is managed by the tipping inspector and is where heavy vehicles and plant operators will interact whilst unloading waste and the waste is inspected. The use of UHF Radios as a communication control measure will significantly reduce the risk of vehicular/pedestrian conflict. There needs to be constant communication between the tipping inspector, load shifting plant/equipment and heavy vehicles loading/unloading within the tipping area.

All site workers must not approach mobile plant and equipment within 10 m (where practicable) until UHF or signalling the operator and they have understood and agreed to their request to approach. Mobile plant operators must also stay 10 m (where practicable), away from other site workers until they have been advised by the worker that they are aware of the proposed plant movement.

Mobile plant operators/heavy vehicle drivers must not to get out of their vehicles in the weighbridge area or in the tipping area unless a spotter is present and all clear is given by the relevant weighbridge operators.

No other Benedict Recycling worker or site visitor shall enter the tipping area unless they are accompanied by a tipping inspector with a UHF Radio.

Workers should never hand sort waste materials in this area.

All staff are to be educated through the WHS induction process and be made aware of mobile plant operator blind spots.

5.7 Weighbridges

There are two entry weighbridges and one exit weighbridge. The two entry weighbridges are to facilitate different type of trucks arriving at the same time and to minimise any potential queuing on the public roads. The two entry weighbridges are inground and will be flushed into the ground. The exit weighbridge has a wheel wash located before it with a short ramp. In addition to the exit weighbridge, there is also a bypass lane, for vehicles that do not require weight measuring and wheel wash, such as staff and hand unload vehicles.

If there is a need for any queuing of vehicles waiting to enter the tipping area, the weighbridge operator and tipping inspector will ensure that all heavy vehicles are stopped at an appropriate area past the weighbridge (within the shed) to allow other heavy vehicles within the tipping area to tip and then exit. Constant communication on UHF Radio is required between weighbridge operator, tipping inspector and all load shifting plant/equipment, as well as heavy vehicles waiting to progress into the tipping area.

5.8 Wheel wash bay

A wheel wash bay is provided just before the exit weighbridge (Figure 5.2).

5.9 Queuing

The entry weighbridges will be used by the light vehicles (including hand unload vehicles) and inbound heavy vehicles. As estimated in the TIA, the site will generate the following relevant peak hourly traffic movements:

Table 5.1 Peak hourly traffic movements using the entry weighbridges

Peak hour	Light vehicles		Heavy vehicles	Total
	Inbound (hand unload vehicles)	Outbound (visitor and staff vehicles)	Inbound	
AM peak	9	0	8	17
PM peak (single shift operations – 6 am to 4 pm)	2	5	2	9
PM peak (double shift operations when there is after hour deliveries – 6 am to 2 pm & 2 pm to 10 pm)	4	2	4	10

The data in the above table shows that during the AM peak there will be maximum 17 vehicles arriving to the site in that hour. This equates to one vehicle in every three minutes. Multiple vehicles could arrive at the same time in the peak. Queuing is only analysed during the peak periods of the day as there will be less traffic and less chance of queuing for the rest of the working day.

For the purpose of the queuing analysis, it should be noted that the length between the front of the entry weighbridges and the site boundary is 31 m. There is also ample space, say 20 m, within the shed facility leading to the tipping area (past the entry weighbridges) where vehicles can queue. Collectively, the facility provides, two separate queues with over 102 m queuing length capacity within the site. This queuing capacity will ensure all site entry vehicles can be wholly contained within the site without queuing back onto Peachtree Road.

On another note, there is no pedestrian footpath on the northern side of Peachtree Road, which potentially enables queuing on the driveway crossover (Plate 5.1). However, given the traffic generation during the AM peak hour, it is it would an unlikely situation.

Plate 5.1 Driveway crossover

5.10 Site safety

All visitors must report to the site office before entering the remainder of the site. The speed limit within the site is restricted to 10 km/h.

All Benedict Recycling staff, equipment operators and truck drivers shall have access to UHF Radio when working on site.

All site safety procedures including procedures for trucks and light vehicles, will be signposted near the entrance to the site, near the site office.

5.11 Traffic generation

As estimated in the TIA, the site will generate 194 and 234 daily light and heavy vehicle movements, respectively, for a combined total of 428 daily traffic movements.

Even though truck arrivals cannot be coordinated, it is noted that the majority of customers are regulars and finite, and that they are in the catchment based on distance to jobs. The facility servicing the region will create an efficiency in the road network compared to tipping at other facilities, as there will be overall less truck haulage distance and a smaller number of trucks on the roads.

As discussed in Section 5.9, there is over 102 m queueing capacity which will ensure all site entry vehicles can be wholly contained within the site without queuing back onto Peachtree Road.

5.12 Haulage routes

As stated in the TIA, for the combined waste received and products dispatched traffic movements, the estimated distribution to and from the site would be approximately 50% north and 50% south along Castlereagh Road. It is not expected that waste would be brought to the site or products dispatched via Thornton Drive.

It is also stated in the TIA that the majority of traffic will arrive from/depart to Castlereagh Road via Peachtree Road. Far less development traffic will use Mullins Road as the travel distances are greater.

5.13 Vehicle type

The heavy vehicle types accessing the site varies between an 8.8 m long Medium Rigid Vehicle (MRV) and a 19 m long Articulated Vehicle (AV). The maximum size of vehicle that accesses the site is 19 m long AV.

A swept path assessment has been undertaken at the site access and within the site using a 19 m AV which shows adequate manoeuvrability. Upon exit, the largest vehicle will be able to stay on the correct side of the road. Vehicles over 19 m long are not permitted to the site. The swept path assessment is presented in Attachment A.

5.14 Traffic control plan

The proposed site signage and other key elements of the Traffic control plan are shown in Figure 5.3.

Site signage will be installed at the site entry and exit driveways and other key locations to assist with providing direction and warning for drivers and pedestrians at the site entrances and managing on-site vehicle speeds.

Additional signs in key areas of the site will be used to warn drivers and pedestrians of the potential vehicular/pedestrian interactions and also the need for using UHF Radio when entering these areas of the site.

Additional Internal speed limit signs are to be installed at prominent locations throughout the site to advise drivers that the general site speed limit is 10 km/h.

