ResourceCo RRF Pty Ltd

Operational Environmental Management Plan

Wetherill Park RRF January 2025

1. Document Information

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Definitions

Term	Definition
Accredited laboratory	a testing laboratory accredited by the National Association of Testing Authorities, Australia (NATA) or a similar accreditation authority, or otherwise granted recognition by NATA, either solely or in conjunction with one or more other persons.
Applicant	ResourceCo RRF Pty Ltd
Asbestos	the fibrous form of mineral silicates belonging to the serpentine and amphibole groups of rock-forming minerals, including actinolite, amosite (brown asbestos), anthophyllite, chrysotile (white asbestos), crocidolite (blue asbestos), tremolite, or any mixture containing one or more of the mineral silicates belonging to the serpentine and amphibole groups.
Asbestos-Cement (AC) products	consisting of sand aggregate and cement reinforced with asbestos fibres (e.g., asbestos cement pipes and flat or corrugated asbestos cement sheets).
Asbestos-Containing Material (ACM)	any material, object, product, or debris that contains asbestos.
Asbestos Management Plan (AMP)	a documented approach to promoting a safe and compliant system of work and associated work practices when dealing with asbestos.
BCA	Building Code of Australia
CEMP	Construction Environmental Management Plan
Competent Person	a person possessing adequate qualifications, such as suitable training and sufficient knowledge, experience, and skill, for the safe performance of the specific work.
Construction and Demolition Waste – Inert	Waste arising from commercial or industrial premises, refurbishments and demolition and construction work and includes bricks, concrete, masonry, soil, tiles, gyprock, paper, ferrous and non-ferrous metals, timbers, and organic waste.
Construction and Demolition Waste - Mixed	Waste arising from commercial or industrial premises, refurbishments and demolition and construction work and is free of bricks, concrete, & masonry.
Contaminated Loads Register	a record of the date and registration details of vehicles delivering C&D material that were rejected because asbestos was identified in the load.
Council	Fairfield City Council
DPI	Department of Primary Industries
EfWP	NSW Energy from Waste Policy
EfWMP	Energy from Waste Management Plan
EIS	Environmental Impact Statement titled *Waste and Resource Management Facility* SSD 15-7256, ResourceCo Pty Ltd, 35-37 Franck Street, Wetherill Park, prepared by Nexus Environmental Planning Pty Ltd dated 8 March 2016
EMS	Environmental Management System
EMR	Environmental Management Representative
ENM	Excavated natural material
Environmental aspect	Element of ResourceCo's activities, products or services which can interact with the environment
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2000*
EPA	Environment Protection Authority
EPL	Environment Protection Licence issued by the EPA under the POEO Act
FRNSW	Fire and Rescue NSW

HSEQ Manager	Health Safety Environment Quality Manager
JSEA	Job Safety Environmental Analysis covering both safety and environmental analysis of a task to be undertaken
Incident	A set of circumstances that: • Causes or threatens material harm to the environment and or • Breaches or exceeds the limits or performance measures/criteria
kL	Kilolitres
Load	the quantity of waste material delivered to the stockpile by truck, bin, or trailer
Minister	Minister for Planning (or delegate)
Manufactured Products	Materials that have gone through the production process producing sand, fill, aggregates, and rubbles of various sizes.
Mixed Waste Dry	Commercial quantities of dry waste containing combustible materials free of putrescible waste and suitable for sorting and processing into Processed Engineered Fuel.
NATA	National Association of Testing Authorities
OEH	Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
Operation	The receipt, removal, or processing of waste
PEF	Process Engineered Fuel
Personal Protective Equipment (PPE)	equipment and clothing that is used or worn by an individual person to protect themselves against, or minimise their exposure to, workplace risks. It includes items such as facemasks and respirators, coveralls, goggles, helmets, gloves, and footwear
POEO Act	*Protection of the Environment Operations Act 1997*
PROC	Procedure
Processing	the complete recycling process, including inspection of incoming loads, removal of extraneous material, crushing and blending of different materials to create a recycled product.
QC	Quality control
Raw waste product	Dry mixed waste delivered to ResourceCo for processing
RTS	Response to Submissions titled *Response to Submissions Waste and Resource Management Facility* SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park, prepared by Nexus Environmental Planning Pty Ltd, dated 28 November 2016
SOP	Standard operating procedure
VENM	Virgin Excavated Natural Material, as defined in the POEO Act
Waste	As defined in the POEO Act and includes any materials receive or processed on the site
Waste containing friable asbestos	waste consisting of non-bonded asbestos fabric or waste material that contains more than 1% asbestos by weight and is in the form of powder or can be crumbed, pulverised, or reduced to powder by hand pressure when dry
Waste containing nonfriable asbestos	waste material that contains more than 1% asbestos by weight and in which the asbestos fibres are bonded by cement, vinyl, resin, or other similar materials

2. Introduction

2.1 Overview

ResourceCo RRF Pty Ltd (ResourceCo) is the operator of the Wetherill Park Resource Recovery Facility (the facility) located at 35-37 Frank Street, Wetherill Park. The facility comprises a waste and resource management operation which processes relevant waste materials to recover products including aggregates, metal, timber and to manufacture solid recovered fuel (Processed Engineered Fuel or PEF).

This Operational Environmental Management Plan (OEMP) is one of a suite of plans that governs the operation of the facility.

2.2 Purpose

This OEMP has been developed to address and manage the environmental aspects and potential impacts related to the operation of the facility. The key principles of the OEMP are to provide:

- an environmental management tool for the operation of the facility
- a means of identifying baselines for monitoring the impact of the facility
- an outline of reporting requirements associated with the facility.
- the processes for interaction between ResourceCo and the relevant Government Authorities
- the means by which compliance with the Secretary's requirements and the requirements of the Environmental Protection Licence (EPL) will be achieved.

The OEMP provides an overall framework for environmental management during operation and forms the basis for managing specific environmental aspects such as waste, water, noise, air quality etc.

The OEMP has been developed to satisfy the requirements of:

- Condition C4 of the Development Consent for SSD 7256 dated 10 April 2017
- the commitments made in the Environmental Impact Statement titled ‘Waste and Resource Management Facility’ SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park, prepared by Nexus Environmental Planning Pty Ltd dated 8 March 2016 (EIS)
- the commitments made in the Response to Submissions titled ‘Response to Submissions Waste and Resource Management Facility’ SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park, prepared by Nexus Environmental Planning Pty Ltd, dated 28 November 2016 (RTS)
- ResourceCo’s Environmental Management System (EMS), including ISO14001.
- applicable legislation and regulatory requirements
- requirements of relevant government agencies

In the event of any inconsistency in the above documents, the Development Consent prevails.

2.3 Project description

The Waste and Resource Management Facility Project, as defined in the EIS includes the following key built elements:

- Industrial sheds for housing the facility operations.
- Processing equipment capable of converting up to 250,000 tonnes of relevant waste materials per year into approximately 150,000 tonnes of PEF and over 75,000 tonnes of reusable commodities such as metal, aggregates, and timber.
- Workshop, office, and staff amenities
- Vehicular access and internal roadways, weighbridge and forty-two car parking spaces in two car parking areas
- Stormwater management system for collection of water for reuse in the processing system, and dust suppression or treatment and discharge from the site, including a 300-kL underground stormwater storage tank and two above ground tanks with combined capacity of 27 kL.
- 30 kL diesel fuel tank

2.4 Objectives

ResourceCo is committed to the following objectives:

• To provide a long term, fully licensed Waste and Resource Management Facility capable of recycling mixed Construction and Demolition (C&D) waste and dry Commercial and Industrial (C&I) waste.

• To protect the health and safety of site workers and the general public, and ensure business viability by compliance with relevant legislation, standards and regulating authorities.

• To ensure site operations do not significantly impact on potential environmental receptors and comply with the following environmental legislation:

- the Environmental Planning and Assessment Act 1979, and
- the Protection of the Environment Operations Act 1997.

• To ensure that new technologies are implemented in relation to resource recovery and environmental management of the Waste and Resource Management Facility throughout its life.

• To encourage and facilitate community participation in the recycling of building

and construction waste.

• To protect the surrounding environment through the implementation and management of environmental controls and contingency measures.

• To operate the Waste and Resource Management Facility in a manner which is sympathetic to the amenity of the area in which it is located.

2.5 Environmental management system overview

2.5.1 ResourceCo Health, Safety and Environment Policies

The ResourceCo OH&S Policy and Environment Policy are included in Appendix D and Appendix E.

2.5.2 ResourceCo corporate EMS

This OEMP has been developed and will be implemented in accordance with ResourceCo's corporate EMS. This EMS has been developed, implemented, and certified in accordance with the International Standard for Environmental Management Systems AS/NZS ISO 14001 (Certification No. 2012017).

Throughout the operation of the facility, ResourceCo will undertake periodic reviews and audits of the works to ensure the corporate commitments are fulfilled. ResourceCo's EMS, as implemented at the facility, will be periodically audited as part of the corporate EMS re-certification and ongoing validation process. These audits are detailed in Section 9.

2.5.3 Wetherill Park Resource Recovery Facility OEMP

This OEMP outlines ResourceCo's approach to environmental management through the operation of the facility. The plan is based on the ISO14001 Environmental Management System, which provides for continual improvement in environmental performance.

The OEMP includes a summary of the relevant environmental policies, legislation, regulations, and guidelines relevant to operation of the facility. The plan identifies the key operational activities that are likely to have an environmental impact and develops processes for managing these impacts, via monitoring, inspections, and auditing. Also included in the OEMP is a set of objectives and targets for the environmental performance of the facility during operation. The OEMP documents the management responsibilities of key staff in relation to environmental management.

The OEMP is intended as an over-arching environmental management document that forms the basis for development of detailed sub plans and procedures for managing specific environmental aspects and impacts.

