

**OPERATIONS
ENVIRONMENTAL
MANAGEMENT PLAN**

**KEMBLA GRANGE
OEMP-010**

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP-010)

Occupant: Wollongong Recycling (NSW) Pty Ltd
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This document is reviewed at least every two years and as required following audits, risk assessment incidents and changes to operations.

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2 INTRODUCTION

The EPA licensed (EPL 20601) resource recovery facility at 50 Wyllie Rd, Kembla Grange has been successfully operating since 2013. It was originally owned and operated by Wollongong Recycling and Building Supplies Pty Ltd. In 2017, Wollongong Recycling (NSW) Pty Ltd took possession of the facility. The facility was originally approved under Development Consent DA2009/1153 from Wollongong City Council.

On 7 March 2016, approval to expand the capacity of the facility was approved under State Significant Development SSD5300 by the Minister for Planning to receive up to 230,000 tonnes per annum of construction and demolition and commercial and industrial wastes. A further modification to the consent under SSD5300 Mod 1 was approved by the Minister for Planning on 8 June 2017 to relocate the second weighbridge and installation of a larger weighbridge office.

The facility receives building and demolition and other wastes for recycling as value added materials. Materials are delivered by a customer base which includes waste collection services, building and construction, small and medium sized businesses and trades.

The facility aims to achieve an 85% recovery rate from processing incoming materials that include concrete, asphalt, tiles, timber, masonry, clay, soils and garden organics. Mobile plant, including excavators and front-end loaders, are used to remove contaminants and separate incoming building and construction wastes for containment in storage bunkers prior to processing.

As part of the facility's expansion, an integrated Materials Recovery Facility will be built within the existing warehouse building on the site to receive and sort construction and demolition and commercial and industrial materials for recycling.

Stage 1 of the current approved development under SSD5300 involved developing the western part of the facility including the following approved works:

- Construction of soil and waste management measures and new drainage works associated with expansion of the operational area, including installation of batter catch drains;
- Construction of retaining walls;
- Stripping topsoil and bulk earthworks
- Associated with cut and fill activities to expand the operational pad;
- Installation of new weighbridge and weighbridge office;
- Installation of stormwater pits, pipes, leachate tanks, alarm system and Humeceptors;
- Respreading of topsoil;
- Shaping and trimming of stormwater treatment ponds;
- Construction of the greenwaste shredding pavement area;
- Complete landscaping associated with the project;
- Respreading of topsoil
- Complete access roads and sealing with asphalt;
- Construction of additional car parking areas,
- Construct kerbs and table drains;
- Install bollards to gas easement boundary;
- Install biofilters and walls inside composting shed; and
- Install crushed concrete pavement to operational area.

It is noted that following the approval of management plans by the Department of Planning and Environment on 19 August 2016, construction works for Stage 1 commenced on the site in accordance with the approved construction plans, Construction Environment Management Plan and the varied licence for scheduled development activities from the NSW EPA (EPL 20601, licence variation approved 20 September 2016). The construction works for Stage 1 were completed in December 2017.

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Stage 2 of the current approved development process involves developing the eastern part of the facility including the following:

- Construction of a workshop facility;
- Construction of truck parking areas;
- Construction of retaining wall;
- Installation of water tank;
- Construction of a minor surface water sediment retention dam with hydrocarbon Capture; and
- Construction of a new site building and site office/staff OH&S training building.

It is noted that under Condition A2 of SSD5300, the proponent will seek approval of specific management plans for commencement of Stage 2 from the Department of Planning and Environment following completion of Stage 1 construction works.

2.1 The Site

The Site is located at 50 Wyllie Road, Kembla Grange on Lot 10, DP878167. It is located within the Lake Illawarra catchment and covers an area of approximately 21.7 hectares. The operational area that has been cleared and developed is approximately 5 hectares. The Site locations is shown in Figure 1.

The split zoning of the land reflects this variation in land use, with the area of workings zoned as IN2 Light Industrial and the vegetated areas principally zoned RE2 Private Recreation pursuant to Wollongong LEP 2009.

The site is located on the northern side of Wyllie Road and contains cleared areas used for building material storage and recycling material, while the remainder of the site across the northern and eastern section remains vegetated.

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Figure 1: Site Location.



3 PURPOSE AND SCOPE

The purpose of this Operational Environmental Management Plan (OEMP) is to provide the framework of environmental management across the facility in accordance with Condition C3 of Schedule 2 of the State Significant Development (SSD 5300 and SSD5300 Mod 1) Development Consent.

The scope of this OEMP is limited to the approved operational activities of the facility located on Lot 10 DP 878167, 50 Wyllie Road, Kembla Grange.

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4 OBJECTIVES

The objectives of the OEMP are in accordance with Condition C3 of Schedule 2 and Appendix B (Management and Mitigation Measures) of the State Significant Development (SSD 5300 and SSD5300 Mod 1) Development Consent and Statement of Commitments. These are summarised in Table 1 and Table 2 below.

Wollongong Recycling (NSW) Pty Ltd will carry out the Development in accordance with this OEMP as approved by the Department of Planning Secretary (as revised approved by the secretary from time to time), unless otherwise agreed by the Secretary.

Table 1. Objectives and specific SSD5300 consent conditions used to inform the OEMP.

SSD5300 Condition	Description of objective or relevant consent condition	Where this objective been addressed in this OEMP?
C3(a)	The OEMP shall be prepared by suitably qualified and experienced persons	Refer to personnel on pg 2 of OEMP
C3(b)	Provide the strategic framework for environmental management across the Wollongong Recycling (NSW) Pty Ltd facility.	Refer to Section 7, Operational Environmental Management Plan
C3(c)	Identify the statutory approvals that apply to the Development.	Refer to Section 5, Legislative Requirements
C3(d)	Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development.	Refer to Section 6, Environmental Management Roles and Responsibilities
C3(e)	Describe in general how the environmental performance of the Development would be monitored and managed.	Refer to Section 8, Monitoring Auditing and Reviewing
C3(f)(i)	Describe the procedures that would be implemented to: keep the local community and relevant agencies informed about the operation and environmental performance of the Development.	Refer to Section 9, Communications
C3(f)(ii)	Receive, handle, respond to and record complaints.	Refer to Section 10, Complaints and Dispute Resolution
C3(f)(iii)	Resolve any disputes that may arise during the course of the Development.	Refer to Section 10, Complaints and Dispute Resolution; Section 12 Continual Improvement
C3(f)(iv)	Respond to any non-compliance.	Refer to Section 11, Non-Compliance, Corrective Action and Preventative Action
C3(f)(v)	Respond to emergencies.	Refer to Section 13, Emergency Response and Appendix F, Pollution Incident Response Management Plan

Table 2. Statement of Commitments used to inform the OEMP.

SSD5300 Condition	Condition	Where this objective been addressed in this OEMP?
Geotechnical Design Solutions, Works and Investigations		
Appendix B, SOC 4.1	1) Additional site investigations (confirmatory holes and pits) will be undertaken, if required by the supervising geotechnical consultant at critical locations (e.g. on steeply sloping ground) to ensure that the local and regional stability are assessed with respect to the proposed engineering elements and design performances.	<p>Geotechnical designs, works and investigations have been conducted as per the consent SSD5300 and approved Construction Plans.</p> <p>A Final Occupation Certificate was issued to the Applicant by Peter Burgess principal certifying authority (accredited certifier BPB 00052) from Illawarra Building Certifiers on 23 January 2018 verifying satisfactory completion of construction works. The Final Occupation Certificate was issued for the following:</p> <ul style="list-style-type: none"> • Survey • final fire safety certificate • structural certificate • hydrant certification • surrender of consent • controlled activity approval • stormwater and civil certification
	2) As part of site preparation prior to construction works, all vegetation, topsoil and any uncontrolled fill will be removed.	
	3) All footings will be found on same bearing stratum.	
	4) The base of all footing excavations will be inspected by a qualified geotechnical engineer to ensure footing will found in competent materials as designed.	
	5) Should variation in descriptions in soil types, colour or depths be discovered during construction, a geotechnical engineer will be notified so that the potential influence on the footing as it may be affect surrounding engineering elements may be assessed.	
	6) During design consideration will be given to the CSIRO sheet BFT-18 'foundation maintenance and footing performance.	
	7) Temporary surface protection against erosion will be provided in accordance with the requirements of the supervising geotechnical engineer.	
	8) In the long term, the excavation faces will be retained by engineered retaining structure in particularly along the eastern hilly section of the site. These structures will be designed to withstand the applied lateral pressures of the soil/rock layers, the existing surcharges in their zone of influence; including existing structures, and construction related activities, and also hydrostatic pressures (if it is appropriate).	
	9) The final pavement thickness shall be determined from geotechnical testing to establish the subgrade CBR. <ul style="list-style-type: none"> - Pavement shall be designed generally in accordance with Section D2 'pavement design' of the Wollongong Subdivision Code 2008. - Pavement shall be constructed generally in accordance with Section C242.27 'Flexible Pavement' of the Wollongong Subdivision Code 2008. Pavement thickness shall be nominally as follows: <ul style="list-style-type: none"> - Base course 150mm layer of DGB20 compacted to 98% of modified compaction - Sub base course shall be not less than 150mm thickness of DGS40 compacted to 95% modified compaction - Pavement seal shall be either two coat hot bitumen seal (14/7) or 40mm thickness of AC 14. - If CBR values warrant a thicker sub-grade of DGS40 shall be placed in layers of compacted thickness of not less than 100mm and not exceeding 200mm thickness (refer C242.27). 	