The internal maneuvering areas are to be kept clear at all operating times and not to be used for storage of materials, waste materials etc.

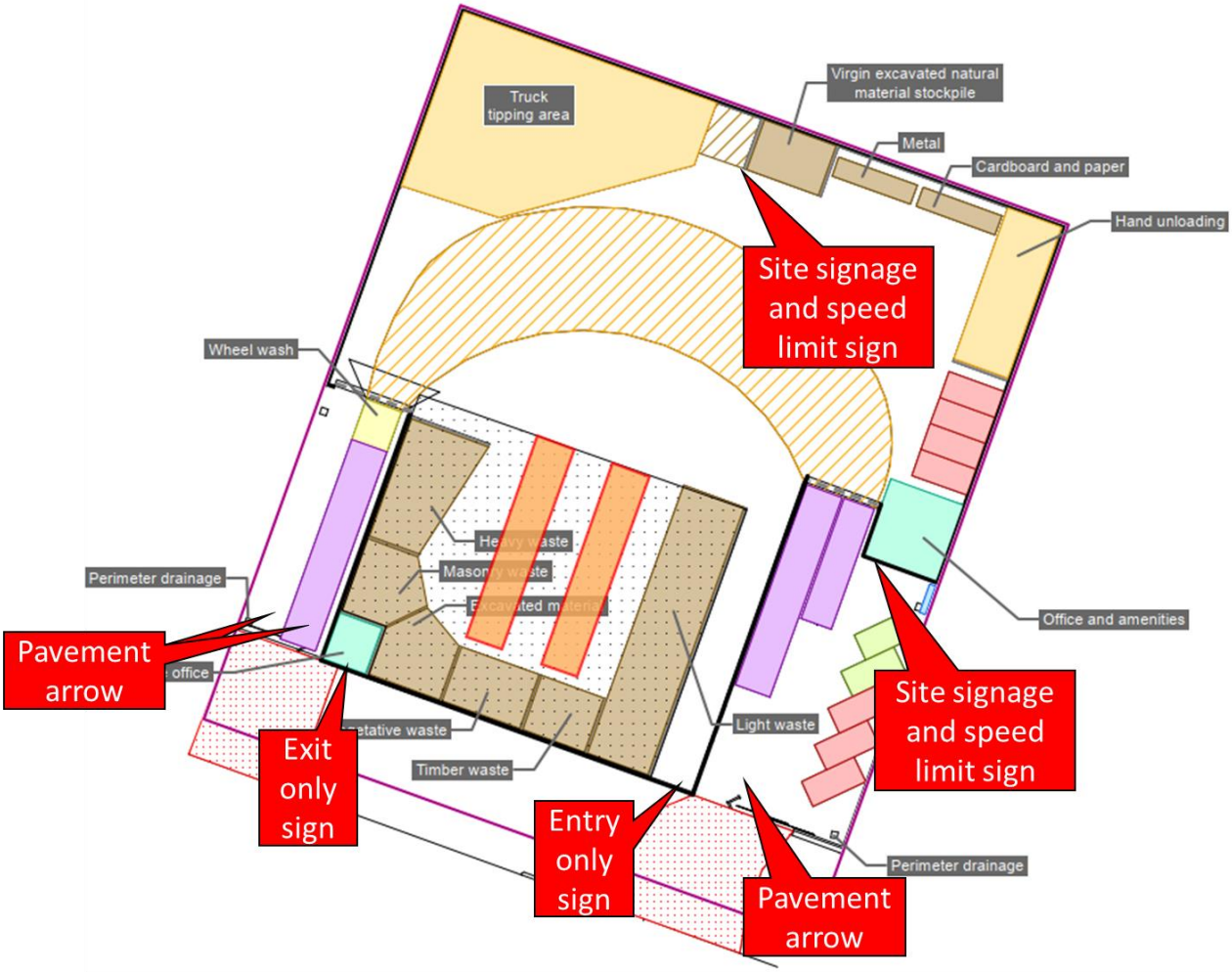


Figure 5.3 Elements of site Traffic Control Plan

5.15 Mobile Plant requirements

The General Manager/Operations Manager are to ensure that all Benedict Recycling mobile plant equipment have the following fully operational safety equipment:

- mirrors;
- reverse beepers;
- flashing light beacons;
- seat belts;
- Roll-Over Protective Structures (ROPS); and
- Falling Object Protective Structures (FOPS).

5.16 Training requirements

In order for this OTMP to be fully effective, all staff, contractors and visitors will need to be aware of the requirements and expectations. This will require a level of education and awareness for all persons that work at or come into contact with the site.

All staff are to be provided with training/awareness sessions with regards to this OTMP. It is compulsory for this training to be provided on induction and then regularly thereafter in toolbox talks and staff meetings.

The key components of this OTMP will also be conveyed regularly and contractors and visitors interacting with the site.

Any workers conducting traffic control of heavy vehicles should be adequately trained as required by the legislation.

6 Driver code of conduct

6.1 Purpose of the code

The Driver Code of Conduct (Code) outlines procedures to ensure that truck drivers adhere to the designated transport routes and implement safe driving practices.

It is a condition of employment and use of the facility that all employees, users and contractors are aware of the Code and that they drive responsibly and adhere to the Code. All drivers will be trained in the requirements of the Code and audits of the compliance with the Code will be regularly conducted. All drivers reported or found to be acting in a manner contrary to the Code will be subject to disciplinary action.

6.2 General requirements

Heavy vehicle drivers accessing the site must:

- undertake a site induction carried out by an approved member of the facility's staff or suitably qualified person under the direction of the facility's management;
- hold a valid driver's licence for the class of vehicle they are driving;
- operate the vehicle in a safe manner within and external to the site;
- adhere to designated transport routes;
- not park on street, verges, or footpaths in the vicinity of the site or when accessing the site;
- not load or unload from the public roadway when accessing the site; and
- comply with all directions of authorised site personnel when within the site.

6.3 Heavy vehicle speed

A speed limit of 10 km/h is applied within the site for all vehicles.

Drivers are to observe the posted speed limits on all public roads 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.