The OEMP includes a number of subordinate environmental planning and management instruments (e.g., sub plans, procedures, instructions, forms etc.) that will be implemented during operation of the facility. The scope and interaction of these documents are described throughout this OEMP and illustrated in Figure 1.

The implementation of the OEMP will involve the execution of key stages listed in Table 1. These stages are designed to ensure continual improvement and allow lessons learnt to be incorporated into the environmental strategies and performance.

Table 1 OEMP stages

Stage	Broad description of each stage
1. Plan	• Identify regulatory and other environmental requirements. • Identify and assess environmental aspects for their potential risks. • Establish and document strategies and procedures to manage those risks. • Consult and/or seek approval from relevant stakeholders. • Establish incident reporting and emergency management procedures
2. Do	• Induct, train, and conduct ongoing awareness programs for employees and

	subcontractors. • Implement management strategies. • Manage community and other stakeholder relations through effective complaints management
3. Check	• Periodic site inspections, incident investigation and auditing, and review of the OEMP and supporting documents. • Implement corrective actions
4. Act	• Continuous improvement through review of processes, risks, and legislative requirements

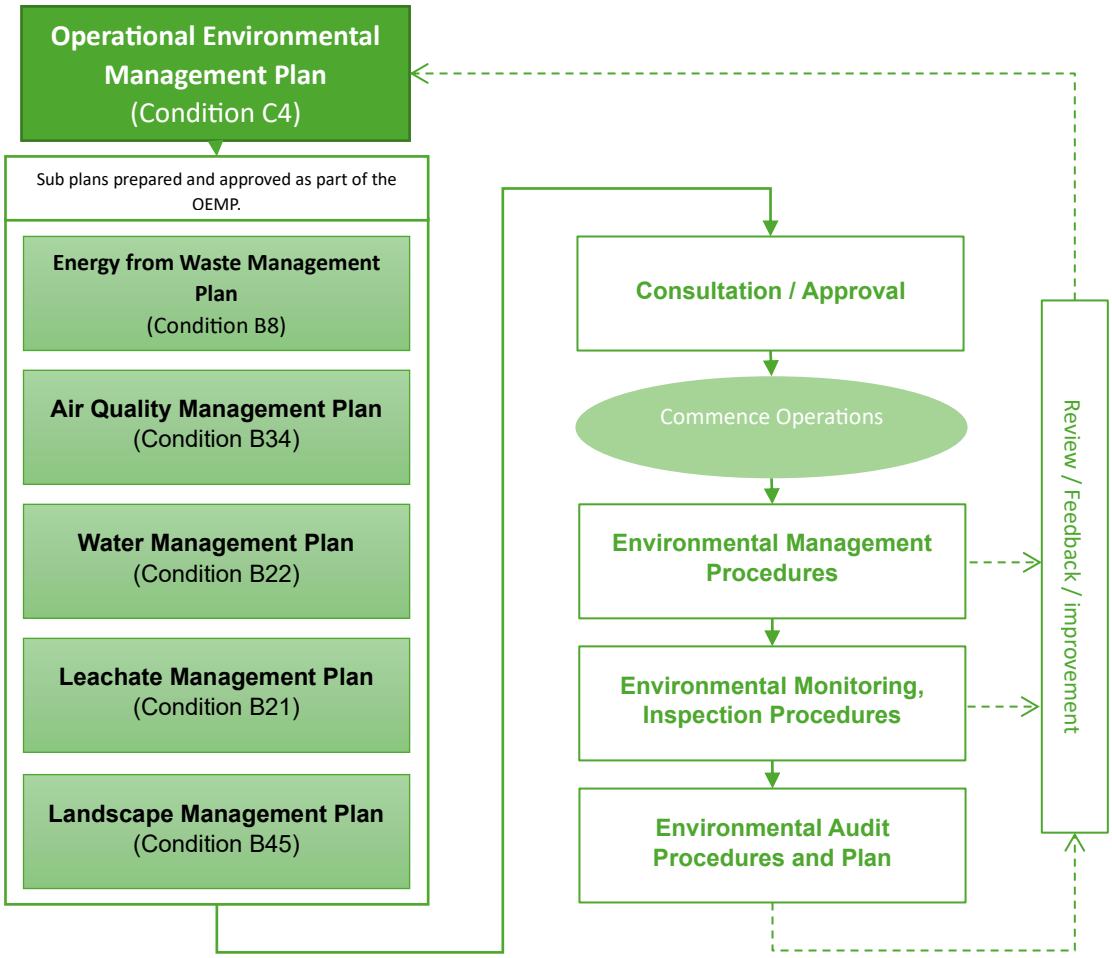

Figure 1 Operational environmental management document structure

2.5.4 Sub plans

In accordance with the Conditions of Approval, a number of sub plans are required to document ResourceCo's management approach to identified risks (e.g. air quality, water and leachate). These sub plans identify potential impacts as they relate to the operation of the facility (as defined in the EIS and RTS) and outline the physical and management safeguards, mitigation measures, responsibilities and monitoring requirements to be implemented to minimise potential impacts on the environment.

The sub plans required according to the Conditions of Approval are shown in Figure 1. Additionally, this shows the sub plans that are to be approved as part of the OEMP and those that are to be approved and/or consulted upon separately.

2.5.5 Procedures and forms

In addition to the environmental management documents nominated above, ResourceCo uses a suite of additional processes and procedures for its EMS. These management tools (described below) are referred to in this OEMP and/or the individual sub plans:

- Procedures (PROC) and Safe Operating Procedures (SOP) – provide instructions to ResourceCo staff and subcontractors to guide the completion of tasks required during the operation of the facility. The implementation of these PROCs and SOPs will ensure consistency in approach and quality of results. Specific procedures are developed for management issues including Job Safety and Environmental Analysis (JSEA) for reviewing works to identify hazards and appropriate control measures, and environmental monitoring etc.
- Environment-related forms (FORM) are used to document environmental issues, actions and/or performance against requirements. Typical forms include incident reporting, inspection checklists, audit protocols, complaints/feedback reports etc.

2.6 Consultation and approval process

2.6.1 OEMP compliance with the Conditions of Approval

Table 2 lists the key requirements of Condition C4 and indicates where these requirements are addressed within this OEMP or other documents.

Table 2 Conditions of Approval requirements

Condition requirements	Response/reference
Condition C4	
The Applicant must prepare and Operational Environmental Management Plan (OEMP) to the satisfaction of the secretary. The OEMP must:	
(a) be submitted to the Secretary for approval prior to the commencement of operation	Section 2.6.2
(b) be prepared by a suitably qualified and experienced expert	The original OEMP prepared by GHD Pty Ltd
(c) provide the strategic framework for environmental management of the development	Section 2.5
(d) identify the statutory approvals that apply to the development	Section 3.2
(e) describe the role, responsibility, authority, and accountability of all key personnel involved in the environmental management of the development	Section 5
(f) 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	Section 8
(ii) receive, handle, respond to, and record complaints	Section 10.9
(iii) resolve any disputes that arise	Section 10.9
(iv) respond to any non-compliance	Section 9.5
(v) respond to emergencies	Section 7.15
(g) include the following environmental management plans:	
(i) Energy from Waste (see Condition B8)	Appendix K
(ii) Air Quality (see Condition B32)	Appendix L
(iii) Water (see Condition B21)	Appendix M
(iv) Leachate (see Condition B20)	Appendix N

2.6.2 Consultation and approval

Table 3 provides a summary of the plans that are required to be prepared prior to operation in accordance with the Conditions of Approval. The table lists the stakeholders to be consulted with and or the approval requirements.

Table 3 Consultation and approval requirements

Condition	Approval document	Consultation	Approval authority
C4	OEMP	-	Secretary of Department of Planning and Environment
B8	Energy from Waste Management Plan	EPA	Secretary of Department of Planning and Environment and EPA
B21	Leachate Management Plan	Fire & Rescue NSW	-
B22	Water Management Plan	DPE	Secretary of Department of Planning and Environment
B34	Air Quality Management Plan	-	Secretary of Department of Planning and Environment
B45	Landscape Management Plan	-	Secretary of Department of Planning and Environment

3. Planning

3.1 Environmental risks (aspects)

3.1.1 Key potential environmental impacts

Table 4 provides a summary of the key potential environmental impacts and corresponding management strategy documentation for each potential impact.

Table 4 Key potential environmental impacts

Potential environmental impact	Management strategy document
Non-compliance with the NSW Energy from Waste Policy	Energy from Waste Management Plan
Impacts to surface water due to non-performance of the leachate management system or from mixing of firewater and leachate and/or stormwater on site	Leachate Management Plan
Impacts to surface water due to non-performance of the stormwater management system or spillage of chemicals/sediment laden stormwater from roadways	Water Management Plan
Air quality (dust) impacts due to ineffective dust or odour controls or work practices	Air Quality Management Plan
Visual amenity impacts due to improper management of onsite revegetation and landscaping	Landscape Management Plan
Traffic and/or access impacts or conflicts due to insufficient operational traffic controls, turning circles or parking provisions	OEMP Section 10.8
Amenity and/or health impacts due to pest, vermin or noxious weed infestations or outbreaks	OEMP Section 10.13
Noise impacts due to ineffective noise mitigation or excessive noise from faulty equipment	OEMP Section 10.5
Dangerous Goods and hazardous materials risk due to inappropriate storage or handling of dangerous goods, resulting in spillage and or potential for pollution or contamination of water, air, or soil	OEMP Section Appendix J

3.1.2 Ongoing identification of environmental risks

The process of identifying environmental risks will be achieved through:

- Review of the key potential environmental impacts as part of the OEMP review to ensure the identified potential impacts remain current.
- For new or non-routine works, or sub-contractor works, environmental risks will be determined though implementation of the JSEA and health and safety procedures. Where necessary, these will identify the need to amend or develop standard procedures.
- Other processes including informal site meetings, site inspections, audits, and toolbox talks.

