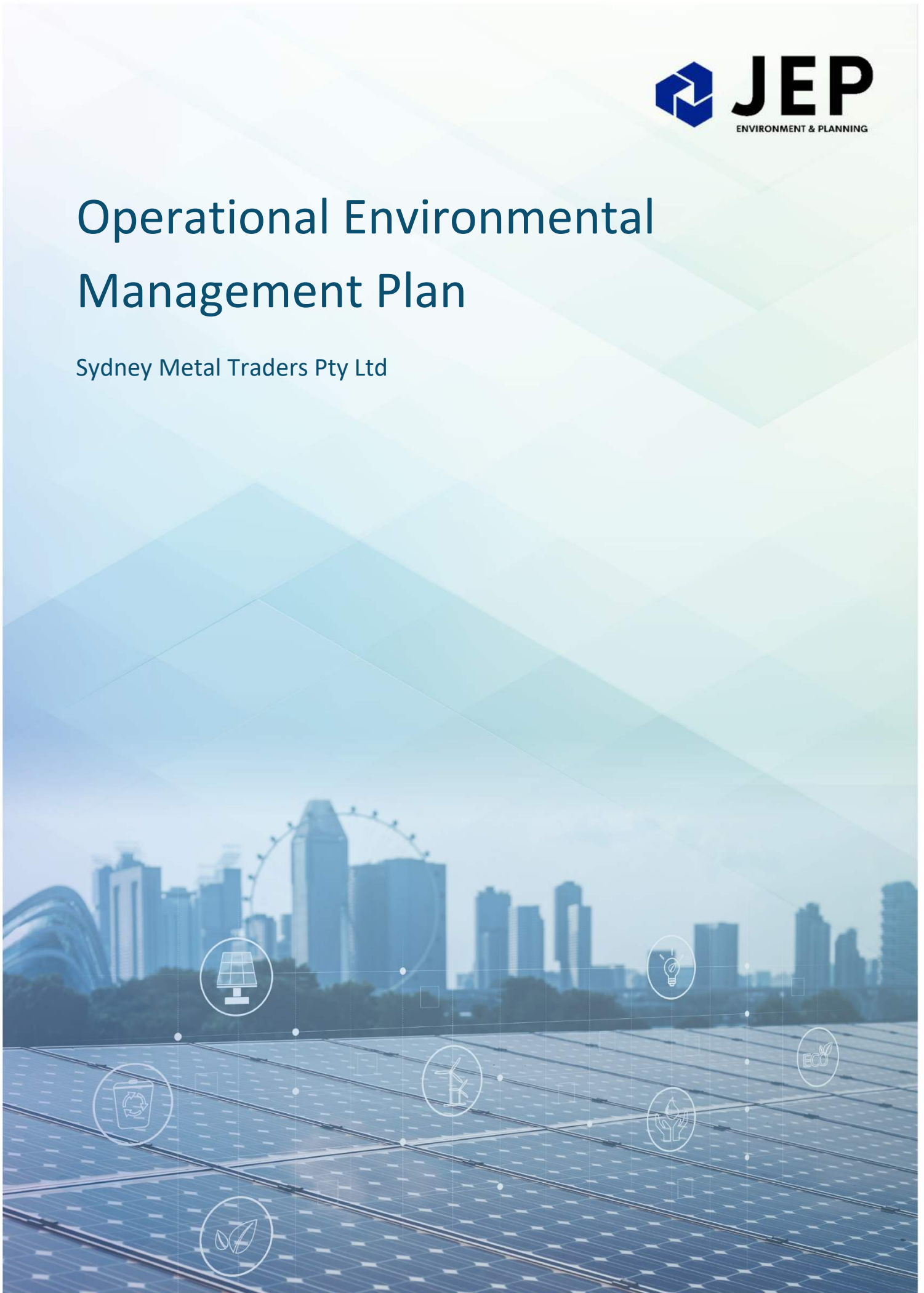


Operational Environmental Management Plan

Sydney Metal Traders Pty Ltd



Prepared for Sydney Metal Traders Pty Ltd
JEP Environment & Planning
ABN 43 614 057 788
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We declare that

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Note that in accordance with the Land and Environment Court Practice Note (2025) *Use of Generative Artificial Intelligence (Gen AI)*, we declare that Gen AI has not been in the preparation of this report.

Version	Authors	Date	Reviewer	Approved for issue	Date
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1. Introduction

This Operational Environmental Management Plan has been prepared by JEP Environment & Planning, on behalf of Sydney Metal Trader's scrap metal recycling facility (the Facility) located at 88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779).

The Facility will sort and recycle a maximum of 30,000 tonnes per year of scrap ferrous, non-ferrous and mixed metals from households and commercial businesses in the region. This Operational Environmental Management Plan sets out specific mitigation measures or controls to avoid or minimise negative environmental impacts associated with the operation of the Facility.

This OEMP summarises the characteristics of the Facility, the location, operating hours, how scrap metals will be received, sorted and recycled, including traffic management, operations, handling of residual waste (floc) and loading of processed metals for off-site recycling or further processing.

This OEMP also outlines the internal movements of scrap metal within the Facility environment, the dust suppression and stormwater collection system in place, storage of shredded metal and off-site transport of final recycled materials from the operation.

The OEMP has been developed in alignment with AS/NZS ISO 14001:2016 *Environmental management systems* and has considered *Environmental Management Systems Guidelines - Risk-based licensing* (NSW EPA, 2015). The OEMP outlines the policies, systems and procedures that Sydney Metal Traders have committed to for protecting the environment during the operation of the Facility, and considers how key environmental and operational issues will be managed, including:

- Traffic and parking;
- Air Quality;
- Noise and Vibration;
- Non-Conforming Waste;
- Stormwater Pollution;
- Emergency Preparedness and Response;
- Fire Prevention;
- Weighbridge Management;
- Pollution Incident Response;
- Waste Management; and
- Daily site inspections;

Note that the OEMP has considered the NSW EPA (2016) *Guide to Licensing* in developing the OEMP for the Facility. However, the Site processes less than 150 tonnes per day of scrap metal and less than 30,000 tonnes per year. The Site is therefore under the threshold that requires an EPA license and the Facility does not require an EPL at this time (as long as thresholds are not exceeded). The Facility receives principally scrap ferrous and non-ferrous metal for sorting, size reduction and transport off-site for further recycling.

1.1. Policy drivers supporting the Facility

The *NSW Waste and Sustainable Materials Strategy 2041: Stage 1 – 2021* sets out the long-term vision for managing waste, planning for infrastructure, reducing carbon emissions, creating jobs, and refocusing the way NSW produces, consumes and recycles products and materials. The strategy will be used to track, review and measure NSW's progress toward meeting the targets set out in the National Waste Policy Action Plan. The targets are to:

- Reduce total waste generated by 10% per person by 2030;
- Have an 80% average recovery rate from all waste streams by 2030;

- Significantly increase the use of recycled content by governments and industry;
- Phase out problematic and unnecessary plastics by 2025; and
- Halve the amount of organic waste sent to landfill by 2030.

In addition to the above National targets, NSW has committed to:

- Introduce a new overall litter reduction target of 60% by 2030;
- Introduce a plastic litter reduction target of 30% by 2025, as set out in the NSW Plastics Action Plan;
- Set a goal to triple the plastics recycling rate by 2030, as set out in the NSW Plastics Action Plan;
- Reaffirm NSW's commitment to the goal of net zero emissions from organic waste by 2030, as laid out in the
- NSW Net Zero Plan Stage 1: 2020–2030;
- Establish new indicators to help track NSW's progress on infrastructure investment and the cost of waste services; and
- Develop a new measure of the emissions performance of NSW's waste and materials management. This will help to track performance across the lifecycle of materials.

A major focus area of the strategy is to increase waste infrastructure and services to meet future needs. The highest priority is to extend the life of existing landfills by reducing the volumes of waste being sent to landfill. Whilst the main focus is on waste avoidance, improving recycling capacity is an important aspect of waste management.

The proposed development will commit to environmental sustainability, waste avoidance and reduction practices. The proposed development will also increase and expand recycling infrastructure in the Goulburn region and will make an important as well as increased recycling to help meet the waste targets under the *NSW Waste and Sustainable Materials Strategy 2041*.

1.2. OEMP Objectives

The objectives of the OEMP are to:

- Support operations of the Development in accordance best practice;
- Ensure compliance with all relevant regulatory requirements;
- Minimise the environmental impacts of the Development during operations;
- Maintain a high level of environmental performance through on-going training and inductions;
- Ensure the commitments made in the approval's documentation are fully implemented and/or complied with during operations; and
- Ensure the environmental risks associated with the operations of the Development are effectively managed.

1.3. Facility Objectives

The objective of the proposed development is to support the economic growth and resource recovery needs of the Southern Tablelands Region, which is aligned to Goulburn Mulwaree Council's vision statement of '*A sustainable environment which utilises best practice to minimise waste and maximise renewables - Vision 2040*'. The proposed development will involve construction and operations of metals recovery facility from scrap materials of up to 30,000 tonnes per annum (tpa). The facility will assist in job creation and contribute to increasing the land valuation of Goulburn Mulwaree Council lands.

Sydney Metal Traders Pty Ltd is a locally owned and operated company since 2010. Sydney Metal Traders (SMT) Pty Ltd operate a current metal recycling facility at 11-21 Claremont Avenue Greenacre NSW 2190 and is proposing to supplement their recycling operations in Greenacre to include 88 Murrays Flat Road Towrang NSW 2580 (Lot 3 DP251779).

1.4. Site Description

The Proposal includes development of a metals recycling facility at 88 Murrays Flat Road Towrang NSW 2580 (Lot 3 DP251779). The Site will receive scrap metal, shred and separate the metals for transport off-site to a recycling facility. The operations will be carried out on an area of approximately 6.6 hectares (the Site) out of a total lot area of 32.3 hectares.

The Facility will include the following components and infrastructure:

- Reveal and Sorting Areas – Bays for the tipping, inspection, and initial sorting of incoming scrap metals;
- Pre-Shredding and Shredding Zones – Equipped with pre-shredders, hammermill shredders, stationary shears and oxy-cutting facilities;
- Post-Processing Separation Facility – Bays for the separation, recovery, and temporary storage of processed ferrous and non-ferrous metals;
- Administrative Infrastructure – Adaptation of the existing on-site cottage into office and staff amenity space including staff parking area;
- Workshop and Maintenance Shed – A fully enclosed 32m x 15m x 12m structure for plant maintenance and operations;
- Mobile and Stationary Equipment – Including loaders, shears, conveyors, radiation detection equipment, and sorting systems;
- Weighbridges – Two entry/exit weighbridges for the accurate measurement of materials and heavy vehicle management and one internal weighbridge;
- Fuel Storage – A 50,000L self-bunded diesel tank, installed on a concrete hardstand with protective bunding and rain cover;
- Landscaping and Visual Screening – A 20-metre-wide landscaped setback along the western and southern Site boundaries;
- Traffic Management and Site Circulation – Paved hardstand access ways using existing access points with the addition of a new exit closer to the Hume Highway to minimise impacts on local roads and residential areas;
- Intersection Upgrades – To improve safe intersection sight distances (SISD), accommodate anticipated turning volumes, and provide a safe environment for both light and heavy vehicles accessing the Site, the following intersection and turning upgrades are proposed:
 - A channelised left-turn lane (CHL) is to be constructed at the northern intersection (for eastbound traffic). The CHL will improve safe intersection sight distance (SISD) for vehicles approaching the Hume Highway from Murrays Flat Road. CHL to be 185 metres, including chevron line marking for guidance;
 - A channelised right-turn lane (CHR) is to be constructed at the southern intersection (for westbound traffic) from the Hume Highway (westbound) into Murrays Flat Road. CHR to be 185 metres, in compliance with Austroads standards.
 - The right-turn movement from Murrays Flat Road onto the Hume Highway will be prohibited for all vehicles, along with any U-turn movements for eastbound vehicles intending to travel back towards Goulburn;
 - Installation of a median island to guide traffic and prevent right-turn movements from Murrays Flat Road (towards the west);
 - Construction of a 1.0-metre-wide median island on Murrays Flat Road, offset by 1.0 metre from the Hume Highway, to separate inbound and outbound traffic and provide safe clearance; and
 - Installation of regulatory signage and line marking to prohibit right-turn movements from Murrays Flat Road.

- Renewable Energy Infrastructure – The Facility will incorporate rooftop solar photovoltaic (PV) panels installed on the Workshop and Maintenance Shed, with power stored via an integrated Battery Energy Storage System (BESS);
- Wastewater system upgrades for on-site effluent treatment and disposal; and
- Stormwater Management – All operational areas will be constructed of compacted road base incorporating HDPE liners beneath operational areas, stormwater capture systems, and detention basins. The stormwater management system is designed to progressively capture and treat runoff through a series of infrastructure elements.

The Facility will receive and process scrap metal sourced from Sydney, Goulburn, the ACT, Southern Highlands, and surrounding regional areas. Processed materials will be transported to both local and overseas markets for recycling and end use.

The proposed scrap metal processing will be carried out in designated operating areas. Equipment used for the metal processing activities will comprise oxy-cutting, stationary shear, pre-shredder, shredder (hammermill), and downstream separation and sorting equipment.

Around 3% of incoming scrap metal has been processed off Site or does not require further processing and is received in a form ready for on-sale. This material includes Copper, Brass, Aluminium, Stainless Steel, Electric Motors, Batteries (ULABs) and Lead. Separate waste storage bays will be provided to store sorted and shredded metals prior to being loaded onto trucks for off-site recycling. The waste generated during operations will be safely and lawfully disposed at a licensed landfill.

Depollution activities will occur within a purpose-built enclosed structure identified in the architectural plans as the Depollution Bay. This area is designed to safely receive end-of-life vehicles (ELVs) for the removal of hazardous fluids and components prior to shredding or further processing. Upon arrival, whole vehicles will be inspected and transferred to the depollution bay where trained personnel will undertake the draining of oils, fuels, brake fluids, coolants, and other hazardous substances, using industry-standard vacuum and containment systems. Fluids will be securely stored in bunded, clearly labelled tanks or containers, pending lawful off-site disposal at a licensed waste facility.

Refer to Figure 1.1, Figure 1.2, Figure 1.3, Figure 1.4 and Figure 1.5 for the proposed site location, plan, land use zoning and proposed intersection upgrades.

1.5. Nearest sensitive receptors

The proposal site is located within an E4 General Industrial zone, situated in a predominantly rural setting. While the area is zoned for industrial use it is largely surrounded by residential dwellings. The nearest dwelling is approximately 280 metres from the subject site. The closest commercial establishment, The Broadway Estate, is located about 470 metres away. All other residential dwellings are situated at a greater distance, generally beyond a 2-kilometre radius from the Site.

1.5.1. Sensitive land uses

There are no hospitals or schools located in the immediate vicinity of the Site.

1.5.2. Waterway

A waterway traverses the site from south to north, situated directly east of the proposed development area. This waterway connects to a series of existing farm dams and is protected by a vegetated buffer strip before discharging into the Wollondilly River approximately 850 metres north of the site boundary.

The site is also located within the Sydney Drinking Water Catchment, which necessitates the implementation of appropriate stormwater management, erosion, and sediment control measures to ensure water quality is protected during construction and operation.

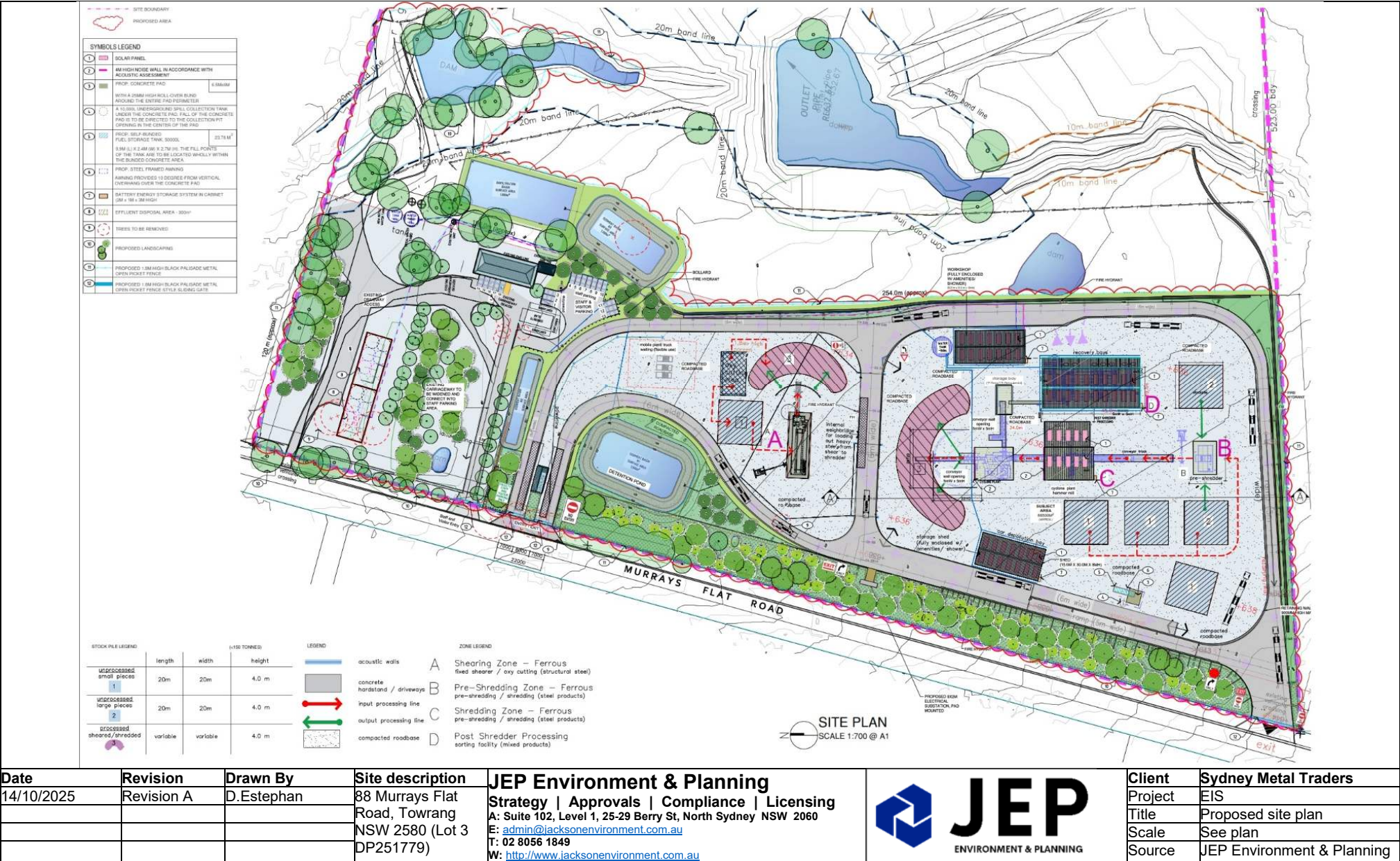
1.5.3. Habitat

The site is predominantly cleared and highly modified due to historical agricultural activities, with limited remnant vegetation and low overall habitat value. The Biodiversity Assessment determined that no threatened flora species or ecological communities listed under the BC Act or EPBC Act are present on the site. However, small patches of

vegetation in the southern portion of the site contain features such as hollow-bearing trees and scattered paddock trees, which may offer marginal foraging or shelter opportunities for some native fauna, including microbats and common woodland birds. These features are limited in extent and are not considered core habitat for any threatened species.

The proposed development has been designed to avoid areas of higher habitat value where feasible, and a vegetated buffer will be retained along the eastern waterway corridor, supporting landscape connectivity. Overall, the site is considered to have low biodiversity sensitivity, and impacts on habitat are expected to be minimal and manageable through standard construction-phase mitigation and post-construction landscaping measures.

Figure 1.1 Site layout plan.



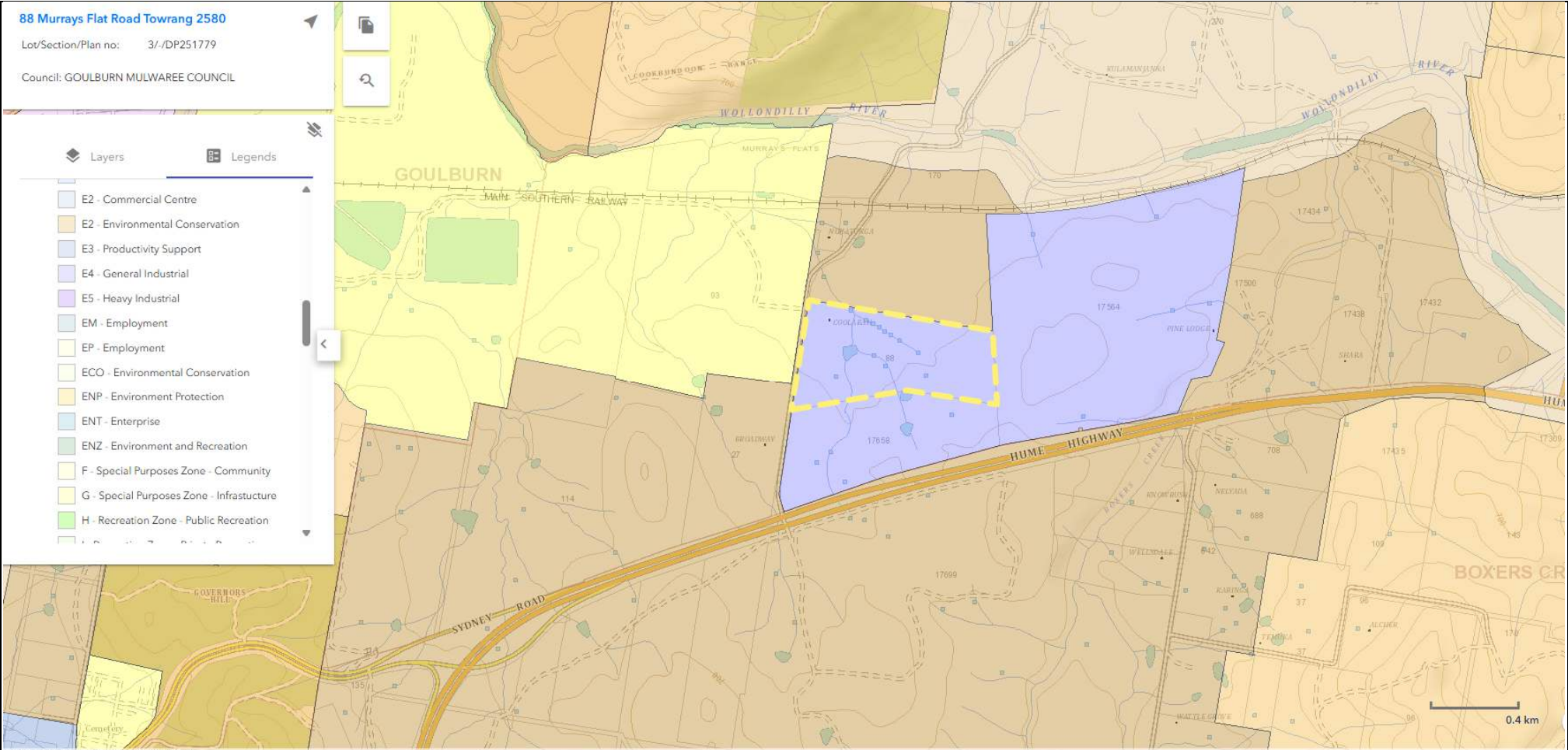
Date	Revision	Drawn By	Site description	JEP Environment & Planning	Client	Sydney Metal Traders
14/10/2025	Revision A	D.Estephan	88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779)	Strategy Approvals Compliance Licensing A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	Project	EIS
					Title	Proposed site plan
					Scale	See plan
					Source	JEP Environment & Planning

Figure 1.2 Aerial View of the nearby region. Approximate site boundary shown in red. Blue is the indicative site area of the Proposal.



Date	Revision	Drawn By	Site description	JEP Environment & Planning Strategy Approvals Compliance Licensing A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au 		Client	Sydney Metal Traders
13/07/2025	Revision A	D.Estephan	88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779)			Project	EIS
						Title	Aerial view
						Scale	See plan.
						Source	Nearmaps

Figure 1.3 Land use zoning of the site and locality under Goulburn Mulwaree LEP 2009. Approximate lot boundaries are shown in yellow.



Date	Revision	Drawn By	Site description	JEP Environment & Planning
13/07/2025	Revision A	D.Estephan	88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779)	Strategy Approvals Compliance Licensing A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au



Client	Sydney Metal Traders
Project	Environmental Impact Statement
Title	Land zoning
Scale	See plan
Source	NSW Planning Portal

Figure 1.4 Proposed Intersection Upgrades (CHL).

