

Appendix C

Operational Environmental Management Plan

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St Marys Waste Management Facility



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Prepared for

Worth Recycling Pty Ltd

Prepared by

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Quality Information

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1.0 Introduction

1.1 Purpose of the Operational Environmental Management Plan

This Operational Environmental Management Plan (OEMP) has been prepared by AECOM for the St Marys Waste Management Facility (the Facility) on behalf of Worth Recycling Pty Ltd (Worth).

This OEMP applies only to the environmental management of the operation of the Facility premises at 42-46 Charles Street, St Marys NSW (refer to Figure 1). The Facility is located within the Penrith City Council (PCC) Local Government Area (LGA).

This OEMP has been prepared for implementation at the premises, and provides a system and procedures to address and manage potential environmental impacts associated with the operation of the Facility. Applying mitigation measures in this plan will enable environmental commitments, reporting requirements, safeguards and mitigation measures specified in the development consent for Development Application (DA 12/0780) and other relevant licences, permits and approvals to be adequately implemented, monitored and reviewed.

1.2 Roles and responsibilities

Worth has overall responsibility, authority and accountability for on site environmental performance related to operation of the Facility. This OEMP outlines the key steps to be taken by all site personnel (Worth and its contractors), to manage the environmental hazards and risks associated with the Facility and to effectively minimise the potential for environmental harm.

All Worth and contractor personnel involved in operations relating to the Facility are required to fully comply with the requirements of this OEMP in order to limit the potential for environmental harm and regulatory non-compliance with current legislation.

Implementation of this OEMP will be carried out by the Site Manager. Specific responsibilities in relation to the OEMP are indicated in Table 1.

Table 1 Roles and responsibilities of site staff

Position	Responsibilities
All personnel on Site (including waste contractors / drivers)	To undertake tasks and activities in conformance with the requirements of the OEMP
Site Manager	To ensure that all relevant activities on site are adequately covered by the OEMP and that the OEMP is being implemented and followed in daily operations
Office Manager	Ensure application of the OEMP through personnel inductions and monitor application and effectiveness of OEMP