SSD5300 Condition	Condition	Where this objective been addressed in this OEMP?
	Groundwater	
Appendix B, SOC 4.2	1) Groundwater presence or levels will be confirmed if construction is undertaken during or following adverse weather or if a significant time period elapses between this investigation and construction. The Office of Water will be notified prior to any works occurring that are likely to intercept or extract groundwater and an estimate of the likely take of groundwater will be provided to the Office of Water to assess the need for an authorisation.	A Groundwater monitoring plan has been actioned by Wollongong Recycling (NSW) Pty Ltd in February 2018 and results are to be provided to Office of Water and NSW EPA. Refer to Appendix C, Soil and Water Management Plan
	2) Quarterly Testing of the groundwater on the site will be undertaken to identify any future trends and characterise the groundwater within the local area. Monitoring will commence at least three months prior to construction commencing and the results of the groundwater monitoring programme will be provided to the Office of Water.	A Groundwater monitoring plan has been actioned by Wollongong Recycling (NSW) Pty Ltd in February 2018 and results are to be provided to Office of Water and NSW EPA. Refer to Appendix C, Soil and Water Management Plan
	3) Development of a Soil and Water Management Plan to minimise the amount of surface runoff and potential migration of contamination.	Refer to Appendix C, Soil and Water Management Plan
	4) Engineering of the development working platform to minimise the infiltration of any contaminants into the underlying soils.	Construction works completed as per SSD5300 and SSD5300 Mod 1 approved construction plans. A Final Occupation Certificate was issued to the Applicant by Peter Burgess principal certifying authority (accredited certifier BPB 00052) from Illawarra Building Certifiers on 23 January 2018 verifying satisfactory completion of construction works.
	Hazards	
Appendix B, SOC 4.3	1) Preparation of an Emergency Management/Response Plan.	Refer to Appendix F, Pollution Incident Response Management Plan
	2) Preparation of an Environmental Management Plan	Refer to this entire Operational Environmental Management Plan
	3) Preparation of a Work Health and Safety Plan.	This is managed under Wollongong Recycling (NSW) Pty Ltd OH&S Management System certified to AS NZS

SSD5300 Condition	Condition	Where this objective been addressed in this OEMP?
		4801: 2001 and is not attached to this OEMP Reference: Bingo Risk Register and Bingo SEQ Management Manual
	4) Preparation of a Hazardous Material Management Plan.	Refer to Appendix F, Pollution Incident Response Management Plan and Section 15, Training
	5) Appropriate induction and training of personnel and the implementation of operator training.	Refer to Section 15, Training
	6) The purchase of spill response equipment and the implementation of spill response training.	Refer to Appendix F, Pollution Incident Response Management Plan and Section 15, Training
	7) Emergency services (police, fire brigade) will be contacted when required	Refer to Section 13 Emergency Response and Appendix F, Pollution Incident Response Management Plan
	8) The implementation of site security to limit public access, as required.	Refer to Section 14, Site Access and Security
	9) Procurement of firefighting equipment adequate for the level of risk and regular maintenance and testing of such equipment	Refer to Appendix I, Bushfire Management Plan. A Final Occupation Certificate was issued to the Applicant by Peter Burgess principal certifying authority (accredited certifier BPB 00052) from Illawarra Building Certifiers on 23 January 2018 verifying installation of firefighting equipment.
	10) Preparation of a Bushfire Management Plan.	Refer to Appendix I, Bushfire Management Plan
	11) Regular maintenance inspections of equipment.	This is managed under Wollongong Recycling (NSW) Pty Ltd Equipment Maintenance Program and is not appended to this OEMP
	12) The preparation of a Traffic Management Plan	Refer to Appendix H, Traffic Management Plan
	13) Implementation of procedures to ensure that handling and storage of flammable and combustible liquids is in accordance with Australian Standard	Refer to Appendix F, Pollution Incident Response Management Plan

SSD5300 Condition	Condition	Where this objective been addressed in this OEMP?
	14) Storage and handling of all substances, including waste, under conditions that minimise the risk of fire, explosion or toxic emissions, with implementation of specific measures that address the use of solvent-extraction reagents.	Refer to Appendix F, Pollution Incident Response Management Plan
	15) Implementation of specific procedures for high risk tasks.	This is managed under Wollongong Recycling (NSW) Pty Ltd OH&S Management System certified to AS NZS 4801: 2001 and is not attached to this OEMP
	16) Appropriate induction and training of personnel in emergency response (internal and external) procedures.	Refer to Appendix F, Pollution Incident Response Management Plan and Section 12, Training
	17) Ongoing communication with agencies such as Rural Fire Services and monitoring of risk levels in relation to fire danger ratings.	Refer to Appendix I, Bushfire Management Plan
	18) Vacuuming and sweeping of site, as required.	Refer to Appendix A, Air Quality Management Plan
	19) Procurement of spill and water cart equipment adequate for the level of risk identified for the project and regularly maintained and tested to ensure good working order.	Refer to Appendix F, Pollution Incident Response Management Plan
	20) If a major failure of air quality management systems occurs, processing will cease at the facility until the management system is repaired and operational.	Refer to Appendix A, Air Quality Management Plan
Biodiversity		
Appendix B, SOC 4.4	1) Retention of remnant intact native vegetation / endangered ecological communities	Pre-construction and construction activities relating to Biodiversity have been carried out in accordance with the Vegetation Management Plan prepared by Southern Habitat (Version 6, dated August 2015).
	2) Erection of a standard three strand wire fence around the extent of the Illawarra Subtropical Rainforest located within the area of workings to indicate and protect this particular remnant. A buffer zone of 5m will apply within this fencing.	
	3) Retention of identified hollow bearing trees	
	4) Retention of a 10m wide vegetated riparian corridor to protect aquatic habitats.	
	5) Retention of identified hollow bearing tree	
	6) Revegetation of disturbed batters and landscape areas with native flora species.	
	7) Undertaking of weed management in accordance with the requirements of the <i>Noxious Weeds Act</i> (1993).	These conditions have been met and approved by the Principal Certifying Authority for the issue of the Final Occupation Certificate.
	8) Removal of vegetative matter from earth moving machinery prior to entering and leaving the site	
	9) Undertaking of weed management of the vegetated riparian buffer area in accordance with the Vegetation Management Plan prepared by Southern Habitat (Version 6, dated August 2015).	
	10) Rapid revegetation and/or stabilisation of disturbed areas.	
	11) Remove windblown rubbish.	Refer to Appendix A, Air Quality Management Plan