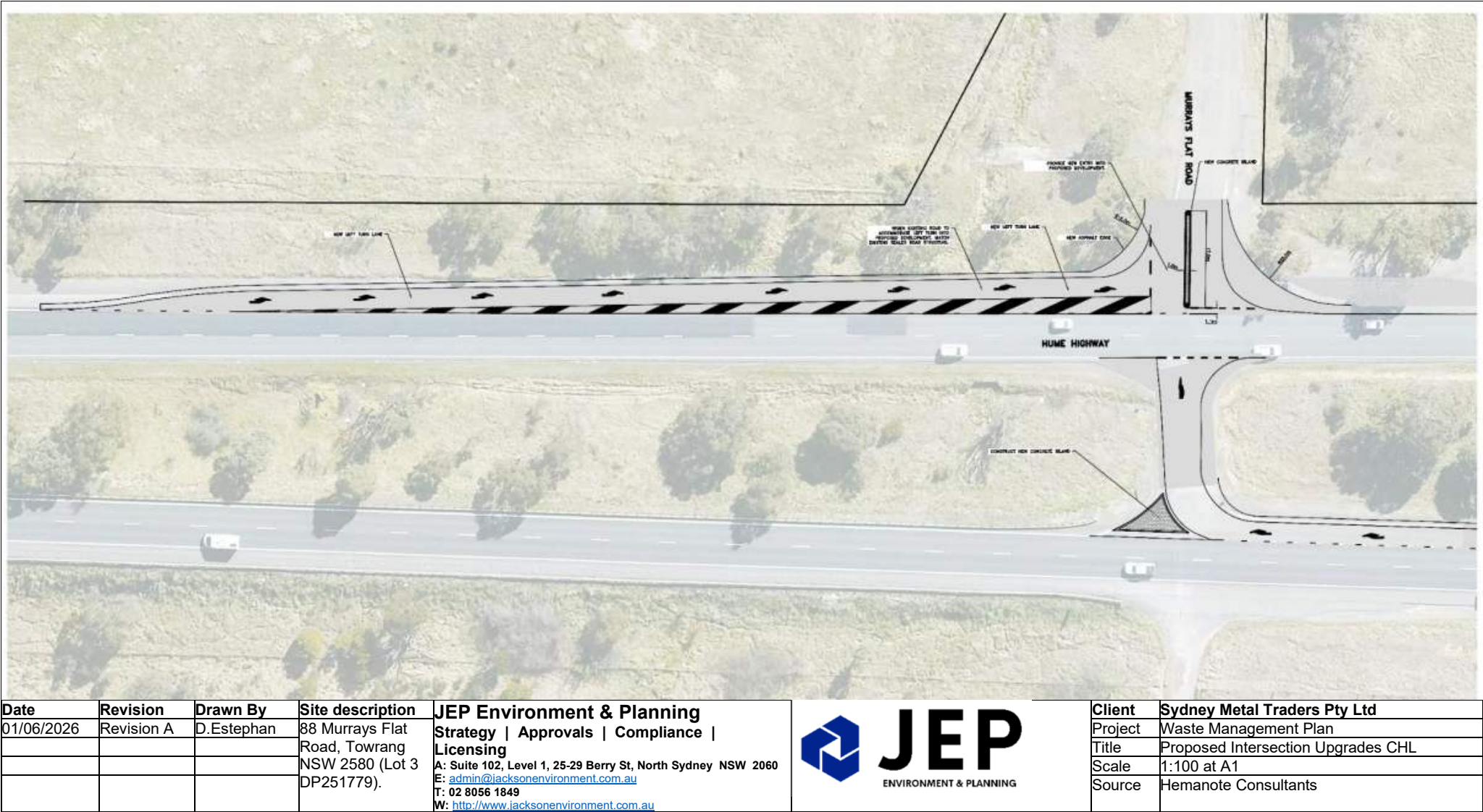


Figure 1.5 Proposed Intersection Upgrades (CHR).



Date	Revision	Drawn By	Site description	JEP Environment & Planning Strategy Approvals Compliance Licensing A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au		Client	Sydney Metal Traders Pty Ltd
01/06/2026	Revision A	D.Estephan	88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779).			Project	Waste Management Plan
						Title	Proposed Intersection Upgrades CHR
						Scale	1:100 at A1
						Source	Hemanote Consultants

1.6. Key contacts details

Table 1.1 lists the key contacts for the Facility.

Table 1.1. Sydney Metal Traders Contact Details.

Location / Personnel	Contact Details
Sydney Metal Traders	0433 190 056
Customer Inquiries	0433 190 056
Emergency Spills Response	0433 190 056
Complaints and Feedback	0433 190 056

Table 1.2 lists the contact details for the regulatory authorities that have an interest in the operations of the Development.

Table 1.2. Regulatory Authority Contact List.

Regulatory Authority	Contact Details
Council	
Goulburn Mulwaree Council	02 4823 4444 council@goulburn.nsw.gov.au
SafeWork NSW	
Incident notification	13 10 50
NSW Health	
Contact	13 77 88
Emergency Services	
Fire and Rescue NSW Goulburn Fire Station Crookwell Fire Station	02 4824 7205 02 4824 7271
NSW Police and / or NSW Ambulance Service	000

1.7. Site Processes

The Site will receive up to 30,000 tonnes per year of scrap metal for sorting and processing. All incoming vehicles will first pass over the inbound weighbridge located at the entrance to the Site. This weighbridge is positioned prior to the main operational area to ensure all loads are recorded before proceeding further. Once weighed, vehicles will move to the gatehouse, where loads will be visually assessed and directed to the appropriate unloading area depending on the type and source of material.

Upon entry into the operational area, vehicles will be directed to one of several designated unloading zones:

- Depollution Bay: A sealed and bunded area for end-of-life vehicles (ELVs), where fluids, batteries, and other hazardous components are safely removed prior to further processing.

- **Ferrous and Non-Ferrous Zones:** Areas allocated for the unloading of bulk commercial scrap metal, including steel, aluminium, copper, and other materials.

A series of mechanical processes are carried out on-site to prepare materials for shredding and maximise resource recovery:

- **Oxy-Cutting:** Oversized and heavy ferrous materials that cannot be processed by the shear are manually cut down to size using oxy-cutting equipment. These materials are then either processed through the shear or stockpiled within the cutting area.
- **Stationary Shearing:** Large ferrous items such as beams, plate steel, and fabricated sections are processed using a stationary shear. The shear reduces the materials to transportable lengths suitable for either direct sale or further shredding. A dedicated stockpile area adjacent to the shear is used to store pre-processed materials.
- **Pre-Shredding:** Materials such as car bodies are introduced into a pre-shredder prior to being processed by the hammermill. The pre-shredder homogenises the feedstock, detects unshreddable or explosive items (e.g., gas bottles), and reduces noise and vibration during hammermill operation. Materials from the pre-shredder are transferred via conveyor to the main shredder.
- **Shredder/Hammermill:** Materials are processed through a hammermill either directly from stockpile or after pre-shredding. The shredder reduces scrap metal into smaller, manageable pieces, lowering storage volume and transport requirements. Outputs from this process include fragmented ferrous and non-ferrous metals, as well as non-metallic residue (floc).
- **Downstream Separation:** The output from the shredder is conveyed to a downstream plant, beginning with a drum magnet that extracts ferrous metals. These are conveyed to a picking station for manual sorting, then stockpiled in dedicated bays. Non-ferrous metals and floc are directed to an Eddy Current Separator (ECS), where non-ferrous metals are separated from light fractions such as plastic, foam, and soil. Recovered non-ferrous metals are stored in covered bunker bins.

Floc Management: Floc, which makes up approximately 20 to 30% of the processed output by weight, is conveyed to a covered and bunded containment bay to prevent discharge of contaminants into the Site's stormwater system. This material will be regularly transported off-site to a licensed waste facility for appropriate disposal or recovery. Refer 1.4 for process flow chart for the processing of scrap metals.

1.7.1. Plant and Equipment

The proposed development will utilise a range of stationary and mobile plant to support the metal recycling operations. The core processing line will include a pre-shredder, hammermill shredder, metal shear, eddy current separator, and oxy torch to undertake the mechanical and thermal reduction and separation of scrap metals. Material handling will be supported by two material handlers (30 tonne and 50 tonne), front-end loaders, and forklifts operating on hardstand surfaces to facilitate the movement of materials between processing stages.

In addition, semi-trailers and other heavy vehicles (maximum 20 m) will be used for the delivery and export of materials. AC units will also be installed to support temperature control and ventilation within enclosed structures. Plant and equipment have been selected to ensure the safe, efficient, and environmentally responsible operation of the facility, in line with best practice for scrap metal processing facilities.

During the construction phase, the site will be equipped with a range of standard civil and industrial construction machinery suitable for bulk earthworks, foundation preparation, and installation of site infrastructure. Equipment is expected to include excavators, bulldozers, graders, front-end loaders, rollers, concrete mixers, water carts, and mobile cranes. Temporary generators, lighting towers, and construction vehicles such as tipper trucks and flatbeds will also be utilised for material delivery and on-site movement.

1.7.2. Process Description

The proposed development will involve the receipt, size reduction, shredding and separation of ferrous and non-ferrous scrap metal, including car bodies, whitegoods, and structural steel. Materials will be processed through a series of mechanical treatments designed to reduce volume, improve sorting efficiency, and prepare outputs for transport and recycling. Heavy gauge steel that cannot be processed by the shear such as beams, large plate, or structural components will be downsized using oxy-cutting. This process involves heating the steel with a torch to

enable manual cutting into manageable sections. Cut pieces will either be stored temporarily in the oxy-cutting stockpile area or directed to the stationary shear for further processing.

The stationary shear will cut bulky ferrous scrap into transportable lengths suitable for steel mill delivery. It will also process materials unsuitable for shredding due to shape, density, or composition. These items will be stockpiled adjacent to the shear. Vehicles, metal appliances, and general light scrap will be fed into a pre-shredder. This equipment reduces the size of incoming material, removes potential contaminants, and creates a uniform feedstock for the main shredder. The pre-shredder improves operational safety by identifying potentially explosive or unshreddable materials (e.g. gas bottles) and reduces the energy load, vibration, and wear on the primary shredder.

Once pre-shredded, material is transferred by conveyor into the hammermill shredder. The shredder fragments the metal into smaller pieces using a rotating hammer mechanism. This reduction in size facilitates storage, increases load efficiency for transport, and aids in the downstream separation of materials. Material discharged from the shredder enters a separation system comprising a drum magnet and picking line. Ferrous metals are magnetically extracted and manually sorted before being placed into stockpiles. The shredder, magnetic separator, and conveyors are covered where practicable to reduce emissions and minimise the need for water-based dust suppression.

Non-ferrous metals and mixed residue (floc) are directed to the downstream recovery plant, where an Eddy Current Separator (ECS) is used to extract non-ferrous metals. These metals are automatically sorted based on magnetic induction and deposited into bunker bins for collection.

Remaining floc material typically consisting of dirt, plastics, glass, rubber, and small metal fragments is conveyed to a covered and bunded storage area. This floc makes up approximately 20–30% of the total input by weight and will be regularly removed from Site and sent to a licensed waste facility. The design of this area prevents discharge of contaminants such as oil and grease into the site's stormwater system. A process flow diagram for Site operations is presented in Figure 1.4.

1.7.3. Storage and Metal stockpile areas

The shredded materials will then be stored for loading and transportation to offsite recycling and manufacturing into new metal products. The non-metal residue (floc) is separated from the non-ferrous metals. Non-Ferrous metals are stored in a covered bay and the floc will be stored in a covered floc bay.

The site layout is divided into distinct operational zones to manage the receipt, processing, and storage of different metal waste streams. The Unprocessed Metal Zones (Areas 1 and 2) are designed for the storage of small-sized/undersized and large-sized/oversized scrap metal prior to processing, with each pad accommodating a maximum pile size of 1,600 m³.

The Processing Zones include the fixed shearer and shredding areas, represented by the pink curved stockpile pads, which are used to store sheared or shredded ferrous material prior to recovery. Adjacent to these are the Processed Metal Recovery Bases, which comprise six dedicated bays for specific recovered material types, including stainless steel (SUS), copper and aluminium (Cu/Al), wire, 15–120 mm plastic, ferrous iron (Fe iron), and floc/fluff.

These recovery bays are located within the shredder building and are designed for smaller, high-value or specific waste streams, each with a maximum volume of 10 m³. Based on the calculated stockpile capacities, the total maximum volume of metals that can be stored on site at any point in time is 16,580 m³ and the maximum tonnage of metals that can be stored at any point in time is 14,354 tonnes.

1.7.4. Operating Hours

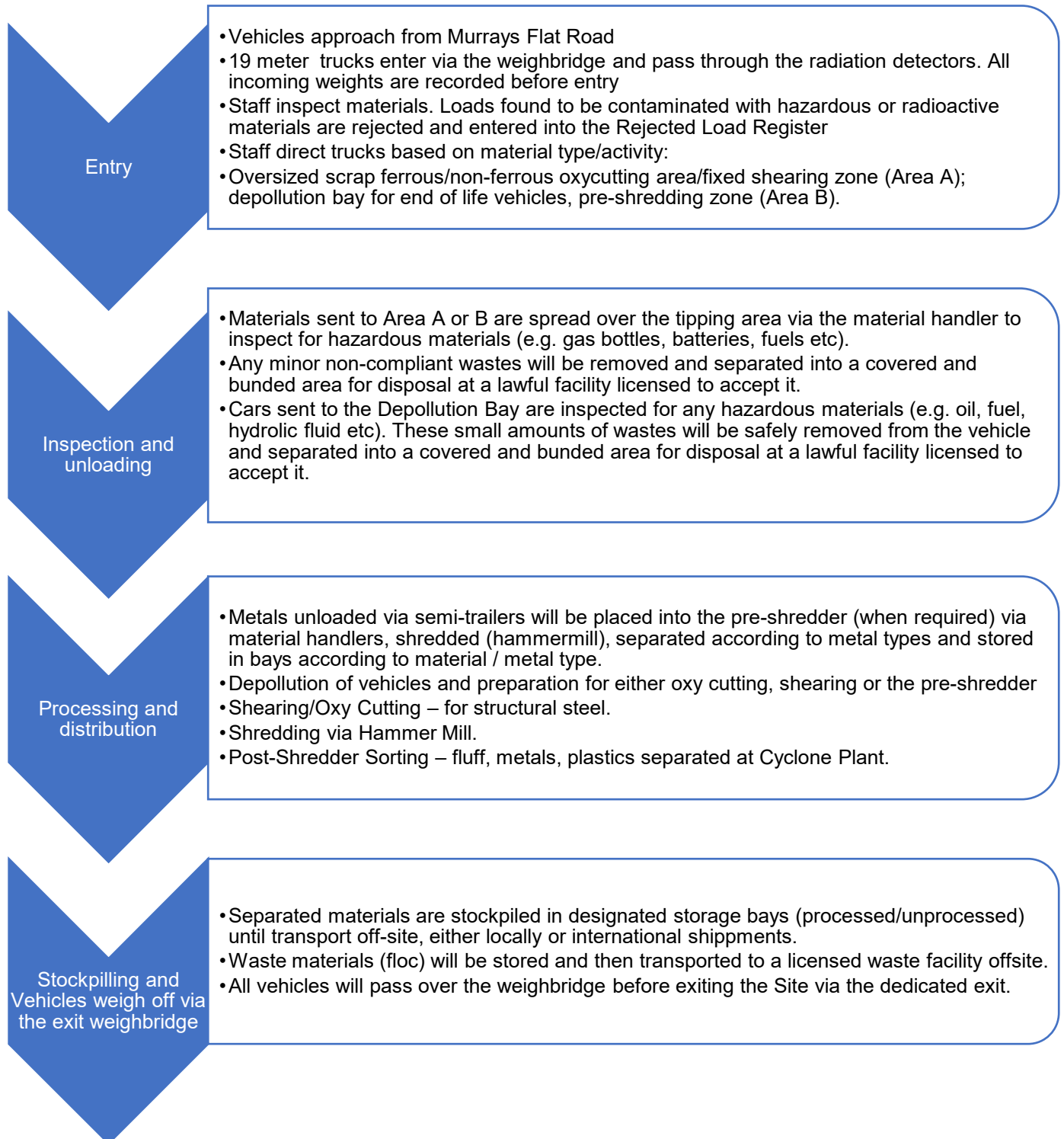
The proposed Site operations hours are:

- Monday to Friday between 6am – 6pm; and
- Saturdays from 7am – 4:30pm.

No operations are to occur on site on Sunday and public holidays. No operation of the hammermill shredder and pre-shredder will occur during the morning shoulder period 6am-7am. Operations during this time include inbound and outbound truck movements, material handlers, and maintenance of plant and equipment. While maintenance and cleaning activities can occur at any time of the day (24 hours), to maintain the efficiency of operations, they will occur predominantly during:

- Monday to Saturday between 6am – 6pm; and
- Sundays on a 24-hour basis.

Figure 1.4. Process flow diagram for Site operations.



1.8. Quantities of waste materials to be received

The waste materials to be accepted and recycled at the Site are given in Table 2.1. The waste classification of each material under the NSW EPA's Waste Classification Guidelines (2014) is General Solid Waste (Non-putrescible).

The Facility will receive up to 30,000 tonnes per annum of scrap metals, with daily throughputs below 150 tonnes, comprising predominantly ferrous and a smaller fraction of non-ferrous grades (aluminium, copper, stainless steel, lead, zinc, tin, sheet metals, batteries and motors). Of the material received, process yields indicate around 18,000 t/yr will be recovered as ferrous product (approximately 60%), 4,000 t/yr as non-ferrous product (13.33%), and 8,000 t/yr (about 20–30% by weight).

All incoming loads are measured on the inbound weighbridge, and on-site storage is managed within a maximum concurrent holding capacity of 14,354 tonnes across designated pads and recovery bays to maintain safe and compliant operations.

Storage locations and storage capacity of received, processed and stored metals are provided in detail in the Waste Management Plan (Appendix 11, Section 3.3.2).

The estimated output materials from the shredding and separation processing of scrap metals is summarised in Table 1.3. The overall recycling rate of the scrap metal received is estimated at 74%. However, further recycling at offsite facilities licensed to accept the floc material may provide further opportunities for recovery.

Table 1.3. Summary estimate of export forecasts of shredded scrap metal and residuals. Actual may vary.

Export material	Annual Tonnes	Destination	Overall Estimated Percentage
Ferrous metals	18,000	International shipment and/or local destinations.	60%
Non-ferrous metals	4,000	Local destinations.	13.33%
Floc	8,000	Eastern Creek Resource Recovery Park	26.67%

1.9. Infrastructure

The key infrastructure at the Facility is summarised in Table 1.4.

Table 1.4. Key Infrastructure at the Facility.

Infrastructure	Description
Workshop and Amenities	A fully enclosed structure approximately 480 m ² , housing equipment storage, staff facilities, toilets, showers, and break rooms. It supports maintenance and servicing of vehicles and equipment onsite.
Gatehouse	A small 60 m ² building located at the site entrance, serving as a security checkpoint and entry management area. Includes a small internal office area for staff oversight.
Offices	Integrated with the gatehouse and weighbridge, offices are used for administrative functions including site operations, record keeping, and staff coordination.
Access	Site access is via Murrays Flat Road, with an upgraded sealed driveway designed to accommodate B-double vehicles. Entry and exit points allow for one-way internal traffic flow.
Weighbridge and office	Located adjacent to the gatehouse, the 8x2 m weighbridge includes an operator's office used for vehicle check-in/out and load documentation.
Car parking	A dedicated area with 18 sealed car spaces, including staff and visitor parking, situated near the gatehouse for convenient access.
Shredding plant and equipment	Comprising a hammermill, cyclone plant, and control room (241 m ²), the shredding plant processes ferrous and non-ferrous metals. Enclosed structures and operational controls are included to manage noise, dust, and emissions.
Depollution Shed	A purpose-built enclosed facility located within the End-of-Life Vehicle (ELV) Processing Area, designed for the safe removal of hazardous fluids and components from vehicles prior to shredding. The shed includes a bunded concrete floor, drainage controls, and designated storage areas for fuel, oil, coolant, batteries, and other hazardous materials.

2. Environmental Management Framework

2.1. Development Consent

The facility will be operated in accordance with this Operational Environmental Management Plan and the conditions of development consent.

2.2. Legal Requirements

This section applies to activities which Sydney Metal Traders can be held responsible and includes:

- Requirements stipulated in legislation, including regulatory requirements, codes of practice and industry standards at a National, State and Local government level;
- Requirements stipulated in company standards; and
- Other environmental requirements as required generally.

Management shall also access and review appropriate sources of information (at least annually) and identify significant changes in legal requirements related to environmental aspects. These sources of information may include:

- Lawlex Legislation Service;
- Publications relevant to the scrap metal industry;
- Environment Manager Magazine;
- NSW EPA news bulletins;
- Department of Planning, Industry and Environment publications; and
- Direct notification by Commonwealth and State Government Departments.

Management shall maintain summaries of legal requirements related to the operations and environmental aspects. Such summaries shall be updated at least every 12 months by a competent person.

Table 2.1 Legal Requirements.

Legislation	Associated regulations	General intent	Relevance to the Facility
<i>Protection of the Environment Operations Act 1997</i>	<i>Protection of the Environment Operations (General) Regulation 2022</i> <i>Protection of the Environment Operations (Clean Air) Regulation 2022</i> <i>Protection of the Environment Operations (Noise Control) Regulation 2017</i> <i>Protection of the Environment Operations (Waste) Regulation 2014</i>	To enhance the quality of the environment in NSW.	Outlines requirements for a range of activities related to waste facilities including licensing, monitoring and reporting and Resource Recovery Orders and Exemptions
<i>Waste Avoidance and Resource Recovery Act 2001</i>		Minimise the consumption of natural resources and the final disposal of waste and achieve integrated waste	The operation of the Facility must uphold principles of ecologically sustainable development and focus on waste minimisation

Legislation	Associated regulations	General intent	Relevance to the Facility
		and resource management planning.	and resource recovery over disposal.
Environmental Planning and Assessment Act 1979	<i>Environmental Planning and Assessment Regulation 2021</i>	Encourage the proper management, development and conservation of natural and artificial resources and protection of the environment.	Determines the development approval process.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Clause 2.152(1) of the Infrastructure SEPP states the following: <i>Development for the purpose of waste or resource management facilities, other than development referred to in subclause (2), may be carried out by any person with consent on land in a prescribed zone.</i> <i>prescribed zone means any of the following land use zones or a land use zone that is equivalent to any of those zones—</i> <i>(b1) E4 General Industrial.</i>	The aim of the <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (Infrastructure SEPP) is to facilitate the effective delivery of infrastructure across NSW by improving regulatory certainty and efficiency through a consistent planning regime for infrastructure and the provision of services, and by providing greater flexibility in the location of infrastructure and service facilities.	The proposed development meets the definition of a “Resource recovery facility” or a “Waste or resource transfer station” under Section 2.151 of the Infrastructure SEPP. Therefore, the proposed development is permissible with consent in E4 General Industrial zonings under 2.152(1) of the Infrastructure SEPP.
Work Health and Safety Act 2011	<i>Work Health and Safety Regulation 2011</i>	To secure and promote the health, safety and welfare of people at work.	The operations must provide a safe work environment.
Environmentally Hazardous Chemicals Act 1985	<i>Environmentally Hazardous Chemicals Regulation 2008</i>	Control of activities related to chemical waste.	Influences waste permissibility.
Public Health Act 2010	-	To increase the standard of health in NSW.	Outlines requirements for safe drinking water.
Water Management Act 2000	-	To protect, enhance and restore water, associated ecosystems and water quality.	Effects of the facility and waste operations must be managed.

2.3. Inductions and Training

Sydney Metal Traders management will ensure that all employees and contractors involved with the operations of the Facility are suitably inducted and trained prior to commencing any work on site. Training in relation to environmental responsibilities and implementation of this OEMP will take place initially through a site induction and then on an on-going basis through “toolbox talks” (or similar). Further details are provided in Section 7.2.

The topics to be covered during the induction and toolbox talks include:

- General site maintenance and management expectations and requirements;
- Traffic management;
- Familiarisation with site environmental management and mitigation measures in this OEMP;

- The environmental management commitments and responsibilities in this OEMP;
- Waste avoidance and management strategies;
- Appropriate response and management of complaints received from the public, government agencies or other stakeholders in accordance with the protocol detailed in Section 7.3; and
- Appropriate response and management of environmental incidents in accordance with the strategy detailed in Section 6.

Records of all inductions and training undertaken will be recorded in a Training Register.

2.4. Sydney Metal Traders Environmental Policy

ENVIRONMENTAL POLICY	
Sydney Metal Traders pursues 'best practice' in all its activities, to that end, we strive to operate and manage our business such that the following environmental principals/goals are met and exceeded:	
Environment	Committed to protecting and enhancing the environment through rigour in environmental management
Compliance	Recognise the importance and relevance of compliance with all relevant policy and regulation
Monitoring	Appropriate monitoring of systems/procedures and progress with an inbuilt review process
Continuous Improvement	A commitment to continuous improvement to ensure that best practice is pursued and achieved
Extended Producer Responsibility	Heightened awareness and commitment to Extended Producer Responsibility to ensure that the supply chain is sustainable
Education	A comprehensive education and training schedule are maintained so that employees and management are in tune with latest trends and practice, creating awareness and pride in the workplace.
Hazards	Monitoring and management of hazards to ensure minimal environmental impact and disturbance
Landfill	Minimising waste to landfill is our priority.