In addition, all drivers and truck operators working for or on behalf of Benedict Recycling are to be made aware of the Three Strikes Scheme (https://www.aic.gov.au/sites/default/files/2020-05/tandi446.pdf) introduced by Australian government which applies to all vehicles over 4.5 tonnes. When a heavy vehicle is detected travelling at 15 km/h or more over the posted or relevant heavy vehicle speed limit by a mobile police unit or fixed speed camera, TfNSW will record a strike against that vehicle. If three strikes are recorded within a three-year period, TfNSW will act to suspend the registration of that vehicle (up to three months).

6.4 Driver fatigue

Fatigue is one of the biggest causes of crashes for heavy vehicle drivers. The National Heavy Vehicle Accreditation Scheme (https://www.nhvr.gov.au/safety-accreditation-compliance/national-heavy-vehicle-accreditation-scheme) allows heavy vehicle operators the choice of operating under three fatigue management schemes:

Standard Hours of Operation; Basic Fatigue Management (BFM); and Advanced Fatigue Management (AFM). All heavy vehicle drivers operating at the site must be aware of their adopted fatigue management scheme and operate within its requirements.

Fatigue includes (but is not limited to) the following:

- feeling sleepy;
- feeling physically or mentally tired, weary or drowsy;
- feeling exhausted or lacking energy; and
- behaving in a way consistent with any of the above.

6.5 Heavy vehicle control

In order to minimise the impact of noise from truck transport, the following controls will apply to truck operators:

- compression brakes not to be used in the vicinity of residential areas;
- tailgates must be locked and secured to avoid noise or spillage;
- always observe the posted speed on site and the local road network;
- no tailgating is permitted – a 3 second gap is to be observed at all times;
- equipment to be used must be fit for the purpose; and
- drivers to obey the operating hours outlined in Section 5.3.

6.6 Load covering

Loose material on the road surface has the potential to cause road crashes and vehicle damage. All loaded vehicles entering or leaving the site are effectively covered for the duration of the trip. The load cover may be removed upon arrival at the delivery site. 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 and again after unloading.

Drivers must ensure that the tailgate is locked before leaving the site. Facility management is to monitor loose material on the side of the vehicle route from facility operations and take appropriate action (removal or suppression) regularly.

6.7 Cleanliness

All loaded vehicles are to be inspected prior to leaving the site for cleanliness. Any materials that could fall on the road should be removed prior to leaving the site. It is noted that all outgoing vehicles will traverse through a wheel wash to ensure contaminants are contained on-site.

6.8 Breakdown and incidents

In the case of a breakdown the vehicle must be towed to the nearest breakdown point as soon as possible. All breakdowns must be reported to the management and the vehicle protected in accordance with the Heavy Vehicle Drivers handbook.

6.9 Complaint management

A complaint management system to engage in active community consultation and maintain positive relations with local residents will be implemented for the site. The purpose of this system is to minimise complaints by addressing their concerns upfront and monitor the environmental performance of the site. The complaint management system is detailed in the site Operational Environmental Management Plan.

6.9.1 Registering complaints

Any enquiries or complaints made by members of the public to site personnel will be directed to the Site Manager.

Complaints may be made to the direct line during business hours. These numbers will be provided on a sign at the site entrance.

6.9.2 Complaint response

Any complaint received regarding noise impacts will be acted on within 24-hours in the following manner:

- details of the complaint (date, time, specifics, complainants contact details) will be recorded;
- activities occurring during the complaint period will be investigated;
- findings of operations during the complaint period will be recorded in the complaints register;
- relevant management practices will be reviewed as necessary; and
- with findings of the review will be communicated to the complainant.

6.9.3 Complaints register

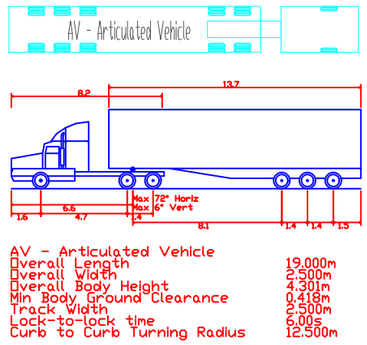
The details of any complaint will be logged in the complaints register, with investigation findings and actions noted. The record of a complaint will be kept for at least 4 years after the complaint was made. The record will be produced to any authorised officer of the EPA who asks to see them.

Should the complaint be relevant to any of the conditions of the Approval, it will be handled as per the Approval conditions relevant to that environmental aspect.

Attachment A

Swept path assessment

COMMENTS | A3



AV - Articulated Vehicle

Overall Length	19.000m
Overall Width	2.500m
Overall Body Height	4.301m
Min Body Ground Clearance	0.418m
Track Width	2.500m
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12.500m

Swept Path Clarification

Red line - Wheel path
Dark green line - Vehicle overhang
Light green line - 300 mm clearance

SYDNEY | Suite 01
Ground Floor
20 Chandos Street,
St Leonards NSW 2065

Phone # 02 9493 9500

www.emmconsulting.com.au

REV	DATE	COMMENT	DRAWN	REVIEWED
2	26/02/21	FOR INFORMATION	EL	AU
1	26/03/20	FOR INFORMATION	EL	AU

PROJECT: Penrith Waste Recycling and Transfer Facility

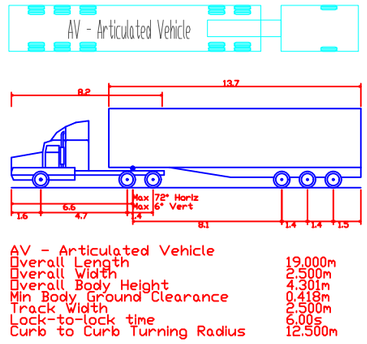
DRAWING TITLE: 19m AV Manoeuvrability

Site Access

CLIENT:	Benedict Recycling Pty Ltd
DRG. #:	EMM-001
PROJECT #:	J16099
SCALE:	1:250

REV: 2

COMMENTS | A3



AV - Articulated Vehicle

Overall Length	19.000m
Overall Width	2.500m
Overall Body Height	4.301m
Min Body Ground Clearance	0.418m
Track Width	2.500m
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12.500m

Swept Path Clarification

Red line - Wheel path
Dark green line - Vehicle overhang
Light green line - 300 mm clearance

