BINGO INDUSTRIES

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

AUBURN RECYCLING CENTRE

OEMP – v8

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP)

Occupant:	Auburn Recycling Pty Ltd
Postal Address:	PO Box 7535, Silverwater NSW 2128
Telephone:	1300 424 646
Street Address:	3 – 5 Duck Street, Auburn NSW 2144
Intelex Reference:	OEMP-002
Current version:	v8 – October 2026

REVISION HISTORY

Date	Description of Change	Amendments by	Contained in version
3 July 2015	Initial issue	Ros Dent – Environmental Manager	v0
5 October 2015	Review and update	Ros Dent – Environmental Manager	v1
11 January 2016	Review and update	Ros Dent – Environmental Manager	v2
4 January 2018	Review and update	Ros Dent – Environmental Manager	v3
4 February 2019	Review and update	Ros Dent – Environmental Manager	v4
20 May 2020	Review and update	Ros Dent – Environmental Manager	v5
4 December 2023	Updated	Ros Dent – Environmental Manager	v6
26 May 2025	Updated	Anil Odemis – Environmental Officer	v7
October 2026	Reformatted into the 2026 Management Plan Template and restructured; updated against EPL 10935 (version 5 June 2026)	Adam Philip – Environment Manager	v8

ACRONYMS AND DEFINITIONS

Acronym / Term	Meaning
ARC	Auburn Recycling Centre.
AS/NZS	Australian/New Zealand Standard.
Auditor	Person with the competence to conduct an audit.
BCA	Building Code of Australia.
CCC	Cumberland City Council.
Continual improvement	Recurring process of enhancing the management system to achieve improvements in overall environmental performance in line with the organisation's environmental policy.
Corrective action	Action to eliminate the cause of a detected non-conformity.
CRWM	Combustible recyclable and waste materials.
DA	Development approval (development consent) – DA 542/98 (as modified).
DGHM	Dangerous goods and hazardous materials.
Document	Information and its supporting media.
EMS	The part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.
EMS audit	A systemic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organisation's management system conforms to the management system audit criteria set by the organisation, and for the communication of the results of this process to management.
ENM	Excavated natural material.
Environment	Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelations.
Environmental aspect	Elements of an organisation's activities, products or services that can interact with the environment.
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's activities, products or services.
Environmental objective	Overall environmental goal, arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practicable.
Environmental performance	Measurable results of the management system, related to an organisation's control of its environmental aspects, based on its environmental policy, objectives and targets.
Environmental policy	Statement by the organisation of its intentions and principles in relation to its overall environmental performance that provides a framework for action and for the setting of its environmental objectives and targets. ISO 14001 Elements: 4.2.
Environmental target	Detailed performance requirement quantified where practicable, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set in order to achieve those objectives.
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW).
EPA	NSW Environment Protection Authority.

EPIRMP	Emergency and Pollution Incident Response Management Plan, incorporating the Pollution Incident Response Management Plan required by Part 5.7A of the POEO Act.
EPL	Environment Protection Licence issued under the POEO Act (EPL 10935 for the ARC).
GHS	Globally Harmonised System of Classification and Labelling of Chemicals.
GSW	General solid waste.
IDMS	Intelex document management system.
Interested party	Individual or group concerned with or affected by the environmental performance of an organisation.
Internal audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the management system audit criteria set by the organisation are fulfilled.
ISO	International Standards Organisation.
JSEA	Job safety and environmental analysis.
LPG	Liquefied petroleum gas.
Material harm	Material harm is harm that: • Involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or • Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $50,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).
MLA	Metropolitan levy area.
NCW	Non-conforming waste.
Non-conformity	Non-fulfilment of a requirement.
OEMP	Operational Environmental Management Plan – a plan for the management of environmental impacts.
Organisation	Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration. In this instance, Bingo Industries.
PDCA	Plan, Do, Check, Act.
POEO Act	Protection of the Environment Operations Act 1997 (NSW).
PPE	Personal protective equipment.
Preventative action	Action to eliminate the cause of a potential non-conformity.
Prevention of pollution	Use of processes, practices, techniques, materials services or products that avoid, reduce or control the creation. Emission or discharge of pollutants or waste which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution in order to reduce adverse environmental impacts.
Procedure	Specified way to carry out an activity or a process.
Record	Document stating results achieved or providing evidence of activities performed.
RRO / RRE	Resource recovery order / resource recovery exemption.

SDS	Safety data sheet.
SEQ	Safety, Environment and Quality.
SOP	Standard operating procedure.
SWMS	Safe work method statement.
Waste Regulation	Protection of the Environment Operations (Waste) Regulation 2014 (NSW).

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1 INTRODUCTION

1.1 Background

3 - 5 Duck Street Auburn is a waste recycling depot in the local government area of Cumberland City Council (CCC) and operating under development approval DA 542/98. DA 542/98 has subsequently been modified under section 96 (now section 4.55) of the EP&A Act, with modifications approved by CCC.

The site receives, stores and processes waste for recovery or recycling. The Operational Environmental Management Plan (OEMP) has been developed to reflect operations on-site and will be reviewed annually or following a significant change to operations.

Auburn Recycling Pty Ltd (ARC) recovers valuable resources from inert waste mostly from construction and demolition industry sources but also from domestic and commercial industrial sources. Waste is delivered to the site in utes, hook bins and skip bins, front lift trucks and in bulk on trucks.

Materials are sorted and where possible processed and recovered for recycling. Some materials are processed to a standard suitable to market and others are sent for further processing off-site by third parties and the Bingo Facility at Eastern Creek. Residual waste that cannot be recovered for recycling is transported to lawful facilities for disposal.

Auburn Recycling's current aim is to recover and recycle a minimum of 90% of material received on-site once transferred to the Bingo Facility at Eastern Creek.

The site operates under Environment Protection Licence 10935 (EPL 10935), issued under the Protection of the Environment Operations Act 1997 (POEO Act), for the scheduled activities of resource recovery (recovery of general waste) and waste storage (other types of waste). The OEMP reflects the wastes received on-site in mixed general solid waste (non-putrescible).

This plan focuses on the environmental management of operations on the site. This OEMP reflects all current and proposed operations subject to relevant authority approval and is to be read in conjunction with other site management plans. Site operations include those outlined in Table 1-1.

Table 1-1: Scheduled Activities Authorised under EPL 10935

Scheduled Activity (Act)	Licensing Fee Category (Regulation)	Scale
Resource recovery – recovery of general waste	Recovery of general waste	Any general waste recovered
Waste storage	Waste storage – other types of waste	Any other types of waste stored

1.2 Purpose and Application

The purpose of this OEMP is to set out the environmental procedures, processes and controls that will be implemented by all staff, including contractors, for activities associated with the operation of ARC.

This OEMP applies to all Bingo employees, contractors, subcontractors and visitors undertaking activities at the ARC, and is to be read in conjunction with the Bingo Environmental Management System (EMS) and the EPIRMP (Appendix C).

1.3 Objectives and Targets

The OEMP will:

- Provide a management framework that aims to control potential operation impacts on the environment, through the identification and use of:
  - Environmental objectives
  - Key environmental risks
  - Management controls
- Ensure that all operational staff are made aware of the potential operational impacts on the environment and associated management controls within which they are expected to conduct their activities
- Identify management responsibilities and define reporting requirements
- Provide evidence of compliance with the approvals as well as relevant legislation, policies and guidelines
- When required, provide stakeholders with assurance that the operation of the Site is being managed in an environmentally acceptable manner.

Measurable targets for each environmental aspect are set out under the relevant subsection of Section 4. Environmental objectives and targets are revised annually and approved by management, and the results of the annual review feed into the management of risks, aspects and impacts (refer Section 6.3).

1.3.1 Safety, Environment and Quality Policy

The Safety Environment and Quality Policy (SEQ Policy) is a fundamental element of this OEMP and is integral to everything that the Site and its staff do. The SEQ Policy is available on the document management system, displayed on the Site, and is a central component of the Site induction training for all staff. The SEQ Policy is consistent with the objectives of this OEMP.

BINGO INDUSTRIES

HEALTH, SAFETY AND ENVIRONMENT (HSE) POLICY

At BINGO we care about our people, the environment and the community in which we operate.

Our goal is to conduct our business in a way that causes no harm to the health and safety of people and the environment. This commitment includes:

- Preventing serious injuries and fatalities, while continually striving to reduce other physical and psychosocial health and safety injuries and illnesses; and
- Minimizing our environmental impact and protecting natural resources by preventing pollution, enhancing climate resilience and pursuing sustainable operational practices.

To achieve these aspirations, BINGO is:

Risk focussed	Responsible and accountable	Open and transparent
Our workplaces and transport operations are inherently hazardous, and we understand and control the risks and impacts associated with our activities, products and services, with an emphasis on critical risks and controls and regulatory compliance.	Leaders across the organisation are empowered to deliver safe and environmentally responsible business outcomes. Everyone at BINGO is responsible for HSE and authorised and encouraged to suspend work if either unsure or concerned about the risks of a task.	We share our HSE performance-to reinforce what is working and to learn from what has not. We prioritise understanding the needs and expectations of our stakeholders and genuinely work with them to find effective solutions. We actively engage with our people and encourage their participation in HSE programmes.

This policy is given effect through implementing and continually improving our integrated management systems and processes, consistent with our ISO 14001 and 45001 certifications, and by establishing measurable KPIs, objectives and targets to support our journey.

Kevin Gluskie

Chief Executive Officer

BIN-POL-1 V6 Uncontrolled when printed 09/02/2026

BINGO INDUSTRIES

QUALITY POLICY

BINGO is a leading provider of waste management and resource recovery solutions that strive for a Waste Free Australia

At Bingo, we know that our customers and stakeholders expect us to do what we say we are going to do, that we do it well and that we are continuously looking to do better. Our Quality Policy and System provides the structure and process to achieve this.

It is the backbone of a sustainable business and ensures our social licence to operate, development and growth. Our goal is to conduct our business in a way that it causes no harm to people and the environment.

To achieve these aspirations, BINGO is:

Customer focussed	Responsible and accountable	Continuously improving
Products and services that are aligned with customer expectations and are fit for purpose and fulfil customer expectations.	Conducting assessments to control the risks and impacts associated with our activities, services and products.	Continual improvement by making incremental changes to enhance processes, products, or services.
Providing consistent, reliable and compliant products and services.	Understanding and satisfying all applicable system requirements and complying with relevant laws and regulations.	Executing on constructive feedback received from Management reviews, internal audits and surveys.
We actively engage with our customers and encourage their feedback.		To adopt an innovation-centric approach in meeting our KPI's.

This policy is given effect by Executive management through implementing, reviewing and continually improving our integrated management systems and processes, consistent with our ISO 9001 certifications, and by establishing measurable KPIs, objectives and targets to support our journey.

Kevin Gluskie

Chief Executive Officer

SEQ-POL-56 Uncontrolled when printed 16/05/2025

Figure 1-1: SEQ Policy

1.4 Consultation

The ARC, being in an industrial area, consults with other businesses in the area. The Site Supervisor is in contact with the neighbouring businesses.

The Site receives and welcomes regular correspondence from the NSW Environment Protection Authority (EPA) and Cumberland City Council (CCC).

There are systems in place to ensure that staff are consulted on matters that affect their environment. Staff are also made aware through consultation and training and by providing access to relevant information of the risks and controls that affect their impact on the environment.

We ensure that consultation with staff and other stakeholders is undertaken on matters that involve:

- Identification of, or changes to, environmental aspects and impacts
- Controls that are required to minimise environmental impacts
- Changes to, or introduction of, new policies, procedures, forms and/or work instructions
- Resources required to provide environmental management, address environmental impacts and achieve continuous improvement
- Individual and company roles and responsibilities.

We also ensure that stakeholders, including staff, have access to news and information pertaining to the business, environmental achievements and the environmental performance scorecard.

Consultation with staff and opportunities to raise awareness occur via the following mechanisms:

- SEQ toolbox meetings
- Site visits
- Site inspections
- Staff training
- Stakeholder meetings and other communications.

1.5 Structure within the EMS

The OEMP works in conjunction with the Environmental Management System (EMS) which supports the OEMP and integrates processes and procedures at the enterprise, business unit and function level, and allows for the measurement and evaluation of environment performance.

The ARC OEMP and the Bingo Industries EMS system ensures that everyone (including visitors and contractors) understand and comply with relevant health, safety, environment and quality legislation, standards, policies, procedures and other requirements whilst engaging with Bingo Industries.

ARC have implemented the OEMP under the umbrella of an EMS.

ARC is aiming to maintain certification to:

- ISO 14001:2015 Environmental Management Systems.

The Bingo Industries Safety Environmental Quality (SEQ) Team manages the EMS and its associated policies and procedures. Management plans, procedures and associated documents are available on the document management system.

In accordance with the OEMP and the EMS requirements, the SEQ Team conducts SEQ site and non-conformance checks and internal audits in accordance with the SEQ Procedures.

Bingo applies the Plan, Do, Check, Act (PDCA) approach to implementation of the EMS. Figure 1-2 provides an overview as to how this has been adopted for ISO 14001 implementation[1].

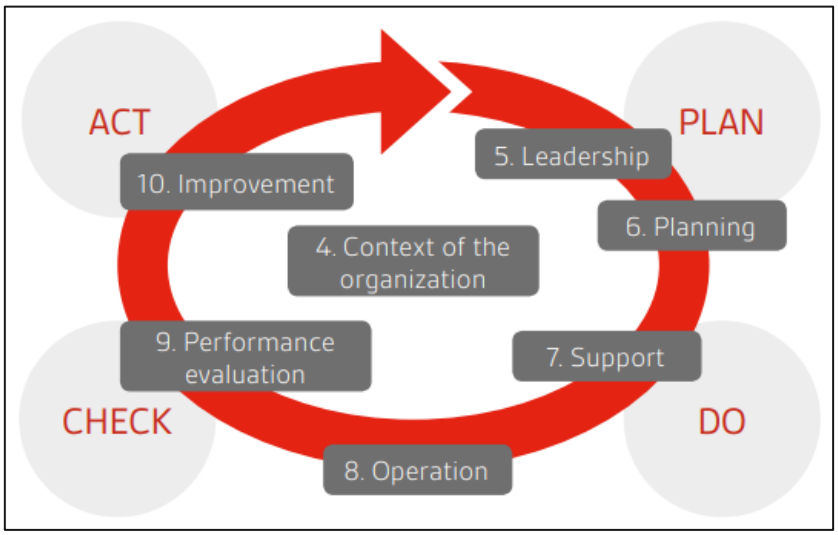


Figure 1-2: Relationship between PDCA and ISO 14001 implementation

[1] BSI Group *Moving from ISO 14001:2004 to ISO 14001:2015*

https://www.bsigroup.com/LocalFiles/en-GB/iso-14001/Revisions/ISO-14001-transition-guide.pdf

2 FACILITY DESCRIPTION

2.1 Regional Context

Auburn Recycling is located at 3 - 5 Duck Street, Auburn. The site is leased for the purposes of waste storage and waste processing of general mixed waste.

The site is reasonably level and paved with concrete. The site is adjacent to Duck River, the M4 Motorway and Parramatta Road. The northern boundary is bordered by a public reserve along the southern bank of Duck River which is heavily vegetated and provides screening of the site from the public reserve.

Figure 2-1: Location and surrounding building (Ref: Google Maps)

2.1.1 Surrounding Development

The businesses occupying surrounding lands are mixed uses and include warehousing of industrial equipment, bulky goods retail and industrial businesses including concrete batching.

Concrete occupies the premises immediately to the south of the site where it operates a concrete batching plant. The site to the rear of Duck Street is vacant land approved for use as a landscape supplies business. Roads surrounding the site are used by a large variety of vehicles including heavy vehicles. Parramatta Road is a main thoroughfare and provides the main access to Duck Street.

2.2 Facility Overview

The two buildings outlined in Figure 2-2 have been constructed and house most site operations including unloading, loading, sorting and processing.

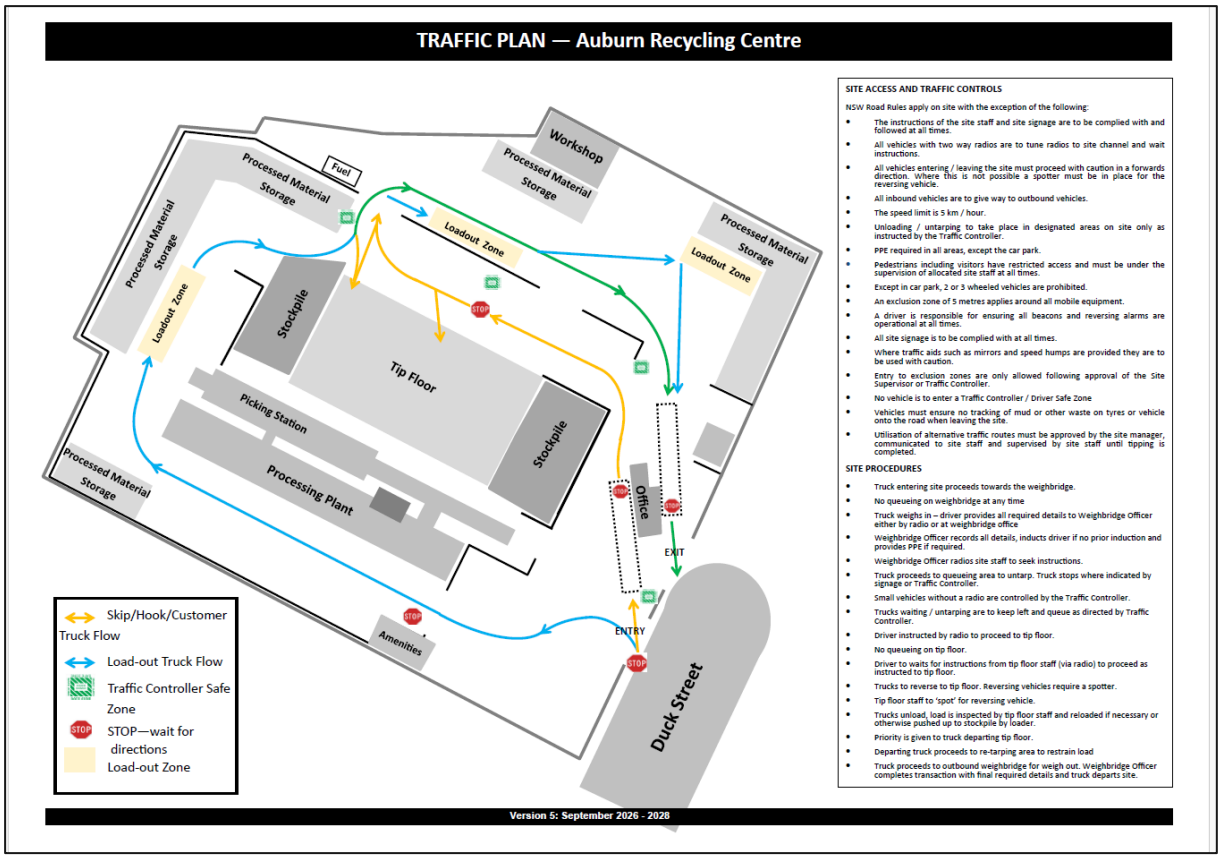


Figure 2-2: Site Plan

2.2.1 General Activity

The Site receives and transfers Solid Inert Waste delivered in bins and trucks from construction demolition and domestic sources. Figure 2-3 and Figure 2-4 below provides an overview of the material receipts and transfers. The waste received on-site is GSW (non-putrescible) under the NSW EPA "Waste Classification Guidelines". All materials are pre-classified GSW with the exception of soils, which are not pre-classified.

