ResourceCo RRF Pty Ltd

Operational Environmental Management Plan

Wetherill Park RRF July 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

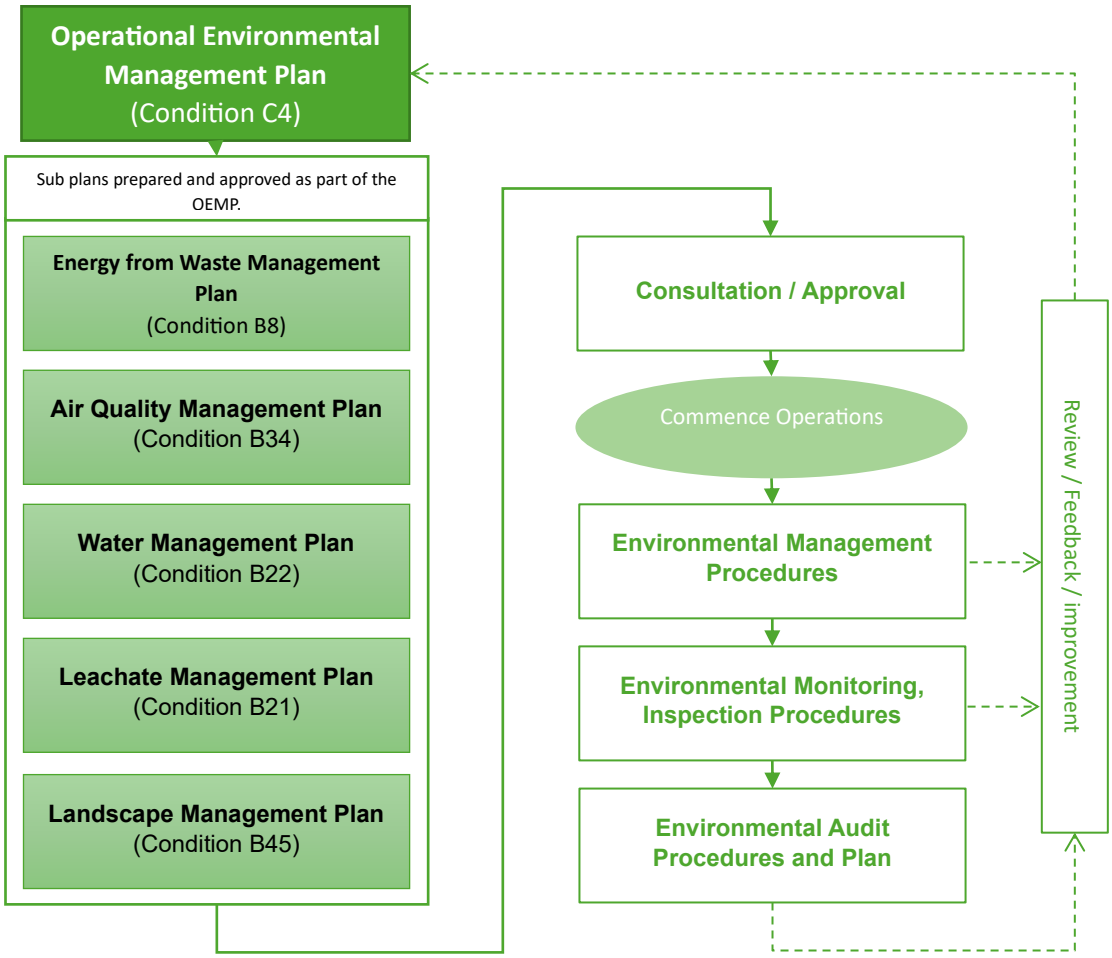

Figure 1 Operational environmental management document structure

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)
- *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*
- *Waste Avoidance and Resource Recovery Act 2001*
- *Sydney Water Act 1994*
- *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.

Primary legislation applies to the operation as described in Table 5.

Table 5 Primary Environmental Legislation

Legislation	Implications on Operation
Environmental Planning and Assessment Act 1979 (EP&A Act)	Site has a development approval with conditions.

Protection of the Environment Operations Act 1997 (POEO Act)	Site has an Environmental Protection Licence (EPL).
Protection of the Environment Operations (Noise Control) Regulation 2017	Noise conditions on EPL, use of power tools, mobile and fixed plant.
Protection of the Environment Operations (General) Regulation 2022	Site has an Environmental Protection Licence (EPL).
Protection of the Environment Operations (Clean Air) Regulation 2022	Use of diesel fuel on site, mobile plant, forklifts
Protection of the Environment Operations (Waste) Regulation 2014	Intake of waste.
Waste Avoidance and Resource Recovery Act 2001	Site conducts resource recovery activities.
Sydney Water Act 1994	Site collects and stores rainwater, discharges wastewater to sewerage system.
Work Health and Safety Act 2011	Duties under Act
Road Transport Act 2013	Duties under chain of responsibility
Contaminated Land Management Act 1997	Site is on contaminated land under Act.

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 6 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.

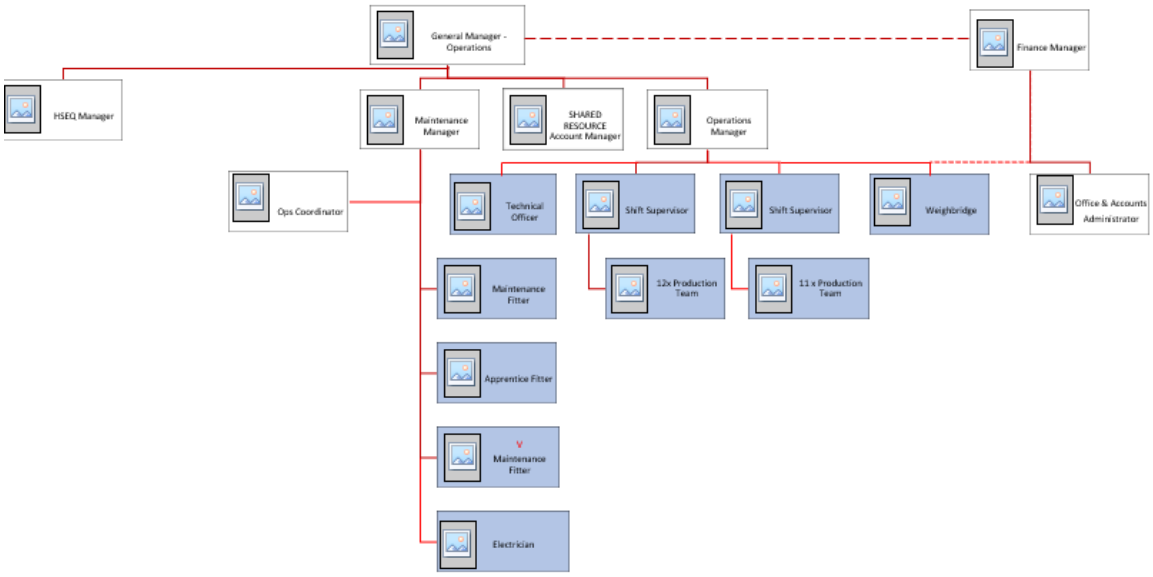

Figure 2 Organisational structure

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 – dust, noise, stormwater and waste management.
- Environmental controls – dust suppression sprinklers, polo citrus foam, indoor facility, waste storage indoors etc.
- 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):

Table 7 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 CR-PR236 *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 CR-PR236 *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 lists the types of amendments that would be considered minor and major, and the approval process.

Table 8 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 9
- No noise complaints

Table 9 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 . The specific reporting requirements for monitoring are detailed in each of the relevant sub plans.

Table 10 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)

SCHEDULE 2
PART A: ADMINISTRATIVE CONDITIONS
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT
A1. In addition to meeting the specific performance criteria established under this consent, the Applicant
must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the development.

TERMS OF CONSENT
A2. The Applicant, in acting on this consent, must carry out the development in accordance with the:
(a) Development Application (SSD 7256);
(b) EIS;
(c) RTS;
(d) conditions in Schedule 2;
(e) development layout plans and drawings listed at Appendix 1; and
(f) the Management and Mitigation Measures as identified in Appendix 2.
A3. 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 this consent shall prevail to the extent of any inconsistency.
A4. The Applicant must comply with all written requirement(s) of the Secretary arising from the Department's assessment of:
(a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent;
(b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the consent; and
(c) the implementation of any actions or measures contained in these documents.

LIMITS OF CONSENT
A5. This consent lapses five years after the date from which it operates, unless the development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EP&A Act.
A6. The Applicant must not receive or process on the site more than 250,000 tonnes per annum (tpa) of
waste, as defined in this consent.
A7. Incoming waste must only be transported to the site in trucks from pre-qualified customers delivering
targeted waste streams, in line with Table 1 of the NSW *Energy from Waste Policy Statement.*

STAGED SUBMISSION OF PLANS OR PROGRAMS
AB. With the approval of the Secretary, the Applicant may:
(a) submit any strategy, plan or program required by this consent on a progressive basis; and/or
(b) combine any strategy, plan or program required by this consent.
A9. If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or
program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined must be demonstrated.

EVIDENCE OF CONSULTATION
A10. Where consultation with any public authority is required by the conditions of this consent, the Applicant must:
(a) consult with the relevant public authority prior to submitting the required documentation to the Secretary or the PCA for approval, where required;
(b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and

(c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Appl icant or any person acting on this development consent.

DISPUTE RESOLUTION

A11. In the event that a dispute arises between the Applicant and Council or a public authority, in relation
to an applicable requirement in this consent or relevant matter relating to the development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.

STATUTORY REQUIREMENTS

A12. The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.

DEMOLITION

A13. The Applicant must ensure that all demolition associated with the development is carried out in accordance with Australian Standard AS 2601 :2001: The Demolition of Structures, or its latest version and the requirements of the Work Health and Safety Regulation, 2011 .

STRUCTURAL ADEQUACY AND CERTIFICATION

A14. The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA.

A15. Prior to the commencement of construction, the final design of the development must be finalised in
consultation with and to the satisfaction of Fire and Rescue NSW and include suitable additional provisions for special hazards by specifically addressing Clauses E1 .10 and E2.3 of Volume One of the National Construction Code (NCC) Series.

A16. Prior to the issue of a Construction Certificate for a building or structure, a Construction Certificate
(Engineering Approval) must be submitted to the Certifying Authority for the construction of a new inlet pit and alteration of an existing pit and the connection of the drainage pipe into the existing stormwater drainage pipe within the easement, laybacks, access driveways and replacement of damaged footpaths, in accordance with approved plans.

UTILITIES AND SERVICES

A17. Prior to the construction of any utility works associated with the development, the Applicant must obtain the relevant approvals from service providers.

A18. Prior to the commencement of operation, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.

A19. Prior to the issue of the Final Occupation Certificate, adjustments to any public utilities necessitated
by the development are to be completed in accordance with the requirements of the relevant Authority. Any utility costs are to be at no cost to Council.

PROTECTION OF PUBLIC INFRASTRUCTURE

A20. Prior to the commencement of earthworks, the Applicant must:
(a) consult with the relevant owner and/or provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure;
(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and
(c) submit a copy of this report to the Secretary and Council.

A21. The Applicant must:
(a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the development; and
(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.

DEVELOPMENT CONTRIBUTIONS
A22. Prior to the issue of a Construction Certificate for any part of the development, the Applicant must pay $241,930 to Council in accordance with the Fairfield City Council Indirect (Section 94A) Development Contributions Plan 2011 .
Note: The contribution amount payable may be adjusted at the date of payment. Any unpaid contributions will be adjusted on a quarterly basis to account for movements in the Australian Bureau of Statistics, Producer Price Index - Building Construction (New South Wales).

OPERATION OF PLANT AND EQUIPMENT
A23. The Applicant must ensure that all plant and equipment used for the development is:
(a) maintained in a proper and efficient condition; and
(b) operated in a proper and efficient manner.

SURRENDER OF CONSENTS
A24. In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant must and in the manner prescribed by clause 97 of the EP&A Regulation, surrender all current development consents associated with the site prior to the issue of an Occupation Certificate for the development.

PART B: ENVIRONMENTAL PERFORMANCE AND MANAGEMENT
WASTE MANAGEMENT
Waste Screening and Acceptance
81. The Applicant must:
(a} implement auditable procedures to:
(i) screen incoming waste loads;
(ii} ensure that waste is not accepted at the site that is not permitted by the EPL; and
(iii) handle and dispose of hazardous waste such as asbestos, sharps and chemical/biological waste that have, despite procedures developed for (ii} above, been received on site.
(b) ensure that:
(i} all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and
(ii} staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited wastes such as asbestos.

Waste Storage and Processing
82. Waste must be secured and maintained within designated waste storage areas at all times and must
not leave the site onto neighbouring public or private properties.
83. All processed and unprocessed waste must be stored within the building on the site. Processed, wrapped and baled PEF may be stored in the area designated on the approved plans in Appendix 1 for the outdoor storage of PEF.
Statutory Requirements
84. All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste.
85. Waste generated outside the site must not be received at the site for storage, treatment, processing,
reprocessing, or disposal, except as expressly permitted by an EPL.
86. The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.
87. The Applicant must retain all sampling and waste classification data for the life of the development and keep it readily available for inspection by the EPA and the Secretary.

Energy from Waste Management Plan
88. Prior to the commencement of operations, the Applicant must prepare an Energy from Waste Management Plan (EfWMP). The EfWMP must:
(a} be prepared in consultation with the EPA and to the satisfaction of the Secretary;
(b) detail the procedures to ensure full and ongoing compliance with the NSW Energy from Waste Policy, including:
(i) details of how the receipt of incoming waste (feedstock} from waste processing facilities or collection systems complies with the resource recovery criteria specified in Table 1 of the EPA's Energy from Waste Policy Statement for each waste stream;
(ii) details of how the Applicant will compile and calculate percentages of incoming waste

streams every three months and retain this information for submission to the EPA on request;
(iii} a procedure for providing evidence to the EPA that incoming material was previously going to landfill;
(iv) a procedure for the management of out of specification PEF; and
(v) a requirement that out of specification PEF material would not be reprocessed until further analysis demonstrates that it meets the relevant criteria.

(c) define calibration procedures and operating thresholds for the online analyser that will be used to measure real-time chlorine, calorific value and moisture content of the PEF.

B9. The Applicant shall ensure the Energy from Waste Management Plan (as required and approved by
the Secretary from time to time) is implemented for the operational life of the development.

Waste Monitoring Program

B10. From the commencement of operation, the Applicant must implement a Waste Monitoring Program
for the development. The program must:
(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;
(b) include suitable provision to monitor on a daily basis the:
(i) quantity, type and source of waste received on site; and
(ii) quantity, type, quality and destination of the outputs produced on site;
(c) ensure that:
(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and
(ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste, including asbestos; and
(d) require that all weighbridge data be retained for the life of the development and be made immediately available on request to the Secretary and/or the EPA.

Construction Waste Management

B11 . Prior to the commencement of construction, the Applicant must prepare a Construction and Demolition Waste Management Plan for the development to the satisfaction of the Secretary. The plan must form part of the CEMP required by Condition C1 and must:
(a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and
(b) be implemented for the duration of construction works.

Pests, Vermin and Noxious Weed Management

B12. The Applicant must:
(a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and
(b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.
Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.

SOILS AND WATER

Imported Soil

B13. The Applicant must:
(a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site;
(b) keep accurate records of the volume and type of fill to be used; and
(c) make these records available to the Department upon request.

Erosion and Sediment Control

B14. Prior to the commencement of earthworks, the Applicant must install and maintain suitable erosion
and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.

Discharge Limits

B15. The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.

Stormwater Management System

B16. The Applicant must design, install and operate a stormwater management system for the development. The system must:

(a) ensure the system is designed by a suitably qualified and experienced person(s), generally in accordance with the conceptual design in the EIS and applicable Australian Standards and in consultation with Council;

{b) ensure that the system capacity has been designed in accordance with Managing Urban Stormwater- Soils and Construction Vol. 1 (Landcom, 2004);

(c) divert existing clean surface water around operational areas of the site;

(d) direct all sediment laden water in overland flow away from the leachate management system; and

(e) prevent cross-contamination of clean and sediment or leachate laden water.

B17. Prior to the issue of a Construction Certificate, a certificate must be submitted to the Certifying Authority certifying that:

(a) satisfactory arrangements have been made for the disposal of stormwater;

(b) the proposed development and alterations to the natural surface contours will not impede or divert natural surface water runoff so as to cause a nuisance to adjoining properties; and

(c) the piped drainage system has been designed to Council's Stormwater Drainage Policy.

B18. Prior to the issue of the Final Occupation Certificate, Works-As-Executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved must be submitted to the Certifying Authority.

B19. The stormwater drainage generated from the development must be directed to:

(a) the drainage easement; and

(b) Council's street kerb and gutter.

B20. All stormwater drains/pits on the site must be provided and maintained with the message; "This pit
drains to the Georges River". Lettering must be 100mm high block bold yellow painted lettering. Paints used must be of road line marking standard.

Leachate Management Plan

B21. Prior to the commencement of operation, the Applicant must prepare a Leachate Management Plan
for the management of leachate and firewater at the site, including any possible leachate generated around the baling and wrapping area. The leachate system must:

(a) be designed by a suitably qualified and experienced person(s) in consultation with FRNSW;

{b) provide a management protocol for leachate and firewater;

(c) control leachate and firewater so that they do not mix with any stormwater on the site; and

{d) include water quality monitoring to determine the performance of the leachate management system.

Water Management Plan

B22. Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to
the satisfaction of the Secretary. The Water Management Plan must:

(a) form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6;

(b) be prepared in consultation with DPI;

(c) detail water use, metering, disposal and management on-site;

(d) detail the water licence requirements for the development;

(e) detail the management of wastewater streams on-site, including leachate and firewater;

(f) contain a Surface Water Management Plan, including;

(i) a program to monitor:

- surface water flows and quality; and
- surface water storage and use;

(ii) sediment and erosion control plans;

(iii) surface water impact assessment criteria, including trigger levels for investigating potential adverse surface water impacts; and

(iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.

B23. The Applicant shall ensure the Water Management Plan (as required and approved by the Secretary
from time to time) is implemented for the operational life of the development.

NOISE

Construction and Operation Hours

B24. The Applicant must comply with the hours detailed in **Table 1,** unless otherwise agreed in writing by the Secretary.

Table 1: Hours of Work

Activity	Day	Time
Earthworks and construction	Monday – Friday Saturday	7:00 am to 6:00 pm 8:00 am to 1:00 pm
Operation – waste receival	Monday – Saturday	5:00 am to 5:00 pm
Operation – waste processing (plant operation)	Monday – Friday Saturday Sunday	6:00 am to 10.30 pm 6:00 am to 5:00 pm 8:00 am to 6:00 pm
Operation – removal of materials	Monday – Friday Saturday and Sunday	5:00 am to 10.30 pm (PEF only) 5:00 am to 5:00 pm (recyclable materials and residual waste) No PEF, recyclable materials and/or residual waste removal

B25. Works outside of the hours identified in Condition 824 may be undertaken in the following circumstances:
(a) works that are inaudible at the nearest sensitive receivers;
(b) works agreed to in writing by the Secretary;
(c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or
(d) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.

Construction Noise Limits

B26. The development must be constructed to achieve the construction noise management levels detailed
in the *Interim Construction Noise Guideline* (Department of Environment and Climate Change, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in the EIS.

Construction Noise Management

B27. Prior to the commencement of construction, the Applicant must consult with neighbouring properties
regarding the scheduling of high noise generating construction works such as excavation and bulk earth works. The Applicant must provide to the Department with the results of such consultation before construction commences.

Operational Noise Limits

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

Table 2: Noise Limits dB(A)

Location	Day $L_{Aeq(15\ minute)}$	Evening $L_{Aeq(15\ minute)}$	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.*

Noise Mitigation

B29. The Applicant must:
(a) implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development;
(b) minimise the noise impacts of the development during adverse meteorological conditions;
(c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and
(d) regularly assess noise emissions and relocated, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.

Road Traffic Noise

B30. Prior to the commencement of construction, the Applicant must prepare a Driver Code of Conduct
and induction training for the development to minimise road traffic noise. The Applicant must update the Driver Code of Conduct and induction training for construction and operation and must implement the Code of Conduct for the life of the development.

AIR QUALITY

Meteorological Station

B31. Prior to the commencement of any works on-site, the Applicant must install and subsequently maintain during the life of the development, a suitable meteorological station on the site that complies with the requirements in the EPA's *Approved Methods for Sampling of Air Pollutants in New South Wales.*

Dust Minimisation

B32. The Applicant must implement all reasonable and feasible measures to minimise dust generated during demolition, earthworks, construction and operation of the development.
B33. During construction, the Applicant must ensure that:
(a) exposed surfaces and stockpiles are suppressed by regular watering;
(b) all trucks entering or leaving the site with loads have their loads covered;
(c) trucks associated with the development do not track dirt onto the public road network;
(d) public roads used by these trucks are kept clean; and
(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.

Air Quality Management Plan

B34. Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Secretary. The AQMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6. The AQMP must:
(a) detail and rank all emissions from all sources of the development, including particulate emissions;
(b) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;
(c) identify the control measures that that will be implemented for each emission source; and
(d) nominate the following for each of the proposed controls:
    (i) key performance indicator;
    (ii) monitoring method;
    (iii) location, frequency and duration of monitoring;
    (iv) record keeping;
    (v) complaints register;
    (vi) response procedures; and
    (vii) compliance monitoring.

B35. The Applicant shall ensure the Air Quality Management Plan (as required and approved by the Secretary from time to time) is implemented for the operational life of the development.

Odour Management

B36. The Applicant must ensure the development does not cause or permit the emission of any offensive
odour (as defined in the POEO Act).

TRAFFIC AND ACCESS

Roadworks and Access

B37. All vehicular crossings must be located a minimum of one metre from any utility pillar/pole. Prior to
the commencement of construction, the Applicant must prepare detailed design plans to the satisfaction of Council, demonstrating the access width is in accordance with AS 2890.2-2002 to accommodate the turning path of the largest servicing vehicle. The Applicant must also liaise with Council's Subdivision Branch regarding replacing the drainage pit grate located within the western vehicular crossing.

B38. All trucks leaving the operational site must depart via a wheel wash facility to prevent mud, dust or
debris from being deposited on Council roads. The wheel wash facility must be designed and constructed in consultation with Council and to the satisfaction of the Secretary prior to commencement of operations.

Parking

B39. Prior to the commencement of operations, the Applicant must provide 42 on-site parking spaces for visitors and staff. Parking areas are to be constructed in accordance with the latest version of AS 2890.1.

Construction Traffic Management Plan

B40. The Applicant must prepare a Construction Traffic Management Plan for the development to the satisfaction of the Secretary prior to the commencement of construction. The plan must form part of the CEMP required by Condition C1 and must:

(a) be prepared by a suitably qualified and experienced person(s), in consultation with Council;

(b) detail the measures that would be implemented to ensure road safety and network efficiency during earthworks and construction;

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

(d) include a Driver Code of Conduct to:

- (i) minimise the impacts of earthworks and construction on the local and regional road network;
- (ii) minimise conflicts with other road users;
- (iii) minimise road traffic noise; and
- (iv) ensure truck drivers use specified routes;

(e) include a program to monitor the effectiveness of these measures; and

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

Operating Conditions

B41. The Applicant must ensure:

(a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1 and AS 2890.2;

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

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

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

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

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

(g) all vehicular entries and exits must be made in a forward direction;

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

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

HAZARDS AND RISK
Dangerous Goods
B42. Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.

Further Requirements
B43. The Applicant must store all chemicals, fuels and oils used on-site in accordance with:
(a) all requirements of all relevant Australian Standards; and
(b) the NSW EPA's *'Storing and Handling of Liquids: Environmental Protection - Participants Handbook'* if the chemicals are liquid.
In the event of an inconsistency between the requirements listed from a) to b) above, the most stringent requirement shall prevail to the extent of the inconsistency.

CONTAMINATION
B44. Prior to the commencement of construction, the Applicant must prepare an unexpected finds protocol
to ensure that potentially contaminated material is appropriately managed. The protocol must form part of the CEMP required by Condition C1 and must ensure any material identified as contaminated shall be disposed off-site, with the disposal location and results of testing submitted to Council, prior to its removal from the site.

VISUAL AMENITY
Landscaping
B45. Prior to the commencement of operation, the Applicant must prepare a Landscape Management Plan to manage the landscaping works on-site, to the satisfaction of the Secretary. The plan must form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The plan must:
(a) detail the species to be planted on-site;
(b) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and
(c) be consistent with the Applicant's Management and Mitigation Measures at Appendix 2.
B46. The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by Condition 845 for the life of the development.

Building Materials
B47. The Applicant must carry out the development in accordance with the External Material Schedule shown on drawing numbers SK1103, SK3101 and SK3102 in Appendix 1, unless otherwise agreed by the Secretary.

Lighting
B48. The Applicant must ensure the lighting associated with the development:
(a) complies with the latest version of *AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting;* and
(b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.

PART C: ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN
C1 . The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Secretary. The CEMP must:
(a) be approved by the Secretary prior to the commencement of construction;
(b) identify the statutory approvals that apply to the development;
(c) outline all environmental management practices and procedures to be followed during construction works associated with the development;
(d) describe all activities to be undertaken on the site during construction of the development, including a clear indication of construction stages;
(e) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts;
(f) describe the roles and responsibilities for all relevant employees involved in construction works.

associated with the development; and
(g) include the management plans required under Condition C2 of this consent.
C2. As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following:
(a) Construction Traffic Management Plan (see Condition B40);
(b) Erosion and Sediment Control Plan (see Condition B14); and
(c) Construction and Demolition Waste Management Plan (see Condition B11).
C3. The Applicant must carry out the construction of the development in accordance with the CEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN
C4. The Applicant must prepare an 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;
(b) be prepared by a suitably qualified and experienced expert;
(c) provide the strategic framework for environmental management of the development;
(d) identify the statutory approvals that apply to the development;
(e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;
(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;
    (ii) receive, handle, respond to, and record complaints;
    (iii) resolve any disputes that may arise;
    (iv) respond to any non-compliance;
    (v) respond to emergencies; and
(g) include the following environmental management plans:
    (i) Energy from Waste (see Condition B8);
    (ii) Air Quality (see Condition B34);
    (iii) Water (see Condition B22); and
    (iv) Leachate (see Condition B21).
CS. The Applicant must operate the development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.

MANAGEMENT PLAN REQUIREMENTS
C6. The Applicant must ensure that the environmental management plans required under Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include:
(a) detailed baseline data;
(b) a description of:
    (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);
    (ii) any relevant limits or performance measures/criteria; and
    (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;
(c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;
(d) a program to monitor and report on the:
    (i) impacts and environmental performance of the development; and
    (ii) effectiveness of any management measures (see (c) above);
(e) a contingency plan to manage any unpredicted impacts and their consequences;
(f) a program to investigate and implement ways to improve the environmental performance of the development over time;
(g) a protocol for managing and reporting any:
    (i) incidents;
    (ii) complaints;
    (iii) non-compliances with statutory requirements; and
    (iv) exceedances of the impact assessment criteria and/or performance criteria; and
(h) a protocol for periodic review of the plan.

Revision of Strategies, Plans and Programs
C7. Within three months of:
(a) approval of a modification;
(b) approval of an annual review under Condition C8;
(c) submission of an incident report under Condition C10; or
(d) completion of an audit under Condition C12,
the Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.
Note: *This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.*

ANNUAL REVIEW
C8. Each year, the Applicant must review the environmental performance of the development to the satisfaction of the Secretary. This review must:
(a) describe the development that was carried out 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.

REPORTING
Incident Reporting
C9. The Applicant must notify the Secretary and any other relevant agencies of any incident or potential
incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the development immediately after the Applicant becomes aware of the incident.
C10. Within seven days of the date of this incident, the Applicant must provide the Secretary and any relevant agencies with a detailed report on the incident.

Regular Reporting
C11. The Applicant must provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.

AUDITING
Independent Environmental Audit
C12. Within six months of the commencement of operation, and every three years thereafter, unless the
Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This 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.

Note: *This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.*

C13. Within two months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

ACCESS TO INFORMATION

C14. The Applicant must:

(a) make copies of the following publicly available on its website:

(i) the documents referred to in Condition A2;
(ii) all current statutory approvals for the development;
(iii) all approved strategies, plans and programs required under the conditions of this consent;
(iv) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
(v) a complaints register updated on a monthly basis;
(vi) the annual reviews of the development;
(vii) any independent environmental audit of the development and the Applicant's response to the recommendations in any audit;
(viii) any other matter required by the Secretary; and

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

Appendix B – Environment Protection Licence

Information about this licence

Dictionary

A definition of terms used in the licence can be found in the dictionary at the end of this licence.

Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- ensure persons associated with you comply with this licence, as set out in section 64 of the Act;
- control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act);
- report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

Variation of licence conditions

The licence holder can apply to vary the conditions of this licence. An application form for this purpose is available from the EPA.

The EPA may also vary the conditions of the licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

Licence review

The Act requires that the EPA review your licence at least every 5 years after the issue of the licence, as set out in Part 3.6 and Schedule 5 of the Act. You will receive advance notice of the licence review.

Fees and annual return to be sent to the EPA

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

Environment Protection Licence

The EPA publication "A Guide to Licensing" contains information about how to calculate your licence fees. The licence requires that an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints), be submitted to the EPA. The Annual Return must be submitted within 60 days after the end of each reporting period. See condition R1 regarding the Annual Return reporting requirements.

Usually the licence fee period is the same as the reporting period.

Transfer of licence

The licence holder can apply to transfer the licence to another person. An application form for this purpose is available from the EPA.

Public register and access to monitoring data

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications;
- licence conditions and variations;
- statements of compliance;
- load based licensing information; and
- load reduction agreements.

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

This licence is issued to:

RESOURCECO WPRRF PTY LTD
35-37 FRANK ST
WETHERILL PARK NSW 2164

subject to the conditions which follow.

Environment Protection Licence

Licence - 20937

1 Administrative Conditions

A1 What the licence authorises and regulates

A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity	Fee Based Activity	Scale
Resource recovery	Recovery of general waste	Any general waste recovered
Waste storage	Waste storage - other types of waste	Any other types of waste stored

A2 Premises or plant to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
RESOURCECO
35-37 FRANK STREET
WETHERILL PARK
NSW 2164
LOT 31 DP 589097

A3 Information supplied to the EPA

A3.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:
a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

2 Limit Conditions

L1 Pollution of waters

L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L2 Waste

L2.1 The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.
This condition does not limit any other conditions in this licence.

Code	Waste	Description	Activity	Other Limits
NA	General solid waste (non-putrescible)	Dry commercial and industrial waste from the Barangaroo South Precinct as described in the Barangaroo South Operational Waste Management Plan – July 2018.	Resource recovery Waste storage	Maximum of 1000 tonnes to be received at the premises in any 12 month period.
NA	Synthetic fibre waste (from materials such as fibreglass, polyesters and other plastics), but excluding asbestos waste	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	
NA	Wood waste	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	
NA	Glass, plastic, rubber, plasterboard, ceramics, bricks, concrete, metal or timber	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	
NA	Paper or cardboard	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	
NA	Building and demolition waste	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	

L2.2 The authorised amount of waste permitted on the Premises cannot exceed 7,000 tonnes at any one time.

L2.3 All waste activities including storage, processing and loading/unloading must be conducted inside the fully enclosed building on the Premises, except for the baling of waste, including activities associated with baling such as storage and loading of baled waste, and the unloading of waste for baling in the designated baling area to the south of and adjacent to the baler, respectively (as marked by the grid in the site plan of Appendix A of "ResourceCo RRF Operational Management Plan Wetherill Park RRF" dated March 2018 (EPA ref

DOC18/171623))

L2.4 The total amount of waste received at the premises must not exceed 250,000 tonnes per annum.

L2.5 Incoming waste must only be transported to the Premises from pre-qualified customers as per Section 6.2.3 of the "*ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF*" dated March 2018 (EPA ref DOC18/171623)).

L2.6 Incoming waste must comply with resource recovery criteria for each waste stream as specified in Table 4 of the EPA's Energy from Waste Policy Statement.

L2.7 Approval in writing must be sought from the EPA to receive "Mixed commercial and industrial waste" with "No limit by weight..." under Table 4 of the NSW EPA's "NSW Energy from Waste Policy Statement."

L3 Noise limits

L3.1 Noise generated at the Premises must not exceed the noise limits in the Table below.

Location	Day LAeq (15 minute)	Evening LAeq (15 minute)	Night LAeq (15 minute)	Night LA1 (1 minute)
Any residential receiver not associated with the Premises	35 dB(A)	35 dB(A)	35 dB(A)	45 dB(A)

L3.2 For the purpose of condition L3.1;

- Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays.
- Evening is defined as the period 6pm to 10pm.
- Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sunday and Public Holidays.

L3.3 The noise limits set out in condition L3.1 apply under all meteorological conditions except for the following:

- Wind speeds greater than 3 metres/second at 10 metres above ground level.
- Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or
- Stability category G temperature inversion conditions.

L3.4 For the purposes of condition L3.3:

- Data recorded by a meteorological station installed on the Premises must be used to determine
- meteorological conditions; and
- Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the *NSW Industrial Noise Policy*.

L3.5 To determine compliance:

a) with the Leq(15 minute) noise limits in condition L3.1, the noise measurement equipment must be located:

- approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the Premises; or
- within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the Premises; or, where applicable
- within approximately 50 metres of the boundary of a National Park or a Nature Reserve.

b) with the LA1(1 minute) noise limits in condition L3.1, the noise measurement equipment must be located within 1 metre of a dwelling façade.

c) with the noise limits in condition L6.1, the noise measurement equipment must be located:

- at the most affected point at a location where there is no dwelling at the location; or
- at the most affected point within an area at a location prescribed by conditions L3.5(a) or L3.5(b).

L3.6 A non-compliance of condition L3.1 will still occur where noise generated from the Premises in excess of the appropriate limit is measured:

- at a location other than an area prescribed by conditions L3.5(a) and L3.5(b); and/or
- at a point other than the most affected point at a location.

L3.7 For the purposes of determining the noise generated at the Premises the modification factors in Section 4 of the *NSW Industrial Noise Policy* must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.

Note: **Definitions**

- NSW Industrial Noise Policy - the document entitled "*New South Wales Industrial Noise Policy*" published by the Environment Protection Authority in January 2000.
- Noise – 'sound pressure levels' for the purposes of conditions L3.1 to L3.7.

L4 Hours of operation

L4.1 Construction works must only be undertaken:

- between the hours of 7:00am and 6:00pm Monday to Friday;
- between the hours of 8:00am and 1:00pm on Saturdays; and
- at no time on Sundays or public holidays.

L4.2 Works outside of the hours identified in condition L4.1 may be undertaken in the following circumstances:
a) works that are inaudible at the nearest receivers;
b) works agreed to in writing by the Secretary;
c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons;
d) Where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.

L4.3 Activities on the Premises are permitted between the following hours:

Activity	Day	Time
Operation	Monday-Sunday	24 Hours

L5 Potentially offensive odour

L5.1 No condition of this licence identifies a potentially offensive odour for the purpose of Section 129 of the Protection of the Environment Operations Act 1997.

Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potenitally offensive odour and the odour was emitted in accordance with conditions of licence directed at minimising odour.

3 Operating Conditions

O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.
This includes:
a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:
a) must be maintained in a proper and efficient condition; and
b) must be operated in a proper and efficient manner.

O3 Dust

O3.1 Activities occurring in or on the Premises must be carried out in a manner that prevents or minimises the generation of dust.

O3.2 The Premises must be maintained in a condition which prevents or minimises the emission of dust from the Premises.

O3.3 The licensee must ensure no visible dust leaves the Premises.

O3.4 The licensee must ensure that no material, including sediment or oil, is tracked from the Premises.

O4 Emergency response

O4.1 The licensee must prepare, maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises.
NOTE: The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (the POEO Act) and the POEO Regulations.

O5 Waste management

O5.1 Waste stored inside the fully enclosed building on the Premises must be stockpiled in dedicated bays as specified by Figures 2, 3 and 4 of the "Cleanaway ResourceCo Resource Recovery Facility Operations Plan" dated 27 May 2022 (EPA ref DOC22/480545-4).

O5.2 Waste stockpiles stored within the enclosed building must not exceed 4m in height other than for the waste stockpile located in Unprocessed Waste Bay A which must not exceed 2m in height (as identified by Figures 7 and 8 of the "Cleanaway ResourceCo Resource Recovery Facility Operations Plan" dated 27 May 2022 (EPA ref DOC22/480545-4)).

O5.3 The Licensee must install and maintain permanent height markers on, in or immediately adjacent to waste stored within dedicated bays on the Premises. The markers must clearly show the stockpile height limit and be positioned so that a visual check can be made of the height of each stockpile.

O5.4 The Licensee must prepare and implement a documented procedure to ensure that waste on the Premises is stored in accordance with the conditions of this Licence. The Licensee is to keep records demonstrating waste storage compliance on the Premises. Records relating to this waste storage compliance procedure are to be made available to an EPA Authorised Officer upon request.

O6 Other operating conditions

O6.1 Operations at the Premises must be undertaken in accordance with the "*ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF*" dated March 2018 (EPA ref DOC18/171623) unless otherwise specified by a condition of this Licence.

O6.2 Operations at the Premises must be undertaken in accordance with the "*ResourceCo RRF Pty Ltd Energy*

from Waste Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171577) unless otherwise specified by a condition of this Licence.

4 Monitoring and Recording Conditions

M1 Monitoring records

M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.

M1.2 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.

M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:
a) the date(s) on which the sample was taken;
b) the time(s) at which the sample was collected;
c) the point at which the sample was taken; and
d) the name of the person who collected the sample.

M2 Recording of pollution complaints

M2.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.

M2.2 The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.

M2.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M2.4 The record must be produced to any authorised officer of the EPA who asks to see them.

M3 Telephone complaints line

M3.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.

M3.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M3.3 The preceding two conditions do not apply until after the date of the issue of this licence.

5 Reporting Conditions

R1 Annual return documents

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:

1. a Statement of Compliance,
2. a Monitoring and Complaints Summary,
3. a Statement of Compliance - Licence Conditions,
4. a Statement of Compliance - Load based Fee,
5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,
6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
7. a Statement of Compliance - Environmental Management Systems and Practices.

At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

R1.3 Where this licence is transferred from the licensee to a new licensee:
a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:
a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect *EPA* or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:
a) the licence holder; or
b) by a person approved in writing by the EPA to sign on behalf of the licence holder.