EMM creating opportunities

SYDNEY | Suite 01
Ground Floor
20 Chandos Street,
St Leonards NSW 2065

Phone # 02 9493 9500

www.emmconsulting.com.au

REV	DATE	COMMENT	DRAWN	REVIEWED
2	26/02/21	FOR INFORMATION	EL	AU
1	26/03/20	FOR INFORMATION	EL	AU

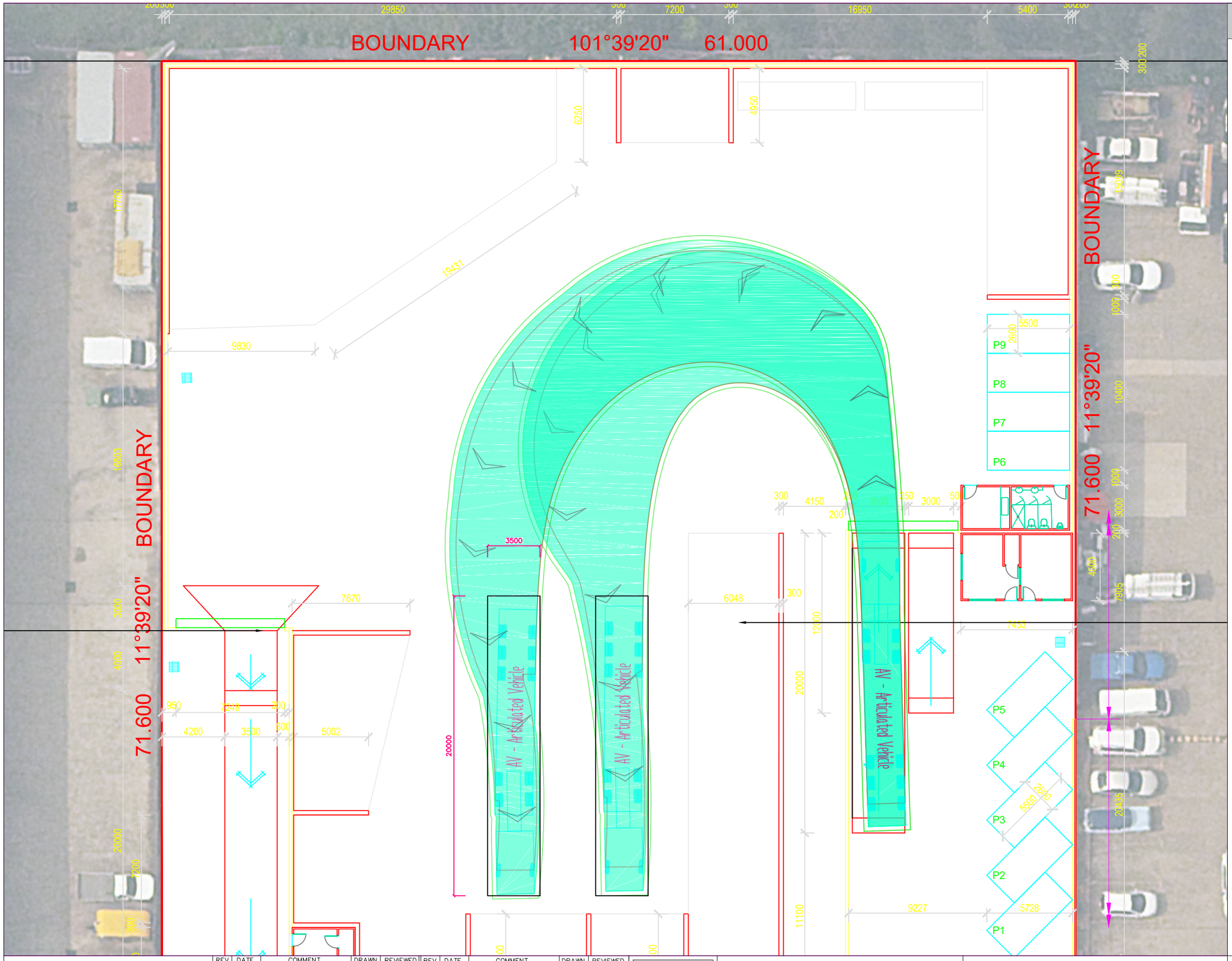
PROJECT:
Penrith Waste Recycling and Transfer Facility

DRAWING TITLE:
19m AV Manoeuvrability

Truck Tipping

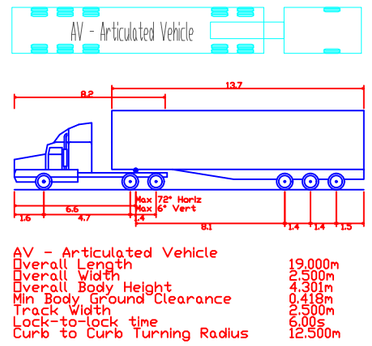
CLIENT:	Benedict Recycling Pty Ltd
DRG. #:	EMM-002
PROJECT #:	J16099
SCALE:	1:250

REV: 2



COMMENTS

A3



AV - Articulated Vehicle

Overall Length	19.000m
Overall Width	2.500m
Overall Body Height	4.301m
Min Body Ground Clearance	0.418m
Track Width	2.500m
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12.500m

Swept Path Clarification

Red line - Wheel path
Dark green line - Vehicle overhang
Light green line - 300 mm clearance