EPL 10935 nominates the acceptance criteria for soils that are also reviewed in relation to potential for resource recovery and compliance with Resource Recovery Order and Resource Recovery Exemption requirements.

Materials are stockpiled separately within the buildings. Bulked up materials may be stored outside the sheds to a maximum height of 4.0 metres. Bulked up material includes timber and metal. The volume stored on-site at any one time is significantly influenced by weather, supply of waste and availability of markets for recovered materials. Materials are managed on a first-in first-out basis, and transport of outbound materials is prescheduled to ensure capacity remains to store materials in the instances outlined above.

The Site processes material to reuse and recycle recovered materials from the waste as a means to achieve a resource recovery target of 90%. Material is stored on-site temporarily for processing and for transport after separation to the Bingo facility at Eastern Creek.

2.2.2 Signage and Access

The Site displays suitable signage as a means of communication with the public, customers and visitors to the Site.

Site access for all visitors and incoming waste vehicles are restricted to via the entry point to site, and this area is appropriately sign posted.

Signage on entry to the Site includes site rules, PPE requirements, list of prohibited materials, the Site speed limit and radio channel to communicate with site staff.

The bulk of waste and materials brought to site is delivered in either bulk trucks or in skip and hook bins. All incoming material is subject to an inspection process as outlined in Section 4.2.6, and non-complying waste is treated in accordance with the relevant management plans. Only inert Construction and Demolition waste is taken to the ARC.

The traffic controller manages unloading of all vehicles while the Site is open to the public for unloading.

Potential emissions arising from this activity include greenhouse gases and noise from vehicles and plant operations and dust emissions when tipping and managing material.

2.2.3 Weighbridge Operations

The weighbridge operator is responsible for ensuring correct and accurate operation of the weighbridge at all times. They supervise regular calibration assessment, correct operation and incoming and outgoing vehicles and visitors. This includes recording all relevant and required information in relation to vehicles and waste entering and leaving the Site. A weighbridge consists of several components that need to be operating correctly including software to maintain appropriate records and other documentation (e.g. waste materials, recovered materials and materials recovered for recycling) are kept in accordance with the POEO Act and Regulations.

Inbound and outbound materials are recorded at the weighbridge as per NSW EPA requirements and records are kept for the required period.

Consumables are accepted only if they are approved to be held on-site. A Safety Data Sheet (SDS) is available in the templates drive, and a hard copy is kept in the weighbridge office for each substance held on-site including for any hazardous materials and dangerous goods.

The configuration and operation of a weighbridge varies depending on the type and size of the weighbridge. The weighbridges at Auburn Recycling are pit weighbridges installed at ground level for ease of access by all vehicles that tip and load waste on-site.

2.2.4 Incoming (Raw) Materials

Waste and materials enter the Site in hook and skip bins, front lift and bulk trucks. All trucks enter the Site via the inbound weighbridge. All incoming material is subject to an inspection process and any NCW including unexpected finds are treated in accordance with the relevant procedures including where required Waste Classification and Acceptance, Waste Transport and Disposal, and Asbestos which are referenced in Supporting Documents. Rejected loads are managed in accordance with Reject Load Procedures.

2.2.5 Use of Mobile Plant and Equipment

The use of mobile plant and equipment is as per the manufacturer's recommendations. ARC employs trained and experienced operators and Safe Work Method Statements (SWMS) are in place for vehicle operators. Competency assessments are conducted on mobile equipment operators on a regular basis. Potential emissions arising from this activity include greenhouse gases and noise from plant operations and dust emissions when managing material. Reference Success Factors (Learning Management System).

2.2.6 Processing of Materials

The on-site processing of materials includes sorting of material for the purpose of reuse, recovery and recycling. These processes involved the use of mobile plant and equipment.

Site operations require the use of mobile equipment including, for example:

- Excavators
- Forklifts
- Wheel loaders
- Industrial sweepers
- Mobile equipment changes from time-to-time pending maintenance and other site needs.

Fixed equipment includes:

- Double walled self-bunded fuel tank (28,000 litres)
- Excavators sort tipped material and load outbound trucks
- Wheel loaders are required for movement of material around the Site and loading trucks.

Figure 2-3 provides details of the material management process and operations. Potential emissions arising from the use of vehicles, plant and equipment on-site to move and manage materials are:

- Dust
- Noise
- Water

Heavy plant and machinery require fuelling and maintenance and as a result, fuels, chemicals and other substances are stored on-site. These items are potential pollutants in the event of an accident or incident on-site.

The Emergency and Pollution Incident Response Management Plan (EPIRMP) discusses scenarios designed to mitigate emergencies involving these materials – refer Appendix C.

2.2.7 Outgoing Materials/Product Out

Residual waste leaves ARC in bulk. Prime movers, with semi-trailers, transport residual waste destined for Bingo Eastern Creek for further processing. After further processing waste to landfill consists mostly of materials such as dirty plastics textiles and contaminated timber that do not have viable markets for large volumes of these materials currently.

Waste for recovery, reuse and or recycling consists mostly of heavy building and demolition materials including concrete, brick, tile, soil, aggregate, timber and any mix of these materials. These recovered materials are destined for other facilities for recycling.

Other materials that are easily recovered on-site include ferrous and non-ferrous metals, paper and cardboard and plasterboard. These materials are placed into hook bins for transport to recycling facilities. When full, the bins are transported by either Bingo or another third party provider to a material specific recycling facility for further processing.

All outgoing waste transport is pre-scheduled where possible to ensure minimal impact to site operations and traffic. Loading out of outbound product is scheduled to avoid peak periods for inbound waste.

Impacts arising from this activity include traffic and noise.

2.2.8 Fate of Materials

Agreements are in place with licenced facilities that can accept waste for disposal by application to land. These materials are dealt with on a case-by-case basis in accordance with site procedures and legal and other requirements. Materials classified for disposal are disposed of at a lawful facility.

Resources that are recovered from waste are transported to resource recovery facilities, end markets and/or businesses that manufacture recycled content products.

Agreements are in place with facilities that accept specific materials for recovery and recycling. All facilities accepting this material maintain the appropriate licences where required and other approvals to do so and have confirmed their ability to accept this material.

2.2.9 On-site Material Process Flow

An overview of material receipt and transfer is provided in Figure 2-3, and the flow of material through the Site is shown in Figure 2-4.

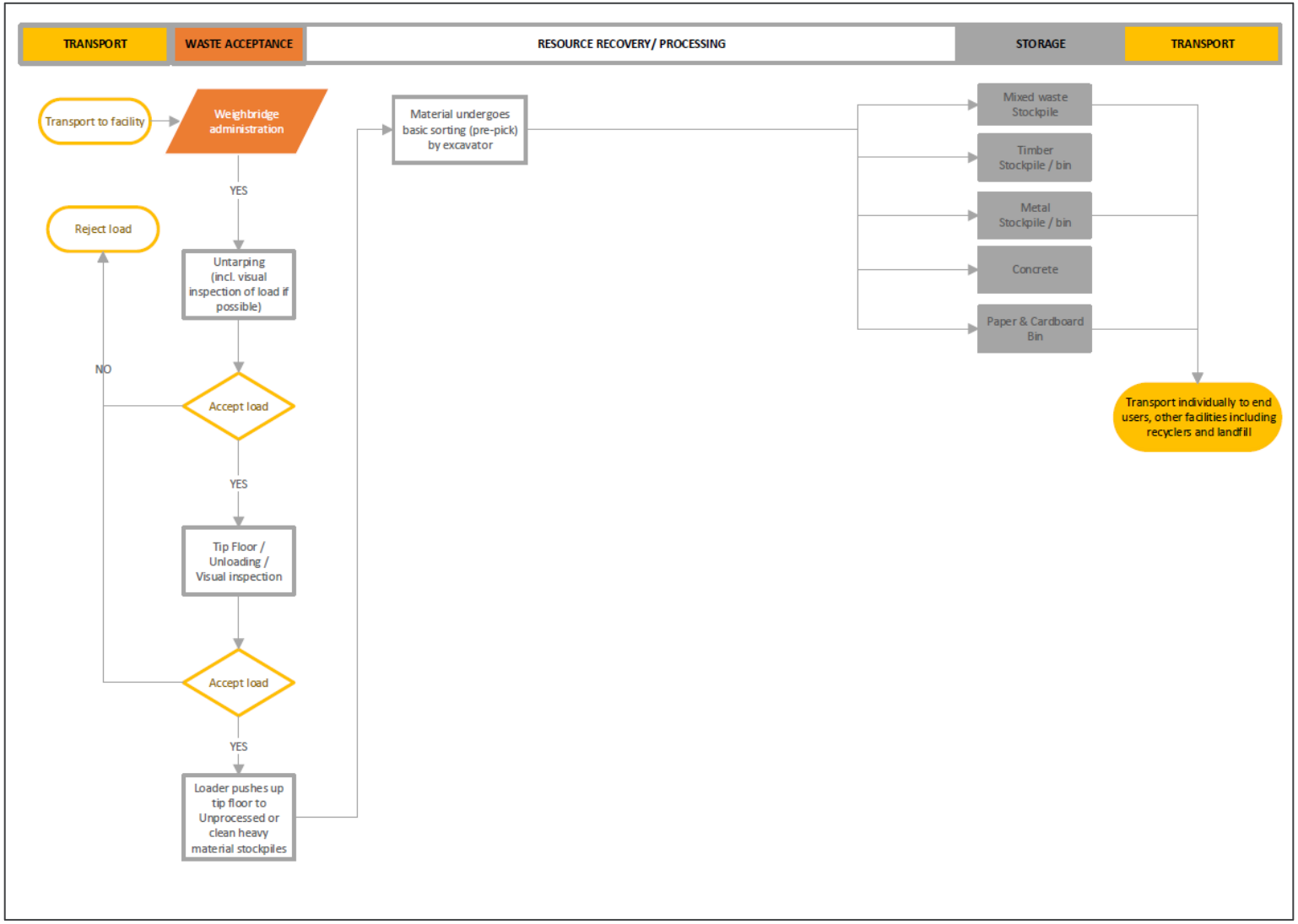


Figure 2-3: Process Flowchart - Overview

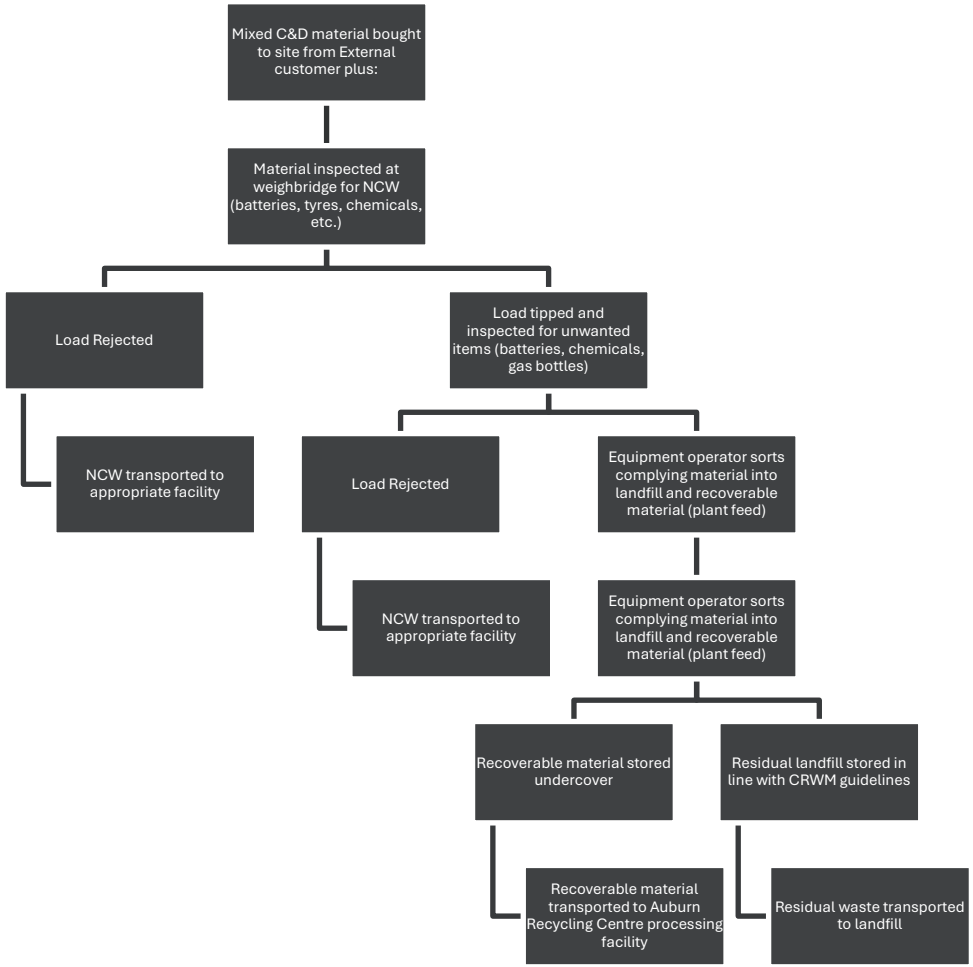


Figure 2-4: Process Flowchart - On-site Materials

2.3 Hours of Operation

Waste is received and loaded out between the hours of 7.00am and 7.00pm. Prime mover semi-trailers and truck and dog trailers cart recovered material and residual waste for processing and disposal to other facilities.

Waste sorting and processing activities occur between 7.00am and 7.00pm. Drivers of vehicles parked on-site have access to the site 24-hours Monday to Friday and Saturday up until 1.30pm.

Hours of operation are shown in Table 2-1.

Table 2-1: Hours of Operation

Requirement	Day	Operation and Truck Movements
Under this OEMP	5 days a week	Machinery may operate during business hours, 5 days a week
Current Operating Hours	Monday to Friday	7.00am to 7.00pm
-	Saturday	7.00am to 1.30pm
-	Sunday & Public Holidays	No operations

Operating hours have been checked against DA 542/98 (Condition 102) and EPL 10935 Condition L4.1. Both documents specify crushing, grinding and separating operations may occur between 7:00am-7:00pm Monday to Friday and 7:00am-1:30pm Saturday, with no operations on Sundays or public holidays.

3 STATUTORY REQUIREMENTS

3.1 Legal and Other Obligations

The legislation, regulatory instruments and guidelines relevant to the environmental management of the ARC include:

- Environmental Planning and Assessment Act 1979 (NSW) (EP&A Act);
- Protection of the Environment Operations Act 1997 (NSW) (POEO Act);
- Protection of the Environment Operations (Waste) Regulation 2014 (NSW);
- Protection of the Environment Operations (General) Regulation 2022 (NSW);
- Updated Reference from Work Health and Safety Regulation 2017 (NSW) to Safety Regulation 2025;
- Environment Protection Licence 10935 (EPL 10935);
- Development consent DA 542/98 (as modified);
- Waste Classification Guidelines Part 1: Classifying Waste (NSW EPA, 2014);
- Standards for Managing Construction Waste in NSW (NSW EPA);
- Applicable resource recovery orders and exemptions;
- AS/NZS 5667 Water quality – Sampling; and
- ISO 14001:2015 Environmental management systems.

For compliance with planning and environmental approvals, Bingo maintains a Compliance Register documenting its Site compliance requirements sourced from relevant documents. Reporting obligations are summarised in Appendix B. The Compliance Register is reviewed and updated on a regular basis.

3.2 Development Consent

The ARC operates under development consent DA 542/98, which has been modified under section 96 (now section 4.55) of the EP&A Act. Cumberland City Council is the consent authority. The developments on the Site are required to comply with the conditions of consent, construction certificates and Building Code of Australia (BCA) requirements, including essential services.

DA 542/98 Condition	Requirement	OEMP Section
Condition 7	External stockpiles to be screened from public view by fencing and landscaping.	Stockpile Management / Visual Amenity
Condition 8	Management strategy required to prevent accidental discharge of chemicals or pollutants to Duck River and adjacent vegetation.	Surface Water / Incident Management
Condition 9	Wet dust suppression system to be installed on crusher/screen and outside stockpiles.	Dust Management

Condition 10	Review of dust amelioration measures and upgrade if required.	Dust Management
Condition 102	Crushing, grinding and separating operations only between 7:00am-7:00pm Monday-Friday and 7:00am-1:30pm Saturday. No Sundays or public holidays.	Hours of Operation
Condition 105	Activities must minimise dust emissions from the premises.	Dust Management

Note: A review of the available DA 542/98 documentation identified the above conditions as relevant to this OEMP revision.

3.3 Environment Protection Licence Conditions

Environment Protection Licence 10935 (EPL 10935) is issued by the NSW Environment Protection Authority (EPA) under the POEO Act to Adderley Recycling Pty Ltd for the premises "Adderley Recycling – Auburn", 3–5 Duck Street, Auburn NSW 2144 (Lot 300 DP1228073). This revision of the OEMP has been prepared against the licence version dated 5 June 2026, as varied by notice POEO-1869 issued on 6 June 2026. The licence anniversary date is 1 August.

EPL 10935 authorises the following scheduled activities at the premises (condition A1.1), the scale of which is shown in Table 1-1:

- Resource recovery – recovery of general waste (any general waste recovered); and
- Waste storage – other types of waste (any other types of waste stored).

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 the licence (condition A3.1).

The conditions of EPL 10935 relevant to this OEMP and where they are addressed in this plan are summarised in Table 3-1. The full licence conditions are reproduced in Appendix B.