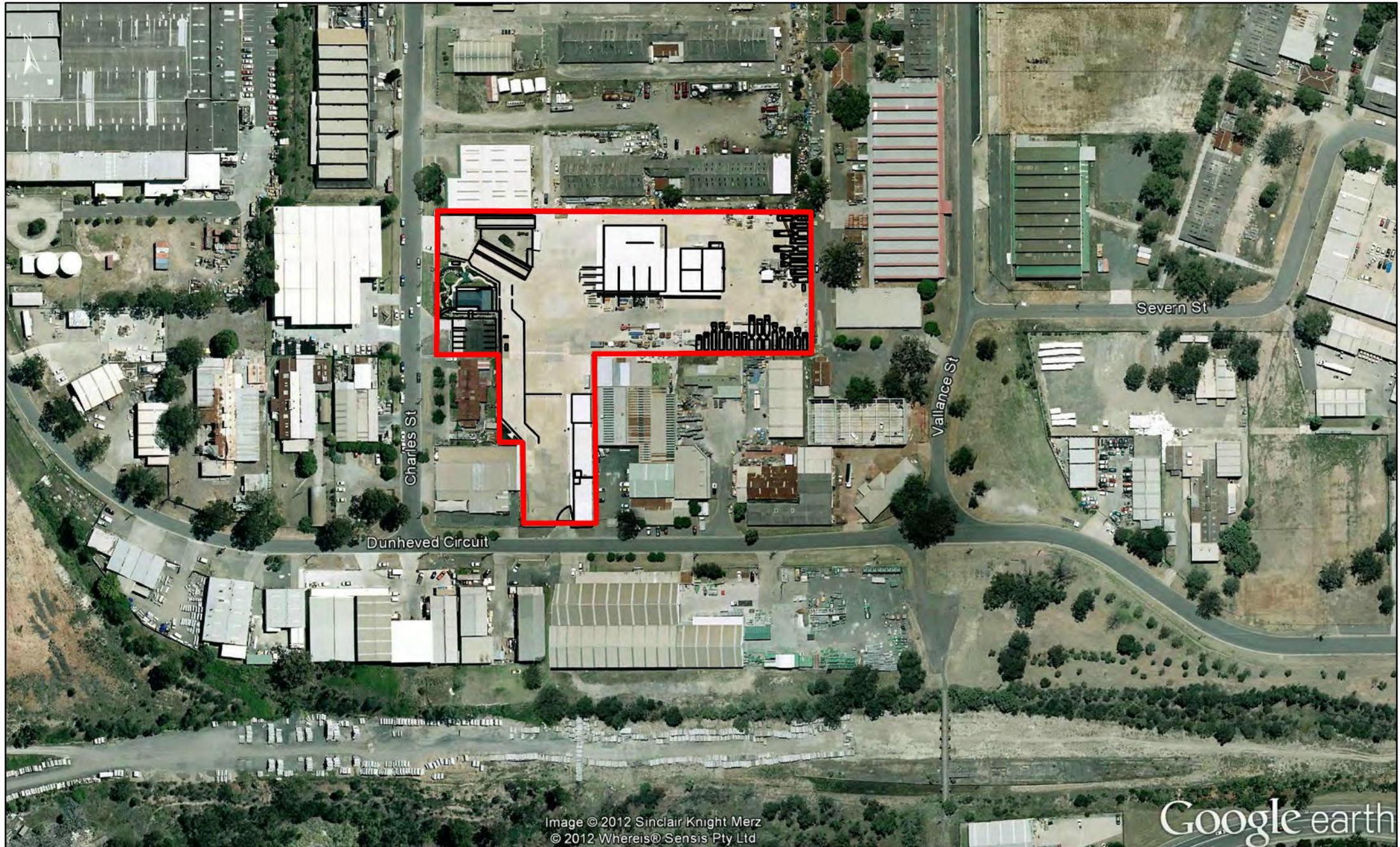


Image © 2012 Sinclair Knight Merz
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Google earth

- Property Boundary
- Proposed Layout

Site Plan
 Waste Management Facility, St Marys
 Source: Worth Recycling (2012)
 0 10 20 40
 Meters

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Fig. 1

2.0 Overview

2.1 Background

Worth is a wholly Australian-owned company that formed in 1976 and commenced operations in the transport and recycling industries. The company has expanded to include collection, transportation, processing and recycling of liquid, sludge and solid waste as well as confined space and industrial cleaning services. Worth has designed, built and currently operates two major wastewater treatment facilities including:

- EPA licensed depot and treatment plant at Windsor – this plant receives and processes oily sludges, slop oils, waste oily waters, contaminated solids/sludges and wastewater emulsions, and has a plant capacity of 1 megalitre per week; and
- Waste oil and wastewater depot and EPA licensed treatment plant at BlueScope Steel, Port Kembla – this plant receives and processes waste oils, sludges and wastewaters from metal making, metalworking and other heavy industries, with a plant capacity of 2.5 megalitres per week.

Worth has operated the Windsor waste treatment plant for 25 years, and the last 10 years have seen rapid growth and diversification. This rapid growth has meant that the Windsor site is not large enough to accommodate the number of processes and future anticipated total volumes of waste to be treated.

As a result of this rapid growth, Worth acquired the St Marys site (the Facility) to receive, store and treat Acid Sulfate Soils (ASS), a non-controlled waste in accordance with the National Environment Protection Measure (NEPM).

A Statement of Environmental Effects (AECOM, 2012) was prepared for the Facility in support of the Development Application (DA) DA 12/0780 which assessed the potential environmental impacts associated with operation of the St Marys Facility. This also included measures to be implemented to minimise and manage these impacts, those of which are relevant to the operation have been incorporated into this plan.