SSD5300 Condition	Condition	Where this objective been addressed in this OEMP?
	Vegetation	
Appendix B, SOC 4.5	<p>1) The following will be implemented by Bicorp to protect the Moreton Bay Fig on the site:</p> <ul style="list-style-type: none"> - Retention of a reserve as shown on the Landscape Plan dated August 2015. - Removal of the Hickory Wattles 4 & 5 (simply by cutting out with a chainsaw, not heavy machinery) which will disrupt the Fig's roots. - Removal of the Lantana infestation. - Retention of the small Whalebone Tree east of the Fig, and the young Moreton Bay Fig about 7m south - west of the Fig. - Secure quarantining of the Fig's reserve on the works (i.e. east) side with a steel picket and ribbon fence (known as a Tree Protection Zone/TPZ exclusion fence).- No works (apart from Lantana & Hickory removal) to be undertaken within this zone. 	<p>Pre-construction and construction activities relating to Biodiversity have been carried out in accordance with the Vegetation Management Plan prepared by Southern Habitat (Version 6, dated August 2015).</p> <p>A Final Occupation Certificate was issued to the Applicant by Peter Burgess principal certifying authority (accredited certifier BPB 00052) from Illawarra Building Certifiers on 23 January 2018.</p>
	2) The Restoration Plan of Action, as contained in the Vegetation Management Plan, updated by Southern Habitat in August 2015 will be implemented.	
	<p>3) A two (2) year maintenance programme will commence following completion of primary weed control and revegetation throughout the riparian corridor. Following this maintenance period and final report, the ongoing maintenance shall continue for the operational life of the facility. The maintenance will require the compilation and submission of an annual report to NSW Office of Water and must be prepared by a suitably qualified person/organisation. The annual report must include but is not limited to site conditions including:</p> <ul style="list-style-type: none"> - Weed cover percentage - Native cover percentage - Identification and determination of actions to remedy any issues pertaining to the ongoing maintenance of the riparian vegetation for the 12 months following the report. 	
	Bushfire	
Appendix B, SOC 4.6	1) The stockpiling and loading area for green waste and timber is to be confined to the western and south-western sides of the 'Indoor Processing & Storage Shed' over 100 m from the riparian area or within the Indoor Processing & Storage Shed.	<p>Refer to Appendix I, Bushfire Management Plan.</p> <p>A Final Occupation Certificate was issued to the Applicant by Peter Burgess principal certifying authority (accredited certifier BPB 00052) from Illawarra Building Certifiers on 23 January 2018 on satisfactory completion of works.</p>
	2) The development will be serviced by a static water supply to meet the PBP requirement for a minimum amount of 20,000 litres for firefighting purposes. The water supply will be visible and readily accessible to fire fighting vehicles and a suitable connection for Rural Fire Service purposes will be made available (65 mm Storz fitting). The supply will be accessible to within 3 m by firefighting appliances	
	Acoustic Measures	
Appendix B, SOC 4.7	1) All engine covers will be kept closed while equipment is operating.	This is managed under Wollongong Recycling (NSW) Pty Ltd Equipment
	2) As far as possible, materials dropping heights into or out of trucks will be minimised.	

SSD5300 Condition	Condition	Where this objective been addressed in this OEMP?
	3) Vehicles will be kept properly serviced and fitted with appropriate mufflers. The use of exhaust brakes will be eliminated, where practicable.	Maintenance Program and is not appended to this OEMP
	4) Machines found to produce excessive noise compared to industry best practice will be removed from the site or stood down until repairs or modifications can be made.	
	5) All equipment will be selected to minimise noise emissions. Equipment will be fitted with appropriate silencers and be in good working order. Machines found to produce excessive noise compared to normal industry expectations will be removed from the site or stood down until repairs or modifications can be made.	
	6) The constructor will provide a phone number at the site entrance detailing the site contact so that noise complaints can be received and addressed in a timely manner	Refer to Construction Environment Management Plan (Action 18, Section 2.2) approved by DPE on 19/08/16.
	7) Upon receipt of a noise complaint, monitoring will be undertaken and reported as soon as possible. If exceedances are detected, the situation will be reviewed in order to identify means to attempt to reduce the impact to acceptable levels	SOP-COM003 Incident Reporting Investigation and Review Procedure
	<p>8) All site workers will be sensitised to the potential for noise impacts on local residents and encouraged to take practical and reasonable measures to minimise the impact during the course of their activities. This will include:</p> <ul style="list-style-type: none"> - Avoid the use of loud radios. - Avoid shouting and slamming doors. - Where practical, machines will be operated at low speed or power and switched off when not being used rather than left idling for prolonged periods Keep truck drivers informed of designated vehicle routes, parking locations and delivery hours. - Minimise reversing. - Avoid dropping materials from height and avoid metal to metal contact on material. - All engine covers would be kept closed while equipment is operating. 	OPL-YA027 Controlling Noise Emissions at Recycling Centres
	9) When the expanded facility is operational compliance noise monitoring will be undertaken at that time to determine the noise contribution of all significant site equipment and machinery and the impact on nearby receivers.	Bingo Risk Aspects and Impacts Register
	10) Upon receipt of a valid noise complaint, monitoring would be undertaken and reported as soon as possible. If exceedances were detected, the situation would be reviewed in order to identify means to attempt to reduce the impact to acceptable levels.	SOP-COM003 Incident Reporting Investigation and Review Procedure
	11) Where possible, avoid the use of noisy equipment such as the crusher and screen during the night time period (6am-7am) when the site is operational.	OPL-YA027 Controlling Noise Emissions at Recycling Centres
Environmental and Amenity Impacts		
Appendix B, SOC 4.8	1) Up to three 100,000L rainwater tanks in addition to a permanent pool to provide for dust suppression.	Refer to Appendix C, Soil and Water Management Plan.
	2) Use of recycled crushed concrete in road pavements and hardstand areas to promote infiltration and reduce the volume of surface runoff.	

SSD5300 Condition	Condition	Where this objective been addressed in this OEMP?
	3) Provision of two OSD basins, one on either side of the watercourse.	A Final Occupation Certificate was issued to the Applicant by Peter Burgess principal certifying authority (accredited certifier BPB 00052) from Illawarra Building Certifiers on 23 January 2018 on satisfactory completion of works.
	4) Capture of hydrocarbons, including two Rocla downstream defenders to capture hydrocarbons in oil and grease from runoff. A Humeceptor is also to be installed upstream.	
	5) Implementation of an Operation and Maintenance Plan for WSUD in regard to weekly and monthly inspection and maintenance, as well as after every rainfall event >25mm, in addition to six monthly inspections and maintenance	
Dust and Odour Management		
Appendix B, SOC 4.9	1) Material will be watered prior to it being loaded for haulage, where appropriate.	Refer to Appendix A, Air Quality Management Plan
	2) Watering of truck turn around and reversing areas will be undertaken with at least 2L/m ² /hr as required to control dust emissions. Any other areas that are visible sources of dust will be appropriately watered until dust impact is no longer an issue.	
	3) Chemical Dust suppressant spraying will be undertaken on the unsealed access road from the site office into the site. This will be undertaken as per the supplier's requirements. Additional dust suppression will be applied if dust from the road is visibly observed to be leaving the site boundary	
	4) A dust suppression system will be installed and operated for the crushing plant. The system will be operated as per manufacturers' specification and used whenever dust from the crusher has the potential to be transported offsite in the direction of sensitive receptors.	
	5) The size of storage piles will be minimised where possible.	
	6) Cleared areas of land will be limited and cleared only when necessary to reduce fugitive dust emissions.	
	7) On site traffic will be controlled by designating specific routes for haulage and access and limiting vehicle speeds to below 25 km/hr.	
	8) All trucks hauling material should be covered before exiting the site and should maintain a reasonable amount of vertical space between the top of the load and top of the trailer.	
	9) Material spillage on sealed roads will be cleaned up as soon as practicable.	
	10) A rumble-strip at the interface of the sealed road and the unsealed access road will be provided.	
	11) Excavating operations conducted in areas of low moisture content material will be suspended during high wind speed events or water sprays will be used.	
	12) Excavating operations conducted in areas of low moisture content material will be suspended during high wind speed events or water sprays will be used.	
	13) A site odour management plan be developed prior to commissioning the facility with the increased capacity.	
	14) On site storage times of organic material will be minimised prior to processing.	