3. Environmental Aspect and Impacts

The key environmental aspects and associated impacts of the Facility, Environmental Impact Statement (EIS), and which are covered by this OEMP include:

- Traffic and access;
- Air quality;
- Noise and vibration;
- Stormwater;
- Non-conforming waste
- Waste management; and
- Fire.

The key environmental aspects and associated impacts of the Facility are summarised below.

3.1. Traffic and Access

During operation, the proposed scrap metal recycling facility is expected to process up to 30,000 tonnes of unprocessed scrap metal annually. Based on the operational characteristics of the existing Port Kembla Metal Recyclers facility, the Site is anticipated to handle approximately 577 tonnes of material per operating week. Unprocessed material will be delivered to the Site from the southern region using tipper trucks and semi-trailers. Approximately 75% of the processed material will be transported to the Port Kembla Metal Recyclers facility, while the remaining 25% of residual waste material will be transported to landfill sites in the northern region using purpose-built semi-trailers.

The facility will not be open to the general public, with all vehicle movements limited to authorised personnel, contractors, and approved heavy vehicle operators. Staff travel is assumed to be evenly distributed between northern and southern origins. Estimated peak hour traffic generation associated with the development is relatively low, comprising approximately 26 vehicle trips during both the AM and PM peak periods. This includes 19 inbound and 7 outbound vehicle trips during the morning peak, and 7 inbound and 19 outbound vehicle trips during the afternoon peak. These traffic volumes are considered low impact and are not expected to significantly affect existing traffic flows on Murrays Flat Road or the surrounding road network.

The Proposal incorporates dedicated vehicle routing arrangements and intersection controls designed to improve safety at the Hume Highway / Murrays Flat Road intersection. All vehicles exiting the Site are required to undertake left-turn movements onto the Hume Highway. Articulated vehicles accessing the Site from the north are prohibited from turning right into Murrays Flat Road from the Hume Highway and must instead continue to the Hume Highway / Hume Street roundabout to undertake a U-turn before approaching the Site from the eastbound direction via the upgraded channelised left-turn lane (CHL). Passenger vehicles and small to medium heavy vehicles travelling southbound towards Goulburn are required to utilise Carrick Road to undertake a turning manoeuvre prior to rejoining the Hume Highway.

Detailed SIDRA (Version 9.1) modelling was undertaken to assess the operational performance of the Hume Highway / Murrays Flat Road intersection under both existing (2025) and future (2035) traffic conditions. The modelling incorporated the proposed intersection upgrade works, including a channelised left-turn lane (CHL), channelised right-turn lane (CHR), and restrictions on unsafe turning movements. The assessment concluded that the intersection will continue to operate at acceptable Levels of Service (LOS) under both current and future scenarios. The only notable change identified is a minor reduction in performance from LOS 'A' to LOS 'B' for one turning movement during the PM peak period, with average vehicle delays remaining within acceptable operational limits.

Vehicular access to the Site will be provided via four driveways from Murrays Flat Road, including separate access arrangements for operational trucks and staff/visitor vehicles. The northern truck access driveway will operate as a combined entry and exit point and has a width of 22 metres, while the southern driveway will operate as a truck exit-only driveway with a width of 20 metres. Staff and visitor access will be provided via widened driveways designed in

accordance with AS2890.1:2004 and AS2890.2:2018, including compliant sight distances and provision for forward entry and exit movements.

The development provides a total of 18 on-site car parking spaces, including 13 staff parking spaces and 5 spaces located adjacent to the administration office for staff and visitor use, including one accessible parking space. Internal circulation has been designed to provide safe and efficient vehicle manoeuvring, with one-way truck circulation, line marking, signage, and separate light vehicle and heavy vehicle movement areas to minimise conflict points. Swept path analysis undertaken for AV, HRV, MRV, SRV, B99 and B85 vehicle types confirms that the Site can safely accommodate the proposed operational vehicles in accordance with AS2890 requirements.

Overall, the operational traffic impacts associated with the Proposal are expected to be low and can be appropriately managed through the implementation of the proposed vehicle routing arrangements, intersection upgrades, dedicated access design, and internal circulation measures.

Mitigation measures will be implemented to minimise impacts, refer section 4.2 of this document and Attachment 1.

3.2. Air Quality

The air quality assessment for the Proposal identified potential impacts during construction and operation, along with consideration of cumulative impacts from surrounding land uses. The locality is predominantly rural with few industrial sources, and analysis of surrounding licensed facilities indicated a low likelihood of cumulative air quality impacts. Notably, Divall's Quarry, located approximately 4.1 km east, was the only facility with a potentially comparable emissions profile, and its distance and separation reduce the risk of interaction.

Construction Phase

Construction works, particularly earthworks and general site development, are expected to produce short-term dust emissions in the form of fugitive particulate matter. A qualitative risk-based analysis concluded:

- Medium risk of dust soiling and low risk to human health from earthworks and construction;
- Low to negligible risks from track-out and construction traffic; and
- Negligible risk from demolition activities.

Given the setback distances to sensitive receptors and the short-term nature of construction, impacts are expected to be minimal with proper management. Mitigation measures from Appendix B (Table B10) of the AQIA will be incorporated into the Construction Environmental Management Plan (CEMP) to minimise emissions.

Operational Phase

Operational activities such as metal shredding, shearing, and materials handling pose ongoing air quality risks, including emissions of TSP, PM₁₀, PM_{2.5}, metals, NO₂, and odour. To address these, a suite of embedded controls has been incorporated into facility design and operation, including:

- Dust-Buster foam dust suppression on shredders (85% efficiency);
- Water sprays during unloading and transfers (50–70%);
- Operational enclosures and awnings for processing equipment (70%);
- Controlled crushing/screening operations (up to 91.2%);
- Wind shielding, drop height control, and material enclosures; and
- Paved haul routes, road flushing, and vehicle speed limits (30–70% efficiency).

Modelling confirmed that emissions under worst-case conditions remain well within the NSW EPA air quality impact assessment criteria:

- PM₁₀ and PM_{2.5} cumulative levels do not exceed daily or annual limits;
- Dust deposition remains below 4 g/m²/month; and
- Metals and NO₂ concentrations are significantly below health thresholds.

The operational air emissions, including metals like copper, manganese, iron oxide fumes, and chromium VI, pose negligible risk to human health or the environment.

Odour emissions may result from oxy-acetylene cutting and hammermill shredding of coated or contaminated scrap. Despite the potential for VOCs and odorous compounds, modelling shows ground-level odour concentrations of 1.0 odour unit, well below the NSW EPA rural criterion of 6.0 odour units. Odour impacts are therefore expected to be negligible.

Mitigation measures will be implemented to minimise any residual impacts, and all controls are detailed in the Section 4.3 of this document and Attachment 2.

3.3. Noise

Noise impacts associated with the development have been assessed across operational, construction, and traffic-related phases using industry-standard modelling and conservative assumptions to reflect realistic worst-case scenarios. RWDI conducted the assessments using CadnaA v2025 software and the CONCAWE algorithm, applying worst-case meteorological and acoustic conditions.

Operational Noise

The operational phase includes the use of major equipment such as a pre-shredder, hammermill shredder, oxy-acetylene cutters, shears, forklifts, and a downstream separation plant. Heavy vehicle movements and rooftop mechanical units were also incorporated into the model.

Most sensitive residential and industrial receivers comply with Project Noise Trigger Levels (PNTLs). However, Receiver R02 is predicted to experience:

- A +6 dB exceedance during daytime operations; and
- A +3 dB exceedance during the morning shoulder period.

These exceedances are primarily attributed to the hammermill shredder and B-double truck movements. To mitigate these impacts, the proposal includes a 4-metre high noise barrier at the northern boundary of the cyclone plant and shredder, designed to reduce noise levels at R02 to comply with PNTLs (refer to Figure 6.2 in the NVIA).

Final plant specifications and noise characteristics (e.g. tonality or low-frequency components) are yet to be confirmed, and assumptions will be reviewed prior to commissioning. A Noise and Vibration Impact Assessment (NVIA) has been prepared to guide operational compliance.

Construction Noise

Construction noise is predicted to comply with noise management levels (NMLs) at most sensitive receivers during standard construction hours. Receivers R02 and R04, located 500 m and 350 m from the site respectively, may experience exceedances of up to 5 dB. No sensitive receiver is expected to experience noise levels above 75 dBA, the threshold for being considered “highly noise-affected.”

The modelling incorporated simultaneous operation of high-noise equipment, minimal shielding, and elevated work platforms. In practice, noise levels will vary and are expected to be lower during non-intensive phases.

Traffic Noise

Road traffic noise resulting from both operational and construction vehicle movements is expected to be negligible. The additional traffic on the Hume Highway up to six semi-trailers and four heavy vehicles daily, with no more than three movements in any peak hour represents a less than 2 dB increase in traffic noise.

As per the NSW Road Noise Policy (RNP 2011), changes below 2 dB are considered barely perceptible and not significant. Therefore, no measurable impact on residential amenity from road traffic noise is anticipated.

Vibration

The NVIA confirms that no vibration-intensive activities are proposed during any project phase. Given the large offset distances to nearby sensitive receptors, any minor vibration that may occur is expected to be imperceptible.

Mitigation measures will be implemented to minimise noise-related impacts, with ongoing compliance managed through the Noise and Vibration Impact Assessment, refer to section 4.4 and attachment 3.

3.4. Stormwater

The operation of the proposed metal recycling facility is expected to alter the existing stormwater regime primarily due to the replacement of pasture and grassed areas with hardstand surfaces and building footprints, which will increase the site's impervious area. This change will likely result in greater volumes and velocities of stormwater runoff, potentially contributing to localised erosion, reduced infiltration capacity, and altered surface flow paths across the site.

In addition, routine operational activities such as vehicle movements, external materials handling, and metal processing are expected to generate pollutants including hydrocarbons, heavy metals, suspended solids, and nutrients, which may become entrained in surface runoff. Without appropriate controls, these pollutants pose a risk to on-site drainage systems, internal dams, and the broader downstream environment, particularly the Wollondilly River located approximately 800 metres north of the site, which forms part of the Sydney Drinking Water Catchment.

Stormwater Management Measures

To mitigate these impacts, a comprehensive stormwater management system has been integrated into the site design:

- Impermeable Lining: A geosynthetic clay liner and LLDPE geomembrane underlay the recycling and internal roadway precincts to prevent groundwater infiltration;
- Three Fully Lined Sedimentation Basins: Each basin captures and settles runoff from separate sub-catchments before directing it to an end-of-line treatment system; and
- Biofiltration Raingarden System: A 1,000 m² vegetated biofiltration unit with specific hydraulic and nutrient properties is used to polish stormwater before final discharge. This includes:
 - 300 mm extended detention zone;
 - 800 mm filter media depth;
 - 200 mm drainage layer;
 - Underdrain network and rock mulch surface; and
 - Stabilised outlet to on-site dam.

Water Reuse Benefits

Stormwater from the basins will be reused for operational purposes (e.g. dust suppression). Modelling confirms high reuse capability:

- Basin #1: 99.92% of reuse demand;
- Basin #2: 97.23%;
- Basin #3: 99.50%; and
- 150,000L tank: 92.33%.

Neutral or Beneficial Effect (NorBE) Outcome

A NorBE assessment was undertaken per WaterNSW guidelines and demonstrated that:

- The proposed system achieves >10% reduction in key pollutants (suspended solids, phosphorus, nitrogen)'
- Cumulative frequency charts confirm compliance with NorBE across 50th–98th percentile events; and
- Therefore, the development is expected to have no net negative impact on downstream water quality.

Maintenance and Monitoring

To ensure the long-term performance of stormwater infrastructure:

- An Operational Environmental Management Plan (OEMP) will guide regular maintenance, vegetation control, and inspection of stormwater quality improvement devices (SQIDs) including the raingarden; and

- A Construction Soil and Water Management Plan (SWMP) in the WCMS outlines temporary sediment and erosion controls during construction, in accordance with Landcom (2004).

For mitigation measures refer to section 4.5 of this document and attachment 5.

3.5. Pollution incident

Emergencies or incidents which are considered not likely, but have the potential, to cause or threaten material harm to the environment include:

- Workplace health and safety;
- On-site spills or leaks;
- Off-site discharges;
- Hazardous materials/dangerous goods;
- Fire; and
- Road incidents.

3.6. Fire

A Fire Safety Study (FSS) has been prepared for the Proposal in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper (HIPAP) No. 2 – *Fire Safety Study Guidelines and the NSW Fire and Rescue (FRNSW) guideline Fire Safety in Waste Facilities* (2020). The assessment identified potential fire hazards across site operations, including ignition of combustible material within stockpiles, ignition of shredder floc, waste handling during shredding, diesel storage, and the potential for contaminated firewater discharge. While most scrap metals are inherently non-combustible, residual materials such as plastics, rubber, and batteries present within appliances and shredder residue were identified as potential ignition sources.

The study determined that risks can be effectively managed through the adoption of prevention, detection, protection, and mitigation measures. Fire prevention controls include separation of stockpiles, implementation of a hot works permit system, designated smoking areas, and strict housekeeping practices. Detection measures, such as thermal monitoring of stockpiles when the site is unattended, are recommended to ensure early identification of ignition events. Fire protection infrastructure will include hydrant coverage designed in accordance with AS 2419.1, hose reels, and portable fire extinguishers, with additional dry powder extinguishers to be provided adjacent to waste storages. Staff will also be trained in the safe use of firefighting equipment.

Firefighting water supply has been assessed as requiring a minimum of 288 m³, with dedicated storage tanks to maintain four hours of hydrant operation. To prevent environmental harm from contaminated firewater runoff, the stormwater retention dam has been designed to exceed this capacity, with isolation valves enabling containment, testing, and treatment prior to controlled release. Access and egress for fire brigade response has been incorporated into the site layout, with modelling indicating initial firefighting intervention could be achieved within approximately 14 minutes of ignition.

Overall, the FSS concluded that the design and proposed controls are adequate to mitigate fire risk to an acceptable level, subject to implementation of the recommended measures. Refer to section 4.7 of this document and attachment 7.

3.7. Waste Management

The Facility will receive, sort, cut, shred and separate ferrous and non-ferrous scrap metals, with an annual capacity of up to 30,000 tonnes. Processed metals will be transferred off-site for sale to domestic and export markets.

Construction will be undertaken in stages and will include site preparation, installation of hardstand areas, drainage works, sediment basins, biofiltration basin, and office conversion. Waste will be separated on-site into soil, metals, construction materials and recyclables, with disposal to licensed facilities. Recycling during construction is expected to exceed 99%.

During operations, incoming loads will be weighed, inspected and directed to designated processing areas. Scrap metal will be processed via shearing, pre-shredding, shredding and separation, maximising recovery of ferrous and non-ferrous metals. Residual floc (20–30% by weight) will be stored in a covered, bunded bay prior to off-site disposal at a licensed facility. Annual outputs are estimated at 18,000 tonnes of ferrous metals, 4,000 tonnes of non-ferrous metals, and 8,000 tonnes of residual waste.

Environmental controls include sealed surfaces, stormwater capture and treatment, spill response, regular inspections, and compliance with EPA licensing requirements. Office operations will maintain a co-mingled recycling system with an estimated 88% recovery rate. Refer To section 4.8 of this document and attachment 8.

4. Environmental Management Measures

A suite of development design, best management practices and mitigation measures have been committed to minimise the potential for adverse impact on the local environment and surrounding community. The environmental mitigation and management measures relevant to the Facility are provided in the following sections.

4.1. General

Table 4.1 outlines the general environmental management and mitigation measures that will be implemented at the Facility to minimise the potential for adverse impacts on the local environment and surrounding receptors.

Table 4.1. General Management and Mitigation Measures.

Mitigation Measures	Responsibility	Timing / Frequency
The Facility will implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the Facility	Site Management	On-going
Fires will be extinguished promptly	Operations Management	On-going
Adequate fire fire-fighting capacity will be maintained on site	Site Management	On-going
The perimeter fence and security gates will be maintained and locked at all times when the site is unattended	Site Management	On-going
Employees and contractors will be suitably inducted and trained prior to commencing any work on site	Site Management	Inductions prior to commencing employment / contract. As needed toolbox talks.
Contact details will be displayed on signage at the entrance to the site	Site Management	On-going
All plant and equipment used for the Facility will be maintained in a proper and efficient condition and operated in a proper and efficient manner	Site Management	On-going
Sydney Metal Traders will repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the Development	Site Management	On-going

4.2. Traffic and Access

To support the proposed development and ensure safe and efficient integration with the surrounding road network, a suite of intersection and access upgrades are proposed. These mitigation measures have been designed in accordance with undertaken in accordance with Austroads Guide to Traffic Management Part 6: Intersections, Interchanges and Crossings Management.

Table 4.2 lists the management and mitigation measures that will be implemented at the Facility to minimise the impacts of traffic and access.

Table 4.2. Traffic and Access Mitigation Measures.

Mitigation Measures	Responsibility	Timing / Frequency
No right-turn access for semi-trailers from either direction will be permitted to ensure turning movements are limited to left-in/left-out only, further reducing safety risks at the highway interface.	Site Management	On-going
Driveway locations have been assessed for compliance with sight distance and proximity standards under AS2890.1:2004 and AS2890.2:2018.	Site Management	On-going
Dedicated entry and exit driveways have been incorporated for heavy vehicles, with appropriate widths (22 m and 20 m respectively) and turning radii.	Site Management	On-going
CHL Lane: To be constructed at the northern intersection (for eastbound traffic).	Builder contractor	Construction phase prior to facility operations.
CHR Lane: To be constructed at the southern intersection (for westbound traffic).	Site Management Truck drivers	On-going
Right-turn movements from Murrays Flat Road onto the Hume Highway will be prohibited for all vehicles, along with U-turn movements for eastbound vehicles.	Builder contractor	Construction phase prior to facility operations.
Right-turn movements from the Hume Highway (westbound) into Murrays Flat Road will be retained, supported by a compliant deceleration lane.	Builder contractor	Construction phase prior to facility operations.
Articulated vehicles will not turn right from the Hume Highway into Murrays Flat Road and will instead utilise the Hume Highway / Hume Street roundabout to undertake a U-turn and approach from the eastbound direction.	Builder contractor	Construction phase prior to facility operations.
Extending the existing channelised right-turn lane from the Hume Highway (westbound) into Murrays Flat Road to 185 metres, in accordance with Austroads standards.	Builder contractor	Construction phase prior to facility operations.
Extending and upgrading the existing auxiliary left-turn lane from the Hume Highway (eastbound) into a channelised left-turn lane (CHL) of 185 metres, including chevron line marking for guidance.	Builder contractor	Construction phase prior to facility operations.
Installation of a median island to guide traffic and prevent right-turn movements from Murrays Flat Road (towards the west).	Builder contractor	Construction phase prior to facility operations.
Construction of a 1.0-metre-wide median island on Murrays Flat Road, offset by 1.0 metre from the Hume Highway, to separate inbound and outbound traffic and provide safe clearance.	Builder contractor	Construction phase prior to facility operations.
Installation of regulatory signage and line marking to prohibit right-turn movements from Murrays Flat Road and guide vehicle movements.	Builder contractor	Construction phase prior to facility operations.

4.3. Air Quality

The Proposal incorporates effective emission control measures, including dust suppression systems and operational enclosures, to ensure air quality impacts remain within acceptable limits. Based on the outcomes of the AQIA, there are no identified air quality constraints that would preclude the development. The site is considered suitable for the proposed use with appropriate mitigation measures in place. The mitigation measures are presented in Table 4.3.

Table 4.3. Air Quality Mitigation Measures.

Mitigation Measures	Responsibility	Timing / Frequency
Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.	Site Management	On-going
Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.	Site Management	On-going
Display the head or regional office contact information.	Site Management	On-going
Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the relevant regulatory bodies.	Site Management	On-going
Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.	Site Management	On-going
Make the complaints log available to Council and/or NSW EPA when asked.	Site Management	On-going
Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book.	Site Management	On-going
Conduct daily on-site and off-site inspections where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when requested.	Operational Management	On-going
Carry out regular site inspections to monitor compliance with the DMP / CEMP, record inspection results, and maintain an inspection log available to Council and/or NSW EPA when requested.	Operational Management	On-going
Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.	Operational Management	On-going
Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.	Site Management	On-going
Erect solid screens or barriers around dusty activities or the site boundary that they are at least as high as any stockpiles on site.	Site Management	On-going
Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.	Site Management	On-going
Avoid site runoff of water or mud.	Operational Management	On-going
Keep site fencing, barriers and scaffolding clean using wet methods.	Operational Management	On-going
Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below	Operational Management	On-going
Cover, seed or fence stockpiles to prevent wind erosion	Operational Management	On-going
Ensure all on-road vehicles comply with relevant vehicle emission standards, where applicable	Site Management	On-going
Ensure all vehicles switch off engines when stationary	Operational Management	On-going
Avoid the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment, where practicable	Operational Management	On-going

Mitigation Measures	Responsibility	Timing / Frequency
Impose and signpost a maximum-speed-limit of 25 km·h ⁻¹ on surfaced and 15 km·h ⁻¹ on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).	Site Management	On-going
Implement a Travel Plan that supports and encourages sustainable travel	Site Management	On-going
Only use cutting, grinding, or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems	Operational Management	On-going
Ensure an adequate water supply on the site for effective dust/particulate matter suppression/ mitigation, using non-potable water where possible and appropriate	Operational Management	On-going
Use enclosed chutes and conveyors and covered skips	Operational Management	On-going
Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate	Operational Management	On-going
Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.	Operational Management	On-going
Avoid bonfires and burning of waste materials.	Operational Management	On-going
Avoid scabbling (roughening of concrete surfaces) if possible.	Operational Management	On-going
Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.	Operational Management	On-going
Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.	Operational Management	On-going
For smaller supplies of fine powder materials ensure bags are sealed after use and stored appropriately to prevent dust	Operational Management	On-going
Use water-assisted dust sweeper(s) on the access and local roads to remove, as necessary, any material tracked out of the site.	Operational Management	On-going
Avoid dry sweeping of large areas.	Operational Management	On-going
Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.	Operational Management	On-going
Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	Operational Management	On-going
Record all inspections of haul routes and any subsequent action in a site logbook	Operational Management	On-going
Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.	Operational Management	On-going

Mitigation Measures	Responsibility	Timing / Frequency
Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).	Operational Management	On-going
Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permit.	Operational Management	On-going
Access gates to be located at least 10 m from receptors where possible.	Operational Management	On-going

4.4. Noise

The contribution of project-generated traffic to road traffic noise is predicted to be negligible, with modelling indicating an increase of less than 0.5 dB along the Hume Highway. This increment is considered imperceptible to the human ear and is not expected to result in any measurable reduction in residential amenity. On this basis, the proposed development is unlikely to generate significant noise or vibration impacts, provided that all reasonable and feasible mitigation measures recommended in the RWDI report are implemented. The mitigation measures are presented in Table 4.4.

Table 4.4. Noise Mitigation Measures.

Mitigation Measures	Responsibility	Timing / Frequency
Operate during approved hours	Operations Management	On-going
Undertake regular noise monitoring to determine the impact of operating plant on sensitive receivers	Operations Management	On-going
Appropriate training of onsite staff	Operations Management	On-going
Undertake community consultation and respond to complaints in accordance with established project procedures	Operations Management	On-going
Turning off machinery when not in use	Operations Management	On-going
Respite periods for pile drivers and rock breakers (if applicable)	Operations Management	On-going
Conducting regular maintenance of plant to ensure efficient and quiet operation	Operations Management	On-going
Portable temporary screens	Operations Management	On-going
Screen or enclosure for stationary equipment	Operations Management	On-going
Maximising offset distance between noisy plant items and sensitive receivers	Operations Management	On-going
Avoiding use of noisy plant simultaneously and/or close together near sensitive receivers	Operations Management	On-going
Orienting equipment away from sensitive receivers	Operations Management	On-going
Carrying out loading and unloading away from sensitive receivers	Operations Management	On-going
Using noise source controls such as residential-class mufflers on all plant and equipment	Operations Management	On-going

Mitigation Measures	Responsibility	Timing / Frequency
Selecting site access points and roads as far as reasonably practicable from sensitive receivers	Operations Management	On-going
Using non-noise-generating structures (e.g. site offices, storage sheds, stockpiles) as noise barriers	Operations Management	On-going
Reversing alarms to be avoided and squawkers used	Operations Management	On-going

4.5. Stormwater Management

The protection of stormwater quality improvement devices (SQIDs), particularly the proposed biofiltration raingarden, is critical to ensuring their long-term performance and safeguarding the investment in water quality improvements. These devices are vulnerable to physical and mechanical damage during the construction phase and must be carefully managed both during installation and throughout their operational life. To support their ongoing effectiveness, an Operational Environmental Management Plan (OEMP) will be prepared prior to practical completion. The OEMP will outline responsibilities and maintenance requirements for each device to ensure they function as intended.