R2 Notification of environmental harm

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

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

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

R3 Written report

R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:
a) where this licence applies to premises, an event has occurred at the premises; or
b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.

R3.3 The request may require a report which includes any or all of the following information:
a) the cause, time and duration of the event;
b) the type, volume and concentration of every pollutant discharged as a result of the event;
c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
g) any other relevant matters.

R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

6 General Conditions

G1 Copy of licence kept at the premises or plant

G1.1 A copy of this licence must be kept at the premises to which the licence applies.

G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.

G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

7 Pollution Studies and Reduction Programs

U1 Stormwater Review

U1.1 The Licensee must engage an independent, suitably qualified and experienced person to complete a review of the Premises' Water Management Plan dated 9 March 2018 (the Review). The Review must also include the assessments specified in conditions U1.2, U1.3, and U1.4, and provide a report as required by condition U1.5.

U1.2 The Licensee must engage an independent, suitably qualified and experienced person to conduct a Stormwater Impact Assessment that is to include an assessment of pollutant concentrations and loads following stormwater discharges from the Premises for all sampling events between 6 June 2023 and 6 October 2023. The assessment should include a discussion of the effects of the sampled pollutant loads on the receiving environment with respect to the relevant Australian and New Zealand Environment and Conservation Council (ANZECC)(2000) water quality guidelines.

U1.3 The Licensee must engage an independent, suitably qualified and experienced person to conduct a System Performance Evaluation that is to include:

1. An outline of all currently installed stormwater quality treatment devices and pollution controls, and the corresponding pollutant/s they are designed to control. The outline must include a table showing each pollutant identified by the sampling conducted by the Licensee and the corresponding stormwater treatment device and/or pollution control measure, and identify any pollutants being discharged that are not treated and/or controlled prior to discharging from the Premises.
2. An evaluation of the effectiveness of the currently installed stormwater quality treatment devices and pollution controls on the Premises based on the assessment required by Condition U1.2. The evaluation must also identify additional reasonable and feasible controls and/or treatment devices that may be required to address any pollutants that continue to exceed the ANZECC (2000) assessment criteria as determined in U1.2.
3. Based on the assessment in U1.2 and the evaluation in U1.3, review and update Section 3.5 of the Premises' Water Management Plan to include treatment performance benchmarks based on ANZECC (2000) assessment criteria.

U1.4 The Licensee must prepare an Action Plan to implement improvements and install/maintain additional controls identified by condition U1.3. The Action Plan is to include:

1. An outline of any additional controls and/or treatment devices that are required to meet treatment performance benchmarks based on ANZECC (2000) assessment criteria, and
2. A proposed timeframe for each new control to be installed at the Premises.

U1.5 Provide a Stormwater Management Review Report detailing the findings of U1.2, U1.3 and U1.4, and an updated copy of the Premises' Water Management Plan to the EPA by 5pm 22 December 2023 to info@epa.nsw.gov.au.

8 Special Conditions

E1 Financial Assurance

E1.1 A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the *Banking Act 1959* of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA.

E1.2 The financial assurance must be in favour of the Environment Protection Authority in the amount of five hundred thousand dollars ($500,000). The financial assurance is required to secure or guarantee funding for works or programmes required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by APRA.

E1.3 The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure.

E1.4 The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.

E1.5 The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.

E1.6 The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.

E2 Environmental Obligations of Licensee

E2.1 While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:

a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents.
b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA.
c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.

E2.2 In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must:

a) Make all efforts to contain all firewater on the licensee's premises;
b) Make all efforts to control air pollution from the licensee's premises;
c) Make all efforts to contain any discharge, spill or run-off from the licensee's premises;
d) Make all efforts to prevent flood water entering the licensee's premises;
e) Remediate and rehabilitate any exposed areas of soil and/or waste;
f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of;
g) At the request of the EPA monitor groundwater beneath the licensee's premises and its potential to migrate from the licensee's premises;
h) At the request of the EPA monitor surface water leaving the licensee's premises; and
i) Ensure the licensee's premises is secure.

E2.3 After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:

a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and
b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.

Environment Protection Licence

Licence - 20937

Dictionary

General Dictionary

3DGM [in relation to a concentration limit]	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
Act	Means the Protection of the Environment Operations Act 1997
activity	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
actual load	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
AM	Together with a number, means an ambient air monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.*
AMG	Australian Map Grid
anniversary date	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
annual return	Is defined in R1.1
Approved Methods Publication	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
assessable pollutants	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
BOD	Means biochemical oxygen demand
CEM	Together with a number, means a continuous emission monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.*
COD	Means chemical oxygen demand
composite sample	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
cond.	Means conductivity
environment	Has the same meaning as in the Protection of the Environment Operations Act 1997
environment protection legislation	Has the same meaning as in the Protection of the Environment Administration Act 1991
EPA	Means Environment Protection Authority of New South Wales.
fee-based activity classification	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2009.
general solid waste (non-putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997

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flow weighted composite sample	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
general solid waste (putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environmen t Operations Act 1997
grab sample	Means a single sample taken at a point at a single time
hazardous waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
licensee	Means the licence holder describe d at the front of this licence
load calculation protocol	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
local authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
material harm	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997
MBAS	Means methylene blue active substances
Minister	Means the Minister administering the Protection of the Environment Operations Act 1997
mobile plant	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
motor vehicle	Has the same meaning as in the Protection of the Environment Operations Act 1997
O&G	Means oil and grease
percentile [in relation to a concentration limit of a sample]	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
plant	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
pollution of waters [or water pollution]	Has the same meaning as in the Protection of the Environment Operations Act 1997
premises	Means the premises described in condition A2.1
public authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
regional office	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
reporting period	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 mo nths. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
restricted solid waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
scheduled activity	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
special waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
TM	Together with a number, means a test method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.

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TSP	Means total suspended particles
TSS	Means total suspended solids
Type 1 substance	Means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements
Type 2 substance	Means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements
utilisation area	Means any area shown as a utilisation area on a map submitted with the application for this licence
waste	Has the same meaning as in the Protection of the Environment Operations Act 1997
waste type	Means liquid, restricted solid waste, general solid waste (putrescible), general solid waste (non-putrescible), special waste or hazardous waste
Wellhead	Has the same meaning as in Schedule 1 to the Protection of the Environment Operations (General) Regulation 2021.

Ms Celeste Forestal

Environment Protection Authority

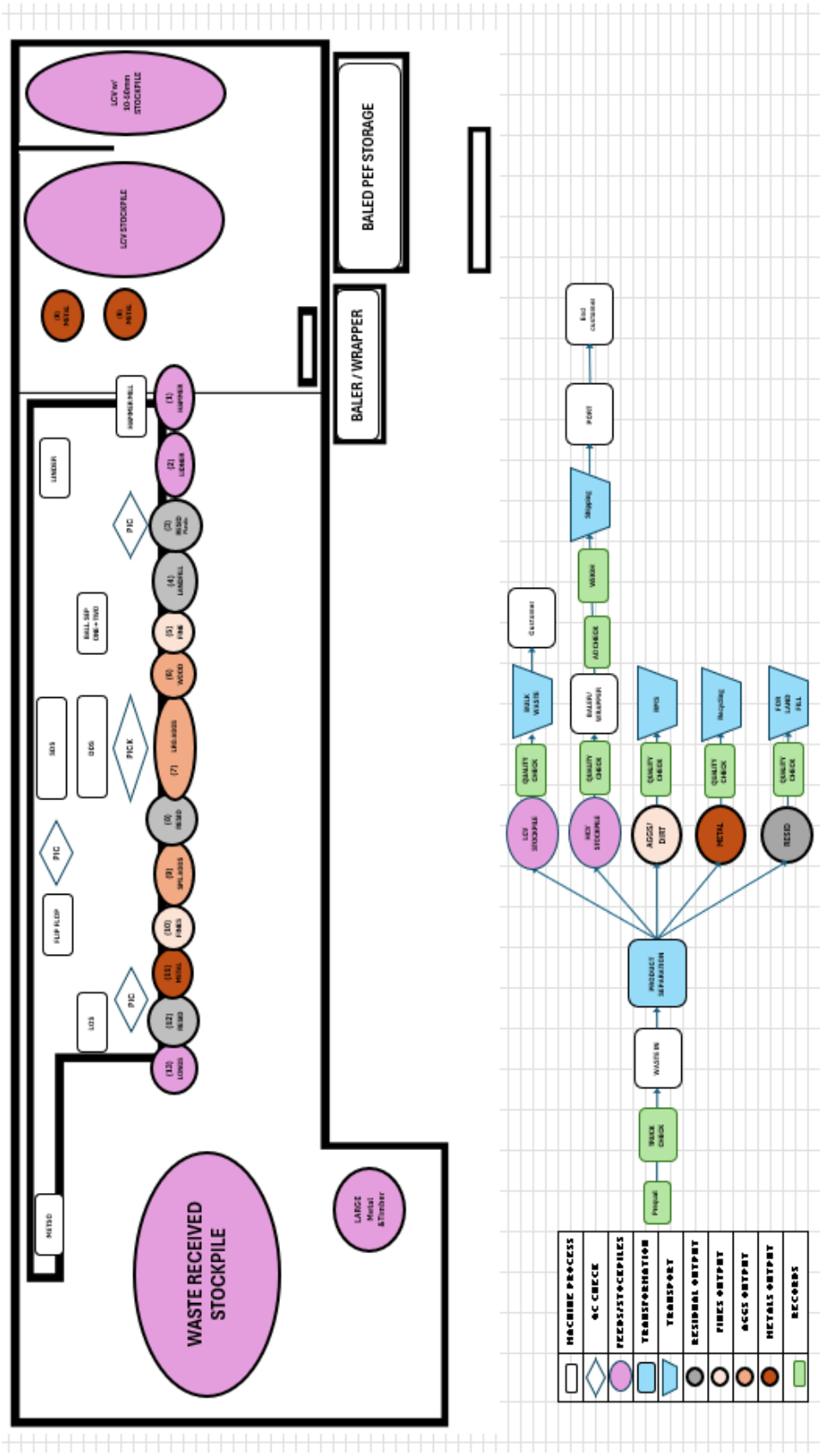
(By Delegation)

Date of this edition: 09-May-2017

End Notes

2	Licence varied by notice 1561945 issued on 14-May-2018
3	Licence varied by notice 1576340 issued on 22-Feb-2019
4	Licence varied by notice 1577846 issued on 30-Apr-2019
5	Licence varied by notice 1583536 issued on 20-Aug-2019
6	Licence varied by notice 1603927 issued on 25-Jan-2021
7	Licence varied by notice 1623883 issued on 06-Jun-2023
8	Licence format updated on 10-Feb-2025

Appendix C – Facility Process Flow Diagram



Appendix D – Occupational Health and Safety Policy

POLICY

POL 01 - HEALTH & SAFETY POLICY

ResourceCo values all workers that contribute to the success of the business. Henceforth, the term "workers" will be used to define any employee, contractor or labour hire person who is 'working' for ResourceCo in some capacity.

Purpose

ResourceCo considers the health and safety of our workers to be of primary importance. ResourceCo accepts the challenges of its operating environment and believes that the creation of a responsible health and safety culture in all its operations is integral to long-term success.

It is the ResourceCo policy to strive to minimise work health and safety risks in all its activities and take an active role in raising the health and safety awareness and responsibility of workers, visitors, suppliers, contractors and customers.

Applicability

This Policy applies to ResourceCo Holdings Pty Ltd ACN 107 343 288, the subsidiaries it controls (collectively, ResourceCo) and each of those entities' respective workers.

Policy Statement

For this Policy to be implemented ResourceCo will:

- Commit that no business objective or activity is more important than the health and safety of our employees, contractors and visitors;
- Provide a safe work environment for all staff, contractors and visitors.
- Recognise the required commitment to communicate and consult with all stakeholders on relevant health and safety matters.
- Continually develop, maintain, monitor and review our integrated management system to improve health and safety performance and outcomes.
- Continually identify, assess, control and review our safety and health risks
- Apply the principles of continuous improvement and best practice to health and safety performance through measurable objectives and targets.
- Promote health and safety awareness and engagement among all workers, suppliers, and customers.
- Actively engage and cooperate with relevant health and safety agencies.
- Conduct regular reviews of conformance to requirements and achievement of objectives at Board level.
- Provide adequate resources to effectively implement this policy.

Further information

For further information, please contact a team member of the Policy Owner.

Appendix E – Environment Policy

POLICY

POL 03 – ENVIRONMENTAL POLICY

ResourceCo values all workers that contribute to the success of the business. Henceforth, the term "workers" will be used to define any employee, contractor or labour hire person who is 'working' for ResourceCo in some capacity.

Purpose

ResourceCo considers its impact on the environment to be of primary importance. ResourceCo is committed to the protection, conservation, and where possible, enhancement of the natural environment in which we operate, and protection of the broader environment community by the services and products it provides.

Applicability

This Policy applies to ResourceCo Holdings Pty Ltd ACN 107 343 288, the subsidiaries it controls (collectively, **ResourceCo**) and each of those entities' respective workers, and all subcontractors, customers, and visitors on all ResourceCo managed sites.

Policy Statement

ResourceCo is committed to the implementation of this policy with the objective of complying with all relevant legislation, continuing leadership in environment and sustainability performance in the waste and recycling industry, and ensuring its corporate objectives are met while improving environmental outcomes.

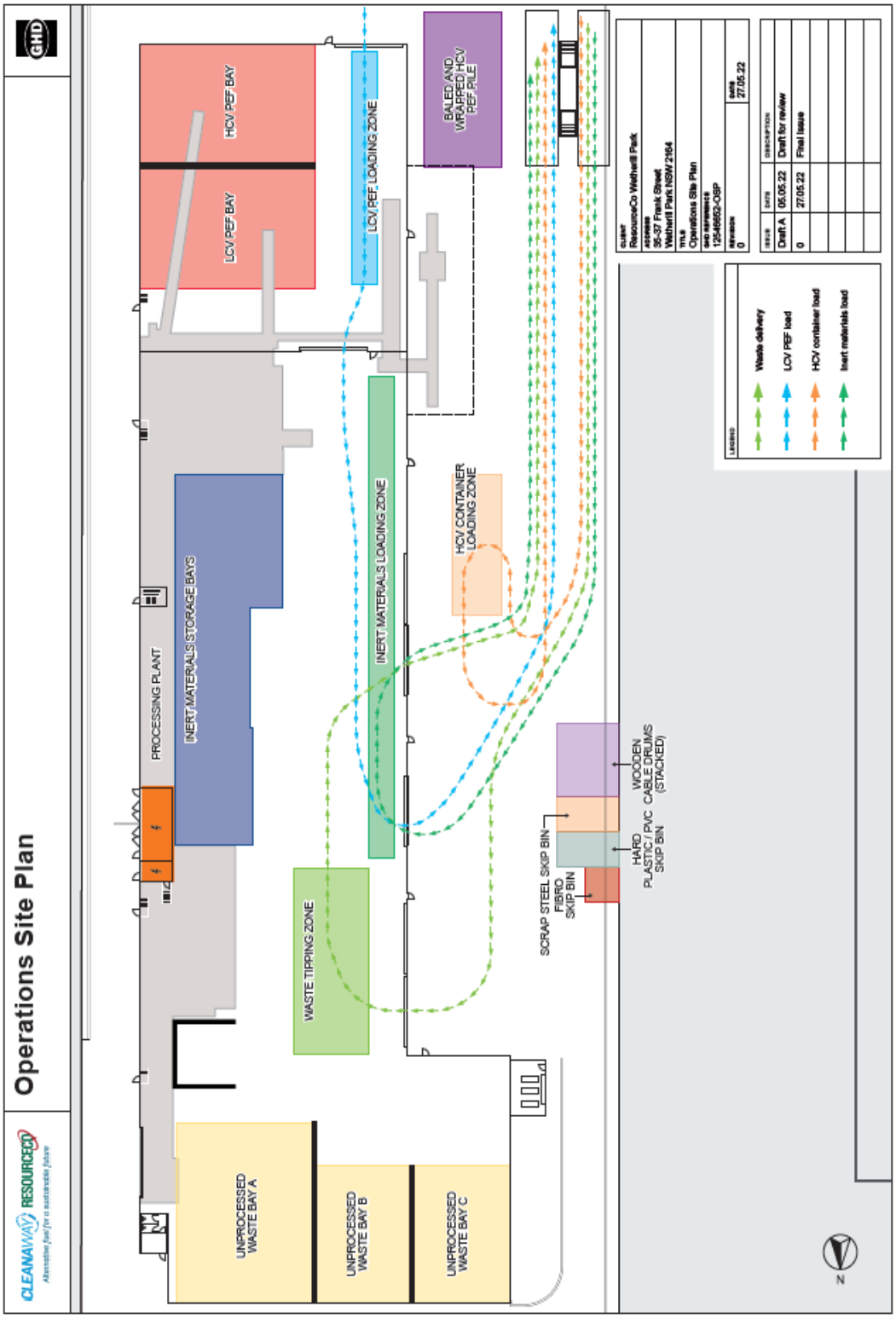
ResourceCo will ensure this policy is implemented by:

- Complying with all relevant environmental legislation, standards and regulatory guidance;
- Striving for continuous improvement of the environmental management system and environmental performance;
- Identifying all activities which have the potential to cause environmental harm and implement controls to manage them in accordance with the ResourceCo risk management framework;
- Committing to a proactive approach to pollution prevention and the protection of air, land, water, amenity, flora and fauna, by ensuring effective maintenance, management, and monitoring practices are in place;
- Identifying potential environmental impacts across the lifecycle of our products and services;
- Implementing specific, time-bound and achievable environmental objectives to improve environmental and sustainability performance; and
- Promoting environmentally sustainable practices within our business and advocating sustainably sound practices to the public, industry groups and customers.

Further information

For further information, please contact a team member of the Policy Owner.

Appendix F – Site layout



Appendix G – Incoming waste customer pre-qualification procedure (CR-PR225)

14. CR-PR225 - INCOMING WASTE CUSTOMER PRE-QUALIFICATION

Purpose

The purpose of this procedure is to ensure that only those new customers with allowable waste materials are accepted by Cleanaway ResourceCo's Wetherill Park RRF (CRRRF). Through this process, it must be identified which NSW EfW Policy Resource Recovery Criteria their waste will fit into. It must be ensured that new customers understand the conditions by which CRRRF will accept their allowable waste streams

Scope

This procedure is to be used when assessing all new potential incoming waste customers for CRRRF.

References

NSW Energy from Waste Policy Statement (June 2021)
NSW EPA Eligible Waste Fuel Guidelines (December 2016)

Definitions

C&I	Commercial and Industrial Waste
C&D	Construction and Demolition Waste
EfW	Energy from Waste
RRF	Resource Recovery Facility

Assessment

1. The potential customer will be assessed against a set of criteria to determine the following:
    a. Appropriately licensed EPA waste facility
    b. Commitment to WHS
    c. Control measures are in place for the control of Hazardous Waste Materials, to ensure that Hazardous waste materials are not delivered to CRRRF
2. The potential customer's waste will be assessed to determine whether it is:
    a. Currently being sent to landfill, or
    b. Currently being sent to a competitive resource recovery facility, and if it wasn't sent to this facility, would it be sent to landfill, or
3. The potential customer's waste will be assessed against a set of criteria to determine the following:
    a. Are there any materials in the potential customer's waste stream that the facility is either not licensed to accept or do not meet the facility's limit as listed in Tables 1 and 2. If yes, then the potential customer will not be allowed to deliver waste to the facility
    b. Which NSW EfW Policy Resource Recovery Criteria the waste will fit into. The allowable criteria for the facility are listed in Table 3.

   c. The estimated volumes of waste materials for each NSW EfW Policy Resource Recovery Criteria

4. The potential customer's waste will be assessed against a set of criteria to determine the following:
   a. Calorific value
   b. Levels of inert material
   c. Moisture
5. The completed Incoming Waste Pre-Qualification Form (FORM 49) is to then be submitted to the General Manager who will make the ultimate decision as to whether the waste can be accepted to the facility, and if so which Resource Recovery Criteria the waste fits into

Criteria to Determine Waste Material Acceptability

At the highest level of waste definition, the facility can accept the following:

- Dry Mixed Commercial and Industrial waste materials
- Dry Mixed Construction and Demolition waste materials
- Source separated Waste

In terms of the general characteristics of the waste materials being sought they are as follows:

- Solid
- Dry
- Non-putrescible
- Non-hazardous
- High calorific value
- Low levels of inert material
- Able to meet the NSW EfW Policy's Resource Recovery Criteria

In terms of the specific constituent materials in these waste categories, the following tables outline the degrees of acceptability of various waste materials for CRRRF

Table 1: Unacceptable Waste Materials

Unacceptable Waste Material	Details
Asbestos	Zero allowance
Liquid wastes	Zero allowance
Listed wastes	Zero allowance
Chemical wastes	Zero allowance
Medical wastes	Zero allowance
Contaminated soils	Zero allowance
Municipal Solid Waste (MSW)	Zero allowance
Explosives	Zero allowance
Poisons	Zero allowance
Radioactive wastes	Zero allowance
Pharmaceutical wastes	Zero allowance
Food wastes	Zero targeted, <5% allowable in a mixed load
Green wastes	Zero targeted, <5% allowable in a mixed load
Electronic wastes	Zero targeted, <1% allowable in a mixed load
CCA preservative treated timber	<10% allowable in a mixed load
PVC Plastics	<1% allowable in a mixed load

Table 2 specifies materials which will be accepted but are unable to be processed, and therefore will incur additional fees for handling and/or disposing of to a licensed receival facility.

Table 2: Non-Processable Waste Materials

Unacceptable Waste Material	Details
End of life tyres	Sent off site to a tyre recycler
Car batteries	Sent off site to a battery recycler
Mattresses	Sent off site to a mattress recycler
Gas cylinders	Sent off site to a gas cylinder recycler

NSW EfW Policy's Resource Recovery Criteria

It is important to ensure that the waste materials being delivered to materials CRRRF are appropriately categorized from the NSW EfW Policy Resource Recovery Criteria. This is because CRRRF must comply with the limits of PEF able to be manufactured from these various criteria of waste streams.

Table 3: Non-Processable Waste Materials

Waste Stream	Processing Facility	% Residual Waste Permitted for Energy Recovery
Mixed commercial and industrial waste (C&I)	Facility processing mixed C&I waste	50%
Mixed commercial and industrial waste (C&I)	Facility processing mixed C&I waste where a business has separate collection systems for all relevant waste streams	100%(1)
Mixed construction and demolition waste (C&D) waste	Facility processing mixed C&D waste	25%
Source separated waste		100%(2)

(1) NSW EPA is required to approve any waste streams that request this classification

(2) Source separated waste streams are sourced directly from the waste generator. These streams that fall within the CRRRF acceptance criteria can include residual waste wood, residual textiles, end of life tyres

Note: Completed Incoming Waste Pre-Qualification Forms (FORM 49) are to be collected and stored in accordance with CRRRF's quality management system. FORM 49 records evidence of compliance to NSW EfW Policy and evidence that incoming waste was previously going to landfill, and must be provided to the EPA on request, in the format requested by the EPA

Documentation

FORM 49 Incoming Waste Pre-Qualification Form

Appendix H – Waste Receival Inspection Officer Role Description

RESOURCECO
TOMORROW'S SOLUTIONS. TODAY

JOB ROLE DESCRIPTION

Role Title:	Waste Receival Inspection Officer	**Division:**	RRF
Site:	Wetherill Park	**Date:**	April 2017

Purpose of Position

- To control traffic movements of delivery vehicles, to ensure safe and efficient access and egress to the waste receival floor areas
- To receive, inspect and classify incoming raw materials
- HSEQ compliance

Reports to: Production Manager – Wetherill Park

Main Tasks and Responsibilities

1. **Raw Material Receival**
- To inspect and assist in classifying incoming loads as per classification requirements, including type and source of waste material
- To inspect incoming loads for non-complying materials, as per acceptance criteria, including identification of hazardous chemicals and dangerous goods
- To manage the re-distribution / disposal of non-compliant materials

2. **Traffic Control**
- To control traffic movements of delivery vehicles on site, as per Traffic Management Plan
- Ensure raw material is deposited within the designated waste receival areas
- Ensure manufacturing building is enclosed through the operation of roller access doors

3. **Customer Relationships**
- To develop and maintain strong relationships with internal and external customer's, and 3PL providers

4. **Other**
- Ensure accurate and timely information flow to the weighbridge
- Ensure records are maintained
- Ensure excellent housekeeping
- A professional and courteous approach to all personnel they interact with

Qualifications and Experience

- Strong interpersonal skills, communication skills
- Self-motivated, and have the ability to work autonomously and collaboratively
- Basic level computer skills
- Dangerous Goods Training
- Asbestos Awareness Training
- Work Zone Traffic Control

Appendix I – Asbestos Management Plan

ResourceCo RRF Pty Ltd

Asbestos Management Plan

Wetherill Park RRF

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Document Information

The following table contains administrative metadata.

Instructional material owner;	HSEQ Manager
Document ID:	CR-MP004
Review Date:	January 2025
Review Due:	January 2026

Version History

The following table details the published date and amendment details for this document.

Date Published	Version Detail	Reason for issue of amendments	Author or Document Owner (Program)
September 2023	1	Initial document	HSEQ
January 2025	2	Review following rebranding	Ben Whitehouse

Contents

- **Purpose:**

To outline the most effective way to respond to, and recover from, any incident involving Asbestos, or Asbestos containing materials (ACM), at the ResourceCo Resource Recovery Facility Wetherill Park, in accordance with legislative requirements.

- **Definition – Asbestos:**

Asbestos is a generic term given to several naturally occurring silicate minerals. The most common forms are Chrysotile (White), Crocidolite (Blue) and Amosite (Brown). Asbestos-Containing-Materials were used extensively in Australian buildings and structures, plant, and equipment, in ships, trains, and motor vehicles during the 1950s, 1960s and 1970s. Some uses, including some friction materials and gaskets, were only discontinued on 31 December 2003.

- **Scope:**

This management plan applies to all persons on the ResourceCo Wetherill Park Site, or any parties which may be affected by the operations of the facility in the event of an Asbestos related incident.

- **Objectives:**

The objective of this Asbestos / ACM Response plan is to provide information, guidance, and to outline ResourceCo's Responsibilities in relation to:

- Preventative measures undertaken to reduce the risk of as Asbestos related incident occurring on site.
- Identification of and monitoring for, Asbestos and Asbestos Containing Material.
- Control measures in place to mitigate and / or monitor Asbestos related risks in the workplace.
- The way in which Asbestos is handled and detailing the process undertaken to remove any contaminated material on site, relevant to each work area and the different protocols involved for each.
- Decontamination protocols and returning the Facility to an operational state.

- **References:**

Code of Practice: Managing the Risks of Asbestos in the Workplace *Protection of the Environment Operations (Waste) Regulation 2014*
EPA NSW: Standards for Managing Construction & Demolition Waste in NSW

- **Types of Asbestos:**

There are two key varieties of Asbestos, as defined by the NSW EPA:

- *Friable (non-bonded) Asbestos material*: Any material that contains asbestos and is in the form of a powder or can be crumbled, pulverized or reduced to powder by hand pressure when dry. All Friable Asbestos must be removed by a licensed Asbestos removalist, there is no amount that can be handled without having a class A Asbestos license.
- *Bonded asbestos material:* Any material (other than friable asbestos material) that contains asbestos. Up to 10m² of Bonded Asbestos can be removed with no license, and there are no limitations on Bonded Asbestos removal with a class B license.

- **Hazards of Asbestos:**

Whilst undisturbed, Asbestos poses little health risk. It is only when the material becomes disturbed (I.e. moved, broken, crushed etc) that individual Asbestos fibres are released. These fibres once airborne, can easily be inhaled, and become lodged in the lung tissue, leading to irreversible debilitating illness such as Mesothelioma, Lung Cancer, and Asbestosis.

Asbestos-Containing-Materials are not at all accepted at the facility, ResourceCo Resource Recovery Facility is licensed to accept up to 250 000 tonnes of a combination of: Construction and Demolition waste / residuals, and Commercial and Industrial waste / residuals each year. Although these waste types present the highest risk for Asbestos contamination the facility has strict waste acceptance criteria, and binding customer agreements, stating that ResourceCo is an ACM free site. It is only through a customer breach of these agreements that any ACM related incident may occur.

Given the processes that take place at ResourceCo Resource Recovery Facility, of which almost all involve serious disturbance of materials and large potential for dust generation, it can be understood the immense risk that is posed by the possibility of ACM entering the production process.

- **Preventative Measures:**
  - Pre-qualification process with potential new customers. Refer to PROC 28 Incoming Waste Customer Pre-Qualification Procedure. As well as thorough inspection of 'trial loads' by management to ensure the waste being brought to site aligns with the information disclosed by the customer.
  - Direct education with the customer base to ensure that only materials that are free of Asbestos are delivered, and asbestos will not be accepted.
  - Appropriate signage on site that clearly states Asbestos is not accepted at the facility.
  - The Weighbridge Operator is trained in Asbestos identification and performs a preliminary inspection of loads by means of an overhead camera at the Weighbridge. Any loads suspected to be contaminated will be turned around at the weighbridge and will not be allowed to progress to the Waste Receival area.
  - The Waste Receival Inspection Officer will be trained in Asbestos materials identification. All loads containing Construction and Demolition materials are to be tipped away from the Raw Feed Stockpile, spread to a thickness of 200mm, and thoroughly inspected for ACM before being combined with the Raw Feed Stockpile. If any material within a load being delivered is determined to be Asbestos, the entire load will not be accepted on site.

- **Control Measures:**

In conjunction with the preventative measures in place. There are a number of controls in place for managing the risks of ACM at the ResourceCo Resource Recovery Facility Wetherill Park, these include:

- *MicroPhazir Asbestos identification gun*: This allows near instantaneous determination of whether a material contains Asbestos or not. This takes the 'guesswork' out of the equation for Waste Receival Inspection Officers, and workers in the factory who may be faced with an Asbestos incident. This allows ACM to be quickly and accurately located, and dealt with appropriately, in line with the processes discussed in this document.
- *Asbestos awareness training*: Waste Inspection Receival Officers, Weighbridge Operators, Plant Controllers, along with a number of other key permanent personnel, will be Trained in Asbestos awareness, and identification of Asbestos.
- *General-purpose hoses*: Are located around site and can be used to wet down any potentially Asbestos containing material.
- *Asbestos kits*: There are Asbestos kits located at Waste Receival, and the Control Room. These kits contain dedicated Asbestos disposal bags, Polythene sheeting, Disposable coveralls (type 5, category 3), signage and barricading.
- *Dedicated Asbestos removal bin*: Located inside the Manufacturing facility is a large skip bin dedicated to the removal of possible ACM by an appropriately licensed external contractor. Once appropriately dealt with and sealed, ACM can be stored here with a low likelihood of being disturbed. The bin is collected on an as-needed basis.
- *Personal Protective Equipment*: Task-specific PPE including P2 Respirator, Safety Gloves, Disposable Coveralls, and Site-specific PPE including; Hard Hat, Safety Boots, Safety Glasses, Long sleeve Hi-Visibility Clothing

- **Monitoring for Presence of Asbestos:**

Despite the extensive preventative and control measures in place ResourceCo also conducts regular testing of manufactured products, and background air quality testing, for the presence of Asbestos fibres. This is a part of ResourceCo's commitment to the safety of all persons involved in operations either on / nearby site, through to the end-use, of both inert materials, and fuel products.

- Air monitoring: Background air monitoring is conducted on a quarterly basis across five locations inside the manufacturing facility. These locations are varied for each testing cycle to ensure an accurate representation of airborne Asbestos presence is determined; site wide.
- Testing Fuel: Each month, a composite sample is derived from the mixing of daily fuel samples and sent to an external laboratory for testing. Part of this analysis is comprised of testing for presence of Asbestos.
- Testing Inert Materials: Characterisation testing for all inert Aggregates and Fines is also conducted, at regular intervals, which involves testing for the presence of Asbestos

- **Health Monitoring:**

In addition to monitoring for the presence of Asbestos, regular health monitoring is also conducted for permanent employees of ResourceCo. This testing is conducted in line with POL 27-*Health Monitoring Policy* and contains a Spirometry component, which would identify any deterioration in respiratory function caused by exposure to airborne Asbestos fibres.

- **Handling of and Response to Asbestos Incidents:**

The way in which Asbestos or ACM are dealt with at ResourceCo, varies depending on the type and location of the material.

In the event that suspected Asbestos, or ACM is discovered the following protocols must be adhered to, for the process of identification of the material:

Step	Action
1	Potential piece of ACM to be tested using the MicroPhazir Asbestos Identification Gun. Following positive identification of ACM, load of material is to be rejected.
2	Production Manager, Shift Supervisor, and Plant Controller are to be notified.
3	Ensure that appropriate PPE is worn (Task specific PPE including P2 Respirator, Safety Gloves, Disposable Coveralls (if friable asbestos identified), and Site-specific PPE including Hard Hat, Safety Boots, Safety Glasses, Long sleeve Hi-Visibility Clothing) when handling the ACM.
4	The area is to be cleared, and the material to be wet down. This is to prevent the potential release of Asbestos fibres.
5	Failing step 1 above, an asbestos awareness trained worker shall identify the material and discern whether the material is Friable, or Bonded.

Note: If material cannot be defined as being either Bonded asbestos, or generic fibreboard, it is to be assumed as Asbestos containing material and treated appropriately.

- *Friable (non-bonded) Asbestos:*

There are no provisions at the ResourceCo Wetherill Park site for dealing with Friable Asbestos in any quantity. In the event that Friable Asbestos is discovered in any capacity:

- All operations are to cease, and the site is to be cleared of all personnel.
- The General Manager, or Production Manager is to contact either; a Class A licensed asbestos removalist, or Hygienist, which will remove all traces of the material and dispose of it at an appropriate facility.
- This applies to customer loads being delivered. In the case that Friable Asbestos is tipped onto the floor it cannot be reloaded by ResourceCo personnel and is subject to the same procedure detailed in above point.

- *Bonded Asbestos:*

If material is found to be Bonded Asbestos, waste inspection staff are to isolate and treat the material as per the following procedure:

Step	Action
1	Ensure that appropriate PPE is worn (Task specific PPE including P2 Respirator, Safety Gloves, and Site-specific PPE including hard hat, safety boots, safety glasses, long sleeve hi-visibility clothing). The entire load of waste is to be rejected.
2	The area is to be cleared, and the material to be consistently wet-down, to prevent the potential release of Asbestos fibres. Appropriate signage and barricading as found in the onsite Asbestos kits should be used to maintain the aforementioned clear area.
3	Depending on the physical size of the Asbestos or ACM, the material is to be contained in heavy-duty 200 µm (minimum thickness) Asbestos disposal bag or heavy-duty 200 µm (minimum thickness) polythene sheeting. *Note: Both polythene sheeting and Asbestos Bags must be double wrapped / bagged.*
4	All bags should be twisted shut and sealed with duct tape before being doubled over on itself and being taped again. Polythene sheeting should have tape run along the entire length of all overlaps.
5	All ACM is to be placed in the dedicated Asbestos removal bin, which is located inside the Manufacturing facility for transport to an EPA approved facility.

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- *Specifics – Weighbridge*

  - The initial inspection point for all loads is the weighbridge. The weighbridge is fitted with several overhead cameras which allow for inspection of a load from the top down.
  - If any ACM is found during the weighbridge inspection, the load is to be rejected and directed to tip at an appropriately licenced facility.
  - The details of the load should be recorded in the rejected loads register.

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- *Specifics - Waste Receival / Waste Stockpile*

  - In the event that a customer tips a load that is deemed to contain Bonded Asbestos, the entire load will be reloaded onto the truck for disposal at an appropriate facility at the customer's expense. Steps 3 and 4 do not apply in this circumstance.
  - If ACM is found in the Waste Stockpile, it is to be removed following the above procedure. A thorough visual inspection of the stockpile must be undertaken by Asbestos awareness trained personnel to ensure all ACM is removed.
  - If a load is found to be contaminated, or a portion of the Waste Stockpile is found to be contaminated and cannot be immediately removed. It must be wet down, moved to the designated 'Contaminated Materials Quarantine Area', and barricaded as per CR-SP033 Quarantining of Contaminated Materials until such point as it can be removed from site by the responsible delivering party. Alternatively, ResourceCo will dispose of the material at an appropriate facility and the responsible delivering party will be charged an appropriate fee.

- *Specifics – Picking Stations*

  - If suspected ACM is identified on a conveyor / in a Picking Shed, the Production Stop button should immediately be pressed in order to stop the production line.

- The Plant Controller, or Shift Supervisor should be notified immediately. Either they, or an Asbestos awareness trained person, will assess the situation in accordance with the above procedures, and deal with the situation accordingly.

- *Specifics – Processed Material Stockpile*

- If a suspected Asbestos or ACM is identified in a processed materials stockpile (I.e. fines, aggregates etc), the material is to be removed in accordance with the above procedures. However, in the event that the stockpile is contaminated, to the point at which it can no longer be dealt with by ResourceCo personnel, the entire stockpile will have to be removed and transported to an appropriate EPA approved facility for disposal.
- The General Manager, Production Manager, or authorised delegate is to organise transport by an appropriate vehicle in line with EPA legislation.
- The material is to be loaded out using the Material Handler and placed, not dropped, in the designated vehicle. The material should also be consistently wet down during this process. Both of these factors are to aid in minimizing the amount of potentially hazardous dust generated during the process.

- *Personal Decontamination:*

- After any incident in which personnel have had to deal with Asbestos or ACM it is crucial to the health and safety of the individual, and those around them, that they follow the correct decontamination procedure.

- Personal Decontamination should be conducted as follows:

- Step	- Action
- 1	Remove any visible asbestos dust/residue from protective clothing wiping down with damp cloths or wet wipes. *Warning: do not reuse or re-soak damp cloths.*
- 2	Place cloths / wipes into Asbestos disposal bags.
- 3	Take disposable coveralls off and place into Asbestos disposal bags (P2 Respiratory Protection must still be worn).
- 4	- Twist bag shut and seal with duct tape, double the end over and seal once again.
- 5	- Place inside another Asbestos disposal bag, and repeat step 4.
- 6	- Remove Respirator, place in Asbestos disposal bag, and repeat steps 4 and 5.

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- The above process reduces the likelihood of residual Asbestos fibres left on personnel from being proliferated from the worksite through to their offices, vehicles, and homes. In following the procedures outlined in this document in conjunction with utilising correct PPE, Asbestos related incidents should be able to be dealt with in a safe and effective manner.