EMM creating opportunities

SYDNEY | Suite 01
Ground Floor
20 Chandos Street,
St Leonards NSW 2065

Phone # 02 9493 9500

www.emmconsulting.com.au

REV	DATE	COMMENT	DRAWN	REVIEWED
2	26/02/21	FOR INFORMATION	EL	AU
1	26/03/20	FOR INFORMATION	EL	AU

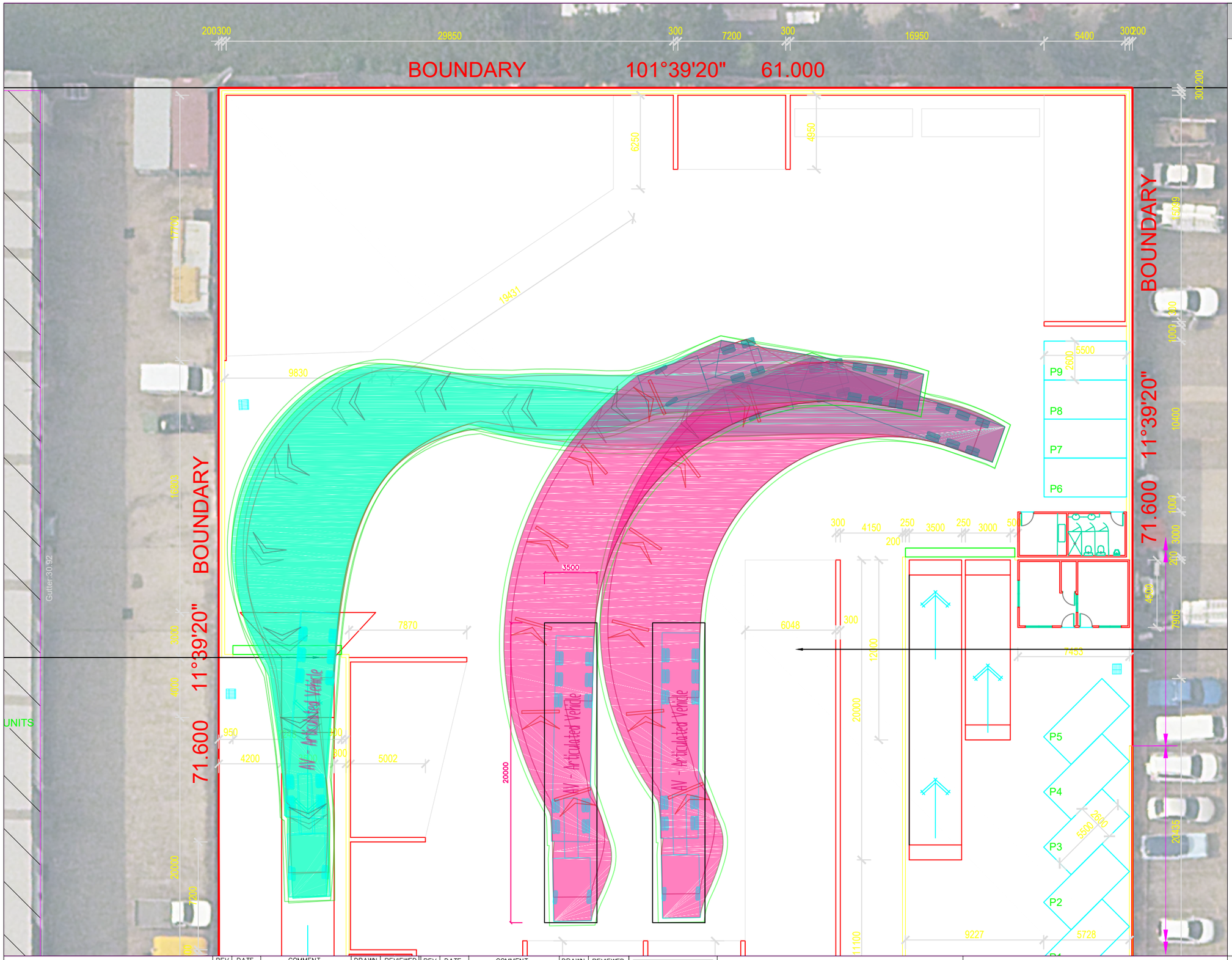
PROJECT:
Penrith Waste Recycling and Transfer Facility

DRAWING TITLE:
19m AV Manoeuvrability

Truck Loading/Parking Area Inbound

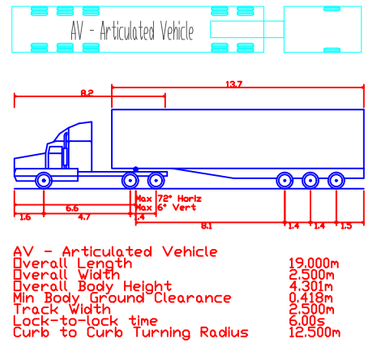
CLIENT:	Benedict Recycling Pty Ltd
DRG. #:	EMM-003
PROJECT #:	J16099
SCALE:	1:250

REV: 2



COMMENTS

A3



AV - Articulated Vehicle

Overall Length	19.000m
Overall Width	2.500m
Overall Body Height	4.301m
Min Body Ground Clearance	0.418m
Track Width	2.500m
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12.500m

Swept Path Clarification

Red line - Wheel path
Dark green line - Vehicle overhang
Light green line - 300 mm clearance