Table 3-1: Relevant EPL 10935 Conditions

Condition	Requirement (summary)	Document Reference
Administrative conditions		
A1.1	Scheduled activities authorised: resource recovery (recovery of general waste) and waste storage (other types of waste).	Section 3.3, Section 1.1
A2.1	Premises: Adderley Recycling – Auburn, 3–5 Duck Street, Auburn NSW 2144 (Lot 300 DP1228073).	Section 3.3
A3.1	Works and activities must be carried out in accordance with the proposal in the licence application.	Section 3.3
Limit conditions		
L1.1	Comply with section 120 of the POEO Act (pollution of waters).	Section 4.5, Section 4.6
L2.1	Only receive the wastes listed in the licence waste table, use them only for the listed activities and comply with any other limits.	Section 4.2.4, Section 4.2.8, Section 4.2.20.3

Condition	Requirement (summary)	Document Reference
L2.2 – L2.3	Foundry sand must be stockpiled within the premises building and separately to other materials.	Section 4.2.20.4
L2.4	Authorised amount of waste on the premises must not exceed 24,000 tonnes at any one time.	Section 4.2.20.6
L3.1	Noise limits at residential premises (Stubbs, Deakin, Newton and Beaconsfield Streets) and industrial boundaries.	Section 3.4.1, Section 4.9
L4.1	Crushing, grinding and separating only 7am–7pm Monday to Friday and 7am–1.30pm Saturday; not on Sundays or public holidays.	Section 2.3
L5.1	No potentially offensive odour is identified for the purposes of section 129 of the POEO Act.	Section 4.4.9
L6.1 – L6.2	Outdoor stockpiles must not exceed 4 metres; a stockpile height marker must be permanently installed.	Section 2.2.1, Section 4.2.20.1
Operating conditions		
O1.1	Licensed activities must be carried out in a competent manner.	Section 3.6, Section 4
O2.1	Plant and equipment must be maintained and operated in a proper and efficient manner.	Section 2.2.5, Section 4.4.10
O3.1 – O3.2	Minimise the generation of dust and prevent the emission of dust from the premises.	Section 4.4
O3.3	No material, including sediment or oil, is to be tracked onto the public road.	Section 4.7
O3.4	Loaded trucks entering and leaving the premises must be covered, except during loading and unloading.	Section 4.2.15
O3.5	All crushing, grinding and separating works must be carried out inside the buildings.	Section 2.2.6
O4.1	Prepare, maintain and implement a Pollution Incident Response Management Plan.	Section 6.4, Appendix C
O5.1	Assess and classify waste in accordance with the EPA Waste Classification Guidelines.	Section 4.2.1
O5.2 – O5.3	Stockpile each waste type separately; store all unprocessed waste inside the building.	Section 2.2.1, Section 4.2.8
Monitoring and recording conditions		
M1.1 – M1.3	Record and retain monitoring results and sampling details for at least 4 years.	Section 5.2
M2.1 – M2.4	Keep a legible record of all pollution complaints for at least 4 years.	Section 6.5
M3.1 – M3.3	Operate and publicise a telephone complaints line during operating hours.	Section 6.5

Condition	Requirement (summary)	Document Reference
M4.1	Keep a record of each load of Soil received and retain for at least 4 years.	Section 4.2.20.3
M4.2	Keep a record of each load of Foundry Sand received and retain for at least 3 years.	Section 4.2.20.4
Reporting conditions		
R1.1 – R1.3	Report any non-compliance with licence conditions via eConnect EPA within 21 days of becoming aware; provide further details on request.	Section 6.2.2, Section 6.6
R1.4	Transitional reporting of prior non-compliances via eConnect EPA by 5 August 2026.	Section 6.2.2
R1.5	Pollution monitoring data summary (if monitoring is undertaken) within 60 days of the end of each reporting period.	Section 6.2.2
R2	Notify the EPA of environmental harm via the Environment Line (131 555) and provide written details within 7 days.	Section 6.4
R3	Provide a written report of an event when requested by an authorised officer of the EPA.	Section 6.4
General conditions and pollution studies		
G1.1 – G1.3	Keep a copy of the licence at the premises and make it available to EPA officers and site personnel.	Section 6.2.3
U1	Sediment investigation report on vehicle sediment tracking, implementation of recommendations and effectiveness review.	Section 4.5, Section 4.7
Special conditions		
E1.1 – E1.5	Maintain a $220,000 financial assurance (bank guarantee) in favour of the EPA; replenish or increase as required.	Section 3.3.1
E2.1 – E2.3	Clean up spills, remove unlawfully deposited waste, provide monitoring data; emergency and post-closure obligations.	Section 3.3.1, Section 6.4.4
E3.1	The EPA may claim on the financial assurance under section 303 of the POEO Act.	Section 3.3.1

3.3.1 Financial Assurance and Environmental Obligations

Condition E1 of EPL 10935 requires a financial assurance of $220,000, in the form of an unconditional and irrevocable guarantee from an Australian bank, building society or credit union in favour of the EPA, to secure funding for works or programs required by or under the licence. The financial assurance must:

- be maintained during the operation of the facility and thereafter until the EPA is satisfied that the premises is environmentally secure (E1.2);
- be replenished by the full amount if the EPA claims on or realises any part of it (E1.3);
- be increased if required by the EPA following reassessment of the likely costs of rehabilitation of the premises (E1.4); and

- be supported by provision of the original counterpart guarantee to the EPA within five working days of its issue or adjustment (E1.5).

The EPA may claim on the financial assurance under section 303 of the POEO Act if the licensee fails to carry out any work or program required to comply with the licence (condition E3.1).

While the premises is used for the licensed activities, any spill, leak or other discharge of waste or other material must be cleaned up as soon as practicable, any waste unlawfully deposited on the premises must be removed and lawfully disposed of, and all monitoring data required by the licence or directed by the EPA must be provided (condition E2.1). Obligations in the event of an emergency are described in Section 6.4.4.

If the premises ceases to be used for the licensed activities, all liquid and non-liquid waste stored on the premises must be removed and lawfully disposed of, and the site must be rehabilitated, including an assessment and, if required, remediation of any site contamination (condition E2.3).

3.4 Relevant Criteria

3.4.1 Noise Criteria

Condition L3.1

Noise emissions from the operation of the premises must:

a) *not exceed an LA10,T (15 minute) noise emission criteria of 40 dB(A) during the day (7:00am and 10:00pm) when measured within one metre of any residential premises situated in Stubbs and Deakin Street Auburn; and*
b) *not exceed an LA10,T (15 minute) noise emission criteria of 45 dB(A) during the day (7 am and 10:00 pm) when measured t within one metre of any residential premises situated in Newton and Beaconsfield Street Auburn; and*
c) *not exceed an LA10,T (15 minute) noise emission criteria of 70 dB(A) during the day (7 am and 10.00 pm) when measured within one metre of any industrial boundary.*

5 d B(A) must be added to the measured level if the noise is substantially tonal or impulsive in character.

3.5 Roles and Responsibilities

The Bingo management representatives have an overall responsibility to ensure all workers working on-site are trained and aware of the OEMP and other site-specific information.

All staff on-site must complete a site induction/training relevant to the Site and their roles and responsibilities.

All workers/employees have a level of responsibility to ensure the operations are conducted in respect of the OEMP and EMS Procedures. Roles and responsibilities are outlined below.

The management structure for the Site is shown in Figure 3-1 and specific roles and responsibilities are presented in Table 3-2.

Table 3-2: OEMP Roles and Responsibilities

Role	Responsibilities
Chief Executive Officer / General Manager NSW	• Ensuring an OEMP is developed and implemented. • Ensuring appropriate resources are available to implement all aspects of the OEMP and maintain necessary records. • Endorsing the company's SEQ Policy.

Role	Responsibilities
Head of Safety and ESG Assurance	• Identifying environmental risks associated with the operations undertaken on-site. • Ensuring compliance with conditions of consent and any regulatory or other requirements. • Developing and implementing procedures and mitigating measures to minimise or eliminate any environmental risks identified. • Ensuring that all personnel undertaking work at the Site receive adequate training and education in the environmental measures developed to mitigate or minimise environmental risks at the Site. • Environmental auditing to ensure that the management measures adopted are effective. • Undertaking and reporting an internal audit annually. • Review maintain and assist implementation of the management system.
Site Manager / General Manager Operations NSW	• Assisting in the development, implementation and maintenance of mitigation measures to minimise or eliminate the identified environmental risks. • Complying with environmental measures and procedures implemented to minimise or eliminate environmental risks. • Maintaining on-site records and documents for inspection as required. • Attending environmental training and other educational sessions. • Reporting any environmental incidents that may occur in accordance with the OEMP. • Inducting all staff, workers and any person conducting or engaged by the company to complete and works on-site.
Staff and Workers	• Completing the Site induction. • Assisting management to mitigate any environmental hazards. • Ensuring that the Site is regularly inspected for potential hazards that may cause harm. • Attending environmental training and other educational sessions. • Continuous awareness of activities and processes that may have environmental impacts. • Reporting incidents promptly and assisting with implementing control measures as required.
Contractors and Subcontractors	• Completing the Site induction. • Identifying the environmental risks associated with their activities at the Site. • Developing mitigating measures to minimise or eliminate the identified environmental risks. • Being aware of and following on-site instructions and procedures implemented to minimise or eliminate environmental risks.

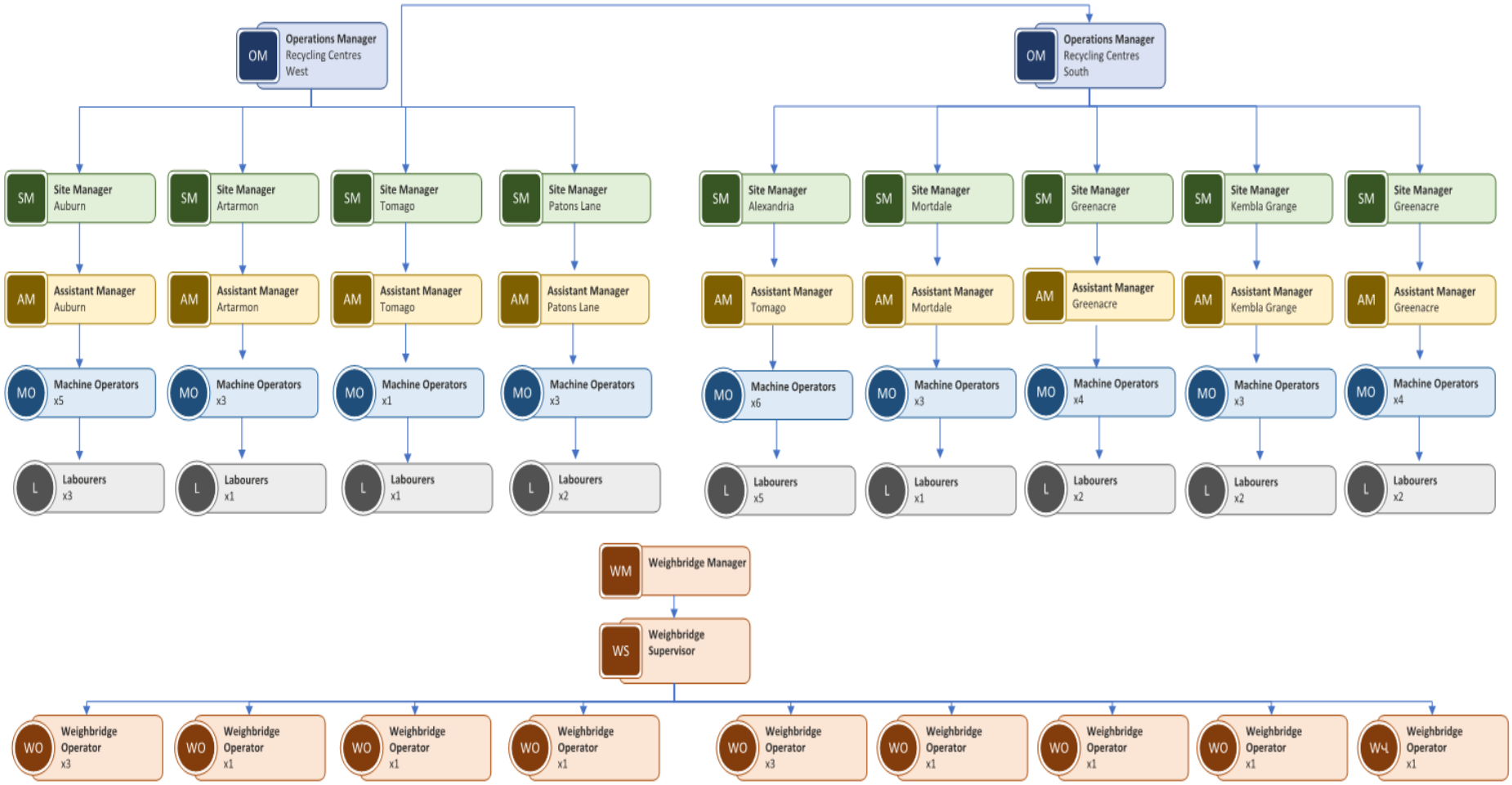


Figure 3-1: Management Structure

3.6 Training and Competence

3.6.1 Site Induction

Training and inductions are provided to all staff, subcontractors and visitors to ensure that they can perform their roles or undertake their responsibilities in a competent manner, understand how to assess environmental risks in relation to every task and to minimise these risks and the risk of harm. Site Inductions are the responsibility of the Site Manager/Supervisor or their delegate.

A summary of the induction includes:

- Site location and overview
- Traffic Management
- Site/emergency contacts
- Site facilities
- Emergency preparedness response and assembly points
- Site communication systems
- Community
- Public and visitor safety
- Incident hazards and faulty equipment
- Environmental practices.

In the event that there is an incident, staff, subcontractors and visitors are also trained to appropriately respond, including by notification of incidents that have potential to or cause environmental harm to the EPA and the CCC and other relevant stakeholders. Additionally, the Site has an Emergency and Pollution Incident Response Management Plan (EPIRMP) in place for outlining how the Site is to respond in the event of an incident that may cause environmental harm or risk to human health.

Refer to Appendix C – EPIRMP.

All staff that work at the facility must be aware of their environmental responsibilities and receive induction training to assist them to meet these responsibilities whilst on-site and to the extent possible whilst handling waste material. All staff, must receive training as identified in the Training Needs Register and as relevant to their role.

Training can take various forms, ranging from formal accredited training courses to site-specific inductions, daily toolbox talks and meetings. Training is based on Table 3-3 below and is delivered in accordance with each level of staff and by the nominated manager.

Table 3-3: Training Matrix

Staff Position (Staff Member)	Training to be provided	Person responsible for ensuring training provided
All workers, contractors and subcontractors where applicable to their role	• Spill Response Kits and locations • Chemical storage and other products • Safety Data Sheets (SDS) • Emergency information	• Site Supervisor or ARC Manager

Staff Position (Staff Member)	Training to be provided	Person responsible for ensuring training provided
	• Participation, lead and manage manual fire suppression, confinement, and response. • Evacuation assembly points • Emergency contact services and numbers • Environmental Impacts Management for: • Waste management, NCW and Asbestos • Weeds and Pests • Air Quality • Water • Dangerous Goods and Hazardous Materials • Noise • Emergency contact services and numbers • External complaints handling • Acceptance of fuel and other deliveries to site, which have environmental risks • Recording of off-site disposal of fluids. e.g. waste oils • Pollution incident and emergency response.	
Site Supervisor	• Site checking of environmental controls • Monthly reporting • Site Environmental auditing • Compliance with the consents, permits, licenses, etc. • Environmental Aspects and Impacts Register • OEMP and sub plans • EPIRMP • All procedures identified in the Training Needs Register for the Site Supervisor.	• ARC Team or ARC Manager

Employees are appointed on the basis that they have the skills required to perform their duties. It is recognised that to retain competent staff, employees must remain aware of the changing nature of their workplace, laws and regulations and other aspects and impacts that affect their ability to do their job well and in accordance with company expectations.

Bingo ensures that staff are:

- Competent for the work they are required to do
- Trained in relation to the environmental aspects and impacts and mitigation measures that affect their work
- Confident in identifying training needs and environmental impacts
- Supervised

- Provided with access to additional training including from external providers where appropriate.

A visitor is a person who attends the work site and does not participate in any work activities.

3.6.2 Job Pre-Start

In addition to the Site Inductions, a safety/environmental meeting is conducted and undertaken together with daily Job Pre-Start discussions prior to high-impact activities. A Job Pre-Start discussion is a short discussion of health, safety and environmental requirements delivered at the commencement of a shift that is usually directly applicable to the work about to be undertaken.

3.6.3 Additional Training

Where it is identified that specific skills are required for specialised tasks, the ARC Manager (or their delegate) must ensure that the appropriate training is completed by the employee.

A Training Needs Register has been developed to identify all employees' minimum competency requirements. A training register is maintained by BI for all training undertaken.

4 IMPLEMENTATION

This section addresses the key environmental aspects associated with the operation of the ARC and the environmental controls established to manage the associated risks.

4.1 Aspects, Impacts and Risks

A risk management framework is provided for identifying, assessing and reducing the risks associated with the activities that have the potential to impact the environment. Refer to Appendix D – Environmental Risk Assessment and Mitigation Measures.

The ARC OEMP contains an Environmental Risk and Mitigation Register applicable to the risks associated with operation of the ARC.

When planning and conducting work, SWMSs are used to document tasks and identify and control environmental risks.

All work should be planned in a way that effectively manages the identified environmental hazards.

ARC understands the importance of managing risk. ARC will, so far as it is reasonably practicable, identify environmental hazards that are associated with the activities, processes, products and services under the management and control of ARC to eliminate, minimise, control and monitor environmental risks, they are first assessed, and then suitable measures implemented.

An environmental risk assessment of all activities at the Site was undertaken and is used to determine appropriate controls and develop/revise procedures and controls. Subsequent assessments are conducted:

- Before new processes or activities are introduced
- Before changes are introduced to existing processes or activities, including when products, machinery, tools, equipment change or new information concerning harm becomes available
- When environmental hazards are identified.

These aspects and impacts are specifically addressed in Section 4, which includes:

- Waste Management
- Weeds, Pests, Animal Management
- Air Quality Management
- Greenhouse Gases Emissions
- Odour
- Dangerous Goods and Hazardous Materials Management
- Noise Management
- Water Quality and Stormwater Management
- Sediment Tracking.

4.1.1 Risk Management Strategy

In order to ensure that risks are identified and managed in a consistent manner, SOP-SEQ002 Procedure for the Identification and Management of Risk is applied.

4.1.2 Reporting Risk

The Site is to follow SOP-SEQ002 to report and follow up in relation to risks identified.

All risks regardless of their likelihood or consequence are notified and reported to the Site Supervisor as soon as reasonably practicable and in the case of an incident, no later than 24 hours following an environmental incident.

Environmental aspects that result in a residual risk of High or Very High are deemed significant environmental risks. Significant environmental risks are escalated and reviewed by upper management.

4.1.3 Control of Risk

Where possible, application of risk mitigation focuses on a top-down approach whereby Very High risks are controlled first.

Examples of mitigation measures may include eliminating the activity altogether, substituting the item for something less hazardous which will perform the same function, guarding of moving parts, provision of training and competency assessment, licensing requirements, signage, development of or modification to safe work procedures or identification of personal protective equipment.