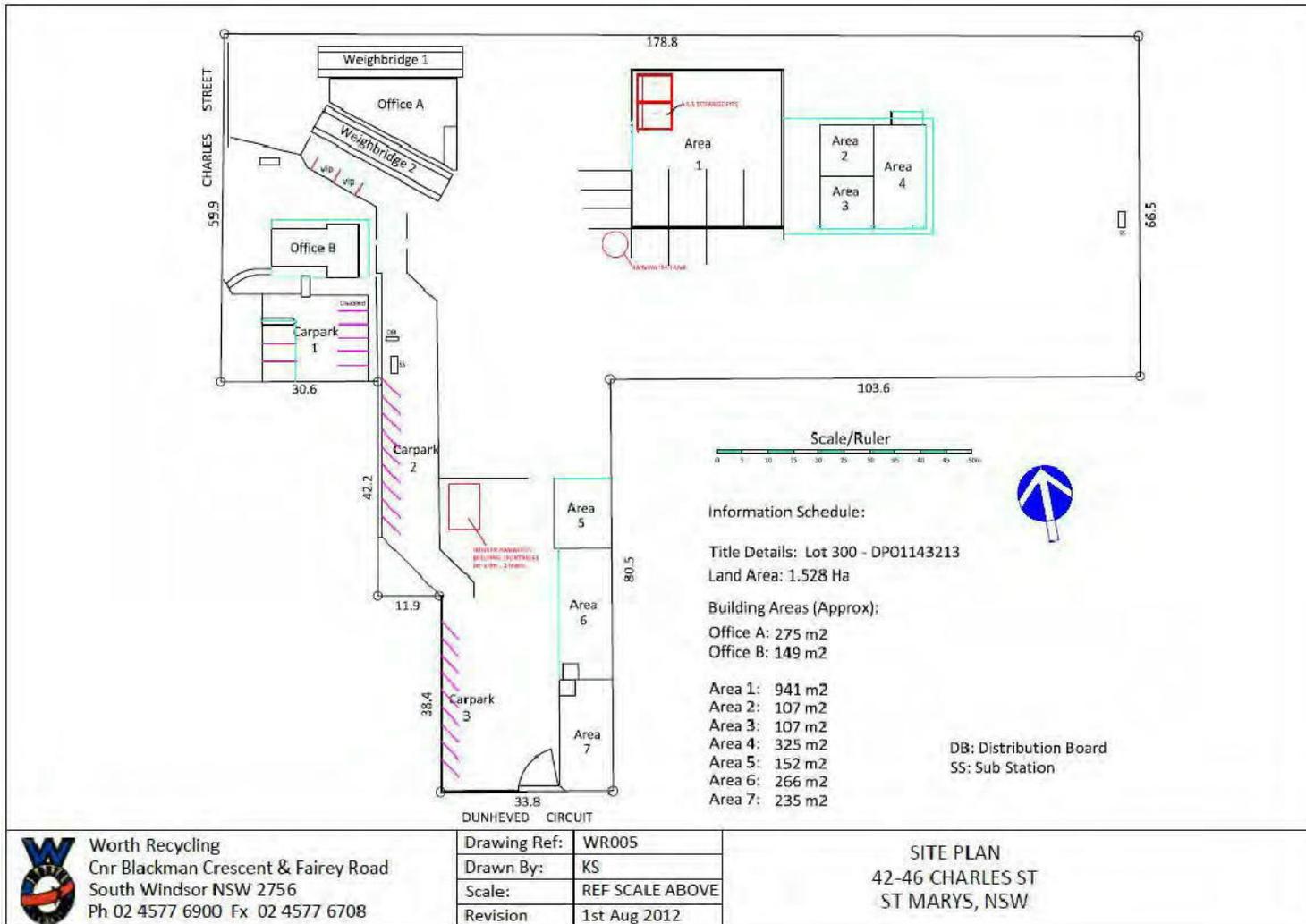
The DA for the Facility was approved in accordance with the *Environmental Planning and Assessment Act 1979* (EP&A Act) by PCC on 31 October 2012. Condition 29 of that approval requires the preparation of an Environmental Management Plan for the approved operations.

2.2 Operation

2.2.1 The Facility

The layout of the Facility is shown on Figure 2 and will consist of:

- Two offices (Office A and B);
- Two weighbridges (Weighbridge 1 and 2);
- Three designated car parking areas, accessible from Charles Street (one for public access, two internal to the Facilities);
- A designated enclosed area (Area 1) for the storage and processing of ASS and associated process materials (e.g. lime slurry), including three semi-enclosed storage bunkers on the western wall;
- A portable amenities building for driver's; and
- Six other enclosed areas for storage.