The biofiltration system, shown conceptually on the Stormwater Drainage and Water Quality Management Site Plan (Ref 0060222-S101-A), should not be constructed until bulk earthworks, building construction, and hardstand areas are largely complete. Delaying installation until these stages are finished will reduce the risk of damage and prevent sediment-laden stormwater from entering the system prematurely. Once buildings are completed, the roof drainage connected to the rainwater tank, and hardstand areas installed, the raingarden can be constructed and planted. Vegetation establishment should occur as soon as practicable to ensure the system is operational without delay.

The effectiveness of the biofiltration raingarden is largely dependent on the quality of inflows. Allowing sediment or contaminated runoff to enter the filter media would undermine the design intent by clogging the system and reducing treatment performance. As such, temporary erosion and sediment control measures will be critical during construction to protect the device prior to commissioning. Long-term viability will be maintained through regular inspection, vegetation management, and adherence to the OEMP. Measures presented in Table 4.5 outline the specific design, construction, and operational safeguards to ensure the system continues to provide water quality benefits into the future.

Table 4.5. Stormwater management mitigation measures.

Mitigation Measures	Responsibility	Timing / Frequency
Check the condition of all stormwater basins at least weekly and after rain events and rectify as necessary to ensure that they are effective and ready for next rain event	Operational Management	On-going
Sedimentation basins will require periodic removal of accumulated sediments and any entrapped heavy metals from the base to retain the design operating volumes.	Operational Management	On-going
To protect the geomembrane liner around the internal faces of the sedimentation basins, removal of accumulated materials will need to be performed manually rather than by machine to avoid causing damage.	Operational Management	On-going
Perform periodic inspection and maintenance of the biofiltration raingarden treatment device to maintain capacity and proper functioning.	Operational Management	On-going
Train on-site staff on stormwater management procedures, guidelines and requirements.	Operational Management	On-going
Periodically inspect, pump-out and clean all spill containment tanks	Operational Management	On-going

4.6. Pollution and incident response management

A Pollution Incident Response Management Plan (PRIMP) has been prepared for the facility in consideration of requirements of the POEO Act and POEO (General) Regulations (refer to Attachment 9) and has been incorporated into this OEMP. The PIRMP outlines the protocol to immediately notify the following agencies in the event of an emergency or incident which is determined to have caused or threatened material harm to the environment:

- Fire & Rescue NSW;
- NSW Health Department - Public Health Unit;
- WorkCover NSW; and
- Goulburn Mulwaree Council.

The PRIMP provides the general management strategy to minimise the risk to the public and all personnel in the event of an emergency including;

- Providing adequate resources including staffing and firefighting equipment;
- Ensuring that all relevant employees would be familiar with the PIRMP;
- Training staff so that a high level of preparedness would be maintained by all people who could be involved in an emergency;
- Periodic review and update of emergency procedures for the Site.

Table 4.6 lists the management and mitigation measures that will be implemented during operation of the Facility to minimise the potential for pollution incidents.

Table 4.6. Pollution Management and Mitigation Measures.

Mitigation Measures	Responsibility	Timing / Frequency
All chemicals, fuels and oils used on site will be stored in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007</i>	Operations Management	On-going
Accidental spillage or poor management of fuels, oils, lubricants, hydraulic fluids, solvents and other chemicals during the operation of the Development will be controlled through spill management actions to prevent water quality and ecological impacts.	Operations Management	On-going
Spills, leaks or other discharge of any waste(s) or other material(s) will be cleaned up as soon as practicable after it becomes known.	Operations Management	On-going
Dangerous goods will be stored on site according to their respective ADG classes and compatibility.	Operations Management	On-going
In the event of an incident, notification and actions in the Pollution Incident Response Management Plan are to be activated	Operations Management	On-going
Pollution Incident Response Management Plan training is to be provided in weekly toolbox meetings and the plan is to be tested at least once a year.	Operations Management	Training – weekly; Testing – at least once per year

4.7. Fire Management

Fire management for the Facility will be implemented in accordance with the findings and recommendations of the Fire Safety Study (Riskcon, 2025). The fire safety framework is structured around four key categories: prevention, detection, protection, and mitigation.

4.7.1. Fire Prevention

4.7.1.1. Control of ignition sources

The site will implement a strict no smoking policy within all transfer, processing, and storage areas, with smoking permitted only in a designated external location. Housekeeping procedures will be applied daily to minimise the accumulation of combustible wastes, with staff responsible for ensuring waste is stored correctly and stockpiles are free of non-sorted materials. To address risks of deliberate ignition, the facility will be secured with perimeter fencing and staffed during business hours, thereby reducing the potential for arson. In relation to hot works and electrical works, a permit-to-work system and risk assessment will be mandatory prior to undertaking any task that introduces potential ignition sources. Together, these measures provide a systematic approach to managing ignition risks and reducing the likelihood of fire incidents on site.

4.7.1.2. Separation of incidents

The separation of incidents is used to minimise the impacts of a hazardous incident on the surrounding operations or the generation of potential “domino” effects. The waste storages around the site will be separated by the requirements of the FRNSW Guideline which minimises the potential for incident propagation between separate storages.

4.7.1.3. Housekeeping

The risk of fire can be significantly reduced by maintaining high standards of housekeeping. The site shall maintain a high housekeeping standard, ensuring all debris (e.g. waste packaging, etc.) that is released during transport, storage and processing is cleaned up and removed from the areas.

4.7.1.4. Work practices

The following work practices will be undertaken to reduce the likelihood of an incident. They include;

- Placarding & signage within the site;
- Safe work practices;
- Personal Protective Equipment;
- Emergency response plan and procedures;
- First aid fire equipment;
- Security;
- Training of personnel; and
- Compatibility, segregation and safe storage of wastes.

4.7.1.5. Emergency Plan

An emergency plan, prepared in accordance with HIPAP No. 1 – Industry Emergency Planning Guidelines (Ref. [6]), will be developed for the site as required by the Work Health and Safety Regulations 2017 (Ref. [7]). The emergency plan will clearly identify potential hazardous fire or explosion incidents and develop procedures fire response.

The plan will also include evacuation procedures and emergency contact numbers as well as an onsite emergency response structure with allocated duties to various personnel on site. This will provide readiness response in the unlikely event of an incident at the site. Notwithstanding this, the following recommendation has been made:

- A site emergency response plan and emergency services information booklet shall be prepared for the site to fully document the emergency scenarios and the appropriate responses to those emergency scenarios.

4.7.1.6. Site security

Maintaining a secure site reduces the likelihood either of a fire being started maliciously by intruders or by accident. Access to the site will be restricted at all times and only authorised personnel will be permitted within the site.

4.7.2. Detection procedures and measures

A fire scenario will likely be detected by personnel working within the vicinity of a stockpile which has been ignited. If the fire cannot be controlled by site personnel, FRNSW will be contacted to attend the site. Based on the operation of various equipment and machinery at the facility, it is recommended that fire detection requirements are investigated further to ensure appropriate shutdowns are incorporated as required.

4.7.3. Fire Protection

4.7.3.1. Fire hydrants

A fire hydrant system is to be installed in accordance with Clause E1.3 of the BCA, and the relevant provisions of AS 2419.1:2005.

4.7.3.2. Fire Hose Reels

A fire hose reel system is to be installed in accordance with Clause E1.4 of the BCA, and the relevant provisions of AS 2441:2005.

Coverage shall be achieved by providing not more than 2 changes in direction on any hose run.

4.7.3.3. Portable Fire extinguishers

Portable fire extinguishers shall be installed in accordance with Clause E1.6 of the BCA, and the relevant provisions of AS 2444:2001. Notwithstanding this, the following recommendation has been made:

- Dry powder extinguishers shall be readily accessible from waste storages to provide quick response by site personnel in the event of a fire.
- Operators shall be trained in the use of site fire extinguishers.

4.7.4. Fire Mitigation

4.7.4.1. Fire Water Supply

The street mains will provide fire water supply to the site storage tanks which will be used to supply the hydrant ring main. The supply shall allow 4 hours of hydrants operating concurrently as per the FRNSW Waste Guidelines.

Environmental controls listed in Table 4.7. will be implemented to minimise the risk and consequences of fire at the facility.

Table 4.7. Fire Management and Mitigation Measures.

Mitigation Measures	Responsibility	Timing / Frequency
Ensure a means of smoke or fire detection within stockpiles is provided for when personnel are not on site, such as with thermal cameras.	Operations Management	On-going
Consider providing portable fire extinguishers to mobile plant involved with managing the stockpiles.	Operations Manager	On-going
Provide hydrant coverage for the unprocessed mixed metal stockpiles, ensuring hydrants are not within 10 m of the pile.	Operations Manager	On-going
The potential for the isolation valves to be automatically closed upon fire detection (i.e. alarm) shall be considered.	Operations Manager	On-going
Isolation valves shall be tested every six (6) months to ensure the valves do not seize and become stuck in the open position.	Operations Manager	On-going
A site emergency response plan and emergency services information booklet shall be prepared for the site to fully document the emergency scenarios and the appropriate responses to those emergency scenarios.	Operations Manager	On-going

Mitigation Measures	Responsibility	Timing / Frequency
Dry powder extinguishers shall be readily accessible from waste storages to provide quick response by site personnel in the event of a fire.	Operations Manager	On-going
Operators shall be trained in the use of site fire extinguishers	Operations Manager	On-going
A detailed pressure loss calculation shall be prepared for the most disadvantaged hydrant to demonstrate compliance with AS 2419.1-2017.	Operations Manager	On-going
A fire equipment layout drawing shall be prepared for the site by a competent person, indicating all fire controls (extinguishers, hydrants, hose reels, etc.).	Operations Manager	On-going
Provide 288 m3 water supply for firefighting purposes in the supply tanks.	Operations Manager	On-going
Ensure the stormwater retention dam has a capacity in excess of 288 m3 for potentially contaminated firewater containment.	Operational Manager	On-going

4.8. Waste Management

A Waste Management Plan has been prepared to guide how waste will be dealt with in the most environmentally sustainable way. The Waste Management Plan is contained in Attachment 10. Waste management and mitigation measures, additional to those proposed in the WMP, which will be implemented at the Facility are outlined in Table 4.8.

Table 4.8. Waste Management and Mitigation Measures.

Mitigation Measures	Responsibility	Timing / Frequency
The Site will not receive or process on the Site more than 30,000 tonnes of waste per calendar year.	Operations Management	On-going
Waste management and minimisation will form part of the induction program (which includes environmental due diligence training). All Project and site personnel will be trained in the requirements of this document including minimising wastes, recognising which types of materials are recyclable and their obligations to use recycling facilities provided on site.	Operations Manager	Prior to starting on site / Ongoing
Clearly assign and communicate responsibilities to ensure that those involved in the construction are aware of their responsibilities in relation to the waste management plan	Operations Manager	Prior to starting on site / Ongoing
Engage and educate personnel on how the various elements of the waste management plan will be implemented	Operations Manager	Prior to starting on site / Ongoing
Specific locations for waste management (e.g. recycling bin locations, material stockpile locations) will be established on site and signposted appropriately.	Operations Manager	Weekly checks
Waste management areas will be adequately managed to prevent sediment runoff and dust generation.	Operations Manager	Daily
Construction Method Statements (CMS) will include practices to minimise waste generation and to maximise recycling and reuse of materials including oils, greases, lubricants, timber, glass, and metal.	Operations Manager	Prior to start of construction and ongoing
Packaging minimisation and reuse initiatives will be implemented as part of the procurement.	Operations Manager	Ongoing

Mitigation Measures	Responsibility	Timing / Frequency
Spill kit to be present on site in the case of any fuel leaks of plant and equipment during the construction phase of the development	Operations Manager	Prior to start of construction
Segregated waste disposal containers for the collection and recycling/disposal of all waste streams generated during the construction and operation phases will be provided onsite. Waste disposal containers will have clear signage and instructions for use to avoid cross-contamination. No rubbish shall be disposed of on site.	Operations Manager	Daily
Waste will be disposed to an appropriate licensed facility.	Operations Manager	Daily
All waste being transported off site must be covered. The transportation must be appropriately licensed to carry that material.	Operations Manager	Daily
Incompatible wastes will not be mixed.	Operations Manager	Daily
Storage areas would be located away from waterways and the stormwater system.	Operations Manager	Daily
Biodegradable products will be used wherever practicable.	Operations Manager	Daily
Regular collection of wastes will ensure air emissions are at a satisfactory level. Inappropriate waste and wastewater management systems will be regularly inspected and audited.	Operations Manager	Daily
Conduct regular litter patrols to ensure litter is effectively controlled on site.	Operations Manager	Daily

5. Environmental Incidents Management Strategy

An environmental incidents management strategy has been developed to ensure that any environmental incident caused by or relating to the operation of the Development is effectively responded to, and any resulting adverse environmental and/or community impact is promptly prevented or effectively managed.

The following procedure is for general environmental incidents that have the potential to cause material harm to the environment. Smaller, minor incidents will be managed in accordance with the Facility's Emergency Preparedness and Response procedure and the PIRMP Attachments 6 and 9, respectively.

5.1. Responsibility

The Facility's Management is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of an environmental incident.

All employees and contractors are to:

- Take immediate action to notify Site Management of any environmental incident; and
- Take immediate action (where it is safe to do so) to prevent, stop, contain and/or minimise the environmental impact of the incident.

5.2. Handling Procedure

Upon becoming aware of an environmental incident, Sydney Metal Trader's Management is to undertake the following:

Preventative Action

Where possible and it is safe to do so, immediate action should be taken to prevent, stop, contain and/or minimise the environmental impact of the incident. This may include:

- Making all efforts to contain all fire water at the Facility;
- Making all efforts to control air pollution from the Facility;
- Making all efforts to contain any discharge, spill or run-off from the Facility;
- Making all efforts to prevent flood water entering the Facility; and
- Making the Facility secure.

In the unlikely event that a pollution incident requires the evacuation of the Site, actions will be completed in accordance with the Pollution Incident Response Management Plan (Attachment 9). All employees and contractors are informed of the location of emergency assembly areas through site inductions, signage and toolbox talks.

Notify

Under the provisions of the POEO Act, there is a duty to notify any incident that has caused or threatens to cause material harm to the environment and all relevant information about the incident. This duty extends to the following:

- A person engaged as an employee or contractor must, immediately after becoming aware of the incident, notify the employer of the incident and all relevant information. If the employer cannot be contacted, the person is required to notify each relevant authority and provide all relevant information; and
- An employer who is notified of an incident or who otherwise becomes aware of an incident must, immediately after becoming aware of the incident, notify each relevant authority and provide all relevant information.

Under the POEO Act, the "relevant authority" means any of the following:

- The appropriate regulatory authority (refer to Table 1.2 above);
- If the NSW EPA is the appropriate regulatory authority - the NSW EPA;

- If the EPA is not the appropriate regulatory authority - the local authority for the area in which the pollution incident occurs (i.e. Council);
- NSW Health;
- SafeWork NSW; and
- Fire and Rescue NSW.

Relevant contact details for the regulatory authorities that have an interest in the Development are listed in Table 1.2. Sydney Metal Traders will provide written details of the notification to Goulburn Mulwaree Council, EPA and any other relevant agencies within 7 days of the date on which the incident occurred.

In the event of a serious incident or emergency, it is more than likely that the Fire and Rescue NSW and/or the EPA will take control and manage the required investigation and remedial activities. Any instructions issued must be strictly adhered to.

Assistance

Where assistance is required handling the situation, the Operations Manager should be contacted.

Where the incident is reported via a government agency (i.e. Council or the EPA), The Operations Manager must be notified immediately (even if outside of normal business hours).

If adequate resources are not available and the incident threatens public health, property or the environment, it is essential that Fire and Rescue Service NSW and/or the EPA be contacted. Relevant contact details are listed in Table 1.2.

Investigate

Undertake immediate investigative work to determine the cause of the incident.

Remedial Action

Undertake appropriate remedial action to address the cause of the incident and mitigate any further environmental impact. In some instances, outside resources such as specialist contractors/consultants may be required.

Remedial action may include:

- Remediate and rehabilitating any exposed areas of soil and/or waste; and
- Monitoring surface water leaving the premises.

Record

An assessment of the incident will be conducted and documented to minimise the potential for similar events in the future. Every environmental incident will be recorded in Sydney Metal Trader's electronic record system. If the system is unavailable, then the incident will be recorded on Sydney Metal Trader's Non-Conformance Report. A copy of all completed forms should be maintained for at least four years.

Review

In the instance an incident report is submitted, the Environmental Incident Management Strategy will be reviewed in accordance with Table 10.1 below.

5.3. Preventative Action

Once the incident has been suitably handled, appropriate preventative measures should be identified and implemented to negate the possibility of re-occurrence.

5.4. Environmental Response Plans

The following documents include identification of situations that have the potential to impact the environment and measures to prevent, respond to and mitigate such impacts:

- Procedure for Traffic Management;
- Procedure for Air Quality Minimisation;
- Procedure for Minimising Noise Pollution;
- Procedure for Non-Conforming Waste;
- Procedure for Stormwater Pollution Prevention;
- Procedure for Emergency Preparedness and Response;
- Procedure for Fire Prevention
- Procedure for Weighbridge Management
- Pollution Incident Response Management Plan; and
- Waste Management Plan.

Collectively, these documents are known as the Facility's Environmental Response Plans and are attachments to this OEMP.

Table 5.1 provides an overview of each Environmental Emergency Response Plan.

Table 5.1. Environmental Emergency Response Plans.

Environmental Response Plans	Purpose of the Plan
Procedure for Traffic Management	• To ensure 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
Procedure for Odour, Dust and Litter minimisation	• To ensure the facility does not accept odorous waste. • To ensure that no dust leaves the facility. • To ensure that no litter escapes the facility
Procedure for Minimising Noise Pollution	• To ensure that noise pollution is minimised on the site and the facility fully complies with the EPA's <i>Noise Policy for Industry</i>
Procedure for non-conforming waste	• To ensure that non-conforming waste (waste that does not meet the NSW EPA classification of <i>General waste – non-putrescible</i>) is not received at the Site. • If non-conforming waste is found on the site, to ensure it is managed in a way that minimises harm to human health and the environment
Procedure for Stormwater Pollution Prevention	• To ensure that the stormwater system functions effectively. • To ensure that the quality of receiving watercourses and rivers is not impacted by stormwater from the Site
Procedure for Emergency Preparedness and Response	• To ensure that fire safety requirements are met and to identify fire hazards to human health and the environment
Procedure for Fire Prevention	• To ensure that fire safety requirements are met and to identify fire hazards to human health and the environment. • To ensure that all fire risks are minimised on the Site
Procedure for Weighbridge Management	• Sets out procedural aspects to ensure all waste received and products / waste transported out of the facility is accurately recorded and reported on a monthly basis to the EPA. • Ensure compliance with Clause 36 of the <i>Protection of the Environment Operations (Waste) Regulation 2014</i>
Pollution Incident Response Management Plan	• Ensure comprehensive and timely communication about a pollution incident to staff, EPA, authorities and other stakeholders • Minimise and control the risk of a pollution incident by identifying risks and planning actions to minimise and manage them • Ensure that the plan is properly implemented by nominated trained staff, and regularly tested

Environmental Response Plans	Purpose of the Plan
Waste Management Plan	• Minimise the adverse environmental impacts associated with waste storage and collection; • Ensure that waste storage areas are conveniently located for both the user and waste collector; • Minimise the likelihood of illegal dumping; • Ensure optimum hygiene in the management of waste; • Minimise adverse amenity impacts associated with waste storage

6. Implementing the OEMP

The primary objective of the implementation and operation stage is to ensure that the support processes are in place to manage environmental risk.

6.1. Roles and responsibilities

Personnel have allocated responsibilities under this OEMP. These responsibilities relate predominantly to overall accountability, setting and maintaining strategic direction, allocation of resources, provision of business support services and management review. These are summarised below:

6.1.1. General Manager

Under this OEMP, the General Manager is accountable for:

- Company environmental commitment for the facility;
- Endorsing the Environmental Policy; and
- Ensuring the availability of resources to implement the OEMP.

6.1.2. Operations Manager

Under this OEMP, the Operations Manager is accountable for:

- Implementation of the Environmental Policy;
- Establishment, maintenance and implementation of the OEMP and its procedures;
- Establishment, maintenance, and implementation of the PIRMP;
- Reporting environmental performance against the OEMP to the General Manager; and
- Management of allocated resources to implement and maintain the OEMP.

6.1.3. Employees

Under this OEMP, the Employees are accountable for:

- Implementation of the Environmental Policy (as applicable);
- Implementation of the OEMP and its procedures (as applicable); and
- Implementation of the PIRMP (as applicable).

6.2. Training and Awareness

The management of training and awareness generally incorporates the following elements.

6.2.1. General Induction Training

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 the Operations Manager. 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.

The specific induction is to include but not be limited to:

- Safety and operating procedures and the correct identification of environmental hazards;
- Operation of plant and equipment;
- Identification of wastes;

- Accurate data recording;
- Emergency Response Plan as outlined in this OEMP; and
- Pollution incident response management plan.

6.2.2. General environmental awareness

All employees and contractor personnel shall receive Environmental Awareness training. The General Environmental Awareness Training program shall include the following:

- The Environmental Policy;
- Sensitive environments and neighbours around their work area;
- Significant Environmental Activities;
- Site Legal and other requirements; and
- OEMP non-conformance reporting requirements.

6.2.3. Induction

All employees shall undergo induction training which comprises:

- Overview of the OEMP;
- Objectives and targets;
- Environmental Management Plans and their responsibilities under their OEMP; and
- Reporting the status of their actions under the OEMP.

6.2.4. Ongoing training

The ongoing competency and training requirements will be reviewed on an annual or as-needs basis depending on staffing at the site and triggers for ongoing training such as:

- Changes in procedures;
- Changes in regulations;
- Equipment upgrades or changes in equipment;
- Errors or deficiencies in job performance; and
- Errors in data reporting.

7. Communicating the OEMP

7.1. Internal Communications

The minimum internal communications required to administer, maintain and update the OEMP is outlined in Table 7.1.

Table 7.1 Minimum internal communications.

Position	Internal communications with:
General Manager	- Operations Manager - Promote Environmental Policy - Performance against the OEMP Objectives and Targets - OEMP and compliance audit results
Operations Manager	- General Manager: - Consult and obtain approval for Objectives and Targets - Immediate notification of pollution incidents of material harm to the environment - Annual reporting on: - Performance against the OEMP Objectives and Targets - OEMP and compliance audit results - Quarterly reporting on: - Performance against the OEMP Objectives and Targets - Pollution incidents and status of incident closure - Progress implementing the OEMP - Status of corrective actions closure - Operational Staff - Leading the OEMP Management Review - Liaison and annual update of OEMP and EMPs
Operator/contractors	- Operations Manager - Immediate notification of pollution incidents of material harm to the environment - Notification of non-material of pollution incidents within 24 hours of occurrence - Monthly reporting on: - Pollution incidents and status of incident closure - Progress implementing the OEMP - Corrective actions arising from site inspections and other surveillance

7.2. External Communications

All external communications must be undertaken in accordance with corporate protocols on communications with stakeholders and the media.

The minimum external communications required to administer, maintain and update the OEMP and personnel responsible for the communication is outlined in Table 7.2.

Table 7.2. Minimum external communications.

Message type/frequency	Responsibility allocated to:	Method of communication:
Media response, media releases and/or material pollution incidents (As required)	General Manager	Telephone, email, letter. Media release website
Consent Monitoring Data (if/when required)	Operations Manager	Website
Notification to regulators and emergency response of material pollution incident (as required)	General Manager / Operations Manager	As per PIRMP
Notification to stakeholders of non-material pollution incident (as required)	General Manager / Operations Manager	Telephone, email, letter, website
Response to community complaints and/or non- material pollution incidents	General Manager / Operations Manager	Telephone, email, letter.

7.3. Community complaints

A community complaint handling process has been developed to ensure all environmental complaints regarding the operation of the Facility are promptly and effectively received, handled, and addressed.

Sydney Metal Traders is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of a complaint. All employees and contractors who receive a complaint, either verbal or written, are to immediately notify Site Management.

Community complaints relating to the Facility can be received via:

- Sydney Metal Traders company or site office;
- Sydney Metal Traders Complaints and Feedback number – TBC.
- Sydney Metal Traders Internet enquiry - TBC and/or
- Through a government agency (i.e. Council or EPA).

7.3.1. Handling Procedure

Upon becoming aware of a complaint, Port Kembla Metal Traders Site Management is to undertake the following:

Receive

In the normal course of events, the first contact for complaints will usually be made in person or by telephone.

While this should instigate investigative action, a formal written complaint should be requested. Where the initial contact reaches an employee or contractor who is not a representative of Site Management, the call should be directed to Site Management. If unavailable, the complainant's details should be taken with a view to returning the contact once Site Management is in a position to discuss the matter.