Standard Operating Procedures (SOPs) and the need to update them are to be considered when conducting risk assessments. Alternatively, new SOPs may be required to address new and additional risks. In addition, consideration must be given to any updates or additions to the Environmental Risk and Mitigation Register and employee re-education and training and additions or changes to the Training Needs Register.

Different or additional control measures may be required for environmental impacts that occur when operating outside normal conditions. For each aspect and impact, determine if procedures are required to address environmental aspects if operating outside normal conditions or in emergencies.

4.1.4 Review Control Measures

Mitigation measures are to be reviewed regularly to make sure they work as planned. Certain situations where control measures are reviewed and revised can include:

- If the control measure is not effective in controlling the risk
- If a change occurs at the workplace that is likely to give rise to a new or different risk or impact that the control measure may not effectively control
- If a new hazard or risk is identified
- As the result of an incident
- As a result of an internal or external review.

4.1.5 Record Keeping

Risk assessments and risk controls are documented in:

- Environmental Aspects and Impacts Register
- Completed JSEAs/SWMSs
- Incident investigation reports.

Keeping records of the risk management process demonstrates potential compliance with any Act or Regulation. It also helps when undertaking subsequent risk assessments. Keeping records of the risk management process has the following benefits:

- Allows us to demonstrate how decisions about controlling risks were made
- Assists in targeting training at key hazards, aspects and impacts

- Provides a basis for preparing SOPs and Safe Work Method Statements (SWMSs)
- Allows us to more easily review risks following any changes to legislation or business activities
- Demonstrates to others (regulators, customers) that work health and safety, and environmental risks are being managed.

All employees are required to comply with identified controls and give feedback on their effectiveness.

4.1.6 Review and Monitoring

The Environmental Manager periodically reviews the environmental aspects and impacts and updates the Site Environmental Risk and Mitigation Register if required in consultation with the Site Supervisor. The Environmental Risk and Mitigation Register is a part of the EMS and is available upon request.

4.2 Waste Management

4.2.1 Waste Acceptance

This plan details management and control measures for the receipt, storage, processing, recovery, transport and disposal of wastes at the ARC.

Waste must be received and managed in accordance with condition L2 of EPL 10935, issued under the Protection of the Environment Operations Act 1997 (POEO Act).

Waste accepted on-site are consistent with the materials classified as general solid Waste (non-putrescible) as pre-classified within the NSW EPA Waste Classification Guidelines and as permissible under the POEO Act and associated Regulations.

The following definitions relating to this operation are taken from the NSW Environment Protection Authority (EPA) Waste Classification Guidelines. The following information has been copied from Part 1: Classifying Waste (November 2014).

4.2.2 Applicable Legislation, Guidelines or Procedure

Refer to Appendix B.

4.2.3 Waste Source Control

Customers are screened with Terms and Conditions and the types of wastes accepted. Once the Terms and Conditions are agreed with by each customer, the Sales Team books in a job.

The majority of waste arrives on-site as mixed waste. Mixed loads of building and demolition, commercial, industrial and domestic materials as well as single material loads are received on-site typically as clean construction and demolition materials such as bricks, tiles, concrete, aggregate, crushed concrete and bricks, rock, soils and soils like materials or any combination of these. This mostly heavy material is recoverable for recycling.

At ARC, the waste undertakes a basic sort and screen of non-conforming wastes and combustible recyclable and waste materials.

4.2.4 Waste Receipt

Condition L2.1 of EPL 10935 provides that the licensee must not cause, permit or allow any waste to be received at the premises except the wastes listed in the licence waste table, which are reproduced in Table 4-1. Wastes received may only be used for the activities listed against them and are subject to the other limits specified for each waste.

Table 4-1: Wastes Permitted under EPL 10935 Condition L2.1

Waste	Activity	Other Limits
Garden waste	Resource recovery, waste storage	Must be removed from the premises within 48 hours of arrival. Cannot be stored on Sundays or public holidays.
Household waste from municipal clean-up that does not contain food waste	Resource recovery, waste storage	Must be removed from the premises within 48 hours of arrival. Cannot be stored on Sundays or public holidays.
Non-chemical waste generated from manufacturing and services (including metal, timber, paper, ceramics, plastics, thermosets and composites)	Resource recovery, waste storage	NA
Office and packaging waste (including paper, plastics, glass, metal, timber) that is not contaminated or mixed with any other type of waste	Resource recovery, waste storage	NA
Asphalt waste (including asphalt resulting from road construction and waterproofing works)	Resource recovery, waste storage	NA
Soils	Resource recovery, waste storage	Arsenic 40 mg/kg; Cadmium 2 mg/kg; Copper 200 mg/kg; Mercury 1.5 mg/kg; Zinc 600 mg/kg; Petroleum Hydrocarbons C6–C9 150 mg/kg; Petroleum Hydrocarbons C10–C36 1,600 mg/kg; Polycyclic aromatic hydrocarbons 80 mg/kg; Polychlorinated biphenyls (individual) 1 mg/kg. No Acid Sulfate Soil or Potential Acid Sulfate Soil is to be received at the premises. Soil thresholds will be subject to review from time to time.
Building and demolition waste	Resource recovery, waste storage	NA
Virgin excavated natural material	Resource recovery, waste storage	NA
Foundry sands	Resource recovery, waste storage	–

Definitions of waste types relevant to the operation of the ARC are provided in Table 4-2.

Table 4-2: Waste Definitions

Term	Definition
Building and Demolition Waste	means unsegregated material (other than material containing asbestos waste) that results from:

Term	Definition
	• the demolition, erection, construction, refurbishment or alteration of buildings other than: • chemical works, or • mineral processing works, or • container reconditioning works, or • waste treatment facilities, or • the construction, replacement, repair or alteration of infrastructure development such as roads, tunnels, sewage, water, electricity, telecommunications and airports, and includes materials such as: bricks, concrete, paper, plastics, glass and metal, and timber, including unsegregated timber, that may contain timber treated with chemicals such as copper chrome arsenate (CCA), high temperature creosote (HTC), pigmented emulsified creosote (PEC) and light organic solvent preservative (LOSP) but does not include excavated soil (for example, soil excavated to level off a site prior to construction or to enable foundations to be laid or infrastructure to be constructed).
Virgin excavated natural material	• that has been excavated or quarried from areas that are not contaminated with manufactured chemicals, or with process residues, as a result of industrial, commercial, mining or agricultural activities, and • that does not contain sulfidic ores or soils, or any other waste, and includes excavated natural material that meets such criteria for virgin excavated natural material as may be approved from time to time by a notice published in the NSW Government Gazette.
Soil	Soil means soil that meets CT1 thresholds for General Solid Waste in table 1 of the Waste Classification Guidelines as in force from time to time with the exception of the maximum threshold values for contaminants specified in "Other Limits" in the EPL.
Wood Waste	means sawdust, timber offcuts, wooden crates, wooden packaging, wooden pallets, wood shavings and similar materials, and includes any mixture of those materials, but does not include wood treated with chemicals such as copper chrome arsenate (CCA), high temperature creosote (HTC), pigmented emulsified creosote (PEC) and light organic solvent preservative (LOSP). Additional wastes may be classified as general solid waste (non-putrescible) by the EPA from time to time by a notice published in the NSW Government Gazette. All currently gazette general solid wastes (non-putrescible) are listed on EPA's website at www.environment.nsw.gov.au.
C&I	Commercial and Industrial (C&I)
Green waste	means waste that consists of branches, grass, leaves, plants, loppings, tree trunks, tree stumps and similar materials, and includes any mixture of those materials.

4.2.5 Standards for Managing Construction Waste in NSW

Auburn Recycling have adopted the Standards for Managing Construction Waste which include:

- Implement waste inspection requirements
- Implement the waste sorting requirements
- Implement the waste storage requirements, and
- Comply with transport requirements.

4.2.6 Waste Inspections

All loads to enter the Site undergo a number of visual inspections as outlined in Figure 2-3 prior to sorting on-site.

A visual inspection on the weighbridge occurs prior to entering the yard and prior to unloading on the tip floor. An additional visual inspection is conducted on the tip floor after waste is tipped prior to material placement on a stockpile or into a bin.

The Site Supervisor must get information about the load to be tipped prior to tipping. The purpose of understanding the nature and contents of the load prior to tipping is to ensure maximum resource recovery, control and isolation of potential contaminants and to activate emissions or pollution controls should they be required.

The Site Supervisor requests information from the driver about the contents of the load while the driver is inbounding to Site and prior to the vehicle being able to proceed to the tipping floor. The Site Supervisor and staff/workers first inspect the waste prior to unloading, then during unloading, and after unloading, to determine waste acceptability.

Management of non-conforming waste (NCW) is in accordance with procedures and NCW that is rejected is recorded on the Rejected Load Register located in the Weighbridge.

The following options are assessed based on risk to the environment and human health. NCW may therefore be:

- Not unloaded and the load rejected prior to tipping, or
- Rejected following tipping, reloaded and charged a reloading fee, or
- Separated from load and reloaded for transport off-site by customer or contained and managed appropriately on-site prior to disposal within permitted timeframes.

From time-to-time small quantities of NCW are still hidden and may be discovered later. These NCW wastes are set aside, then stored, transported and disposed of according to procedures. Refer to Section 4.2.12.

4.2.7 Waste Sorting

Mobile plant and equipment are used by ARC employees who are trained and experienced operators with Safe Work Method Statements (SWMS) in place. Competency assessments are conducted on mobile equipment operators on a regular basis.

Mobile plant and equipment are used as part of the waste screening process where waste materials are sorted into separate stockpiles and then transported to Eastern Creek.

4.2.8 Waste Storage

Waste storage on-site is temporary and subject to availability of transport and markets for product.

The Site has the capacity and capability to manage waste efficiently and professionally. The Site's objective is to facilitate maximum resource recovery and to source additional processing facilities and/or markets for recovered materials where feasible, financially viable and lawful.

The stock management objectives are as follows:

1. Identification and removal of hazardous materials or NCW (e.g. batteries, hazardous liquids)
2. Identification and removal of highly combustible materials or NCW (e.g. tyres, mattresses)
3. Sorting and separating large recoverable items (e.g. large concrete, steel, plasterboard)

4. Transporting each day, the above materials to Bingo Eastern Creek.

In accordance with condition L2.1 of EPL 10935, garden waste and household waste from municipal clean-up must be removed from the premises within 48 hours of arrival and must not be stored at the premises on Sundays or public holidays.

4.2.9 Resource Recovery

Where materials are recovered for reuse under Resource Recovery Orders and Exemptions, the ARC processes and procedures for the weighbridge, stockpile management and recovered material management must be followed. These are included in SEQ Management System documentation.

The site recovers soils from mixed waste and these soils must undergo a screening process on-site. Soils are also delivered to site as clean material that meets the CT1 threshold requirements within the NSW EPA Waste Classification Guidelines Part 1 and EPL limits. Following processing, these soils are tested to determine if they meet the requirements of "The Continuous Process Recovered Fines Order 2014".

Other materials can be derived from mixed waste and clean construction and demolition waste, including aggregate. Aggregate may be processed and stockpiled on-site. Where this occurs, it must be sampled and managed in accordance with the Recovered Aggregate Resource Recovery Order.

On rare occasions, the site may receive a load of material classified as ENM. This material is separately stockpiled until a market can be found.

Resource Recovery Orders that may be applicable include the following:

- Excavated natural material order and exemption
- Recovered aggregate order and exemption
- Recovered fines (continuous) order and exemption.

4.2.10 Composting

Garden waste materials received on-site are typically contained in the contents of skip bins mostly from household clean up mixed waste or demolition-sites. Garden waste is picked and separated for recycling. The waste contains stumps, thick branches and other garden waste. The size and nature of this material means that it is not able to be mulched, chipped or reused on the generators on-site and requires processing before it can be sent to a third party facility for composting or before it can be sent to a suitable market.

There is no chipping, mulching or composting on-site. All material, if found, is transported off-site to a local facility approved for this type of processing before they can be sent to a suitable market.

4.2.11 Combustible Recyclable and Waste Materials

Combustible recyclable and waste materials (CRWM) is defined as recyclable and waste materials that could create a fire hazard. They include but are not limited to:

- Paper and cardboard
- Wood
- Plastic
- Rubber, tyres, and tyre-derived waste
- Textiles
- Organic material

- Refuse-derived fuel (RDF)
- Specified electronic waste (e-waste)
- Metal and other materials with combustible contaminants
- Combustible by-products of metal processing activities.

CRWM materials are identified and sorted into a separate stockpile for removal to landfill.

4.2.12 Non-Conforming Waste

Each load is inspected to ensure hazardous and unwanted materials are appropriately managed on-site in a manner that minimises the risk of harm to the health of our employees or the local environment. NCW are not permitted on-site, however, NCW may still find their way on-site.

Each load is inspected by a trained spotter and the following items if identified are removed and stored safely on-site prior to being removed by a licensed contractor.

NCWs received can include the following:

- Tyres
- Gas bottles/Fire extinguishers
- Liquids, chemicals and paints
- Batteries
- Putrescible wastes
- Asbestos (discussed below).

4.2.13 Asbestos

ARC does not accept NCW such as asbestos wastes. Customers are advised of which waste types are prohibited on-site.

If asbestos is found in tipped material, they are managed in accordance with SEQ procedures and other relevant documents. Management of asbestos received on-site will be undertaken in accordance with SEQ procedures and conform with EPL requirements.

4.2.14 Contingency Plan

Peaks and troughs of material volumes are expected to come through the Site throughout the year. This is reflective of the activity of the industries producing waste materials.

To mitigate the risk of waste accumulating on-site when high volume periods are predicted, flexible arrangements with haulage contract partners are put in place. These arrangements allow ARC to add more transport capacity to the fleet to maintain service during peak periods.

ARC's contingency plan if bulk haulage is not sufficient is to transport the landfill material (CRWM) via the Bingo truck fleet in 30m^3 bins.

4.2.15 Litter Management

Litter control is a factor of housekeeping that requires daily attention. Litter generating activities and weather conditions are monitored. A combination of controls to manage and prevent litter and to prevent litter escaping the Site are in place.

Litter generally occurs:

- During the untarping process in preparation for tipping at the tip floor
- During the sorting process where wind or vehicle movements cause litter to become mobile

- During the loading process
- During departure from the Site.

Mitigation measures for the purpose of litter management include:

- The Site is fully fenced with shade cloth attached to key risk areas
- Adjustments such as delayed untarping to suit weather conditions
- Tipping and loading are performed internally
- Site and road checks are performed.

4.2.16 Transport and Disposal

Materials transport and disposal occurs in accordance with OEMP procedures and processes.

Typically, Bingo Industries supplies a truck fleet for off-site disposal of CRWM. Where material is transported in bins rather than in bulk (walking-floor, truck and dog), Bingo typically transports the bins to a recycling facility or landfill as appropriate.

4.2.17 Waste Tracking

Waste tracking for certain waste types or from certain generator locations is a requirement of the Protection of the Environment Operations (Waste) Regulation 2014 ("the Waste Regulation"). The Waste Regulation came into force on 1 November 2014.

Waste required to be tracked includes, for example:

- Trackable waste – types 1 and 2
- Waste generated in the metropolitan levy area (MLA) and transported for lawful purposes outside the MLA
- Special waste – tyres and asbestos.

Waste dockets are signed by the truck drivers confirming they are not carrying NCW. These are then collated and entered into the Bingo waste tracking system indicating the type of material in the load and the volume size of the track bin.

Customers are advised that these waste types are prohibited on-site. Any material suspected of being trackable waste is rejected and management system procedures followed.

The waste described in Schedule 1 of the Regulation is required to be tracked when transported. It may be exempt if it does not have any of the characteristics also listed in Part 3 of Schedule 1.

4.2.18 MLA Waste Tracking

The Waste Regulation requires that waste generated in the MLA is to be tracked if transported anywhere outside of the MLA if it is to be transported more than 150 kilometres. The reporting of transport of material more than 150 kilometres outside of the MLA requires the use of the EPA OWT – MLA online portal.

Site Supervisors are responsible for creating a Consignment Templates and Transport Reports.

Waste, if it is to be transported more than 150 kilometres, is required to be reported in accordance with the Regulation and EPA requirements.

4.2.19 Special Waste – Asbestos and Tyres

ARC does not accept or transport Special Waste. Customers are advised that these waste types are prohibited on-site. Any material suspected of being Special Waste is rejected if found prior to the customer leaving the site and SEQ Management System procedures followed.

If asbestos or tyres are found in tipped material, they are managed in accordance with SEQ procedures and other relevant documents including the Asbestos Management Plan (AMP). Any transport of asbestos or tyre waste off-site is reported using the EPA's Waste Locate portal.

Refer to the relevant procedures for classification, acceptance, transport and disposal of trackable or reportable/non-trackable waste.

4.2.20 Special Considerations

4.2.20.1 Stockpile Height

Stockpiling on-site is limited to the extent required by the development consent and the EPL for the site. Stockpiles are managed in accordance with NSW EPA Waste Levy Guidelines, the *Protection of the Environment Operations Act*, the site Environment Protection Licence and this OEMP.

4.2.20.2 Special Waste – Asbestos and Tyres

Asbestos is a potential NCW find. The SEQ Management Plan and associated procedures address unexpected finds of special waste. Specifically, the below procedures apply if waste materials are suspected of containing asbestos.

- SOP-YA020 Unexpected Asbestos Finds - Site
- SOP-OP006 Using Waste Locate
- SOP-YA001 Tipping Loading at Recycling Centres
- SOP-YA003 Asbestos at Recycling Centres
- SOP-YA016 Incident Resulting in Airborne Asbestos.

If waste materials are suspected to contain asbestos, they are treated as asbestos regardless.

Single tyres are a rare find in inbound waste. Tyres, if found, are set aside and transported to a local tyre recycler for recycling. Transport of tyres is reported to EPA using the online Waste Locate portal where the number of weight of tyres exceeds the regulated threshold.

4.2.20.3 Soils

Soil may be recovered from mixed waste tipped on-site. Mixed waste is stockpiled for processing. Most soil recovered on-site is from mixed waste from construction and demolition works and household clean-up projects delivered in skip and hook bins. Processing of waste on-site results in recovery of fine (small particle materials that are 9.5mm or less. Soil (being recovered material that is 9.5mm or less) where required is managed in accordance with the conditions of the relevant Resource Recovery Order and Exemption (RRO&E). Where required, soils are transported to licenced recycling facility for further processing to remove mixed waste materials that cannot be separated on-site or for disposal.

Soils received at the premises must not exceed the contaminant thresholds specified for soils in condition L2.1 (Table 4-1), and no acid sulfate soil or potential acid sulfate soil is to be received. A record must be kept of each load of soil received, including a copy of the waste classification report, the quantity (tonnes), the date and time received, the registration number of the delivery vehicle, the name and contact details of the deliverer and the source address. Soil records must be retained at the premises for at least four years and produced to an authorised officer of the EPA on request (condition M4.1).