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- **Resuming Operations:**

In order for operations to resume, there are a number of protocols which must take place:

- Once all suspected Asbestos or ACM has been adequately contained and removed, an Asbestos awareness trained person must thoroughly inspect the affected area. Only trained personnel are able to declare that the area is safe to return to operations.
- In the event that Friable Asbestos was identified, and subsequently removed, only a qualified Hygienist can determine that the site is safe to re-enter and resume operations.
- Any equipment that may can been isolated or altered during the incident, must be returned to serviceable condition before operations can begin.

- **Reporting:**
  - An incident report must be submitted in accordance with CR-FM019 – Incident Report.
  - Customers who bring Asbestos or ACM on to the ResourceCo Wetherill Park site intentionally, or consistently, may at the discretion of the General Manager:
    - Have their permission to tip revoked.
    - In severe cases may be reported to the EPA

Appendix J – CR-PR236 *Hazardous Materials Response Management plan(including Dangerous Goods and Sharps)*

PROC CR-PR236 – HAZARDOUS SUBSTANCES AND DANGEROUS GOODS.

1. Contents

Purpose

To outline aspects associated with the

- safe use, storage and handling of hazardous substances and dangerous goods onsite.
- transporting of hazardous substances and dangerous goods offsite.

This procedure applies to materials that meet the definition of a hazardous substance or a dangerous good.

Scope

This procedure applies to Cleanaway Resourceco.

Definitions
Hazardous Substances (HS)

Hazardous substances are those that, following worker exposure, can have an adverse effect on health. Examples of hazardous substances include poisons, substances that cause burns or skin and eye irritation, and substances that may cause cancer. Many hazardous substances are also classified as dangerous goods.

A substance is deemed to be a hazardous substance if it meets the classification criteria specified in the Approved Criteria for Classifying Hazardous Substances [NOHSC:1008(2004](Approved Criteria).

Dangerous Goods (DG)

Means any substance or article listed in the Australian Code for the Transportation of Dangerous Goods by Road or Rail (ADGC)

Emergency Information regarding the Dangerous Goods in transit

Information outlining procedures or processes to be taken in the event of an emergency involving dangerous goods while in transit, as described in the ADGC chapter 11.2.

Globally Harmonised System of Classification and Labelling of Chemicals (GHS)

The GHS is published by the United Nations and provides the basis for classifying a substance as a hazardous chemical.

The GHS includes criteria that have been agreed to globally and used to classify both substances and mixtures for.

- physical characteristics such as explosiveness, flammability.
- health hazards such as acute effects, carcinogenicity; and

The GHS is intended to address how labels and safety data sheets (SDS) should be used to convey information about their hazards and how to protect people from this effect.

Safety Data Sheet (SDS)

A document that provides health & safety information on substances.

Hazardous Substances and Dangerous Goods Register

Is a register of hazardous substances/dangerous goods that are used by employees at the workplace. A copy of the SDS of hazardous substances, dangerous goods, and references to Risk Assessments of hazardous substance and dangerous goods is available on site.

Manifest

A written summary/electronic database/inventory of the hazardous chemicals & dangerous goods used, handled, or stored at a workplace. For harmonised states this is applicable where the quantity or a schedule 11 hazardous chemical/s exceeds the manifest quantity listed in Schedule 11.

a Manifest quantity Workplace must be used.

1 Hazardous Chemicals in Flood Overlay

The approved development does not permit the storage or handling of hazardous chemicals that exceed the hazardous chemicals flood hazard threshold quantities in Table 8.2.11.3.M and does not permit processes listed in Table 8.2.11.3.H of the Flood overlay code of City Plan 2014 v.20.

Transport Documentation

Information outlining the types, quantities and emergency information of the dangerous goods being transported, as described in the ADGC Chapter 11.1

Limited Quantities – (Regulation 1.2.9) Dangerous goods are packed in limited quantities if:

the goods are packed in accordance with Chapter 3.4 of the ADGC; and

the quantity of dangerous goods in each inner packaging does not exceed the quantity specified in or referenced from column (7) of the Dangerous Goods List for those goods.

Concessional Limited Quantities

Requirements provide a simplified approach to transport documentation for limited quantities that are generally used for household and personal care purposes.

Skytrust

Online database that ResourceCo can access to retrieve safety related information.

Procedure

Hazardous Substances and Dangerous Goods General Use Requirements

Hazardous substances and dangerous goods will only be used where there is no alternative to lower risk.

The Health Safety and Environment Manager obtains current SDS from the Manufacturer/Supplier via a commercial provider of SDS.

The Site HSEQ Manager will facilitate the process so that a risk assessment is completed based on the information contained in the SDS. This assessment will include a review of the controls listed in the SDS and operational assessments.

The Health Safety and Environment Manager in conjunction with the Team Members using the Substances will undertake risk assessments based on the information contained in the SDS. The SDS will be made available to team members through the Maintenance department.

The Site HSEQ Manager will, using the Risk Management process, facilitate the process so that a control plan is formulated, and details recorded in the Cleanaway Resourceco Risk Register.

The Site HSEQ Manager will arrange for the trial(s) of new substances prior to team members use. Refer - Pre-Purchase, Lease or Hire HSEQ Evaluation Procedure.

The Site HSEQ Manager facilitates the development of Work Instructions, as required, in line with identified controls in the Risk Assessment.

The Dangerous Goods assessment will include an assessment of the quantities of Dangerous Goods for each site.

The Site HSEQ Manager monitors the currency of documents and registers (e.g. Risk Assessments, Hard Copy SDS sheets) relating to the hazardous substances and dangerous goods used on the site.

Hazardous Substances and Dangerous Goods Register

The business will have access to SDS's accessible via Skytrust.

The site Hazardous Substances and Dangerous Goods Register, manifest and SDS Folder must be made readily available either in Hardcopy or e-copy.

The site Hazardous Substances and Dangerous Goods Register, manifest and SDS Folder must be available to emergency services personnel in the event of an emergency at the Cleanaway Resourceco.

Consultation

Resourceco management and employee representatives will be involved in a consultative process in the identification, assessment, control and review of hazardous substances and dangerous goods.

Storage, Placarding and Handling of Dangerous Goods Onsite.

Chemicals and fuels in containers of greater than 15 litres must be stored within a secondary containment system.

2

The Maintenance Manager oversees that appropriate storage locations are provided for each class/type of hazardous substances/dangerous goods in reference to manufacturer's recommendations, SDS and label information, and take into account, Ignition sources, Fire Protection, Containment of spills, Segregation requirements.

No hazardous substances or dangerous goods are to be transported between workplaces or anywhere else by unauthorised carriers (this includes company cars).

The Site HSEQ Manager will notify the regulator in writing, should the quantity of HS/DG's used, handled, or stored in the workplace exceed the manifest quantity, significantly change, or no longer be used. Display a placard where the quantity of hazardous substances and dangerous goods (or a group of HS/DG) used, handled, stored and/or transported at a workplace exceeds the legislated quantities. Placarding and Manifest Requirements)

Containment system.

3 Notification to Regulator

Under section 11 of the WHS Regulation, a person conducting a business or undertaking must submit a notification to Dept of Workplace Health and Safety for a Manifest Quantity Workplace (MQW). This notification requires a copy of the manifest and site plan to be included with the notification. Form 11 – Notification of manifest quantity workplace.

Emergency Plans, Spills & Disposal

Cleanaway Resourceco Emergency Plans will take account of any risks arising from the use and storage of hazardous substances and dangerous goods at the workplace. Content of the Cleanaway Resourceco Emergency Plan will include liaison with the relevant Legislative Authorities and Emergency Services in the event of an emergency. If a hazardous substance or dangerous goods spillage occurs, wherever possible Cleanaway Resourcecos are to prevent spillage from entering drains, waterways, or the environment.

The Health Safety and Environment Manager is to be contacted immediately after the spillage has been contained.

Site Managers are to oversee cleanup and disposal of hazardous substances/dangerous goods is in accordance with the following requirements where applicable, at their sites:

- Risk Assessment Outcomes
- State Authorities Requirements
- Safety Data Sheet
- Waste Management Plan
- Spillage procedures
- Appropriate PPE is made available and worn.

Transporting of Dangerous Goods Off-Site by road or rail

All dangerous goods loads are to meet the requirements of ADGC, this includes packaging, marking, and labelling.

Vehicles and/or containers need to be checked to see that they are fit for carrying dangerous goods prior to loading.

Transport Providers are responsible for Vehicle drivers to placard loads, prior to leaving the loading site where the quantity of dangerous goods (or a group of DGS) being transported requires it. It is a requirement that the placard is correct for the load, without false or misleading information. This requirement does not include placarding loads that don't require it.

For Concessional Limited Quantities a placard is required for dangerous goods loads equal to or greater than 2 tonnes (2000 L).

Despatch team members shall confirm that the placards are in place when the load is dispatched from a ResourceCo site. It is a requirement that the placard is correct for the load, without false or misleading information. This includes placarding loads that don't require it.

The Dangerous Goods Transport Document may be in any form, provided it contains all the information required in Part 11 of this ADGC. All Transport Documentation is to:

List the dangerous goods first, if carried with non-dangerous goods.

Be consecutively numbered if of more than one page.

Be written in English, easy to identify, legible and durable.

Be carried in the vehicle in hard copy form.

Description of dangerous goods, including quality, to be transported.

Have Emergency Information for each of the dangerous goods carried.

For Concessional Limited Quantities, the Transport Documentation (only meets road requirements) must be correctly completed with all relevant details by Team Members for the following:

consignor details.

- consignee details.
- date.
- quantity of all Classes, Divisions and specific substances listed on the Concessional Limited Quantities Transport Document included on the load.
- presence or absence of food; and
- certification of the compliance of the load to the ADG Code.

Information in the transport documentation must not be known to be false or misleading.

The Site Manager shall ensure that correct transport documentation is provided with each load.

For inbound primary freight loads, the transport provider's dangerous goods processes are reviewed annually as per contractual arrangements.

Training

The HSEQ Manager is to provide a process by which Hazardous Substances / Dangerous Goods training is included in training programs for team members who use, handle store or dispatch Hazardous Substances/Dangerous Goods.

The training will include:

- Correct use, storage & handling of Hazardous Substances/Dangerous Goods
- Correct use, fit and maintenance of PPE and clothing. PPE must be supplied in accordance with the PPE matrix–
- Information on labelling and SDS sheets.
- Emergency control and spill response.

Transporting Dangerous Goods including Concessional Limited Quantities Loads

The HSEQ Manager will include Hazardous Substances/Dangerous Goods training in training programs for Supervisors and Managers.

Work Instructions will include Hazardous Substances/Dangerous Goods training as required.

Review

The Site HSEQ Manager will facilitate regular review of the Hazardous Substances and Dangerous Goods Register to ascertain.

- Currency of listed substances.
- Currency of SDS.
- Currency of risk assessments.
- Currency and adequacy of controls

Further information

For further information, please contact a team member of the Procedure Owner

Appendix K – Energy from Waste Management Plan

ResourceCo RRF Pty Ltd

Energy from Waste Management Plan

Wetherill Park RRF

January 2025

15. Document Information

The following table contains administrative metadata.

Instructional material owner;	HSEQ Manager
Document ID:	CR-MP002
Review Date:	January 2026

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The following table details the published date and amendment details for this document.

Date Published	Version Detail	Reason for issue of amendments	Author or Document Owner (Program)
09 March 2018	Version 6	Approval by DPE 17/03/2018	GHD
May 2023	Version 7	Update after IEA and OEMP audit. Update site data.	Gary Salway
Jan 2025	Version 8	Update following rebrand to ResourceCo	Ben Whitehouse

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Appendix F – Test Methods

Appendix G – Layers of Control

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
C&D	Construction and demolition
Construction and Demolition Waste	Waste arising from commercial or industrial premises, refurbishments and demolition and construction work
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
EPA	Environment Protection Authority
EPL	Environment Protection Licence issued by the EPA under the POEO Act
Load	the quantity of waste material delivered to the stockpile by truck, bin, or trailer
Minister	Minister for Planning (or delegate)
NATA	National Association of Testing Authorities
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
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
Waste	As defined in the POEO Act and includes any materials receive or processed on the site

16. Introduction

16.1 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 Energy from Waste Management Plan (EfWMP) is one of a suite of plans that governs the operation of the facility.

16.2 Purpose

This EfWMP has been developed to address and manage the compliance with the NSW 'Energy from Waste Policy'. The key principles of the EfWMP are to provide:

- Details of how the receipt of incoming waste (feedstock) from waste processing facilities or collection systems complies with the resource recovery criteria specified in Table 1 of the EPA's 'Energy from Waste Policy Statement' for each waste stream.
- Details of how ResourceCo will compile and calculate percentages of incoming waste streams every three months and retain this information for submission to the EPA on request
- A procedure for providing evidence to the EPA that incoming material was previously going to landfill
- A procedure for the management of out of specification PEF
- A requirement that out of specification PEF materials would not be reprocessed until further analysis demonstrates that it meets the relevant criteria.
- Define calibration procedures and operating thresholds for the online analyser that will be used to measure real-time chlorine, calorific value and moisture content of the PEF

The EfWMP provides an overall framework for adherence to the NSW 'Energy from Waste Policy' during operation. It has been developed to satisfy the requirements of:

- Condition B8 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.

16.3 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 42 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

16.4 Environmental management system

16.4.1 ResourceCo corporate EMS

This EfWMP 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.

16.4.2 Wetherill Park Resource Recovery Facility OEMP

This EfWMP is a sub-plan to the Wetherill Park Resource Recovery Facility Operational Environmental Management Plan (OEMP). The OEMP is based on the ISO14001 Environmental Management System, which provides for continual improvement in environmental performance.

The OEMP is intended as an over-arching environmental management document that forms the basis for development of detailed sub plans (such as this) and procedures for managing specific environmental aspects and impacts. It 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 this document within the OEMP document framework is illustrated in Figure 1.

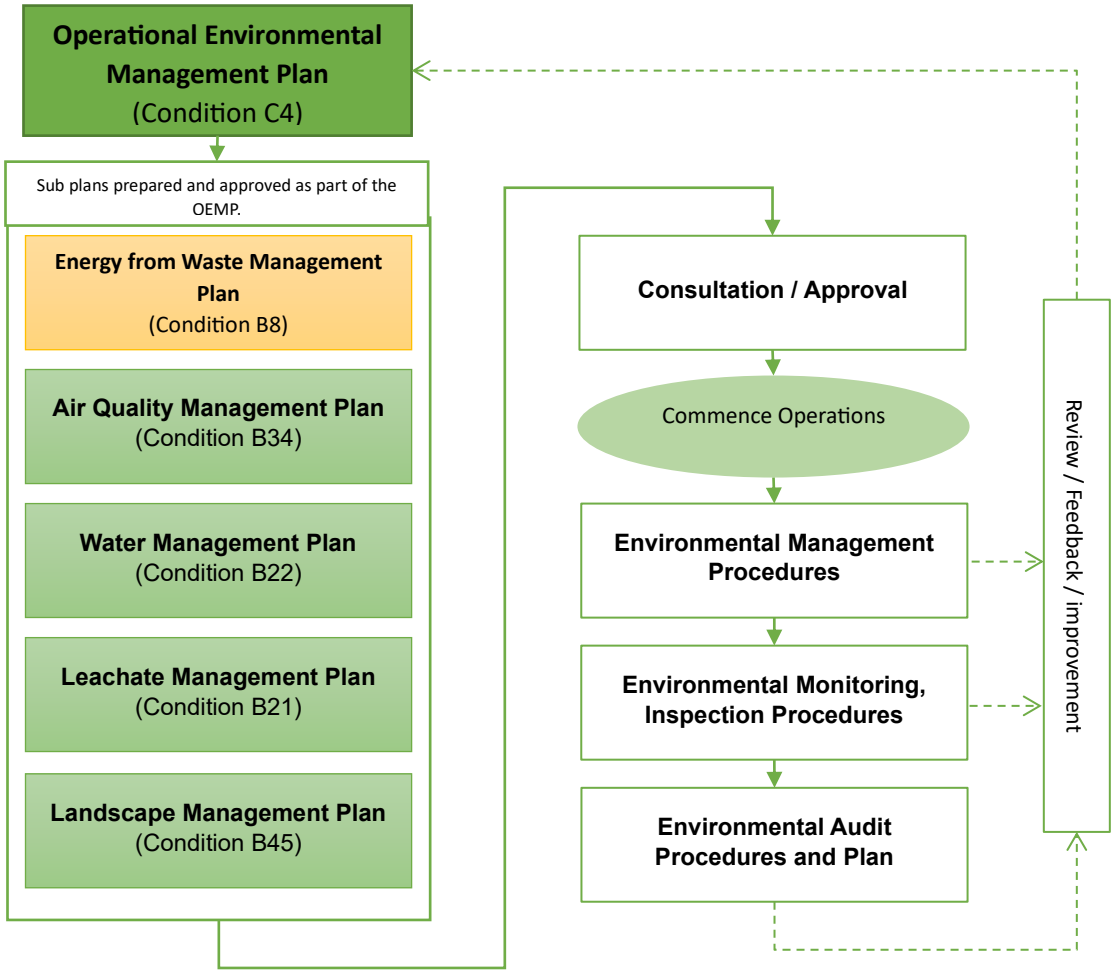

Figure 3 Operational environmental management document structure

16.4.3 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 (including this plan) 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.

16.4.4 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 EfWMP 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.

16.5 Consultation and approval process

16.5.1 EfWMP compliance with the Conditions of Approval

Table 2 lists the key requirements of Condition B8 and indicates where these requirements are addressed within this EfWMP or other documents.

Table 6 Conditions of Approval requirements

Condition requirements	Response/reference
Condition B8	
Prior to the commencement of operations, the Applicant must prepare an Energy from waste Management Plan (EfWMP). The EfWMP must:	
(a) be prepared in consultation with the EPA and to the satisfaction of the Secretary	Section 16.5.2
(b) detail the procedures to ensure full and ongoing compliance with the NSW *Energy from Waste Policy*, including:	
(i) details of how the receipt of incoming waste (feedstock) from waste processing facilities or collection systems complies with the resource recovery criteria specified in Table 1 of the EPA's 'Energy from Waste Policy Statement' for each waste stream	Section 18
(ii) details of how ResourceCo will compile and calculate percentages of incoming waste streams every three months and retain this information for submission to the EPA on request	Section 19
(iii) a procedure for providing evidence to the EPA that incoming material was previously going to landfill	PROC 28 (refer □)
(iv) a procedure for the management of out of specification PEF	Section 23
(v) a requirement that out of specification PEF materials would not be reprocessed until further analysis demonstrates that it meets the relevant criteria	Section 23.2
(c) define calibration procedures and operating thresholds for he online analyser that will be used to measure real-time chlorine, calorific value, and moisture content of the PEF.	PROC 34 (refer □)

16.5.2 Consultation and approval

In accordance with Condition B8, this EfWMP is required to be prepared in consultation with the EPA and to the satisfaction of the Secretary of the Department of Planning and Environment.

A draft version of this document was sent to the NSW EPA for review and comment. Issues raised by NSW EPA have been addressed in the revised version of this document and documented in correspondence shown in Appendix H.

17. Energy from Waste Policy Statement requirements

Table 7 shows the resource recovery criteria for energy recovery facilities as a direct extract from Table 4 of the *NSW Energy from Waste Policy Statement*. The *NSW Energy from Waste Policy Statement* states that energy recovery facilities may only receive feedstock from waste processing facilities or collection systems that meet the criteria outlined in this table.

Table 7 Resource recovery criteria for energy recovery facilities

Mixed waste stream	Processing facility	% residual waste allowed for energy recovery
Mixed municipal waste (MSW)	Facility processing mixed MSW waste where a council has separate collection systems for dry recyclables and food and garden waste	No limit by weight of the waste stream received at a processing facility
	Facility processing mixed MSW waste where a council has separate collection systems for dry recyclables and garden waste	Up to 40% by weight of the waste stream received at a processing facility
	Facility processing mixed MSW waste where a council has a separate collection system for dry recyclables	Up to 25% by weight of the waste stream received at a processing facility
Mixed commercial and industrial waste (C&I)	Facility processing mixed C&I waste	Up to 50% by weight of the waste stream received at a processing facility
	Facility processing mixed C&I waste where a business has separate collection systems for all relevant waste streams	No limit by weight of the waste stream received at a processing facility
Mixed construction and demolition waste (C&D)	Facility processing mixed C&D waste	Up to 25% by weight of the waste stream received at a processing facility
Residuals from source-separated	**materials**	
Source-separated recyclables from MSW	Facility processing source-separated recyclables from MSW	Up to 10% by weight of the waste stream received at a processing facility
Source-separated Garden waste	Facility processing garden waste	Up to 5% by weight of the waste stream received at a processing facility

Source-separated food waste (or food and garden waste)	Facility processing source-separated food or source-separated food and garden waste	Up to 10% by weight of the waste stream received at a processing facility

Notes

The EPA may consider increases to the maximum allowable percentage of residuals from facilities receiving mixed municipal and commercial and industrial waste where a facility intends to use the biomass component from that process for energy recovery, rather than land application. The facility must be able to demonstrate they are using best available technologies for material recovery of that stream.

Waste streams proposed for energy recovery should not contain contaminants such as batteries, light bulbs or other electrical or hazardous wastes.

Bio-char or char materials produced from facilities using mixed waste streams will not be able to be considered for land application as a soil amendment or improvement agent.

The C&I 'no limit' category is likely to apply only to mixed waste collected from single generators of large volumes of waste (e.g. supermarkets) or precinct-based businesses (e.g. shopping centres). Proponents will need to demonstrate that each entity generating waste has effective and operating collection systems for all waste streams they generate that have reuse or recycling opportunities (e.g. paper/cardboard collection; organic collection; and residual waste collection). Proponents wishing to use the C&I 'no limit' category will need to contact the EPA to determine the eligibility of each entity.

Note: the "no limit mixed C&I" category cannot be used until approval is granted from the EPA.

18. Receipt of incoming waste (feedstock)

This section provides details of how the receipt of incoming waste (feedstock) from the waste processing facilities or collection systems will be managed to comply with the resource recovery criteria specified in Table 4 of the EPA's *NSW Energy from Waste Policy Statement* for each waste stream (as shown in Table 7).

18.1 Waste control

18.1.1 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 *Protection of the Environment Operations Act 1997* (POEO Act). Only wastes expressly permitted by the Environment Protection Licence (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 waste
- Source-separated recyclables from Facility processing mixed MSW waste where a council has separate collection systems for dry recyclables and food and garden waste

18.1.2 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.

18.1.3 Waste screening and acceptance

Pre-qualification

As outlined in Section 6.2.3 of the OEMP, all potential customers will be required to be pre-qualified before being allowed to bring waste to the facility in accordance with the Incoming Waste Customer Pre-Qualification Procedure (PROC 28). 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 PEF product 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
- Source Separated C&I

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 recover 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.

As outlined in Section 6.2.3 of the OEMP, 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 above). 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). Section 18.1.5 below 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.

18.1.4 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

18.1.5 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:

- Full-time traffic control/waste inspector on tipping floor at all times during operational hours
- 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 3.1.3) 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 of the OEMP 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 (PROC 204).

Sharps and medical waste

Sharps and medical waste identification training for all relevant staff on site. Refer to SOP 72 *Hazardous Chemicals – including Dangerous Goods and Sharps Procedure*.

Chemicals and oils

Hazardous Chemicals identification training for all relevant staff on site. Refer to SOP 72 Hazardous Chemicals – including *Dangerous Goods and Sharps Procedure*.

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.

19. Calculation of percentages

The following procedure will be implemented to calculate the PEF production target and demonstrate compliance with the *Energy from Waste Policy Statement* Resource Recovery Criteria:

Formula:

PEF % ≤ (100% x C&D recycling residuals) + (100% x C&I recycling residuals) + (100% x "no limit mixed C&I" waste) + (50% x"50% mixed C&I" waste) + (25% x mixed C&D waste)

Formula component details:

- All measures are by weight.
- The ResourceCo facility weighbridge is the point of measurement.
- Incoming waste stream volumes are measured when they enter the site over the weighbridge over the 3-month period
- PEF volume is measured when it leaves the site over the weighbridge over the 3-month period
- Incoming waste is classified into the following waste streams:
  - C&D recycling residuals
  - "No limit mixed C&I" waste from C&I sources
  - "50% mixed C&I" waste from C&I sources
  - C&D waste from C&D sources
- C&D recycling residuals will be from a facility which recycles mixed C&D waste and can produce a declaration stating that the residuals being sent to ResourceCo are less than 25% of the mixed C&D waste intake for the facility and that ResourceCo is the only offtake for their residuals for energy recovery purposes.
- "No limit C&I" will be those C&I waste sources which have been approved by the EPA as meeting the no limit criteria
- "50% mixed C&I" will be those C&I waste sources which do not meet the "no limit" criteria
- Mixed C&D will be raw mixed C&D waste that has not gone through a resource recovery process

The frequency of calculation will be 3 monthly (quarterly).

20. Records and reporting

20.1 Reporting

The weighbridge data including type, PEF category and amount of waste (in tonnes) received on the site and all material produced on site and transported off-site (as product or waste) will be recorded and retained.

20.2 Record keeping

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

Compiled calculations of percentages of incoming waste streams (as per Section 19) as well as Quarterly C&D recycling residuals declarations will be retained on site for the life of the facility and be kept readily available for submission to the EPA on request.

22. Review and improvement

22.1 Review of the Energy from Waste Management Plan

The EfWMP will be reviewed on a regular basis to ensure that it accurately reflects the ResourceCo EMS and conforms to applicable legislative and other requirements. The frequency of review will be at least annually as part of the OEMP review, or more frequently, as a result of a significant non-conformance or as directed by the Secretary of the Department of Planning and Environment or other authority.

At the conclusion of the review process, any recommendations for change, or improvement, to EMS will be reflected through amendments to the relevant system element including the OEMP, other 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 documentation will be recommended by the appropriate manager. The revised documents will be managed in accordance with ResourceCo's quality management system – including approval, document control and communication of changes to relevant staff.

Major documentation changes to the documentation 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 lists the types of amendments that would be considered minor and major, and the approval process.

Table 8 EfWMP 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	Hazardous materials removal
	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

22.2 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. Non-conformances shall be identified through verification processes aimed at ensuring

compliance with NSW Energy from Waste Policy Statement, in particular the resource recovery criteria, the OEMP and this EfWMP. 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. 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.

23. PEF quality management

23.1 Quality control

Quality control for PEF will comprise:

- Control of the wastes accepted into the facility, as described in Section 3 (and Section 6.2.3 of the OEMP), to minimise contaminants, and in particular PVC plastics through:
  - Pre-qualification of customers
  - Waste screening and acceptance processes including visual inspection.
- Development of PEF sampling and testing 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 analyser on the low PEF finished product output line.

Note: There are two distinct grades of PEF manufactured, namely Low CV PEF and High CV PEF, which have independent finished product output lines. The online analyser is installed on the Low CV PEF finished product output line only.

Customer Service Officer ton the weighbridge and the Waste Receival Inspection Officer are responsible for ensuring that the waste delivered meets the pre-approved criteria for acceptance.

PEF specification and test procedures will be determined in conjunction with each specific customer (typically cement kilns). Currently, the required specification and test procedures for PEF are summarised in □. The facility's PEF will be produced to meet these specifications. This will be achieved by:

- Inspection of the incoming waste by the Waste Receival Inspection Officer to ensure inappropriate items are taken out of the waste stream at the tipping floor and do not enter the production line
- Physical separation of incoming wastes with multiple magnets, screens, air separators and manual QC stations to ensure that the following materials do not go into the PEF product:
  - Aggregates such as concrete, rocks, bricks and other heavy inert materials
  - Metals

The physical testing regime, including specific test methods, is attached in □. The physical testing regime will be performed by a third party, Australian based NATA accredited laboratory.

The online PEF analyser will be designed to provide real time feedback on the major parameters of chlorine content (Cl), calorific value (CV) and moisture (H_2O). The real time feedback on key elements enables continual refinement of the process to help ensure that the key parameters remain within specification.

The online analyser calibration procedures and operating thresholds are provided in PROC 34 attached as □.

23.2 Management of out of specification PEF

The online analyser compares the real time measured values of the major parameters of chlorine content (Cl), calorific value (CV) and moisture (H_2O) against those detailed in Specification A in Appendix A, namely:

Chlorine (Cl)	≤ 0.2% m/m
Calorific Value (CV)	≥15%
Moisture (H_2O)	≤15% m/m

to determine if the PEF is out of specification.

The operating threshold range of the online analyser is detailed in (PROC 34 *On-line Analyser Calibration Procedure*)

Out of specification PEF is managed as per (PROC 40 *Managing Out of Specification Solid Recovered Fuel*).

23.3 Managing out of specification PEF – monthly combined composite sample

In the unlikely event that the monthly combined composite sample routine test returned an out of specification result on any of the parameters in the specification then ResourceCo will implement the following procedure:

1. ResourceCo will send the retained duplicate monthly combined composite routine sample to an independent NATA accredited laboratory for testing to all parameters specified in the specification.

If the test results of the retained duplicate monthly combined composite routine sample conform to specification, then:

1. No further action.

If the test results of the retained duplicate monthly combined composite routine sample verify the out of specification, then:

2. ResourceCo will conduct a root cause analysis to determine the source of the out of specification, utilizing information from:
    f. Customer pre-qualification processes.
    g. Waste Inspection processes.
    h. Routine testing.
    i. Trend analysis; and
    j. Any other relevant sources

    as detailed above.
3. ResourceCo will implement corrective and preventive actions to prevent a reoccurrence.
4. ResourceCo will increase routine testing until it is confirmed that the product is able to satisfactorily meet specification on an on-going basis.

24. References

Nexus Environmental Planning Pty Ltd (2016) Environmental Impact Statement titled ‘Waste and Resource Management Facility’ SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

Nexus Environmental Planning Pty Ltd (2016) Response to Submissions titled ‘Response to Submissions Waste and Resource Management Facility’ SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

NSW EPA (2015) ‘NSW Energy from Waste Policy Statement’

Appendices

- – PEF Specification and Test Procedures

The below table is typical is what is requested by ResourceCo's end users. These specifications are subject to change and non-conformances are punished by financial penalties.

Analyte	Specification A	Specification B	Test Procedure
Moisture	≤ 15%	≤ 15%	ISO 21660-3:2021Solid recovered fuels — Determination of moisture content using the oven dry method
Ash Content	≤ 15%	≤ 15%	ISO 21656:2021Solid recovered fuels — Determination of ash content
Calorific Value	≥ 15 MJ/kg	≥ 17 MJ/kg	ISO 21654:2021 Solid recovered fuels - Determination of calorific value
Chlorine Content	≤ 0.2%	≤ 0.8%	EN ISO 15408:2011 Solid Recovered Fuels - Methods for the Determination of Sulphur (S), Chlorine (Cl), Fluorine (F) and Bromine (Br) Content
Particle Size	≤ 50 mm in any direction ≥ 95% passing 35 mm	≤ 50 mm in any direction	EN 15415-1:2011 Solid recovered fuels - Determination of particle size distribution - Part 1: Screen method for small dimension particles
Biomass Content	As per customer specification	As per customer specification	EN ISO 21644:2021 Solid Recovered Fuels – Methods for the determination of biomass content

- – CR-PR225 – Incoming Waste Customer Pre-Qualification Procedure

25. CR-PR225 - INCOMING WASTE CUSTOMER PRE-QUALIFICATION

Purpose

The purpose of this procedure is to ensure that only those new customers with allowable waste materials are accepted by Cleanaway ResourceCo's Wetherill Park RRF (CRRRF). Through this process, it must be identified which NSW EfW Policy Resource Recovery Criteria their waste will fit into. It must be ensured that new customers understand the conditions by which CRRRF will accept their allowable waste streams

Scope

This procedure is to be used when assessing all new potential incoming waste customers for CRRRF.

References

NSW Energy from Waste Policy Statement (June 2021)
NSW EPA Eligible Waste Fuel Guidelines (December 2016)

Definitions

C&I	Commercial and Industrial Waste
C&D	Construction and Demolition Waste
EfW	Energy from Waste
RRF	Resource Recovery Facility

Assessment

6. The potential customer will be assessed against a set of criteria to determine the following:
    a. Appropriately licensed EPA waste facility
    b. Commitment to WHS
    c. Control measures are in place for the control of Hazardous Waste Materials, to ensure that Hazardous waste materials are not delivered to CRRRF
7. The potential customer's waste will be assessed to determine whether it is:
    a. Currently being sent to landfill, or
    b. Currently being sent to a competitive resource recovery facility, and if it wasn't sent to this facility, would it be sent to landfill, or
8. The potential customer's waste will be assessed against a set of criteria to determine the following:
    a. Are there any materials in the potential customer's waste stream that the facility is either not licensed to accept or do not meet the facility's limit as listed in Tables 1 and 2. If yes, then the potential customer will not be allowed to deliver waste to the facility
    b. Which NSW EfW Policy Resource Recovery Criteria the waste will fit into. The allowable criteria for the facility are listed in Table 3.
    c. The estimated volumes of waste materials for each NSW EfW Policy Resource Recovery Criteria

9. The potential customer's waste will be assessed against a set of criteria to determine the following:
    a. Calorific value
    b. Levels of inert material
    c. Moisture
10. The completed Incoming Waste Pre-Qualification Form (FORM 49) is to then be submitted to the General Manager who will make the ultimate decision as to whether the waste can be accepted to the facility, and if so which Resource Recovery Criteria the waste fits into

Criteria to Determine Waste Material Acceptability

At the highest level of waste definition, the facility can accept the following:

- Dry Mixed Commercial and Industrial waste materials
- Dry Mixed Construction and Demolition waste materials
- Source separated Waste

In terms of the general characteristics of the waste materials being sought they are as follows:

- Solid
- Dry
- Non-putrescible
- Non-hazardous
- High calorific value
- Low levels of inert material
- Able to meet the NSW EfW Policy's Resource Recovery Criteria

In terms of the specific constituent materials in these waste categories, the following tables outline the degrees of acceptability of various waste materials for CRRRF

Table 1: Unacceptable Waste Materials

Unacceptable Waste Material	Details
Asbestos	Zero allowance
Liquid wastes	Zero allowance
Listed wastes	Zero allowance
Chemical wastes	Zero allowance
Medical wastes	Zero allowance
Contaminated soils	Zero allowance
Municipal Solid Waste (MSW)	Zero allowance
Explosives	Zero allowance
Poisons	Zero allowance
Radioactive wastes	Zero allowance
Pharmaceutical wastes	Zero allowance
Food wastes	Zero targeted, <5% allowable in a mixed load
Green wastes	Zero targeted, <5% allowable in a mixed load
Electronic wastes	Zero targeted, <1% allowable in a mixed load
CCA preservative treated timber	<10% allowable in a mixed load
PVC Plastics	<1% allowable in a mixed load

Table 2 specifies materials which will be accepted but are unable to be processed, and therefore will incur additional fees for handling and/or disposing of to a licensed receival facility.

Table 2: Non-Processable Waste Materials

Unacceptable Waste Material	Details
End of life tyres	Sent off site to a tyre recycler
Car batteries	Sent off site to a battery recycler
Mattresses	Sent off site to a mattress recycler
Gas cylinders	Sent off site to a gas cylinder recycler

NSW EfW Policy's Resource Recovery Criteria

It is important to ensure that the waste materials being delivered to materials CRRRF are appropriately categorized from the NSW EfW Policy Resource Recovery Criteria. This is because CRRRF must comply with the limits of PEF able to be manufactured from these various criteria of waste streams.

Table 3: Non-Processable Waste Materials

Waste Stream	Processing Facility	% Residual Waste Permitted for Energy Recovery
Mixed commercial and industrial waste (C&I)	Facility processing mixed C&I waste	50%
Mixed commercial and industrial waste (C&I)	Facility processing mixed C&I waste where a business has separate collection systems for all relevant waste streams	100%(1)
Mixed construction and demolition waste (C&D) waste	Facility processing mixed C&D waste	25%
Source separated waste		100%(2)

(3) NSW EPA is required to approve any waste streams that request this classification

(4) Source separated waste streams are sourced directly from the waste generator. These streams that fall within the CRRRF acceptance criteria can include residual waste wood, residual textiles, end of life tyres

Note: Completed Incoming Waste Pre-Qualification Forms (FORM 49) are to be collected and stored in accordance with CRRRF's quality management system. FORM 49 records evidence of compliance to NSW EfW Policy and evidence that incoming waste was previously going to landfill, and must be provided to the EPA on request, in the format requested by the EPA

Documentation

FORM 49 Incoming Waste Pre-Qualification Form

- – CR-PR216 Online Analyser Calibration Procedure

26. CR-PR216 - ON-LINE ANALYSER CALIBRATION

Purpose

The purpose of this procedure is to describe the calibration methodology for the proposed on-line analyser that will be used to measure chlorine, calorific value and moisture content of the finished Processed Biomass Fuel (PBF).

Scope

This procedure is to be used for calibration of the on-line analyser for the measurement of chlorine, calorific value and moisture at Cleanaway ResourceCo's Wetherill Park Resource Recovery Facility (CRRRF).

References

I.S. EN 15442:2011	Solid Recovered Fuels – Methods for Sampling
SOP 2130	Routine PEF Sampling
SOP 2108	Daily Sample Preparation

Definitions

CRRRF	Cleanaway ResourceCo Resource Recovery Facility
PEF	Processed Engineered Fuel

Introduction

The proposed analyser that will be used to measure chlorine, calorific value and moisture content of the finished Processed Biomass Fuel (PBF) is:

Tomra AUTOSORT[NIR1-NIR2][H-600][X-L]

Background

With the Tomra AUTOSORT for PBF online analysis, it is possible to continuously determine quality parameters for final product. The TOMRA Online analyser continuously scans the surface of the product on the conveyor underneath the scanner. Near-infrared sensors detect the chlorine and water content – as well as the calorific value. The DUOLINE® scanning technology automatically detects the materials contact-free during the production process.