The ongoing review of environmental risks will consider the following elements:

- Do the identified environmental aspects still pose the risk of environmental impact? Do these need to be reviewed?
- Are there any new environmental aspects that need to be considered?

- Are there any changes to legislative requirements or facility operations which has an impact on the environmental aspects?

3.2 Legislative and other statutory requirements

The following is a summary of the key legislative and statutory requirements that apply or may impact on the operation of the facility:

- Development Application (SSD 7256)
- The EIS and the RTS
- The Development Consent (SSD 7256)
- Key NSW and Commonwealth legislation

If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of the Development Consent shall prevail to the extent of any inconsistency.

In addition, ResourceCo will comply with any reasonable requirement(s) of the Secretary of DPE arising from the DPE's assessment of:

a. any reports, plans strategies, programs or correspondence that are submitted in accordance with the Development Consent; and

b. the implementation of any actions or measures contained within these reports, plans strategies, programs, or correspondence.

A review of the legislative and statutory requirements will be conducted at least once every 12 months in accordance with the requirements of the ResourceCo EMS and/or within 3 months of release of any significant change in environmental regulatory requirements. For changes assessed as having significant impact on the operations, the process of review, development of actions and communication will be undertaken in sufficient time to ensure compliance with the relevant requirements.

The review of legislative and other statutory requirements will consider:

- The currency of legislation and regulations
- The identification of new legislative and regulatory requirements
- The review of non-conformances as a result of legislative non-compliance.

Where required, ResourceCo will seek expert legal advice on legal compliance issues.

3.2.1 Development application

The operation of the facility will be conducted in accordance with the Development Application (SSD 7256).

3.2.2 EIS and RTS

The facility will be operated in accordance with the EIS and the RTS.

3.2.3 Development Consent

The operation of the facility will be conducted in accordance with the Development Consent. This includes:

- the conditions of approval specified in Schedule 2 of the Development Consent
- the management and mitigation measures as identified in Appendix 2 of the Development Consent

- The development layout plans and drawings listed at Appendix 1 of the Development Consent

A copy of the Development Consent is attached in Appendix A.

3.2.4 Management and mitigation measures

The Statement of Commitments described the management measures which ResourceCo has committed to implement with regard to environmental management of the site and the mitigation and monitoring of potential environmental impacts associated with the operation of the facility. A copy of the Statement of Commitments is provided in Appendix 2 of the Development Consent (refer Appendix A). The commitments have been incorporated into the site operation (Section 7) and environmental management (Section 10) sections of this OEMP.

3.2.5 Environment protection licence

The facility has been licensed by the NSW EPA under the POEO Act. The Environment Protection Licence (EPL 20937) will be renewed annually and reviewed every five years from the date of issue. A copy of the EPL is attached in Appendix B. The conditions of the EPL are addressed in this OEMP.

3.2.6 Legislation

The following provides a list of primary environmental legislation applicable to the operation of the facility:

- *Environmental Planning and Assessment Act 1979* (EP&A Act)
- *Protection of the Environment Operations Act 1997* (POEO Act)
- *Environmentally Hazardous Chemicals Act 1985*
- *Protection of the Environment Operations (Noise Control) Regulation 2017*
- *Protection of the Environment Operations (General) Regulation 2022*
- *Protection of the Environment Operations (Clean Air) Regulation 2022*
- *Protection of the Environment Operations (Waste) Regulation 2014*
- *Protection of the Environment Administration Regulation 2012*
- *Heritage Act 1977*
- *National Parks and Wildlife Act 1974*
- *Waste Avoidance and Resource Recovery Act 2001*
- *Waste Recycling and Processing Corporation Act 2010*
- *National Environment Protection Council (New South Wales) Act 1995*
- *Sydney Water Act 1994*
- *Water Management Act 2000*
- *Soil Conservation Act 1938*
- *Public Health Act 2010*
- *Work Health and Safety Act 2011*
- *Road Transport Act 2013*
- *Contaminated Land Management Act 1997*

Furthermore, the *Commonwealth National Greenhouse and Energy Reporting Act, 2007* requires reporting of greenhouse gas emissions and the *Commonwealth National Environment Protection Council Act, 1994* requires reporting of pollutants annually through the National Pollutant Inventory National Environment Protection Measure. This reporting is to the NSW EPA.

3.2.7 Other requirements

In addition to the requirements discussed above, the following publications, standards, guidelines, and codes will be implemented or referenced by ResourceCo during operation of the facility.

Table 5 Publications, standards, guidelines, and codes

Organisation	Document title
Australian Standard	AS 1055 Acoustics – Description and measurement of environmental noise
	AS 1940 - The Storage and Handling of Flammable and Combustible Liquids
	AS/NZS ISO 14001 Environmental Management Systems – Specifications with Guidance for Use
	AS/NZS ISO 8402 Quality Assurance and Quality Management Vocabulary
EPA publications	Waste Classification Guidelines – Part 1: Classification of Waste
	NSW Industrial Noise Policy
	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW 2007
National Association of Testing Authorities (NATA)	NATA Accreditation Requirement Guidelines

4. Site description

4.1 Location and surrounding land uses.

The site location and details are as follows:

- Address: 35 - 37 Frank Street Wetherill Park NSW 2164
- Lot and DP: Lot 1 DP 589097
- Local government area: Fairfield City Council
- Zoning: 4(a) General Industrial Local Government Area
- Site area: 2.077 ha
- Boundaries: Northern Boundary 77.66 m, Western boundary 268.46 m, Southern Boundary 77.38 m, and Eastern boundary 267.49 m.

The site is located within the Wetherill Park Industrial precinct and is well serviced by a major arterial road network. Neighbours include large transport yards, warehousing, and heavy industry.

4.2 Site history and background

Sims Metal purchased the site from Wanless Waste Services in the early 1980s. The site operated as a scrap metal facility with the operational layout unchanged until its closure as a scrap yard in December 2013.

During the Sims Metal operations, the main scrap processing area was in the centre of the site and consisted of a scrap metal shear and associated tower mounted grapple crane surrounded by numerous stockpiles of scrap metal. A concrete sealed ring road ran along the eastern and western boundary as well as cutting through the centre of the site at both the southern and northern end of the shear. The southern (front) section of the site was predominantly covered with concrete slabs.

A large building complex was located adjacent to the southern boundary. This complex comprised a brick front office, metal clad shed, two-storey amenities and office building, an open sided workshop and storeroom and an enclosed warehouse space. Located between this building and the main work area was a weighbridge and associated demountable office and a covered wash bay.

The main stockpile areas to the west and south of the shear were partially sealed and scrap metal was stockpiled on both unsealed and sealed sections. A transformer substation was located on the eastern boundary at the northern end of the road. Stormwater was directed towards the western boundary and into the stormwater retention pond located at the northern boundary.

The stormwater retention pond was setup as a ‘first flush’ system to receive surface water runoff from the entire Site which was passed through an oily water separator prior to discharge to stormwater. The northern (rear) section of the site was unsealed and contained several stockpiles of material (scrap metal and non-metallic refuse). Cutting of heavy gauge scrap using oxyacetylene was undertaken on the north-eastern section of the site. Surface run-off in the northern part of the site was directed towards the stormwater retention pond.

Following its closure as a scrap metal yard the weighbridge and associated demountable office, wash bay building, shear and all stockpiled scrap metal were removed. No new activities have been conducted on the site since its closure as a

scrap metal yard. The physical layout remained the same up until the commencement of remedial works in October 2014.

4.3 Environmental characteristics

The site occupies a rectangular block that slopes gently at the northern end. The site perimeter is marked by variable height retaining walls with 1.8 m high fences installed along the retaining walls.

The properties directly adjacent to the site are sealed with concrete hardstand and warehouses that are used by transport logistics companies.

Directly adjacent to the northern site boundary is a small strip of vegetation and trees located on the grounds of a large logistics complex. The site is located approximately 250 m east of a large concrete-lined canal (formerly a creek line), which trends across Wetherill Park.

The nearest residential receivers are located to the south of the site in Maugham Crescent, Wetherill Park (approximately 840 m away). There are also residences to the east on Hassall Street (1,450 m away), to the south-east (Chifley Street and Galton Street, near Victoria Street) and to the south-west along The Horsley Drive (1,250 m away). The Gipps Road Sporting Complex is located to the north-east with the nearest oval at a distance of approximately 1,150 m. Substantial industrial buildings and infrastructure exist between the facility and all residential and recreational receivers.

4.4 Site layout and facilities

There are two main buildings on the site:

- the manufacturing building; and
- the office/workshop building.

There is open space between these buildings which is dictated by the power line easement – car parking spaces are located on a portion of this open easement space.

Access to the site is from Frank Street and a circular internal road network allows for access and egress of vehicles in a forward manner. A perimeter road exists for access for firefighting purposes.

Two weighbridges with a weigh station office are installed to ensure that all relevant vehicles are registered as entering and exiting the site. Signage is provided to direct incoming vehicles to the appropriate weighbridge.

Appendix F contains a site layout.

4.5 Landscaping

Landscaping for the facility along Frank Street includes a resolute 5 m wide garden bed and a 20 m wide mixed-use zone incorporating landscaped car park and plaza areas comprising feature paving, articulated walls, fences, footpaths, permeable paving, furniture, garden beds and shade trees.

A variable height retaining wall is provided along the western boundary. The western boundary is also planted with screening shrubs and grasses to improve visual amenity. A 1.8 m high fence has been installed along the retaining wall and returns along the northern boundary.

A retaining wall is also provided along the northern boundary. This wall includes a vehicle safety barrier, concrete footpath, and 1.8 m high fence.

4.6 Services

The site is serviced with a potable water, sewer connection and high voltage electricity.

There is an easement for a power transmission line 30.38 m wide and is located in the southern section of the site.