4.2.20.4 Foundry Sand

Foundry sand may be received at the premises for resource recovery and waste storage (condition L2.1). Foundry sand must be stockpiled within the premises building and separately to other materials (conditions L2.2 and L2.3).

A record must be kept of each load of foundry sand received, including a copy of the certifying statement of compliance in accordance with The foundry sand in recovered aggregate exemption 2008 (including the characterisation and limits in Table 2 of the exemption), the quantity (tonnes), the date and time received, the registration number of the delivery vehicle, the source address and the name and contact details of the deliverer. Records must be retained at the premises for at least three years and produced to an authorised officer of the EPA on request (condition M4.2).

4.2.20.5 Sampling

If a material is subject to a Resource Recovery Order and Exemption (RRO&E), and if the site is approved to store and process that material, the site employs a consultant to conduct sampling and analysis of that material in accordance with the relevant RRO&E.

Suitably qualified independent third-party consultants undertake sampling and analysis. ARC uses pre-approved preferred suppliers that meet Bingo's minimum standards for preferred suppliers.

4.2.20.6 Authorised Amount

The site is required to comply with limits applied by the EPA related to the amount of waste that can be stored at any one time on the premises. This is an 'authorised amount' and is a limit for the purposes of the waste levy and a site waste threshold. The Authorised Amount is a condition of the EPL where applicable to the site.

The authorised amount of waste permitted on the premises cannot exceed 24,000 tonnes at any one time.

4.2.20.7 Weighbridge Operation

Weighbridge operation procedures are included in the SEQ Management System. This ensures that all incoming and outgoing vehicles whether transporting waste or not, are recorded in Tipwatch in accordance with relevant laws and SEQ Management System procedures.

A weighbridge has been installed as required by the POEO Act and Waste Regulation. Data is recorded in Tipwatch in accordance with the NSW EPA Waste Levy Guidelines and SEQ management system procedures.

4.2.21 Risk Management and Control

- Customer Terms and Conditions defines what wastes are permitted to be accepted.
- Waste inspections at the tip floor, sorting and processing areas.
- Concrete sealed surfaces prevent dust being generated from crushed rock unsealed areas.
- Portable water cart and sprays are applied to unsealed surface areas.

4.2.22 Monitoring

Table 4-3: Waste Monitoring

	Mitigation Measures and Safeguards	Timing	Responsibility
1	Only conforming waste materials are to be received and processed	Daily/Ongoing	Site Supervisor/ Site Manager
2	Non-conforming waste materials are to be screened out of the processing stage, sent back with customers, or stored and then transported out in accordance with applicable procedures	Daily/Ongoing	Site Supervisor/ Site Manager

	Mitigation Measures and Safeguards	Timing	Responsibility
3	Waste materials are to be stored in accordance with applicable guidelines	Daily/Ongoing	Site Supervisor/ Site Manager
4	Stored amounts or receipt of waste materials are not to exceed Environment Protection Licence requirements	Daily/Ongoing	Site Supervisor/ Site Manager
5	Waste materials are not to leave site in an uncontrolled manner	Daily/Ongoing	Site Supervisor/ Site Manager

4.2.23 Measurable Targets

Table 4-4: Waste Targets

Target	Measurement
Waste received is in accordance with the Environment Protection Licence and Bingo's Terms and Conditions	Site Records
On-site waste is stored and managed in accordance with the relevant guidelines	Inspection Records
Waste transported off-site is sent to a lawful place	Site Records
No complaints regarding waste from the local community	Complaints Register

4.3 Weeds and Pest Animal Management

4.3.1 Background

During operation of the ARC the focus is on routine monitoring and treatment of weeds and pests as they become apparent.

The ARC is fully operational with areas of hardstand with lawn and garden area adjacent to the entrance into the Site. Weed growth is generally present as part of the garden areas but also on boundary areas of the Site.

4.3.2 Objectives

- Ensure that operation of the ARC does not provide areas of harbour for pests to shelter or breed.
- Ensure operation of the ARC does not increase pest animal and weed populations.
- Avoid introducing new weeds and pests to the area or exacerbating the spread of existing weeds.

4.3.3 Potential Impacts

Operation of the ARC could lead to the harbouring and spread of weeds and pest animals via:

- Removing areas of native vegetation
- Disturbing or breaking ground
- Allowing build-up of materials or build-up of materials in unapproved areas
- By not performing regular treatment for weeds and pest animals

- Application of poor housekeeping practices.

4.3.4 Risk Management and Control

- New construction and/or maintenance works will avoid or minimise unnecessary disturbance or breakage of ground.
- Weed and pest animal control will continue on a regular basis such as weed treatment rodent baiting stations where required.
- Rodent baiting stations where installed are checked and maintained according to the suppliers' and pest controllers' recommendations.
- Regular inspections are made of the Site to assess pest activity and mange appropriate pest control measures as required.
- Large areas of weeds can be removed by the application of non-residual herbicides.
- The location of surface water, drainage areas, native vegetation and animals must be considered with application and/or storage of herbicides to avoid adverse environmental impact.
- Ensure no ponded water (water source).
- Putrescible waste generated by staff on-site are to be placed in a lidded commercial waste bin which is to be kept closed when not in use and regularly disposed of.

4.3.5 Monitoring

Table 4-5: Weeds and Pests Monitoring

	Mitigation Measures and Safeguards	Timing	Responsibility
1	Weed and pest animal monitoring will continue on a regular basis such as weed treatment and rodent baiting stations where required.	Daily/Ongoing	Site Supervisor

4.3.6 Measurable Targets

Table 4-6: Weed and Pest Animal Targets

Target	Measurement
No significant increase in weed cover or presence of pest species	Inspection records

4.4 Air Quality Management

4.4.1 Background

Dust emissions from management and movements of wastes may have the potential to affect the local air quality without adequate controls in place. Airbourne dust can be generated from the handling and management of waste as it is unloaded, processed and reloaded. Movement of vehicles around Site can also create airborne dust. Risks posed by dust are also related to the context of the receiving environment.

Air quality impacts are mitigated by means of the following staged approach. The measures are hierarchical with dust prevention being key:

1. Prevention - ways and means to prevent
2. Minimisation - ways and means to minimise

3. Control - ways and means to control or manage an impact.

Many of the procedures are common to one or more of these dust management options, and a clear distinction may not exist between prevention, minimisation and control.

In the event of an uncontrolled emission or if a complaint regarding air quality is received, the EPIRMP is to be implemented. The EPIRMP is discussed in Appendix C.

4.4.2 Potential Impacts

Dust is defined as "solid particulate matter (of mineral or biological origin) capable of temporary suspension in the air, smaller than grit, larger than smoke, with a maximum size of 100 micrometres." (Ref: NSW EPA).

The potential on-site and off-site sources of dust at ARC are fugitive emissions or diffuse sources via:

- Unloading (waste inwards)/loading (waste outwards) of vehicles
- Processing of materials
- Passage of vehicles over sealed surfaces and other site traffic.

4.4.3 Loading/Unloading of Vehicles

Rigid trucks or truck and trailer combinations are loaded by a front-end loader with waste that will either be disposed of or sent off-site to be repurposed. Dust can potentially be generated during the loading-out process. Dust is minimised by tipping the front-end loader bucket slowly from a minimum height (consistent with preventing damage to the truck body.

4.4.4 Processing Area and Sorting of Materials

With the machinery used in the processing area such as mobile plant (front-end loaders and excavators) that load and transfer materials into the processing area, appropriate dust suppression measures are applied, and dust control needs are assessed at least daily and as weather conditions change.

Dust minimisation and control for mobile plant is via water sprays and by careful use of the loader or excavator bucket.

4.4.5 Surfaces and Vehicles on the Site

The passage of vehicles across the Site spreads and distributes particulate material, promotes drying, and can cause the material to become airborne or tracked out and deposited onto the local road network.

When the material is wet it becomes "mud" and can also be tracked on-site and off-site before drying to a fine dust. Removal of fine material through mechanically sweeping the paved areas around the Site minimises mobilisation of dust. Dampening/watering of on-site roadways is to be carried out at the first appearance of airborne dust following vehicles travelling on the internal roads and surfaces.

Portable devices are used to remove mud and other debris from tyres and prevent it being tracked from the Site.

The surfaces are regularly maintained by an on-site water cart which is used to keep hardstand areas and roadways clear of sediment.

4.4.6 Risk Management and Control

Table 4-7 below details the air quality risks associated with operation of the ARC and subsequent control measures.

Table 4-7: Air Quality Risk Management Strategies and Controls

Risk	Potential Source	Cause	Controls
Fugitive Dust	Stockpiles – CRWM	• Wind blown	• No stockpiles on-site.
	Processing area	• Wind-blown. • Loaders, excavators, bulldozer movement	• Impact from wind is minimal • Prevailing wind conditions and weather forecast information to be reviewed • Handheld hoses are available when required.
	Loading/ unloading waste	• Loaders, excavators, bulldozers	• Prevailing wind conditions and weather forecast information to be reviewed • Handheld hoses are available when required • Careful loading and unloading practices • Operational activities account for weather conditions that may cause dust impacts • Handheld hoses are available when required.
	Vehicle movement	• Loaders, excavators, bulldozers • Site vehicles • Customer vehicles	• Prevailing wind conditions and weather forecast information to be reviewed • Site surfaces are sealed concrete prevent dust emissions from crushed rock surfaces • Site surfaces are maintained by an on-site water cart on a daily basis • External road sweeping services are employed weekly for on-site areas and the local road network • Limit vehicle speeds to 5km/hr. • All loads to be covered except during loading and unloading.
Other Emissions	Vehicles, plant or equipment	• Exhaust from vehicles, plant or equipment	• Prevailing wind conditions and weather forecast information to be reviewed • Identify any vehicle, plant or equipment that is causing visible emissions and repair as needed • All on-site, fixed and mobile diesel-powered plant are maintained in accordance with the manufacturers' specifications.

4.4.7 Monitoring

Table 4-8: Air Quality Monitoring

	Mitigation Measures and Safeguards	Timing	Responsibility
1	Prevailing wind conditions and weather forecast information to be reviewed.	Daily/Ongoing	Site Supervisor/ Site Manager

	Mitigation Measures and Safeguards	Timing	Responsibility
2	Daily inspections to identify any vehicle, plant or equipment that is causing visible emissions (should not be longer than 10 sec of continuous visible emissions). Notify Site Supervisor of any defective emission control.	Daily/Ongoing	All site staff
3	Internal and external road sweeping services are employed.	Daily/Ongoing	Site Supervisor/ Site Manager
4	Vehicle, plant and equipment is operated in a competent way, turn vehicles off when not in use or idling for long periods of time.	Daily/Ongoing	All site staff
5	Apply water to exposed surfaces that are causing dust generation. Surfaces may include unpaved roads, stockpiles, hardstand areas, other exposed.	Daily/Ongoing	Site Supervisor/ Site Manager
6	Visually monitor daily operation activities to ensure controls are effective.	Daily/Ongoing	Site Supervisor/ Site Manager
7	Prevent where possible, or remove, mud and dirt being tracked onto sealed road surfaces.	Daily/Ongoing	Site Supervisor/ Site Manager

4.4.8 Measurable Targets

Table 4-9: Air Quality Targets

Target	Measurement
No complaints regarding air quality from the local community	Complaints Register

4.4.9 Odour Emissions

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 potentially offensive odour and the odour was emitted in accordance with conditions of licence directed at minimising odour.

Odorous materials such as putrescible waste are not accepted on-site. The source of putrescible materials unexpectedly found in materials on-site is most likely to be lunch scraps from workers on buildings sites. Food scraps are immaterial in the waste received on-site. Where identified, they are separated and stored in a commercial waste bin on-site for proper disposal.

A commercial waste bin on-site contains office waste, waste from staff amenities such as the staff lunchroom and from time-to-time putrescible waste found in tipped material. The commercial waste bin is serviced at least weekly.

Dust, exhaust emissions and odour have the potential to affect air quality. This section deals with exhaust emissions being potential emissions arising from use of on-site equipment and trucks transporting waste to and from the site. This section also deals with potential odour emissions arising from the waste types managed on-site under certain circumstances and from leachate that may be generated if water was to encounter these wastes. Small amounts of green waste are

received on-site, usually as part of a mixed load of waste. Manual separation of green waste occurs on the tip floor. It is separately stockpiled undercover in a dedicated storage bay or bin. Green waste is removed from site on average on a weekly basis and has no time to decompose on-site and cause odour.

Given the above, green waste and putrescible materials are highly unlikely to generate any significant odour. The potential for odour nuisance as assessed in the risk aspects and Impacts Register is unlikely and of insignificant consequence and is therefore rated as low.

4.4.10 Exhaust Emissions

The burning of fuel by combustion engines has the potential to result in odour caused by the products of fuel combustion, which can be particulate or gaseous in nature. These emissions are minor and rated as a low risk in the site Risk, Aspects and Impacts Register.

Preventative, routine and emergency maintenance programs are in place for on-site equipment. Emissions of this nature are managed within the equipment maintenance programs. All equipment maintenance is coordinated and managed by the head office workshop and is determined in conjunction with the Site Supervisor and Chief SEQ Officer.

4.5 Water Quality Management

4.5.1 Background

EPL 10935

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.

U1 Sediment Investigation Report

U1.1 The licensee must engage a suitably qualified person to prepare an investigative report on mitigation measures to reduce the potential of sediment being tracked onto the public roads by vehicles exiting the premises, which includes:

a) A review of the effectiveness of existing controls and measures to reduce the potential of sediment tracking as a result of vehicles leaving the premises;

b) A detailed plan on how the licensee will ensure that no material, including sediment or oil, is tracked from the premises; and

c) Recommendations for measures to control sediment tracking, including options for interim and long-term measures.

EPL 10935 Condition U1 was introduced following an EPA licence variation in October 2023 in response to observed sediment tracking from the premises. A Sediment Tracking Assessment and Recommendations Report was prepared by Wolf Peak and submitted to the EPA in March 2024. The report reviewed existing sediment controls and recommended a range of operational and infrastructure improvements, including enhanced cleaning and maintenance practices, stormwater control measures and installation of a wheel wash system. The recommendations have subsequently been implemented on site.

Under EPL 10935, routine water quality monitoring is not required. Groundwater and/or surface water monitoring may be undertaken where requested by the EPA in accordance with Condition E2.2.

Table 4-10: Stormwater Monitoring

Requirement	Monitoring location
Stormwater discharge limits	Not specified under EPL10935
Monitoring Locations	Not specified under EPL10935

4.5.2 Associated Monitoring Requirements

EPL 10935 does not specify routine stormwater quality monitoring, discharge limits or designated monitoring locations for the premises.

Monitoring may be undertaken where required by:

- incident response and investigation activities;
- complaints investigation;
- environmental assessments;
- specific requests or directions issued by the NSW EPA; or
- requirements under the Pollution Incident Response Management Plan (PIRMP).

In accordance with EPL 10935 Condition E2.2, the EPA may require monitoring of groundwater beneath the premises and/or surface water leaving the premises following an incident or event where pollution has occurred or is suspected to occur.

4.5.3 Water Use and Discharge

Water is used on-site mostly for the following applications including:

- Dust control
- Consumption for staff amenities and for cleaning.

Water is discharged from the Site for the following purposes:

- Wastewater from staff amenities is drained to sewer
- Stormwater runoff swales to the on-site stormwater management system
- Stormwater drains to sediment basin.

4.5.4 Portable Toilets

All sewerage is contained in a portable toilet system.

4.6 Stormwater System

4.6.1 Objectives

- To avoid environmental harm within the Site and to waterways and groundwater.

4.6.2 Potential Impacts

Operation of the ARC could lead to impacts of the stormwater system via:

- Discharge of polluted waters to stormwater.

4.6.3 Risk Management and Control

Sediment laden runoff is screened several times. Waste materials are tipped, processed and stored inside the shed to prevent leachate generation. The waste material stored inside the shed is protected from rainwater by the building. Waste stored in bins is prevented from contaminating stormwater as the bins are maintained in good condition, sealed to prevent leakage and are either stored inside the shed or covered where required to protect the contents if stored outside for transport from site.

Vehicles from time-to-time transfer materials on tyres, which tracks onto internal roads and hardstand areas when moving between the main shed and areas outside the shed. The material is mostly soil transferred to external paved areas. The site sweeper cleans up sediment and keeps the hardstand areas clear of tracked material, which is prevented from leaving the premises by a rumble grid. Further, screens installed in drainage pits trap the majority of tracked sediment, which is removed from the pits and screens through regular cleaning by site staff.

The concrete hardstand has been constructed to capture runoff and direct it into the onsite treatment system. Retention of stormwater in a stormwater first flush/pre-treatment device, which is capable of settling out solids and other substances in suspension, however, it is not to be solely replied upon to prevent pollution. The materials retained in the system are the main pollutants that may arise from activities in the yard.

To reduce maintenance requirements of the treatment system prevention measures are in place to minimise sediment pick-up by stormwater are as follows:

- All drainage pits are fitted with gross pollutant inlet screens with a maximum diameter of 2-3mm to retain coarse sediments and gross pollutants
- All drainage pits are fitted with Enviropods or similar with sediment and oil filters to screen out sediment and other materials in suspension in site runoff
- On a daily basis and after each significant rainfall event, the inlet screens are to be inspected and retained sediment and other debris removed as appropriate
- Any unpaved catchment areas are either landscaped or dressed with coarse aggregate/mulch or similar to promote water infiltration into the ground
- Undercover storage areas are protected from stormwater and maintained in as dry condition as possible (i.e. ponding of water should not occur) at all times
- Roof drainage is to the above ground stormwater detention tanks and the above ground stormwater retention tanks
- No undercover storage areas drain to the stormwater system
- Waste storage bays are within the bunded building, which is protected from stormwater entry and leachate discharge by surface grading that acts as a trafficable bund at the entrance
- All stormwater pits are 600 x 600mm
- Humps/diversion mounds have been constructed at all entrances to the main building. Refer to site plans for detail
- Trafficable pits have been fitted and are in accordance with AS 5100.5, and
- Access covers and grates have been fitted that are in accordance with AS 3996.

The Site Supervisor has the responsibility to check the stormwater management system and controls to ensure they are operational and that sediment has not accumulated throughout.

Regular maintenance of the system is conducted as per the manufacturer's recommendations where relevant. The Site Supervisor completes periodic assessment of the performance of the controls in accordance with the SEQ Management Plans and Procedures.

Table 4-11 below details the stormwater quality risks associated with operation of the ARC and subsequent control measures.

Table 4-11: Water Quality Risk Management Strategies and Controls

Risk	Potential Source	Cause	Controls
Stormwater Impact	Contaminated stormwater discharging to stormwater	Untreated stormwater	• Stormwater treatment devices deployed at key risk areas. • Stormwater treatment devices and areas are deployed, cleaned, maintained, repaired or replaced.