SSD5300 Condition	Condition	Where this objective been addressed in this OEMP?
	15) If the chosen composting process allows, the matured compost stockpiles will be covered to reduce the ingress of water and reduce odour. 16) If the leachate pond is a significant source of odour Bicorp will investigate the use of aerators to minimise odour, enhance biological degradation and encourage evaporation. 17) Validation sampling of odour from any key odour discharge points will be undertaken after commissioning 18) Annual odour sampling of the building ventilation stack will be undertaken 19) If required (as demonstrated by annual odour sampling), all air will be treated in an odour control system prior to discharge.	
Energy Efficiency		
Appendix B, SOC 4.10	1) Diesel will be used in the on-site generator during construction and operation to provide all power to the site. 2) Diesel will be used in on site vehicles. 3) Diesel will be used in the transport of construction materials, operation raw materials and waste to the site and to transport site outputs to end- use/disposal location, where such machinery is operated by WRPL. 4) Implement energy metering and monitoring 5) Employ efficient lighting and lighting control technologies (timers and light level sensors) 6) Utilise energy efficient appliances and office equipment.	Bingo Environment Policy Bingo Sustainability Report
Waste Management		
Appendix B, SOC 4.11	1) The proposed development will operate at a maximum capacity of 230,000 tonnes of waste per annum 2) The facility will have a maximum storage capacity of 45,000 tonnes of waste at any one time; 3) The facility will have a processing capacity of up to 871 tonnes per day; 4) The facility will process up to 30,000 tonnes of non-putrescible organics per annum (of which 6,300 tonnes per annum will be composted and 23,700 tonnes per annum will be mulched or sold as firewood); 5) The facility will store no more than 2500m ³ of organic matter on the site at any time (which includes timber, tree stumps etc). Of the 2500m ³ of organics, no more than 500m ³ tonnes of this will comprise compost.	Refer to Appendix D, Waste Monitoring Program
Heritage Conservation		
Appendix B, SOC 4.12	If impacts are proposed outside the current development footprint in conjunction with a future development application in areas of low-moderate Aboriginal archaeological potential, further investigations will be undertaken at that time.	Noted. Development conducted as per approved Construction Plans and construction works approved as per Final Occupation Certificate issued to the

SSD5300 Condition	Condition	Where this objective been addressed in this OEMP?
		Applicant by Peter Burgess principal certifying authority (accredited certifier BPB 00052) from Illawarra Building Certifiers on 23 January 2018.

5 LEGISLATIVE REQUIREMENTS

Wollongong Recycling (NSW) Pty Ltd operates under a number of statutory approvals, licences and permits granted under NSW Legislation. Key statutory requirements are discussed below.

5.1 *Environmental Planning and Assessment Act 1979*

Section 5 Objectives of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and accompanying Regulation provide the framework for environmental planning in NSW and include provisions to ensure that proposals which have the potential to impact the environment are subject to detailed assessment, and to provide opportunity for public involvement.

The proposed development is consistent with the nominated objectives of the Act and is considered capable of fulfilling the statutory requirements. The site investigations have determined that the development will not result in any significant negative impacts that cannot be adequately mitigated or managed. The Environmental Impact Statement confirms that the proposed development can be undertaken in a manner, which will not adversely impact on natural resources but will promote the economic use of the land in a manner which will provide an improved level of resource management within the Illawarra.

5.1.1 State Significant Development

Section 89C (2) of the EP&A Act enables a State Environmental Planning Policy to declare any development, or any class or description of development, to be State significant development. The *State Environmental Planning Policy (State and Regional Development SEPP 2011* has declared this Development to be State Significant Development (under Section 23(1)(3)).

The proposed development, which is defined as a resource recovery facility, is permissible with consent within the IN2 zone of *Wollongong Local Environmental Plan 2009*. In accordance with Condition C3 of Schedule 2 and Management and Mitigation Measures in Appendix B (specifically under SOC 4.3) of the State Significant Development (SSD 5300) Development Consent, the Project requires the preparation and implementation of an OEMS.

5.2 Licences, Leases and Permits

The site operates under Environment Protection Licence (EPL) 20601 as issued by the NSW EPA under the *Protection of the Environment Operations Act 1997* (POEO Act). Two amendments have been made to EPL 20601; one to allow 10,000 tonnes to be stockpiled on the site and one to cover the construction phase of the proposed expansion to the site to process up to 230,000 tonnes per annum of C&D and C&I waste.

SSD 5300 was approved 7 March 2016 by the Minister for Planning which covers the expansion of the facility to process up to 230,000 tonnes per annum of C&D and C&I waste. A further modification to the development consent was approved by the Minister for Planning on 8 June 2017 for changing the location of the second weighbridge and a larger weighbridge office (SSD5300 Mod 1).

It is noted that the development consent previously governing the use of the site (DA-2009/1153) from Wollongong City Council has been surrendered as per Schedule 2, Condition A12 of SSD5300. This was successfully completed on 3 November 2016, prior to commencement of construction works. The site is now governed by SSD5300.

It is further noted that following issue of the Final Occupation Certificate on completion of Stage 1 of the Development, and approval of the OEMS by the Department of Planning and Environment, Wollongong Recycling (NSW) Pty Ltd will seek a variation to the existing Environment Protection Licence 20601 operating on the site to lawfully increase the receipt of incoming waste materials above 30,000 tonnes. This is consistent with Condition A7(a) of SSD5300.

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5.3 Standards for Managing Construction Waste in NSW

The NSW Government implemented substantial reforms to modernise the NSW waste industry with the introduction of the *Protection of the Environment (Waste) Regulation 2014* (Waste Regulation).

The 2014 reforms were designed to achieve the objectives of the *Protection of the Environment Operations Act 1997* (POEO Act), including to protect the environment and reduce risks to human health in New South Wales. The reforms also aimed at providing a level playing field for waste operators, minimise illegal dumping and minimise activities that distorted the market, including excessive stockpiling.

The 2014 reforms led to significant improvements in the operation of most waste facilities and improved ability for the EPA to efficiently regulate waste facilities. Despite this, based on numerous investigations, industry feedback and data analysis, the EPA has become aware of a range of ongoing issues in the construction and demolition (C&D) waste sector.

Therefore, the EPA has proposed that the government make a number of changes to the waste regulatory framework in NSW to meet the objectives of the POEO Act. These proposed changes complement existing waste policy in NSW, including the NSW Government's *Waste Avoidance and Resource Recovery Strategy 2014–21*.

The proposed reforms are set out in the *Standards for Managing Construction Waste in NSW: Public Consultation Draft* (EPA, 2017). It is understood that these standards, while currently in draft, are referenced in draft legislation, and therefore, if enacted, will give them legal force.

To ensure best practice standards are met now and, in the future, Wollongong Recycling (NSW) Pty Ltd have proactively adopted the proposed reforms as per the consultation paper and have adopted the following key reforms in the Asbestos Management Plan (Appendix B) and Waste Monitoring Program (Appendix C):

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

5.4 Other Legislation

Other legislation that may be applicable to the facility operations (but is not necessarily limited to) the following:

- *Contaminated Land Management Act 1997*
- *Crown Lands Act 1989*
- *Dangerous Goods Act 1975*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *Heritage Act 1977*
- *Native Vegetation Act 2003*
- *Noxious Weeds Act 1993*
- *Pesticides Act 1999*
- *Protection of the Environment Operations Act 1997*
- *Protection of the Environment Operations (Waste) Regulation 2014*
- *Protection of the Environment Operations (Clean Air) Regulation 2010*
- *Protection of the Environment Operations (General) Regulation 2009*
- *Road and Rail Transport (Dangerous Goods) Act 1997*
- *Roads Act 1993*

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- *Soil Conservation Act 1938*
- *Threatened Species Conservation Act, 1995*
- *Water Act, 1912*
- *Water Management Act, 2000*

Relevant licences and approvals required under applicable Acts will be maintained as required.

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6 ENVIRONMENTAL MANAGEMENT ROLES AND RESPONSIBILITIES

An overview of key management and operation roles responsible for implement of the OEMP is given in Table 2.

Table 2. Environmental Management Roles and Responsibilities.