5. Site management structure

The operational ResourceCo RRF structure is defined in this section. The RRF Operations Manager monitors the facilities performance to ensure compliance with all operational, regulatory, and environmental requirements. Assistance is provided to the Operations Manager and site from ResourceCo's corporate centre and specialist consultants.

The organisational structure is shown in Figure 2.

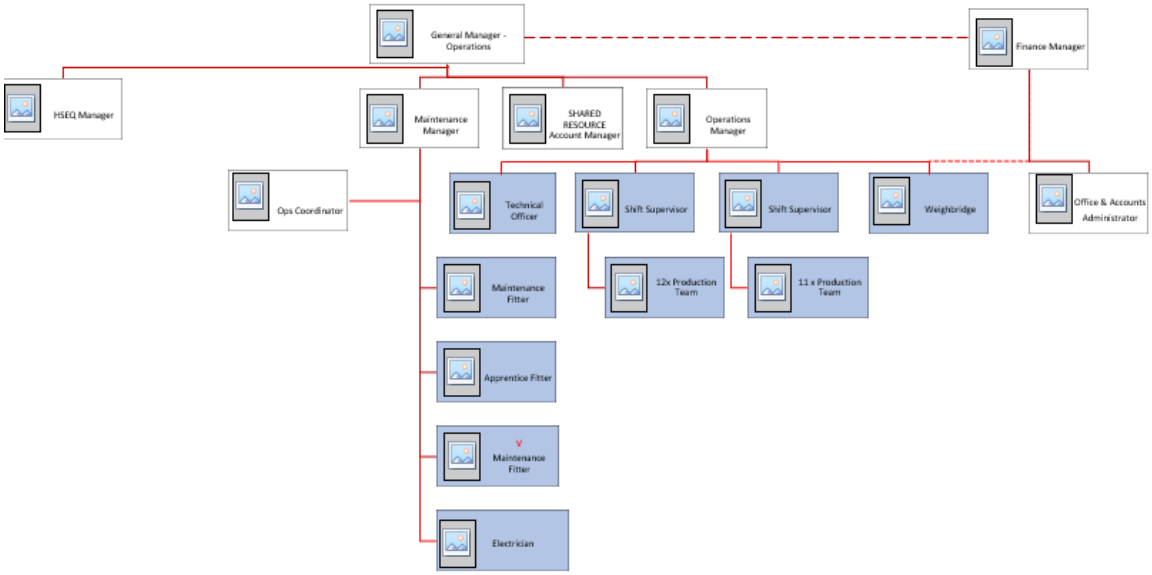

Figure 2 Organisational structure

The following provides a description of each of the RRF key roles:

Operations Manager

- To manage the day-to-day operation of the resource recovery facility, to ensure safe, efficient, and cost-effective operations.

- To produce consistent quality products suitable for customers
- Continual improvement in production processes
- Product and process technical support

Maintenance Manager

- To maintain all plant and equipment safely, efficiently and cost effectively.
- Continual improvement in plant and process performance
- Process, plant, and equipment technical support

Lab technician

- Quality process testing and review, to ensure consistent quality products for customers.
- Continual improvement in production processes process capabilities and efficiencies
- Product and process technical support

HSEQ Manager

- Implementation, administration, and maintenance of WHS system
- To manage environmental compliance

6. Staffing and training requirements

ResourceCo is responsible for providing sufficient and appropriately qualified and trained staff to meet all the requirements described in this OEMP. It is also ResourceCo's responsibility to provide adequate training to all staff performing critical operational tasks such as inspections, waste classification/identification, directing incoming wastes, operation of processing equipment or site vehicles and environmental and health and safety management on site.

ResourceCo has a strong culture of training and developing its employee population and will train personnel to fulfil the requirements in accordance with its Staff Training & Development Policy (Pol 26) and the specific requirements of this OEMP. This training will include, but not be limited to:

- Inductions
- Toolbox sessions
- Environmental awareness
- Emergency response
- Role specific training

All training will be recorded and kept in relevant staff files with licenses and other training initiatives. Employees will be assessed for competency for the position and or role they have been chosen to fulfil.

Third party labour employees will be trained and assessed for competency prior to commencement.

6.1 Inductions

All staff and sub-contractors are to be required to attend induction training and pass a competency test prior to commencing work. The induction covers health, safety, and environmental requirements.

A record of training attendance and induction will be kept on file.

6.2 Toolbox sessions

Toolbox meetings are to be held on a regular basis and cover health, safety, and environmental topics. A schedule of topics will be developed and may be sourced from:

- Hazards register.
- Legislation/regulation changes
- Inspection findings
- Audit finding
- Incidents or near miss investigations
- Suggestions from staff or sub-contractors

The meetings are to be held at a time suitable to allow maximum participation by operational staff and will be used to encourage two-way communication and participation. Attendance will be recorded in the minutes of the meetings.

6.3 Environmental awareness

Environmental awareness training is aimed at increasing environmental awareness and promoting familiarity with environmental issues and aspects. It reinforces and builds on the basic principles covered in the induction and can also be given as refresher training. It covers issues such as:

- ResourceCo EMS and the ISO14000 series of standards
- ResourceCo environmental policy
- Relevant environmental legislation
- JSEA process
- Auditing and workplace inspections
- Incident reporting and investigation
- Environmental issues
- Spills, leaks, contamination management
- Resource management

Environmental awareness training may be delivered through:

- Formal and informal training sessions
- Health and safety meetings
- Online training modules

Attendance at awareness training sessions is to be recorded and kept on file.

6.4 Emergency response

Staff will be trained in environmental controls as part of the emergency response training. Training will cover:

- Identification of various types of emergencies
- Emergency response plans
- Emergency response procedures
- Control of incidents
- Liaising with NSW Fire and Rescue, EPA, SES, police, and other emergency response groups
- Reporting procedures relating to emergency response

Attendance at emergency response training sessions is to be recorded and kept on file.

6.5 Role specific training

In addition to the above, staff will be trained as required to meet their role description and responsibilities for their role. This may include training in record/reporting systems, visual inspections (e.g., to recognise hazardous materials such as asbestos), acceptance criteria, waste handling, quality control etc.

7. Site operations

7.1 Operational conditions

7.1.1 Operating hours

The facility will operate during the following hours (Table 6):

Table 6 Hours of operation

Activity	Day	Time
Earthworks and construction	Monday – Friday Saturday	7am – 6pm 8am – 1pm
Operation	Monday – Sunday	24 Hours

7.1.2 Processes

The facility will process incoming waste through a series of steps including:

- Primary shredding
- Screening and separation
- Secondary shredding
- Baling
- Wrapping

A process flow diagram is provided in Appendix C and an outline of the processes is provided below.

Primary shredding

Waste material will be subject to primary shredding, in which the materials are cut into pieces approximately 300 mm in size.

Screening and separation

The material will then undergo screening and separation through a series of machines including a magnet, vibrating screen, flip flop screen, single drum separator, double drum separator and ballistic separator. This process will generate reusable commodities and two primary fuel (PEF) streams which will be further shredded.

Secondary shredding

One of the PEF streams will comprise separated plastic/high calorific materials which will be further processed through a secondary shredder to cut the material into the final size for baling and wrapping.

The other PEF steam will comprise a higher proportion of wood which will be processed through a hammer mill to cut the material to final size for bulk despatch in covered bulk material trailers.

Baling

The PEF stream for baling will be baled in a horizontal baler. Bales will be tied with a plastic twine.

Wrapping

The baled PEF will then be wrapped in a wrapper which encapsulates the baled PEF in a plastic film to ensure the bales are fully sealed and weatherproof ready for shipping offsite.

7.2 Waste control

7.2.1 Permitted wastes.

The facility is licensed by the NSW EPA to accept general solid waste (non-putrescible) as defined by Schedule 1 Part 3 of the POEO Act. Only wastes expressly permitted by the EPL are to be accepted for processing.

ResourceCo will target the following landfill-destined waste streams:

- C&D recycling residuals from a facility which recycles mixed C&D waste. This waste stream comprises lighter materials leftover once the C&D recycler has extracted metal, aggregates, soil and some timber from waste stream and typically includes plastics, papers, textiles, timber (clean and unclean) and unrecovered C&D materials.
- Mixed C&I Waste from C&I collectors that is free of organics, wet, liquid, hazardous or radioactive wastes.
- Mixed C&D wastes from C&D collectors that is free of organics, wet, liquid, hazardous or radioactive wastes

7.2.2 Excluded wastes.

Specific waste types not permitted to be accepted into the facility include the following:

- Liquid wastes (paint, chemicals, oils, solvents etc)
- Listed wastes.
- Household or kerbside collected green and general waste.
- Explosives
- Poisons
- Radioactive materials
- Medical waste (syringes, clinical and related waste)
- Asbestos
- Scheduled pharmaceuticals.
- Contaminated soils

In addition, in accordance with Condition B5, any waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by the EPL.

7.2.3 Waste screening and acceptance

Pre-qualification

All potential customers will be required to be pre-qualified before being allowed to bring waste to the facility in accordance with PROC28 *Incoming Waste Customer Pre-Qualification Procedure* (Appendix G). This pre-qualification process will determine if the potential customer's waste meets the approved acceptance criteria for the site, if it will enable high quality products including PEF to be produced and which category it meets for the PEF processing criteria, which are:

- C&D recycling residues
- mixed C&I "no limit PEF"
- mixed C&I "50% PEF" or
- mixed C&D

If the customer's pre-qualification meets the C&D recycling residues category the customer will be required to complete a declaration stating that their residuals being sent to ResourceCo is no more than 25% of their incoming waste by weight and that ResourceCo is the only energy recovery facility to which they are sending their residuals. This declaration will be required to be completed on a quarterly basis to allow ResourceCo to submit this declaration with its quarterly allowable PEF percentage calculation to the NSW EPA.