4.6.4 Monitoring

Table 4-12: Water Quality Monitoring

	Mitigation Measures and Safeguards	Timing	Responsibility
1	Stormwater treatment devices monitored for correct deployment, cleaning, maintenance, repair or replacement.	Daily/Ongoing	Site Supervisor/ Site Manager
2	Internal and external road sweeping services are employed.	Daily/Ongoing	Site Supervisor/ Site Manager

4.6.5 Measurable Targets

Table 4-13: Water Quality Targets

Targets	Measurement
No complaints regarding stormwater quality	Incident Management System

The stormwater management plan for the Site is shown in Figure 4-1.

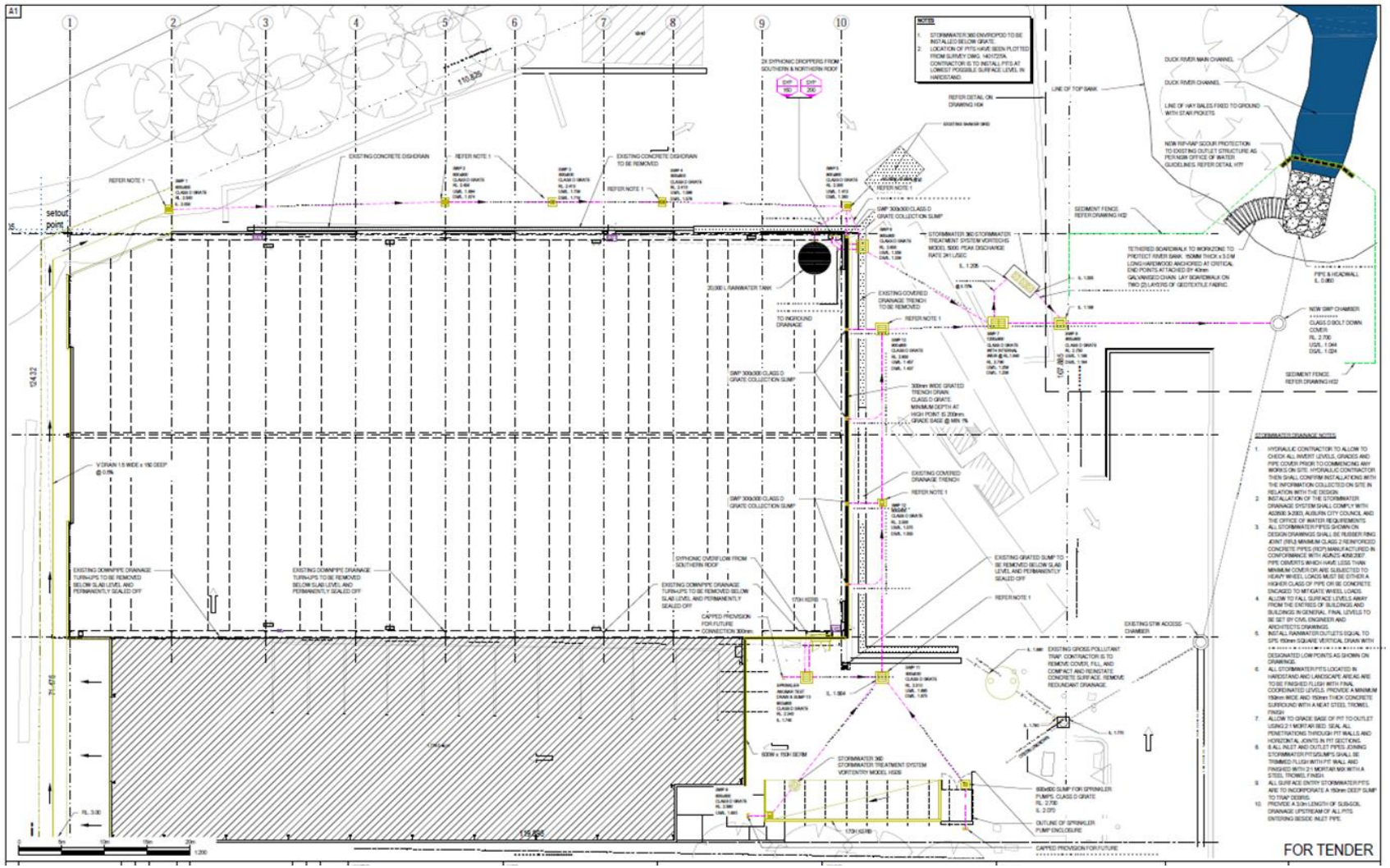


Figure 4-1: Auburn Stormwater Management Plan

4.7 Sediment Tracking

No material, including sediment, hydrocarbons, litter or debris, should be transferred off site via a wheel of any vehicle or falling from any vehicle as they leave the site or utilise the road network. There should be no sediment tracking onto adjoining public roads.

Table 4-14: Tracking Controls

Risk	Potential Source	Cause	Controls
Sediment Hydrocarbons Litter Debris on roads	Transport in and out of site	Wind blown	**Primary** • Rumble strips • Rumble grids • FOD mats • Sealed vehicle movement areas • Passively ventilated sheds • Geofabric mats (coir mats). **Secondary** • Misting sprays within or at the exit of the sheds • Wheel bath/spray (no treatment) • Site sweeper • Sprinklers to external entrances to the sheds (AQ10) • Housekeeping schedule • Fog cannon. **Tertiary** • Street sweeper (Contractor) • Wheel-wash with circulating wash water • Accumulated dust is removed quarterly.

4.7.1 Monitoring

Table 4-15: Tracking Monitoring

	Mitigation Measures and Safeguards	Timing	Responsibility
1	**No evidence of tracking** Road does not show any discolouration or material on road from tracking. No lifting of dust off the road. No clumps of soil, oil or litter visible. Inspect, monitor and review throughout the day.	Daily/Ongoing	Site Supervisor/ Site Manager
2	**Tracking is light** Evidence of tracking extending to 20m of the site entrance/exit. Little discoloration of road pavement. Minor	Daily/Ongoing	All site staff

	Mitigation Measures and Safeguards	Timing	Responsibility
	lifting of dust off the road at the site entrance/exit. No presence of clumped soil. End of day - reset of the standard for entrance/exit ways to have no tracking present.		
3	**Tracking is increasing** Evidence of tracking extending to 50m from the site entrance/exit. Road discoloration is evident, but original road surface is still visible. Dust lifting from the road up to 20m from the site entrance/exit. Clumps of soil present on the site driveway. Identify and address sources/high risk areas of site. Increase on-site sweeping. Implement/replace/increase on-site housekeeping activities, such as removing sediment from FODs, replace geofabric mat (if present). Monitor and review regularly while operating.	Daily/Ongoing	Site Supervisor/ Site Manager
4	**Tracking is heavy** Evidence of tracking extending to beyond 50m from the site entrance/exit. Road discolouration is evident. Road is obscured by mud/dust. Dust lifting from the road up to 50m from the site entrance/exit. Clumps of soil present on the driveway and road. Temporarily close, restrict or change access, stop or reduce operations to allow the site to focus and reset to achieve reduction of risk and achieve the standard.	Close site	All site staff

4.7.2 Measurable Targets

Table 4-16: Tracking Targets

Target	Measurement
No tracking beyond the Site gate	Visual Inspection

4.8 Dangerous Goods and Hazardous Materials Management

4.8.1 Background

Small volumes of substances classified as dangerous goods or hazardous materials (DGHM) are temporarily stored on-site. These goods and chemicals are used mainly for site and equipment servicing and refuelling. On occasion, DGHM are also inadvertently brought into the Site in the form of NCW. All NCW is separated out prior to wastes being processed as discussed in Sections 4.2.6 and 4.2.7.

Other than NCW, the key substances kept on-site include:

- Diesel – for refuelling
- Hydraulic oils – for maintenance.

Diesel is used to refuel mobile and fixed plant. Diesel is used for the Site forklift. The maximum volumes of diesel stored on-site is 28,000 litres.

Controls are in place for the storage and handling of these materials. The controls are established with the EMS and Procedures.

The location of substances within the Site and the management strategies for pollution incidents that may occur involving these materials are addressed within the EPIRMP.

4.8.2 Applicable Legislation, Guidelines or Procedure

Refer to Appendix C - EPIRMP.

Dangerous Goods on-site are also managed in accordance with the segregation principles outlined in Figure 4-2 below.

4.8.3 Objectives

To avoid environmental harm through inappropriate storage and handling of Dangerous Goods and Hazardous Materials (DGHM.)

4.8.4 Potential Impacts

Operation of the ARC could lead to impacts to human health and/or the stormwater and sewerage system via:

- Unintended release
- Unexpected find of NCW.

4.8.5 Risk Management and Control

The Work Health and Safety Regulations set specific requirements for labelling of chemicals and content of Safety Data Sheets (SDS) and requirements to comply with the Globally Harmonised System of classification and labelling of chemicals (GHS).

The GHS replaces the Approved Criteria for Classifying Hazardous Substances [NOHSC: 1008(2004)] for workplaces. The changes include using a common set of pictograms, signal words, hazard statements and precautionary statements for labels and SDS. The GHS covers physical, health and environmental hazards.

Management of waste materials and items that have contained DGHM must be in accordance with GHS requirements i.e. they must be handled, transported, stored and labelled accordingly.

Refer to EMS procedures and forms in relation to handling storage and transport of these items and products.

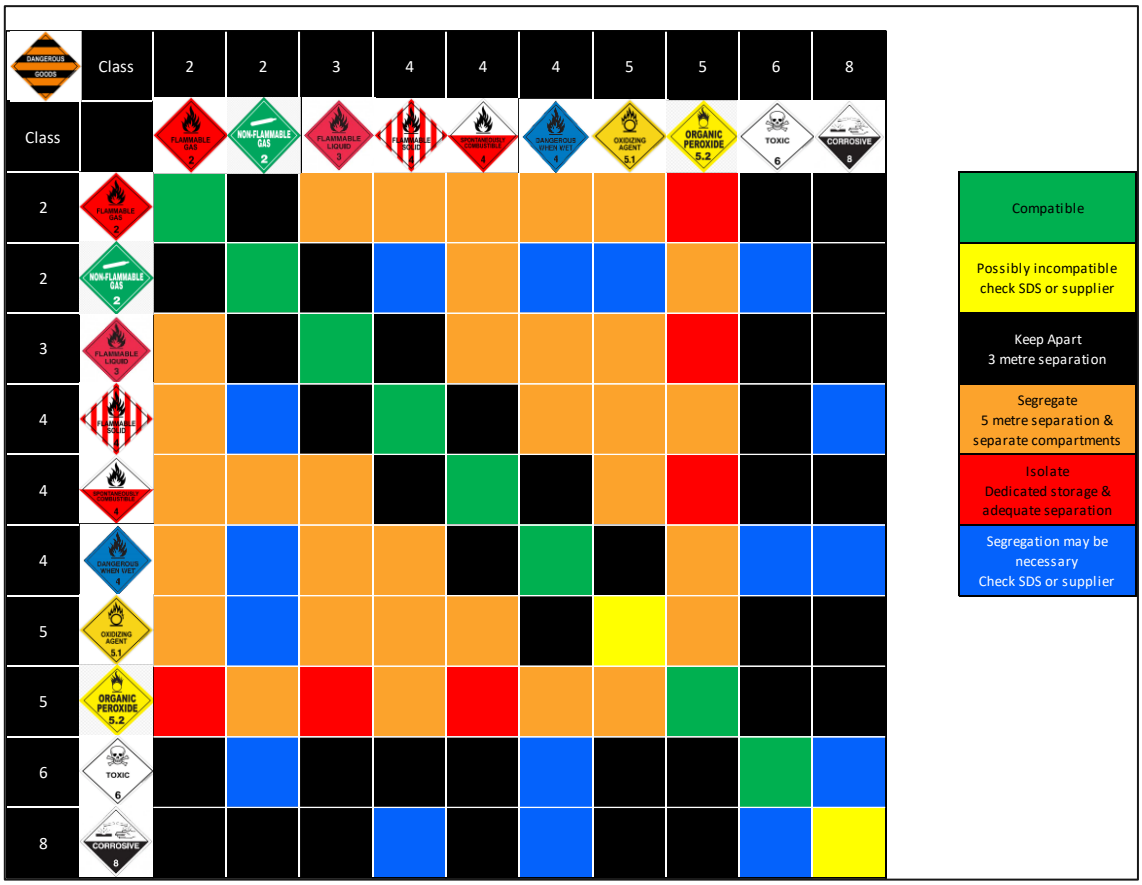


Figure 4-2: Dangerous Goods Segregation Chart

4.8.6 Monitoring

Table 4-17: DGHM Monitoring

	Mitigation Measures and Safeguards	Timing	Responsibility
1	Containment and storage of DGHM is maintained.	Daily/Ongoing	Site Supervisor/ Site Manager
2	DGHM are screened from waste receipts.	Daily/Ongoing	Site Supervisor/ Site Manager
3	NCW storage does not exceed recommended guidelines and is transported off-site when required.	Daily/Ongoing	Site Supervisor/ Site Manager
4	NCW transported off-site and tracked via waste tracker.	Daily/Ongoing	Site Supervisor/ Site Manager

4.8.7 Measurable Targets

Table 4-18: DGHM Targets

Targets	Measurement
No unintended release of DGHM	Incident Management System

4.9 Noise Management

4.9.1 Background

The Site is located within the Cumberland City Council local government area.

Refer to Appendix A – Site Map.

The Site is surrounded by small industrial parks and is in a non-residential area.

Table 4-19: Noise Requirements

ID	Measure	Timing	Document Reference
1	Environmental authority EPL N1 Other than as permitted within this environmental authority, noise generated by the activity must not cause environmental nuisance to any sensitive place or commercial place.	Ongoing	EPL 10935
2	N2 Noise from the activity must not include substantial low frequency noise components and must not cause environmental nuisance to any sensitive place or commercial place.	Ongoing	EPL 10935

4.9.2 Assessments

The predicted operational noise impacts for the ARC during the extended hours have been modelled on Conditions conducted assessment. It is expected that the ARC can operate without adverse impact on identified, existing or proposed dwellings.

4.9.3 Risk Management and Control

Management measures, based on best practice and compliance with the permit conditions, are listed below in Table 4-20.

Table 4-20: Noise Risk Management Strategies and Controls

Potential Source	Management Measure
Equipment and Machinery operation	Permanent heavy equipment to be used on-site will be selected, where feasible and reasonable, with effective mufflers and engine enclosures.
	All equipment used on-site will be regularly maintained to ensure they are in good working condition (e.g. engine does not make the extensive noise).
Loading/unloading waste	All unloading and processing activities will take place wholly within the recycling building.
	Loading of materials is only permitted to be undertaken outside of the recycling building between 7am and 7pm, otherwise loading of materials will be conducted within the recycling building.
Vehicle movements	Vehicle activity is limited to a speed of less than 10 km/h whilst on-site (speed limit is due to safety reasons).
	During the night, where practical, rollers shall be kept closed when vehicles are not accessing/egressing the Facility.

Potential Source	Management Measure
	Broad band reversing sirens (squawkers) shall be used for all site vehicles in place of typical reversing sirens for all associated vehicles operating at the Site for extended periods.

4.9.4 Monitoring

Noise emissions from the premises must comply with the noise limits in EPL 10935 condition L3.1, reproduced in Section 3.4.1.

Table 4-21: Noise Monitoring

Receiver Location	**Assessment Period**	**Noise Criterion**
Residential premises in Stubbs Street and Deakin Street, Auburn	7:00 am - 10:00 pm	LA10(15 min) ≤ 40 dB(A)
Residential premises in Newton Street and Beaconsfield Street, Auburn	7:00 am - 10:00 pm	LA10(15 min) ≤ 45 dB(A)
Industrial boundary	7:00 am - 10:00 pm	LA10(15 min) ≤ 70 dB(A)

Table 4-22: Mitigation Measures and Safeguards

	Mitigation Measures and Safeguards	Timing	Responsibility
1	Permanent heavy equipment to be used on-site will be selected, where feasible and reasonable, with effective mufflers and engine enclosures.	During procurement of site equipment and before commencement of operations	Site Supervisor/ Site Manager
2	All equipment used on-site will be regularly maintained to ensure they are in good working condition (e.g. engine does not make the extensive noise).	Ongoing during site operation	Site Supervisor/ Site Manager
3	All unloading and processing activities will take place wholly on-site.	Ongoing during site operation	Site Supervisor/ Site Manager
4	Loading of materials is only permitted to be undertaken outside of the recycling building between 7am and 6pm, otherwise loading of materials will be conducted within the recycling building.	Ongoing during site operation	Site Supervisor/ Site Manager
5	Vehicle activity is limited to a speed of less than 10 km/h whilst on-site (speed limit is due to safety reasons).	Ongoing during site operation	Site Supervisor/ Site Manager

4.9.5 Operational Noise Monitoring

Relevant adjustments to operational activities will be reviewed in response to complaints.

4.9.6 Measurable Targets

Noise criteria applicable to the Site are provided in Section 3.4.1.

Table 4-23: Noise Targets

Target	Measurement
Nil Complaints	Incident Management System
No complaints regarding noise	Incident Management System

5 MONITORING

5.1 Monitoring and Inspections

Regular monitoring will be undertaken to monitor the performance of the environmental aspects outlined in Section 4. Monitoring will be through a series of formal and informal inspections and monitoring of specific environmental aspects at regular intervals.

A summary of all inspection and monitoring requirements for the Facility is provided in Appendix D – Environmental Risk Assessment and Mitigation Measures.

Regular environmental inspections (monitoring) of the Site's operations are undertaken by the ARC Team, Site Supervisor and other relevant staff.

Daily environment inspections are to be undertaken by the Site Supervisor (or delegate) and the inspection results recorded in Fast Fields.

Other routine inspections are also recorded in Fast Fields by the Site Supervisor or their delegate.

Any non-conformances/non-compliances are recorded on the inspection form and the cause investigated by the Site Supervisor or the ARC team. Corrective and/or preventative action will be recommended by the person undertaking the inspection and the effectiveness of the corrective and/or preventative action assessed at the next Site inspection.

The Site Supervisor reports any significant non-conformances arising from site inspections to the ARC Team. These non-conformances, non-compliance and corrective actions will be managed in accordance with the process described in Section 6.6.

5.2 Monitoring Records

The results of any monitoring required by EPL 10935 must be recorded and retained. All records required by the licence must be kept in a legible form for at least four years after the monitoring or event to which they relate, and produced to any authorised officer of the EPA on request (condition M1).

For any sample collected for the purposes of the licence, the date and time of sampling, the EPA point identification number for the point at which the sample was taken and the name of the person who collected the sample must be recorded (condition M1.3). EPL 10935 does not currently nominate any monitoring points or require routine pollution monitoring at the premises.