The complainant's name, address and contact details, along with the nature of the complaint, must be requested. If the complainant refuses to supply the requested information, a note should be made on the form and complainant advised of same. The date and time of the complaint will also be recorded along with the method the complaint was made.

Assistance

Where assistance is required handling the situation, Sydney Metal Traders Management should be contacted. Where the complaint is reported via a government agency (i.e. Council or the EPA), Sydney Metal Trader's General Manager must be notified immediately (even if outside of normal business hours).

Investigate

A field investigation should be initiated in an attempt to establish the legitimacy of the complaint and the cause of the problem. Sydney Metal Trader's Management should be consulted to identify any abnormality or incident that may have resulted in the complaint. Details may include heavy vehicle activity, equipment, and machinery activities, etc.

If the complaint is due to an environmental incident, the management strategy outlined in Section 6 should be followed, and if the incident has caused or threatens to cause material harm to the environment each of the relevant regulatory agencies must be immediately notified.

Action

Once the legitimacy and cause of the complaint has been established, every possible effort must be made to undertake appropriate remedial action(s) to fix the cause of the complaint and mitigate any further impact.

Inform

The investigative work and remedial action should be reported back to the complainant and, if necessary, the relevant regulatory agencies.

Record

Every complaint received is to be recorded within the complaints register located in Sydney Metal Trader's electronic record system. If the system is unavailable, then the complaint is to be recorded on Sydney Metal Trader's Incident Non-Conformance Report Form. The complaints register will be updated on a monthly basis and made publicly available on the Sydney Metal Trader's website.

The complaints register will record the action taken by Sydney Metal Traders in relation to the complaint or if no action taken the reason why no action was taken. Complaint records will be kept for at least 4 years after the complaint was made.

Preventative Action

Once the complaint has been suitably handled, appropriate preventative measures will be identified and implemented to negate the possibility of re-occurrence.

Dispute Resolution

In the event that a dispute arises between Sydney Metal Traders and Council or a public authority, in relation to an applicable requirement of the Development Consent or relevant matter relating to the site, either party may refer the matter to the DPIE (Secretary of) for resolution. The Secretary's determination of any such dispute must be final and binding on the parties.

In the case of a dispute between Sydney Metal Traders and a community member/complainant, either party may refer the matter to the relevant regulatory authority for consideration, advice and/or negotiation. If the matter escalates, a third-party mediator may be required.

8. Document Control

The following documents are controlled documents controlled by Operations Manager:

- The OEMP;
- Environmental Management Plans;
- Forms, templates and proformas;
- Registers;
- Progress reports;
- Monitoring data;
- Annual progress report to management; and
- Statutory monitoring and reporting.

8.1. Document Control Procedure

The current versions of all OEMP Documents are available as 'read-only' documents. An up-to-date copy (with version control) of each document will be held on a secure server with relevant linkages to systems and management.

Only the current, electronic versions of OEMP Documents accessed through the above link are controlled. If using hard copies of OEMP Documents, it is the users' responsibility to ensure that they are using the latest version. All hard copies are uncontrolled.

The Operations Manager is responsible for the storage, review and update of all controlled OEMP documents.

The Operations Manager will maintain a Register of Current Version of OEMP documents. The Register will record Document Title, Current Version Number and Date current version was made effective.

The Operations Manager will ensure that each controlled document is appropriately tagged with Document Title, Current Version Number and Date current version was made effective. In addition, a summary of each revision will be documented in the revision history table on each controlled document.

9. Checking the OEMP

The primary objective of the checking and corrective action stage is to monitor the implementation and effectiveness of the environmental actions identified by the OEMP planning and implementation documentation and identify corrective actions where necessary.

9.1. Evaluation of Compliance

Non-conformances relating to the Facility activities and the OEMP include the following:

- 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 compliance impact with legal requirements;
- A non-conformance with the OEMP requirements described in the EMPs or other environmental directives;
- Non-conformances generated from monitoring and auditing the OEMP and EMPs;
- Significant failure to implement mitigation measures; and
- Complaints not resolved within 24 hours.

The Operations Manager, personnel and associated contractors shall be trained in what constitutes a non-conformance and how non-conformance are to be managed.

Non-conformances are to be reported to the Operations Manager who is responsible for the following:

The Operations Manager must:

- Notify the General Manager of the non-conformance in accordance with the timeframe stipulated on the form;
- Implement the corrective actions determined as part of the process; and
- Report to the General Manager on progress and when the corrective actions have been closed out.

Where corrective actions are beyond the control of the Operations Manager, these corrective actions are to be drawn to the attention of the General Manager for support.

The General Manager must:

- Enter the non-conformance on the non-conformance register for tracking;
- Provide support to the supervisor when corrective actions are beyond the control of the supervisor;
- Monitor progress and close out corrective actions on the register; and
- Undertake targeted inspections to verify close out corrective actions.

9.2. Review of Environmental Impacts and Management Plans

The Operations Manager / General Manager shall determine whether the activity generating the non-compliance warrants a re-evaluation of the risk it presents to the environment and associated management plans.

9.3. Auditing the OEMP and Associated Plans

Table 10.1 provides a schedule for auditing the OEMP and associated documents.

Table 10.1. Audit Schedule.

Audit Document	January	February	March	April	May	June	July	August	September	October	November	December
Internal Audit						✓						
Performance of EMS and Plans (Internal)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Achieving objectives and targets									✓			
Pollution Incident Response Management Plan ¹			✓									

¹ A review of the PIRMP is required to be completed within 30 days of a pollution incident.

10. Adjusting the OEMP

The process is established to facilitate improvement of the OEMP through periodic formal review and discussion of OEMP performance to determine whether the OEMP remains suitable, adequate and effective for the Facility. Consequently, this OEMP is a working document that is designed to ensure any changes that could affect an environmental incident are captured.

10.1. Management Review and Updating the OEMP

Three levels of monitoring are required to implement the obligations under this OEMP. The objectives of these levels of environmental monitoring are to assess whether operations are:

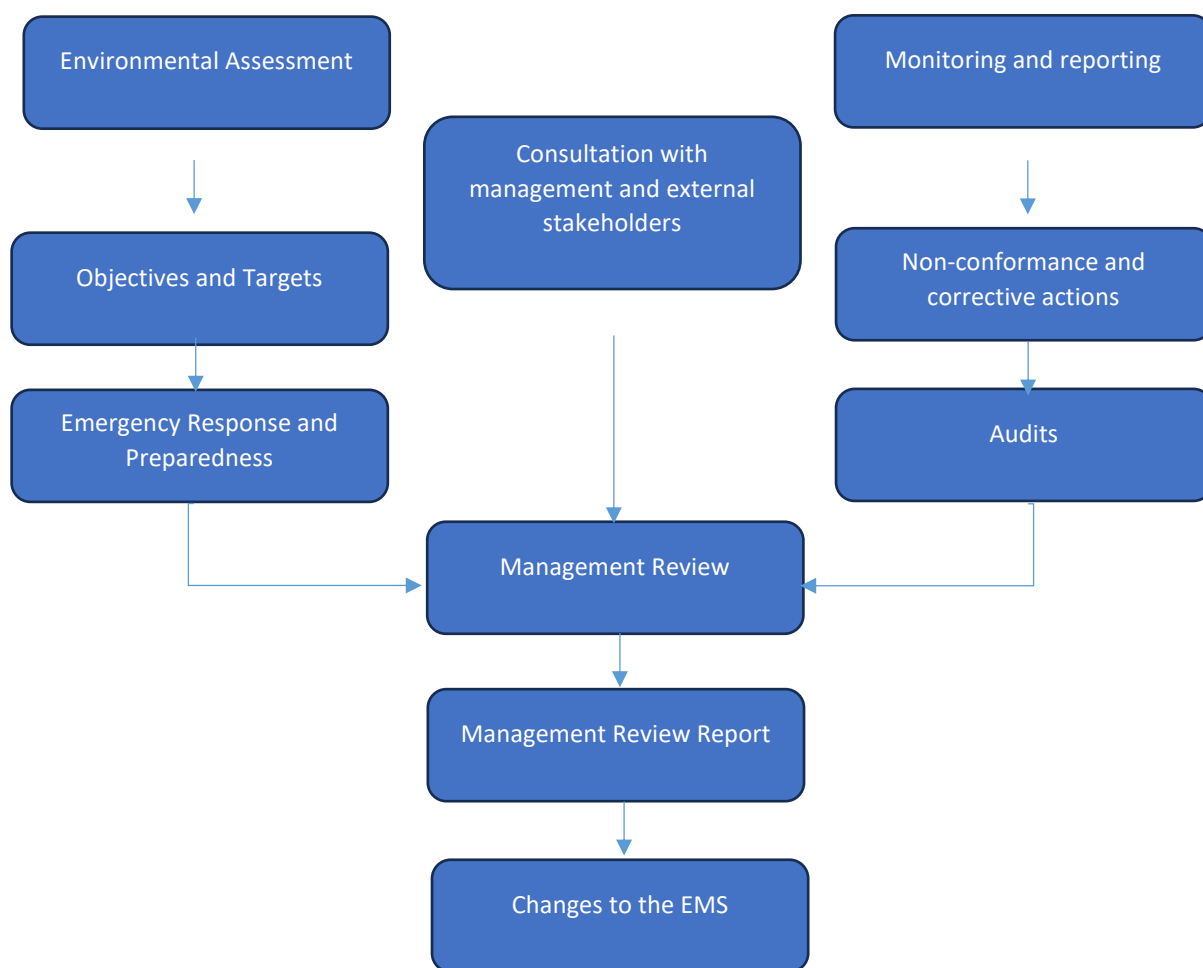
- Meeting environmental regulatory and other obligations;
- Managing significant environmental risks; and
- Meeting Company Objectives and Targets.

Monitoring is undertaken via:

- Monitoring required by licences and other statutory instruments (where required);
- Internal and external compliance and system audits; and
- Senior management review.

Management Review process is established to facilitate improvement of the OEMP through periodic formal review and discussion of OEMP performance to determine whether the OEMP is suitable, adequate and effective for the Facility. The Management Review is facilitated by the General Manager, ensuring the recommendations of the Management Review are implemented. This OEMP is to be reviewed annually as a minimum.

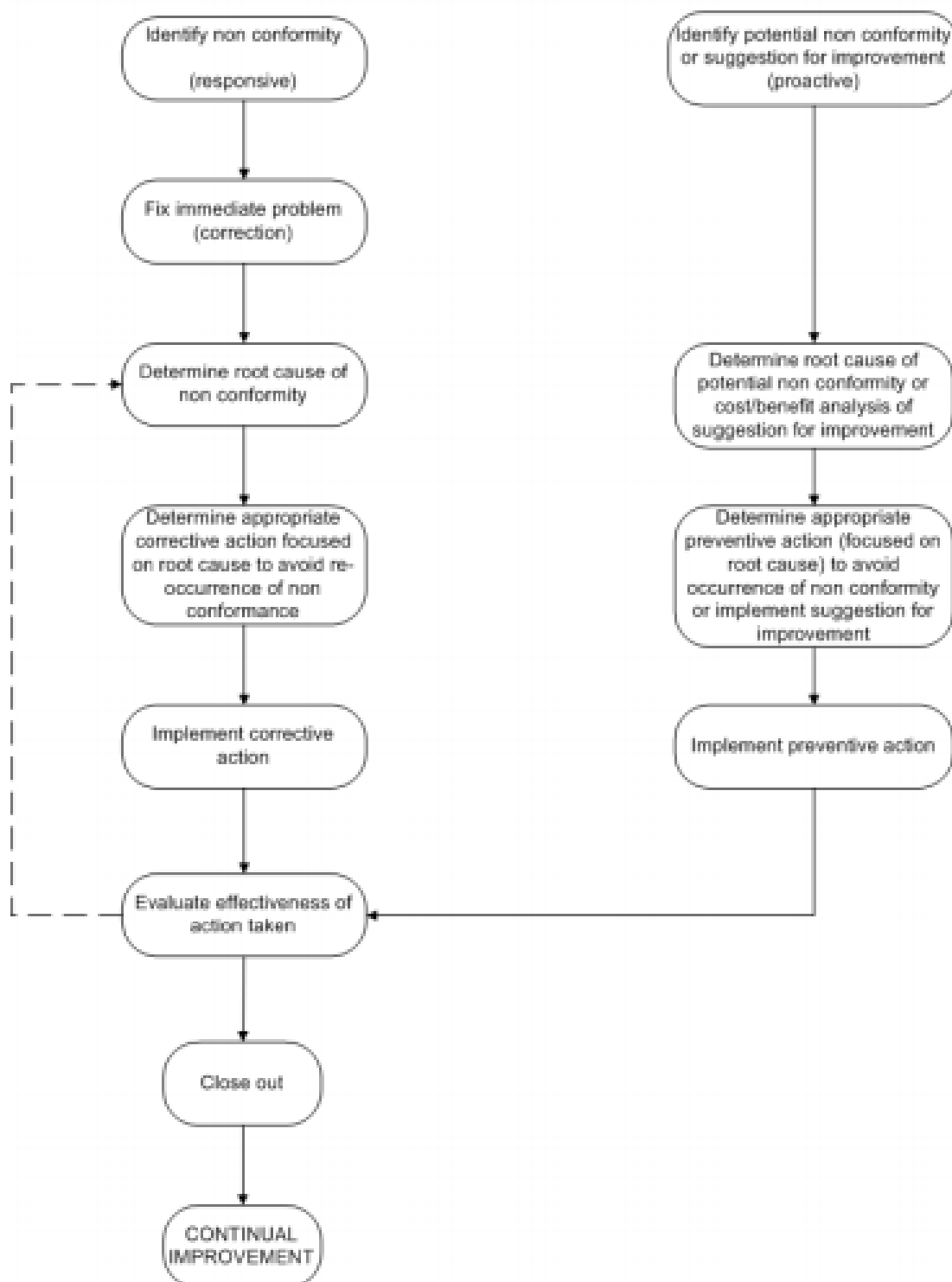
Figure 10.1. Environmental Monitoring, Audit and Review Procedure.



11. Continuous Improvement

The internal system audits will be conducted in accordance with a schedule nominated in this OEMP. Environmental audits will assess the Facility against any Conditions of Approval imposed by statutory authorities. The register that is completed during compliance audits become a record of the evaluation of compliance. All detected non-compliances will be followed up with corrective actions as per the flow chart below Figure 11.1).

Figure 11.1. Continuous Improvement Process.



Attachment 1: Procedure for Traffic Management

TRAFFIC MANAGEMENT PROCEDURE

Sydney Metal Traders
Scrap Metal Recycling Facility
88 Murrays Flat Road, Towrang

1. PURPOSE OF THIS PROCEDURE

To ensure the safe movement of vehicular and pedestrian traffic, the protection of workers from passing traffic and to minimise conflict between vehicles accessing parts of the Facility

2. RESPONSIBLE PERSON

Operations Manager

3. ASSOCIATED INTERNAL DOCUMENTS

Operational Environmental Management Plan



Pollution Incident Response Management Plan



Hemanote Consultants Pty Ltd, Traffic & Parking Impact Assessment, May 2026

4. EXTERNAL REFERENCE DOCUMENTS

NSW Protection of the Environment Operations Act 1997

NSW Noise Policy for Industrial (NSW EPA, 2017)

Work Health and Safety Act 2011

Roads Regulation 2008

5. MAIN TRAFFIC RISKS AT THE SITE

Interaction between vehicles and pedestrians/employees

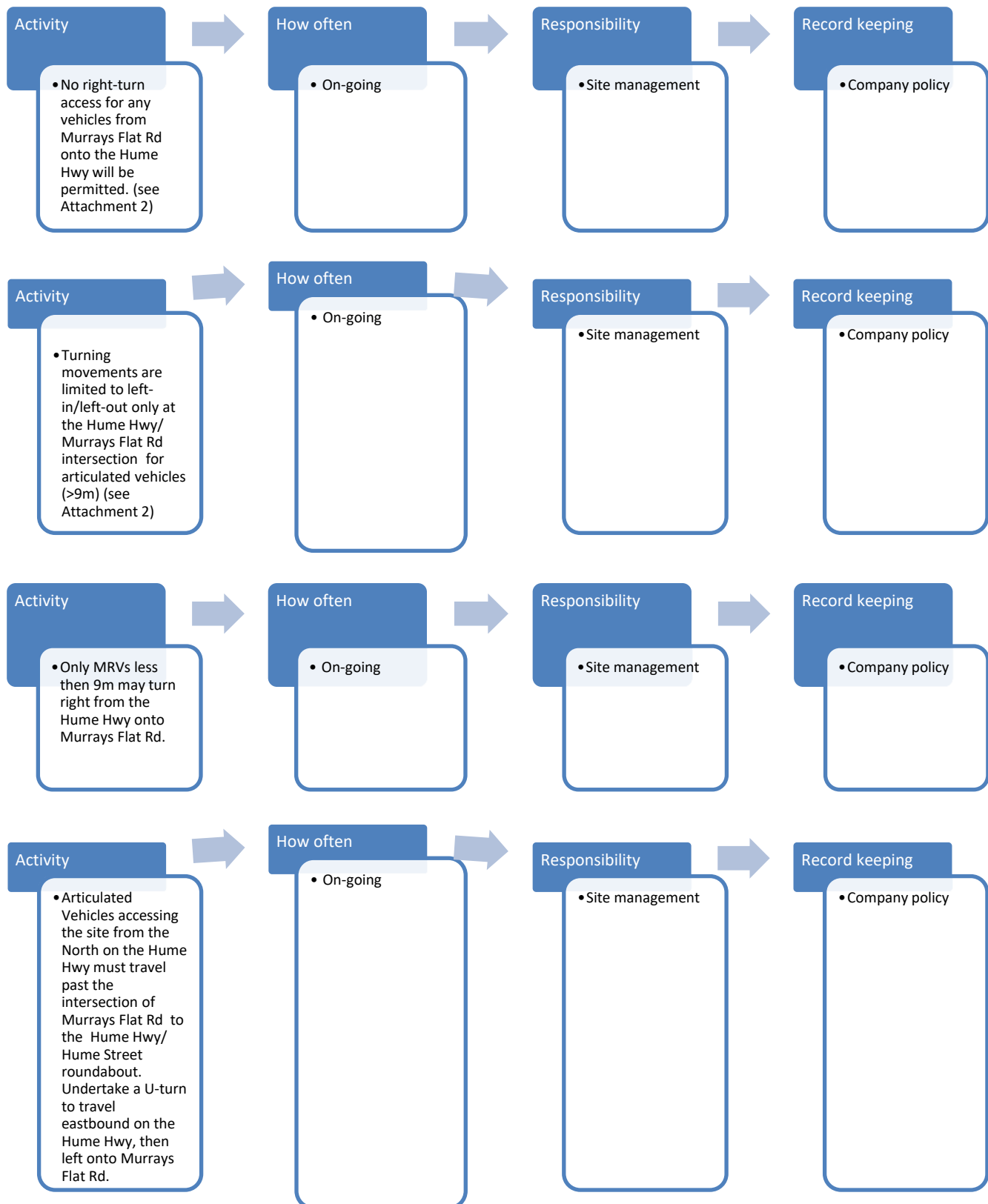


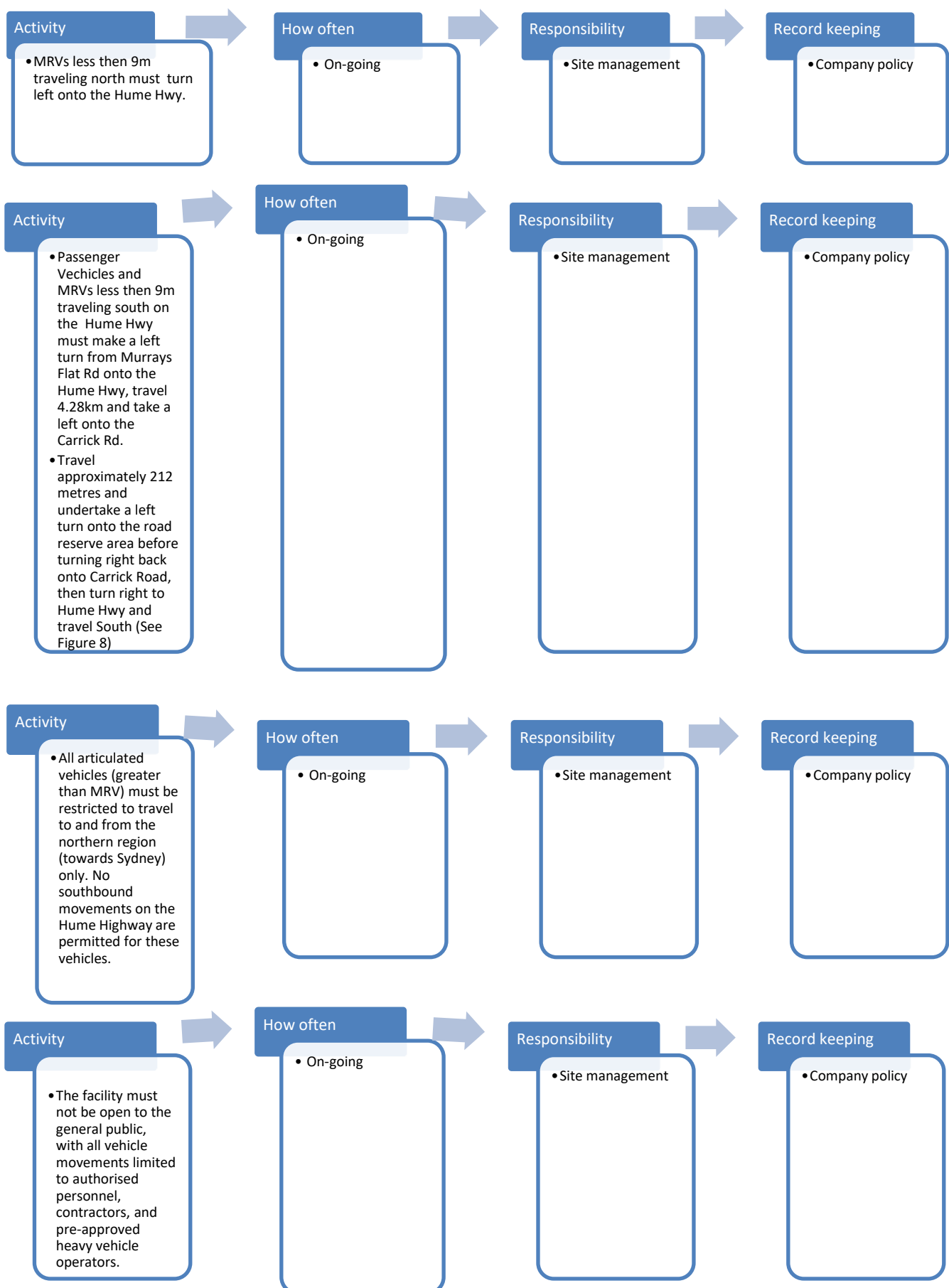
Transportation to and from site including Hume highway and Murrays Flat Road intersection safety