At the facility

Signs at the entrance clearly indicate the types of wastes that are and are not accepted at the facility.

When a vehicle enters the weighbridge, the Customer Service and Weighbridge Operator will check with the driver if the waste meets the acceptance criteria, and will visually inspect the load for waste types not accepted or to be excluded from the production process (as outlined Section 7.2.2). If part or all of the load is identified as not be approved for tipping in the facility the truck will not be unloaded and will be directed to leave the site immediately. The Customer Service and Weighbridge Operator will also ensure that all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site.

If the waste meets the acceptance criteria, then the waste delivery truck will be directed to the waste tipping area inside the manufacturing building. Once the load is tipped the Waste Receival Inspection Officer will inspect the load for waste types not accepted or to be excluded from the production process, and to ensure that all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site.

Wastes that are not able to be accepted will either be sent back out of the site on the same waste delivery truck (if it is able to be) or removed from site as soon as possible by a licenced collector at the customers expense (if the incoming waste truck has left the site or if it is not able to be reloaded). Appendix H provides a job description for this person's role. Section 7.3.1 outlines the approach to handling and disposal of hazardous materials such as asbestos, sharps and chemical/biological materials that, despite the waste acceptance procedures, have been delivered to site.

7.2.4 Waste monitoring program

Incoming waste

The following details will be recorded and kept on file for all incoming waste received on the site:

- Quantity, type, and source of waste
- Date and time of receival
- PEF processing criteria category
- Copies of all documentation relating to tracking for controlled waste brought to the site.
- Details of any hazardous or other prohibited materials (including asbestos) brought to the site, along with handling and disposal activities undertaken and a record of any related documentation.

Outgoing material

The following details will be recorded and kept on file for all material produced on site and disposed of site:

- Quantity, type, quality, and destination of outputs/products
- Quantity, type, and destination of all waste/residuals sent for offsite disposal.
- Copies of all documentation relating to tracking for all controlled waste leaving the site

Training

Staff will receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos. Training will be in accordance with Section 6.

7.3 Quality control

7.3.1 Hazardous materials

Any materials listed in Section 7.2.2 will be immediately rejected from the site where safe to do so and staff will be trained to ensure that these materials are first quickly identified and secondly safely removed from the waste stream. Specific management techniques for key hazardous waste types are provided below.

Asbestos

The following will be implemented to manage the potential for asbestos in the waste stream:

- Direct education with the customer base to ensure that only materials that are asbestos free will be accepted at the site. This is particularly focussed upon in the pre-qualification process (refer Section 7.2.3) with a potential new customer.
- Well positioned, appropriate signage at the entrance, weighbridge on weight dockets and at the drop off point.
- Asbestos identification training for all relevant staff on site. Please see Appendix I for the Asbestos Management Plan
- Safe asbestos management and removal training for all relevant staff on site.

Safe asbestos management and removal procedures are outlined in the Asbestos Management Plan (Appendix I).

Sharps and medical waste

Sharps and medical waste identification training for all relevant staff on site. Please see Appendix J for PROC 205 *Hazardous Materials Response Management plan (including Dangerous Goods and Sharps)*.

Chemicals and oils

Hazardous Chemicals identification training for all relevant staff on site. Please see Appendix J for PROC 205 *Hazardous Materials Response Management plan (including Dangerous Goods and Sharps).*

Oil spill kits will be kept on site at all times and staff will be trained in its appropriate use.

Chemicals will be managed on an as needs basis with supervisors with dangerous goods training quickly assessing if the spill can be safely managed internally of if external assistance is required i.e., NSW Fire and Rescue.

7.3.2 PEF

The process flow diagram for the facility is attached in Appendix C.

Quality control will be undertaken in accordance with the procedures for PEF quality management outlined in the Energy from Waste Management Plan (Appendix K). This includes:

- Control of the wastes accepted into the facility, as described in Section 7.2.3, to minimise contaminants, and in particular PVC plastics through:
  - Pre-qualification of customers
  - Waste screening and acceptance processes including visual inspection.
- Development of PEF specifications and test procedures in conjunction with customers
- Physical separation of the incoming waste stream to remove materials from the PEF product.
- Physical testing in accordance with test procedures
- Online PEF analyser for the higher wood content PEF output line to monitor chlorine content, calorific value, and moisture.

PEF specification and test procedures will be determined in conjunction with each specific customer (typically cement kilns). The required specification and test procedures for PEF and procedures for management of out of specification PEF are provided in Appendix K.

7.4 Waste delivery

All waste delivered to site will be weighed in at the weighbridge and the following information recorded:

- Vehicle registration
- Customer name and address

- On accessing the site, Gross Weight, on egressing the site Tare Weight, ascertaining the Net Weight
- Categorisation of the waste materials (either C&D recycling residues, C&I “no limit PEF,” C&I “50% PEF” or mixed C&D)

The driver will be directed to the receival hall to deposit the waste. The Waste Receival Inspection Officer will then perform a visual inspection of the waste. Once a visual inspection of the waste has been undertaken and the material is deemed suitable as meeting acceptance criteria (refer Section 7.2.3), the waste will be moved into the waste receival stock. Vehicles will exit via second weigh bridge, and at this point the transaction will be completed and additional charges and/or information recorded (if applicable) will be applied.

All vehicular travel will be on well sign posted and sealed roads.

7.5 Waste storage and processing

All processed and unprocessed waste will be stored within the building on the site.

Waste will be secured and maintained within designated waste storage areas at all times and is not to leave the site onto neighbouring public or private properties.

Processed, wrapped, and baled PEF may store in the area designated on the approved plans for the outdoor storage of PEF, as described in Section 7.6.

7.6 Finished PEF storage and despatch.

Finished PEF will be stored in the finished PEF storage area. This area is able to store approximately 1,800 tonnes and will be operated within the following parameters:

- Minimise PEF to be stored on site at any one time (target = less than 1 day’s production) to maximise the buffer storage space available in the event of a despatch issue.

Should despatch to suppliers be interrupted, then all PEF production will be diverted to the baling and wrapping line, after which it will be containerised and exported so as not to interrupt PEF production. The supply chain is sufficiently long and buffered such that it is not anticipated to create any despatch issues at the facility. However, should there be a significant despatch interruption, the following procedure will be enacted:

1. Maximise the storage of PEF in the PEF storage area (this includes both the loose PEF stored with the PEF storage area of the building as well as the baled and wrapped PEF storage area of the site)
2. Once the PEF storage area is full, cease manufacturing PEF until the undercover waste infeed area (which has a capacity of approximately 2,000 tonnes) is full.
3. Once both these areas are full, cease receiving waste at the facility. The waste type (general solid waste (non-putrescible)) is able to be disposed of at one of a number of landfills in western Sydney.

7.7 Site supervision and control

The facility and site will be supervised by suitably experienced and qualified staff at all times during operational hours.

7.8 Equipment

Sufficient and appropriate plant, equipment and machinery will be provided and maintained to meet the requirements of this OEMP. This will include, but is not limited to, equipment for:

- Dust suppression
- Fire control and firefighting
- Waste inspection
- Waste handling and testing
- Environmental monitoring
- Any other operation/task/activity required for the proper and efficient operation of the facility.

All equipment will conform to relevant Australian Standards, where applicable.

All plant, machinery and equipment will be maintained in proper working order in accordance with manufacturers' requirements. In the event of any plant, machinery or equipment failure, repairs and/or a replacement will be organised as soon as practicable to ensure that the requirements of the OEMP can be complied with at all times.

7.9 Plant and Equipment Maintenance

All plant and equipment installed or used within the CRRRF Facility will be operated and maintained in accordance with the Consent Conditions and EPL requirements. This includes all processing infrastructure and pollution control equipment. ResourceCo Maintenance of Plant and equipment as an appendix U.

7.10 Security

The site is fenced and outside of operating hours, all access gates will be locked. Public access to the site will only be permitted during opening hours and with prior approval. In addition, manned security will patrol the site at all times the site is not operating.

7.11 Health and safety

ResourceCo considers the occupational health and safety of its employees to be of primary importance. ResourceCo aims to provide a safe work environment for all staff, contractors, and visitors.

The site will be operated in accordance with OHSAS 18001 Occupational Health and Safety Management System and ISO 14001 Environmental Management System.

7.12 Wet weather operation

The facility will operate under all weather conditions.

7.13 Fire control

Fire prevention will include:

- Onsite fire water tank and pumping equipment for firefighting.
- Fire protection system (deluge) in the building
- Specific fire protection systems for major equipment
- Installation of portable fire extinguishers in suitable locations across the site
- Smoking in designated area only.
- All fuels or flammable liquids for operational use will be stored in appropriately bunded, ventilated, and secure stores.
- Hot works permits will be used where appropriate.
- 24-hour site coverage by fire trained people (either staff or security personnel when the site is not staffed)

Fire management at the site will be undertaken in accordance with Emergency plan - Pollution incident response management plan Wetherill Park ResourceCo RRF 27.05.2022 (Appendix P).

All fire events will be recorded and investigated as per PROC 12 *Incident Reporting and Investigation* (Appendix R), and appropriate actions from the investigation implemented.

Staff will be trained in the use of first attack firefighting as well as fire prevention, protection and emergency response procedures. Refresher training will be provided on a regular basis.

7.14 Vehicle wheel washing

ResourceCo will ensure that all trucks leaving the site will depart via a wheel wash facility.

7.15 Incident investigation

Incident investigation will be in accordance with PROC 12 *Incident Reporting and Investigation* (Appendix R).

7.16 Emergency response

Emergency management will be undertaken in accordance with Emergency plan - Pollution incident response management plan Wetherill Park ResourceCo RRF 27.05.2022.

8. Records and reporting

8.1 Reporting

8.1.1 Waste reporting

The weighbridge data including type, PEF category and amount of waste (in tonnes) received at the site on a daily basis will be recorded and retained.