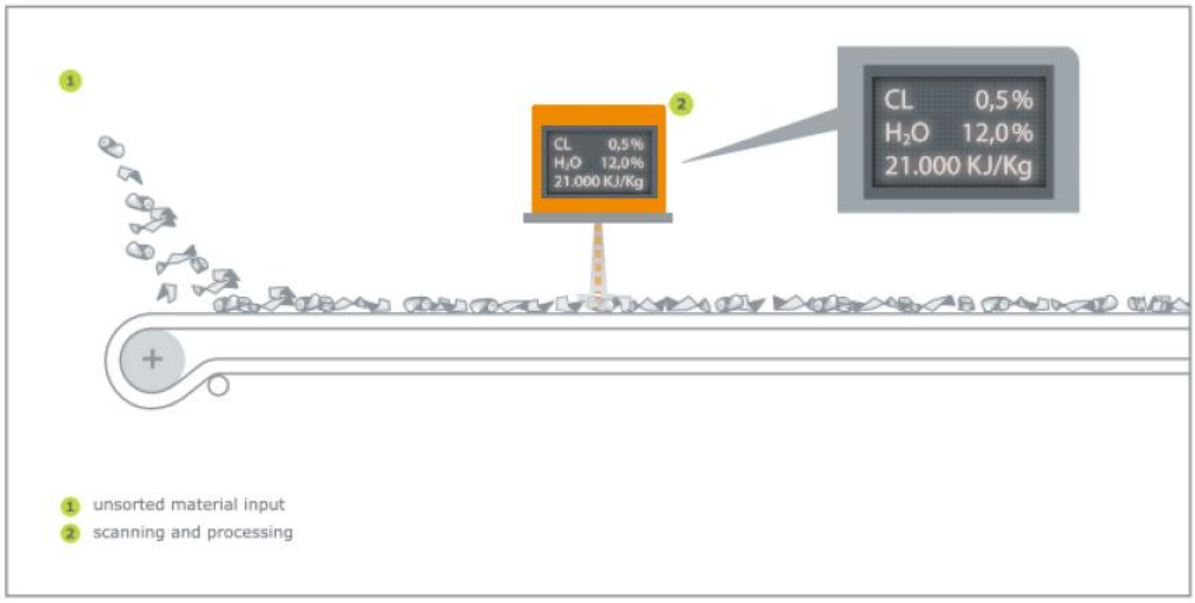

Figure 4 - Functional Principle of a Typical On-Line Analyser

Operating Thresholds

The operating thresholds of the TOMRA Online analyser will be commensurate to the finished PBF specifications. The proposed thresholds are:

Parameter	Threshold Range
Chlorine w/w	0.05% - 1.50%
Calorific Value (MJ/kg)	5 - 40
Moisture w/w	5% - 40%

Calibration

The AUTOSORT analyser includes Tomra's unique FLYING BEAM® technology which performs a self-calibration with every scan. Parameterization of the estimated chlorine, moisture content and calorific value must be adapted to the finished PEF stream through comparison of the AUTOSORT measured values against laboratory samples for the same time period.

Chlorine

Adaptation – measurement of chlorine content in the range of 0.05% - 1.50 %

Samples will be taken of the finished PBF for laboratory analysis, and comparison against the AUTOSORT analyser at the time the online measurements were recorded. Sampling will be performed as per EN 15442:2011 Solid Recovered Fuels – Methods for Sampling. This is achieved in the following way:

1. Gather the sample as per SOP 2130 - Routine PEF Sampling, for at least one minute of production, taking note of precisely the start time and the finish time
2. Prepare the sample as per SOP 2108 – Daily Sample Preparation
3. Run the chlorine result as per SOP 2105 – Determination of Calorific Value and SOP 2101 – Determination of Chlorine
4. View the chlorine data on the TOMRA analyser for the same time interval as the sample taken in 1. and compare

Based on the samples' laboratory analysis, TOMRA will optimize the parameterization of the analysis. Adaptation needs to be performed in steps of 0.05%, with every measurement to be repeated at least 3 times. A TOMRA field technician assists with this process.

Acceptance test for reproducibility of area measurements:

The TOMRA Online analyser continuously scans the surface of the product on the conveyor underneath the scanner and measures the surface area of PVC in the total material stream. This measured area is presented in % of the total material stream (surface area) and in cm2. By entering average values for the thickness and other relevant properties of the different materials into a database, the unit is able to calculate the mass of the materials and then the calorific value and PVC content of the total sample.

A minimum of 3 different samples will be taken of the described finished PEF material. Sampling will be performed as per EN 15442:2011 Solid Recovered Fuels – Methods for Sampling. Each sample should be at minimum 10 kg. Each sample will be scanned 7-10 times by the AUTOSORT analyser. It is necessary that the samples are presented to the machine in a monolayer and with constant speed of the conveyor.

Total measured area and area of PVC will be logged, and deviation from the average measured value will be calculated. The reproducibility of the measurements will be a maximum of 5% average deviation compared to the average measured value.

Moisture

Adaptation – measurement of moisture content in the range of 5% - 40 %

Samples will be taken of the finished PBF for laboratory analysis, and comparison against the AUTOSORT analyser at the time the online measurements were recorded. Sampling will be performed as per EN 15442:2011 Solid Recovered Fuels – Methods for Sampling. This is achieved in the following way:

1. Gather the sample as per SOP 2130 - Routine PEF Sampling and Sample Preparation, for at least one minute of production, taking note of precisely the start time and the finish time
2. Prepare the sample as per SOP 2108 – Daily Sample Preparation
3. Run the chlorine result as per SOP 2103 – Determination of Total Moisture Content in PEF
4. View the moisture data on the TOMRA analyser for the same time interval as the sample taken in 1. and compare

Based on the samples' laboratory analysis, Tomra will optimize the parameterization of the analysis. Adaptation needs to be performed in steps of 5 %, with every measurement to be repeated at least 3 times.

Calorific Value

Adaptation – measurement of calorific value in the range of 5 MJ/kg – 40 MJ/kg

Calorific value will be checked against known, pre-defined test materials, with the weight and specific properties of the material known in advance. The test material will be scanned a minimum of 5 times by the AUTOSORT analyser. It is necessary that the test materials are presented to the machine in a monolayer and with constant speed of the conveyor.

Testing and Review

This procedure will be reviewed and updated to reflect the actual calibration practices developed and used during the calibration of the on-line analyser.

- – CR-PR217 Managing Out of Specification PEF

CR-PR217 - MANAGING OUT OF SPECIFICATION PEF

Purpose
The purpose of this procedure is to describe the procedure to be used for managing out of specification Processed Engineered Fuel.

Scope
This procedure is to be used for the managing of out of specification Processed Engineered Fuel (PEF) at Cleanaway ResourceCo's Wetherill Park Resource Recovery Facility (CRRRF).

References

I.S. EN 15443:2011	Solid Recovered Fuels - Methods for the Preparation of the Laboratory Sample
I.S. EN 15442:2011	Solid Recovered Fuels – Methods for Sampling
SOP 2130	Routine PEF Sampling
SOP 2108	Daily Sample Preparation

Definitions

RRF	Resource Recovery Facility
PEF	Processed Engineered Fuel
PBF	Processed Biomass Fuel

Documentation

FORM 01	Corrective Action Request Form

Introduction
Cleanaway ResourceCo's Wetherill Park resource recovery process converts relevant waste materials into reusable commodities such as metal, aggregates and timber, and manufactures two different Process Engineered Fuel's. The resource recovery process is depicted in Figure 1.

The two distinct grades of Process Engineered Fuel that are manufactured are:

- Processed Biomass Fuel (PBF). This is produced through the hammer mill, is the heavier fraction of the recovered material, and is predominantly timber based. The PBF is manufactured to Specification A as detailed in Appendix 1.
- Processed Engineered Fuel. This is produced through the secondary shredder, is a lighter fraction of the recovered material, and is predominantly plastic based. The PEF is manufactured to Specification B as detailed in Appendix 1

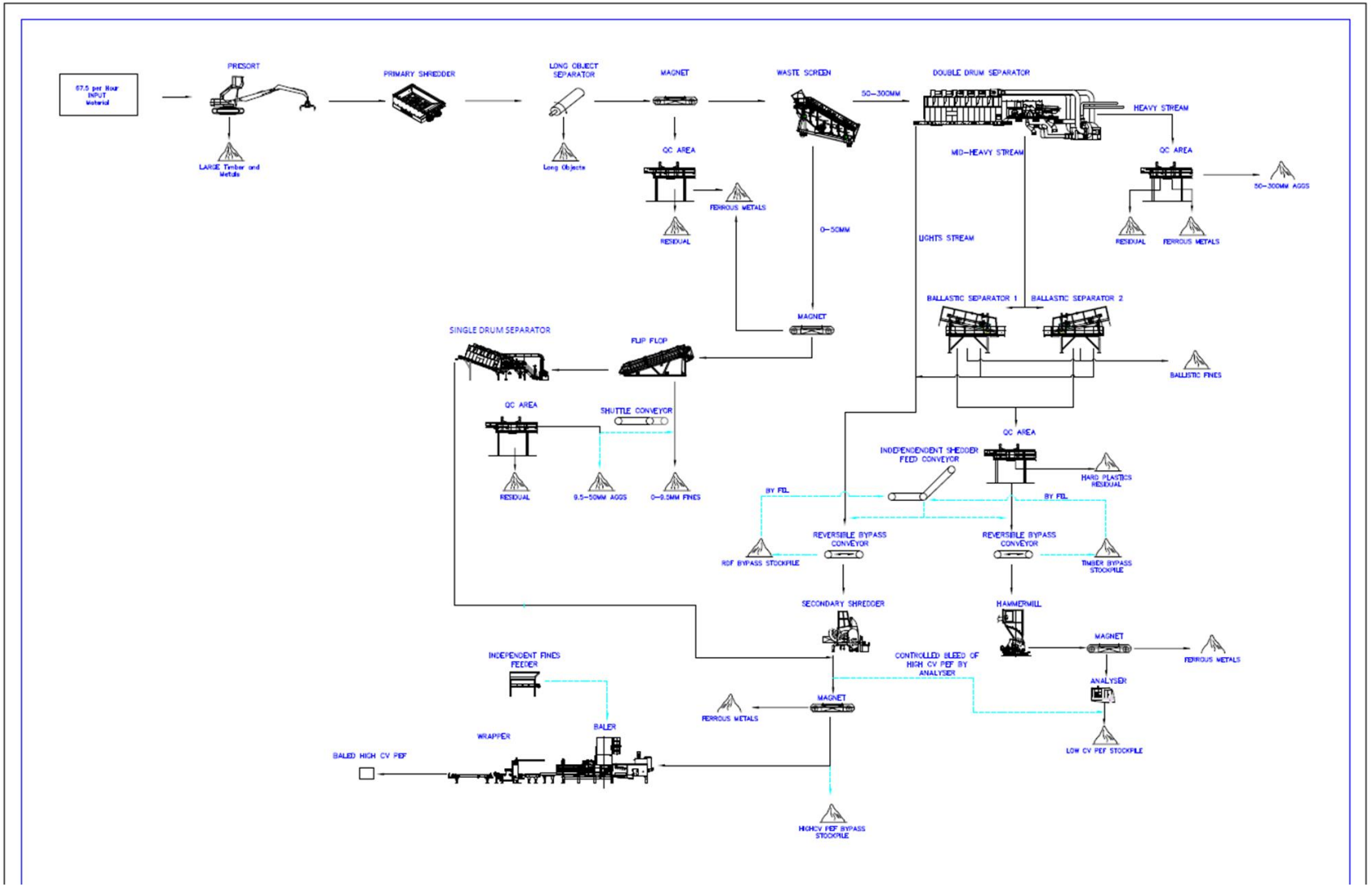

Figure 5 Process Flow Diagram

Quality Control

The online analyzer provides real time feedback on the major parameters of chlorine content (Cl), calorific value (CV) and moisture (H2O) for the PBF. Should the online analyzer detect that any of these major parameters are out of specification then the operational team is able to investigate immediately and potentially identify the failure in the process that has resulted in the change in quality.

Should the root cause be visually identified, and depending on the severity of the quality impact, the Supervisor can work with the team to remove the out of spec material from the PBF storage bay for reprocessing or mixing. This will ensure that any out of specification PBF is separated and quarantined from finished in-specification PBF.

Managing Out of Specification Results

Both the PBF and PEF stockpiles are to be sampled for the purpose of in-house laboratory testing every day as a part of internal quality control processes. Should the operational team report that the online analyser has detected potential non-conformances, the Laboratory Technician will report back the results from the laboratory specifically addressing the reported detections.

The laboratory result takes precedence over the online analyser results. Should divergences between the Laboratory and the online analyser results endure, a recalibration process must be followed, as per PROC 34 - On-line Analyser Calibration.

The samples are to be taken and prepared in-house as per SOP 2130 - Routine PEF Sampling and SOP 2108 - Daily Sample Preparation.

The sample is to be in-house tested for the following parameters and compared against both specifications – Specification A and Specification B as detailed in Appendix 1.

- Gross Calorific Value (CV)
- Moisture (as H2O)
- Chlorine (Cl)
- Ash
- Particle Size Distribution

Assessment of the laboratory analysis against the specifications in Appendix 1 will determine which of the following categories the quarantined PEF falls into, and the associated course of action:

- PBF meets specification A
- PBF doesn’t meet Specification A
- PEF meets specification B
- PEF doesn’t meet Specification B

PBF Meets Specification A

In the event that the laboratory analysis determines that the PBF sample complies with Specification A requirements the material can be arranged for delivery to the appropriate customer.

PBF doesn't meet Specification A

In the event that the laboratory analysis determines that the initial PBF sample (Part A1 in SOP 2130) does not comply with Specification A requirements, the retain sample (Part A2 in SOP 2130) must be in-house tested as well. The average parameter results across the Part A1 and A2 must then be analysed.

In the event that the average results comply with Specification A requirements the material can be arranged for delivery to the appropriate customer.

In the event that the average results do not comply with Specification A requirements but comply with Specification B requirements, then all of the relevant PBF material can be moved into the PEF stockpile for mixing and eventual baling for export.

In the event that the average PBF results (Part A1 and A2) do not comply with Specification A requirements or Specification B requirements, and if the stockpile remains in compliance with the storage limitations, cancel all customer deliveries for the PBF. On the next day of production, conduct the same daily testing for PBF in-house and include these results in the average score calculation with the previous day's failed results. Assess the updated average against the Specifications in Appendix 1.

Repeat this stockpiling and continuous testing process until:

a) The average PBF laboratory results satisfy Specification A or Specification B requirements and arrange for delivery accordingly. Or
b) If the continuous testing does not yield a favourable result before the stockpile reaches its allowable limit, remove the failed PBF material from the PBF storage bay for reprocessing.

PEF Meets Specification B

In the event that the laboratory analysis determines that the PEF sample complies with Specification B requirements the material can be baled and arranged for export to the appropriate customer.

PEF doesn't meet Specification B

In the event that the laboratory analysis determines that the initial PEF sample (Part A1 in SOP 2130) does not comply with Specification B requirements, the retain sample (Part A2 in SOP 2130) must be in-house tested as well. The average parameter results across the Part A1 and A2 must then be analysed.

In the event that the average results comply with Specification B requirements the material can be arranged for delivery to the appropriate customer.

In the event that the average PEF results (Part A1 and A2) do not comply with Specification B requirements, and if the stockpile remains in compliance with the storage limitations, cancel baling of the material. On the next day of production, conduct the same daily testing for PEF in-house and include these results in the average score calculation with the previous day's failed results. Assess the updated average against the Specification B.

Repeat this stockpiling and continuous testing process until:

a) The average PEF laboratory results satisfy Specification B requirements and arrange for the material to be baled and sent for export.
b) If the continuous testing does not yield a favourable result before the stockpile reaches its allowable limit, remove the failed PEF material from the PEF storage bay for reprocessing.

In the event that the laboratory analysis determines that the PEF does not comply with Specification B, and for whatever reason can't be salvaged through mixing or reprocessing, then all material will be disposed of at an EPA approved facility for the receipt of such material.

A non-conformance is to be raised, with a CAR (Corrective Action Request) form (Form 1) to be completed.

Appendix 1 Solid Recovered Fuel Specifications

Parameter	Specification A	Specification B
Gross Calorific Value (MJ/kg)	15	17
Moisture (as H_2O)	≤15.0% m/m	<15.0%
Chlorine (as Cl)	≤0.2% m/m	<0.8% m/m
Ash	≤15.0% m/m	<15.0%
Particle size	95% ≤ 50 mm in any direction	95% ≤ 50 mm in any direction
Total Fluorine, Bromine, Iodine (as F, Br, I)	≤0.2% m/m	Not specified
Sulphur (as S)	≤3.0% m/m	<3.0%
Bulk density (kg/m3) baled	Not specified	Not specified
K2O (%)	Not specified	Not specified
Na2O (%)	Not specified	Not specified
Mercury (Hg) (mg/kg)	≤1.2	<1.0
Cadmium (Cd) (mg/kg)	≤20	<100
Thallium (Tl) (mg/kg)	≤20	<100
Total Group II metals (mg/kg) Cadmium (Cd) + Thallium (Tl)	≤30	<100
Copper (mg/kg)	≤500	<3,000
Lead (mg/kg)	≤1000	<10,000
Zinc (mg/kg)		<30,000
Total Group III metals (mg/kg) Antimony (Sb) + Arsenic (As) + Cobalt (Co) + Copper (Cu) + Chromium (Cr) + Lead (Pb) + Manganese (Mn) + Nickel (Ni) + Vanadium (V)	≤3000	<10,000
PCB's (Polychlorinated	< 10 mg/kg	< 5 mg/kg

PCP's (Phencyclidines)	< 100 mg/kg	
Biomass Content	>90%	>50%

• CR-PR201 – Routine PEF Sampling Procedure and Sample Preparation

CR-PR201 - Routine PEF Sampling and sample Preparation

Purpose

The purpose of this procedure is to describe the sampling and sample preparation used to generate a representative sample of Processed Engineered Fuel (PEF), for the purpose of routine testing.

Scope

The procedure covers the requirements to obtain a representative test sample from the production process and reduce the sample quantity while ensuring that the composition of the final sample used for testing is not changed.

References

EN ISO 21637:2020	Solid recovered fuels – Vocabulary
EN ISO 21645:2021	Solid recovered fuels – Methods for sampling
EN ISO 21646:2022	Solid recovered fuels – Sample preparation

Definitions

PEF	Processed Engineered Fuel
LCV	Low Calorific Value
HCV	High Calorific Value
Increment	Quantity of PEF extracted in a single sampling operation
Lot	A defined quantity of PEF for which the quality is to be determined and to which contractual compliance applies
Sample A	Sample prepared for laboratory testing, approximately 2kg in mass
Sample Part A1	Sample prepared from Sample A for daily testing, approximately 500g
Sample Part A2	Sample prepared from Sample A for retest as required, approximately 500g
Sample B	Sample prepared and retained for Weekly Particle Size testing and Composite samples, approximately 2kg in mass
Sample C	Sample prepared and retained for the Monthly Composite sample, approximately 6kg in mass
Sample D	Sample prepared for Weekly Particle Size testing, at least 2.5kg in mass
Sample E	Sample prepared and retained for external laboratory testing, approximately 6kg in mass
Sample F	Sample prepared for Monthly Compositional analysis, approximately 6kg in mass

Introduction

The sampling principle under EN ISO 21645:2021 is that sampling shall be conducted by a means wherein every particle in the production process stream has an equal probability of being included in the sample.

The sampling principle under EN ISO 21646:2022 is that the composition of the sample taken from the production process stream shall not be changed during each step of the sample preparation process. Each sub-sample and the final sample used for testing shall be representative of the original sample.

General Requirements

Requirements for lot size, number of increments, increment size and sample size, are specified in EN ISO 21645:2021. This procedure interprets these requirements of the standard to provide practicable outcomes.

Lot size

EN ISO 21645:2021 recommends a maximum lot size of 1500 tonnes. An agreed lot size is a workable alternative without detriment to the final testing outcome. A practicable outcome is a monthly time-based lot size.

Number of increments

EN ISO 21645:2021 recommends a minimum number of increments of 24. With a time-based monthly lot size a sample taken daily over the course of a month leads to a minimum 20 sample increments which is a practicable outcome without detriment to the final testing outcome.

Increment size

EN ISO 21645:2021 makes no specific recommendation on increment size. What it does say is that the *"the size of an increment shall be large enough so that all particles have a chance to be part of the increment. Besides this for increments of material flows and conveyors the particles over the whole breadth of the material flow or conveyor shall have an equal chance of ending up in the increment"* the practicable outcome is that when sampling from a moving conveyor the full width and breadth of the material being conveyed must be captured which is then reduced by cone and quartering to the minimum sample size.

Sample size

EN ISO 21645:2021 provides a methodology for calculating minimum sample size. A formula is provided that takes into account the characteristic particle size, particle size distribution, particle shape, particle density and inhomogeneity of the material. Using this formula the minimum sample size calculates to 1.8 kg. A practicable outcome is a sample size of approximately 2kg. This is the sample size after cone and quartering the increment.

Tools and Equipment

- Heavy Duty storage container with lid (150L)
- Trolley Scale
- Shovel
- Laboratory Dispensing Scoop – 450ml
- Riffle splitter
- Sample bag and labels

- Sample trays
- Permanent marker

Safety

PPE – as per site requirements

- Notify all personnel of your presence in the area
- Use 2-way radio for all entry to the plant floor

Sampling

Samples shall be taken at a random time during each day of plant operation.

1. Before taking an increment sample, the process must have been in consistent operation for a minimum of 30 minutes.
2. An increment sample is to be taken from the entire flow from the relevant PEF finished product conveyor. The material can be captured in the bucket of a front-end loader. The quantity captured should not exceed 40 kg
3. The contents of the front-end loader bucket is discharged onto a clean area of the storage shed and mixed with a shovel then formed into a roughly circular heap.
4. Quarter the heap using the shovel and transfer one quarter to the heavy duty storage container, at least 8kg

Sample Preparation

Transfer the sample back to the laboratory and use the cone and quartering method to further reduce the sample size

1. Place the sample on a clean, hard surface.
2. Shovel the sample into a conical pile, placing each shovelful on top of the preceding one in such a way that the PEF runs down all sides of the cone and is evenly distributed and different particle sizes become well mixed.
3. Repeat this process three times, forming a new conical pile each time.
4. Flatten the third cone by inserting the shovel repeatedly and vertically into the peak of the cone to form a flat heap that has a uniform thickness and diameter. The flat heap should be no more than 200mm high.
5. Quarter the flat heap along two diagonals at right angles by inserting the shovel head into the heap. See Figure 1.
6. Discard one pair of opposite quarters.
7. Repeat the coning and quartering process until a quarter of approximately 2 kg in weight is obtained.

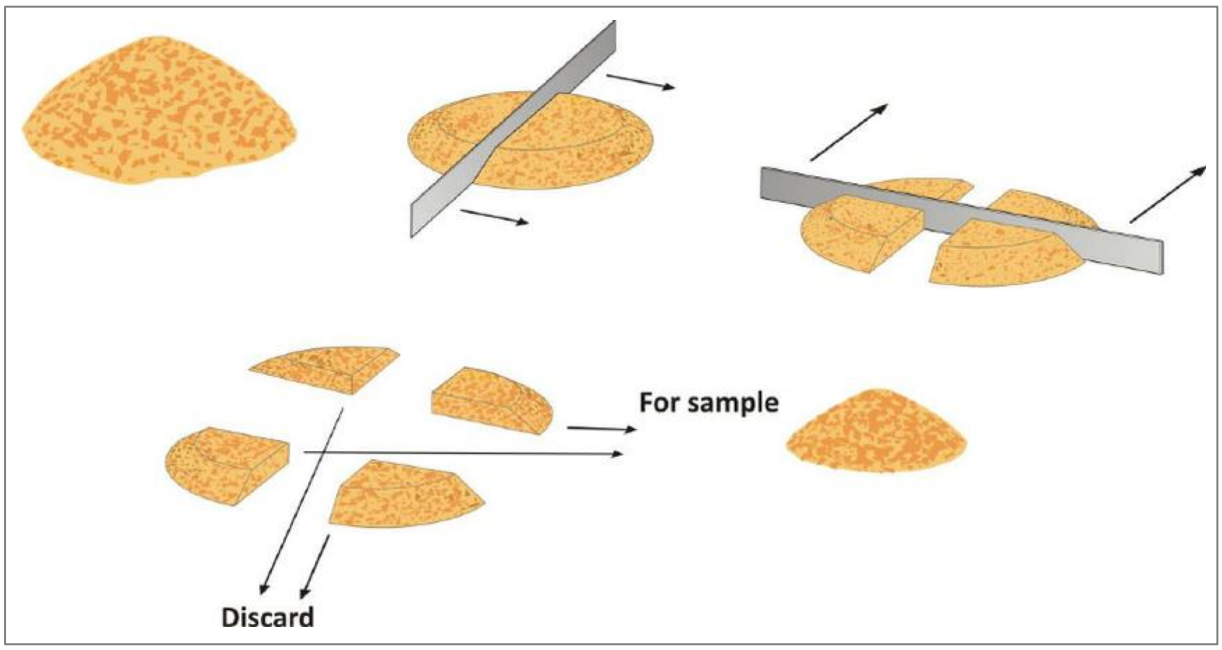

Figure 6 - Coning and Quartering Method

Daily Sample

Two opposite corners are taken to produce two laboratory samples; Part A and Part B, of approx. 2 kg each

- Part A is further size reduced, through the riffle splitter, into subsamples A1 and A2 so that both are approximately 500g each. A1 is submitted for the daily on-site lab analysis while A2 is retained in case a re-test is required. For the continuation of this process, refer to SOP 2108
- Part B is retained to produce the Weekly Particle Size and Composite samples

Weekly Sample

At the end of each week the daily samples are combined to form two weekly samples. With at least six daily samples per week, Part C is approximately 6kg and Part D is approximately 3kg.

- Part C is retained to produce the Monthly Composite sample
- Part D is submitted for the weekly particle size measurement

The daily samples must be thoroughly mixed in the cement mixer to form a homogeneous sample. Coning and quartering is then used to produce two opposite quarters, of approximately 3kg each, that are combined to make Part C a total of approximately 6kg.

The remaining 2 quarters of approximately 3kg each, are re-combined and are applied to the riffle splitter to produce Part D. Part D must be at least 2.5kg to be submitted for the particle size test. Part C and D are sealed in separate sample bags and marked with the appropriate identifiers. These bags are then stored in the laboratory fridge.

When the end of month and calendar week don't finish together the following practice applies:

For the last week of such months, Sample B must be doubled (2+2kg = 4kg) so that half can combine with the closest week of the relevant month to complete the composite (Sample B1) and the other half can go towards the weekly PSD Analysis (Sample B2).

Example - when the last day of the month is a Wednesday: B1 from Mon-Wed combine with the daily samples from the week before, to make the final weekly composite for that month (Sample C). B1 from Thurs-Sun eventually combine with the daily samples from the first full-week to come, which will result in first weekly composite for the new month (Sample C). B2 from Mon-Sun are then combined and then coned and quartered to make the PSD Analysis Sample (D).

Monthly Sample

At the end of each month, the weekly samples are combined to form two monthly samples, Part E and Part F of approximately 6kg each.

Part E is submitted for external testing
Part F is submitted for compositional analysis

The weekly samples must be thoroughly combined and mixed in the cement mixer, for at least 3 minutes, to form a homogeneous sample. Coning and Quartering is then used to produce four quarters of approximately 6kg each. Two opposite quarters are discarded. One of the remaining two quarters is used to form Part E and the other Part F. Both monthly samples are sealed in separate sample bags and marked with the appropriate identifiers. These bags are then stored in the laboratory fridge.

Note: All samples shall be placed into separate sample bags and sealed, with the following identification on each sample bag:

- Date and time of sampling
- Sample material
- Sample weight
- Sample Identification
- Source of Supply
- Name of person performing sampling
- Sampling performed in accordance with EN ISO 21645:2021, EN ISO 21646:2022

Labelling

Label all samples as per the CRRRF Sample ID Plan

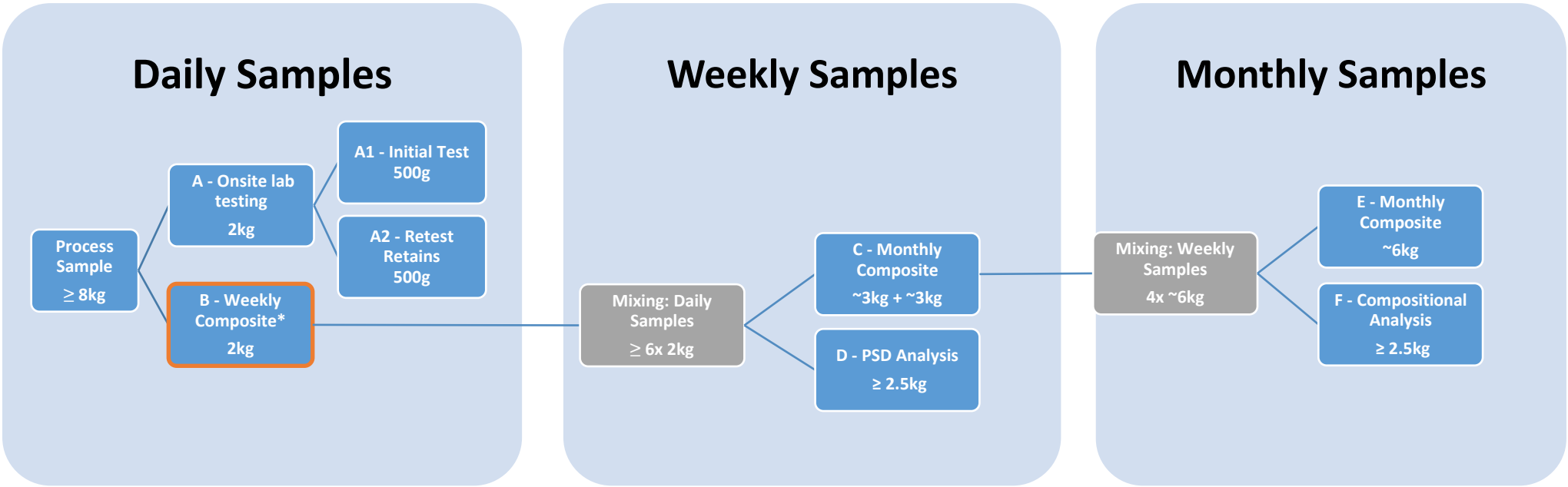

Figure 7 - Sampling process flow diagram

- – Test Methods

Test Methods

Parameter	Reporting unit	Test Method
Gross Calorific value	MJ/kg	I.S. EN 15400:2011
Ash	%	I.S. EN 15403:2011
Moisture	% H2O	I.S. EN 15414:2011
Chlorine	% Cl	I.S. EN 15408:2011
Fluorine	% F	I.S. EN 15408:2011
Bromine	% Br	I.S. EN 15408:2011
Iodine	% I	I.S. EN 15408:2011
Sulphur	% S	I.S. EN 15408:2011
Potassium	% K_2O	I.S. EN 15410:2011
Sodium	% Na_2O	I.S. EN 15410:2011
Mercury	mg/kg Hg	I.S. EN 15411:2011
Cadmium	mg/kg Cd	I.S. EN 15411:2011
Thallium	mg/kg Tl	I.S. EN 15411:2011
Copper	mg/kg Cu	I.S. EN 15411:2011
Lead	mg/kg Pb	I.S. EN 15411:2011
Antimony	mg/kg Sb	I.S. EN 15411:2011
Arsenic	mg/kg As	I.S. EN 15411:2011
Cobalt	mg/kg Co	I.S. EN 15411:2011
Chromium	mg/kg Cr	I.S. EN 15411:2011
Manganese	mg/kg Mn	I.S. EN 15411:2011
Nickel	mg/kg Ni	I.S. EN 15411:2011
Vanadium	mg/kg V	I.S. EN 15411:2011
Polychlorinated biphenyls	mg/kg PCB	SW846 USEAP
Phencyclidines	mg/kg PCP	SW846 USEPA
Particle Size 50 mm, 35 mm	% passing 50 mm % passing 35 mm	I.S. EN 15415-1:2011

- – Layers of Control

ResourceCo

ResourceCo has a long history of the manufacture of PEF for use as alternative fuel in cement kilns.

Adelaide:

Working closely with Adelaide Brighton Cement Limited, ResourceCo developed Processed Engineered Fuel (PEF) as a partial replacement for fossil fuels in the Adelaide Brighton cement kiln. The process harnessed the energy contained in combustible material that would have traditionally gone to landfill and resulted in the commissioning of Australia's first PEF manufacturing plant in South Australia in 2007.

Malaysia:

ResourceCo is an industry leader in waste recycling and waste management in Malaysia and Asia. It is a pioneer in the region for converting commercial and industrial waste into alternative energy; specifically, alternative fuels for the cement industry.

ResourceCo own the region's first waste to energy processing plant in Ipoh Malaysia, designed for the production of Processed Engineered Fuel (PEF). ResourceCo is in a long-term partnership to supply Lafarge Malaysia - a leading global cement manufacturer with approximately 70,000 tonnes per annum of alternative fuels for its cement kilns.

ResourceCo's approach to minimise any potential environmental impact or harm to human health by customers using PEF in their cement kiln involves six levels of risk protection as follows:

Customer Pre-Qualification

All potential waste customers will be required to be pre-qualified before being allowed to bring waste to the facility. This pre-qualification process will determine if the potential customers' waste meets the approved acceptance criteria for the site, whether it will enable high quality PEF products to be produced, and which category it meets for the PEF processing criteria.

Refer to attached document:

PROC 28 – *Incoming Waste Customer Pre-Qualification Procedure*

Waste Screening and Acceptance

1. Screening

   A comprehensive waste screening process is undertaken prior to receipt of all incoming waste.

   As outlined in Section 3 of the EfWMP, when a vehicle enters the weighbridge, the 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. 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 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). Item 3 below 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.

2. Monitoring

   As outlined in Section 3 of the EfWMP, 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

   Each vehicle load of PEF dispatched from ResourceCo's facility shall be assigned a transport certificate detailing the following.

   - Delivery date.
   - Time of departure.
   - Description of the Goods (e.g., Solid Recovered Fuel).
   - Gross/tare weights of the delivering/exporting vehicle.
   - Vehicle registration number; and
   - Unique reference number assigned to the load.

3. Hazardous Materials

   As outlined in Section 3 of the EfWMP, any specific waste types not permitted to be accepted into the facility 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:

- Traffic control/waste inspector on tipping floor during operational hours.
- 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 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.
- 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.

Sharps and medical waste

Sharps and medical waste identification training for all relevant staff on site. Refer to PROC 205 Hazardous Materials Response Management Plan

Hazardous Chemicals identification training for all relevant staff on site. Refer to PROC 205 Hazardous Materials Response Management Plan

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.

Characterization / baseline testing

Characterization or baseline testing is used to identify and quantify chemicals or other attributes, and to determine the physical properties of a material, to provide scientific understanding of the said engineered material. A characterization study is designed to determine how a process performs under actual operating conditions, to capture the variations in materials and operations, and to understand process capability. Knowing process capability allows one to predict, quantitatively, how well a process will meet specifications.

The comprehensive initial (baseline) sampling and testing of the PEF will enable the characterization of the PEF in terms of its typical composition and variability. This will allow for a quantitative assessment of the PEF and knowing its ability to meet specification, and how well the PEF will meet specification, prior to its use by new customers. Based on ResourceCo's experience and history of PEF manufacture, the characterization study will demonstrate that the PEF will be well within specification,

and the process is very capable of manufacturing PEF to the specification, providing reassurance that the risk of producing out of specification PEF is low.

Routine testing

Routine testing of the PEF is undertaken to demonstrate ongoing compliance with the specification, and confirms the product's ability to meet specification, and how well it meets specification, on an ongoing or regular basis.

Monitoring

The monitoring of the on-line analyser, and analysis of the on-site laboratory results will allow changes to be implemented both short term and long term to prevent PEF from going out of specification. As detailed in Section 8.1 of the EfWMP, real time feedback from the on-line analyser will enable continual refinement of the process to ensure that the key parameters remain within specification.

If monitoring of the on-line analyser and analysis of on-site laboratory results demonstrate abnormalities in the PEF, then a one-off sample may be sent to an independent NATA accredited laboratory for testing of all the parameters specified in the specification, to demonstrate compliance with the specification.

Trend Analysis

Trends in the composition of the PEF material will be monitored through:

- On-line analyser
- Spread sheet analysis.

Analysis of data, particularly,will:

- Capture the variations in the PEF, and to understand process capability.
- Capture changing trends in the composition of PEF over time.

This analysis will enable continual refinement of the process to ensure that all parameters remain within specification.

Appendix L – Air Quality Management Plan

ResourceCo RRF Pty Ltd
Air Quality Management Plan
Wetherill Park RRF

July 2025

27. Document Information

The following table contains administrative metadata.

Instructional material owner;	HSEQ Manager
Document ID:	CR-MP003
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Version History

The following table details the published date and amendment details for this document.

Date Published	Version Detail	Reason for issue of amendments	Author or Document Owner (Program)
22 February 2018	1	Approval by DPE 17/03/2018	GHD
November 2023	2	Update after IEA and OEMP audit. Update site data.	Gary Salway
January 2025	3	Update following rebrand to ResourceCo	Ben Whitehouse

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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
C&D	Construction and demolition
Construction and Demolition Waste	Waste arising from commercial or industrial premises, refurbishments and demolition and construction work
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
EPA	Environment Protection Authority
EPL	Environment Protection Licence issued by the EPA under the POEO Act
Load	the quantity of waste material delivered to the stockpile by truck, bin, or trailer
Minister	Minister for Planning (or delegate)
NATA	National Association of Testing Authorities
OEMP	Operational Environmental Management Plan
Operation	The receipt, removal, or processing of waste
Particulates; Particulate Matter (PM_{10})	A criteria air pollutant. Particulate matter includes dust, soot and other tiny bits of solid materials that are released into and move around in the air. Particulates are produced by many sources, including burning of diesel fuels by trucks and buses, incineration of garbage, mixing and application of fertilizers and pesticides, road construction, industrial processes such as steel making, mining operations, agricultural burning (field and slash burning), and operation of fireplaces and woodstoves. Particulate pollution can cause eye, nose and throat irritation and other health problems.
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
PM_{10}/$PM_{2.5}$	PM_{10} is measure of particles in the atmosphere with a diameter of less than 10 or equal to a nominal 10 micrometers. $PM_{2.5}$ is a measure of smaller particles in the air.
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
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
Waste	As defined in the POEO Act and includes any materials receive or processed on the site

28. Introduction

28.1 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 Air Quality Management Plan (AQMP) is one of a suite of plans that governs the operation of the facility.

28.2 Purpose

This AQMP has been developed to:

- Detail the potential air quality emission sources from the facility
- Outline the monitoring program designed to evaluate performance and compliance with air quality key performance indicators
- Identify control measures that will be implemented.