Role	Responsibilities	Authority
General Manager	<ul style="list-style-type: none"> • Ensure adequate operational resources are available to assist Environmental representatives to allow the OEMP to be implemented effectively and maintained. • Ensure that the facility is adequately resourced to ensure that the OEMP is implemented effectively and maintained. • Ensure compliance with statutory conditions including: <ul style="list-style-type: none"> ○ compliance with development consent conditions. ○ compliance with any approved management plans, reports, design drawings. • Compliance with EPL 20601. 	<ul style="list-style-type: none"> • Make changes to the plant and stop or suspend operations as required to meet environmental obligations. • Monthly management reviews of OEMP compliance with Operations Manager.
Operations Manager	<ul style="list-style-type: none"> • Responsible for coordination and resourcing of resource recovery facilities across a given region. • Ensure that facilities managed are adequately resourced to ensure that the OEMP is implemented effectively and maintained. • Ensure Environmental Management Strategies, Plans, Programs and associated procedures are implemented in accordance with the requirements of this OEMP and other external requirements. • Provide leadership and support to Site Supervisors to ensure that the OEMP is implemented effectively and maintained. 	<ul style="list-style-type: none"> • Assessment of recommendations by Site Supervisors in respect of plant/operations to ensure approval conditions to be met. • Support Site Supervisors with any additional environmental controls as necessary to meet environmental obligations. • Provide suitable and adequate resources including staff, plant, equipment, consumables, PPE and business systems as requested by Site Supervisors. • Assessment of Site Supervisor performance in coordination of traffic management, hazardous materials management and bushfire response.
Site Supervisor	<ul style="list-style-type: none"> • Ensure that facility resources are appropriately used to ensure that the OEMP is implemented effectively and maintained. • Ensure Environmental Management Strategies, Plans, Programs and associated procedures are implemented in accordance with the requirements of this OEMS and other external requirements. • Provide leadership and support to employees to ensure that the OEMS is implemented effectively and maintained. • Coordination of responses to emergencies and incidents 	<ul style="list-style-type: none"> • Make recommendations in respect of plant/operations as required in order for approval conditions to be met. • Institute any additional environmental controls as necessary to meet environmental obligations. • Provide suitable and adequate resources including staff, plant, equipment, consumables, PPE and business systems. • Responsibility for coordination of traffic management, hazardous materials management and bushfire response. • Actioning of the Pollution Incident Response Management Plan.

Role	Responsibilities	Authority
Environmental Manager	<ul style="list-style-type: none"> Coordinate audits of the OEMS – both internal and external Carry out internal audits of the OEMS compliance. Ensure OEMS is reviewed and amended as required Support site in relation to environmental management requirements, risk management and controls Managing on site response and reporting to the relevant authorities (including emergency response and incidents) 	<ul style="list-style-type: none"> Obtain and maintain all required licence, permits, consents and approvals for the development and its ongoing operations. Coordination of Pollution Incident Response Management Actions. Liaise with Government authorities re: environmental issues on behalf of the operation. Reporting impacts and their management to Government and Management and other stakeholders as appropriate (including emergency response and incidents)
Workshop & Plant Maintenance Manager	<ul style="list-style-type: none"> Undertakes scheduled and unscheduled plant maintenance to ensure effective environmental management through reductions in air emission, noise and vibration. Control on site fuels, chemicals and fluids. 	<ul style="list-style-type: none"> Make recommendations in respect of plant/operations as required in order for approval conditions to be met. Institute any additional environmental controls as necessary to meet environmental obligations
Yard and Plant Operators	<ul style="list-style-type: none"> Report environmental issues to the Operations Manager and/or Environment Manager. Verify waste classification. Inspect waste deposited at site to ensure no unacceptable materials are received. Secure unacceptable or prohibited waste in deposited waste. Assist with clean-up and follow instructions of Operation Manager/Environment Manager in the event of a pollution incident or environmental management issue. 	<ul style="list-style-type: none"> Make recommendations in respect of plant/operations as required in order for approval conditions to be met. To facilitate and implement environmental management strategies in consultation with Operations Manager and/or Environment Manager. Liaise with other operations personnel to implement corrective actions in response to complaints.

7 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

Wollongong Recycling (NSW) Pty Ltd operate and manage their environmental impacts under an ISO 14001 certified environmental management system (EMS) managed by Bingo Industries to encourage rigour and consistency in environmental management across their sites.

The system includes a set of minimum requirements, which are supported by management plans, programs and procedures that apply to operations. These plans, programs and procedures focus on specific aspects of environmental management or potential impact.

The objectives of EMS are to:

- Set and review environmental objectives and targets based on the nature, scale and environmental impacts of activities, products and services.
- Commit to and comply with all environmental legislations and requirements to which the company chooses to follow.
- Ensure continual improvement and prevention of pollution.

Wollongong Recycling (NSW) Pty Ltd is committed to comply with accepted environmental practices, including, where feasible, to meet or exceed relevant legal and other requirements, to strive for continual improvement in its EMS, and to minimise the creation of waste and pollution.

Wollongong Recycling (NSW) Pty Ltd strives for business excellence through its commitment to leading practice in environmental management and performance. Implementation of the Operational

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Environmental Management Plan, under the EMS, assists in minimising the environmental impacts of activities by facilitating continual improvement in environmental performance.

The objectives and targets of the Operational Environmental Management Plan are consistent with the Organisations Environment Policy and have been set taking into consideration legal and other requirements; technical options, financial, operational and business requirements.

The Operational Environmental Management Plan outlines the minimum standard to ensure Wollongong Recycling (NSW) Pty Ltd manages these aspects and impacts in a manner that is planned, controlled, monitored, recorded and audited, using a management system that drives continual improvement.

An overview of the role of the OEMP in supporting the implementation of management systems within the business are given in Figure 2.

Wollongong Recycling (NSW) Pty Ltd's Operational Environmental Management Plan is supported by management plans for key environmental issues that need to be appropriately managed to comply with conditions of consent and relevant legislative standards. These management plans are subject to regular auditing and review and are used to provide site personnel with specific environmental management guidelines relative to the operation they manage.

An overview of the management plans in place in Wollongong Recycling (NSW) Pty Ltd and objectives are given in Table 3.

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Figure 2. Relationship between the OEMP and management systems in place within Wollongong Recycling (NSW) Pty Ltd.

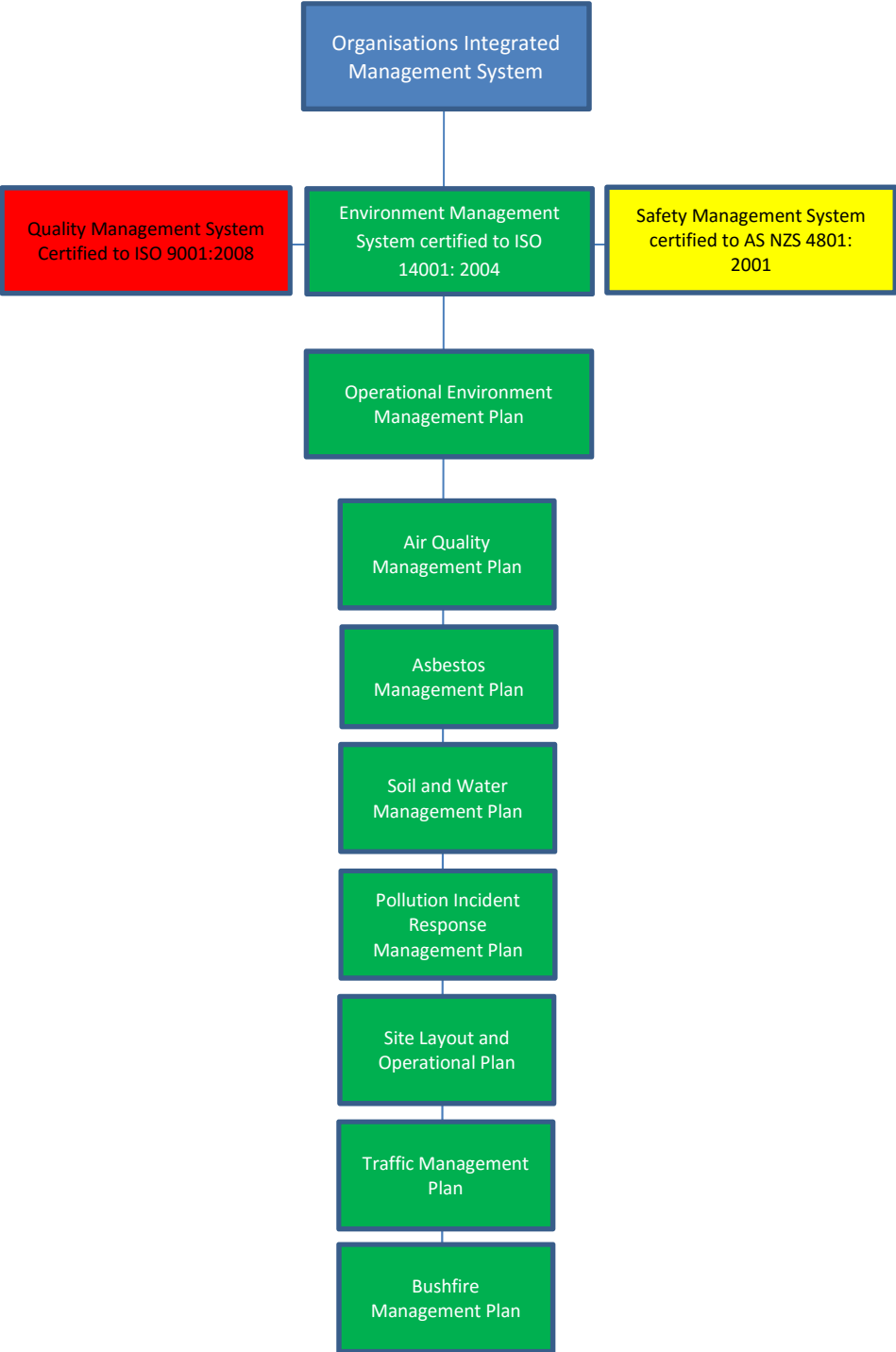


Table 3. Management plans prepared as part of the OEMP, environmental management aspects addressed and objectives of each management plan.