All waste tracking, sampling and waste classification data will be retained on site for the life of the facility and be kept readily available for inspection by the EPA and the Secretary of the Department of Planning and Environment.

8.1.2 Outgoing material

The type, quantity and destination of all material produced on site and transported off-site as product or waste will be recorded and retained.

All waste tracking, product testing and waste disposal data will be retained on site for the life of the facility and be kept readily available for inspection by the EPA and the Secretary of the Department of Planning and Environment.

8.1.3 Incident reporting

The Secretary of the Department of Environment and Planning and any other relevant agencies will be notified of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the facility immediately after it becomes aware of the incident.

Within seven days of the date of this incident, the Secretary of the Department of Environment and Planning and any relevant agencies will be provided with a written notification of the incident.

Incident investigation and reporting will be in accordance with PROC 12 *Incident Reporting and Investigation*.

8.1.4 Regular reporting

Regular reporting on the environmental performance of the facility will be provided on the ResourceCo website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of consent.

The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded.

8.2 Record control

Environmental management records generated will be identified, collected and stored in accordance with ResourceCo's quality management system.

All records required to be kept by this licence must be:
a) in a legible form, or in a form that can readily be reduced to a legible form;
b) kept for at least 4 years after the monitoring or event to which they relate took place;

and
c) produced in a legible form to any authorised officer of the EPA who asks to see them

9. Environmental auditing and review

9.1 Annual

ResourceCo will review the environmental performance of the facility on an annual basis to the satisfaction of the Secretary of the Department of Planning and Environment. The review will:

a. describe the development that was conducted in the previous calendar year, and the development that is proposed to be carried out over the next year.

b. include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against the:

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

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

   (iii) the monitoring results of previous years, and

   (iv) the relevant predictions in the EIS

c. identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance.

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.

9.2 Management system audits

9.2.1 ResourceCo EMS audit

The ResourceCo Environment Manager or delegate will carry out a corporate audit annually, which covers environmental risk and compliance. The audit will include interviews with site personnel. Planning for the audit will include familiarisation with relevant site practices, site-specific issues and the OEMP, prior to conducting the audit.

9.2.2 ISO 14001 re-certification audits

ISO 14001 re-certification audits will be undertaken periodically as part of ResourceCo's corporate ISO 14001 EMS re-certification and ongoing validation audit process.

9.3 Independent environmental audit

An independent environmental audit of the project will be undertaken within six months of commencement of operations of the facility and every three years thereafter (unless the Secretary of the Department of Planning and Environment directs otherwise). The audit must:

a. be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary.

b. include 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 other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);

d. review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and

e. recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these consents.

The audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary of the Department of Planning and Environment.

Within two months of commissioning this audit, or as otherwise agreed by the Secretary of the Department of Planning and Environment, ResourceCo will submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

9.4 OEMP review and improvement.

The OEMP will be reviewed on a regular basis to ensure that it accurately reflects the ResourceCo EMS, conforms to applicable legislative and other requirements, and continues to be a practical tool for environmental management. The OEMP and sub plans will be reviewed when either of the following triggers occur:

- As a minimum, annually in accordance with ResourceCo EMS requirements, or
- If a required corrective and/or preventative action in response to an environmental incident or the outcomes of an environmental audit
- If requested by the Department of Planning and Environment or other authority.

At the conclusion of the OEMP review process, any recommendations for change, or improvement, to EMS will be reflected through amendments to the relevant system element including the OEMP, sub plans, procedures, or forms.

An assessment will be undertaken of the proposed documentation change against the Conditions of Approval (including development consent, EIS and RTS).

Minor changes to the OEMP, or support documents, will be recommended by the appropriate manager. The revised documents will be managed in accordance with ResourceCo's quality management system – including document control and communication of changes to relevant staff.

Major documentation changes to the OEMP will be reviewed by senior management, and if deemed necessary, approval will be sought from the Department of Planning and Environment. Approved revised documents will be managed in accordance with ResourceCo's quality management system – including document control and communication of changes to relevant staff.

Table 7 lists the types of amendments that would be considered minor and major, and the approval process.

Table 7 OEMP approval process

Review trigger	Amendment type	DPE approval	Examples
Minor amendments and corrections	-	No	Changes to system processes without change to environmental outcome. Minor changes to operational processes without change to environmental outcomes
In response to environmental incidents	Minor	No	Noise complaint
	Major	Yes	Non-compliance with EPL
Audit findings	Minor	No	Change to procedure to improve a process
	Major	Yes	Non-compliance with a Condition of Approval
Request by government agency	Minor or major	Yes	-
Annual review findings	Minor	No	Non-compliance with a target
	Major	Yes	Non-compliance with a Condition of Approval

9.5 Non-conformance, corrective, and preventative action

Non-conformances, including those of an environmental nature, shall be identified through verification processes such as monitoring, inspections, audits, and reviews as well as through the receipt of complaints and incidents and near misses. All ResourceCo personnel can raise a non-conformance. In summary, the management process is:

- When a non-conformance issue is detected, the corrective and preventative actions are entered on a CAR (Corrective Action Request) form (Form 1). In addition, the CAR assigns responsibilities for actions to a manager for close-out and the timing for completion.
- The CAR is entered into the CAR register for recording and tracking progress of follow-up and close-out.
- Upon satisfactory completion of all corrective actions and follow-on preventative actions (e.g., revision of documented procedures), the CAR is closed-out by the responsible staff member.
- The environmental CARs will be reviewed monthly and during the regular review meetings.
- During the annual environmental review, CAR statistics will be assessed, and trends analysed.

10. Environmental management

10.1 Energy from waste management

10.1.1 Environmental goals and principles

Energy from waste management aims to:

- Ensure the facility operates in accordance with the requirements of the *NSW Energy from Waste Policy Statement* Resource Recovery Criteria

10.1.2 Management strategy

The approach to energy from waste management will be to:

- Pre-qualify customers in accordance with the Incoming Waste Customer Pre-Qualification Procedure
- Demonstrate compliance with *Energy from Waste Policy Statement* Resource Recovery Criteria in accordance with the Energy from Waste Management Plan (Appendix K)

10.1.3 Activities/frequency

- Calculation PEF production target and demonstration of compliance with the *Energy from Waste Policy Statement* Resource Recovery Criteria – three monthly

10.1.4 Performance indicators/targets

The performance indicators/targets are:

- Compliance with the *Energy from Waste Policy Statement* Resource Recovery Criteria

10.1.5 Reporting and review

- Annual review of compliance with the *Energy from Waste Policy Statement* as part of the environmental review
- A record of all calculations and supporting documentation will be kept on file.

10.2 Erosion and sediment control

10.2.1 Environmental goals and principles

Erosion and sediment control aims to:

- Prevent soil erosion.
- Minimise generation of sediment and prevent sediment laden runoff from discharge off site.
- Prevent surface water contamination by sediment.

10.2.2 Management strategy

The approach to erosion and sediment control will be to:

- The site will be fully sealed.
- Install and maintain erosion and sediment controls as per the Water Management Plan (Appendix M).
- Inspect drainage and sediment controls monthly and conduct maintenance as required to ensure effectiveness. Where erosion is observed to be occurring, implement rehabilitation/stabilisation measures.

10.2.3 Activities/frequency

- Inspections of all drainage and sediment controls on site, including water storage, pumps and pipes, silt fences – monthly
- Water quality monitoring – as per EPL and/or Water Management Plan
- Review of monitoring results – monthly

10.2.4 Performance indicators/targets

The performance indicators/targets are:

- No exceedances of EPL conditions for water quality

10.2.5 Reporting and review

- Summary of water quality monitoring results to the EPA as part of Annual Return for EPL.
- Exceedances of EPL conditions will be reported at toolbox or site meetings.
- A record of all inspections will be kept on file.

10.3 Stormwater management

10.3.1 Environmental goals and principles

Stormwater management aims to:

- Prevent surface water contamination by site runoff.
- Minimise impacts to downstream flow conditions.
- Prevent flooding of the site

10.3.2 Management strategy

The approach to the management of stormwater on the site will be to:

- Install and maintain water management structures to contain and treat all rainfall and runoff as per the Water Management Plan (Appendix M).
- Minimise the area of disturbance.
- Install a tank farm to store stormwater collected on the site for re-use in dust mitigation.

10.3.3 Activities/frequency

- Inspections of all water management structures on site – monthly
- Water quality monitoring – as per EPL and/or Water Management Plan
- Review of monitoring results – monthly

10.3.4 Performance indicators/targets

The performance indicators/targets are:

- No exceedances of EPL conditions for water quality

10.3.5 Reporting and review

- Summary of water quality monitoring results to the EPA as part of Annual Return for EPL.
- Exceedances of EPL conditions will be reported at toolbox or site meetings.
- A record of all inspections will be kept on file.

10.4 Leachate management

10.4.1 Environmental goals and principles

Leachate management aims to:

- Prevent groundwater pollution by leachate.
- Prevent surface water pollution by leachate.
- Prevent amenity impacts to nearby waterways.

10.4.2 Management strategy

- Operate in accordance with the Leachate Management Plan (Appendix N)
- Ensure all waste is received and delivered inside the building. No waste will be stored outside.
- Ensure dry sumps within the building are emptied and leachates removed from the site to an appropriately licenced disposal facility.

10.4.3 Activities/frequency

- Review of leachate disposal quantities – yearly
- Water quality monitoring – as per EPL and/or Leachate Management Plan (Appendix N)

10.4.4 Performance indicators/targets

The performance indicators/targets are:

- All collected leachate is removed to an appropriately licenced disposal facility.
- No exceedances of EPL conditions for water quality

10.4.5 Reporting and review

- Summary of water quality monitoring results to the EPA as part of Annual Return for EPL.
- Exceedances of EPL conditions will be reported at toolbox or site meetings.
- Leachate disposal quantities reported as part of annual environmental review.