The AQMP provides an overall framework for air quality management during operation. It has been developed to satisfy the requirements of:

- Condition B34 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.

28.3 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 42 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

28.4 Environmental management system

28.4.1 ResourceCo corporate EMS

This AQMP 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.

28.4.2 Wetherill Park Resource Recovery Facility OEMP

This AQMP is a sub-plan to the Wetherill Park Resource Recovery Facility Operational Environmental Management Plan (OEMP). The OEMP is based on the ISO14001 Environmental Management System, which provides for continual improvement in environmental performance.

The OEMP is intended as an over-arching environmental management document that forms the basis for development of detailed sub plans (such as this) and procedures for managing specific environmental aspects and impacts. It 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 this document within the OEMP document framework is illustrated in Figure 1.

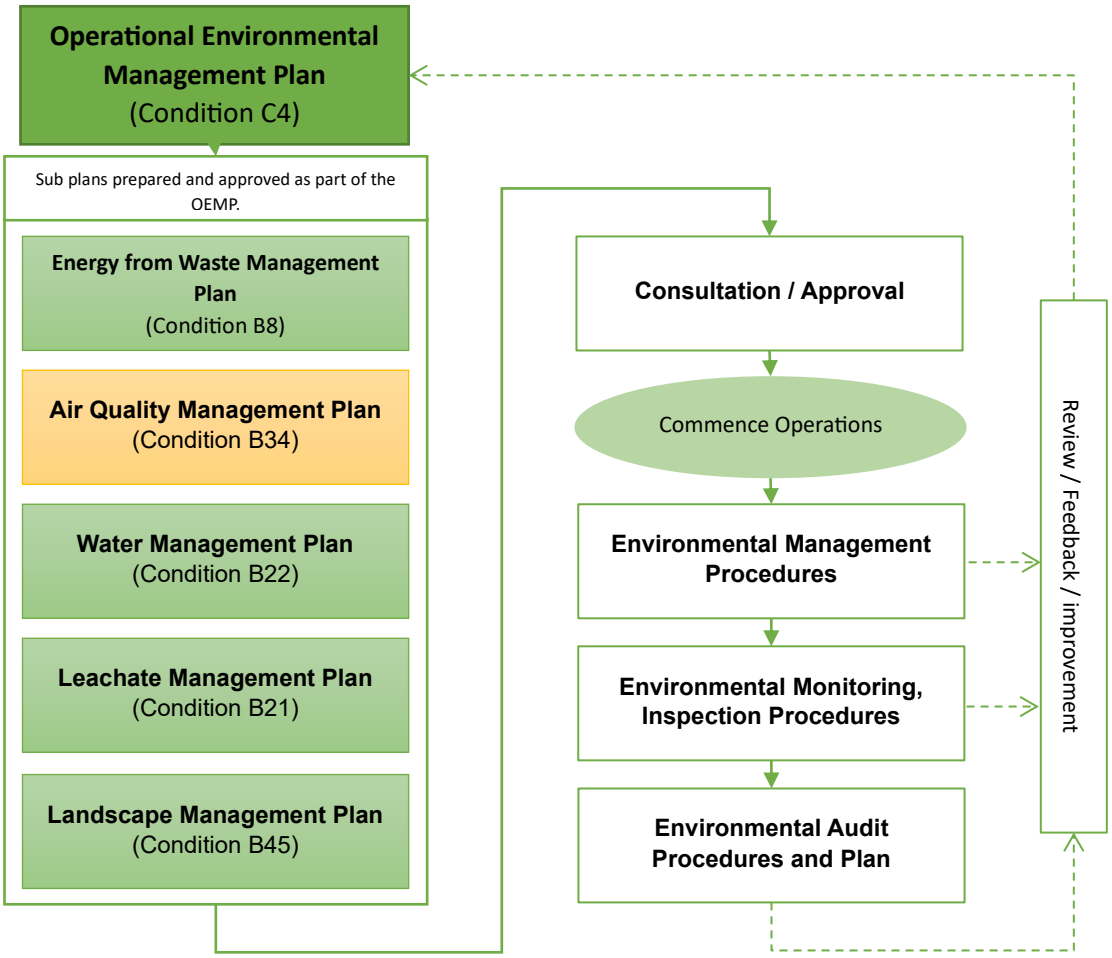

Figure 8 Operational environmental management document structure

28.4.3 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 (including this plan) 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.

28.4.4 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 AQMP 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.

28.5 Consultation and approval process

28.5.1 AQMP compliance with the Conditions of Approval

Table 2 lists the key requirements of Condition B34 and indicates where these requirements are addressed within this AQMP or other documents.

Table 9 Conditions of Approval requirements

Condition requirements	Response/reference
Condition B34	
Prior to the commencement of operations, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Secretary. The AQMP must form part of the OEMP required by Condition 4 and be prepared in accordance with Condition C6. The AQMP must:	Section 28.5.2
(a) detail and rank all emissions from all sources of the development, including particular emissions	Section 30
(b) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators	Section 32
(c) identify the control measures that will be implemented for each emission sources; and	Section 31
(d) nominate the following for each of the proposed controls:	Section 32
(i) key performance indicator;	
(ii) monitoring method;	
(iii) location, frequency, and duration of monitoring	
(iv) record keeping;	
(v) complaints register;	
(vi) response procedures; and	
(vii) compliance reporting	

28.5.2 Consultation and approval

In accordance with Condition B34, this AQMP is required to be prepared to the satisfaction of the Secretary of the Department of Planning and Environment.

29. Existing air quality

29.1 Odour

No significant odour sources have been identified in the close proximity to the site.

29.2 Dust and particulate matter

Air quality monitoring data from the Office of Environment and Heritage (OEH) air quality monitoring site at Prospect was used by Wilkinson Murray (2016) to characterise the ambient air quality in the area surrounding the site. The OEH's Prospect site is located approximately 5 km north of the site.

A summary of the PM_{10} monitoring results from 2012 to 2014 collected at the Prospect monitoring site is presented in Table 10. This indicates that ambient PM_{10} concentrations in the area surrounding the site are generally below recommended limit of 50 µg/m^3.

Table 10 PM_{10} Monitoring Results – Prospect

Year	Annual average (µg/m^3)	24-hour average (µg/m^3)	
		Maximum	90th percentile
2012	17.2	38.7	26.4
2013	19.2	81.8	210.9
2014	17.6	44.3	25.6

There is no readily available site-specific TSP and deposited dust monitoring data. However annual average background TSP concentrations can be estimated based on a relationship between measured PM_{10} concentrations. Similarly, annual average dust deposition levels can be estimated based on a relationship between TSP and dust deposition.

Applying these relationships at the Prospect monitoring station, Wilkinson Murray (2016) estimated an annual average TSP concentration of 43.0 µg/m^3 and a background annual average dust deposition of 1.4 g/m^2/month for the area surrounding the site.

The OEH monitoring site in Prospect began to record ambient concentrations of PM2.5 in December 2014. Table 11 presents a summary of this data between December 2014 and 15 October 2015.

Table 11 $PM_{2.5}$ Monitoring Results – Prospect

Year	Annual average (µg/m^3)	24-hour average (µg/m^3)	
		Maximum	90th percentile
2014/15	8.4	29.6	13.8

It should be noted that the annual average and maximum 24-hour average $PM_{2.5}$ concentrations measured at the Prospect OEH monitoring site exceed the NEPM advisory goals. There is one exceedance of the 24-hour average NEPM goal for $PM_{2.5}$ during 2015. This occurred during June, and is most likely the result of wood heaters being used in nearby residential areas.

30. Potential air emissions

This section provides details and ranking of the expected emissions from all sources of the facility, including particulate emissions.

30.1 Dust

Dust is expected to be generated during site operations due to handling and processing of materials and from truck movements on paved roads. The estimated dust emissions from all significant sources of dust generating activities are shown in the Table 12.

Table 12 Dust emissions estimates

Source	TSP emissions (kg/year)
Truck movements on paved roads	2,480
Handling aggregate materials	21
Handling combustible/PEF materials	<1
Shredding PEF materials	135
Total	**2,636**

It is noted that dust deposition is strongly influenced by particle size. The total dust emissions from the site can be separated into three fractions, based on particle size as presented in Table 13. The ground level concentrations of $PM_{2.5}$, PM_{10}, TSP and dust deposition levels are a combination of the relevant fractions.

Table 13 Dust particle size distribution

Particle category	Size range	Distribution (% of TSP)
Fine Particles (FP)	<2.5 µg	4.68
Coarse Matter (CM)	2.5 – 10 µg	34.4
Rest	10 – 30 µg	60.92

Table 14 Dust emissions estimates by particle size fraction (kg/year)

Source	TSP	Fine Particles (FP) <2.5 µg	Coarse Matter (CM) 2.5 – 10 µg	Rest 10 – 30 µg
Truck movements on paved roads	2,480	116	853	1511
Handling aggregate materials	21	1	7	13
Handling combustible/PEF materials	<1	<1	<1	<1
Shredding PEF materials	135	6	46	82
Total	**2,636**	**123**	**907**	**1,606**

30.2 Odour

No significant odour sources are expected during normal operations.

ResourceCo will accept customers loads which contain up to 5% putrescible waste. However, there is a possibility that a customer may deliver a load which contains significantly more than 5% putrescible waste, and that load would spend a small

amount of time on site before it is rejected and removed. It is anticipated that a partial load of putrescible waste would be on site for no more than 1 to 2 hours.

The estimated odour emissions from such a situation is presented in the following table (Wilkinson Murray 2016).

Table 15 Odour emissions estimate

Source	SOER ($OU.m^3/m^2/s$)	Area (m^2)	Odour flux rate	Peak to mean ratio	Peak odour flux rate
Putrescible containing load on tipping floor	3.65	100	365	2.3	840

30.3 Ranking of air emissions

The following table provides a ranking of air quality emissions. The priority air emission is dust from truck movements on paved roads. The emissions estimates for this source are conservative, as a number of mitigation measures are proposed to address dust generation outside of the buildings (refer Section 31).

Handling of aggregate materials, combustible/PEF materials and shredding of PEF materials would all be undertaken within the processing buildings and have less potential for total dust generation. The potential for odour emission is very low in terms of both rate of emission and frequency/duration and therefore has been ranked lowest.

Table 16 Ranking of potential air emissions

Rank (priority – highest to lowest)	Air emission	Quantity
1	Dust – truck movements on paved roads	2,480 kg/year
2	Dust – shredding PEF materials	135 kg/year
	Dust – handling aggregate materials	21 kg/year
	Dust – handling combustible/PEF materials	<1 kg/year
3	Odour – Putrescible containing load on tipping floor	365 OU/s

It is noted that the dispersion modelling by Wilkinson Murray (2016) demonstrates that dust and particulate matter emissions from the project would have negligible contribution to air quality at nearby sensitive residential receptors. While the existing ambient concentrations of $PM_{2.5}$ are slightly above the NEPM advisory goals, the facility is predicted to have a negligible effect on these levels.

Furthermore, Wilkinson Murray (2016) demonstrated that the predicted peak odour concentrations at nearby receptors are well below the assessment criteria and are likely to be undetectable.

31. Management measures and controls

While the air quality impact assessment (Wilkinson Murray 2016) has demonstrated that the operation of the facility is expected to comply with all relevant air quality criteria, a number of management measures and controls are proposed to further minimise the potential for air quality impacts. Table 17 provides a summary of these management measures and controls.

Table 17 Summary of air quality management measures and controls

Source	Management measures and controls
Dust	
Truck movements on paved roads	An industrial sweeper will be used to clean roadways and operational areas on a regular basis. A 20 km/h speed limit will be enforced on internal roads to minimise dust generation. All loaded vehicles entering and leaving the site will be required to be covered
Handling aggregate materials	The main building will be fitted with dust suppression sprays at key locations, including conveyors of the processing plant and stockpile sprinklers Rapid roller doors will be installed in all locations where regular access is required Conventional doors will be installed in other locations which will remain closed during normal operations except for access and egress Engines of trucks and mobile plant will be switched off when not is use Maintenance and servicing of plant will be carried out in accordance with manufacturer's specifications Drop heights will be reduced during loading and unloading of material Dust suppression and extraction equipment will be installed at major dust generation points in the process.
Handling combustible/PEF materials	
Shredding PEF materials	
Odour	
Loads containing putrescible materials	Incoming loads containing odorous materials will be identified immediately and rejected from the site. Procedures for staff to report the presence of odours

32. Monitoring and evaluation

This section outlines the program that will be implemented to evaluate the air quality performance of the facility operation and determine compliance with key performance indicators.

33. Dust

33.1.1 Key performance indicators/targets

The key performance indicators/targets for the proposed dust controls are:

- No dust complaints

33.1.2 Monitoring

- Record any dust complaints in the Complaints Register – on occurrence.
- Investigate and respond to any dust complaints in accordance with the Section 10.9 of the OEMP: Complaints handling, investigation and rectification and Section 7.5.2 below – on occurrence
- Dust observations at the property boundary – weekly as part of regular inspections
- Check Complaints Register for dust issues – monthly.

33.1.3 Response

The Air Quality Assessment by Wilkinson Murray (2016) demonstrated that dust and particulate matter from the facility would have negligible contribution to air quality at all nearby sensitive residential receptors.

In the event that a dust complaint is received, ResourceCo will:

- Implement the complaints management strategies in accordance with the Section 10.9 of the OEMP
- Ensure that investigation of any dust complaint includes:
  - Recording details of the complaint in the Complaints Register (REG 10)
  - Recording meteorological conditions at the time of the complaint
  - Identifying any activities/incidents on site that may have contributed to offsite emission of dust.
  - Reviewing if the facility operation (activities/incidents) were likely to have contributed to an offsite dust emission/dust complaint
  - Dust observations at the property boundary
- Identify and initiate appropriate action in response to the complaint and follow-up contact with the complainant.

If visible dust is observed during dust observations at the property boundary:

- Undertake dust monitoring. Dust monitoring will consist of targeted dust monitoring (PM_{10}) using a DustTrak or similar (light-scattering laser photometer) for a period of a week during appropriate weather conditions.

If activities/incidents on site are deemed to have contributed to the dust incident, ResourceCo will review and identify site management practices to ascertain if

amendments are required. Amendments may include additional controls and management measures and/or development of additional ongoing monitoring requirements.

33.2 DUST DEPOSITION MONITORING

Baseline monitoring data for dust deposition was not undertaken during the EIS. Additionally, a review of the EPA's Sydney air quality monitoring stations identified that the EPA do not measure dust deposition as part of their air quality monitoring program. Therefore, no baseline data for dust deposition has been presented.

The EPA criteria of 4g/m2/month as detailed in the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (2016) will be used in place of baseline data.

Performance criteria

The EPA expresses dust deposition criteria in two ways. Firstly; in terms of an acceptable increase in dust deposition over the existing background/baseline deposition levels. As background/baseline dust deposition levels are not available this criterion has not currently been adopted.

The second criterion is a measure of maximum total dust deposition levels. This criterion has currently been adopted for the Project. The long-term (annual average) EPA criterion for depositional dust that applies to the Project is provided in Table 1.

Table 1 Long-term impact assessment criterion for deposited dust **Pollutant**	**Averaging period**	**Maximum total* deposited dust level**
Deposited dust	Annual	4g/m2/month

33.3 Real-time Dust Monitor

The primary intent of these monitors is to provide feedback to the operations team of excessive dust levels onsite, where further action can be taken to control this. An email alert and SCADA Critical System Alert will be activated when elevated dust levels are experienced at these monitors.

Environmental Risk Event Checklist

The Control System alerts operators of the plant when a particular environmental risk event is occurring (Environmental System Alert). This may be initiated by high dust levels or high/extreme dust risk conditions. If an alert is activated, an Environmental Risk Event Checklist is required to be completed, including actions taken to control or mitigate the situation

Environmental Monitoring Database

Data obtained from the air quality monitoring programs is handled as follows:

- Data is analysed and compiled by HSEQ Manager
- Data is compared with relevant criteria; and
- Data is reviewed by the Quality Department. In the event of a recorded exceedance, CRRRF will investigate any potential contribution.

Environmental Monitoring Assessment

In the event of an exceedance of the relevant air quality monitoring criteria, an assessment will be conducted by the HSEQ Department to determine if the exceedance is due to RRRF operation activities (i.e. conduct a review of other non-CRRRF activities in the area and if relevant, historical monitoring data). If the exceedance is determined to potentially be the result of CRFFF operation activities, the HSEQ Manager will implement a management strategy in response to the exceedance.

33.4 Odour

33.4.1 Key performance indicators/targets

The key performance indicators/targets for the proposed odour controls are:

- No odour complaints

33.4.2 Monitoring

- Record any odour complaints in the Complaints Register – on occurrence.
- Investigate and respond to any odour complaints in accordance with the Section 10.9 of the OEMP: Complaints handling, investigation and rectification and Section 33.4.3 below – on occurrence
- Check Complaints Register for odour issues – monthly.

33.4.3 Response

The Air Quality Assessment by Wilkinson Murray (2016) indicated that the facility would not have any significant odour issues including that the peak odour emissions from the site would not be detectable.

In the event that an odour complaint is received, ResourceCo will:

- Implement the complaints management strategies in accordance with the Section 10.9 of the OEMP
- Ensure that investigation of any odour complaint includes:
  - Recording details of the complaint in the Complaints Register (REG 10)
  - Recording meteorological conditions at the time of the complaint
  - Identifying any activities/incidents on site that may have contributed to generation/emission of odour.
  - Reviewing if the facility operation (activities/incidents) were likely to have contributed to an odour issue/the odour complaint

- Identify and initiate appropriate action in response to the complaint and follow-up contact with the complainant
- If activities/incidents on site are deemed to have contributed to the odour incident, review and identify site management practices to ascertain if amendments are required. Amendments may include additional controls and management measures and/or development of additional monitoring requirements.

34. Records and reporting

Environmental management records generated will be identified, collected and stored in accordance with ResourceCo's quality management system. Reporting and review will include the following:

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

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

35. Review and improvement

35.1 Review of the Air Quality Management Plan

The AQMP will be reviewed on a regular basis to ensure that it accurately reflects the ResourceCo EMS and conforms to applicable legislative and other requirements. The frequency of review will be at least annually as part of the OEMP review, or more frequently, as a result of a significant non-conformance or as directed by the Secretary of the Department of Planning and Environment or other authority.

At the conclusion of the review process, any recommendations for change, or improvement, to EMS will be reflected through amendments to the relevant system element including the OEMP, other 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 documentation will be approved 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 documentation 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 lists the types of amendments that would be considered minor and major, and the approval process.

Table 18 AQMP 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	Dust 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

35.2 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. 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.

36. References

Nexus Environmental Planning Pty Ltd (2016) Environmental Impact Statement titled 'Waste and Resource Management Facility' SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

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

NSW Department of Environment and Conservation (2005) "Approved Methods for the Modelling and Assessment of Air Pollutants in NSW", August 2005.

Wilkinson Murray (2016) 'Waste and Resource Management Facility: Air Quality Impact Assessment', Report No. 14278-AQ Version A.

Appendix M – Water Management Plan

Wetherill Park ResourceCo RRF Pty Ltd

Water Management Plan

Wetherill Park RRF

May 2025

37. Document Information

The following table contains administrative metadata.

Instructional material owner;	HSEQ
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Version History

The following table details the published date and amendment details for this document.

Date Published	Version Detail	Reason for issue of amendments	Author or Document Owner (Program)
February 2023	Version 3	Update after IEA and OEMP audit. Update site data.	Gary Salway
May 2025	Version 4	Updated following completion of stormwater management review.	Ben Whitehouse

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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
C&D	Construction and demolition
Construction and Demolition Waste	Waste arising from commercial or industrial premises, refurbishments and demolition and construction work
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
EPA	Environment Protection Authority
EPL	Environment Protection Licence issued by the EPA under the POEO Act
Load	the quantity of waste material delivered to the stockpile by truck, bin, or trailer
Minister	Minister for Planning (or delegate)
NATA	National Association of Testing Authorities
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
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
Waste	As defined in the POEO Act and includes any materials receive or processed on the site

38. Introduction

38.1 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 Water Management Plan (WMP) is one of a suite of plans that governs the operation of the facility.

38.2 Purpose

This WMP has been developed to:

- Detail water use, metering, disposal, and management on-site
- Detail the water licence requirements.
- Detail the arrangements for management of wastewater streams on-site including leachate and firewater.
- Document the proposed Surface Water Management Plan including:
  - (i) the program to monitor:
    - Surface water flows and quality; and
    - Surface water storage and use
  - (ii) sediment and erosion control plans
  - (iii) surface water impact assessment criteria, including trigger levels for investigating potential adverse surface water impacts
  - (iv) a protocol for investigation and mitigation of identified exceedances of the surface water impact assessment criteria

The WMP provides an overall framework for water management during operation. It has been developed to satisfy the requirements of:

- Condition B22 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.

38.3 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 42 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

38.4 Environmental management system

38.4.1 ResourceCo Corporate EMS

This WMP 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.

38.4.2 Wetherill Park Resource Recovery Facility OEMP

This WMP is a sub-plan to the Wetherill Park Resource Recovery Facility Operational Environmental Management Plan (OEMP). The OEMP is based on the ISO14001 Environmental Management System, which provides for continual improvement in environmental performance.

The OEMP is intended as an over-arching environmental management document that forms the basis for development of detailed sub plans (such as this) and procedures for managing specific environmental aspects and impacts. It 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 this document within the OEMP document framework is illustrated in Figure 1.

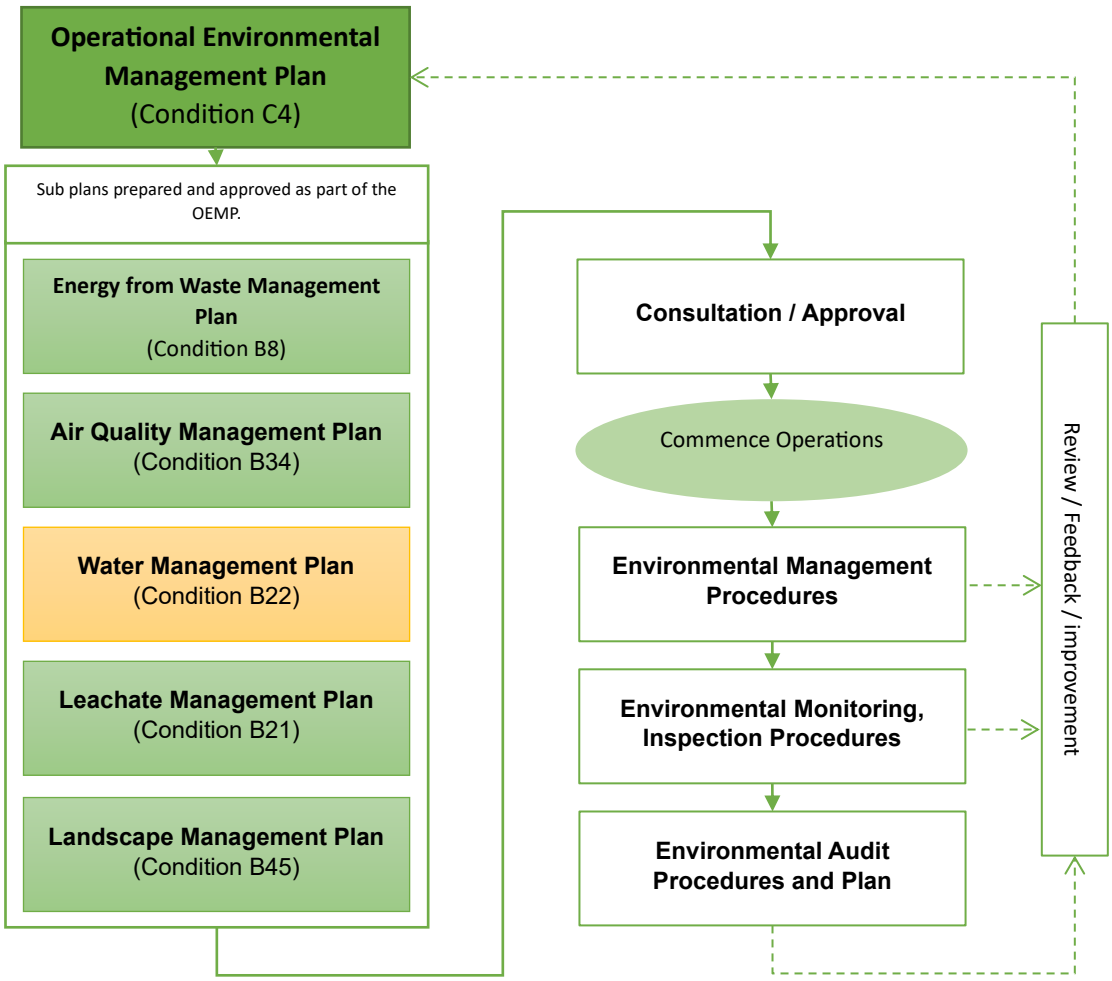


Figure 9 Operational environmental management document structure

38.4.3 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 (including this plan) 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.

38.4.4 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 WMP 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.

38.5 Consultation and approval process

38.5.1 WMP compliance with the Conditions of Approval

Table 2 lists the key requirements of Condition B22 and indicates where these requirements are addressed within this WMP or other documents.

Table 19 Conditions of Approval requirements

Condition requirements	Response/reference
Condition B22	
Prior to the commencement of operations, the Applicant must prepare a Water Management Plan. The Water Management Plan must:	
(a) form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6	
(b) be prepared in consultation with DPI	Section 38.5.2
(c) detail water use, metering, disposal, and management on-site	Section 39
(d) detail the water licence requirements for the development	Section 39
(e) detail the management of wastewater streams on-site, including leachate and firewater	Section 39.3
(f) contain a Surface Water Management Plan, including:	Section 40
(i) a program to monitor: • Surface water flows and quality • Surface water storage and use	
(ii) sediment and erosion control plans	
(iii) surface water impact assessment criteria, including trigger levels for investigating potential adverse surface water impacts	
(iv) a protocol for the investigation and mitigation of identified exceedances of surface water impact assessment criteria	

38.5.2 Consultation and approval

In accordance with Condition B22, this WMP is required to be prepared in consultation with the DPHI.

The initial version of this document was approved by the NSW Department of Planning, Housing and Infrastructure on 18th March 2018. All further updates are required to be submitted to DPHI for approval. This is version 4 of this document and encompasses the completion of the stormwater management review as detailed in EPL 20937 condition U1.

39. Water use, metering, disposal, and management on-site

39.1 Water demand and water use

39.1.1 Water demand

Table 20 summarises the estimated daily water demands for each month of the year. The key water demands include:

- Process water
- Toilet flushing
- Landscape watering

Where monthly rainfall is expected to exceed evapotranspiration, it is assumed that no landscape watering is required.

Table 20 Daily water demands.

Month	Processing Use (kL/day)	Toilet Flushing (kL/day)	Landscape Watering (kL/day)
Jan	55.9	0.84	0.47
Feb	54.6	0.84	0.19
Mar	50.5	0.84	0.08
Apr	43.4	0.84	0.00
May	33.1	0.84	0.00
Jun	19.9	0.84	0.00
Jul	16.5	0.84	0.00
Aug	29.0	0.84	0.18
Sep	39.3	0.84	0.45
Oct	47.6	0.84	0.57
Nov	51.7	0.84	0.54
Dec	55.9	0.84	0.74

39.1.2 Rainwater re-use

Apart from a minor volume of water for amenities, the facility is expected to require about 15.5 ML of water per year of which an average of 4.82 ML per year (31%) would be provided by rainwater as follows:

- Process water supply of 30% from rainwater (4.49 ML/year)
- Toilet flushing and landscape water supply of 82% from rainwater (0.33 ML/year).

39.2 Water management and disposal

39.2.1 Stormwater drainage

In accordance with the requirements of Fairfield City Council, no on-site detention of stormwater is required.

The stormwater drainage system includes a below ground pit and pipe network designed to control nuisance flooding and enable effective stormwater management for the site. The piped system has been designed to convey runoff from 20-year average recurrence interval (ARI) storm.

A combination of grated inlet pits and side entry pits are used on the site.

The majority (98%) of the new pit and pipe network connects to the 900 mm diameter stormwater line located at the north-west corner of the site. The remainder of the pit and pipe network is discharged directly to the kerb on Frank Street.

For storms larger than 20-year ARI up to 100-year ARI, the drainage system incorporates overland flow routes over proposed hardstand, car parking and landscaped areas which have been designed to ensure that personal safety is not compromised.

In this case, overland flows are designed to drain to the south where they can safely exit the site onto Frank Street via the access road.

Roof water from the production building drains to an underground rainwater harvesting tank (300kL) located under the roadway on the northern side of the facility. Roof water from the office and workshop building drains directly to an above ground rainwater tank (capacity 27kL). Overflows from the 27kL tank is conveyed by the surface stormwater collection system to the northern end of the site.

The stormwater drainage plan is provided in Drawings TX-11972.00-C10 and TX-11972.000C11 in 15.

All stormwater drains/pits on the site will be provided and maintained with the message “This pit drains to the Georges River”. Lettering will be 100 mm high block bold yellow painted lettering. Paints used is of road line marking standard.

39.2.2 Stormwater pollution control

The proposed stormwater quality improvement measures are shown in Drawings TX-11972.00-C10 and TX-11972.000C11 in 15.

Stormwater pollution controls include a series of treatment devices:

- HumeGard HG18 GPT
- Humes JellyFish JF3000-19-4 Filter
- OceanGuard 200-micron bags in site drains

39.3 Management of wastewater streams

39.3.1 Fire water containment

In the instance of a fire event, the facility design caters for the containment of contaminated fire services water on site. Contaminated fire services water is removed from the site by vacuum truck. Refer to the Leachate Management Plan for details.

39.3.2 Leachate management

The waste materials received into the site are dry in nature and are stored under cover in the manufacturing building. There are no waste materials stored outside. In the rare instance that materials received into the manufacturing process release leachates, for example if a non-conforming load of wet waste is delivered, the design of the receiving slab levels caters for an effectively bunded area that directs water away from exit points and contains it within the facility.

Any residual water contained in the facility will be emptied via vacuum trucks and any leachates removed from the site to an appropriately licensed disposal facility. Refer to the Leachate Management Plan for details.

39.4 Metering

The facility is connected to the potable water supply.

39.5 Water licence requirements

Nil.

40. Surface Water Management Plan

40.1 Plan objective and approach

The Surface Water Management Plan is to define the surface water monitoring program to be conducted through the operational life of the development, meeting the requirements of development approval documentation, commitments, and requirements as listed in Section 38.2. Specifically, this monitoring program has been prepared in response to the requirement B22(f) of Development Consent (Application no. SSD 7256; File reference no. 15/13400) and requirements from Conditions O4.1 and O4.2 of NSW EPA General Terms of Approval (GTA) – Issued for the site (notice no. 1545129).

Site operational life for surface water management consists of three stages: pre-commissioning, commissioning, and ongoing operations. The site is currently in the operational phase and therefore is looking to ensure the ongoing performance of site surface water management.

As such, the monitoring program detailed in below Sections 40.2 through 4.5 was developed considering site operations and surface water storage, reuse, flow and quality, with sediment and erosion control plans are presented in 16. This program was developed to provide the data necessary for assessment of site surface water management performance.

The findings of this program are used to assist in stormwater management including the management of runoff contamination of surface water, the management of site flooding and minimising impacts to downstream flow conditions.

40.2 Surface water drainage and monitoring locations

The drainage of surface water at the site is discussed in Section 39.2.1 and includes stormwater conveyance to the 900 mm stormwater culvert in the adjacent drainage easement and to the Council's street kerb/gutter[1], designed as detailed in Triaxial Consulting letter report (dated 6 September 2016) and drawings TX-11972.00 – C2.0, – C2.1 and – C2.2 Issue C (refer 15). Surface water management at the site is summarised as follows:

- **Overland flow to site infrastructure |** The majority of the site (approximately 98% of property area) drains runoff over impervious areas to pits and piping conveying stormwater by gravity away from the process area of the site and to the northwest property boundary stormwater pollution controls (i.e., gross pollutant trap and jellyfish membrane filter). This flow is then conveyed by gravity through to the junction box (identified as 'JB1') connection to the downstream 900 mm diameter culvert in the stormwater drainage easement.
- **Overland flow to offsite infrastructure |**The southwest corner of the property (approximately 2% of property area) drains runoff via the site access road to the Council's adjacent Frank Street stormwater infrastructure through grated inlet pits with pollution controls (i.e., litter baskets). The southwest corner of the property is away from the manufacturing building, separated also by dry sumps and capture pits, and is thereby anticipated to drain only relatively clean rainfall runoff.

[1] In accordance with Development Consent requirement B19 (in line with Council's Stormwater Drainage Policy).

- **Roof water from office and workshop/service building |** Runoff drains to two above ground rainwater tanks (combined capacity of 27kL) prior to overflow draining by gravity to the above-noted pits/piping and discharging off site through JB1 to the 900 mm diameter culvert in the stormwater drainage easement.
- **Roof water from manufacturing building |** Runoff drains to one below ground rainwater tank (capacity of 300kL) for reuse as part of the manufacturing operations. Overflow from this tank is conveyed by gravity to a junction box ahead of JB1, prior to discharging off site through JB1 to the 900 mm diameter culvert in the stormwater drainage easement.

The downstream 900 mm diameter circular stormwater drainage easement culvert conveys site and other upstream area stormwater runoff approximately 0.35 km to an open surface water canal. The canal conveys water from this point east then south approximately 0.90 km to Prospect Creek.

The monitoring locations for the site are proposed based on the site surface water management, as summarised above and to characterise the majority of runoff (approximately 98%). These site water quality sampling locations are listed below and shown on drawing TX-11972.00 – C2.1 in Appendix A:

- **S1 –** Located at the boundary of site on the truck entrance driveway. This point is not impacted by site specific activities.
- **S2 –** Adjacent to the site's weighbridge. This point collects runoff from southern concrete site areas. This point has the potential to be impacted by site activities.
- **S3 –** Along the western boundary of site. This point collects runoff from western concrete areas. This point has the potential to be impacted by site activities.
- **S4 –** Rear of site. This point collects runoff from northern and eastern concrete areas. This point is not impacted by site activities.
- **S5 –** North-western corner of site. This is the collection point from all upstream points on site. This point drains into site stormwater treatment system. This point has the potential to be impacted by site activities.
- **S6 –** North-western corner of site. This point is the water discharge point for site and is after the sites stormwater treatment system. This point has the potential to be impacted by site activities.
- **R1 –** In front car park. This point is the roof run-off for the office building before they enter the rainwater retention tanks. This point is not impacted by site activities
- **R2 –** North-eastern corner of site. This point is the roof run-off for the factory building and drains into the sites stormwater treatment system. This point is not impacted by site activities.
- **U1 –** North-eastern corner of site. This point is the upgradient receiving point from upstream of site. This point is not impacted by site activities.

The monitoring of the upstream location allows for understanding of the water quality in the receiving system.

The monitoring of water quality for the clean rainfall runoff (approximately 2%) from the southwest corner of the property is not deemed required based on the small catchment of this area and lower quality risk posed by this area.

The findings of water quality monitoring will provide data to inform the assessment of site surface water management performance. With regard to monitoring of surface water flow rates and volumes, runoff from the site is conveyed by gravity to the area 900 mm stormwater drainage easement. As such, the direct measurement of this flow rate is not practicable. The site staff will collect as appropriate rainfall records for the applicable to the area. Using these records and if required by the NSW EPA, calculations of estimated volume discharged from the site could be performed. Separately, the water reused from the 300kL rainwater tank will be conveyed to the manufacturing facility by pumping and this flow may be measured and logged as part of operations.

40.3 Monitoring analytes and rationalisations

Surface water monitoring includes water quality sampling and analyses specific to the development. The development is for a waste and resource management facility to convert waste materials into commodities for reuse (e.g., metal, timber, concrete, bricks, rubble and soil) and process engineered fuel (e.g. timber and plastics for solid fuel in cement kilns). Considering these operations, the site-specific stormwater and leachate related analytes are listed in Table 21.

Table 21 Monitoring analytes

Surface water management (stormwater and leachate analytes)	
Field parameters	***Metals (dissolved and total)***
Electrical conductivity (µS/cm)	Aluminium
Oxidation-reduction potential (ORP)	Arsenic
pH	Boron
Temperature	Cadmium
Turbidity	Chromium
General chemistry parameters	Cobalt
Anions (i.e., total alkalinity as $CaCO_3$, sulfate and chloride)	Copper
Biochemical oxygen demand	Iron
Cations (i.e., calcium, magnesium, sodium, and potassium)	Lead
Dissolved organic carbon	Manganese
Hardness	Mercury
Total dissolved solids	Nickel
Total suspended solids	Selenium
Hydrocarbons	Zinc
Total recoverable hydrocarbons (C6-C40) (includes volatile organic compounds)	***Nutrients***
Benzene, toluene, ethylbenzene, xylene, and naphthalene (BTEXN)	Ammonia
Polycyclic aromatic hydrocarbons (PAHs)	Nitrite and nitrate
Other parameters	Total Kjeldahl nitrogen (TKN)
Oil and grease	Total nitrogen
Organochlorine pesticides (suite of 15 analytes)	Total phosphorous
Organophosphate pesticides (suite of 11 analytes)	

Sampling for above-noted site-specific analytes assists in the evaluation of surface water management performance as detailed in below Section 40.5. Should the water quality findings indicate analyte concentrations consistently at less than 50 percent of the defined site performance benchmarks (refer below Section 3.5) or less than the limit of reporting, discontinuing sampling for the analyte may be warranted.

40.4 Monitoring frequency and methods

The requirements of this monitoring program are to assess and minimise site-related potential surface water impacts to downstream surface water conditions. The overall site stormwater management comprises stormwater capture, conveyance, filtration, and discharge to the stormwater drainage easement. Given the impervious nature of the development (e.g., paved surfaces and building roofs), rainfall events will cause immediate runoff which ceases shortly after the event. Further, potential contaminants are likely to be contained at onset of rainfall runoff. As such, site-related potential surface water impacts would be limited to rainfall events with contaminants primarily present at onset. As such, event-based single water quality sampling is appropriate and deemed an appropriate approach.

40.4.1 Frequency

Given the site-related potential surface water risks are greater during rainfall events (and particularly at the initial stages of rainfall), this monitoring program's rainfall event-based monitoring frequency has been set as listed below, for the pre-commissioning, commissioning and ongoing operations monitoring stages with additional spill event-based monitoring. The monitoring methods are subsequently discussed. This staged monitoring program satisfies requirements from Conditions O4.1 and O4.2 of NSW EPA GTA.