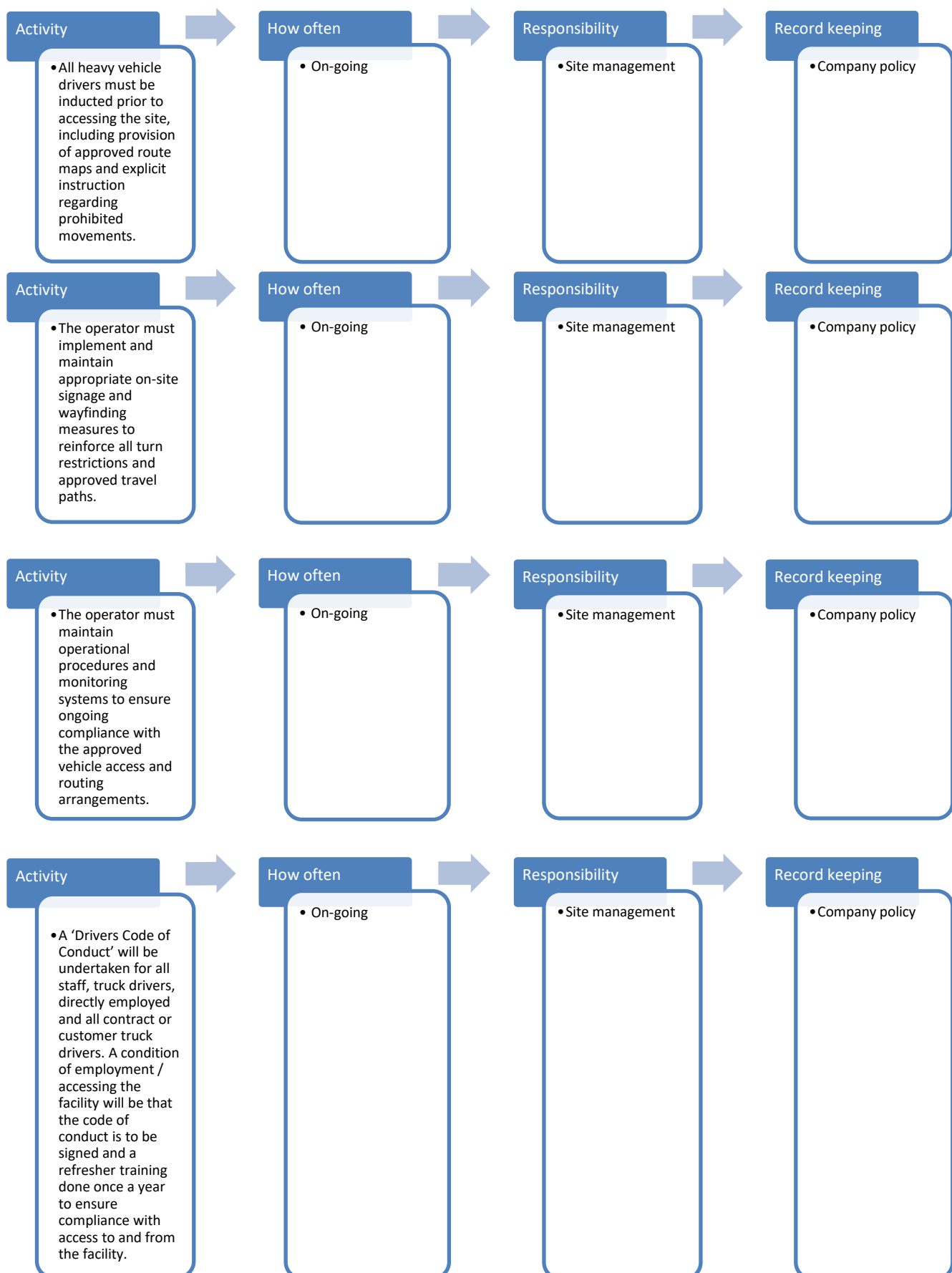


Potential for truck and passenger vehicle queueing to impact the local roads

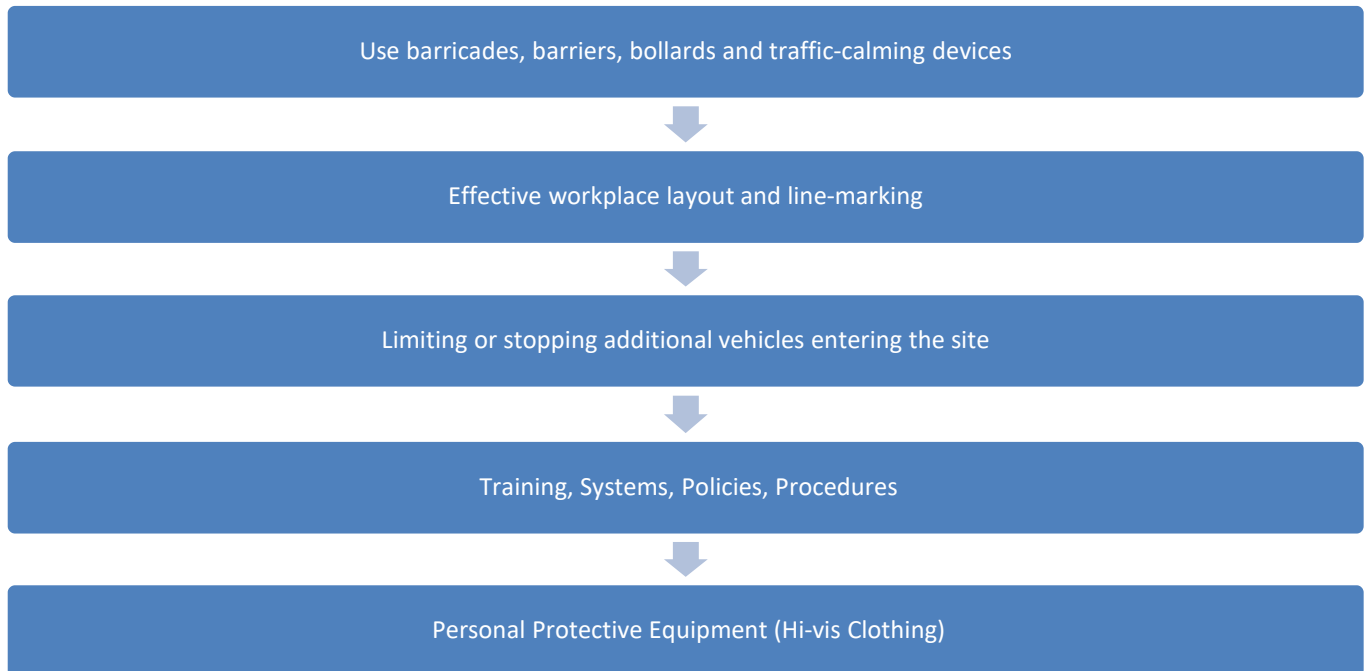
6. PREVENTATIVE MEASURES TO BE UNDERTAKEN



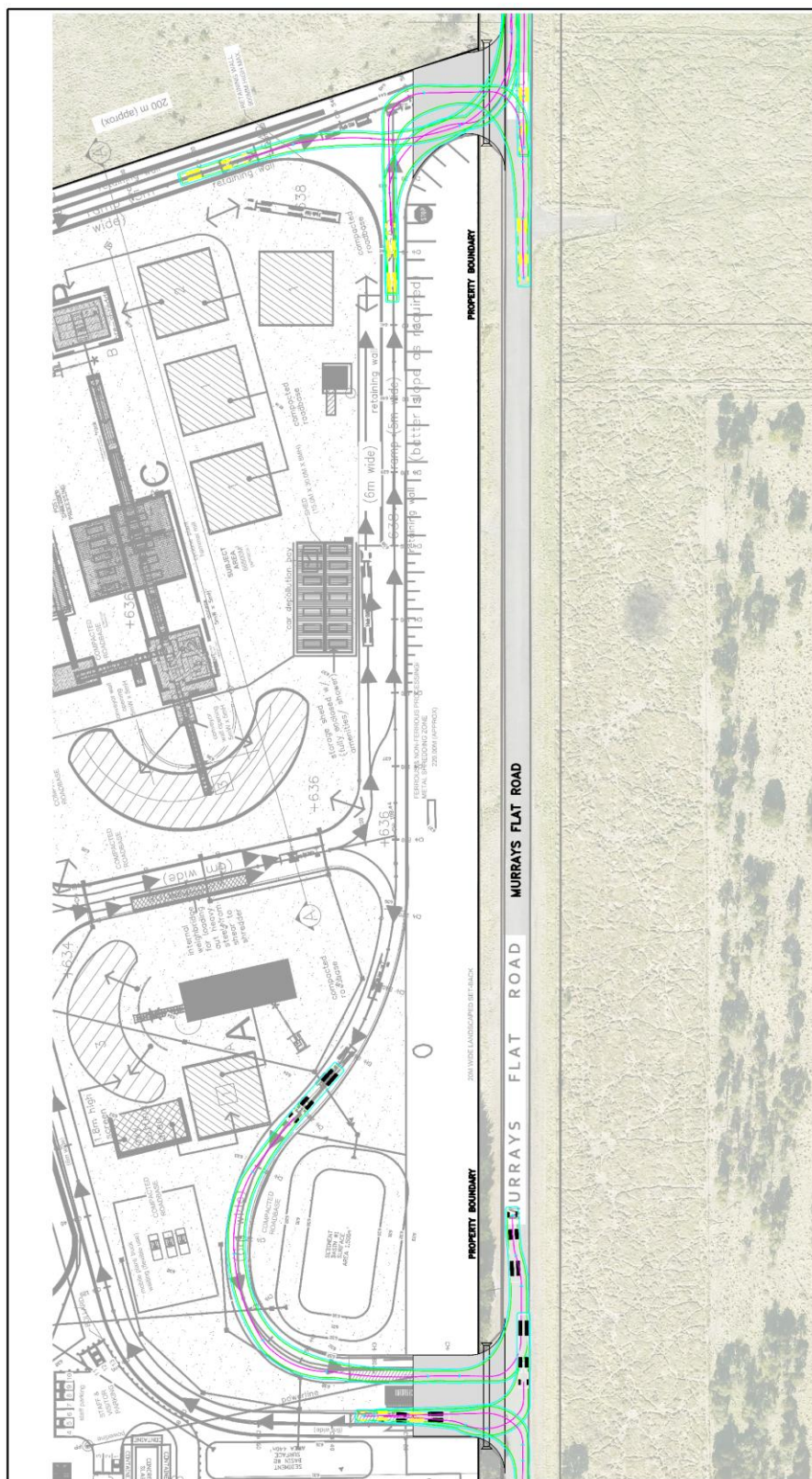


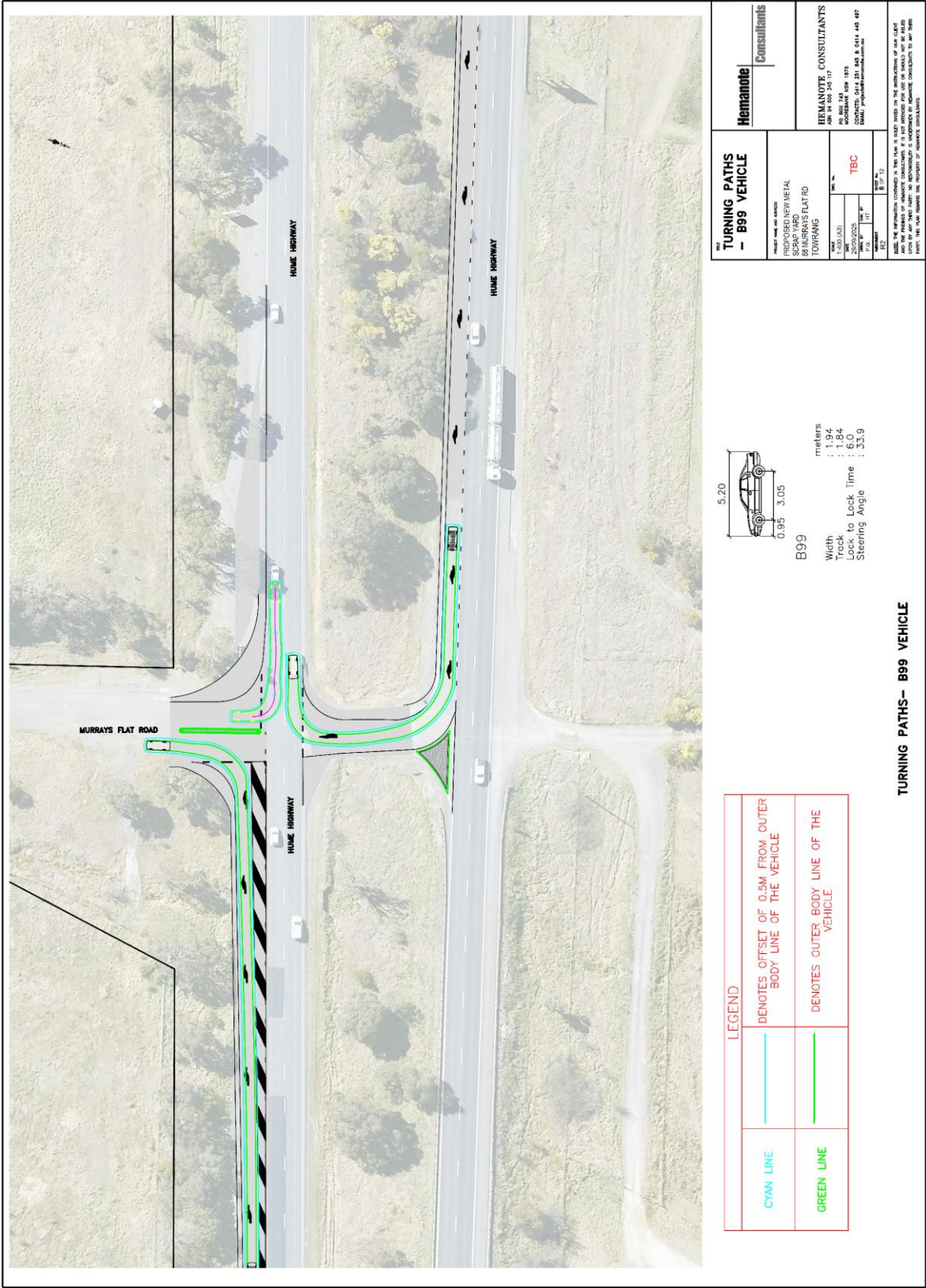


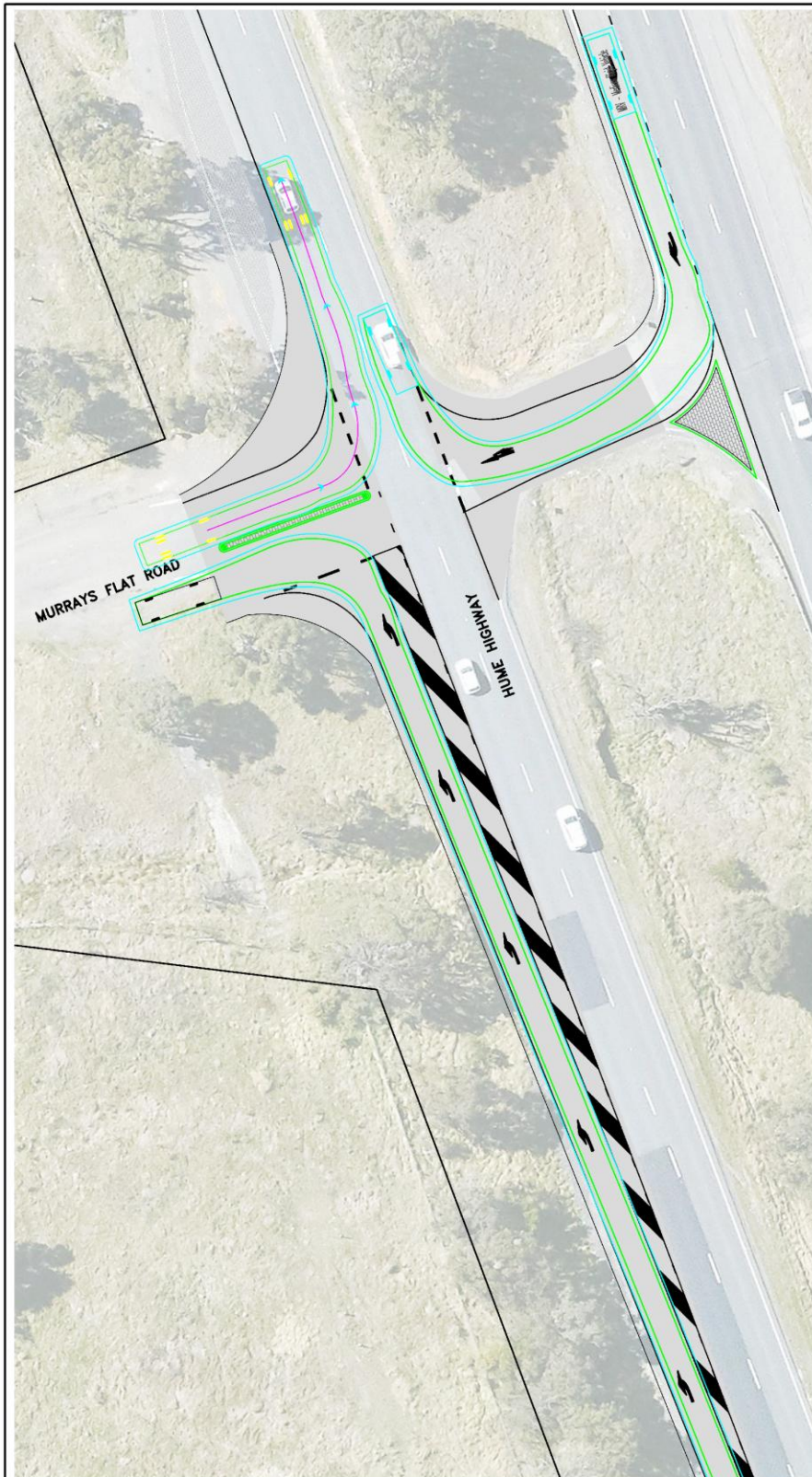
7. OTHER TRAFFIC MANAGEMENT CONTROL MEASURES

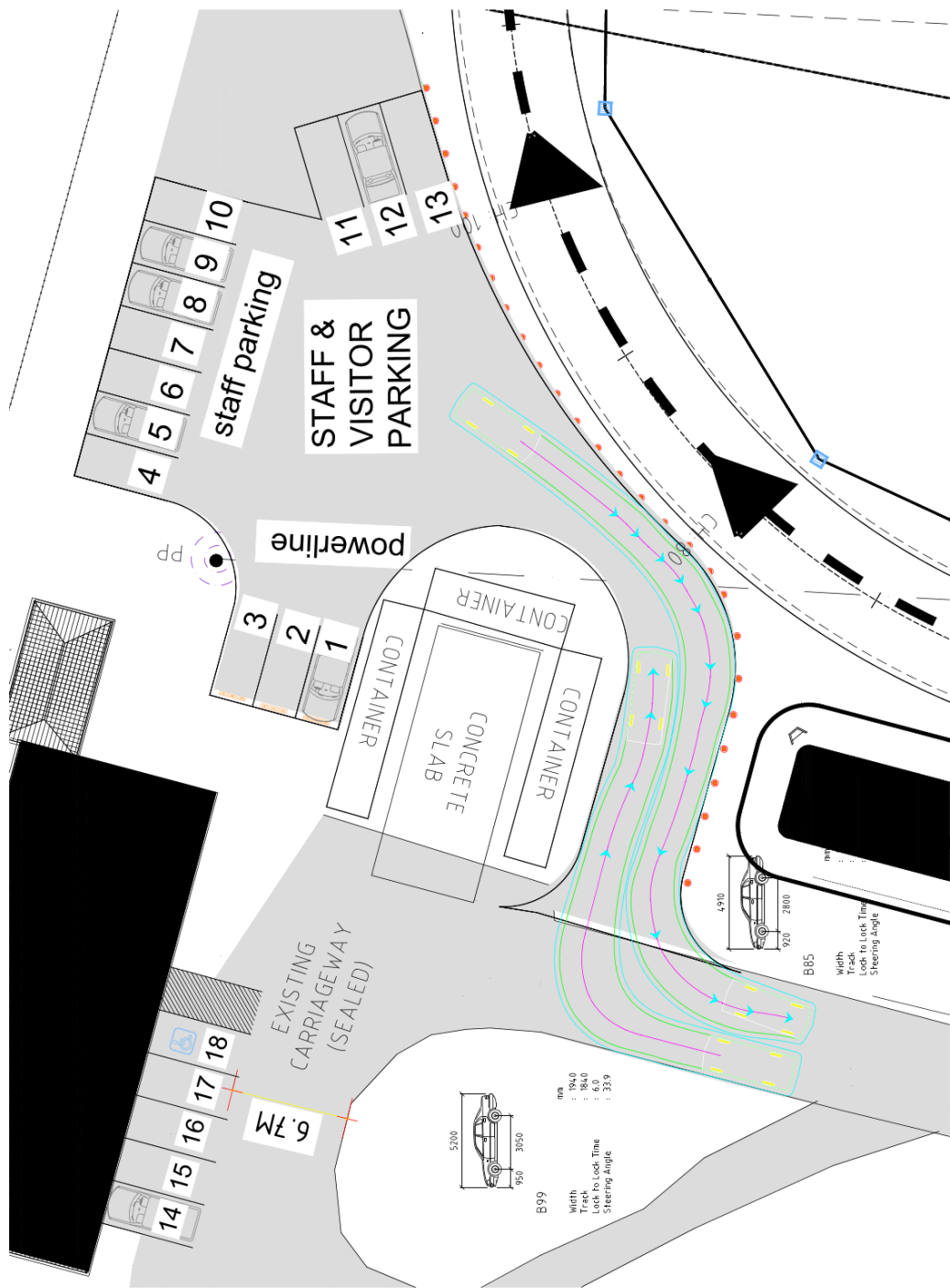


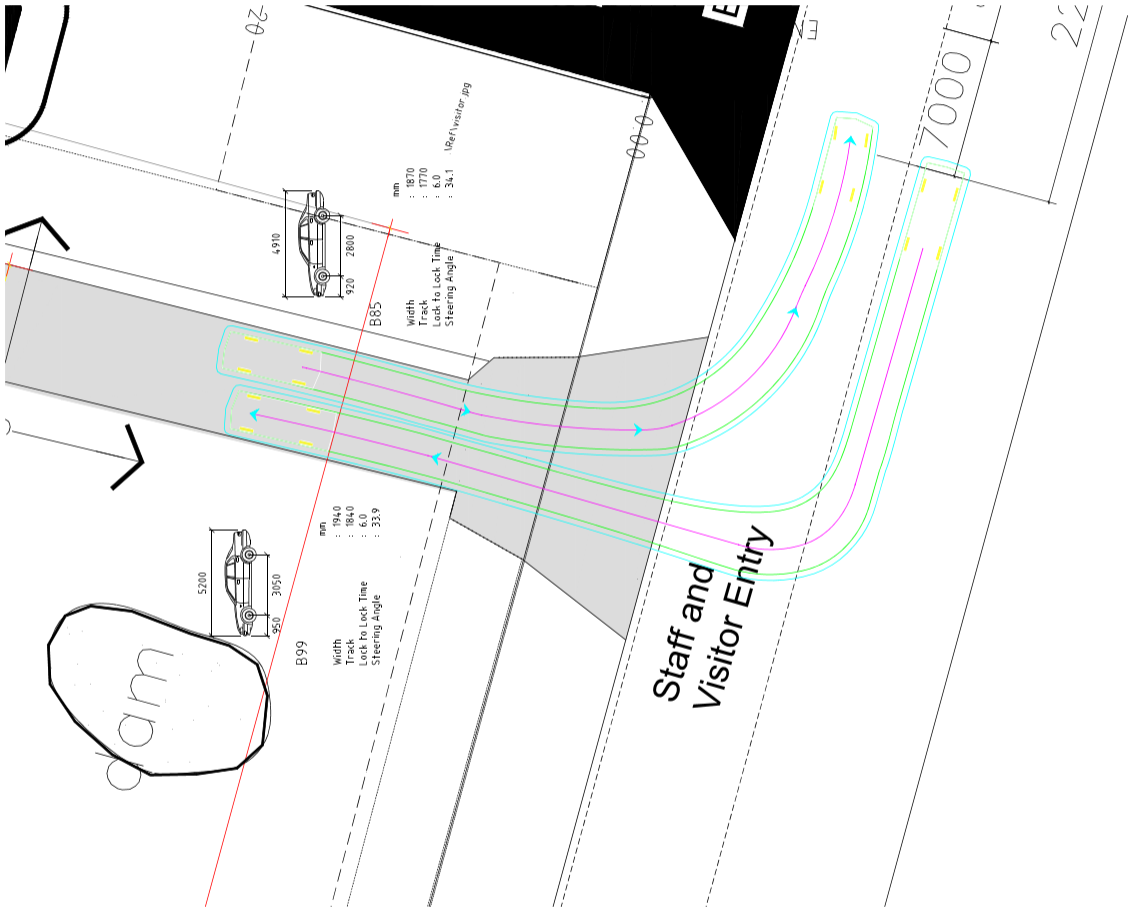
Attachment 1: Vehicle Swept Paths (See Appendix 'B' and Appendix 'C' from Hemanote Consultants Pty Ltd, Traffic & Parking Impact Assessment, May 2026 for all original swept paths)