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Drawing Ref:	WR005
Drawn By:	KS
Scale:	REF SCALE ABOVE
Revision	1st Aug 2012

SITE PLAN
42-46 CHARLES ST
ST MARYS, NSW

Figure 2 Facility Layout

2.2.2 Operational Activities

All access to and from the site will be via Charles Street. Upon entering the site, trucks will cross one of the two weighbridges before proceeding to Area 1 for storage and treatment. ASS materials will be delivered to the Facility via truck and dog with a typical capacity of 25 tonnes. During peak periods the Facility may receive up to 200 tonnes of material per day, equating to approximately sixteen truck movements per day. The Facility has an alternate access point from Dunheved Circuit, however only courier vehicles will access the Facility from this entrance.

ASS will be treated through the application of predetermined doses of lime slurry within Area 1 (refer Figure 2). Material will be mechanically turned over with a small excavator or bobcat. Material will typically be treated for a period of three to five days, after which it will be tested to ensure that it is suitable for disposal. Potential ASS leachate will be managed throughout this process, refer Section 3.6.

Once materials are suitable for disposal off site, treated material will be transported by trucks to a licensed solid waste facility. This equates to approximately sixteen truck movements per day during peak processing periods.

2.2.3 Approved Hours of Operation

Table 2 outlines the approved operating hours for the Facility, including those for delivery and service vehicles.

Table 2 Approved hours of operation

Period	Hours of operation
Monday to Friday	6am to 6pm
Saturday	8am to 2pm
Sundays and Public Holidays	No work

2.3 Statutory Requirements

2.3.1 Project Approval

Development consent was granted for the Facility in accordance with the EP&A Act by PCC on 31 October 2012.

2.3.2 Operational Requirements

This OEMP addresses the applicable requirements of:

- Conditions of consent issued by PCC for Development Application DA12/0780 (Conditions of Consent);
- Relevant New South Wales environment legislation; and
- The Draft Environmental Protection Licence (EPL 20271).

The OEMP has been developed to be consistent with the (former) Department of Infrastructure, Planning and Natural Resources document *Guideline for the Preparation of Environmental Management Plans* (2004).

2.3.3 Environmental Protection Licence

Schedule 1 of the *Protection of the Environment Operations Act 1997 (POEO Act)* details activities for which an EPL is required. This includes waste processing (non-thermal treatment) above the following thresholds:

- Processing more than 120 tonnes of waste per day, or 30,000 tonnes per year; and
- Having more than 200 kilograms of waste on site at any time.

As the facility will process waste in excess of these thresholds the operations are classified as a scheduled activity and require an EPL under the POEO Act.

Worth has applied for an EPL (draft EPL application number 20271) from the Environment Protection Authority (EPA) for the scheduled activity of Waste Processing (non-thermal treatment of hazardous and other waste) of Potential Acid Sulfate Soils (PASS) at the Facility.

3.0 Environmental Management Plans

3.1 Management of Environmental Impacts

The following areas of environmental management are considered to warrant specific actions during the operation of the Facility:

- Air quality, including odour and dust management;
- Waste management, including solid and liquid waste (including wastewater from treatment processes);
- Spill contingency and response;
- Vehicle movements;
- Stormwater management and drainage; and
- Noise control.

These potential environmental impacts are listed under condition 29 of the Conditions of Consent and are considered to have the potential to result in non-compliance with legislative requirements or generate community complaints if not effectively managed.

The following management plans, as specified in condition 19 of the consent, identify the requirements associated with potential environmental impacts of the Facility and specify the actions required to manage the environmental risks to comply with regulatory requirements.

3.2 Air Quality Management Plan

3.2.1 Objectives

The objectives of the Air Quality Management Plan are to enable management of emissions related to operation of the Facility so as to not adversely impact surrounding properties or the environment.

3.2.2 Sources

Sources of air pollution include products of fuel combustion from vehicles and equipment and fugitive dust emissions, associated with material handling processes such as unloading and turning of ASS materials during treatment, and loading of treated general solid waste materials into trucks for disposal off site.

3.2.3 Mitigation Measures

Table 3 identifies mitigation measures to be implemented to manage potential air quality impacts associated with the Facility.