A key concept in defining the proposed monitoring frequency is a specified site sampling trigger as defined below for the staged monitoring and spill monitoring:

- **Staged Monitoring Site Sampling Trigger |** Based on rainfall experienced, target to complete sampling on average approximately once every 6 months and include larger rainfall events where possible.
- **Spill Monitoring Site Sampling Trigger |** Spill event where trained site staff have observed a spill conveyed to the site surface water management system and/or when a spill occurs during a rainfall event.

Water sampling will be undertaken by trained site staff. It is deemed appropriate for trained site staff to undertake water sampling activities as the frequency for sampling is related to rainfall and/or spills during operational hours. This approach is considered appropriate for mitigation of inherent health and safety risks (water sampling in daylight and with other staff present onsite) and to provide the data necessary to assess surface water management (and leachate management performance (refer also Leachate Management Plan).

Ongoing operations stage

Based on the results of the pre-commissioning and commissioning stages, and with ongoing engagement with the NSW EPA, ResourceCo has undertaken the following amendments to the stormwater management regime.

To ensure the adequacy of site infrastructure in preventing off-site pollution, and review the existing and updated site sampling data, an independent consultant was engaged to complete a comprehensive review of the stormwater management on site as a Stormwater Management Review.

Sampling and analysis were conducted during across 2023 and 2024 calendar years to facilitate the completion of a Stormwater Management Review Report. The report identified the following:

- *Based on review of water quality sampling as outlined in Section 5.1, runoff from the site appears typically similar with that expected from typical urban runoff but with some results warranting further consideration.*
- *Therefore, assessment against the pollutant reduction targets upon which the development consent is based is considered appropriate at this stage whilst further review is undertaken. As outlined in Section 5.2, analysis of available data does not indicate any substantial ongoing performance issues with relation to achieving the reduction targets.*

Table 22 Monitoring frequency – ongoing operations stage.

Location	Frequency
Upstream Site discharge	Based on rainfall experienced, target to complete sampling on average approximately once every 6 months and include larger rainfall events where possible.

The findings of the ongoing operations stage will inform any changes to the site surface water management system (and leachate management system; refer Leachate Management Plan) deemed appropriate for achieving required performance.

After 12 months and again after 24 months, ResourceCo will inform the EPA of the number of samples collected.

Within 3 months after the 24 months, a brief summary report is updated based on updated data and provided to the EPA with comparison of the results to upstream data, ANZG 2018 (95th percentile) default values and the typical urban runoff concentration to further assess the performance of the site's activities with respect to water discharged from the site (S1 and S6).

Spill

Monitoring for spills will occur should there be a spill. The monitoring frequency is listed in below Table 23 on an event basis.

Table 23 Monitoring frequency – spills

Location	Frequency
Upstream Site discharge	On each occasion of the Spill Monitoring Sampling Trigger being activated

This monitoring will primarily assist in assessing any potential site related impacts to downstream surface water conditions.

40.4.2 Methods

Water sampling will be undertaken by trained site staff, at the rainfall and/or spill event-based monitoring frequency, as noted in Section 4.4.1. The following sampling methods will be used by trained site staff for this monitoring program, also to include the quality assurance and quality control (QA/QC) program methods detailed in below Section 0.

- **Collection |** Disposable bailer or grab sampler for sample collection (selected for safe sampling). Samples are to be field filtered as required and immediately placed into laboratory prepared bottles, based on the monitoring analytes/laboratory analyses.
- **Identification/Preservation |** Sample bottles are to be labelled with the task number, sample identification number, sampler and collection time and date. Sample bottles are to be placed immediately into ice-filled coolers for preservation.

- **Custody |** Samples are to be accompanied with completed chain of custody documentation to the analytical laboratory, submitted with consideration for sample holding times and required analyses (e.g., 12 hours maximum holding time from collection to analysis for dissolved sulphide, per Australian Government National Measurement Institute publication no. 17-COM1468).

40.5 Treatment performance benchmarks and investigation

The Development Consent and NSW EPA GTAs generally require the identification of treatment performance benchmarks.

The NSW Department of Planning and Environment approved the development on the basis of pollutant reduction criteria, considering a Triaxial Consulting letter report (dated 6 September 2016) submitted as part of Development Consent Application no. SSD 7256 (File reference no. 15/13400). The Triaxial Consulting letter report includes MUSIC modelling for the development's surface water management approach with pollution control device treatment train (i.e., Humes HumeGard HG18 GPT and Humes JellyFish JF3000-19-4 Filter). This modelling showed the pollution control devices are suitable for meeting Council requirements of pollutant reduction and therefore treatment performance as shown in Table 24.

Table 24 MUSIC Modelling Results (Triaxial Stormwater Addendum Report 6/09/2016)

Pollutant	Reduction Target (%)	Proposed Development Reduction (%)
Total Suspended Solids	85	88
Total Phosphorus	65	66
Total Nitrogen	45	60.7
Gross Pollutants	90	99.3

As such, it is considered appropriate to consider the pollutant reduction criteria as performance benchmarks, with these benchmarks being satisfied through the provision of the proposed treatment train, as demonstrated by the MUSIC modelling.

However, it is not possible to demonstrate compliance with these benchmarks through water quality sampling as this would require monitoring of concentrations and flow rates continuously and instantaneously for all discharges. Furthermore, the NSW EPA GTAs specifically note benchmarks are to be derived with reference to the relevant ANZG (2018) guidelines however the pollutant reduction criteria are not directly comparable to the ANZG (2018) procedures. At this stage insufficient water quality data is available to derive site specific trigger values in accordance with the ANZG procedures, and adoption of default ANZG values is not considered appropriate on the basis that these default values generally represent ambient objectives and not necessarily discharge limits.

In summary, pollution reduction criteria are considered as appropriate benchmarks based on the project approval, however they cannot be monitored and are not directly comparable to the ANZG (2018) procedures that are noted in the EPA GTAs. Insufficient data is currently available to set concentration benchmarks based on the ANZG (2018) procedures.

As such, it is proposed that the satisfaction of the pollutant reduction criteria, as previously demonstrated, supports deferring the derivation of concentration-based benchmarks in accordance with the ANZG guidelines.

During the 2023-2024 calendar years ResourceCo conducted 10 sampling events.

The investigation of surface water management performance (and leachate management performance) is proposed for the ongoing operations stage, to be conducted using the following Investigation Steps should an exceedance in the performance benchmarks be observed:

5. Record occurrence of performance benchmark exceedance.
6. Assess available historical upstream and discharge results for analyte trending and to potentially derive site-specific trigger values.
7. Conduct/record field observations of pollution control devices, qualitatively assess whether any issues identified may have contributed to observed exceedance and perform/enhance maintenance as appropriate.
8. Should there be a consecutive exceedance (observed during subsequent sampling event per monitoring frequency), perform above Investigation Step 3 and consider the need to sample at additional monitoring location ahead of pollution control devices[2] to confirm treatment performance.

The findings of the above investigation should identify the need for potential additional mitigation measures, to be developed in line with below Section 40.6.

40.6 Mitigation

The following ongoing mitigations are proposed following completion of the stormwater monitoring:

- Cleaning and maintenance of StormFilter every 12 months and OceanGuard every 4 months.
- Ongoing review of opportunities to reduce spillage relating to material baling.
- Compliance with plant wide cleaning program (As per schedule kept in MEX work orders), daily street sweeper across hardstand areas of the site and forecourt specific cleaning program.
- ResourceCo has purchased an onsite sweeper to maintain the hardstand areas during daily operations.
- ResourceCo has employed the use of an external street sweeper for regular cleaning of the hardstand area during operation.
- Hydrocarbon management practices include additions to workplace inspections to include clear and regular reviews of:
    - appropriate bunding
    - storage of chemicals;
    - potential for spills; and
    - identification of evidence of spills (and rapid clean up using for example absorbent mats).
- Ongoing observation of incoming vehicles and their potential for, and actual spills including spill containment and cleanup equipment located at the site weighbridge and tipping areas.

[2] Additional monitoring location – side entry pit SEP6 as per drawing TX-11972.00 – C2.2 Issue C, provided as 15.

- Additional monitoring to be undertaken to assess the site's performance with respect to discharged water quality. ResourceCo will provide a summary report of the updated results to EPA following a further 24 months of sampling with a comparison of upstream and downstream results.

40.7 Quality assurance and quality control

A water quality sampling QA/QC program has been implemented. This QA/QC program has been developed with consideration for data quality indicators (DQI) that form the basis of assessing whether the data is of sufficient quality on which to base decisions regarding contamination and performance.

40.7.1 QA/QC program

The QA/QC program consists of field and laboratory quality control as detailed below.

Field quality control

All fieldwork will be conducted using a set of uniform and systematic methods. Key requirements of these procedures are as follows:

- **Training |** Appropriately trained samplers are to document site activities using photographs/notes on standard field forms such as daily site records and sampling logs.
- **Identification/Preservation |** Sample bottles are to be labelled with the task number, sample identification number, sampling technician and collection time and date. Sample bottles are to be placed immediately into ice-filled coolers for preservation.
- **Custody |** Samples are to be accompanied with completed chain of custody documentation to the analytical laboratory, submitted with consideration for sample holding times and required analyses (e.g., 12 hours maximum holding time from collection to analysis for dissolved sulphide, per Australian Government National Measurement Institute publication no. 17-COM1468).
- **Decontamination |** Decontamination procedures are to include the use of new disposable gloves for the collection of each sample, decontamination of the sampling equipment between each sampling location using appropriate decontamination solution and the use of dedicated sampling containers provided by the analytical laboratory; and

Before commencement of a sampling program, training in these field quality control procedures is to be provided by an appropriately qualified and experienced person, with a register of all staff having undertaken the training recorded. All staff undertaking the sampling program are to have undertaken the training. This training would also involve instruction on standard sampling, decontamination, and filtration methods, including guidance on how to avoid zinc contamination which is commonly associated with plastic sampling equipment. Training would also involve instruction on the collection of duplicate and blank samples.

Laboratory quality control

The engaged analytical laboratory will employ National Association of Testing Authorities (NATA) accredited methods in accordance with their quality assurance system. Standard laboratory quality control procedures to be used during the project.

41. Records and reporting

41.1 Reporting

Environmental management records generated will be identified, collected and stored in accordance with ResourceCo's quality management system. Reporting and review will include the following:

- Summary of water quality monitoring results to the EPA as part of Annual Return for EPL and regular reporting to EPA as detailed above.
- Any exceedances from prescribed criteria will be investigated and appropriate action plans developed and implemented.
- Exceedances of EPL conditions will be reported at toolbox or site meetings along with investigations into the cause and any potential actions to prevent reoccurrence.
- A record of all inspections will be kept on file.

41.2 Record keeping

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

43. Review and improvement

43.1 Review of the Water Management Plan

The WMP will be reviewed on a regular basis to ensure that it accurately reflects the ResourceCo EMS and conforms to applicable legislative and other requirements. The frequency of review will be at least annually as part of the OEMP review, or more frequently, as a result of a significant non-conformance or as directed by the Secretary of the Department of Planning and Environment or other authority.

At the conclusion of the review process, any recommendations for change, or improvement, to EMS will be reflected through amendments to the relevant system element including the OEMP, other 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 documentation 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 documentation 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 lists the types of amendments that would be considered minor and major, and the approval process.

Table 25 WMP 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	Minor spill
	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

43.2 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. 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.

44. References

ANZG (2018) '*Australian & New Zealand Guidelines for Fresh & Marine Water Quality*, 2018

Landcom (2004) 'Managing Urban Stormwater: Soils and Construction'

Nexus Environmental Planning Pty Ltd (2016) Environmental Impact Statement titled 'Waste and Resource Management Facility' SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

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

Triaxial Consulting (2016) 35-37 Frank Street, Wetherill Park- Stormwater Addendum Report

GHD (2024) 'Stormwater Management review ResourceCo RRF Pty Ltd' 07 November 2024 | 12588480

Appendices

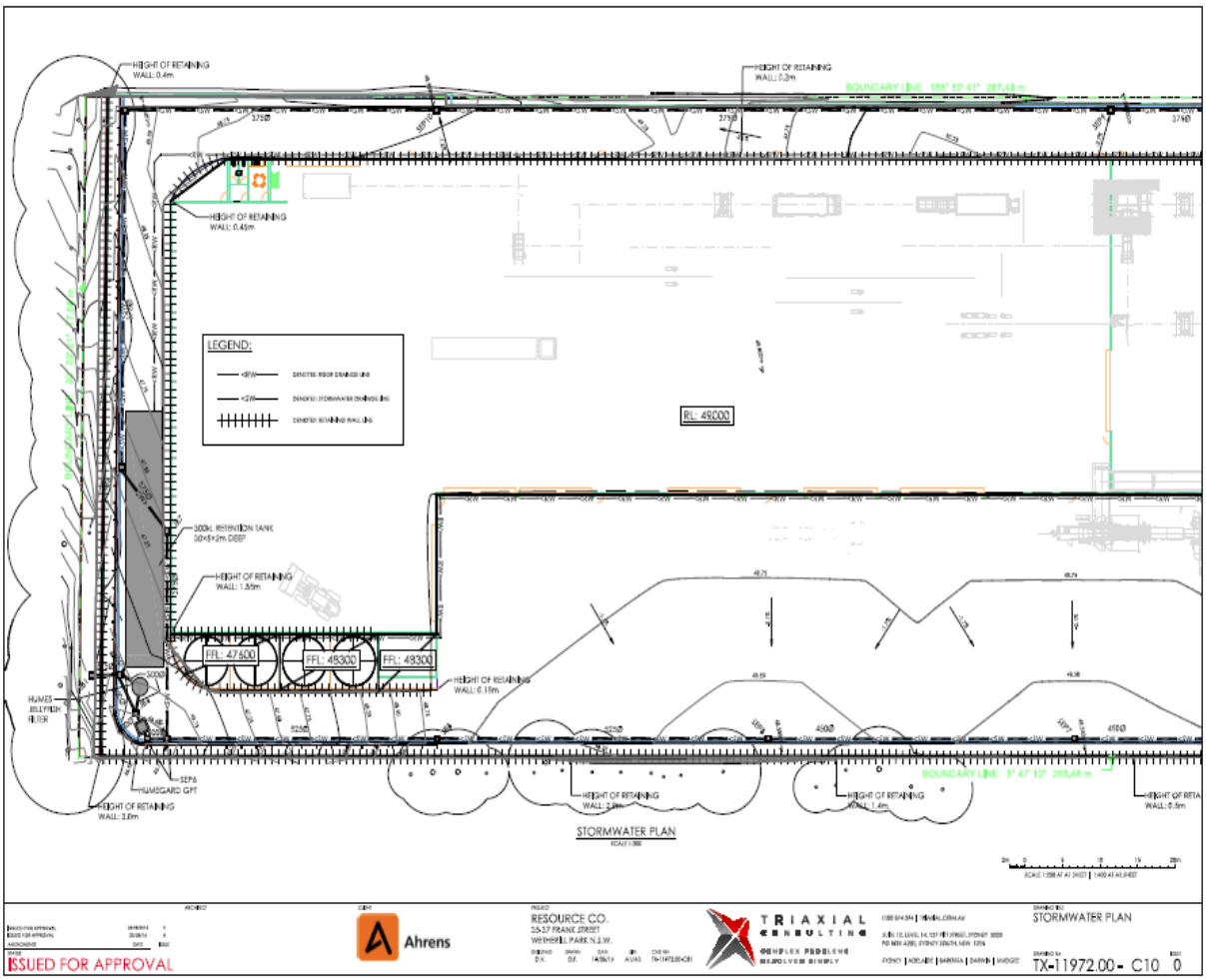
15– Stormwater management plan drawings

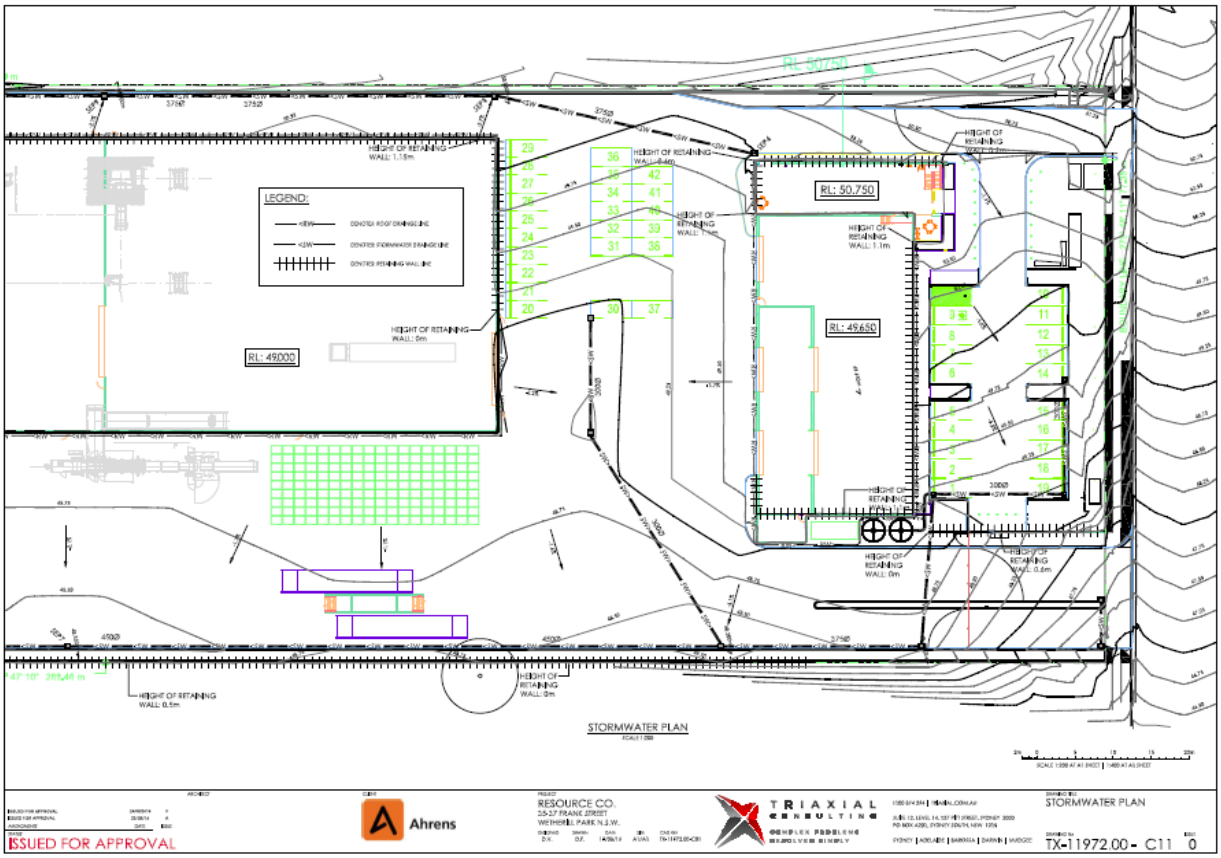
TX-11972.00-C10

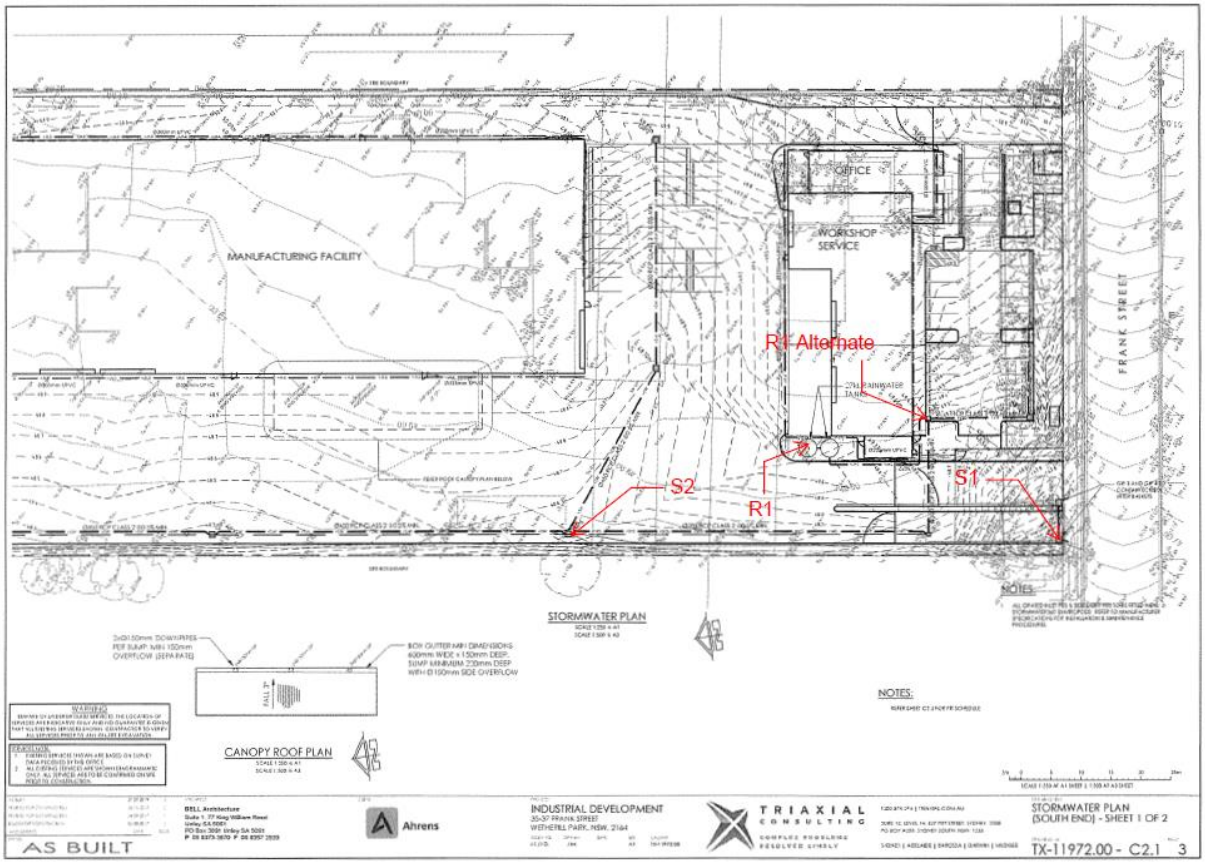
TX-11972.00-C11

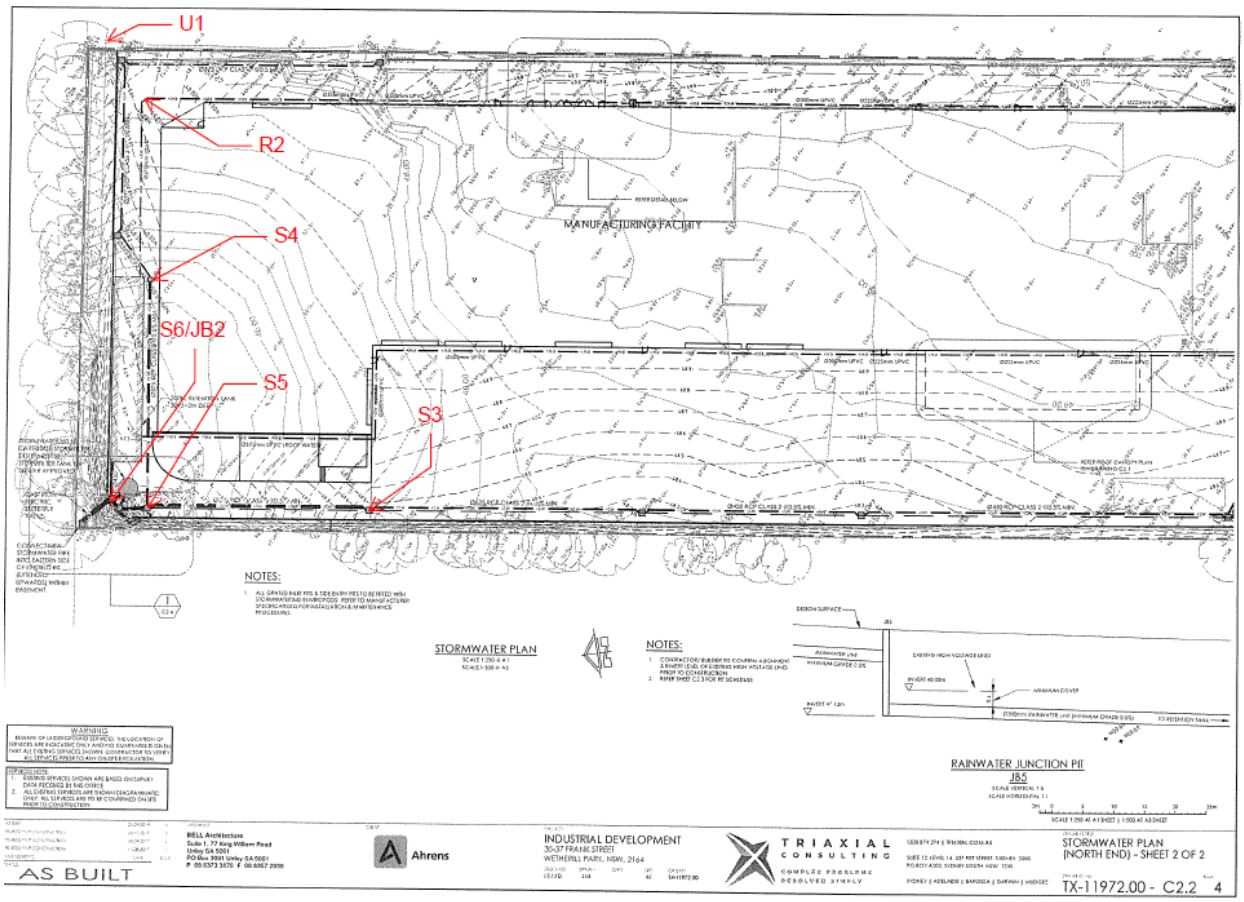
TX-11972.00 – C2.1

TX-11972.00-C2.2




LEGEND:
RL: 49000
RL: 50,750
RL: 49650
STORMWATER PLAN
ISSUED FOR APPROVAL
Ahrens
RESOURCE CO.
35-37 FRANK STREET
WETHERILL PARK N.S.W.
TRIAXIAL CONSULTING
STORMWATER PLAN
TX-11972.00 - C11 0


MANUFACTURING FACILITY
OFFICE
WORKSHOP SERVICE
FRANK STREET
R1 Alternate
S2
R1
S1
STORMWATER PLAN
CANOPY ROOF PLAN
NOTES:
AS BUILT
Ahrens
INDUSTRIAL DEVELOPMENT
35-37 FRANK STREET
WETHERILL PARK, NSW, 2164
TRIAXIAL CONSULTING
STORMWATER PLAN
(SOUTH END) - SHEET 1 OF 2
TX-11972.00 - C2.1 3

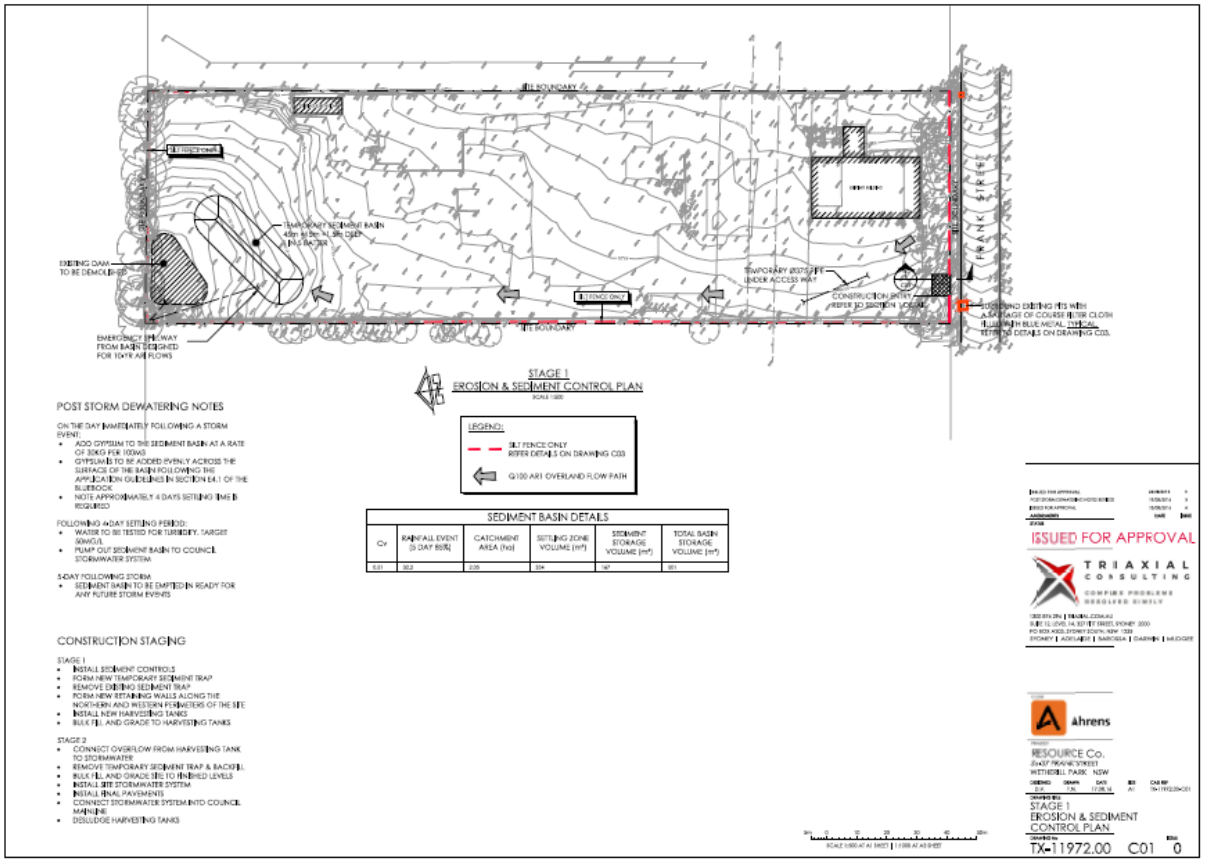

U1
R2
S4
S6/JB2
S5
S3
MANUFACTURING FACILITY
NOTES:
STORMWATER PLAN
NOTES:
RAINWATER JUNCTION PIT
JB5
WARNING
AS BUILT
Ahrens
INDUSTRIAL DEVELOPMENT
36-37 FRANK STREET
WETHERILL PARK, NSW, 2164
TRIAXIAL CONSULTING
STORMWATER PLAN
(NORTH END) - SHEET 2 OF 2
TX-11972.00 - C2.2 4

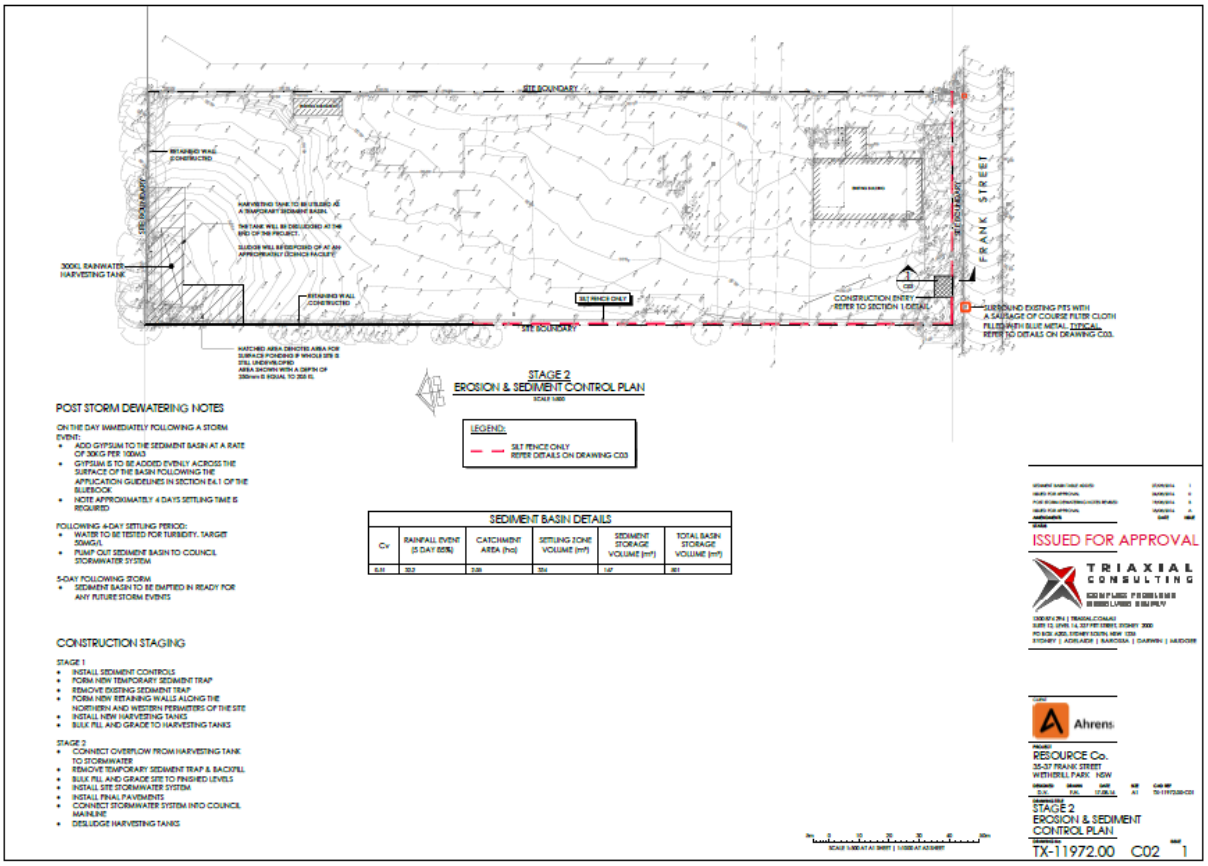
16– Erosion and sediment control plan drawings

TX-11972.00-C01

TX-11972.00-C02

TX-11972.00-C03





POST STORM DEWATERING NOTES

ON THE DAY IMMEDIATELY FOLLOWING A STORM EVENT:

- ADD GYPSUM TO THE SEDIMENT BASIN AT A RATE OF 30KG PER 100M3
- GYPSUM IS TO BE ADDED EVENLY ACROSS THE SURFACE OF THE BASIN FOLLOWING THE APPLICATION GUIDELINES IN SECTION 6.4.1 OF THE BLUEBOOK
- NOTE APPROXIMATELY 4 DAYS SETTLING TIME IS REQUIRED

FOLLOWING 4-DAY SETTLING PERIOD:

- WATER TO BE TESTED FOR TURBIDITY, TARGET 50MG/L
- PUMP OUT SEDIMENT BASIN TO COUNCIL STORMWATER SYSTEM

5-DAY FOLLOWING STORM

- SEDIMENT BASIN TO BE EMPTIED IN READY FOR ANY FUTURE STORM EVENTS

CONSTRUCTION STAGING

STAGE 1

- INSTALL SEDIMENT CONTROLS
- FORM NEW TEMPORARY SEDIMENT TRAP
- REMOVE EXISTING SEDIMENT TRAP
- FORM NEW RETAINING WALLS ALONG THE NORTHERN AND WESTERN PERIMETERS OF THE SITE
- INSTALL NEW HARVESTING TANKS
- BULK FILL AND GRADE TO HARVESTING TANKS

STAGE 2

- CONNECT OVERFLOW FROM HARVESTING TANK TO STORMWATER
- REMOVE TEMPORARY SEDIMENT TRAP & BACKFILL
- BULK FILL AND GRADE SITE TO FINISHED LEVELS
- INSTALL SITE STORMWATER SYSTEM
- INSTALL FINAL PAVEMENTS
- CONNECT STORMWATER SYSTEM INTO COUNCIL MAINLINE
- DESLUDGE HARVESTING TANKS

SEDIMENT BASIN DETAILS

Cv	RAINFALL EVENT (5 DAY 85%)	CATCHMENT AREA (ha)	SETTLING ZONE VOLUME (m³)	SEDIMENT STORAGE VOLUME (m³)	TOTAL BASIN STORAGE VOLUME (m³)
0.30	33.2	0.86	304	147	451

ISSUED FOR APPROVAL

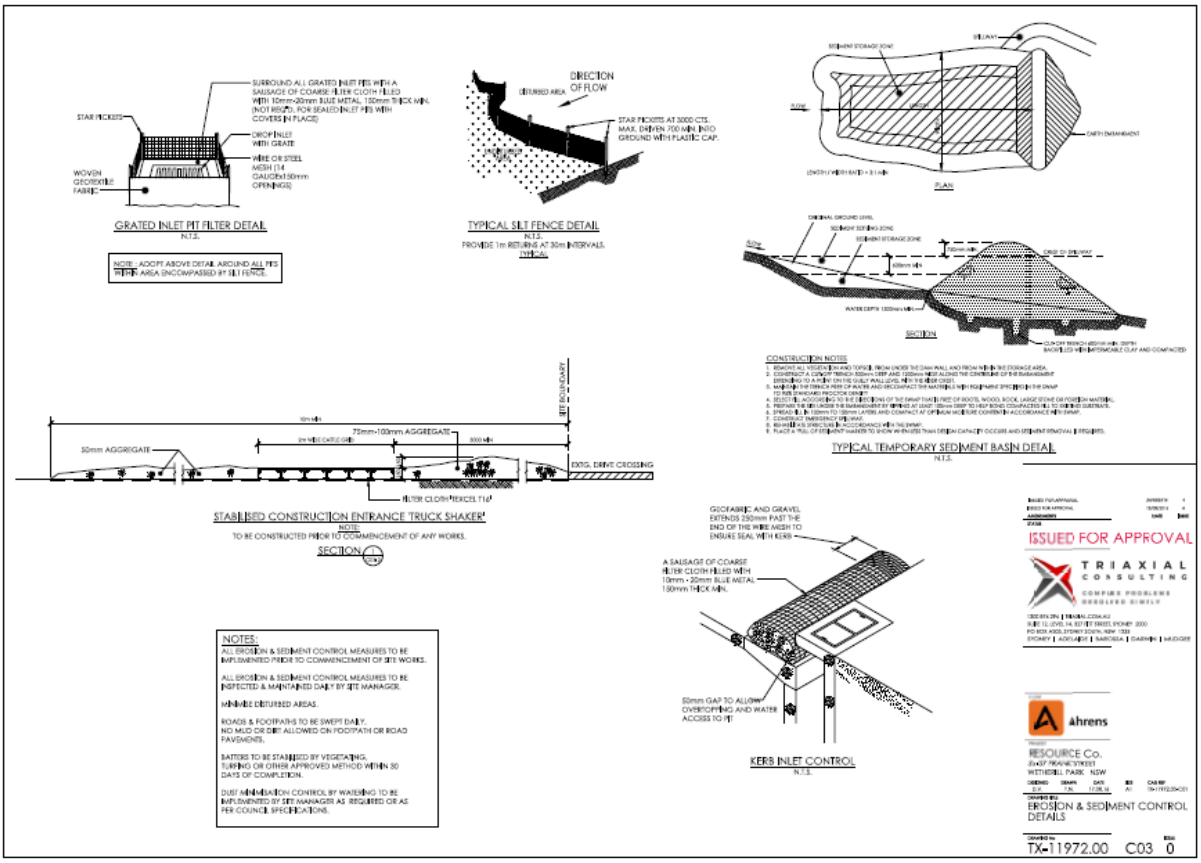
TRIAXIAL CONSULTING

Ahrens

RESOURCE Co.
35-37 FRANK STREET
WETHERILL PARK NSW

STAGE 2
EROSION & SEDIMENT CONTROL PLAN

TX-11972.00 C02 1



NOTES:
ALL EROSION & SEDIMENT CONTROL MEASURES TO BE IMPLEMENTED PRIOR TO COMMENCEMENT OF SITE WORKS.