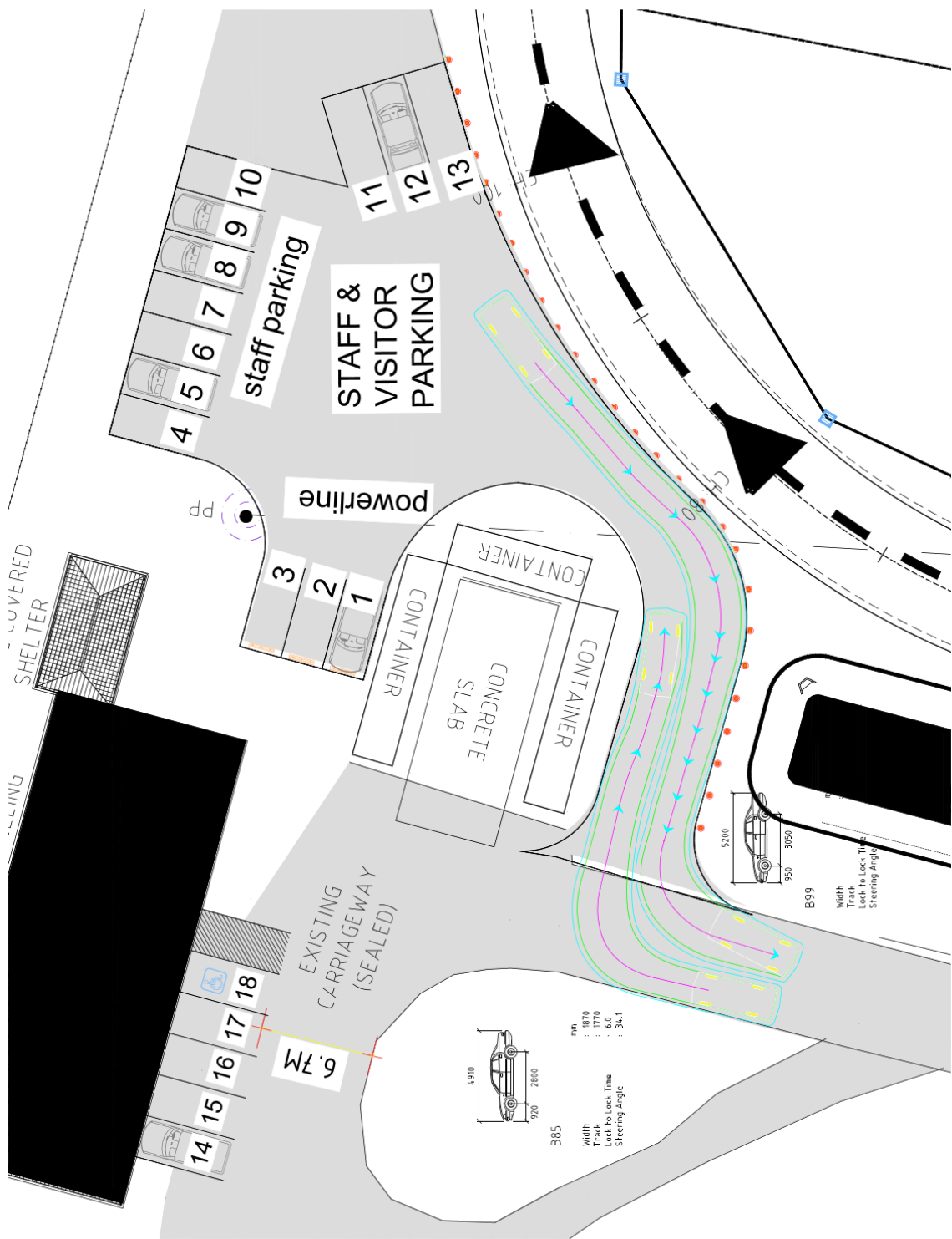


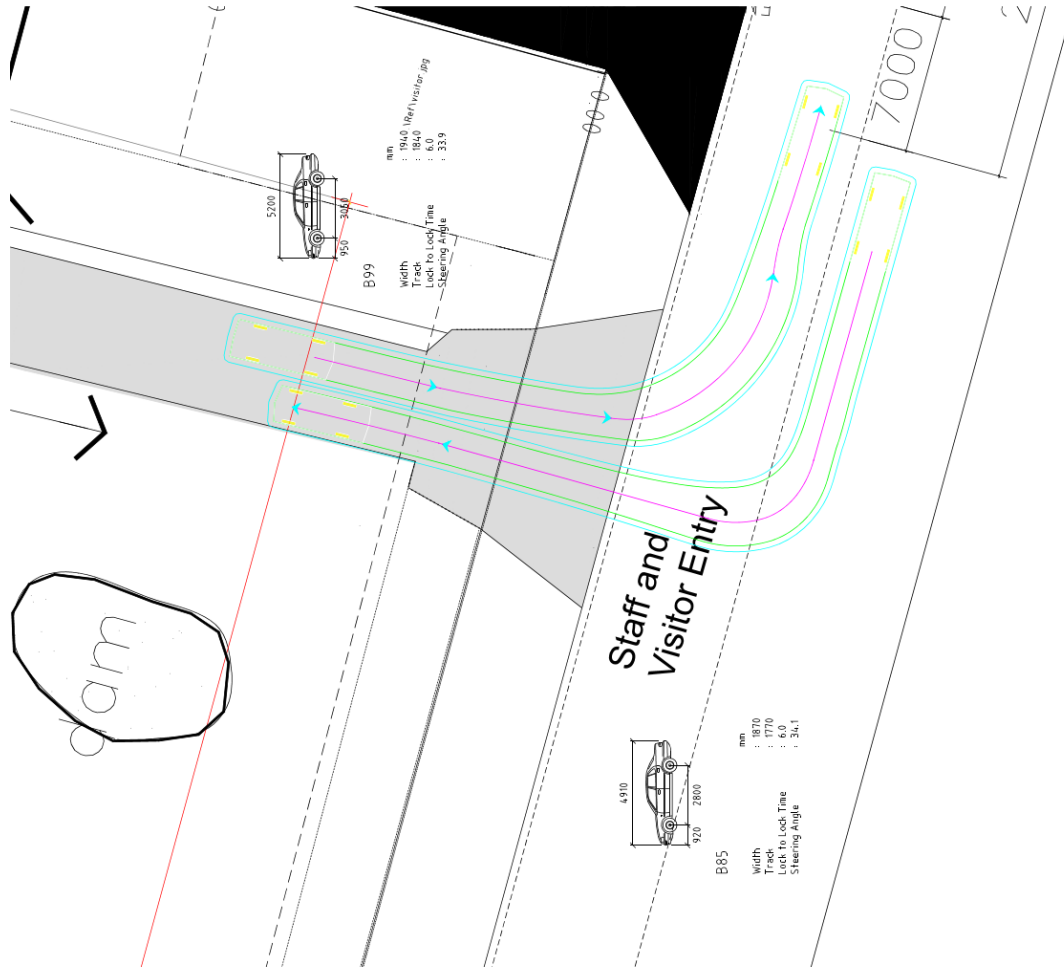


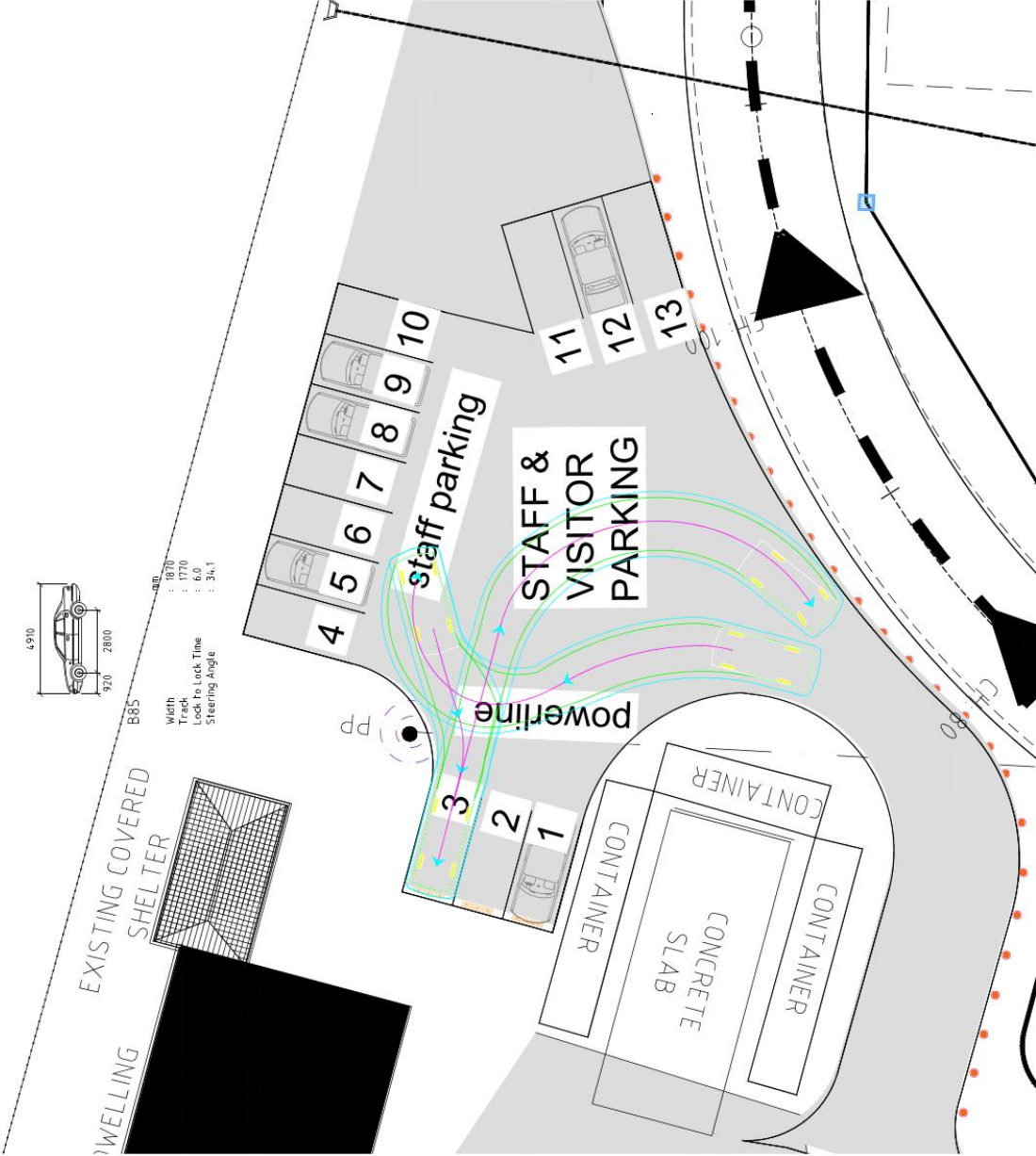


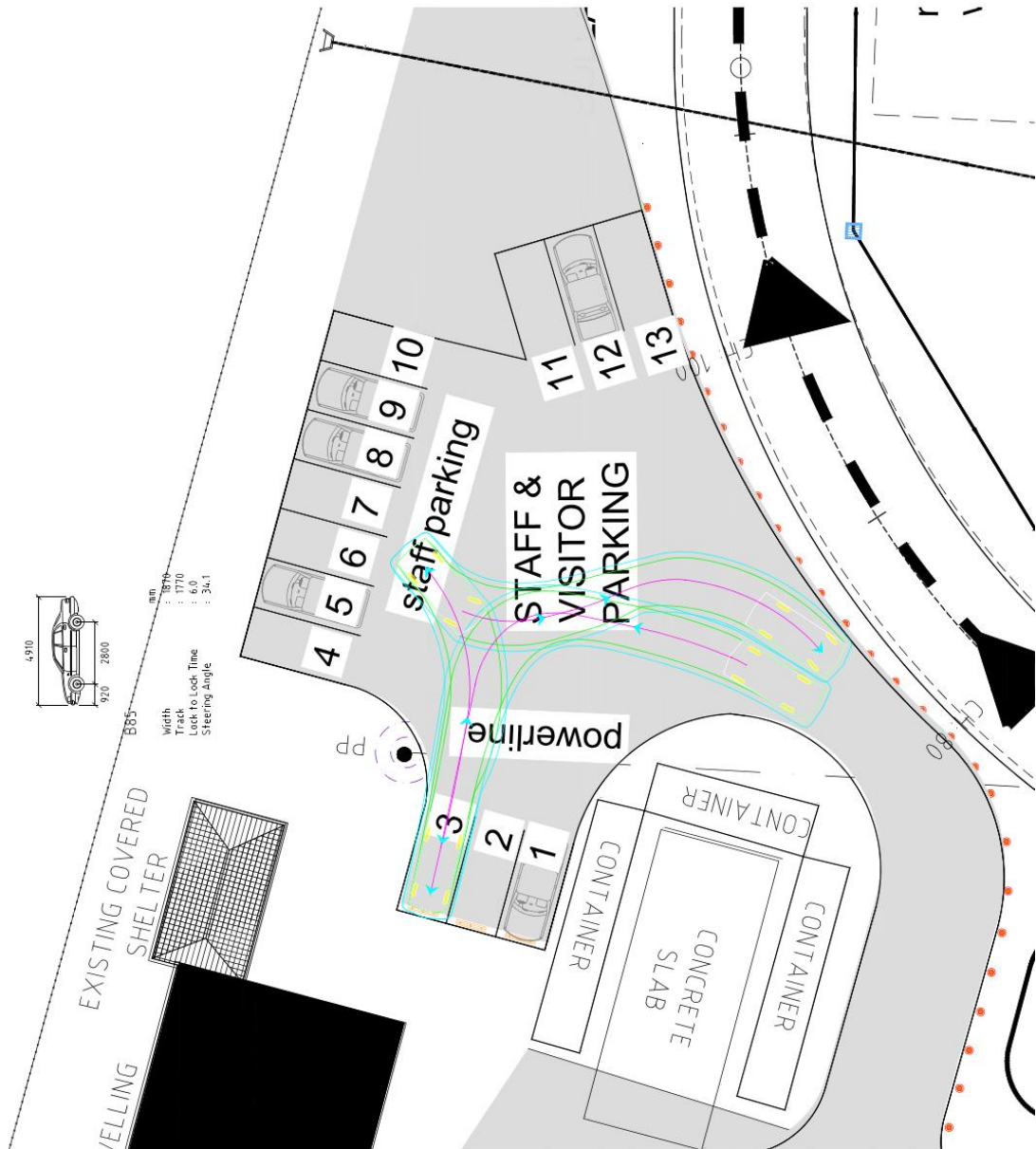


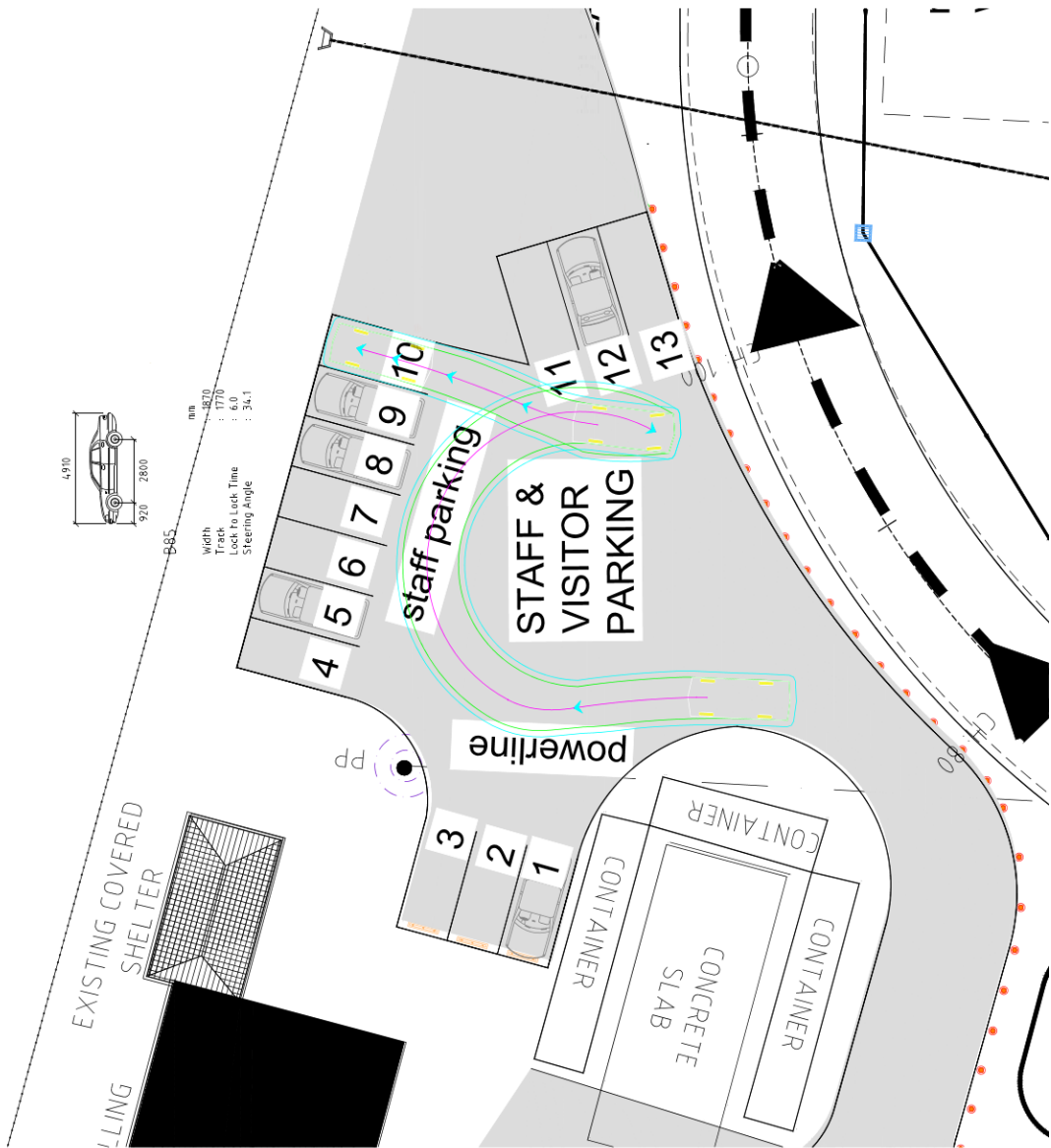


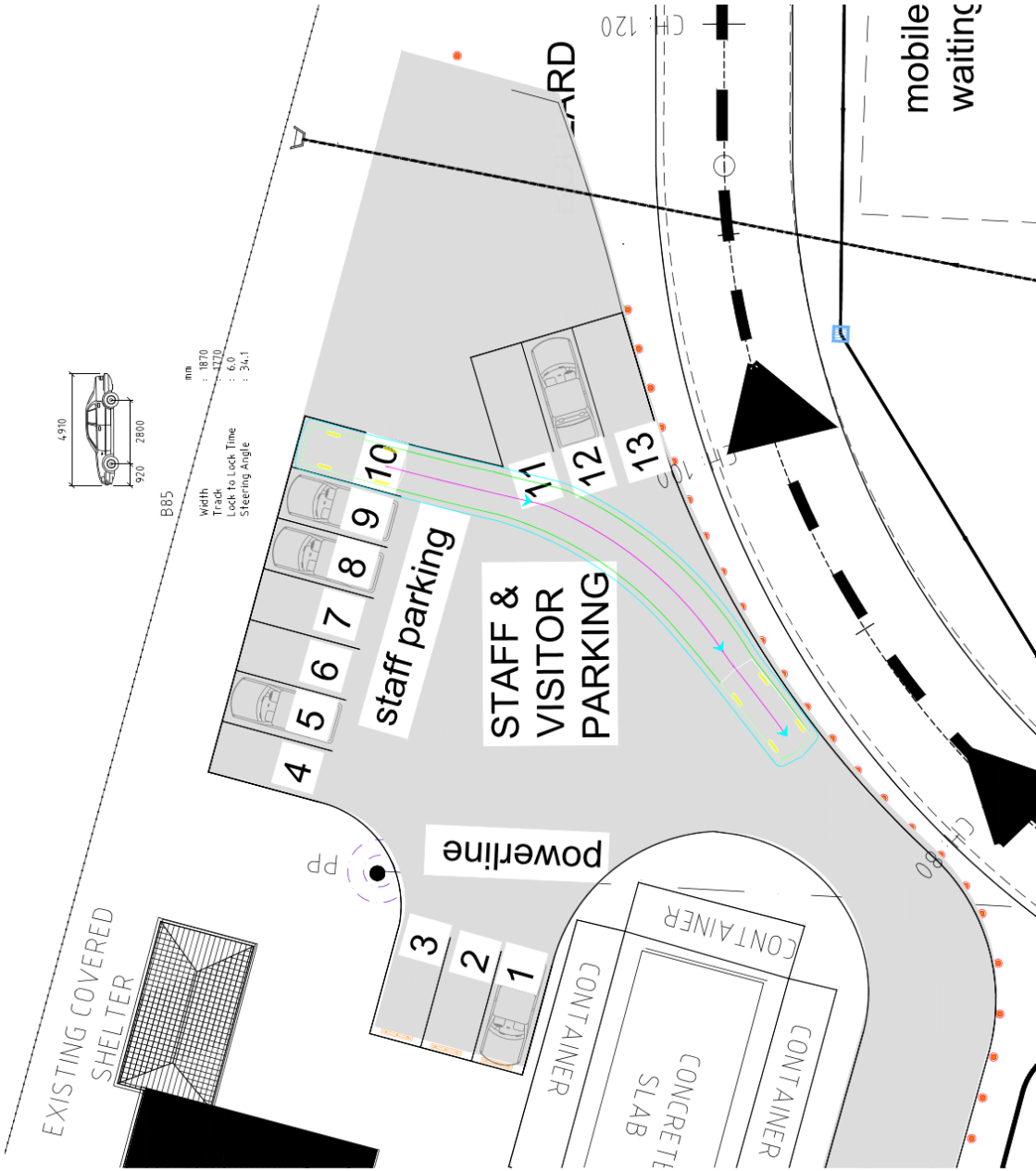


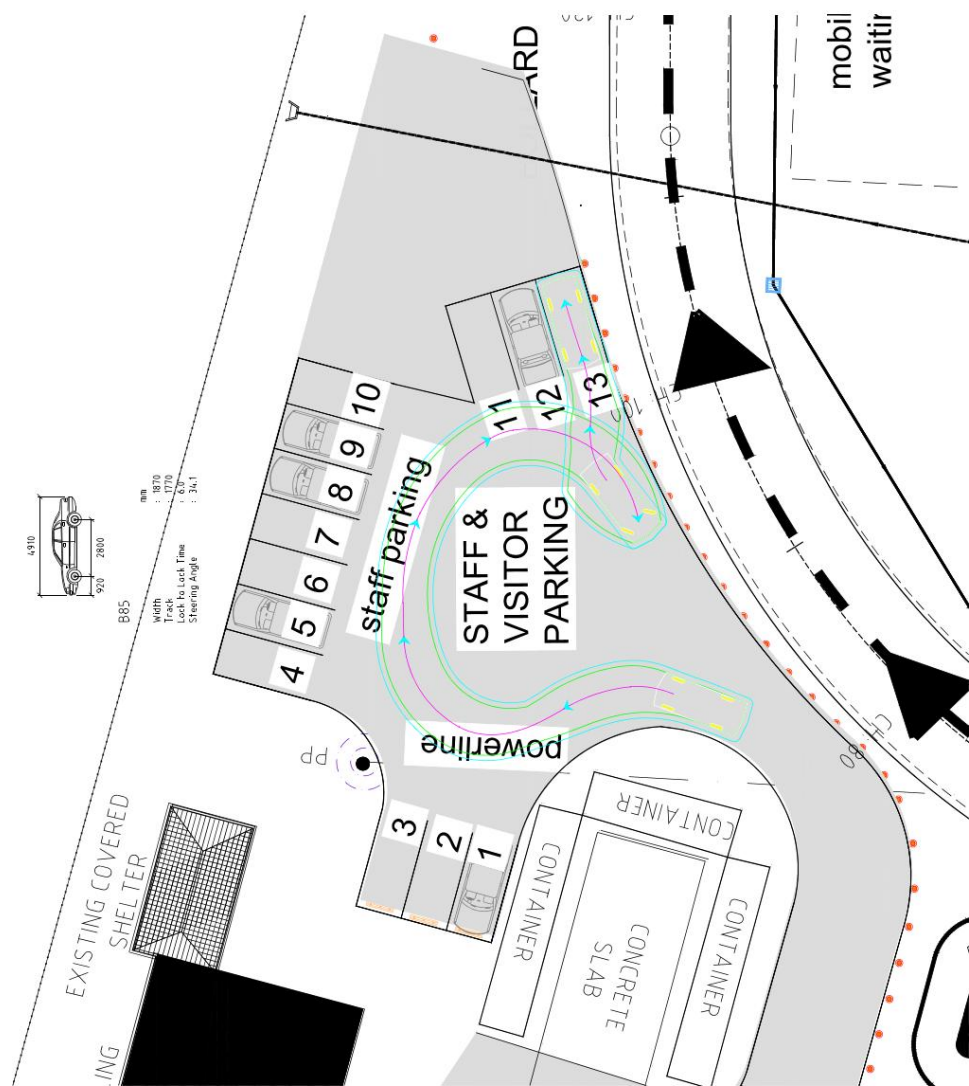




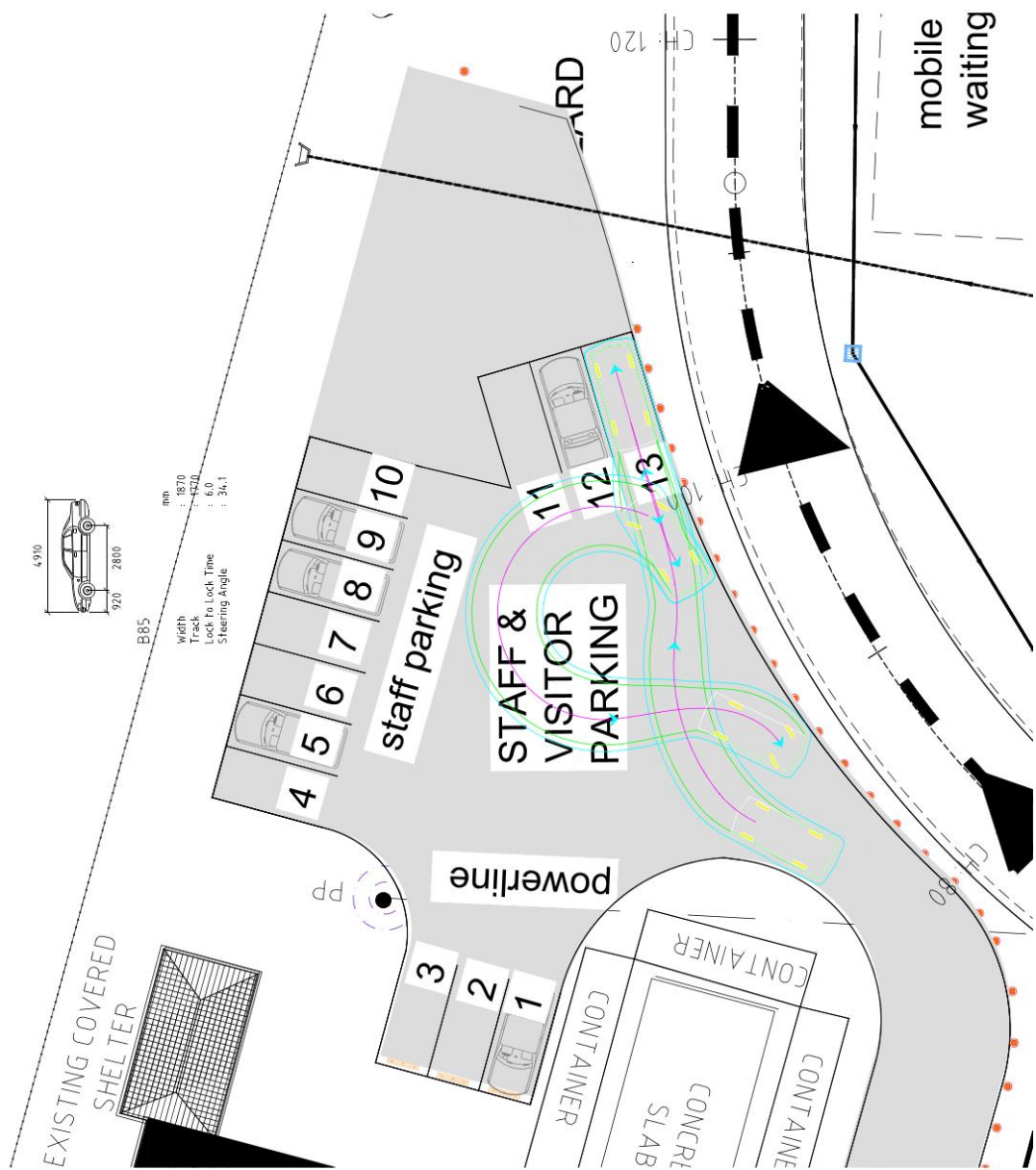


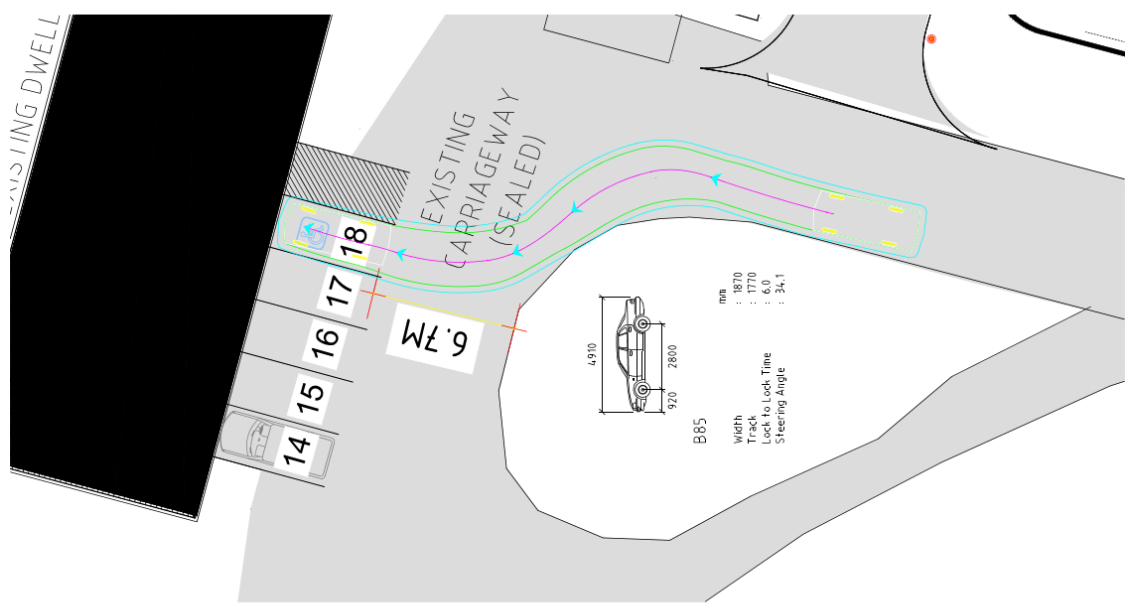


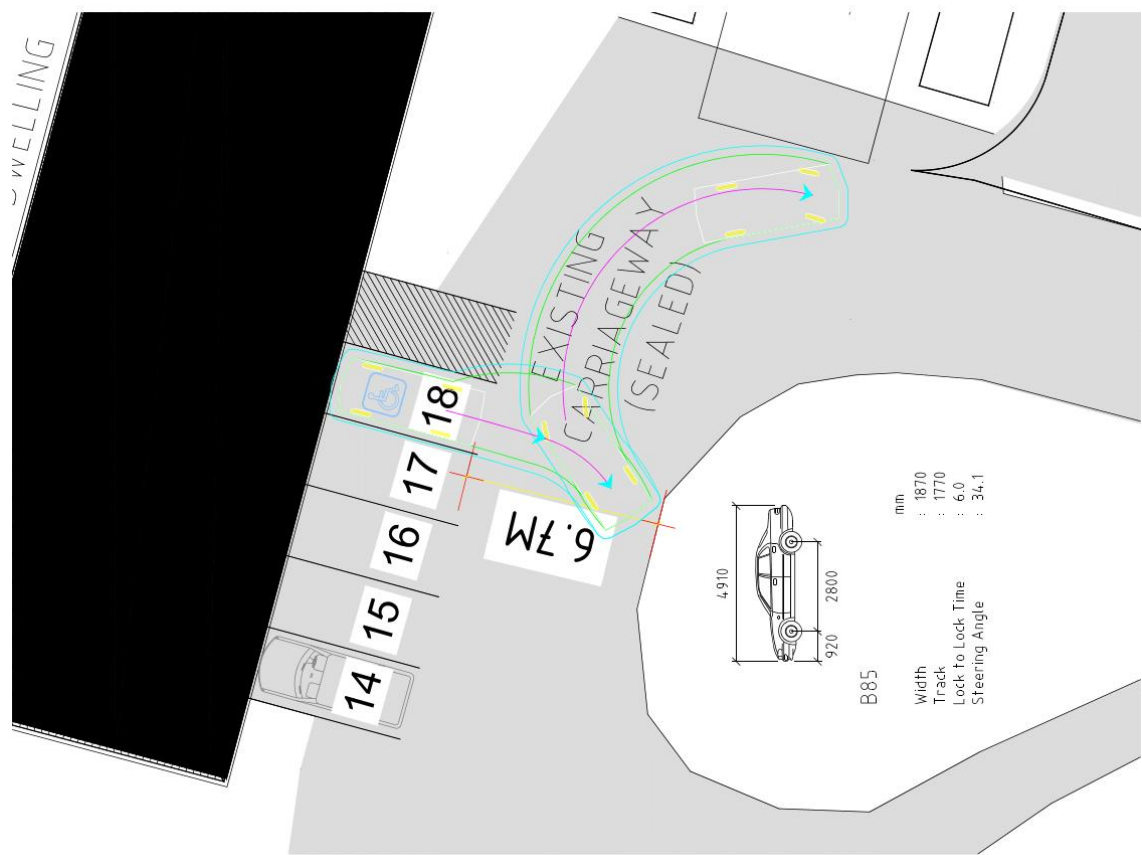


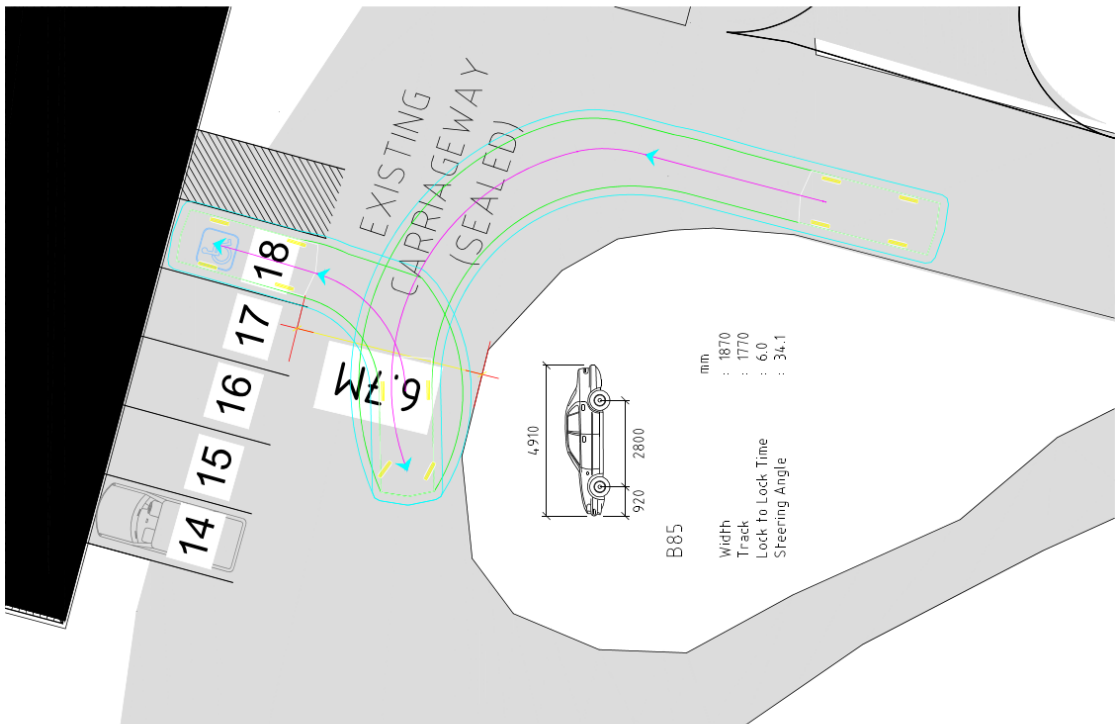


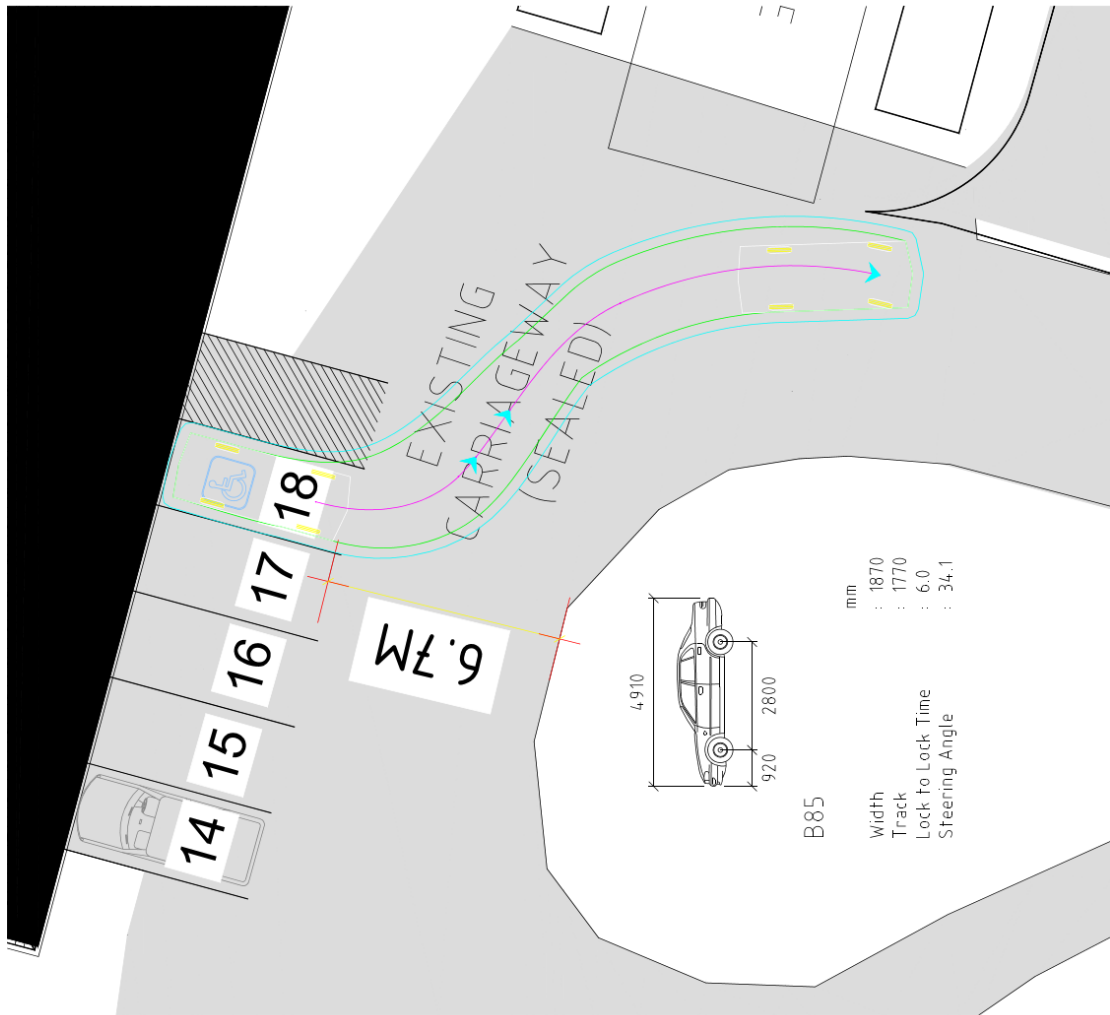












Attachment 2: Haulage Routes (See Appendix 'C' – Traffic Design Plans from Hemanote Consultants Pty Ltd, Traffic & Parking Impact Assessment, May 2026 for all original swept paths)

Vehicle routes have been developed in accordance with the proposed intersection treatments outlined in Section 5 of Traffic and Parking Impact Assessment (May 2026) report. Due to the proposed left-out-only restriction from Murrays Flat Road onto the Hume Highway, vehicle movements are controlled to ensure safe and compliant access to and from the Site. The following summarises the proposed haul routes. Also refer to the MRV or smaller truck haulage route map shown in below Figure 6 below and Trucks larger than MRV haulage route map show in Figure 7.

Vehicle size MRV or smaller (<9m) arriving to the Site from:**From South Region (eastbound on Hume Highway):**

- Travel along the Hume Highway and turn left onto Murrays Flat Road.
- Continue along Murrays Flat Road for approximately 860 metres and turn right into the subject site.

From North Region (westbound on Hume Highway):

- Travel along the Hume Highway and turn right onto Murrays Flat Road.
- Continue along Murrays Flat Road for approximately 860 metres and turn right into the subject site.

Articulated Vehicles (>9m) arriving to the Site from:**From North Region (westbound on Hume Highway):**

- Travel along the Hume Highway and pass the Murrays Flat Road intersection;
- Continue for approximately 12 km to the Hume Highway / Hume Street roundabout;
- Undertake a U-turn at the roundabout to travel eastbound on the Hume Highway;