EMM creating opportunities

SYDNEY | Suite 01
Ground Floor
20 Chandos Street,
St Leonards NSW 2065

Phone # 02 9493 9500

www.emmconsulting.com.au

REV	DATE	COMMENT	DRAWN	REVIEWED
2	26/02/21	FOR INFORMATION	EL	AU
1	26/03/20	FOR INFORMATION	EL	AU

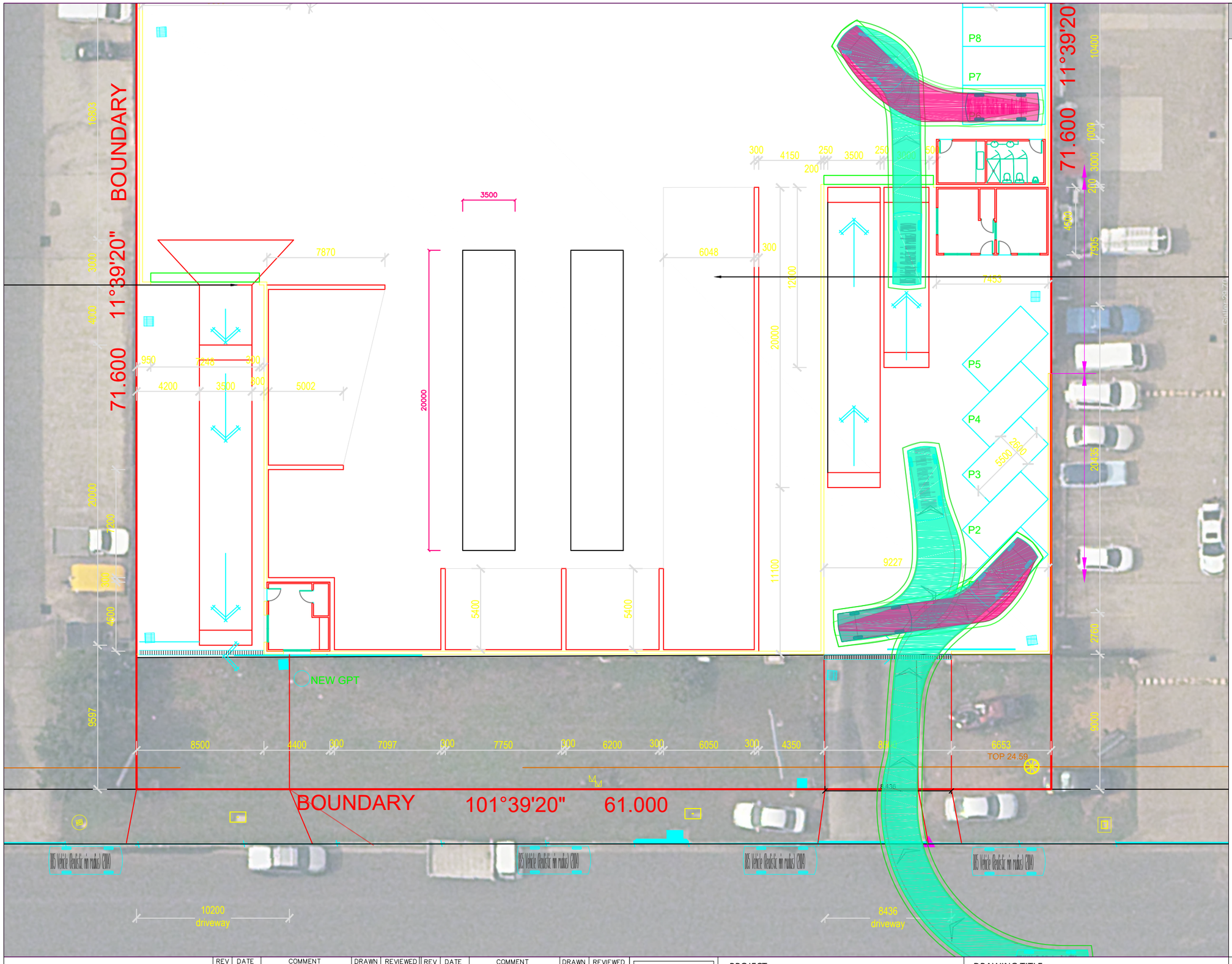
PROJECT:
Penrith Waste Recycling and Transfer Facility

DRAWING TITLE:
19m AV Manoeuvrability

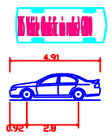
Truck Loading/Parking Area Outbound

CLIENT:	Benedict Recycling Pty Ltd
DRG. #:	EMM-004
PROJECT #:	J16099
SCALE:	1:250

REV: 2



COMMENTS | A3



B85 Vehicle (Realistic min radius) (2004)

Overall Length	4.910m
Overall Width	1.870m
Overall Body Height	1.421m
Min Body Ground Clearance	0.159m
Track Width	1.770m
Lock-to-lock time	4.00s
Curb to Curb Turning Radius	5.750m

Swept Path Clarification

Red line - Wheel path
Dark green line - Vehicle overhang
Light green line - 300 mm clearance

EMM creating opportunities

SYDNEY | Suite 01
Ground Floor
20 Chandos Street,
St Leonards NSW 2065

Phone # 02 9493 9500

www.emmconsulting.com.au

REV	DATE	COMMENT	DRAWN	REVIEWED
2	26/02/21	FOR INFORMATION	EL	AU
1	26/03/20	FOR INFORMATION	EL	AU

PROJECT:
Penrith Waste Recycling and Transfer Facility

DRAWING TITLE:
B85 Car

Maneuvring

CLIENT:	Benedict Recycling Pty Ltd
DRG. #:	EMM-005
PROJECT #:	J16099
SCALE:	1:250

REV: 2

Attachment B

Council's email correspondence

Eric Lei

From: Abdullah Uddin
Sent: Wednesday, March 10, 2021 9:27 PM
To: Eric Lei; Ewen Mckenzie; Phil Towler; Ian Shenton
Subject: FW: Penrith Waste Recycling and Transfer Facility - 46-48 Peachtree Road, Penrith

Hi All, most of the comments are relatively minor.

Eric can have a go and if there are any questions, we will be in touch.

Ian, do you know where the approved plans are showing the driveway and car park?

Best Regards

Abdullah Uddin
Associate Traffic Engineer
EMM
creating opportunities

T 02 9493 9500
M 0425 478 650
E auddin@emmconsulting.com.au
Connect with us

SYDNEY | Ground floor, 20 Chandos Street, St Leonards NSW 2065

From: Daniel Davidson <Daniel.Davidson@penrith.city>
Sent: Wednesday, 10 March 2021 6:57 PM
To: Abdullah Uddin <auddin@emmconsulting.com.au>
Cc: Kablan Mowad <Kablan.Mowad@penrith.city>
Subject: RE: Penrith Waste Recycling and Transfer Facility - 46-48 Peachtree Road, Penrith

Good afternoon Abdullah,

Thank you for sending the draft OTMP through. I have now had time to review it. It is not yet to Council's satisfaction with regard to the relevant DA Conditions. Comments and changes as follows.

Just as a general question initially, can you please provide me with the final approved set of architectural plans (with regard to the driveway to be constructed) to ensure that the driveway widths and splays depicted in the swept path diagrams of the OTMP are consistent with driveway dimensions and splays on the final set of plans. If you could send these at your earliest convenience that would be appreciated as it pertains significantly to my comments regarding the finalisation of this OTMP.

Also please provide the plan featuring dimensions of parking spaces/parking areas so as to satisfy Condition B11 (a) with regard to compliance with AS2890.1.