ALL EROSION & SEDIMENT CONTROL MEASURES TO BE INSPECTED & MAINTAINED DAILY BY SITE MANAGER.

MINIMISE DISTURBED AREAS.

ROADS & FOOTPATHS TO BE SWEPT DAILY. NO MUD OR DIRT ALLOWED ON FOOTPATH OR ROAD PAVEMENTS.

BATTERS TO BE STABILISED BY VEGETATING, TURFING OR OTHER APPROVED METHOD WITHIN 30 DAYS OF COMPLETION.

DUST MINIMISATION CONTROL BY WATERING TO BE IMPLEMENTED BY SITE MANAGER AS REQUIRED OR AS PER COUNCIL SPECIFICATIONS.

ISSUED FOR APPROVAL

TRIAXIAL CONSULTING

Ahrens

RESOURCE Co.
35-37 FRANK STREET
WETHERILL PARK NSW

EROSION & SEDIMENT CONTROL DETAILS

TX-11972.00 C03 0

Appendix N – Leachate Management Plan

ResourceCo RRF Pty Ltd

Leachate Management Plan

Wetherill Park RRF

July 2025

45. Document Information

The following table contains administrative metadata.

Instructional material owner;	HSEQ Manager
Document ID:	CR-MP005
Review Date:	January 2025
Review Due:	January 2026

Version History

The following table details the published date and amendment details for this document.

Date Published	Version Detail	Reason for issue of amendments	Author or Document Owner (Program)
12 March 2018	3	Approval by DPE 18/03/2018	GHD
March 2023	4	Update after IEA and OEMP audit. Update site data.	Gary Salway
January 2025	5	Update following rebranding	Ben Whitehouse

Table of contents

Table index

Figure index

Appendices

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
C&D	Construction and demolition
Construction and Demolition Waste	Waste arising from commercial or industrial premises, refurbishments and demolition and construction work
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
EPA	Environment Protection Authority
EPL	Environment Protection Licence issued by the EPA under the POEO Act
Load	the quantity of waste material delivered to the stockpile by truck, bin, or trailer
Minister	Minister for Planning (or delegate)
NATA	National Association of Testing Authorities
OEMP	Operational Environmental Management Plan
Operation	The receipt, removal, or processing of waste
Particulates; Particulate Matter (PM_{10})	A criteria air pollutant. Particulate matter includes dust, soot and other tiny bits of solid materials that are released into and move around in the air. Particulates are produced by many sources, including burning of diesel fuels by trucks and buses, incineration of garbage, mixing and application of fertilizers and pesticides, road construction, industrial processes such as steel making, mining operations, agricultural burning (field and slash burning), and operation of fireplaces and woodstoves. Particulate pollution can cause eye, nose and throat irritation and other health problems.
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
PM_{10}/$PM_{2.5}$	PM_{10} is measure of particles in the atmosphere with a diameter of less than 10 or equal to a nominal 10 micrometres. $PM_{2.5}$ is a measure of smaller particles in the air.
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
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
Waste	As defined in the POEO Act and includes any materials receive or processed on the site

46. Introduction

46.1 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 Leachate Management Plan (LMP) is one of a suite of plans that governs the operation of the facility.

46.2 Purpose

This LMP has been developed to:

- Detail the proposed leachate management for the facility.
- Outline the monitoring program designed to determine the performance of the leachate management system.

The LMP provides an overall framework for leachate and fire water management during operation. It has been developed to satisfy the requirements of:

- Condition B21 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.

46.3 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 42 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

46.4 Environmental management system

46.4.1 ResourceCo corporate EMS

This LMP 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.

46.4.2 Wetherill Park Resource Recovery Facility OEMP

This LMP is a sub-plan to the Wetherill Park Resource Recovery Facility Operational Environmental Management Plan (OEMP). The OEMP is based on the ISO14001 Environmental Management System, which provides for continual improvement in environmental performance.

The OEMP is intended as an over-arching environmental management document that forms the basis for development of detailed sub plans (such as this) and procedures for managing specific environmental aspects and impacts. It 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 this document within the OEMP document framework is illustrated in Figure 1.

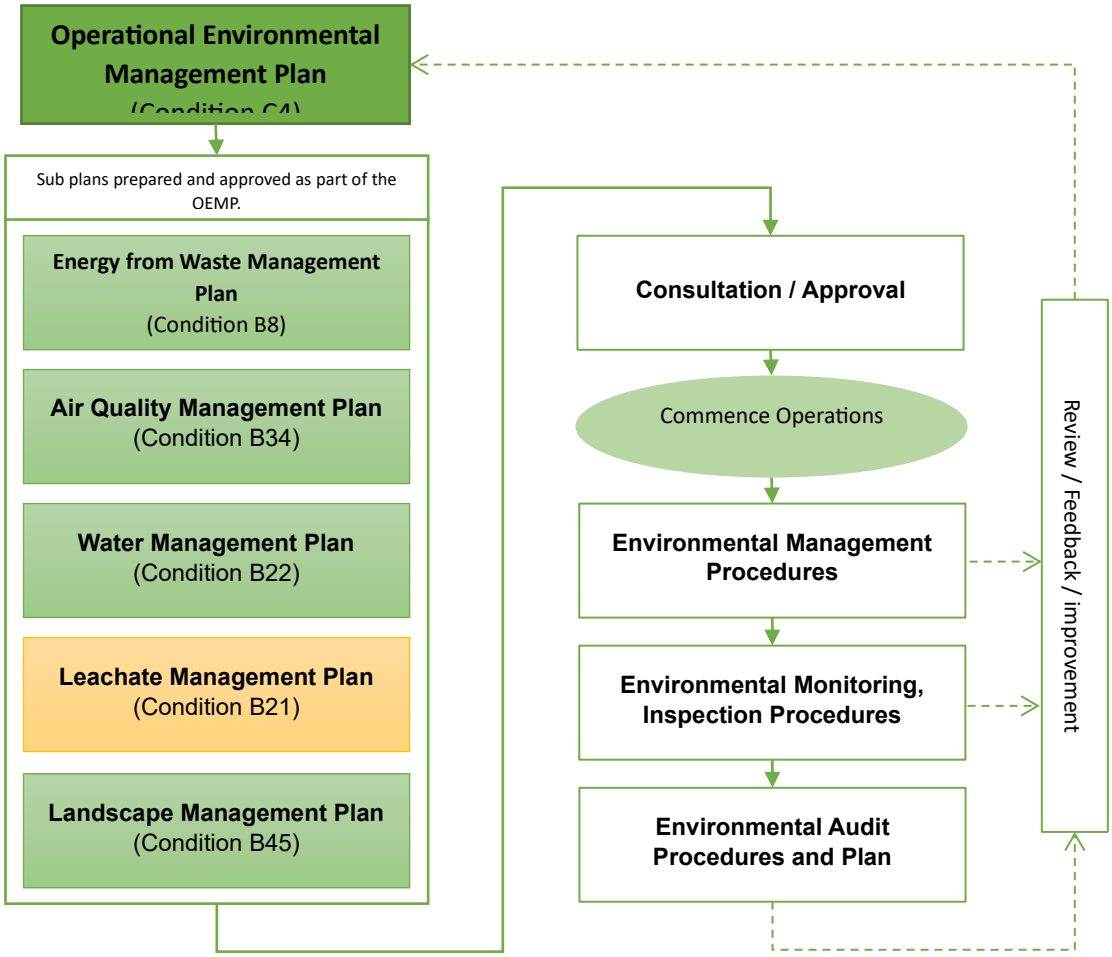


Figure 10 Opérationnel Environmental management document structure

46.4.3 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 (including this plan) 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.

46.4.4 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 LMP 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.

46.5 Consultation and approval process

46.5.1 LMP compliance with the Conditions of Approval

Table 2 lists the key requirements of Condition B21 and indicates where these requirements are addressed within this LMP or other documents.

Table 26 Conditions of Approval requirements

Condition requirements	Response/reference
Condition B21	
Prior to the commencement of operations, the Applicant must prepare a Leachate Management Plan for the management of leachate and firewater at the site, including any possible leachate generated around the baling and wrapping area. The leachate system must:	
(a) be designed by a suitably qualified and experienced person(s) in consultation with FRNSW	Design provided by Triaxial Consulting. Refer Section 46.5.2 and Section 47.
(b) provide a management protocol for leachate and firewater	Section 48
(c) control leachate and firewater so that they do not mix with any stormwater on the site	Section 48
(d) include water quality monitoring to determine the performance of the leachate management system	Section 32

46.5.2 Consultation and approval

In accordance with Condition B21, the leachate system is required to be prepared in consultation with Fire and Rescue NSW.

Fire and Rescue NSW has been consulted with vie email and telephone during the development of the proposed fire management system and design for the facility. Fire and Rescue NSW provided input with respect to requirements for maximum sizes of stockpiles and separation of stockpiles, requirements for fire hydrant water supply and other provisions for firefighting.

A draft version of this document was sent to Fire and Rescue NSW for review and comment. Fire and Rescue NSW provided a response (**Error! Reference source not found.**) which indicated that it is satisfied with the Leachate Management Plan as provided.

47. Proposed leachate and fire water management system.

Drawing TX-11972.00-C4.2 (**Error! Reference source not found.**) shows the design o f the leachate and fire water management system within the manufacturing building.

In accordance with Building Code of Australia and AS 2118 requirements, sufficient detention is provided within the building for 90 minutes of fire sprinklers active time in both the main facility area and the PEF storage area.

Drawing TX-11972.00-C4.2 (**Error! Reference source not found.**) provides the d etention calculations for the fire sprinkler system within the manufacturing building. It demonstrates that sufficient detention volume is provided within the graded floor of the building and concrete valley to contain the fire water from 90 minutes of fire sprinklers active time.

The design includes a graded floor so that fire water will run to the proposed concrete valley and pond on the floor of the building. 496 m^3 of retention volume with 200 mm freeboard is provided with this arrangement to contain leachate and fire water.

48. Management protocol for leachate and fire water

48.1 Fire water containment

In the event of a fire event within the building, the building design has been designed to cater for the containment of potentially contaminated fire services water within the building. This is discussed in Section 47 and shown in Drawing TX-11972.00-C4.2 (**Error! Reference source not found.**). Sufficient detention volume is provided within t he graded floor of the building and concrete valley to contain the fire water from 90 minutes of fire sprinklers active time (496 m^3 with 200 mm freeboard).

Should a significant fire occur in the unbaled PEF or raw stockpiled materials, in accordance with Fire and Rescue NSW requirements, the affected pile(s) may need to be spread out using the wheel loaders on site to achieve full extinguishment (irrespective of sprinkler system activation and control) by direct handheld hose lines. The concrete areas of the site will be used for this purpose – most likely between the weighbridge and the northern end of the manufacturing building.

In order to contain fire services water onsite in the event that this stockpile fire protocol is required to be implemented, a shut off valve will be installed in the 675 mm site stormwater discharge to the 900 mm stormwater pipe. This will prevent fire water entering the stormwater pipe. The valve will be automated and will automatically close when the firefighting sprinkler system is activated. Upon activation, the shut off valve will be checked to ensure that it has closed, and if for any reason the shut off valve doesn't close automatically, then the valve will be manually closed. The valve will only be able to be manually re-opened to allow water discharge after this is sequenced.

Contained contaminated fire services water will be removed from the site by vacuum truck and disposed of at a suitably licenced facility.

48.2 Leachate management

The waste materials received into the site will be dry in nature and will all be stored under cover in the manufacturing building. There will be no waste materials stored outside. In the rare instance that materials received into the manufacturing process release leachates, for example if a non-conforming load of wet waste is delivered, the design of the receiving slab levels grades to a concrete valley within the receiving area which will contain leachate.

The low spots will be emptied via vacuum trucks and any leachates removed from the site to an appropriately licensed disposal facility as required.

In the event that a significant leachate spill occurs outside the manufacturing building, the stormwater shut off valve is to be manually closed to prevent leachate entering the stormwater pipe. Contained leachate will be removed from the site by vacuum truck and disposed of at a suitably licenced facility.

49. Monitoring and evaluation

This section outlines the program that will be implemented to evaluate the performance of the facility operation and determine compliance with key performance indicators.

49.1 Key performance indicators/targets

The key performance indicators/targets for the proposed leachate and fire water controls are:

- All collected leachate is removed to an appropriately licenced disposal facility.
- Leachate is not to mix with stormwater on site.
- Fire water is not to mix with stormwater on site.
- No exceedances of EPL conditions for water quality

49.2 Monitoring

The site monitoring for leachate management performance is detailed in the Water Management Plan and summarised herein.

The overall site leachate management comprises waste receipt/storage under cover (inside building), dry sumps leachate capture, and approved disposal. Potential impacts from leachate would be unlikely (no operations outside building) and generally only conveyed to downstream surface water during rainfall events. Leachate generated or received on site (e.g., wet waste containing pollutants) is designed to be contained by the site leachate management measures. In the event of an overflow (or spill) of leachate from the leachate management or operations spill (e.g., diesel fuel or oil), the leachate would be contained per the protocol noted in above Section 48, though leachate-impacted water may flow to the site surface water management system. As such, monitoring conducted to assess the site surface water discharge with site-specific leachate analytes (refer Water Management Plan) is deemed appropriate for assessing leachate management performance.

The monitoring locations for the site are proposed based on the site surface water management system, providing data for assessment of leachate management performance. These locations characterise the majority of site runoff (approximately 98%), are listed below and are shown on drawing TX-11972.00 – C2.2 Issue C, provided as **Error! Reference source not found.**.

- **Upstream**–within drainage easement at point JB1 (sampled upstream of the location where site runoff enters the easement pipe).
- **Site discharge** –within junction box ahead of JB1 to sample all runoff discharged from the site at this location

The monitoring of water quality for the clean rainfall runoff (approximately 2%) from the southwest corner of the property is not deemed required based on the small catchment of this area and lower quality risk posed by this area.

Should the water quality findings indicate analyte concentrations consistently at less than 50 percent of the site performance benchmarks (refer Water Management Plan) or less than the limit of reporting, discontinuing sampling for the analyte may be warranted.

With regard to monitoring of surface water flow rates and volumes, runoff from the site is conveyed by gravity to the area 900 mm stormwater drainage easement. As such, the direct measurement of this flow rate is not practicable. The site staff will collect as appropriate rainfall records for the applicable to the area. Using these records and if required by the NSW EPA, calculations of estimated volume discharged from the site could be performed.

As detailed in the Water Management Plan, the monitoring frequency includes rainfall event and spill event triggered sampling by trained site staff following also a quality assurance and quality control program during pre-commissioning, commissioning, and ongoing operations stages. The water quality sampling results collected during the pre-commissioning and commissioning stages of monitoring would be used along with reference to the ANZECC guidelines to derive the performance benchmarks for use during the ongoing operations stage. These benchmarks would provide water quality analysis triggers for further investigation of site performance during the operations stage.

The investigation findings will identify the potential need for further investigation and/or mitigation and assist in leachate management including the prevention of contamination of surface water to minimise potential impacts to downstream flow conditions.

50. Records and reporting

Environmental management records generated will be identified, collected and stored in accordance with ResourceCo's quality management system. Reporting and review will include the following:

- 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

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

51. Review and improvement

51.1 Review of the Leachate Management Plan

The LMP will be reviewed on a regular basis to ensure that it accurately reflects the ResourceCo EMS and conforms to applicable legislative and other requirements. The frequency of review will be at least annually as part of the OEMP review, or more frequently, as a result of a significant non-conformance or as directed by the Secretary of the Department of Planning and Environment or other authority.

At the conclusion of the review process, any recommendations for change, or improvement, to EMS will be reflected through amendments to the relevant system element including the OEMP, other 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 documentation 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 documentation 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 lists the types of amendments that would be considered minor and major, and the approval process.

Table 27 LMP 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	Contained leachate spill
	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

51.2 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. 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.

52. References

Nexus Environmental Planning Pty Ltd (2016) Environmental Impact Statement titled ‘Waste and Resource Management Facility’ SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

Nexus Environmental Planning Pty Ltd (2016) Response to Submissions titled ‘Response to Submissions Waste and Resource Management Facility’ SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

Appendix O – Landscape Management Plan

ResourceCo RRF Pty Ltd

Landscape Management Plan

Wetherill Park RRF

July 2025

53. Document Information

The following table contains administrative metadata.

Instructional material owner;	HSEQ Manager
Document ID:	CR-MP006
Review Date:	January 2026

Version History

The following table details the published date and amendment details for this document.

Date Published	Version Detail	Reason for issue of amendments	Author or Document Owner (Program)
22 February 2018	1	Approval by DPE	GHD
March 2023	2	Update after IEA and OEMP audit. Update site data.	Gary Salway
January 2025	3	Update after re-branding	Ben Whitehouse

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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
C&D	Construction and demolition
Construction and Demolition Waste	Waste arising from commercial or industrial premises, refurbishments and demolition and construction work
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
EPA	Environment Protection Authority
EPL	Environment Protection Licence issued by the EPA under the POEO Act
Load	the quantity of waste material delivered to the stockpile by truck, bin, or trailer
Minister	Minister for Planning (or delegate)
NATA	National Association of Testing Authorities
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
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
Waste	As defined in the POEO Act and includes any materials receive or processed on the site

54. Introduction

54.1 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 Landscape Management Plan is one of a suite of plans that governs the operation of the facility.

54.2 Purpose

This Landscape Management Plan has been developed to:

- Provide details of the landscaping works on site
- Describe the monitoring and maintenance measures to manage revegetation and landscaping works.

The Landscape Management Plan provides an overall framework for landscape management during operation. It has been developed to satisfy the requirements of:

- Condition B45 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.

54.3 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 42 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

54.4 Environmental management system

54.4.1 ResourceCo corporate EMS

This Landscape Management Plan 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.

54.4.2 Wetherill Park Resource Recovery Facility OEMP

This Landscape Management Plan is a sub-plan to the Wetherill Park Resource Recovery Facility Operational Environmental Management Plan (OEMP). The OEMP is based on the ISO14001 Environmental Management System, which provides for continual improvement in environmental performance.

The OEMP is intended as an over-arching environmental management document that forms the basis for development of detailed sub plans (such as this) and procedures for managing specific environmental aspects and impacts. It 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 this document within the OEMP document framework is illustrated in Figure 1.

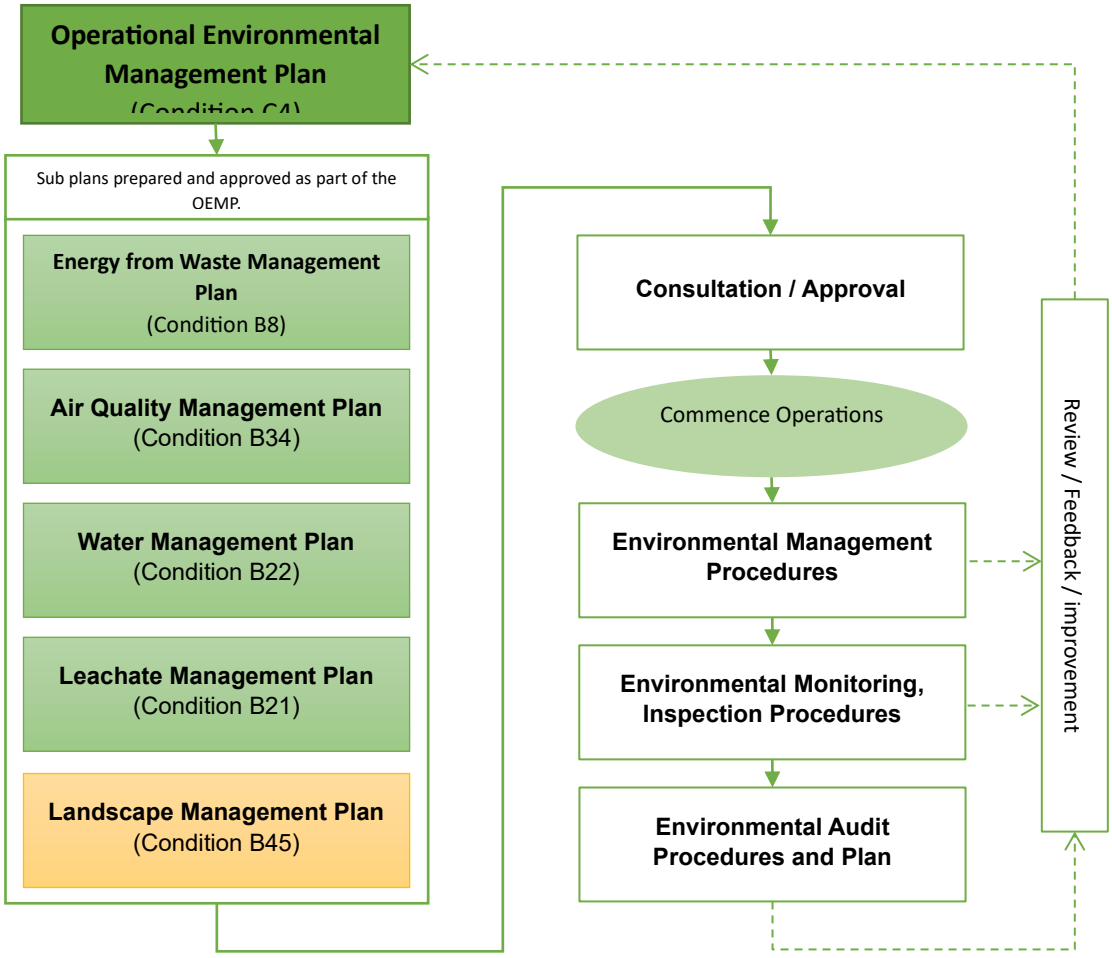

Figure 11 Operational environmental management document structure

54.4.3 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 (including this plan) 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.

54.4.4 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 Landscape Management Plan 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.

54.5 Consultation and approval process

54.5.1 Landscape Management Plan compliance with the Conditions of Approval

Table 2 lists the key requirements of Condition B45 and indicates where these requirements are addressed within this Landscape Management Plan or other documents.

Table 28 Conditions of Approval requirements

Condition requirements	Response/reference
Condition B45	
Prior to the commencement of operations, the Applicant must prepare a Landscape Management Plan to manage the landscaping works on-site to the satisfaction of the Secretary. The plan must form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The plan must:	Section 54.5.2
(a) describe the species to be planted on-site	Section 58.2
(b) describe the monitoring and maintenance to manage revegetation and landscaping works	Section 59
(c) be consistent with the Applicants Management and Mitigation Measures in Appendix 2	Landscaping works/plans referred to in this plan are consistent with the Tree management commitment in the Management and Mitigation Measures

54.5.2 Consultation and approval

In accordance with Condition B45, this Landscape Management Plan is required to be prepared to the satisfaction of the Secretary of the Department of Planning and Environment.

56. Existing landscaping and vegetation

There is no vegetation located on the main part of the site, however there is some vegetation located at the Frank Street frontage of the site. The existing landscape character to this frontage is poor and currently comprised of only turf and various tree species in relatively modest condition.

58. Proposed landscaping.

58.1 Landscape design/plans

A landscape plan has been developed to create a quality landscaped area in the Frank Street streetscape, which will also assist with improving the visual appeal of the facility.

17 trees in relatively poor condition will be removed to accommodate new hardscape areas and subsequent earthworks and new vegetation plantings.

58.2 Species to be planted.

Detailed landscape plans are provided in **Error! Reference source not found.**. These a lso provide information on the species to be planted on-site in the Plant Schedule on Drawing 0215-0954 LD 200. Species to be planted include:

- Spotted Gum
- London Plan
- Orange Jessamine
- Indian Hawthorn
- Lomandra Verday
- Liriope Just Right
- Sapphire Buffalo

59. Monitoring, maintenance measures and evaluation

This section outlines the program that will be implemented to evaluate the landscape management plan and determine compliance with key performance indicators.

59.1.1 Key performance indicators/targets

The performance indicators/targets are:

- Landscaping and vegetation maintained in accordance with the Landscape Design (**Error! Reference source not found.**)
- No weeds on site

59.1.2 Monitoring and maintenance

Table 17 provides a summary of the monitoring and maintenance measures to manage revegetation and landscaping works.

Table 29 Summary of landscape monitoring and maintenance measures

Monitoring and maintenance activity	Frequency
Landscape watering and maintenance	Seasonally - as required
Periodic checks of landscaping areas to assess degree of weed infestation, health of planted trees, shrubs and grasses and the presence of appropriate erosion and sedimentation controls	6 monthly
Weed control	Yearly as a minimum

60. Records and reporting

Environmental management records generated will be identified, collected, and stored in accordance with ResourceCo's quality management system. Reporting and review will include the following:

- 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.

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

62. Review and improvement

62.1 Review of the Landscape Management Plan

The Landscape Management Plan will be reviewed on a regular basis to ensure that it accurately reflects the ResourceCo EMS and conforms to applicable legislative and other requirements. The frequency of review will be at least annually as part of the OEMP review, or more frequently, as a result of a significant non-conformance or as directed by the Secretary of the Department of Planning and Environment or other authority.

At the conclusion of the review process, any recommendations for change, or improvement, to EMS will be reflected through amendments to the relevant system element including the OEMP, other 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 documentation will be approved 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 documentation 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 lists the types of amendments that would be considered minor and major, and the approval process.

Table 30 Landscape Management Plan 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	Poor weed control
	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

62.2 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. 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.

63. References

Nexus Environmental Planning Pty Ltd (2016) Environmental Impact Statement titled ‘Waste and Resource Management Facility’ SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

Nexus Environmental Planning Pty Ltd (2016) Response to Submissions titled ‘Response to Submissions Waste and Resource Management Facility’ SSD 15-7256, ResourceCo Pty Ltd, 35-37 Frank Street, Wetherill Park

Tract Consultants (2016) 35-37 Frank Street, Wetherill Park- Landscape design Statement

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

https://resourceco.lbcdn.io/uploads/2025/01/CR-MP007-Emergency-Plan-incorporating-Pollution-Incident-Response-plan-V1-08.01.2025.pdf

Appendix Q – Environmental Complaints Procedure (PROC 9.1)

STANDARD OPERATING PROCEDURE

1. ENVIRONMENTAL COMPLAINTS PROCEDURE - NSW

Purpose

The purpose of this procedure is to ensure that all complaints received are handled in a manner which is fair, courteous, and respects the privacy of the person making the complaint.

Scope

This procedure is to be used when handling complaints received by ResourceCo's Wetherill Park Resource Recovery Facility (RRF).

References

NSW Protection of the Environment Operations Act 1997

Definitions

Nil

Responsibilities

The HR Department is responsible for overseeing the process of reporting the complaint, the progress of the complaint and any subsequent actions or responses, including completion of CAR's or Incident Reports.

Environmental Obligations

Complaints relating to ResourceCo's Wetherill Park Resource Recovery Facility (RRF) will be received through a variety of ways, including through NSW EPA, local council, local Member of Parliament, or directly from the public. The approach to complaints will be:

- 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 (REG 10). The Complaints Register (REG 10) will be retained on site.
- Where a complaint is received verbally, all information, including name, contact details and nature of complaint is to be recorded on FORM 2 *Incident Report Form*.
- All complaints will be bought to the attention of the Environmental Officer immediately.

Complaint Resolution

Resolution of Environmental Complaints will occur in a timely manner in accordance with Figure 1. Complaints Resolution Flow Chart.

A detailed investigation is to be undertaken as per PROC 12 *Incident Reporting and Investigation.*

Public Relations

No person should approach or respond to media enquiries, except as specifically detailed in POL 12 – Media Policy.

Documentation

FORM 1	Corrective Action Request
FORM 2	Incident Report
POL 12	Media Policy
PROC 12	Incident Report and Investigation
REG 10	Complaints Register

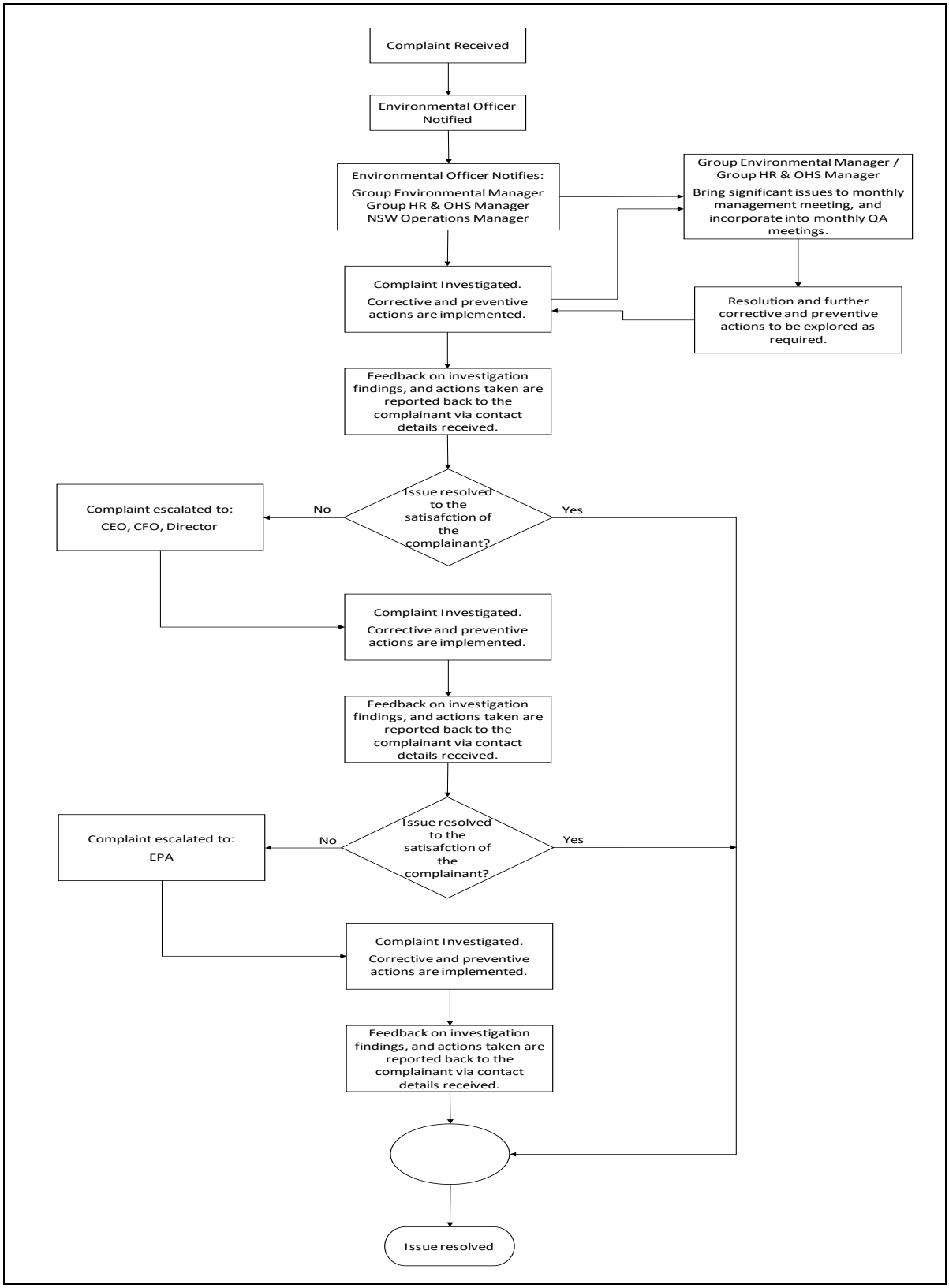

Figure 1. Complaints Resolution Flow Chart

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

PROC 12 - INCIDENT REPORTING & INVESTIGATION PROCEDURE – ResourceCo Group

PROC 12 | VERSION 2 | 29.11.21 **THIS DOCUMENT IS UNCONTROLLED ONCE PRINTED**

Overview of Incident Investigation Process

Secure Evidence
Minimize Impact
Report
Set Objectives
Establish Procedures
Select and train investigators
Prepare investigation Kit
Incident

- • Select Team
- • Review Preliminary data
- • Develop terms of reference

Initiate Investigation
Collect Evidence

- • Review evidence
- • Visit location of incident
- • Conduct interviews
- • Conduct test...etc
- • Analyze events

Immediate causes
Sequence of events
Research additional evidence
Interview witness/Experts

- • Prepare report
- • Review report
- • Implement actions

Actions implementation
Incident Report
Causal analysis
Recommendations

- • Find Root causes using 5 Whys
- • Interpret human factors
- • Identify system failures
- • Develop recommendations

- • Develop incident timelines
- • Ascertain immediate causes
- • Develop immediate actions

- • Review similar incidents
- • Share Lessons Learnt

Share key learnings

PROCEDURE – ResourceCo Group

PROC 12 | VERSION 2 | 29.11.21 **THIS DOCUMENT IS UNCONTROLLED ONCE PRINTED**

Incident
WHSQ Manager discuss with CEO it needs to be escalated; high or extreme (**above 16**)
Report incident on Skytrust within **24 hours** and inform your supervisor immediately who shall then inform the WHSQ Manager immediately
If yes
WHSQ Manager to inform CMT (Legal, CEO and CFO) by phone call then email
CMT to determine if it is crisis and involve CMP
Notifiable incident?
If yes
EPA: Environment Manager
State / Territory Worksafe Authority: WHSQ Manager
All other regulators: Operations Manager
Engage **legal team** and get **CEO** approval prior to formal notification
Do not disturb the scene of the incident until otherwise directed by **the regulator**
Next of Kin
HR Manager or employee senior manager
If the actual or potential severity level of High or Extreme
(WHSQ Manager is the lead investigator)
If the actual or potential severity level of low or moderate
(Site Supervisor is the lead investigator)
Issue full incident investigation report within 7 days
Issue full incident investigation report within 14 days
Implement
Review
Investigate
High Potential (HIPO)
Please
Safety Alert to be issued by **WHSQ Manager** and circulated to all sites
Any NCR/OFI?
If yes
(Send to Risk Committee for review and approval)
Sign off, approval and closeout by **CEO**
Please refer to the hierarchy of control when adding the control measure to mitigate the risk

Hierarchy of Control PROCEDURE – ResourceCo Group

High Potential (HIPO)

1. Secure immediate Risks
2. Emergency Response
3. Preserve scene
4. Drug and Alcohol testing

Immediate Scene Management
Notification protocols undertaken through line of communication (WHSQ Manager to discuss with CEO then inform CMT (Legal, CEO and CFO) by phone call within **an hour,** CMT will determine if it is Crisis within **30 minutes** and involve CMP

- • Initial report in Skytrust within **24 hours**
- • CEO briefing to staff (as required) within **3 days**
- • Distribution of WHSE Alert within **15 days**
- • HPI investigation presented to ELT/Board/H&S Committee (HPI report Template)

- • **24 hours** Preliminary Investigation findings are communicated with CEO, Operations, WHSQ Managers and Legal Counsel (**HPI Report template**)
- • Investigation (including agreed preventative/corrective actions) finalized and entered in Skytrust within **14 days**
- • Agreed preventative/corrective action plan implemented by dedicated implementation team within **one month**

Verification audit undertaken **after one month**
Assurance
Reporting, communication and sharing learnings
Escalation and notification

PROC 12 - INCIDENT REPORTING & INVESTIGATION

ResourceCo values all workers that contribute to the success of the business. Henceforth, the term "workers" will be used to define any employee, contractor or labour hire person who is 'working' for ResourceCo in some capacity.

PURPOSE AND SCOPE

To ensure that all incidents of personal injury, property damage, non-conformance, non-compliance, Hazard ID's and associated near misses that occur at ResourceCo, are reported and or escalated to the appropriate personnel in a timely manner.

Furthermore, the procedure outlines the steps to be taken to investigate these types of incidents to ensure that all relevant facts and contributing factors are established and subsequent corrective actions are documented and implemented to prevent reoccurrence in accordance with the company's best practice ethos, consultation with Health and Safety Committee (HSC) and reporting of Notifiable Incidents.

The procedure will also reinforce the expectations of the Emergency Response Procedure & the Crisis Management Plan, specifically the recognition & escalation of incidents that may result in a crisis and the associated protocols for advising Crisis Leaders.

RESPONSIBILITIES

All Workers in accordance with their **WHSQ/OHS** responsibilities are required to report all incidents, near misses, non-conformances and complaints, to their immediate supervisor and or delegate in the first instance, subject to any first aid or emergency preparedness obligations. All workers should preserve the incident scene and cooperate with the investigation team by providing all relevant information and witness statement if requested.

The **WHSQ Manager (or equivalent)** has responsibility for:

- • Ensuring that managers and supervisors are trained in this procedure and that training records are kept.
- • Participating in the investigation process and reviewing and approving corrective actions.
- • Reporting incidents that have an actual or potential severity of major or severe in the first instance to the Crisis Team Leaders (Relevant Business CEO, group CFO & Legal Counsel) and where appropriate to the remainder of the Executive Management team.
- • Notifying the State / Territory Worksafe Authority where required.

The **Line Manager and or delegate** has responsibility for raising initial incident reports (Initial Notification of Incident (INI)), determining initial & residual risk ratings, participating in the investigation process and raising corresponding corrective actions via the NCR & OFI functions on Skytrust.

The **Line Manager** has responsibility for:

- • Ensuring that appropriate staff are trained in this procedure and that training records are kept.