Table 3 Air quality mitigation measures

Trigger	Impact	Mitigation Measures
Fuel combustion emissions from vehicles and equipment	Increased risk to human health and greenhouse gas emissions	<ul style="list-style-type: none"> • All plant and equipment will be kept in good working order to minimise excessive vehicular emissions
Fugitive dust from exposed surfaces (e.g. stockpiles)	Nuisance (dust and odour) Discolouration of buildings or structures Increased risk to human health	<ul style="list-style-type: none"> • Processing of ASS materials is to be undertaken in dedicated bunkers in Area 1 only • Waste bins are to have lids fitted and closed to prevent odours migrating from the site • ASS and other potentially dust emitting materials are to be delivered to site in covered vehicles and wetted where required to minimise dust and odour emissions • Any spills of material are to be thoroughly cleaned in a timely manner to prevent dust emissions • Lime is to be delivered to the Facility as a slurry therefore reducing

Trigger	Impact	Mitigation Measures
		the likelihood of any dust emissions
Vehicles tracking mud and soil onto local roads	Potential dust implications to surrounding properties	<ul style="list-style-type: none"> Mud and soil from vehicular movements to and from the site will be removed from vehicles prior to entering and leaving the site

3.3 Waste Management Plan

3.3.1 Objectives

The objectives of the Waste Management Plan are to ensure waste is managed in accordance with the Conditions of Consent and EPL for the Facility, and do not adversely impact surrounding properties or the environment. The Waste Management Plan incorporates the waste material processing plan, which is an EPL condition for the Facility.

A detailed Waste Management Plan has been developed for the Facility and is contained within Appendix A.

3.3.2 Sources

The sources of waste include:

- General Office and amenity buildings waste (putrescible);
- Recyclable office and amenity waste;
- Waste water (sewage); and
- Treated ASS materials and process wastewater.

3.3.3 Mitigation Measures

Table 4 identifies mitigation measures to be implemented to manage waste impacts associated with the Facility.

Table 4 Waste management mitigation measures

Trigger	Impact	Mitigation Measures
Management of transported ASS materials	Potential implications to surrounding properties and the environment	<ul style="list-style-type: none"> All deliveries of ASS materials to the site must be accompanied by an Acid Sulfate Soil Management Plan as specified in condition 14 All ASS materials removed from the site is to be disposed of at an appropriately licensed landfill as specified in condition 18 The materials entering and exiting the site will be tracked via a materials tracking process. Two weigh bridges will be used by trucks immediately upon entering the site via Charles Street and directly prior to exiting the site, therefore the materials on site will be tracked accurately. Security gates will also restrict access to and egress from the site A waste data form for recording waste movement will be developed and will include solid and inert waste materials, provision of a description of the waste types, physical nature of wastes, proposed treatment, dates of movement, transporters and waste destination details
Waste Processing Management	Potential implications to surrounding properties and environment	<ul style="list-style-type: none"> All waste material for processing at the site and disposal from the site will be assessed and classified in accordance with the EPA's <i>Waste Classification Guidelines</i> All ASS related material to be received, treated, stored and disposed of from the site will be in accordance with a Waste Management Plan All above ground tanks containing material that is likely to cause

Trigger	Impact	Mitigation Measures
		<p>environmental harm, including dangerous goods and hazardous substance, will be contained within a bunded area so as to contain 110% of the volume of the largest vessel stored within the bunded area</p> <ul style="list-style-type: none"> All waste materials, including drums and containers containing ASS and drums and containers contaminated with residues of ASS, will be handled and stored only within the bunded area and under cover at all times Wastewater generated as a result of ASS materials treatment processes will be captured and removed by a licenced contractor, separate to the stormwater drainage and treatment network as specified in condition 21
Management of site generated wastes	Potential implications to surrounding properties and the environment	<ul style="list-style-type: none"> Waste hierarchy implementation. Designated bins are to be provided in site office and staff areas for: <ul style="list-style-type: none"> Recyclables (glass, plastic, paper) Putrescible waste for disposal. All bins are to be fitted with sealed lids to minimise odour and pest problems All wastewater from site amenities to be regularly removed by a licensed waste water contractor All general inert and solid waste generated would be stored in waste containers located at designated points, isolated from surface water drains Site stormwater pit sediment trap is to be emptied as required

3.4 Spill Management Plan

3.4.1 Objectives

The objectives of the Spill Management Plan are to minimise the likelihood of occurrence of a spill, and that if a spill occurs that they are managed accordingly to ensure no adverse impacts to surrounding properties or the environment.