Further to that, items for amendment within the OTMP are listed below:

Page 10 – Section 4.2 – What specifically does the program to monitor the effectiveness of these measures entail with regard to Condition B14 (g)? This needs to be specifically outlined, not just mentioned. How will it be monitored and when/how often? What is the process?

Page 10 – Section 4.3 – Managers and supervisors – the wording of the line that states "*ensure that the OTMP is reviewed to monitor its effectiveness on a regular basis*" must be changed to the following wording, "ensure that the OTMP is reviewed to monitor its effectiveness on a regular basis, but must not revoke or remove those items and procedures pertaining to the satisfaction of the Development Conditions". Please also include in this section that the OTMP is not to be altered without written concurrence from Council's Engineering Services Department.

Page 13 – Section 5.3 – Operating Hours (as well as Page 16 – 5.11 - Traffic Generation) – how will the management ensure/regulate that vehicle arrivals are distributed throughout the day so as to avoid numbers of heavy vehicles arriving at the same time causing queuing into the public roadway. This detail needs to be included in the OTMP as a matter of importance. It pertains to satisfaction of Condition B14 (c) which must be fully addressed in the OTMP. Even though this is addressed in Section 5.9 of the OTMP (on page 15), this section only advises of expected arrival rates during peaks, but it the OTMP needs to explain how the site management will co-ordinate truck arrivals with regard to contractors and others accessing the site. Will there be a booking/appointment system (for example)? This must be demonstrated.

Page 13 – Fig. 5.2 – OTMP must state clearly that the designated truck parking area (shown in Fig 5.2) is to be kept clear of obstruction at all times so as to be set aside for the parking of trucks only and used solely for that purpose. The truck parking bays will need to be linemarked as such and this also needs to be shown and stated in the OTMP. Also, staff and visitor car parking spaces are to be linemarked and kept clear of obstructions at all times solely for the use of parking vehicles (not for storage of materials/waste materials, etc.). This all needs to be clearly and specifically outlined in writing in the OTMP.

Page 16 – Section 5.11 – Traffic Generation – With regard to daily truck numbers/ trips, how these will be managed in order to demonstrate satisfaction of Operating Condition B11(c)?

Page 16 – Section 5.13 - States that vehicles over 19m in length are not permitted. The OTMP should state clearly that B-Doubles, Oversize vehicles, Truck & Dog (PBS) vehicles over 19m in length are not permitted to access the site for the life of the development.

Page 16- Section 5.12 - Haulage Routes makes no mention of Mullins Road. Please review this detail. Will there be circumstances where this route is used to access Castlereagh Rd? Does this play a role in managing arrivals and departures of vehicles to avoid traffic congestion? This also relates to Tables 3.1 to 3.5 in the OTMP (pages 5 to 9) and the section dealing with the road network (Section 3, page 4). Please review and advise Council accordingly. This relates also to Condition B14 (e) (iv). It also relates to daily truck numbers/ trips and how these will be managed in order to demonstrate satisfaction of Operating Condition B11(c), see also my comments above regarding Section 5.11.

Page 14 – Section 5.4 – Car and Truck Parking - must stipulate clearly that internal manoeuvring areas are to be kept clear at all times and not to be used for parking.

Page 16 – Section 5.13 – Please clearly demonstrate satisfaction of Austroads requirements with regard to accessing the public road.

Page 17 – Section 5.14 – Traffic Control plan must stipulate clearly that internal manoeuvring areas are to be kept clear at all times and not to be used for storage of materials/waste materials/etc.

Page 19 – Section 6 – Driver Code of Conduct – Must include specific direction to truck drivers not to park on-street/on verges/on footpaths in the vicinity of the site or when accessing the site and not to load/unload from the public roadway when accessing the site.

Could you please send me the revisions as soon as available and I will review them asap.

Kind regards,

Daniel Davidson
Senior Traffic Engineer

E Daniel.Davidson@penrith.city
T +612 4732 7735 | F +612 4732 7958
PO Box 60, PENRITH NSW 2751
www.visitpenrith.com.au
www.penrithcity.nsw.gov.au

PENRITH
CITY COUNCIL

Follow us

From: Abdullah Uddin <auddin@emmconsulting.com.au>
Sent: Wednesday, 3 March 2021 8:29 AM
To: Daniel Davidson <Daniel.Davidson@penrith.city>
Cc: Kablan Mowad <Kablan.Mowad@penrith.city>; Phil Towler <ptowler@emmconsulting.com.au>; Ian Shenton <ishenton@emmconsulting.com.au>; Eric Lei <elei@emmconsulting.com.au>
Subject: RE: Penrith Waste Recycling and Transfer Facility - 46-48 Peachtree Road, Penrith

---

Good morning Daniel

Please find attached the OTMP for Penrith Waste Recycling Facility.

We need to get back to the department around mid this month. Hence, we would appreciate your comments by end of next week.

Please feel free to call if you have any questions, clarifications etc.

Best Regards

Abdullah Uddin
Associate Traffic Engineer
EMM creating opportunities

T 02 9493 9500
M 0425 478 650
E auddin@emmconsulting.com.au
Connect with us

SYDNEY | Ground floor, 20 Chandos Street, St Leonards NSW 2065

From: Daniel Davidson <Daniel.Davidson@penrith.city>
Sent: Monday, 22 February 2021 1:57 PM
To: Abdullah Uddin <auddin@emmconsulting.com.au>
Cc: Kablan Mowad <Kablan.Mowad@penrith.city>
Subject: RE: Penrith Waste Recycling and Transfer Facility - 46-48 Peachtree Road, Penrith

Good afternoon Abdullah,

Sorry I missed your call over lunch.

I think, with regard to the issues to be documented in the OTMP, there's probably no need for Council staff to meet onsite at this stage.

I would only ask that the issues to be documented in the OTMP must cover all the aspects outlined in the relevant Consent Conditions, and if there's any of those you'd like to discuss with us please call or email regarding the same.

Is there a timeframe for finalising the initial draft of the OTMP? There may be some specific items to discuss once we have received this.