- • Ensuring incidents are reported, investigations including; garnering and collating of evidence, root cause analysis (5 Whys) are conducted to identify any relevant contributing factors are determined and that corrective and preventive actions are implemented and their effectiveness monitored.

The **QA Management Team** has accountability for reviewing and distributing **Health/Safety/Environment/Quality Alerts** as well as reviewing and approving corrective actions including resource allocation where applicable.

Incident Reporting Process

Personal injuries, Medical Emergencies and Evacuation, Loss of Containment, Environmental spills/releases, Motor Vehicle Accidents, Property Damage, Occupational illness, Security related incidents, Business Travel related incidents, Hazard ID's and High Potential near misses are collectively referred to in this procedure as "incidents".

Initial Incident Response

When an incident has been identified or has the potential to cause an adverse outcome, the first priority is to make the area/person safe and initiate appropriate emergency response procedures. Reporting an incident should not delay **any immediate practical response** to the incident. The **integrity/preservation** of the site should be maintained until such time as the immediate area involved in the incident has been cleared by the **investigation authority**. The site should be preserved and reported immediately if it is a Notifiable Incident.

Refer to site specific *Emergency Preparedness* for detailed emergency responses.

If the Incident is or has the potential to become a crisis see (Appendix 1) then the Crisis Management Leaders (CEO, CFO, Legal Counsel) should be notified ASAP once the emergency is at a managed level and the Crisis Management Plan activated in conjunction with this procedure.

Incidents involving a vehicle and or property damage may require the operator to undergo a for cause Drug & alcohol testing as per PROC 15 Substance Misuse Policy and Procedure.

All Workers-Initial Incident Report

Incidents must be reported immediately (in Skytrust within 24 hours) to your supervisor/manager and the WHSQ Manager (or equivalent) (hereafter referred to as ***supervisor***).

Person involved in incident

Enter initial details of the incident by filling out ResourceCo's Incident Report on Skytrust (Including date, time, location of the incident, business unit involved, description, Possible incident category).

https://skytrust.co

The Initial Incident must be raised within 24 hours and submitted to the ***supervisor***.

Appendix S Waste Monitoring Program

ResourceCo RRF Pty Ltd

Waste Monitoring Program

Wetherill Park RRF May 2025

Contents

2. Document Information

The following table contains administrative metadata.

Instructional material owner;	HSEQ Manager
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Version History

The following table details the published date and amendment details for this document.

Date Published	Version Detail	Reason for issue of amendments	Author or Document Owner (Program)
March 2023	1	New document.	Gary Salway
May 2025	2	Revision following rebrand	Ben Whitehouse

Waste Monitoring Program

B10. From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development. The program must:

A. include suitable provision to monitor on a daily basis the:
B. quantity, type, and source of waste received on site; and
C. quantity, type, quality and destination of the outputs produced on site.
D. ensure that:
E. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and
F. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste, including asbestos; and
G. require that all weighbridge data be retained for the life of the development and be made immediately available on request to the Secretary and/or the EPA.

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* 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. 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 provides a job description for this person's role. 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.

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 off 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 Proc 208 Training and verification of competency

Quality control

Hazardous materials

Any materials listed 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. Prohibited wastes include:

- Asbestos
- Liquid Wastes
- Special Wastes
- Chemical or Oil Wastes
- Medical Wastes
- Contaminated Soils
- Explosives
- Poisons
- Radioactive Wastes
- Pharmaceuticals
- Electronic Wastes
- Batteries
- Food Waste
- Green Waste
- CCA Timber
- PVC Plastics
- End of life tyres
- Car Batteries
- Mattresses
- Gas Cylinders
- Aerosols
- Paint Cans

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 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.
- Safe asbestos management and removal training for all relevant staff on site.

Safe asbestos management and removal procedures are outlined in CR-MP004 Asbestos Manag ement Plan.

Sharps and medical waste

Sharps and medical waste identification training for all relevant staff on site. Please see CR-SP001 Handling Sharps

Chemicals and oils

Hazardous Chemicals identification training for all relevant staff on site. CR-PR236 Hazardous Substances and Dangerous GoodsOil 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.

3. Process engineered fuel.

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

- Control of the wastes accepted into the facility, as described in Section 1 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 PBF analyser for the higher wood content PBF 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 inCR-PR217 – Managing Out of Specification PEF.

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. A visual inspection of the waste will then be performed by the Waste Receival Inspection Officer. Once a visual inspection of the waste has been undertaken and the material is deemed suitable as meeting acceptance criteria, 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.

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 be stored in the area designated on the approved plans for the outdoor storage of PEF, as described in CR-MP009 Operations site plan.

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:

- 10% of capacity to be designated quarantine area for out of specification PEF diversion temporary storage
- 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:

9. 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)
10. 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.
11. 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. 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.

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. Role specific training

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.

9. Reporting

The weighbridge data including type, PEF category and amount of waste (in tonnes) received on the site and all material produced on site and transported off-site (as product or waste) will be recorded and retained on site for the life of the facility.

Record keeping

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

Compiled calculations of percentages of incoming waste streams as well as Quarterly C&D recycling residuals declarations will be retained on site for the life of the facility and be kept readily available for submission to the EPA on request.

Area of management	Action	Frequency
Inspections and monitoring		
Energy from waste management	Inspection and screening of all incoming loads	On occurrence
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
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

Appendix T Maintenance Schedule

PROC 09/06/2023 – Maintenance of plant and equipment.

Purpose:

This procedure provides a process for the safe use of plant and equipment and will ensure that all plant and equipment is in good, safe operating condition prior to its use, and that proactive measures are taken to identify possible faults as well as ensuring that they are regularly serviced and maintained to minimise plant failure and injury to employees.

Scope:

This policy applies to all plant and equipment owned, hired or leased by Cleanaway Resourceco and its workers, contractors, subcontractors and their workers, labour hire personnel, any other people who undertake work for the company.

Responsibilities / Role

Worker:	Anyone undertaking work on behalf of Cleanaway ResourceCo, that must be trained and deemed suitably competent before undertaking tasks unsupervised.
Mentor / Trainer:	A competent and experienced person, who can instruct workers how to undertake works in a safe an effective manner as per Standard Operating Procedures. Mentors and Trainers are subject matter experts in their field.
Assessor:	A trained assessor (Certificate IV – Training and Assessing) who can determine a worker's competency at completing tasks as per the criteria set out in the relevant verification of competency, and procedural documentation.
HSEQ Manager	Administrator responsible for the development of training programs (in conjunction with experienced parties) as well as the documentation and record keeping of all verification of competency documentation.

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MAJOR PLANT AND EQUIPMENT

PRIMARY SHREDDER

The primary shredder cuts and sizes the raw material into an approximate 300mm piece size and drops the shredded material onto a collection conveyor situated below the machine. The machine is designed to be extremely robust with an automatic reverse function if a part that cannot be shredded enters the shredder. A large hopper will be fitted to the top of the shredder to receive the material from the front-end loader or excavator. Bi-directional shredding results in a consistent flow of shredded material onto downstream conveyors and ensures a homogenous and consistent product flow through the rest of the plant. This machine is designed to allow fines run through the cutting table with the minimal wear on the rotating parts and is extremely versatile on a wide range of materials.

MAINTENANCE REQUIREMENTS

Inspect regarding current condition, functionality problems, statuary compliance, etc.

Develop plans and execute repairs / replacements / Maint actions as identified.

For further details of Operations and Maintenance of the Primary Shedder refer to the Metso Denmark A/S Maintenance manual

003-SH-01 Primary Shredder (METSO) as defined in the MEX maintenance management system.

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

WASTE SCREEN

The Waste Screen is a vibrating screen with a circular motion that is driven by a three-phase AC motor. The heavy subframe compensates the dynamic vibrations of the screen and removable covers will be placed over the screen to reduce any dust emissions from the screen.

The primary shredded material vibrates over the waste screen which separates the smaller fraction (or "fines") from the material stream. This fines fraction is then processed on a different line in the plant to the larger size fraction.

MAINTENANCE REQUIREMENTS

Daily PM's after Production - Clean off fingers and remove any material build-up

Inspect for wear and damage, replace / repair the screen and screen support frame as per the manufacturer's recommendations.

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Inspection taken from "Documentation - Single deck Screen Type SEWS Flip-Flow-Screen Elastica" by Spaleck, pages 8 - 36 to 13 - 36

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

FLIP FLOP SCREEN

The flip flop screen is used to screen the fines into large and small sized fractions. Widely used in the recycling industry, flip-flop screens are manufactured with polyurethane dynamic screening mats, which are contracted and expanded throughout the vibration screening process. The small fraction is discharged into a designated holding bay for dispatching from the plant, while the larger fraction is conveyed into a single drum separator for further cleaning. The removable covers are placed over the screen to prevent dust egress from the screen but allow for easy access during maintenance.

MAINTENANCE REQUIREMENTS

Inspection taken from "Documentation - Single deck Screen Type SEWS Flip-Flow-Screen Elastica" by Spaleck, pages 8 - 36 to 13 - 36

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

SINGLE DRUM SEPARATOR (SDS)

The Single Drum Separator (SDS) separates the waste input into two fractions: heavy and light. The Single Drum Separator is a very versatile separator that processes a large variety of waste streams. The Single Drum Separator (SDS) has one splitter drum, at which the heavy material is separated from the light material. View the picture below for the operating principles.

The heavy fraction falls down in front of the splitter drum and is discharged by means of a conveyor while the light fraction is transported over the splitter drum and will be separated from the air in the expansion room. The air that is extracted from the expansion room is recirculated through the fan and

reused while a 10% of this air is bled of and passed through a dust filter. This capacity to adjust the volume of air going to the dust filter allows the easy adjustment of the separation parameters.

MAINTENANCE REQUIREMENTS

Inspection taken from "User Manual: Windshift with Drum DDS-2000 RH-HD" Document from Nihot, Section 8, page 38-41

Daily PM's after Production - Clean Splitter drum and scraper. Remove magnets. Check conveyor skirtings. Report. Clear fan ducting and check impeller.

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

DOUBLE DRUM SEPARATOR (DDS)

The operating principles of the double drum separator are almost the same as the single drum separator but the machine goes one step further and separates the material into Heavy, mid heavy and light products. This is very useful in this case where the heavy fraction would consist mainly of aggregates, the mid heavy fraction consists of mainly timber while the light fraction is considered the core feedstock for the high speed PEF secondary shredder. Due to the sensitivity of the secondary shredders to damage from foreign parts such as tramp iron the DDS also offers protection as any heavy parts that would damage the secondary shredder drops out in the heavy fraction.

The picture below shows the operating principles of the Double Drum Separator. The quality of separation can be adjusted by controlling the airflow to the dust filter on both blow nozzles. Dust is contained within the system through its inherent filtration design.

MAINTENANCE REQUIREMENTS

Inspection taken from "User Manual: Windshift with Drum DDS-2000 RH-HD" Document from Nihot, Section 8, page 38-41

Daily PM's after Production - Clean Splitter drums and scraper. Check conveyor skirtings. Report. Clear fan ducting and check impellers.

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

BALLISTIC SEPARATOR

The ballistic separator is used to improve the quality up the midheavy fraction from the Double Drum Separator. This fraction consists of mainly timber but it can be contaminated with textiles, footwear etc. The machine separates the 2 dimensional and fines fractions from the 3 dimensional fraction. It is important to target the fines in order to eliminate any additional wear on the timber shredder.

The 3D timber is refined in this process to reduce the workload on the labour employed to do the final quality control on the timber. The fines fall through the perforated paddles and are conveyed to the designated storage bay.

The screen is covered by a removable tarp to prevent dust egress.

MAINTENANCE REQUIREMENTS

Daily PM's after Production - Clean and remove any material build-up. Clean and check couplings. Report and problems.

Inspection taken from "Operating Manual - DOKON 500 H/S 30.645" by PAAL Group pages 168 - 170.

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

SECONDARY PEF SHREDDER

The Secondary shredder cuts the PEF materials into the final size ready for baling. It is a high speed and precise enclosed cutting machine which by its nature contains the dust created through the cutting process.

MAINTENANCE REQUIREMENTS

Replace filters in accordance with the manufacturer's recommendations with approved filter bags.

Engage a specialist company for this task.

Inspection taken from "BA60_en - Operating Instruction KOMET/POWER KOMET 2800" by Lindner, Chapter 6 "Maintenance and Service" pages 1/6 to 6/6. Labelled photos of SSxx and WSxx locations in manual.

Grease: Motors - Gadus S5 V100 2' Bearings - Gadus S2 V220 1

Daily PM's after Production - Clear hopper and HPU. Clean level sensors.

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

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TIMBER SHREDDER

The timber shredder is designed to cut to the final size tough to grind materials like cedar, Black Spruce and log ends. It is an enclosed hammer mill machine which, as per the PEF shredder, ensure that dust generated through this process is contained within the machine. It is more tolerant of rocks and metal and is therefore appropriate to do the final sizing of the more robust PEF fraction at the end of the process. This final sized material is then ready for baling.

MAINTENANCE REQUIREMENTS

Replace filters in accordance with the manufacturers recommendations with approved filter bags.

Engage a specialist company for this task.

Inspection taken from "BA60_en - Operating Instruction KOMET/POWER KOMET 2800" by Lindner, Chapter 6 "Maintenance and Service" pages 1/6 to 6/6. Labelled photos of SSxx and WSxx locations in manual.

Grease: Motors - Gadus S5 V100 2' Bearings - Gadus S2 V220 1

Daily PM's after Production - Clear hopper and HPU. Clean level sensors.

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

BALER

The baler is a horizontal shear baler with a standard bale size of 1100mm (H) x 1100mm (W) x variable length, and is designed for bales to be loaded into containers.

The typical bale weight is approximately 1 ton each depending on the bulk density of the material. The tying medium used to bind the bale is plastic twine which can also be recovered as fuel when the bales are unwrapped at their destination.

MAINTENANCE REQUIREMENTS

As per "Operating Manual - DOKON 500 H/S 30.645" by PAAL Group pages 155

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

WRAPPER

The wrapper encapsulates the baled PEF in a plastic film to ensure the bales are fully sealed and weather proof. The turn table maneuvers the bale into position while the wrapper arms apply the film wrap to the bale. Each bale takes approximately 30 seconds to 1 minute to wrap depending on the bale length. When wrapped the bales are ready for loading into containers for shipping to the customer.

MAINTENANCE REQUIREMENTS

As per "Maintenance Instructions CW-D-2200" by Cross Wrap pages 1-6

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

DUST COLLECTORS

MAINTENANCE REQUIREMENTS

Replace filters in accordance with the manufacturer's recommendations with approved filter bags.

Engage a specialist company for this task.

Inspect ducts for wear or damage, clean out ducts of any materials settled out in or blocking the duct, check mounting brackets and hangers for structural competence.

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

OPTICAL SORTER

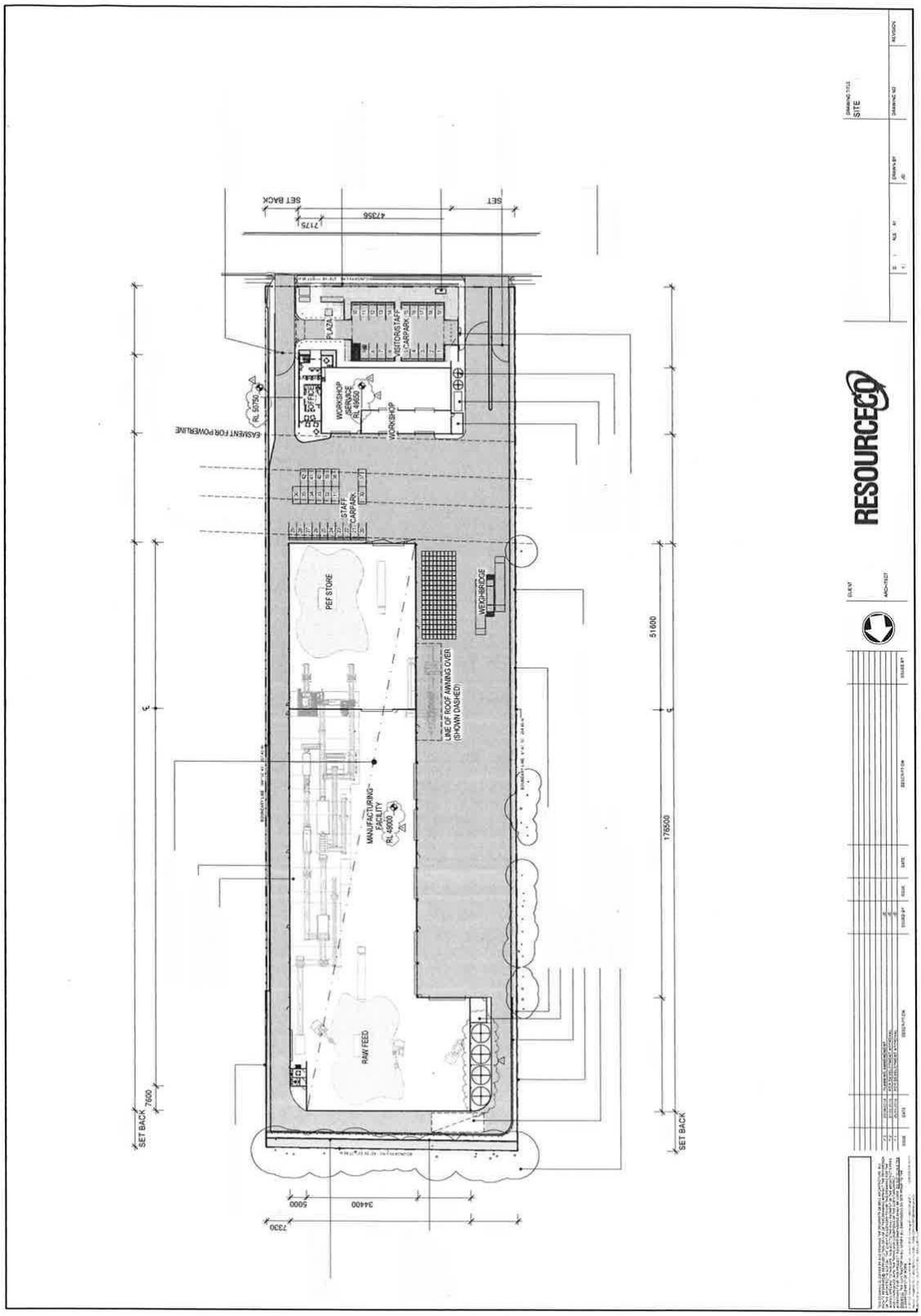
MAINTENANCE REQUIREMENTS

As per Optical Sorter System Manual.

INSPECTION REGIME TO MONITOR ITS PERFORMANCE / EFFECTIVENESS.

Inspection as per MEX preventive maintenance program.

Appendix U – Appendix A of ResourceCo RRF Operational Management Plan Wetherill Park RRF, March 2018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WORKSHOP
OFFICE
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RL 50750
EASEMENT FOR POWERLINE
STAFF CARPARK
PEF STORE
WEIGHBRIDGE
LINE OF ROOF AWNING OVER (SHOWN DASHED)
MANUFACTURING FACILITY RL 49600
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SET BACK
7600
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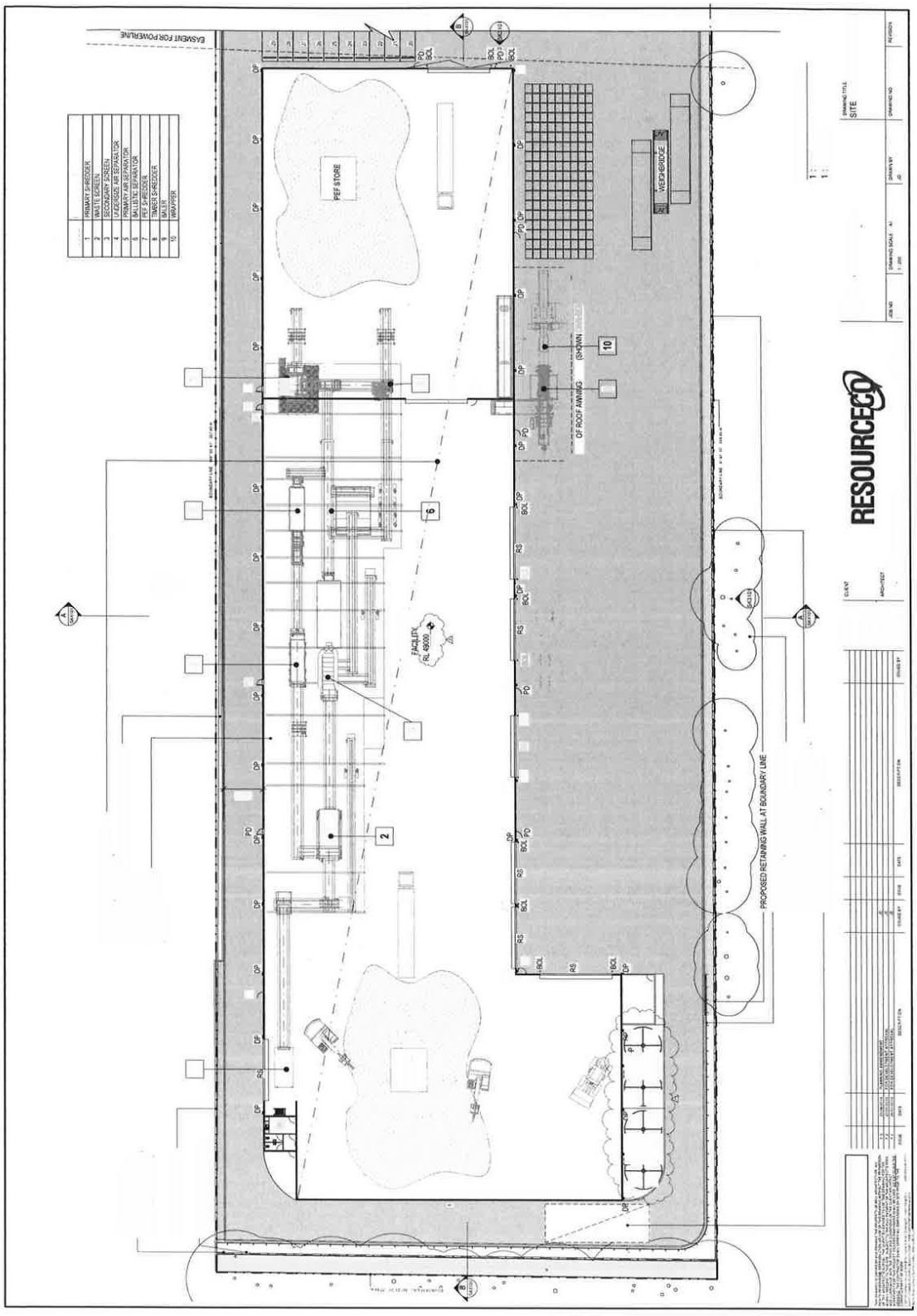
SITE
RESOURCECO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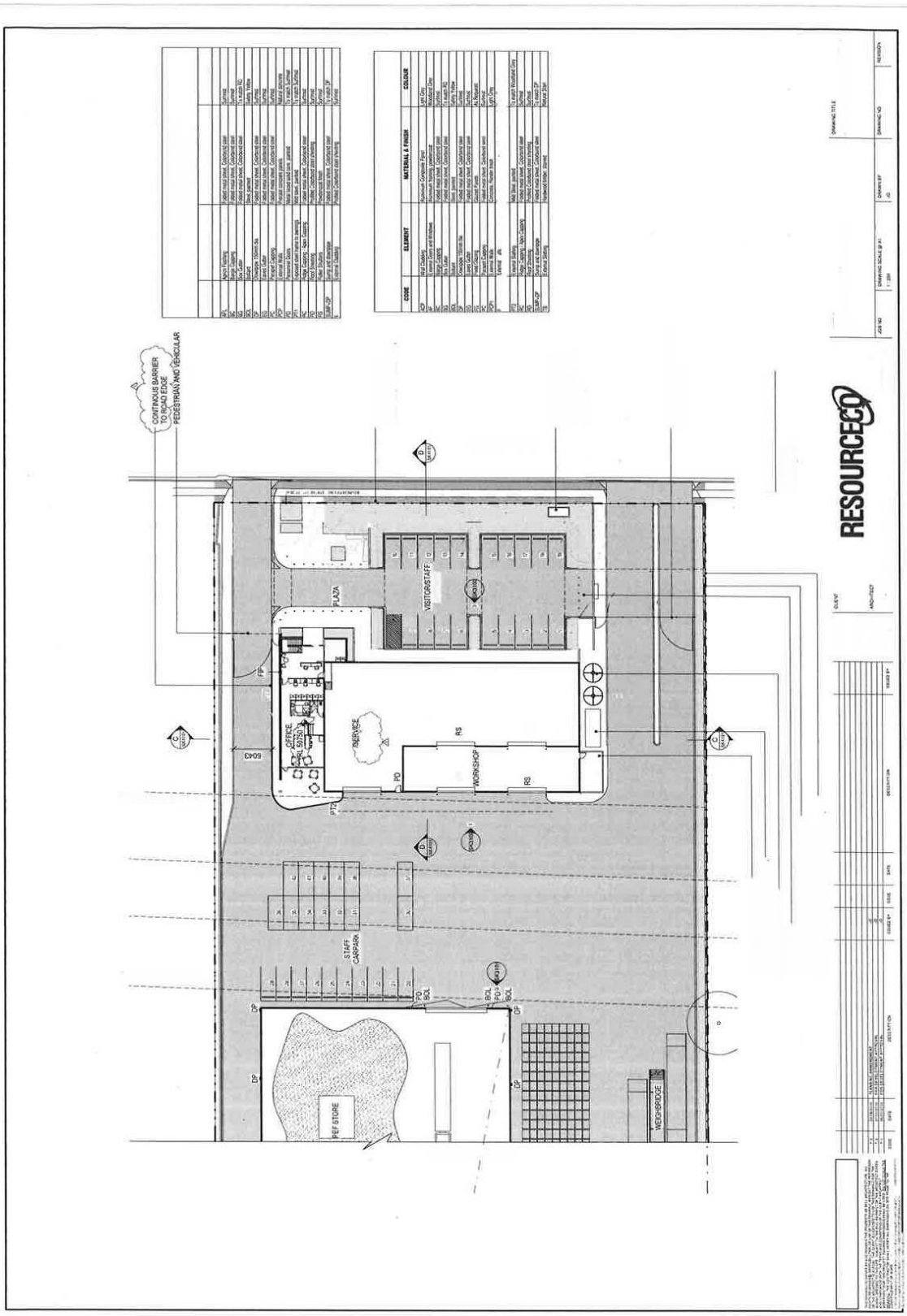
FACILITY RL 49000
PROPOSED RETAINING WALL AT BOUNDARY LINE
RESOURCECO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WORKSHOP
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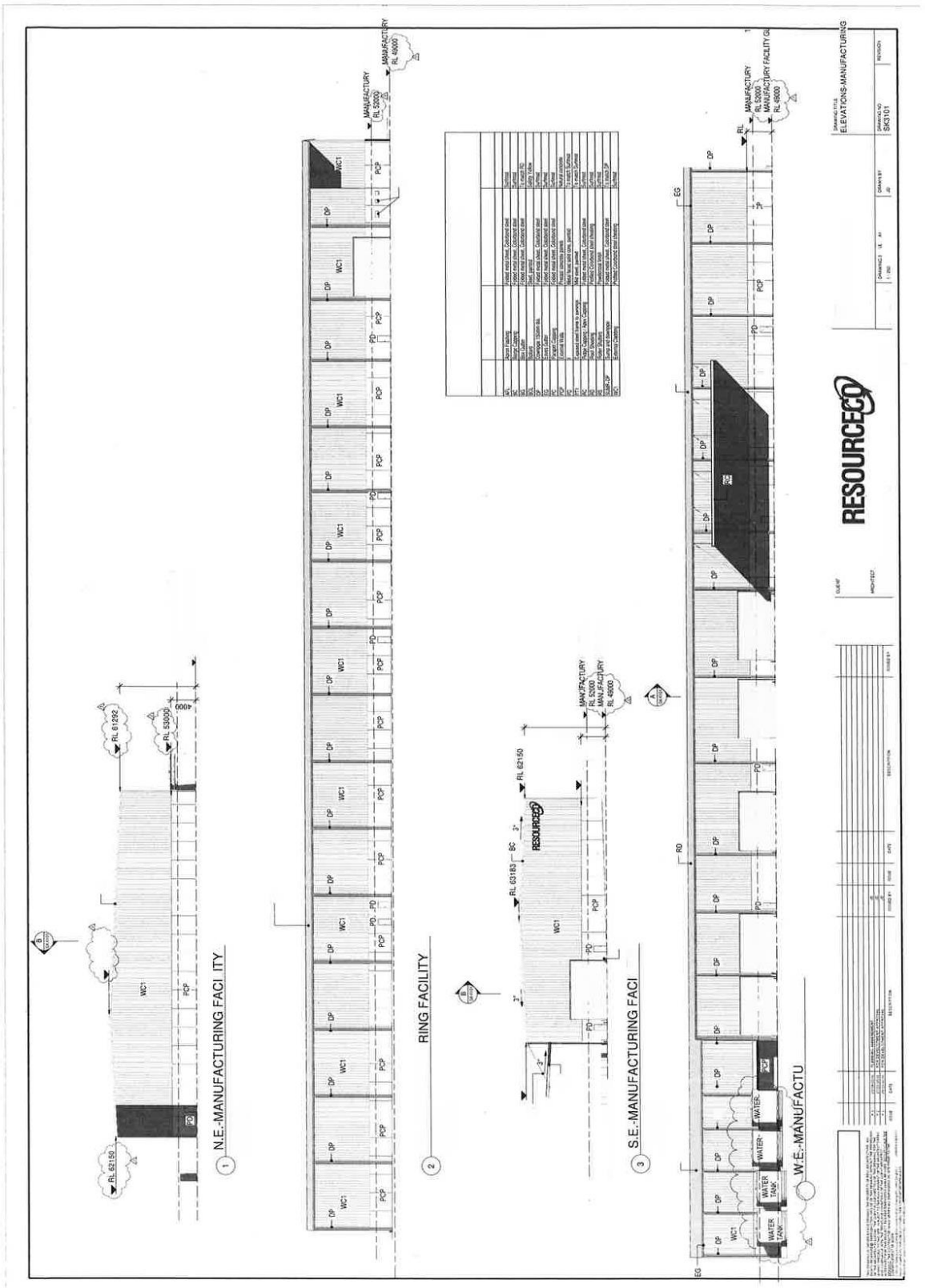
RESOURCECO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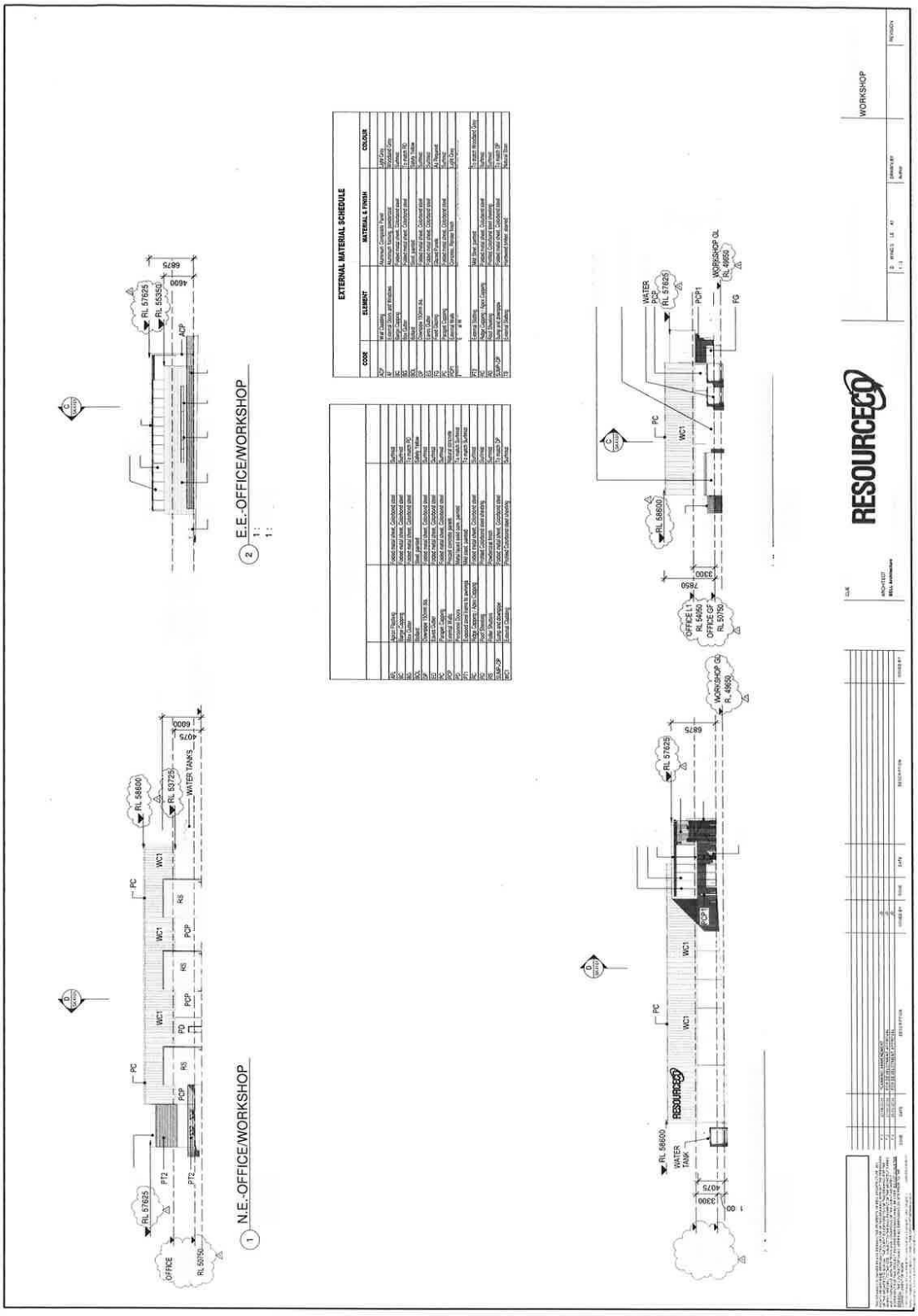
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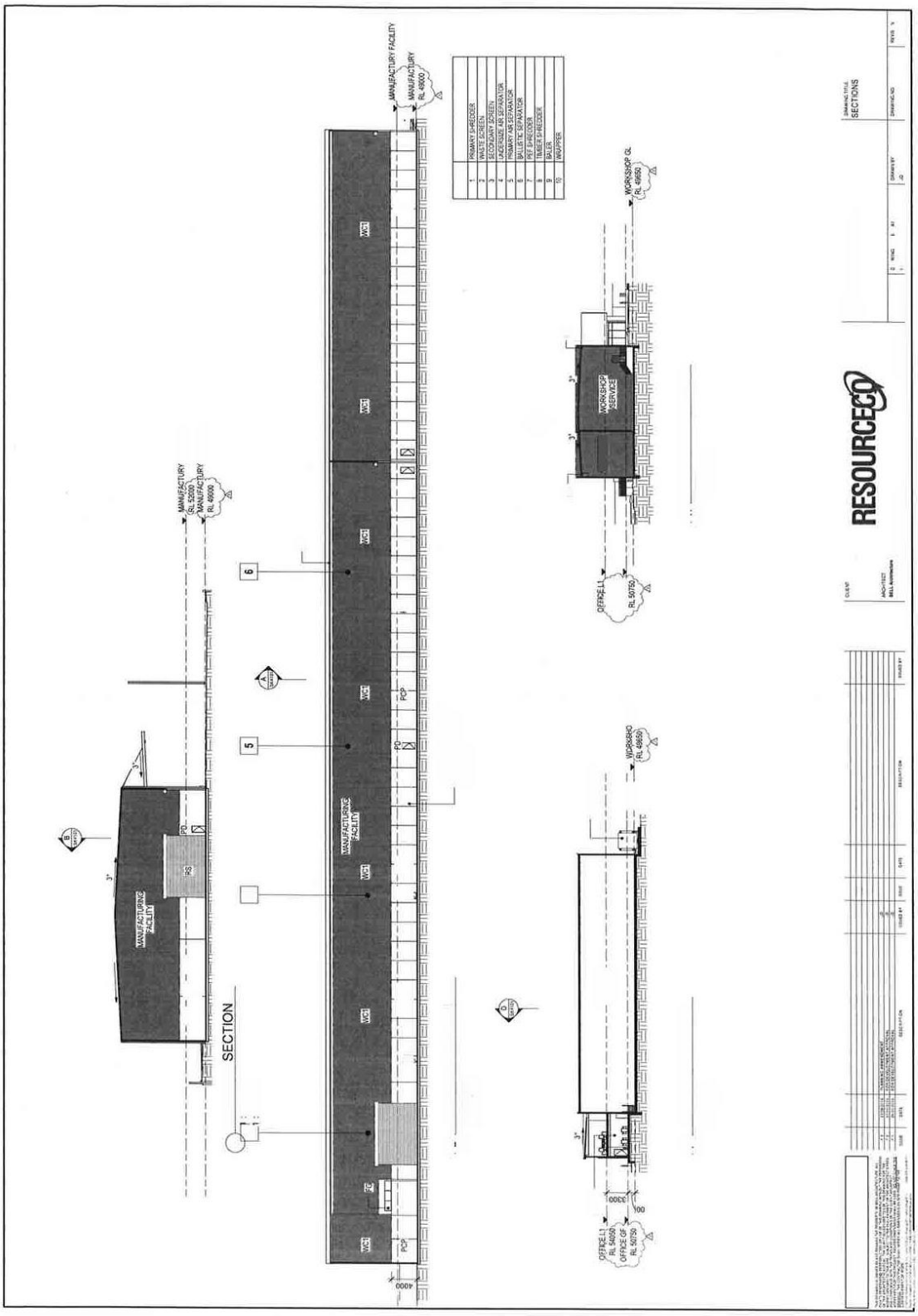
RESOURCECO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SECTIONS
RESOURCECO
MANUFACTURING FACILITY
WORKSHOP
OFFICE

PROC CR-MP001 – Operational Environment Management Plan.

Procedure Owner	**HSEQ Manager.**
Procedure Approver	HSEQ Manager
Approved Date	14/03/2018
Last Review Date	09/01/2025
Next Review Date	09/01/2028

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**