3.4.2 Sources

The source of spills will likely include lime slurry and other chemicals / fuels stored on site related to operation of the Facility. The management of acidic waste water as a result of the ASS treatment process is considered in the Waste Management Plan (refer to Appendix A).

3.4.3 Mitigation Measures

Table 5 identifies mitigation measures to be implemented to manage spillage impacts associated with the Facility.

Table 5 Spill management mitigation measures

Trigger	Impact	Mitigation Measures
Uncontrolled spills of materials / chemicals related to operations	Adverse impact on human health or the environment	<ul style="list-style-type: none"> Lime slurry will be stored only within the enclosed shed marked as Area 1 on Figure 2 as specified in condition 16 All works and storage areas where spillages are likely to occur (e.g. areas where ASS and lime slurry is stored) will be bunded, with a minimum capacity of 10 percent of the total volume of containers stored on site or 110 percent of the largest container stored (whichever is greater) to contain spills

Trigger	Impact	Mitigation Measures
		<ul style="list-style-type: none"> Spill kits will be stored at areas where ASS and lime slurry is stored, with staff trained in the prompt response to any liquid or slurry spill Materials Safety Data Sheets (MSDS) detailing action to be taken to safely control spills of hazardous materials and Dangerous Goods will be available at the site office

3.5 Traffic Management Plan

3.5.1 Objectives

The objectives of the Traffic Management Plan are to prevent or minimise adverse environmental impacts from traffic associated with the Facility and to comply with regulatory requirements.

3.5.2 Sources

The primary source of traffic impacts resulting from the Facility will be from trucks travelling to and from the site.

The management of noise emissions associated with truck movements is considered in the Noise Management Plan (refer to Section 3.7).

3.5.3 Mitigation Measures

Table 6 identifies mitigation measures to be implemented to manage traffic associated with the Facility.

Table 6 Traffic management mitigation measures

Trigger	Impact	Mitigation Measures
Interaction between Facility operations and the general public	Potential safety implications	<ul style="list-style-type: none"> All vehicles are to enter and leave the premises in a forward motion No vehicles or equipment are to be parked outside the premises of the facility. Cars are to be parked in appropriately-marked bays within the premises Trucks will enter and leave via the Charles Street entrance only to assist the internal traffic movements Courier vehicles are to enter and exit via the Dunheved Circuit entrance
Increased road usage of local roads in vicinity of Facility	Increased noise and traffic on surrounding roads	<ul style="list-style-type: none"> Deliveries to and from the premises will occur only within approved designated operation hours as specified in Table 2

3.6 Stormwater Management Plan

3.6.1 Objectives

The objectives of the Stormwater Management Plan are to ensure that stormwater discharged from the site does not cause pollution of downstream waterways.

3.6.2 Sources

The source of stormwater to be discharged from the site includes any stormwater captured from impervious areas including carparking, hardstand, and building rooves.

3.6.3 Mitigation Measures

Table 7 identifies mitigation measures to be implemented to manage stormwater impacts associated with the operation of the Facility.

Table 7 Storm water management mitigation measures

Trigger	Impact	Mitigation Measures
Contamination of stormwater	Potential downstream environmental impacts	<ul style="list-style-type: none"> • All ASS and lime handling and mixing is to occur within the covered sheds only • Diversion drains at the toe of stored ASS will direct runoff that potentially contains acidic water to an onsite tank for collection and off-site disposal at a suitably licenced facility that is licensed under the POEO Act to receive that type of waste/leachate • Spill containment and response kits are to be provided as detailed in Table 5
Discharge of stormwater to PCC stormwater system	Potential downstream environmental impacts	<ul style="list-style-type: none"> • All site surface water are to be discharged via a Humeceptor treatment device currently on site (as specified in condition 25) and this treatment device is to be serviced on a quarterly basis • The existing stormwater network is not to be altered or new lines directed into PCC's stormwater drainage system unless approved by PCC as specified in condition 13
Discharge of vehicle washbay wastewater to Sydney Water sewer system	Potential downstream environmental impacts	<ul style="list-style-type: none"> • All vehicles operating within the bunded area are to be cleaned within the bunded area directly east of Area 1 (refer Figure 2) and all cleaning products used, including water, are to be captured and treated • All vehicle washbay wastewater from Area 5 (refer Figure 2) will be captured and discharged via the trade waste system to Sydney Water sewer as specified in condition 26 • All vehicles leaving the bunded areas are to pass through the wheel wash before leaving the premises

3.7 Noise Management Plan

3.7.1 Objectives

The Facility is to be operated to avoid the generation of offensive noise and to minimise noise impacts on the surrounding properties.