10.5 Noise management

10.5.1 Environmental goals and principles

Noise management aims to:

- Prevent noise pollution offsite.

- Prevent amenity impacts from noise.
- To ensure operation noise complies with the conditions of approval and EPL requirements.

10.5.2 Management strategy

The approach to the management of noise on site will be to:

- All processing machinery is located within the manufacturing buildings, except where noted.
- Keep manufacturing building roller doors closed, except when access or egress from the building is required.
- Ensure all mobile plant used is fitted with silencers.
- Plant based at the site will be fitted with "quacker" style reversing alarms.
- Ensure all machinery, plant and equipment is maintained in proper working order in accordance with the manufacturer's requirements.
- Maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired
- Assess noise emissions and implement actions to ensure compliance with the relevant conditions of the Development Consent

10.5.3 Activities/frequency

- Maintenance of machinery, plant and equipment – as required
- Recording of noise complaints – on occurrence
- Noise monitoring:
  - Once the site is fully operational to gain an appreciation of noise levels and confirm source level estimations in the EIS
  - As required by the EPL
  - Based on receipt of a valid noise complaint
  - If any significant changes are made onsite which increases noise levels

10.5.4 Performance indicators/targets

The performance indicators/targets are:

- No exceedance of the noise limits in Table 8
- No noise complaints

Table 8 Noise limits dB(A) – Condition B26

Location	Day $L_{Aeq(15\ minute)}$	Evening $L_{Aeq(15\ minute)}$	Night $L_{Aeq(15\ minute)}$	Night $L_{A1(1\ minute)}$
All residential receivers	35	35	35	45

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.

10.5.5 Reporting and review

- Annual reporting as part of EPL requirements
- Exceedances of EPL or Development Consent noise limits will be reported at toolbox or site meetings.
- A record of all inspections will be kept on file.
- Maintenance records will be kept on file.

10.6 Air quality management

10.6.1 Environmental goals and principles

Air quality management aims to:

- Prevent air pollution.
- Prevent amenity impacts from odour and dust.

10.6.2 Management strategy

The approach to air quality management will be to operate in accordance with the Air Quality Management Plan (Appendix L):

- Minimise the areas of disturbance.
- Maintain dust suppression and extraction equipment at major dust generation points in the process.
- Maintain the dust suppression sprays at key process locations, including conveyors of the processing plant and stockpile sprinklers
- Keep manufacturing building roller doors closed, except when access or egress from the building is required.
- Use industrial sweeper to clean roadways and operational areas on a regular basis
- Enforce a 10 km/h speed limit on internal roads to minimise dust generation
- Ensure all loaded vehicles entering and leaving the site are covered.
- Undertake regular maintenance of mobile and fixed equipment to minimise exhaust emissions.

10.6.3 Activities/frequency

- Dust suppression and extraction – as required.
- Cleaning/sweeping of roadways – as required.
- Regular maintenance of equipment – as per manufacturer's requirements
- Dust observations – as per the Air Quality Management Plan (Appendix L)

10.6.4 Performance indicators/targets

The performance indicators/targets are:

- No air quality complaints

10.6.5 Reporting and review

- Any air quality issues will be reported at toolbox or site meetings.
- Complaints will be reported at toolbox or site meetings.
- A record of all inspections will be kept on file.
- Maintenance records will be kept on file.

10.7 Waste management

10.7.1 Environmental goals and principles

Waste management aims to:

- Minimise waste generated, maximise reuse and recycling.
- Ensure all wastes are managed effectively to minimise potential impacts on the environment.

10.7.2 Management strategy

The approach to the management of waste on the site will be to:

- Provide separate receptacles for recyclables.
- Dispose of non-recyclable waste at an appropriately licenced landfill
- Encourage staff to adopt waste-reducing practices.

10.7.3 Activities/frequency

- Inspection of onsite sorting and storage of recyclables – monthly

10.7.4 Performance indicators/targets

The performance indicators/targets are:

- All waste is recycled or disposed to a licensed facility.

10.7.5 Reporting and review

- Any waste management issues will be reported at toolbox or site meetings.
- A record of all inspections will be kept on file.

10.8 Traffic and access management

10.8.1 Environmental goals and principles

Traffic and access management aims to:

- Minimise disruption to the local traffic network.
- Ensure there is no queuing on public roads.
- Ensure internal road safety.

10.8.2 Management strategy

The approach to traffic and access management will be to:

- Provide all new truck drivers with ‘Site Induction for Drivers’ form at the site entrance.
- Provide drivers with the Site Traffic Management Policy
- Ensure all loads are fully covered prior to leaving the site.
- Enforce a 10 km/h speed limit on internal roadways.
- Ensure all vehicles enter and leave the site in a forward direction.
- Provide signage at each crossing to state the proposed use i.e. staff and visitor access only and truck and car/trailer/emergency appliance access with pavement arrows or signage to show entry and exit crossing
- Ensure all vehicles delivering waste materials will enter from the western crossing travel over the weighbridge and unload at the northern raw feed stockpile and travel in a clockwise direction to the weighbridge and exit crossing
- Ensure heavy vehicles used to transport processed PEF for export and local users will enter from the western crossing, travel over the weighbridge, load and travel to the weighbridge and then to the exit

10.8.3 Activities/frequency

- Inspection of all loads at the site entrance to make sure they are covered – on occurrence.
- Record any traffic management complaints in the Complaints Register – on occurrence.
- Inspection of the site entrance for waste accumulation – weekly
- Inspection of road pavements for damage conditions – monthly

10.8.4 Performance indicators/targets

The performance indicators/targets are:

- No traffic incidents
- No traffic management complaints

10.8.5 Reporting and review

- Any traffic issues will be reported at toolbox or site meetings.
- Complaints will be reported at toolbox or site meetings.
- A record of all inspections will be kept on file.

10.9 Complaints handling, investigation and rectification and dispute management.

10.9.1 Environmental goals and principles

Complaints and dispute management aims to:

- Ensure any site problems brought to the attention of ResourceCo by the local community and/or relevant authorities are documented and acted upon to avoid re-occurrence.

10.9.2 Management strategy

The approach to complaints and dispute management will be, in accordance with PROC 9.1 *Environmental Complaints Procedure - NSW*, and:

- A complaints telephone number will be signposted at front gate. The telephone number, along with postal and email address for complaints will be advertised on the ResourceCo website.
- All complaints/concerns raised by local community/relevant authorities will be recorded on the Complaints Register. The Complaints Register (REG 10) will be retained on site.
- All complaints will be bought to the attention of the Environmental Officer immediately.
- The Environmental Officer will identify and initiate appropriate action in response to complaint and follow-up contact with complainant.
- Any complaints received will be reviewed to ascertain if site management requires amendment.
- Disputes will be escalated in accordance with PROC 9.1 *Environmental Complaints Procedure – NSW* (Appendix Q).

10.9.3 Activities/frequency

- Record all complaints in the Complaints Register – on occurrence.
- Check Complaints Register - monthly.

10.9.4 Performance indicators/targets

The performance indicators/targets are:

- No complaints

10.9.5 Reporting and review

- Summary of complaints to the EPA as part of Annual Return for EPL
- Complaints will be reported at toolbox or site meetings.

10.10 Hazard management

10.10.1 Environmental goals and principles

Hazard management aims to:

- Ensure any potential hazards are identified, assessed and controlled.

10.10.2 Management strategy

The approach to hazard management will be to:

- Ensure all staff are inducted and receive ongoing training via toolbox talks regarding their responsibilities relating to handling, storage and disposal of dangerous goods, hazardous chemicals and spill training
- Ensure all hazardous chemicals are stored in accordance with AS 1940 guidelines – including covering, bunding, barriers, signage, etc where appropriate

- Maintain Safety Data Sheets (SDS) for each hazardous chemical that is kept on site at the storage facilities
- Provide spill kits in strategic locations across the site.
- Ensure any spills are cleaned up immediately using spill kits and disposing of contaminated material at an appropriately licenced waste facility.
- Ensure staff are trained in spill clean-up procedures and use of the spill kits at the site
- Installation of portable fire extinguishers in suitable locations across the site
- Ensure staff are trained in the use of first attack firefighting.
- Develop and implement a procedure for the refuelling of mobile plant.

10.10.3 Activities/frequency

- Record all incidents including measures taken to mitigation impacts – on occurrence
- Check spill kits and firefighting equipment – 3 monthly.
- Safety inductions for all staff on commencement and refreshers on a regular basis – ongoing

10.10.4 Performance indicators/targets

The performance indicators/targets are:

- Response to incidents in accordance with Section 7.15
- All staff trained in spill clean-up procedures, use of spill kits and first attack firefighting.

10.10.5 Reporting and review

- Summary of incidents to the EPA as part of Annual Return for EPL
- Hazards will be reported at toolbox or site meetings.
- A record of all inspections will be kept on file.
- Incident reporting will be in accordance with PROC 12 *Incident Reporting and Investigation*

10.11 Landscape management

10.11.1 Environmental goals and principles

Landscape management aims to:

- Maintain areas of permanent landscaping to minimise the potential for environmental or amenity impacts.
- Prevent the propagation of weeds.
- Maintain site visual appeal.

10.11.2 Management strategy

The approach to landscape management will be to:

- Install and maintain the landscaping of the site in accordance with the Landscape Management Plan (Appendix O)
- Maintain the site in a tidy manner and ensure the site is regularly cleaned and maintained
- Undertake weed management in accordance with the Landscape Management Plan (Appendix O)

10.11.3 Activities/frequency

- Landscape watering and maintenance – as required.
- Periodic checks of landscaping areas to assess degree of weed infestation, health of planted trees and the presence of appropriate erosion and sedimentation controls – 6 monthly
- Weed control – yearly as a minimum.