6 AUDITING, REPORTING AND REVIEW

6.1 Environmental Auditing

Internal audits will be undertaken to assess the effectiveness of environmental controls and compliance with this Plan and other relevant guidelines. The following elements may be included in the audit of the overall EMS:

- Compliance with statutory obligations
- Compliance with standards, guidelines, specifications and contract conditions
- Compliance with the EMS and EPIRMP
- Adequacy of monitoring and operational reports
- Completion of environmental actions
- Adequacy of environmental training records
- Adequacy of environmental records, checklists and document management systems
- Preparation of environmental reports
- Recording and completion of corrective actions following environmental incidents and complaint
- Achievement of environmental performance objectives
- Implementation of actions from previous audits.

Audits will be undertaken by suitably qualified and experienced ARC Team member and in accordance with an audit schedule.

6.2 Reporting

6.2.1 Internal Reporting

Monitoring is undertaken to measure environmental performance against the environmental outcome and whether trigger level actions or threshold contingency actions need to be implemented.

Monitoring of the ARC consists of regular maintenance inspections of operational activities by Site staff and implementation of SEQ compliance audits undertaken in line with the OEMP.

Regular Environmental Inspection Checks are completed and reviewed on a daily basis and an environmental performance report is completed monthly.

Where an audit or inspection generates an action, these will be recorded and uploaded into the Incident Management System where they can be traced until completed. Completed daily and checklists and monthly reports will be recorded and stored electronically on the same system.

The effectiveness of the inspections will be reviewed as part of internal management reviews and where necessary, the level, scope and timing of inspections will be improved through the life of the ARC to achieve the required environmental performance.

6.2.2 External Reporting

Condition R1.1 of EPL 10935 requires details of any non-compliance with the conditions of the licence to be supplied to the EPA via eConnect EPA within 21 days after the licensee becomes aware of the non-compliance. The notification must include:

- the date the licensee became aware of the non-compliance;

- the date(s) the non-compliance occurred, including whether it is continuing;
- whether the non-compliance relates to air, water/land, noise or waste matters (if applicable);
- whether the non-compliance relates to a pollution incident;
- the licence condition(s) not complied with;
- a summary of the particulars of the non-compliance, including (if known) its location and duration and, if continuing, its suspected end date;
- the cause or suspected cause of the non-compliance;
- any action taken, or proposed to be taken, to mitigate the effects of the non-compliance; and
- any action taken, or proposed to be taken, to prevent a recurrence.

The EPA may request further details of a reported non-compliance, which must be provided via eConnect EPA within the time specified in the request (condition R1.2). Condition R1.1 does not apply to a non-compliance identified by the EPA as part of an EPA environmental compliance audit (condition R1.3). These requirements replace the annual Statement of Compliance previously required under the licence.

If monitoring is undertaken as a result of a licence condition, a pollution monitoring data summary must be supplied to the EPA via eConnect EPA, as a Microsoft Excel file in the prescribed format, no later than 60 days after the end of each reporting period (condition R1.5). The reporting period runs from the licence anniversary date of 1 August. EPL 10935 does not currently require routine monitoring, so a data summary is only required if monitoring is required by the EPA.

Notification of pollution incidents and written reports requested by the EPA are described in Section 6.4.

6.2.3 Records and Document Management

Registers of records, documentation and procedures related to environmental management requirements are maintained and stored on the Intelex document management system (IDMS). Procedures provide instructions to staff on when and how registers and forms are to be completed.

All documents are developed and maintained in accordance with the company's SEQ document control system and certified WHS, Environmental Management and Quality (SEQ) Management systems.

Procedures are made available in Bingo's Intelex intranet site and on the document management system.

Records include training records, monitoring data, complaints and environmental incident reports, relevant licences, certifications, non-complying waste reports and any other documents specific to the Site of which some are retained on-site such as the rejected loads register, and the remainder are retained by Bingo support teams at Head Office.

All records must be kept for a period of at least five years and provided to the administering authority upon request.

A copy of EPL 10935 must be kept at the premises, produced to any authorised officer of the EPA on request and made available for inspection by any employee or agent working at the premises (condition G1).

6.3 Review and Continuous Improvement

The ARC OEMP will be reviewed at least annually, to review the adequacy of the environmental and sustainability controls, procedures, objectives and targets within the ARC OEMP. This will enable the Bingo Management team to determine whether the controls are still applicable to the activities being undertaken and to track progress against the objectives and targets.

The review will consider as a minimum:

- Reviewing the results of audits
- Evaluation of the ARC OEMP, which improvements and corrective actions will be sought
- Evaluation of the operation of the ARC OEMP and the EPIRMP.

The review will be documented and changes to the plan made by a member of the SEQ Team.

Continual improvement of the OEMP will be achieved by identifying improvement opportunities through the continual evaluation of environmental management performance against environmental policies, objectives and targets. As incidents, non-conformances and non-compliances occur, the continual improvement process will:

- Determine the root cause or causes
- Develop and implement a plan of corrective and preventative action
- Verify the effectiveness of the corrective and preventative actions.

Outcomes of these reviews shall be documented and retained for the duration of the development.

Review and improvement of this plan will be undertaken in accordance with Bingo SEQ Management System document control procedure. Continuous improvement will be achieved by the ongoing evaluation of environmental management performance and effectiveness of this plan against environmental policies, objectives and targets.

The updated plan and a summary of changes will be available on-site and distributed to all relevant stakeholders in accordance with Bingo SEQ Management System document control procedure.

6.4 Incidents

6.4.1 Environmental Incident Definition

An environmental incident is defined in SOP-SEQ001 Incident Reporting Investigation and Review Procedure and OPL-SEQ011 Environmental Incidents or otherwise as an unexpected event that may result in harm to human health or the environment and requires some action to minimise the impact or restore the environment.

An environmental incident can include (but is not limited to) the following:

- Complaints received from government departments, landowners, interest groups or the general public may be recorded as an incident
- Spill of fuel, oil, chemical or other hazardous materials
- Failure of erosion/sediment control
- Contamination of surface water, ground water or land
- Other emission or discharge
- Fire

- Odour
- Importation of contaminated waste
- Breach of licence, permit condition or legislative requirements.

An event that has the potential to impact on the environment (including a spill into a contained area) is still classified as an environmental incident.

6.4.2 Incident Reporting – Internal

In the first instance all employees and contractors will report all incidents and near misses immediately to their direct manager/supervisor as per the SOP-SEQ001 Incident Reporting Investigation and Review Procedure.

Bingo utilises an Incident Management System to record and manage environmental incidents. All incidents are recorded into this system.

6.4.3 Incident Reporting – External

SOP-SEQ001 Incident Reporting Investigation and Review Procedure defines the threshold and requirements for external reporting but is summarised as:

- Any incident causing actual or potential environmental harm.

Notification must be made by telephoning the EPA Environment Line on 131 555, followed by written details of the notification to the EPA within 7 days of becoming aware of the incident (EPL condition R2).

EPA Environment Line: 131 555.

As per the requirements of EPL 10935 R2 Notification of environmental harm:

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

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.

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.

6.4.4 Emergency Management

Should there be a threat to personnel or the environment, immediate action must be taken to prevent injury or harm to the environment. This may involve the activation of emergency procedures or other actions to control the immediate risk.

Emergency preparedness and response procedures are designed to mitigate the danger or potential danger of certain events. Emergency procedures are implemented in line with the Emergency and Pollution Incident Response Management Plan for the Site as discussed in Appendix C.

Additionally, an Emergency Management Plan has been developed for the Site with emergency response being discussed in the induction. Site based staff will undertake training which covers the roles, responsibilities and access to emergency systems for the Sites on an annual basis via a test of the EPIRMP. The EPIRMP is found in Appendix C.

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, condition E2.2 of EPL 10935 requires the licensee to:

- make all efforts to contain all firewater on the premises;

- make all efforts to control air pollution from the premises;
- make all efforts to contain any discharge, spill or run-off from the premises;
- make all efforts to prevent flood water entering the premises;
- remediate and rehabilitate any exposed areas of soil and/or waste;
- lawfully dispose of all liquid and solid waste stored on the premises that is not already securely disposed of;
- at the request of the EPA, monitor groundwater beneath the premises and surface water leaving the premises; and
- ensure the premises is secure.

6.5 Complaints

Conditions M2 and M3 of EPL 10935 set out the following requirements for 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 3 months after: the date of the issue of this licence.

Trained site staff have the resources to record complaints and other enquiries in accordance with the OEMP and procedures. Complaints are maintained via the Incident Management System and are completed at the time a complaint is lodged. The SEQ Team, following advice from staff, enter complaints into the Incident Management System and follow up and/or conducts further investigations if required. This is located on the Bingo Intelex System.

The person who first receives the complaint records the initial details of a complaint. Records are kept for investigation and reporting purposes.

Signage at the Site provides stakeholders and visitors with an outline of the conditions of entry and a contact telephone number should anyone have any enquiries or complaints.

6.6 Non-Compliance, Non-Conformances and Corrective Actions

6.6.1 Non-Conformance

Non-conformances are observations or actions that do not comply with the EMS and the EPIRMP but are not considered to be a non-compliance with the relevant Development Approval. Where a non-conformance is also considered to represent a non-compliance, it will be recorded as an incident in the Incident Management System.

It is the responsibility of all personnel to report non-conformances to the Site Supervisor and/or ARC Team, who will investigate non-conformances, log corrective actions, and delegate responsibility for corrective actions within assigned timeframes.

All non-conformances will be recorded in a computer-based recording and reporting system. Non-conformances, corrective actions, responsibilities, planned and actual completions dates and details of reporting to Regulatory Agencies and the community where appropriate will be tracked by this system.

Investigation of non-conformance will be undertaken to determine:

- Where applicable, immediate actions to fix the problem in the short-term
- Investigate the root cause of the problem. For example, management system, human factors/behaviour, working environment and training
- Corrective actions to eliminate root cause
- Action(s) undertaken to verify the effectiveness of corrective actions.

6.6.2 Non-Compliance

A non-compliance is an occurrence, set of circumstances or development that results in non-compliance or is non-compliant with the Development Approval and its modifications, but is not considered an incident.

Incident response, classification and notification requirements are outlined in the EMS.

Suspected non-compliance with the Development Approval can be identified by anyone and will be reported to the Site Supervisor and/or Environmental Manager NSW.

Non-compliance with the Development Approval will be recorded and addressed by logging the issue in a computer-based incident recording and reporting system. Non-compliances, corrective actions, responsibilities, planned and actual completions dates and details of reporting to Regulatory Agencies and the community where appropriate will be tracked by this system.

Investigation of non-compliance will be undertaken to determine:

- Where applicable, immediate actions to fix the problem in the short-term
- Investigate the root cause of the problem. For example, management system, human factors/behaviour, working environment or training
- Corrective actions to eliminate root cause
- Action(s) undertaken to verify the effectiveness of corrective actions. Reporting of non-compliances will be undertaken in accordance with Section 6.4.

Non-compliances with the conditions of EPL 10935 must also be reported to the EPA via eConnect EPA within 21 days of becoming aware of the non-compliance, as described in Section 6.2.2.

7 REFERENCES

- Bingo Industries, Environmental Management System and associated SEQ procedures (SOP-SEQ001, SOP-SEQ002, OPL-SEQ011, SOP-YA001, SOP-YA003, SOP-YA016, SOP-YA020 and SOP-OP006).
- Bingo Industries, Auburn Recycling Centre Emergency and Pollution Incident Response Management Plan (May 2025) – Appendix C.
- Cumberland City Council, Development consent DA 542/98 (as modified).
- NSW EPA, Environment Protection Licence 10935.
- NSW EPA (2014), Waste Classification Guidelines Part 1: Classifying Waste.
- NSW EPA, Standards for Managing Construction Waste in NSW.
- NSW EPA, resource recovery orders and exemptions for excavated natural material, recovered aggregate and recovered fines.
- Standards Australia, AS/NZS 5667 Water quality – Sampling.
- Standards Australia, AS/NZS ISO 14001:2015 Environmental management systems – Requirements with guidance for use.

APPENDIX A SITE MAP

Reference: Google Maps

APPENDIX B ENVIRONMENT PROTECTION LICENCE 10935 CONDITIONS

The conditions of EPL 10935 (licence version date 5 June 2026, as varied by notice POEO-1869 issued on 6 June 2026) are reproduced below. The licence should be checked against the EPA public register before each review of this plan.

Condition	Requirement
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 (Act) classification, Licensing Fee Category (Regulation) 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. Resource recovery – Recovery of general waste | 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: ADDERLEY RECYCLING – Auburn, 3-5 DUCK STREET, AUBURN NSW 2144, LOT 300//DP1228073.
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	

Condition	Requirement
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. Wastes (Activity: Resource recovery, Waste storage for each): • Garden waste – Other Limits: Must be removed from the premises within 48 hours of arrival. Cannot be stored on Sundays or public holidays. • Household waste from municipal clean-up that does not contain food waste – Other Limits: Must be removed from the premises within 48 hours of arrival. Cannot be stored on Sundays or public holidays. • Non-chemical waste generated from manufacturing and services (including metal, timber, paper, ceramics, plastics, thermosets and composites) – Other Limits: NA • Office and packaging waste (including paper, plastics, glass, metal, timber) that is not contaminated or mixed with any other type of waste – Other Limits: NA • Asphalt waste (including asphalt resulting from road construction and waterproofing works) – Other Limits: NA • Soils – Other Limits: Arsenic 40 mg/kg; Cadmium 2 mg/kg; Copper 200 mg/kg; Mercury 1.5 mg/kg; Zinc 600 mg/kg; Petroleum Hydrocarbons C6–C9 150 mg/kg; Petroleum Hydrocarbons C10–C36 1,600 mg/kg; Polycyclic aromatic hydrocarbons 80 mg/kg; Polychlorinated biphenyls (individual) 1 mg/kg. No Acid Sulfate Soil or Potential Acid Sulfate Soil is to be received at the premises. Soil thresholds will be subject to review from time to time. • Building and demolition waste – Other Limits: NA • Virgin excavated natural material – Other Limits: NA • Foundry sands – Other Limits: –
L2.2	Foundry sand must be stockpiled within the premises building.
L2.3	Foundry sand must be stockpiled separately to other materials.
L2.4	The authorised amount of waste permitted on the premises cannot exceed 24,000 tonnes at any one time.

Condition	Requirement
L3 Noise limits	
L3.1	Noise emissions from the operation of the premises must: a) not exceed an LA10,T(15 minute) noise emission criteria of 40 dB(A) during the day (7:00am and 10:00pm) when measured within one metre of any residential premises situated in Stubbs and Deakin Street Auburn; and b) not exceed an LA10,T(15 minute) noise emission criteria of 45 dB(A) during the day (7 am and 10:00 pm) when measured within one metre of any residential premises situated in Newton and Beaconsfield Street Auburn; and c) not exceed an LA10,T(15 minute) noise emission criteria of 70 dB(A) during the day (7 am and 10.00 pm) when measured within one metre of any industrial boundary. 5 dB(A) must be added to the measured level if the noise is substantially tonal or impulsive in character.
L4 Hours of operation	
L4.1	Crushing, grinding and separating operations must only take place between the hours of 7 am and 7 pm Monday to Friday and 7 am to 1.30 pm on Saturdays and at no other time on Sundays or public holidays.
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 potentially offensive odour and the odour was emitted in accordance with conditions of licence directed at minimising odour.
L6 Other limit conditions	
L6.1	The height of any stockpile of any material located outside must not exceed four (4) metres.
L6.2	A stockpile height marker showing the height limit of (4) four metres must be permanently installed at the Premises.
3 Operating Conditions – O1 Activities must be carried out in a competent manner	

Condition	Requirement
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 must be carried out in a manner that minimises the generation of dust.
O3.2	The premises must be maintained in a condition which prevents the emission of dust from the premises.
O3.3	The Licensee must ensure that no material, including sediment or oil, is tracked onto the public road from the premises.
O3.4	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.
O3.5	All crushing, grinding and separating works must be carried out inside the buildings located on 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 Processes and management	
O5.1	The licensee must ensure that any general solid waste (non-putrescible) and/or general solid waste (putrescible) for processing, storage or resource recovery at the premises is assessed and classified in accordance with the EPA's Waste Classification Guidelines as in force from time to time.
O5.2	Each type of waste stored on site for recovery/recycling must be stockpiled separately.
O5.3	All unprocessed waste must be stored inside the building. Only processed waste may be stored outside of the building.

Condition	Requirement
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 EPA point identification number for 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.

Condition	Requirement
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 3 months after: the date of the issue of this licence.
M4 Other monitoring and recording conditions	
M4.1	The licensee must keep a record of each load of Soil, as referred to under Condition L2.1, that is received at the premises. The record must include, but not necessarily be limited to, the following: a) a copy of the waste classification report in accordance with the Waste Classification Guidelines, including the classification and the limits specified in the L2.1 table; b) the quantity (in tonnes) of the Soil received; c) the date and time that the Soil were received; d) the registration number of the vehicle transporting the Soil to the premises; e) the name and contact details of the company or individual delivering the Soil to the premises; f) the source(s) and address from where the Soil were received; The record must be retained at the premises for at least 4 years after the receipt of the load of the soil. The record must be produced to any authorised officer of the EPA upon request.

Condition	Requirement
M4.2	Foundry Sands Records The licensee must keep a record for each load of Foundry Sand, as referred to under Condition L2.1, that is received at the premises. The record must include, but not necessarily be limited to, the following: a) a copy of the certifying statement of compliance in accordance with The foundry sand in recovered aggregate exemption 2008, including the characterisation and the limits specified in Table 2 of the exemption; b) the quantity (in tonnes) of the foundry sand received; c) the date and time that the foundry sand was received; d) the registration number of the vehicle transporting the foundry sand to the premises; e) the source(s) and address from where the foundry sand was received; and f) the name and contact details of the company or individual delivering the foundry sand to the premises. The record must be retained at the premises for at least 3 years after the receipt of the load of the foundry sand. The record must be produced to any authorised officer of the EPA upon request.
5 Reporting Conditions – R1 Compliance, and annual reporting requirements	
R1.1	The licensee must supply the EPA, via the EPA's online digital portal, the following details of any non-compliance with the conditions of the licence within 21 days after the licensee becomes aware of the non-compliance: a. the date the licensee became aware of the non-compliance; b. the date(s) the non-compliance occurred, including if the non-compliance is continuing; c. whether the non-compliance relates to air, water/land, noise or waste matters (if applicable); d. whether the non-compliance relates to a pollution incident; e. the licence condition(s) not complied with; f. a summary of particulars of the non-compliance, including (if known): i. the location where the non-compliance occurred; ii. the duration of the non-compliance; iii. if the non-compliance is continuing, the suspected end date of the non-compliance; g. the cause or suspected cause of the non-compliance; h. any action taken, or proposed to be taken, to mitigate the effects of the non-compliance; and i. any action taken, or proposed to be taken, to prevent a recurrence of the non-compliance.