Kind regards,

Daniel Davidson
Senior Traffic Engineer

E Daniel.Davidson@penrith.city
T +612 4732 7735 | F +612 4732 7958
PO Box 60, PENRITH NSW 2751
www.visitpenrith.com.au
www.penrithcity.nsw.gov.au

PENRITH CITY COUNCIL

Follow us

From: Abdullah Uddin <auddin@emmconsulting.com.au>
Sent: Monday, 22 February 2021 1:44 PM
To: Daniel Davidson <Daniel.Davidson@penrith.city>
Cc: Kablan Mowad <Kablan.Mowad@penrith.city>; Ewen Mckenzie <Ewen@benedict.com.au>; Phil Towler <ptowler@emmconsulting.com.au>; Kate Cox <kcox@emmconsulting.com.au>; Eric Lei <elei@emmconsulting.com.au>
Subject: RE: Penrith Waste Recycling and Transfer Facility - 46-48 Peachtree Road, Penrith

Hi Daniel

Thanks for your email. We will send you the draft report for your comments first covering condition B11.

Just to let you know, we will be visiting the site at 11am tomorrow and it would be great either you or Kablan can be present there so that we can discuss all the issues which we will be documenting in our OTMP report.

Please let us know.

Best Regards

Abdullah Uddin
Associate Traffic Engineer
EMM creating opportunities

T 02 9493 9500
M 0425 478 650
E auddin@emmconsulting.com.au
Connect with us

SYDNEY | Ground floor, 20 Chandos Street, St Leonards NSW 2065

From: Daniel Davidson <Daniel.Davidson@penrith.city>
Sent: Monday, 22 February 2021 11:34 AM
To: Abdullah Uddin <auddin@emmconsulting.com.au>
Cc: Kablan Mowad <Kablan.Mowad@penrith.city>
Subject: RE: Penrith Waste Recycling and Transfer Facility - 46-48 Peachtree Road, Penrith

Good morning Abdullah,

I have reviewed the relevant information and request, as forwarded by my colleague Kablan, including the signed Development Consent (which I have re-attached for our mutual reference).

Thank you for reaching out to consult with us on the OTMP development and preparation.

Condition B14 states that the OTMP must "be prepared in consultation with Council".

To that end, we would require the applicant (or yourself on behalf of the applicant) to send us drafts of the OTMP for Council comment, and for our comments to then be implemented in the subsequent draft/s of the OTMP, to Council's satisfaction and concurrence with the finalised OTMP.

Anything less than this would not be considered to be consultation for the purposes of meeting the requirements of Condition B14.

Please feel free to contact me at any time regarding this matter.

I look forward to reviewing the draft OTMP, noting also that it must also address the requirements of Condition B11 (as well as all other requirements of B14 and B15) as it pertains to the operation of the site.

Also please re-include daily truck numbers/ trips and how these will be managed in order to demonstrate satisfaction of Operating Condition B11(c), is it pertains to the operational traffic management of the site and is therefore relevant for inclusion in the OTMP (specifically with respect to satisfying B14[c] "to ensure road safety and network efficiency").

Kind regards,

Daniel Davidson
Senior Traffic Engineer

E Daniel.Davidson@penrith.city
T +612 4732 7735 | F +612 4732 7958
PO Box 60, PENRITH NSW 2751
www.visitpenrith.com.au
www.penrithcity.nsw.gov.au

PENRITH
CITY COUNCIL

Follow us

From: Kablan Mowad <Kablan.Mowad@penrith.city>
Sent: Wednesday, 17 February 2021 3:19 PM
To: Daniel Davidson <Daniel.Davidson@penrith.city>; Graham Green <Graham.Green@penrith.city>; David Drozd <David.Drozd@penrith.city>
Subject: FW: Penrith Waste Recycling and Transfer Facility - 46-48 Peachtree Road, Penrith

Hi All,

Please see the below email for consultation on the preparation of an OTMP for the recycling facility at 46-48 Peachtree Road, Penrith.

Apparently the development has been approved by DPIE and the applicant is wanting to satisfy the consent conditions. I was not involved in the assessment of the application am not aware of any specific concerns for the site but if whoever assessed it is aware of anything that should be specifically raised then please let Abdullah know. If no one has anything to raise then I will let him know that we have nothing to add and the OTMP just needs to address the wording of condition B14 in the attachment.

Regards,

Kablan Mowad
Senior Traffic Engineer

E Kablan.Mowad@penrith.city
T +61 2 4732 8288 | F | M +61 427 609 652
PO Box 60, PENRITH NSW 2751
www.visitpenrith.com.au
www.penrithcity.nsw.gov.au

PENRITH
CITY COUNCIL

Follow us

From: Abdullah Uddin <auddin@emmconsulting.com.au>
Sent: Wednesday, 17 February 2021 2:57 PM
To: Kablan Mowad <Kablan.Mowad@penrith.city>
Cc: Phil Towler <ptowler@emmconsulting.com.au>; Kate Cox <kcox@emmconsulting.com.au>; Eric Lei <elei@emmconsulting.com.au>
Subject: Penrith Waste Recycling and Transfer Facility - 46-48 Peachtree Road, Penrith

---

Good afternoon Kablan

Great to talk to you.

As discussed, the subject development is approved by DPIE and we are now preparing the Operational TMP. Consent condition has asked for consultation with Penrith Council in preparation of this OTMP (see attached condition B14 (b)).

All background information relating this project can be found in the Major Projects website. The TIA is in Appendix D.

I would apricate if you can get back to me by end of next week. Please feel free to call if you have any questions.

Best Regards

Abdullah Uddin
Associate Traffic Engineer
creating opportunities

T 02 9493 9500
M 0425 478 650
E auddin@emmconsulting.com.au
Connect with us

SYDNEY | Ground floor, 20 Chandos Street, St Leonards NSW 2065

APPENDIX G – LANDSCAPE MANAGEMENT PLAN

Planting schedule				
Species	**Common name**	**Maximum height**	**Planting**	**Pot size**
Eucalyptus tereticornis	Forest red gum	30 m	Plant three trees either side of entrance	45 L
Grevillea	Boongala spinebill	2 m	2 m spacing along shed	5 L
Lomondra longifolia	-	1.5 m	Plant at 0.5 m spacing with mulching	Growth tube

EMM

Landscape plan
Penrith Waste Recycling and Transfer Facility
Response to Submissions
Appendix J