3.7.2 Sources

Noise sources related to the operation of the Facility include traffic movements to and from site; unloading and loading of trucks, and vehicles and plant on site.

3.7.3 Mitigation Measures

Table 8 identifies mitigation measures to be implemented to manage noise impacts associated with the Facility.

Table 8 Noise management mitigation measures

Trigger	Impact	Mitigation Measures
Vehicles entering and leaving the Facility	Elevated noise levels	<ul style="list-style-type: none"> The Facility will only operate within designated approved operating hours as specified in Table 2
Noise-emitting activities carried out at the Facility		<ul style="list-style-type: none"> Vehicles and plant on site will be kept in good working order to minimise noise emissions Processing of ASS will be undertaken within the existing shed (Area 1, refer Figure 2) which will further mitigate noise emissions associated with the operations Only two pieces of plant within the premises are to be operational at any one time during ASS material treatment activities as specified in condition 20

4.0 Training

Training as part of the OEMP will be undertaken in accordance with Worth's internal environmental training schedule outlining the roles and responsibilities of all personnel on site with respect to environmental management. This typically includes:

- site inductions for new employees and contractors completed as per EHS-003: Induction, Training and Competence; and
- toolbox talks for onsite personnel completed as per EHS-006: EHS Communication and Consultation.

All training records shall be maintained within the training and induction register.

All contractors and visitors to the site are to be inducted on expected environmental behaviour, as well as specific training where necessary.

5.0 Community Protocols

5.1 General Enquires

Worth's general contact details including phone number and email are:

Phone: (02) 8558 5100
Fax: (02) 8558 5122
Email: enquiries@worthrecycling.com.au

Contact can also be made via the electronic enquiry form on Worth's website.

<http://www.worthrecycling.com.au/contact-us.html>

5.2 Complaints Management

Complaints can be made through the contact details which are listed in Section 5.1.

All complaints received must be recorded including investigations undertaken, conclusions formed and actions taken. Notification about the complaint and any associated response must be provided to the Site Manager in a timely fashion.

The complaint response procedure will include documentation of:

- a) the time, date name and contact details of the complainant;
- b) reasons for the complaint;
- c) any investigations undertaken;
- d) conclusions formed; and
- e) any actions taken.

6.0 Environmental Reporting

It is the responsibility of the Site Manager to ensure Worth's environmental objectives and targets, performance, legal and other requirements, and results of audits and reviews, are communicated effectively to staff. External stakeholders such as relevant regulatory authorities and the community are to be advised, as appropriate, of incidents, their consequences and actions taken to prevent re-occurrence.

Existing systems that are used to communicate and report environmental issues include:

- staff and contractor inductions as per EHS-003: Induction, Training and Competence;
- management review meetings as per MAN-008: Management Review;
- incident reporting system as per EHS-002: Incident Reporting and Investigation;
- stakeholder meetings;
- notice boards, posters and bulletins as per EHS-006: Communication and Consultation; and
- health, safety and environmental policies:
 - POL-001 Work Health & Safety Policy;
 - POL-002 Environmental Management Policy; and
 - POL-003 Quality Policy.

6.1 Incident Reporting and Corrective Action

Environmental incidents on site are to be managed in accordance with the existing Worth procedure EHS-002: Incident Reporting and Investigation. The procedure defines the actions necessary to identify and investigate non-conformances, the reporting of environmental incidents and serves to implement actions to mitigate any associated environmental impacts. This includes the duty to report any pollution incidents that cause or threaten material harm to the environment to PCC or other appropriate regulatory authority.