Environmental Management Aspect	Document Reference	Objectives	Implementation	Appendices
Air Quality	Air Quality Management Plan February 2018	The objectives of the Air Quality Management Plan are to: <ul style="list-style-type: none"> • Comply with the requirements of the State Significant Development (SSD 5300 / SSD5300 Mod 1) and Environmental Protection Licence 20601 • Define measures to minimise dust emissions and odour; • Outline the air quality monitoring program; and • Outline the process for investigating air quality complaints and implementing solutions to address complaints. 	Ongoing	Appendix A
Asbestos	Asbestos Management Plan February 2018	The objectives of Asbestos Management Plan are to document the procedures to: <ul style="list-style-type: none"> • Minimise the risk of asbestos being received and processed at the Facility • Minimise the potential risk of asbestos emissions within and from the Facility; • Minimise the risk of exposure to asbestos to employees working at the Facility, customers using the Facility, and the general; • Minimise the potential risk of asbestos contamination in recycled construction and demolition (C&D) materials and products 	Ongoing	Appendix B

Environmental Management Aspect	Document Reference	Objectives	Implementation	Appendices
Soil and Water	Soil and Water Management Plan February 2018	<p>The Soil and Water Management Plan provides procedures and techniques to ensure that the Project mitigation and protection measures achieve soil stability and protect local water quality. The objectives of the Soil and Water Management Plan are to:</p> <ul style="list-style-type: none"> • present overall soil and water management principles and guidelines for the construction phase of the project; • describe how the practical measures and best management practices will be implemented to prevent or mitigate potential downstream impacts relating to soil and water; • outline the roles and responsibilities of those involved in the design and implementation of soil and water management controls; • outline an effective monitoring, auditing and reporting framework to assess the effectiveness of the controls implemented; and • provide an organised, integrated and systematic approach to effectively address and monitor erosion, sedimentation and water quality issues during the term of the project. 	Ongoing	Appendix C
Waste	Waste Monitoring Program February 2018	This Waste Monitoring Program provides guidance on the operational phase of the development associated with management of incoming and outgoing waste material and the requirements associated with management and monitoring of the material from the time that it enters the site through to lawful recycling reuse or disposal of the material.	Ongoing	Appendix D
Environmental Management	Revised Statement of Commitments	The Revised Statement of Commitments outlines all environmental management and monitoring measures, to reduce the adverse impacts of the project	Ongoing	Appendix E

Environmental Management Aspect	Document Reference	Objectives	Implementation	Appendices
Pollution Incident Response	Pollution Incident Response Management Plan February 2018	<p>This pollution incident response management plan (PIRMP) for the WRPL facility is a document set out to fulfil the requirements of Part 5.7A of the POEO Act and contains the details required for pollution incident response management plans as set out within Part 3A of the Protection of the Environment Operations (General) Regulation 2009. The content of this plan includes:</p> <ul style="list-style-type: none"> the procedures to be followed by the licence holder in notifying a pollution incident; a detailed description of the action to be taken immediately after a pollution incident to reduce or control pollution; and the procedures to be followed for coordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and the persons through whom all communications are to be made. 	Ongoing	Appendix F
Site Layout Plans and Drawings	KFW Site Layout Plans	N/A	Ongoing	Appendix G
Traffic Management Plan	Traffic Management Plan February 2018	The Traffic Management Plan ensures the safe movement of vehicular and pedestrian traffic, the protection of workers from passing traffic and to minimise conflict between vehicles accessing properties located within the limits of the Facility	Ongoing	Appendix H
Bushfire Management Plan	Bushfire Management Plan February 2018	The Bushfire Management Plan ensures the safety of workers, visitors, clients and other stakeholders in the event of a bushfire by ensuring the facility minimises the risk of a bushfire occurring and affecting the facility's infrastructure	Ongoing	Appendix I

8 MONITORING, AUDITING AND REVIEWING

8.1 Environmental Performance Monitoring

Environmental performance will be monitored and assessed as per Table 4 below.

Table 4. Summary of environmental monitoring to be performed by Wollongong Recycling (NSW) Pty Ltd.

Aspects	Types of Reports	Frequency	Responsibility
Implementation of mitigation measures	Site inspection/checklist	Daily	Site Supervisor
	Weekly Environmental Inspection	Weekly	Environment Manager (or delegate)
Air Quality	Consultant Report	on a complaint basis	Environment Manager (or delegate)
Noise and vibration	Consultant Report	on a complaint basis	Environment Manager (or delegate)
Groundwater	Consultant Report	Quarterly basis (as or required by Office of Water)	Environment Manager (or delegate)
Surface Water	Surface water monitoring will be undertaken within the OSD, in accordance with M2 of EPL 20601	Immediately prior to the overflow point and every six months	Site Supervisor
Waste	Waste Contribution Monthly Report	Monthly	Operations Manager
	Annual Return	Annually	
This OEMP	Independent Environmental Audit	Within 1 year of the Secretary's approval and every 3 years thereafter	Operations Manager

8.2 Review and Corrective Actions

The primary objective of reviewing the OEMP is to monitor the implementation and effectiveness of the environmental actions identified by the OEMP, and its sub plans, and identify corrective actions where necessary.

The objective of this OEMP is to provide the framework of environmental management across the facility. Consequently, this OEMP is a working document that is designed to ensure any changes that could affect effective environmental management at the site are captured.

The requirements for the document review are:

- The review is to be conducted annually from the date of the first version of the document;
- The document is to be reviewed if there is any significant change in process or operation on the site;
- The document is to be reviewed where there is a change in the legislation or the requirements of the Environmental Protection Licence;

- The document is to be reviewed where the testing of the plan identifies a failure or inefficiency; and
- A review is required to be completed within 30 days of a pollution incident (as per the Pollution Incident Response Management Plan).

Other triggers for a document review include:

- An incident or near miss with actual or the potential for environmental impact;
- An incident or near miss with actual or the potential for environmental non-compliance;
- A non-conformance with the OEMP requirements or other environmental directives;
- Significant failure to implement the mitigation measures outlined in the sub plans; and
- Complaints regarding the operations where corrective actions are required to prevent re-occurrence.

8.3 Independent Environmental Audit

Condition C9, Schedule 2 of the Approval requires an Independent Environmental Audit to be undertaken on the Development, within 1 year of the Secretary's approval and every 3 years thereafter (unless the Secretary directs otherwise). This audit must:

- Be conducted by a suitable qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
- Led by a suitably qualified auditor, and include experts in the fields specified by the Secretary.
- Include consultation with the relevant agencies;
- Assess the environmental performance of the Development and assess whether it is complying with the requirements in the Consent and any other relevant approvals and EPL/s (including any assessment, plan or program required under these approvals);
- Review the adequacy of strategies, plans or programs required under the abovementioned consents; and
- Recommend appropriate measures or actions to improve the environmental performance of the Development, and/or any assessment, plan or program required under the abovementioned Consents.