10.11.4 Performance indicators/targets

The performance indicators/targets are:

- Landscaping and vegetation maintained in accordance with the Landscape Management Plan (Appendix O)
- No weeds on site

10.11.5 Reporting and review

- Any landscape management issues will be reported at toolbox or site meetings.
- A record of all inspections, weed control and maintenance activities will be kept on file.

10.12 Litter control

10.12.1 Environmental goals and principles

Litter management aims to:

- Prevent spread of litter off site to the environment.
- Prevent amenity impacts from litter.
- Maintain site visual appeal.

10.12.2 Management strategy

The approach to the management of litter on the site will be to:

- Ensure waste delivery occurs within the receival hall.
- Operate a wheel wash facility to remove mud and any potential litter from trucks leaving the site.
- Provide litter bins for staff on site.
- Include in environmental awareness training for staff.
- Include litter observations in regular site inspections.

10.12.3 Activities/frequency

The following will be undertaken:

- Clearing litter bins – weekly
- Site inspections to include observations for litter – as required.
- Collection/clean-up of litter identified during inspections – as required.

10.12.4 Performance indicators/targets

The performance indicators/targets are:

- No litter on the site during regular inspections
- No litter complaints

10.12.5 Reporting and review

- Any litter issues will be reported at toolbox or site meetings.
- Complaints will be reported at toolbox or site meetings.
- A record of all inspections will be kept on file.

10.13 Pests, vermin, and noxious weed management

10.13.1 Environmental goals and principles

Pests, vermin, and noxious weed management aims to:

- Minimise the sources of food and habitat for pests and vermin.
- Use professional pest exterminators/controllers if an outbreak is detected.
- Prevent spread of weeds off site to the surrounding areas.

10.13.2 Management strategy

The approach to manage pests, vermin and declared noxious weeds on the site will be to:

- Implement measures to manage pests, vermin and declared noxious weeds on the site.
- 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 in sufficient numbers to post an environmental hazard, or cause the loss of amenity in the surrounding area.

Management measures include:

- Tipping of all waste is to occur within the receival hall
- Regular inspections for pests/vermin/weed on the site.
- Treatment of any infestations detected in incoming waste or within the facility immediately.
- Engagement of a registered pest exterminator/controller for any treatment of detected infestations

10.13.3 Activities/frequency

The following will be undertaken:

- Site inspections for pest/vermin/weed on the site – 6 monthly.
- Weed control – yearly as a minimum.
- Pest inspection – yearly
- Treatment of any detected pest/vermin/weed infestation – on occurrence.

10.13.4 Performance indicators/targets

The performance indicators/target is:

- No pests, vermin, and noxious weeds on the site

10.13.5 Reporting and review

- A record of all inspections will be kept on file.
- Any issues will be reported at toolbox or site meetings.
- Complaints will be reported at toolbox or site meetings.

12. Environmental monitoring

12.1 Objectives

Environmental monitoring programs will be implemented during operation of the facility to ensure ongoing compliance with the Conditions of Approval and to ensure that ResourceCo maintains a high level of environmental performance.

Each monitoring program has been designed in accordance with the relevant regulatory requirements with the aim of achieving the specific objectives and targets for the relevant environmental aspect.

12.2 Quality assurance

Each monitoring program will include quality assurance (QA) and quality control (QC) components. The primary aim of the QA/QC program is to ensure the integrity of the samples and analytical results. QA/QC procedures for sampling are designed in accordance with relevant guidelines and standard practice, including Australian Standards and EPA Approved Methods.

QA/QC procedures for analysis are maintained and implemented by individual laboratories used for sample analysis. All samples collected during operation of the facility will be sent to NATA accredited laboratories for analysis. This process will ensure that analysis of all samples is conducted in accordance with NATA accredited methods and procedures for quality control.

12.3 Reporting

Reporting on the outcomes of monitoring will be undertaken on a regular basis. Monitoring reports will include:

- Monitoring objectives
- Details of the sampling program, including sample locations, type, frequency of sampling, analytes that will be collected.
- QA/QC program including number and type of samples collected.
- Description of environmental conditions during sampling, e.g., weather
- Analytical results
- Summary of any exceedances
- Discussion of the results in the context of limits prescribed by the Conditions of Approval and/or EPL conditions.
- Recommendations for management measures
- Recommendations for future monitoring.

A schedule of reporting, auditing, and monitoring requirements is presented in Table 9. The specific reporting requirements for monitoring are detailed in each of the relevant sub plans.

Table 9 Schedule of reporting, auditing, and monitoring requirements.

Area of management	Action	Frequency
Audits and reviews		
	Annual environmental review	Annually
	EMS corporate audit	Annually
	ISO 14001 re-certification audit	As required
	Independent environmental audit	Within six months of commencement of operations, and every three years thereafter
	Review of monitoring results	Monthly
Inspections and monitoring		
Energy from waste management	Inspection and screening of all incoming loads	On occurrence
Erosion and sediment control	Inspections of all drainage and sediment controls on site, including water storage, pumps and pipes, silt fences	Monthly
	Water quality monitoring	As per Water Management Plan
Stormwater management	Inspections of all water structures on site	Monthly
	Water quality monitoring	As per Water Management Plan
Leachate management	Water quality monitoring	As per Leachate Management Plan
Noise management	Noise monitoring	Once within six months of commencement of operations Thereafter if operations change significantly (and increase noise) Upon receipt of a valid noise complaint
Air quality	Dust observations	Daily
Waste management	Inspection of onsite sorting and storage of recyclables	Monthly
	Inspection of all incoming loads	On occurrence
Traffic management	Inspection of all loads to make sure they are covered	On occurrence
	Inspection of the site entrance for waste accumulation	Weekly
	Inspection of road pavements for damage conditions	Monthly
Complaints	Check complaints register	Monthly
Hazards	Check spill kits and firefighting equipment	3 monthly
Landscape management	Check of landscaping areas for weed infestation, health of planted trees and presence of appropriate sediment controls	6 monthly
Litter management	Inspections to include observations for litter	As required

Area of management	Action	Frequency
Reporting		
Waste reporting	Weighbridge data including waste type, PEF category, amount of waste (in tonnes)	Daily, and retained for the life of the facility
	Waste tracking, sampling, and classification	As required, and retained for the life of the facility
Outgoing material	Type, quantity, and destination of all material produced on site and transported off-site as product or waste	Daily, retained on site for the life of the facility and be kept readily available for inspection by the EPA and the Secretary of the Department of Planning and Environment
Incidents	Notification of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment – DPE and other relevant agencies	Immediately upon becoming aware of the incident. Written notification within 7 days of the incident
Regular reporting	Environmental performance data on ResourceCo website	As per reporting arrangements
Annual return	Annual return for EPL	Yearly per EPL requirements

13. References

AS 1055 Acoustics - Description and measurement of environmental noise

AS 1940 - The Storage and Handling of Flammable and Combustible Liquids

AS 3833:2007 – The storage and handling of mixed classes of dangerous goods, in packages and intermediate bulk containers

NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants handbook.

AS/NZS ISO 14001 Environmental Management Systems – Specifications with Guidance for Use

AS/NZS ISO 8402 Quality Assurance and Quality Management Vocabulary

Nexus Environmental Planning Pty Ltd, 8 March 2016. 'Waste and Resource Management Facility' SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

Nexus Environmental Planning Pty Ltd, 28 November 2016. 'Response to Submissions Waste and Resource Management Facility' SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

EPA (2016) Waste Classification Guidelines – Part 1: Classification of Waste

NSW Industrial Noise Policy

Energy from Waste Policy Statement

Approved Methods for the Sampling and Analysis of Air Pollutants in NSW 2007

NATA Accreditation Requirement Guidelines

Environment Operations Act 1997

- Section 120 - Pollution of waters
- Section 129 – Potentially offensive odour

Appendices

Appendix A – Development Consent (Conditions of Approval)

Appendix B – Environment Protection Licence

Appendix C – Facility Process Flow Diagram

Appendix D – Occupational Health and Safety Policy

Appendix E – Environment Policy

Appendix F – Site layout

Appendix G – Incoming waste customer pre-qualification procedure (PROC 28)

Appendix H – Waste Receival Inspection Officer Role Description

Appendix I – Asbestos Management Plan

Appendix J – PROC 205 *Hazardous Materials Response Management plan(including Dangerous Goods and Sharps)*

Appendix K – Energy from Waste Management Plan

Appendix L – Air Quality Management Plan

Appendix M – Water Management Plan

Appendix N – Leachate Management Plan

Appendix O – Landscape Management Plan

Appendix P – Emergency plan - Pollution incident response management plan Wetherill Park ResourceCo RRF 27.05.2022

Appendix Q – Environmental Complaints Procedure (PROC 9.1)

Appendix R – Incident Reporting and Investigation Procedure (PROC 12)

Appendix S Waste Monitoring Program

Appendix T Operations site plan Wetherill Park ResourceCo RRF 2

Appendix U Maintenance Schedule

PROC CR-MP001 – Operational Environment Management Plan.

Procedure Owner	**HSEQ Manager.**
Procedure Approver	HSEQ Manager
Approved Date	14/03/2018
Last Review Date	01/03/2024
Next Review Date	01/03/2025

Related Documents (*Forms, Policies or SOP*)	**Ownership**
CR-MP002 Energy from Waste Management plan	HSEQ Manager.
CR-MP003 Air Quality Management Plan	HSEQ Manager.
CR-MP004 Water Management Plan.	HSEQ Manager.
CR-MP006 Landscape Management Plan.	HSEQ Manager.
CR-MP007 Pollution Management Plan.	HSEQ Manager,
CR-MP009 Operations Site Plan.	HSEQ Manager.
CR-MP012 Waste Monitoring Plan	HSEQ Manager.

ANY AGREED VARIANCES

Variation	**Site**