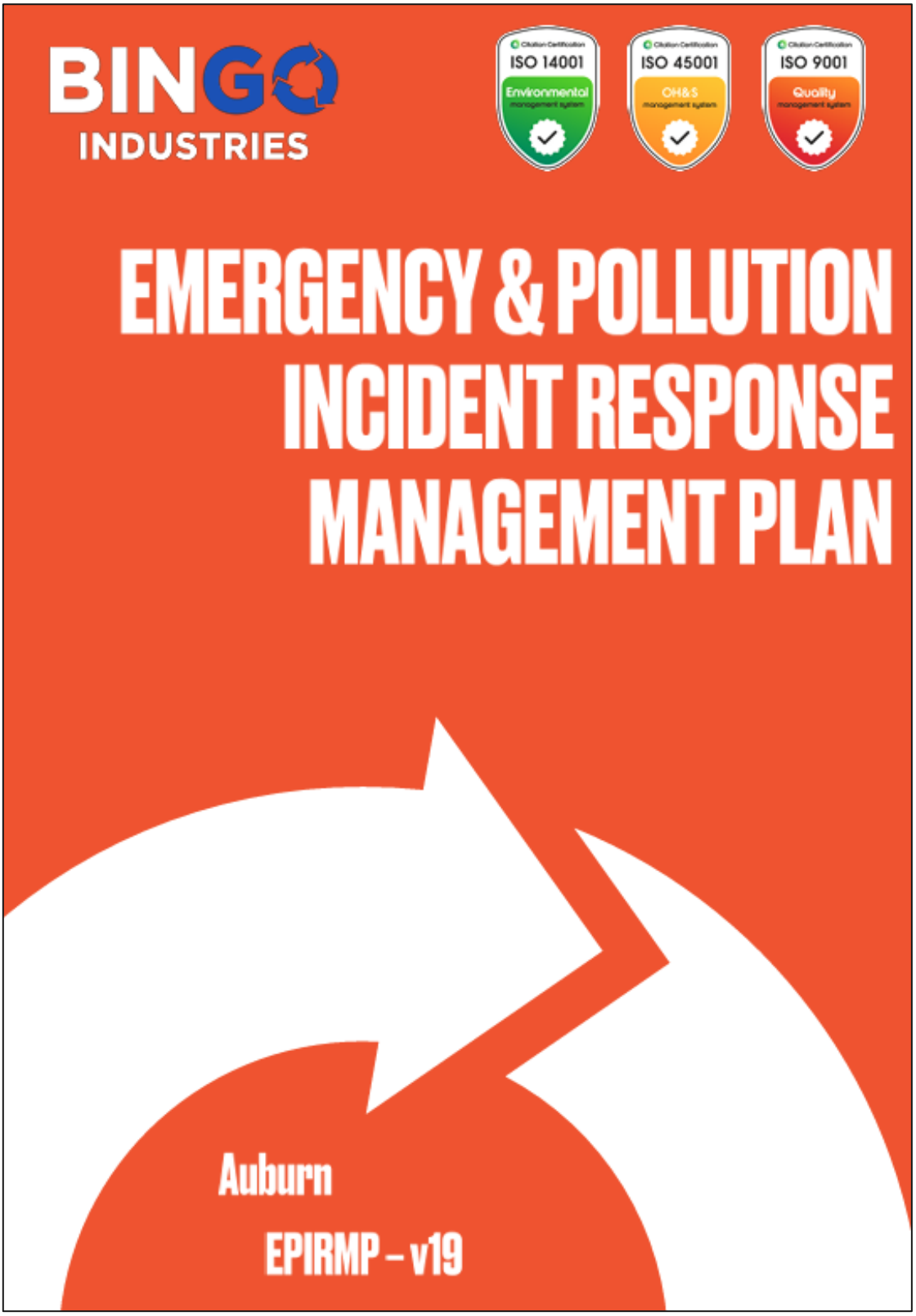
Condition	Requirement
R1.2	The EPA may make a written request for further details in relation to each non-compliance reported in accordance with Condition R1.1. The licensee must provide such further details to the EPA, via the EPA's online digital portal, within the time specified in the request.
R1.3	Condition R1.1 does not apply where a non-compliance with a licence condition has been identified by the EPA as part of an EPA environmental compliance audit.
R1.4	By 05 August 2026, the licensee must supply to the EPA, via the EPA's online digital portal the details required in Condition R1.1 for any non-compliance with the conditions of the licence that occurred: i. after the date the licensee supplied their last Statement of Compliance - Licence Conditions to the EPA, and ii. before the date of the notice of variation of licence that added this condition to this Licence.
R1.5	If the licensee undertakes monitoring as a result of a licence condition, the licensee must supply to the EPA a summary of the results of the pollution monitoring data in respect of each reporting period. The summary must be provided as a Microsoft Excel file, formatted with the following column headings: a. EPA point identification number; b. pollutant; c. unit of measure; d. number of samples required; e. number of samples collected and analysed; f. lowest sample value; g. mean of sample values; and h. highest sample value. The pollution monitoring data summary for the reporting period must be supplied to the EPA via the EPA's online digital portal by the "due date", as defined in the dictionary at the end of this licence.
R2 Notification of environmental harm	
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.
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. 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.
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.

Condition	Requirement
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 Sediment Investigation Report	
U1.1	The licensee must engage a suitably qualified person to prepare an investigative report on mitigation measures to reduce the potential of sediment being tracked onto the public roads by vehicles exiting the premises, which includes: a) A review of the effectiveness of existing controls and measures to reduce the potential of sediment tracking as a result of vehicles leaving the premises; b) A detailed plan on how the licensee will ensure that no material, including sediment or oil, is tracked from the premises; and c) recommendations for measures to control sediment tracking, including options for interim and long-term measures.

Condition	Requirement
U1.2	The licensee must submit to the NSW Environment Protection Authority: a) A copy of the report required by condition U1.1 by 28 February 2024; and b) Confirmation of time frames for the implementation of any recommendations in the report required by condition U1.1 within 6 weeks of completion of the report.
U1.3	Within 3 months from implementing the recommendations in accordance with condition U1.2b) above, the licensee will undertake a review of the effectiveness of the measures and will submit a report to the NSW Environment Protection Authority summarising the outcomes of the review within 6 weeks of completing the review.
8 Special Conditions – E1 Requirement to maintain financial assurance	
E1.1	A financial assurance in the form of an unconditional and irrevocable guarantee from an Australian bank, building society or credit union in favour of the EPA in the amount of two hundred and twenty thousand dollars ($220,000) must be provided to the EPA by 29 July 2011. The financial assurance is required to secure or guarantee funding for works or programs 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.
E1.2	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.
E1.3	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.
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 licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: a) the financial assurance required by condition E1.1, and b) the adjusted financial assurance as required by condition E1.2, E1.3 and E1.4.
E2 Environmental obligations of the licensee	

Condition	Requirement
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 continues 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 premise 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 that is not already securely disposed of; b) Rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.
E3 Claims on financial assurance	
E3.1	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.

APPENDIX C EMERGENCY AND POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



APPENDIX D ENVIRONMENTAL RISK ASSESSMENT AND MITIGATION MEASURES

Risk Assessment Matrix and Rating

		CONSEQUENCE →				
		Insignificant	**Minor**	**Moderate**	**Serious**	**Disaster**
PROBABILITY ↓	**Rare**	1	3	6	10	15
	Unlikely	2	5	9	14	19
	Could Occur	4	8	13	18	22
	Likely	7	12	17	21	24
	Almost Certain	11	16	20	23	25

Risk Rating	**Consequence**
High (18 - 25)	Long term damage, catastrophe and toxic release off-site with detrimental effect and huge financial loss, environmental disaster.
Significant (10 - 17)	Soil, water and air adversely affected in long term, economic and financial loss.
Moderate (6 - 9)	Soil, water and air adversely affected in short term.
Low (1 - 5)	Could affect environment but release contained and managed on-site.

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
1. Surface Water Management								
SW-1	Site Activity	Contaminants in water ways	Water Pollution		All stormwater from all areas of the premises which has the potential to mobilise sediments and other material is to be controlled and diverted through appropriate erosion and sediment control/pollution control measures and sedimentation ponds. Erosion and sediment controls will include management for spills from drainage lines sediment traps, check dams, erosions control, bunds infiltration areas, sediment fences, filters and all other erosion and sediment control devices.	Ongoing		Environment Protection Licence (EPL 10935) under the Protection of Environment Operations Act 1997 (POEO Act)
SW-2	New Earthworks	Sediments into water ways	Water Pollution		Any new earthworks (will be undertaken in accordance with the erosion and sediment control measures outlined in the Managing Urban Stormwater: Soils and construction - Volume 1 “the Blue Book”. Examples include, but are not limited to: Preparing and implementing ESCPs in advance of earthworks and stockpiling. ESCPs and will be updated as required Exposed areas will be progressively rehabilitated or have temporary protection to minimise erosion and sedimentation All ERSED control measures will be maintained and kept in a functioning condition until site disturbance works are completed ERSED protection will remain in place until approval from the Site Environmental Officer. Active work areas will be stabilised at the end of each day’s work and/or just prior to inclement weather.	New Earthworks		Environment Protection Licence (EPL 10935) under the POEO Act

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
SW-3	Site Activity	Sediments into water ways	Water Pollution		All erosion and sediment control structures should be inspected regularly and after any significant rainfall and repaired as necessary.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
SW-4	Site Activity	Sediments into water ways	Water Pollution		**Maintenance of stormwater treatment features.** All stormwater and stormwater treatment devices (including drainage systems, sumps and traps) must be regularly maintained. Sediment ponds, OSD basins and gross pollutant traps must be cleaned and maintained in a manner that ensures they retain an appropriate freeboard, using depth indicators, to minimise the potential for any turbid discharge. This includes removing sediment build up, removal of waste oils/sludge and weed removal which would be disposed of at appropriately licensed facilities. The structural integrity of all features will also be maintained.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
SW-5	Site Activity	Sediments into water ways	Water Pollution		Surface water flows must be diverted away from any area where waste is being landfilled and managed using channels, dams and drains to dissipate the potential erosive effect of stormwater.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
SW-6	Site Activity	Contaminants and Sediments into water ways	Water Pollution		**Materials storage** All refuelling facilities and storage of chemicals, fuels and oils used on-site will be in an appropriately designed above ground, impervious, bunded area that is designed to prevent entry of these chemicals into stormwater. It should be of capacity which can contain 110 percent of the largest container contained within the bund.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
SW-7	Site Activity	Contaminants and Sediments into water ways	Water Pollution		**Spills** Accidental spills will be contained, in the first instance, by bunding and grading to sumps with backup containment created by the main storage basins. Spill kits will be available on-site and staff will be trained in their use to contain spills and prevent them from entering the stormwater drainage system. Runoff from areas where spills can occur will not be discharged off-site without treatment.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
SW-8	Site Activity	Contaminants and Sediments into water ways	Water Pollution		Ongoing surface water monitoring is required at the monitoring point locations and at the frequency specified in the EPLs and summarised in For each monitoring point, the concentration of pollutants measured must not exceed the limits specified in the EPL. If pollutant exceedances are recorded these must be treated as an incident and reported appropriately according to the requirements of the EPLs.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
SW-9	Site Activity	Contaminants and Sediments into water ways	Water Pollution		Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
SW-10	Site Activity	Contaminants and Sediments into water ways	Water Pollution		**Discharge** No water is to be discharged which has not been tested for the pollutants identified in has been found to not exceed the concentration limits or has been treated appropriately. All discharge of wastewater, including treated wastewater will be to sewer.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
2 Waste Management								
WM 1	Site Activity	Contaminated waste accepted at site	Hazardous Waste to Landfill		Only conforming waste materials are to be received and processed.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
WM 2	Site Activity	Contaminated waste accepted at site	Hazardous Waste to Landfill		Non-conforming waste materials are to be screened out of the processing stage, sent back with customers, or stored and then transported out in accordance with applicable procedures.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
WM 3	Site Activity	Stored waste in breach of ERA	Breach of ERA		Waste materials are to be stored in accordance with applicable guidelines.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
WM 4	Site Activity	Stored waste in breach of ERA	Breach of ERA		Stored amounts or receipt of waste materials are not to exceed Environment Protection Licence requirements.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
WM 5	Site Activity	Waste leaving the site in breach of ERA	Breach of ERA		Waste materials are not to leave site in an uncontrolled manner.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
WM 6	Site Activity	Asbestos pollution	Landfill and processing contamination		No asbestos waste will be placed in the conveyor/chute system for conveyance to the base of the landfill.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
WM 7	Site Activity	Waste reduction for reuse	Reduction in waste to landfill		Scavenging of wastes is prohibited at all times other than by the operator in the normal course of diverting, handling and redirecting wastes for recycling, reuse or reprocessing.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
WM 8	Site Activity	Litter	Litter to the environment		Litter will be adequately controlled, and daily housekeeping of the Site will be undertaken. Movable litter control fences are available and will be used in the active tipping area as required where there is a potential for windblown litter around the Site. Waste will be adequately covered to minimise environmental impacts including litter.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
3 Air Quality Management								
AQ1	Material Handling	Generation of dust	Air Pollution		All material handling, processing and storage are within the transfer station.	During operation		Environment Protection Licence (EPL 10935) under the POEO Act
AQ2	Load Inspection	Generation of dust	Air Pollution		All loads to be inspected prior to unloading and water sprays to be used on dusty loads. Misting sprays operated within ARC to dampen material as it is sorted and before being loaded.	Unloading		Environment Protection Licence (EPL 10935) under the POEO Act

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
AQ3	Travel to site	Generation of dust Tracking	Air Pollution		The majority of travel routes on-site are sealed (exceptions are the haul route into the pit and within the segregated materials area).	Transporting to site		Environment Protection Licence (EPL 10935) under the POEO Act
AQ4	Truck movement	Generation of dust Tracking	Air Pollution		The majority of travel routes onsite are sealed to reduce generation of dust.	Vehicle movement on-site		Environment Protection Licence (EPL 10935) under the POEO Act
AQ5	Truck movement	Generation of dust	Air Pollution		Fixed water sprays will be used during operation of the mobile crusher and shredder to dampen stockpiled materials before processing.	Vehicle movement on-site		Environment Protection Licence (EPL 10935) under the POEO Act
AQ6	Truck movement	Generation of dust	Air Pollution		Fixed water sprays on product storage areas.	Waste storage		Environment Protection Licence (EPL 10935) under the POEO Act
AQ7	Truck movement	Generation of dust Tracking	Air Pollution		Water carts operating on unsealed haul road into the pit, within the landfill and on the paved roads as needed and wheel wash is operating at the exit to tipping shed.	Truck Movement		Environment Protection Licence (EPL 10935) under the POEO Act

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
AQ8	Truck movement	Generation of dust	Air Pollution		Speed limit of 25 km·hr-1 for site access road, and 10 km hr-1 for all internal roads.	Vehicle movement on-site		Environment Protection Licence (EPL 10935) under the POEO Act
AQ10	Tipping Loads	Generation of dust	Air Pollution		A dedicated street sweeper will be available on-site at all times to clean paved roadways, hardstand areas and driveways.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
AQ12	High Winds	Generation of dust	Air Pollution		Activities performed on-site will be modified during periods of high winds	High winds during operation		Environment Protection Licence (EPL 10935) under the POEO Act
AQ13	Unloading	Generation of dust	Air Pollution		Minimise drop heights of materials.	Vehicle movement on-site		Environment Protection Licence (EPL 10935) under the POEO Act
AQ20	Use of vehicles	Generation of emissions	Air Pollution		Vehicles will be maintained and operated in accordance with manufacturer's guidance to minimise emissions.	Vehicle use		Environment Protection Licence (EPL 10935) under the POEO Act

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
AQ21	Use of vehicles	Generation of emissions	Air Pollution		All trucks entering the Facility will be required to keep their load covered until such time as they are ready to unload.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
AQ23	Use of vehicles	Creation Mud On roads Generation of dust Tracking	Air Pollution		All vehicles are checked for mud and soil on tyres prior to leaving site and where mud or soil is detected on the entrance road (i.e. “track out”), staff will be deployed to sweep the road.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
AQ24	Site activity	Generation of dust	Air Pollution		Additional dust monitoring will be performed as and when required.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
AQM1	Site activity	Generation of dust	Air Pollution		Prevailing wind conditions and weather forecast information to be reviewed daily by the Site Supervisor from the on-site weather station and Bureau of Meteorology (www.bom.gov.au).	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
AQM2	Site activity	Generation of dust	Air Pollution		Weather warnings and strong winds prediction to be reported to the Site Supervisor. Cease works when conditions are excessively dusty until dust suppression can be adequately carried out in accordance with relevant conditions of the project.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
AQM3	Site activity	Generation of dust	Air Pollution		Ensure that vehicles, plant and equipment are maintained in accordance with their maintenance schedule and daily inspections to identify any vehicle, plant or equipment that is causing visible emissions (should not be longer than 10 sec of continuous visible emissions). Notify Site Manager of any defective emission control.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
AQM4	Use of vehicles	Generation of emissions	Air Pollution		Ensure plant and equipment is operated in a competent way, turn vehicles off when not in use or idling for long periods of time.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
AQM5	Site activity	Generation of dust	Air Pollution Potential Erosion		Existing vegetated areas will be kept undisturbed for as long as possible to minimise the potential for dust generation. Revegetate stockpiles or surfaces that are to be left standing for extended periods.	Site Establishment		Environment Protection Licence (EPL 10935) under the POEO Act
AQM6	Site activity	Generation of dust	Air Pollution Potential Erosion		Apply water to exposed surfaces that are causing dust generation. Surfaces may include unpaved roads, stockpiles; hardstand areas other exposed (for example recently graded areas).	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
4 Noise Management								
NM 1	Site activity	Generation of noise	Noise Pollution		Manage the site within Operational Hours.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act

No.	Activity/Task	Aspects	Environmental Impact	Initial Risk	Control Measures	Timing	Residual Risk	Compliance Requirements
NM 2	Site activity	Generation of noise	Noise Pollution		Other than as permitted within this environmental authority, generated by the activity must not cause environmental nuisance to any sensitive place or commercial place.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
NM 3	Site activity	Generation of noise	Noise Pollution		Noise from the activity must not include substantial low frequency noise components and Condition's standard.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act
NM 4	Site activity	Generation of noise	Noise Pollution		Heavy materials will not be unloaded via tipping on to the ground. All heavy materials will be unloaded via excavator and lowered onto the ground to avoid large vibration events.	Ongoing		Environment Protection Licence (EPL 10935) under the POEO Act