A Pollution Incidence Response Management Plan (PIRMP) will also be developed for the site in accordance with Part 5.7A of the NSW POEO Act, which will detail the procedures to follow in the event of a pollution incident. All relevant authorities must be notified immediately if there is a pollution incident if there is a risk of material harm to the environment. Material harm includes:

- actual or potential harm to the health and safety of human beings, or to ecosystems, or
- actual or potential loss or property damage, exceeding \$10 000.

The objectives of the PIRMP will be to:

- ensure comprehensive and timely communication about a pollution incident to staff, neighbouring premises and the relevant authorities;
- minimise and control the risk of a pollution incident through identification of risks and the development of planned actions to minimise and manage those risks; and
- ensure the plan is properly implemented by trained staff; responsibilities identified, and ensuring the plan is regularly reviewed for accuracy, currency and suitability.

The PIRMP will detail the:

- roles and responsibilities of employees in the event of an incident;
- pollution response plan;
- pollution notification process;
- emergency response procedures; and
- procedure for communicating with the local community.

Staff training regarding the PIRMP will be undertaken and the PIRMP will be reviewed at least annually and within one month of any reportable pollution incident.

6.2 Emergency Response

In the event of an emergency, the procedure identified in the site's Emergency Response Plan (ERP) must be implemented. The requirements of the ERP are contained within the intranet site for St Marys, under B. Emergency Procedures. The ERP is to be made available to all Worth employees, and any others, through site inductions; and hard copies are to be maintained on site.

6.3 Auditing

Environmental audits are to be undertaken to establish whether activities and processes conform to environmental management requirements, whether the OEMP is being properly implemented and maintained, and to identify any areas for improvement.

Scheduled auditing include:

- weekly site inspections; and
- event-based audits.

6.3.1 Internal Auditing

Weekly Site Inspections

Weekly site inspections are to be undertaken by the Site Manager. These audits are to consist of a visual inspection of all work areas and activities to check compliance with the OEMP, EPL, PIRMP and Conditions of Consent. At a minimum, inspections are to check for:

- excessive noise from vehicles, plant and works, ensuring an efficient working order;
- air quality, including dust generation and any sources, potential or current;
- water or liquid discharge from any plant, ASS material treatment processes or vehicle washbay area;
- problems with bunded areas or dangerous goods storage areas;
- capacity of the stormwater sediment trap;
- spillage/issues with storage bunkers and general site cleanliness;
- trucks abiding by driving techniques outlined during training and site induction; and
- tracking of materials onto external roads.

Any non-conformances identified during the weekly inspections are to be recorded on an Incident Report form and submitted to the Compliance Manager. Any corrective actions will be captured and tracked via the Action Tracking Tool with the responsible manager to carry out the corrective measures as required.

Event Based Checks

Event based checks are to be conducted by the Site Manager or Worth's Compliance Manager following any significant event that may have environmental impacts on site, such as heavy rainfall, high winds, any suspected environmental incident or the receipt of an environmental complaint.

As a result of event based checks, any actions are to be recorded on an Incident Report form and submitted to the Compliance Manager. Any corrective actions will be captured and tracked via the Action Tracking Tool with the responsible manager to carry out the corrective measures as required.

7.0 Document Management

7.1 Document Control

Where practicable, documents and records shall be stored and maintained in controlled access areas. Records shall be prepared as required during the performance of activities. All documents listed in the Document Register are to be controlled as per Worth's MAN004 Document and Records Management procedure.

7.2 OEMP Document Review

This OEMP is not intended to be a static document, and is to be maintained and updated in the instance that operational or environmental conditions relating to the operations change. The review will be undertaken by the Worth Compliance Manager, and the most recent version maintained in electronic format on the Document Register.

7.3 Document Management Responsibilities

The Worth Compliance Manager is responsible for managing the development or amendment of all system procedures and templates and for the maintenance and disposal of environmental records and management systems.

At a site level the Site Manager (or nominated alternate) is responsible for:

- establishing and maintaining the Document Register;
- ensuring that a document is raised or revised once a need has been identified;
- nominating the author;
- detailing the document's scope and purpose and issue date;
- ensuring review and approval of all assigned documents and amendments;
- determining distribution requirements; and
- entering approved document details into the Document Register.

Personnel nominated by the Site Manager and / or Compliance Manager are responsible for the collection, filing, storage and maintenance of environmental records.