As per Condition C10 of SSD5300, within six weeks of commissioning of the audit, or as otherwise agreed by the Secretary, Wollongong Recycling (NSW) Pty Ltd will submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

8.4 Annual Review

By the end of March each year (or otherwise agreed with the Secretary), Wollongong Recycling (NSW) Pty Ltd will review the environmental performance of the Development to comply with Condition C11 of SSD5300. The review will:

- Describe the Development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year.
- Include a comprehensive review of the monitoring results and complaints records of the Development over the last calendar year, which includes a comparison of the results against:
 - The relevant statutory requirements, limits or performance measures/criteria;
 - Requirements of any plan or program required under this consent;
 - The monitoring results of previous years; and
 - The relevant predictions in the EIS.
- Identify any non-compliance over the last calendar year, and describe what actions were (or are being) taken to ensure compliance.
- Identify any trends in the monitoring data over the life of the development.

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- Identify any discrepancies between predicted and actual impacts of the Development and analyse the potential causes of any significant discrepancies.
- Describe what measures have or will be implemented in the current calendar year to improve the environmental performance of the Development.

8.5 Revision

In accordance with Condition C12, Schedule 2 of the Approval, strategies, plans and programs required by the Approval and which form the Development OEMP will be reviewed within three months of:

- The submission of an annual review (under Condition C11, Schedule 2).
- The submission of an incident report (under Condition C7, Schedule 2).
- The submission of an audit report (under Condition C9, Schedule 2).
- Any modification to the conditions of the Approval (unless the conditions require otherwise).

Any necessary revisions to the strategies, plans and programs required are to be made to the satisfaction of the Secretary.

This document will be reviewed in conjunction with the above.

8.6 NSW EPA Annual Return

Wollongong Recycling (NSW) Pty Ltd shall complete and return to the NSW EPA, an Annual Return including:

- A Statement of Compliance.
- A Monitoring and Complaints Summary.

An Annual Return is required to be prepared and submitted to the EPA for each Reporting Period, which shall be twelve (12) months after the issuing of the Environmental Protection Licence and each twelve (12) months thereafter, while the Licence remains in effect. All Annual Returns submitted to the EPA must be retained for a minimum of four (4) years after the date they were submitted.

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9 COMMUNICATIONS

9.1 Key Stakeholders

This plan identifies key stakeholders and appropriate communication and consultation processes. Key regional stakeholders include:

- Local and state government agencies and authorities including the NSW EPA (Wollongong Branch) and Wollongong City Council;
- Employees and contractors;
- Local and regional business groups;
- Community groups;
- Residents potentially impacted by operations;
- Local schools and volunteer groups; and
- The broader regional community.

9.2 Sensitive Receptors

The following are considered sensitive receptors to the Facility and therefore must be consulted or informed of major activities on the site, or environmental incidents.

- North of Site:
 - Residential development to the north and north east.
- South of site:
 - Kembla Grange Racecourse
- East of site:
 - Wollongong Lawn Cemetery
- West of site:
 - Wollongong Resource Recovery Park
 - Whytes Gully Waste Depot
 - VISY Recycling
 - Patrick Autocare

9.3 External Communications

The primary source of communication between Wollongong Recycling (NSW) Pty Ltd and the community will be through updates on the website located at:

<https://www.bingoindustries.com.au/>

- Community information will also be provided through other mechanisms, including:
 - Community information sheets and letter box drops.
 - Media releases and other media activities.
 - Direct engagement with community members including affected landholders.
 - Electronic newsletter.
 - Annual Review (Condition 11, Schedule 2).
 - Community events.

9.4 Internal Communications

The site and relevant plant will be equipped with fixed and mobile radio communications equipment to facilitate on site communications. All key staff will have mobile phones, with phone numbers recorded in a central register, to allow for additional means of communications.

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The weighbridge staff will be in regular communication with operational staff. Transport vehicles delivering or removing materials from the site will be required to report to the site weighbridge office on arrival and drivers will be assigned to the relevant VHF channel used on site.

Staff tool box meetings will be held to facilitate required site communications.

Monthly newsletters are sent out to staff to inform and educate staff on relevant industry news or site-specific concerns.

9.5 Access to Information

In accordance with Condition C14, Schedule 2, Wollongong Recycling (NSW) Pty Ltd is required to have the following publicly available on its website and keep this information up to date:

- The documents referred to in Condition A2 of Schedule 2, including:
 - EIS.
 - Response to Submissions.
 - Site layout plans and drawings (Appendix G).
 - Management and mitigation measures (Appendix E).
- All current statutory approvals for the Development.
- All approved strategies, plans and programs required under the conditions of consent.
- A comprehensive summary of the monitoring results of the Development, reporting in accordance with the specifications in any conditions of the consent, or any approved plans and programs.
- A complaint register, updated on a monthly basis.
- The annual reviews of the Development.
- Any independent environmental audit of the Development and Wollongong Recycling (NSW) Pty Ltd' response to the recommendations in any audit.
- Any other matter required by the Secretary.

Wollongong Recycling (NSW) Pty Ltd is responsible for keeping the above information up to date, to the satisfaction of the Secretary. Where privacy of information is requested or required from external parties, the related strategies, plans and/or programs will not be available to the public.

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10 COMPLAINTS AND DISPUTE RESOLUTION

The general procedure to be followed for community complaints, disputes and enquiries is provided below. This System applies to communications directed to staff, contractors and sub-contractors with regards to operations at the Facility.

Community complaints, disputes and general enquiries may be received through a number of routes. The contact details for the public to make general enquiries or lodge complaints about operations at the Facility are:

Office Hours (0700 -1730 Monday to Friday)

- Telephone: 1300 424 646
- Fax: 02 9737 0351
- Postal: PO BOX 7, Enfield NSW 2136
- Email: enquiries@bingoindustries.com.au
- Web: website <https://www.bingoindustries.com.au/contact-us/>

Outside of Office Hours or Emergencies/Incidents

- • Telephone: 1300 032 747

This number is manned 24/7 and personnel are able to be deployed to attend any incident or emergency.

All environmental incidents and emergencies will be forwarded through to the Environment Manager for action. All other operational issues will be forwarded to the Operations Manager.

Early resolution to any complaints/disputes will be sought, a response provided and effort made to resolve the complaint with the complainant in an early verbal response.

All complaints are to be lodged into the Complaints Register. Once a complaint is lodged in the Complaints Register, the relevant personnel (as delegated by the Environment Manager) will provide an initial verbal response to the complainant (immediately if the matter is urgent or otherwise within 24 hour of the complaint) and will investigate or action the complaint if necessary.

Once the complaint or enquiry has been addressed the item will be then be closed. Any actions arising that cannot be managed immediately or within a maximum of 5 working days will become an outstanding action in the register until it is closed off.

The following response times are proposed as a target:

- Phone calls during standard office hours: After initial contact, respond verbally within 24 hours or within 2 hours maximum for emergencies.
- Phone calls outside of standard office hours: Verbal response first thing early in the morning, or within 2 hours maximum for emergencies.
- Written communication; email or letter: Respond in writing within 5 working days. Any complaints requiring a formal investigation will be attempted to be resolved within 5 working days.

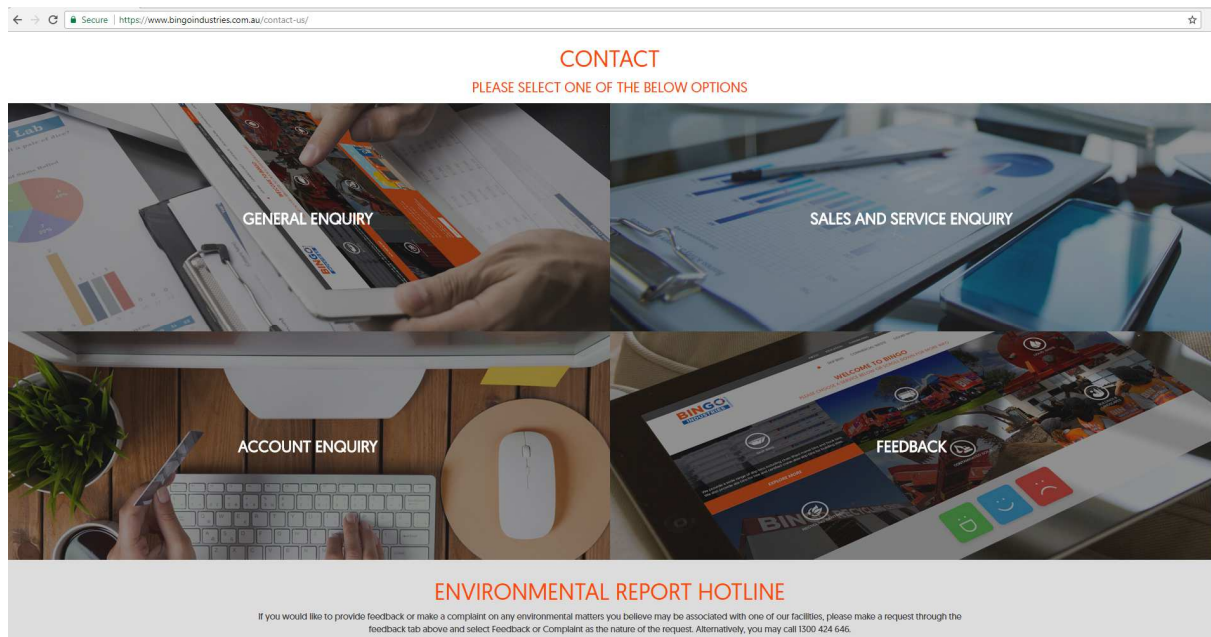
All complaints and enquiries will be recorded in a Complaints Register. The information captured in this register will include:

- Date and time of the contact or complaint;
- Means by which the contact or complaint was made (telephone, mail or email);

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- Any personal details of the individual who provided the information or complaint, or if no details were provided, a note to that effect;
- The nature of the comment or complaint;
- Record of operational and meteorological condition contributing to the comment or complaint;
- Any action(s) taken in relation to the comment or complaint; including any follow-up contact with the individual who provided the information or complaint;
- If no action was taken in relation to the comment or complaint, the reason(s) why no action was taken.

Complaints can be registered on the website, and are registered in the incident management system. The Incident Management System (known as WMS) is maintained on a monthly basis.



A summary of all complaints received during the reporting year is provided as part of the Annual Environmental Management Report.

All complaint's records will be maintained for a minimum four (4) year period after the date the complaint was made.

11 NON-COMPLIANCE, CORRECTIVE ACTION AND PREVENTATIVE ACTION

Procedures, which relate to all operations, detail the process to be utilised with respect to event reporting and identification of non-conformances. Appropriate corrective action(s) to address non-conformances and the establishment of preventative actions to avoid non-conformances are summarised in Table 5 below.

Table 5. Actions to address non-conformance and responsibilities.

Actions to address non-conformance	Responsibility
Identification of non-conformance and/or non-compliances;	All Staff
Recording of non-conformance and/or non-compliance;	Site Supervisor/Operations Manager
Evaluation of the non-conformance and/or non-compliance to determine specific corrective and preventative actions;	Operations Manager/Environment Manager
Corrective and preventative actions to be assigned to responsible person; and	Environment Manager
Management review of corrective actions to ensure the status and effectiveness of the actions	Compliance Team / Senior Management.

In the event that the evaluation of the non-conformance and/or non-compliance and the determination of specific corrective and preventative actions cannot be completed internally, external consultation should take place with the following agencies where relevant:

- NSW Environment Protection Authority;
- Wollongong City Council;
- NSW Fire and Rescue Service;
- Relevant subject expert consultant.

12 CONTINUAL IMPROVEMENT

Continual improvement of the OEMP will be achieved by the continual evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement. The continual improvement process will be coordinated by the Compliance Team:

- As incidents / non-conformances occur:
 - Determine the root cause or causes of non-conformances and deficiencies.
 - Develop and implement a plan of corrective and preventative action to address non-conformances and deficiencies.
 - Review and verify the effectiveness of the corrective and preventative actions at the relevant monthly management meetings.

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

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13 EMERGENCY RESPONSE

Wollongong Recycling (NSW) Pty Ltd maintains an Emergency Management Plan for each of its operations. From an environmental perspective, the key emergency response document for the facility Operations is the EPL 20601 Pollution Incident Response Management Plan (PIRMP) (Appendix F).

The PIRMP has been developed in accordance with the requirements of the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*.

The objectives of the PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities and community members who may be affected by the impacts of the pollution incident;
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks;
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is tested for accuracy, currency and suitability; and
- The PIRMP is tested at least once every 12 months to ensure that the information contained within the plan is accurate and up to date, and that the plan is capable of being implemented in a workable and effective manner.

13.1 Incident Reporting

The secretary, EPA and other relevant agencies will be notified of incidents causing or threatening material harm to the environment immediately (as per the Pollution Incident Response Management Plan). The EPA must be notified by telephoning 131 555 and written details must be provided within 7 days.

13.2 Emergency Contacts and Procedures

Table 6 provides a summary of contacts in the case of an emergency. These contacts will be updated as required.

Table 6. Emergency contacts.

Name	Role	Organisation	Contact
Gavin Visser Site Supervisor	Activating the PIRMP and managing on site response.	Wollongong Recycling (NSW) Pty Ltd	0401 724 355
Luke Miller Operations Manager	Assisting in providing resources to implement the PIRMP and on site response.	Wollongong Recycling (NSW) Pty Ltd	0434 365 031
Ros Dent Environment Manager	Notification of public authorities and neighbours	Wollongong Recycling (NSW) Pty Ltd	0416 685 615
NSW Fire and Rescue, Police and Ambulance	Emergency Response	-	000
NSW EPA Environmental Hotline	Environmental reporting	NSW EPA	131 555 or (02) 9995 5555

Name	Role	Organisation	Contact
Workcover NSW	Incident reporting	WorkCover NSW	13 10 50
Public Health Unit	Surveillance and public health response	NSW Health (from Wollongong Hospital)	(02) 4221 6700 (Business hours) (02) 4222 5000 (After hours)

14 SITE ACCESS AND SECURITY

The facility is surrounded by a 1.8 metre mesh fence with three-strand barbed wire. There is a stock fence above the vegetation line at the northern boundary of the Site, which is inaccessible due to the site's topography and vegetation.

There is a double entry gate to the facility driveway and a weighbridge that controls all entry and exit movements from within the operational area. All vehicles movements within the facility are recorded in the Weighbridge. The main entrance gates are locked at all times when the Site is not attended. Access to the main entry gate keys will be restricted to personal with site opening and closing or emergency access responsibilities.

All ancillary access gates around the perimeter of the Site are locked at all times. Regular inspections of the security fencing and gates are undertaken to ensure that any break-ins, attempted break-ins or vandalism is promptly identified and rectified.

Staff and contractors are not permitted to be on site outside operational hours without management permission and shall only be granted for emergency situations or where urgent works or repairs may be required for plant or equipment.

Any security breaches shall be reported to management or a nominated employee by the security company

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15 TRAINING

All employees, contractors and utility staff working on site will undergo site induction training (which includes environmental due diligence training) and environmental training in relation to environmental management.

The objectives of the training that is to accompany this plan is to ensure all staff members on site are aware of their responsibilities in relation to environmental management during operations. There are three elements that make up how training is undertaken at Wollongong Recycling (NSW) Pty Ltd facility. These are:

- Position competency requirements.
- General induction training.
- Ongoing training.

15.1 Inductions

The general induction is general training that incorporates the WHS requirements for the relevant position. Contractor personnel are required to undertake this WHS training.

The induction training is to be delivered by Wollongong Recycling (NSW) Pty Ltd management. This training will be specific to the individual role of the staff member and will require a detailed review and acceptance of these documented procedures

15.2 Ongoing Training

A review of ongoing training requirements should be conducted on an annual basis and established based on but not limited to:

- Changes in procedures.
- Changes in regulations.
- Changes in equipment.

Records will be kept of all personnel undertaking the site induction and training, including the contents of the training, date and name of trainer/s.

Key staff will undertake more comprehensive training relevant to their position and/or responsibility. This training may be provided as “toolbox” training or specific training tailored by the management.

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APPENDIX A: AIR QUALITY MANAGEMENT PLAN

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APPENDIX B: ASBESTOS MANAGEMENT PLAN

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APPENDIX C: SOIL AND WATER MANAGEMENT PLAN

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APPENDIX D: WASTE MONITORING PROGRAM

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APPENDIX E: REVISED STATEMENT OF COMMITMENTS

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APPENDIX F: POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

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APPENDIX G: SITE LAYOUT PLANS

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APPENDIX H: TRAFFIC MANAGEMENT PLAN

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APPENDIX I: BUSHFIRE MANAGEMENT PLAN

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