- Travel approximately 12 km and turn left onto Murrays Flat Road via the upgraded CHL; and
- Continue along Murrays Flat Road for approximately 860 metres and turn right into the subject site.

Vehicle size MRV or smaller (<9m) departing the Site:**Towards North Region (Sydney):**

- Travel along Murrays Flat Road for approximately 860 metres and turn left onto the Hume Highway.
- Continue northbound towards Sydney.

Towards South Region (Goulburn):

- Travel along Murrays Flat Road for approximately 860 metres and turn left onto the Hume Highway.
- Continue for approximately 4.28 kilometres and turn left onto Carrick Road (see Figure 8).
- Travel approximately 212 metres and undertake a left turn onto the road reserve area before turning right back onto Carrick Road.
- Travel approximately 257 metres and turn right onto the Hume Highway.
- Continue southbound towards Goulburn.

Articulated Vehicles departing the Site towards North Region (Sydney):

- Travel along Murrays Flat Road for approximately 860 metres and turn left onto the Hume Highway; and
- Continue northbound towards Sydney.

Refer to the attached truck haulage route map shown in Figure 6 and Figure 7 in the following page.

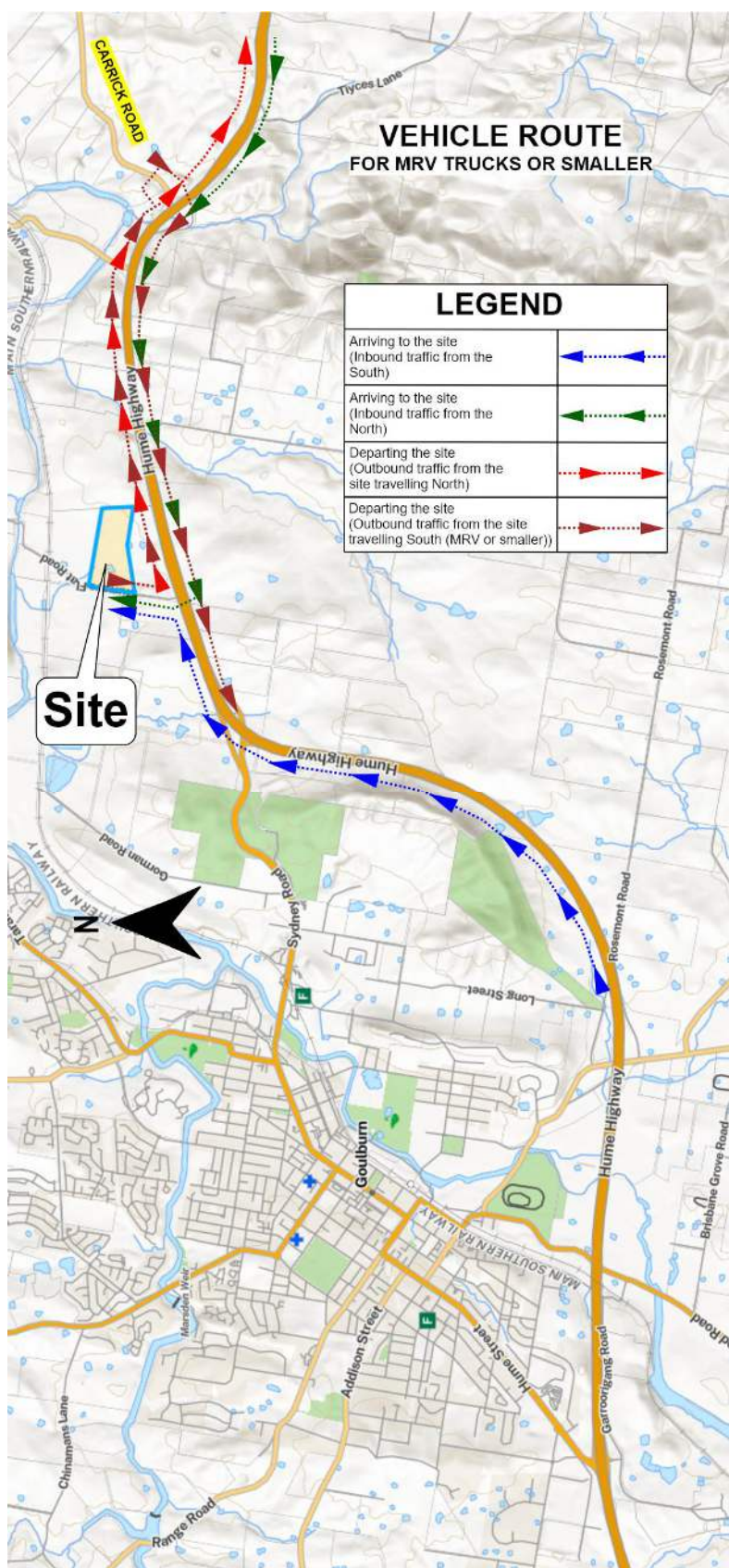
Figure 6. Truck Haulage Route Map for MRV trucks or smaller (source: Hemanote Consultants).

Figure 7. Truck Haulage Route Map for trucks larger than MRV (source: Hemanote Consultants).

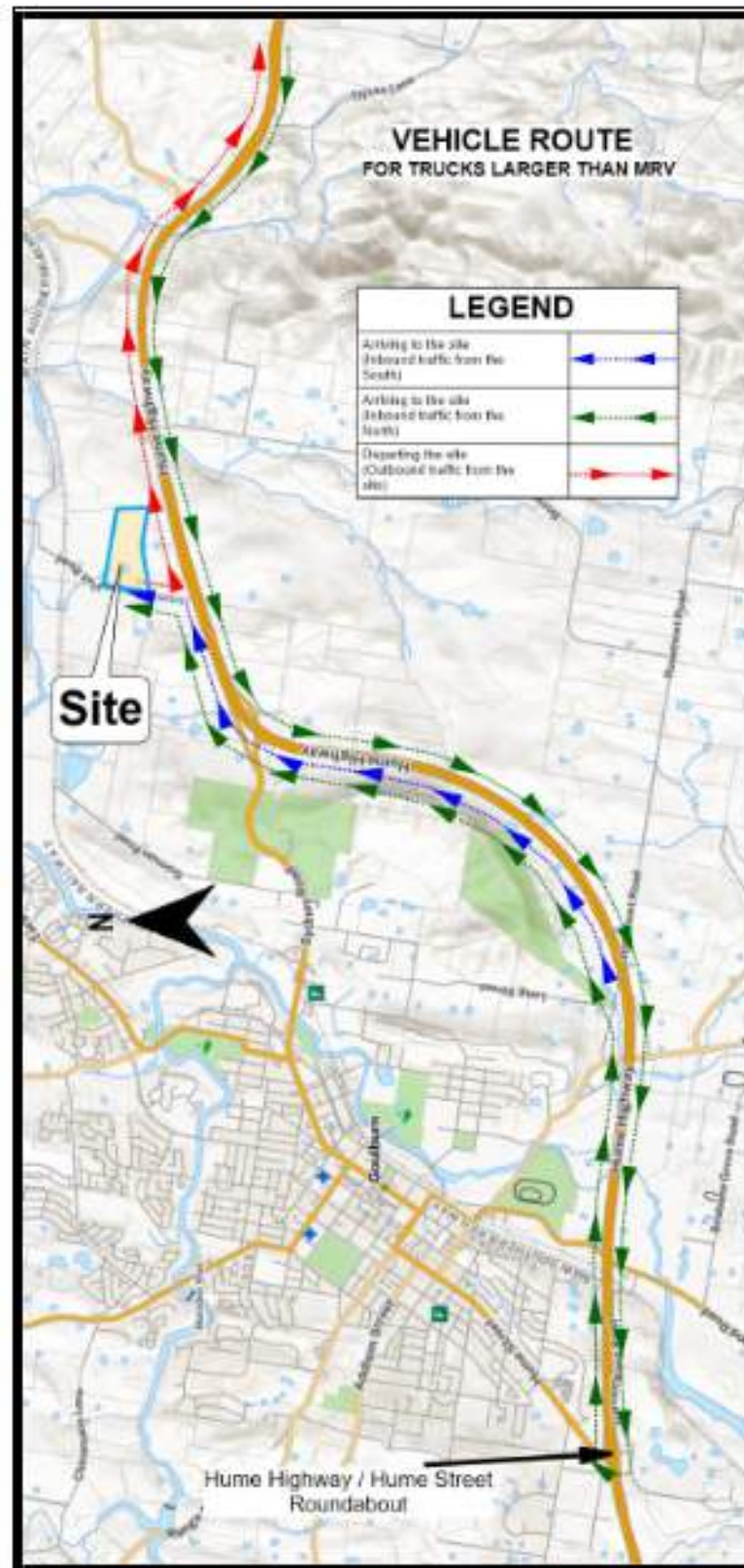


Figure 8. Aerial Map and Swept path of turning area long Carrick Rd (Source: Hemanote Consultants)



Photo 9: Aerial map of Carrick Road and turning area



Attachment 2: Procedure for Dust, Odour and Litter Minimisation

DUST, ODOUR AND LITTER MINIMISATION PROCEDURE

Sydney Metal Traders
Scrap Metal Recycling Facility
88 Murrays Flat Road, Towrang

1. PURPOSE OF THIS PROCEDURE

To ensure that no dust leaves the site



To ensure that no litter escapes the facility



To ensure that odorous waste materials are not received by the facility

2. RESPONSIBLE PERSON

Operations Manager

3. ASSOCIATED INTERNAL DOCUMENTS

Operational Environmental Management Plan

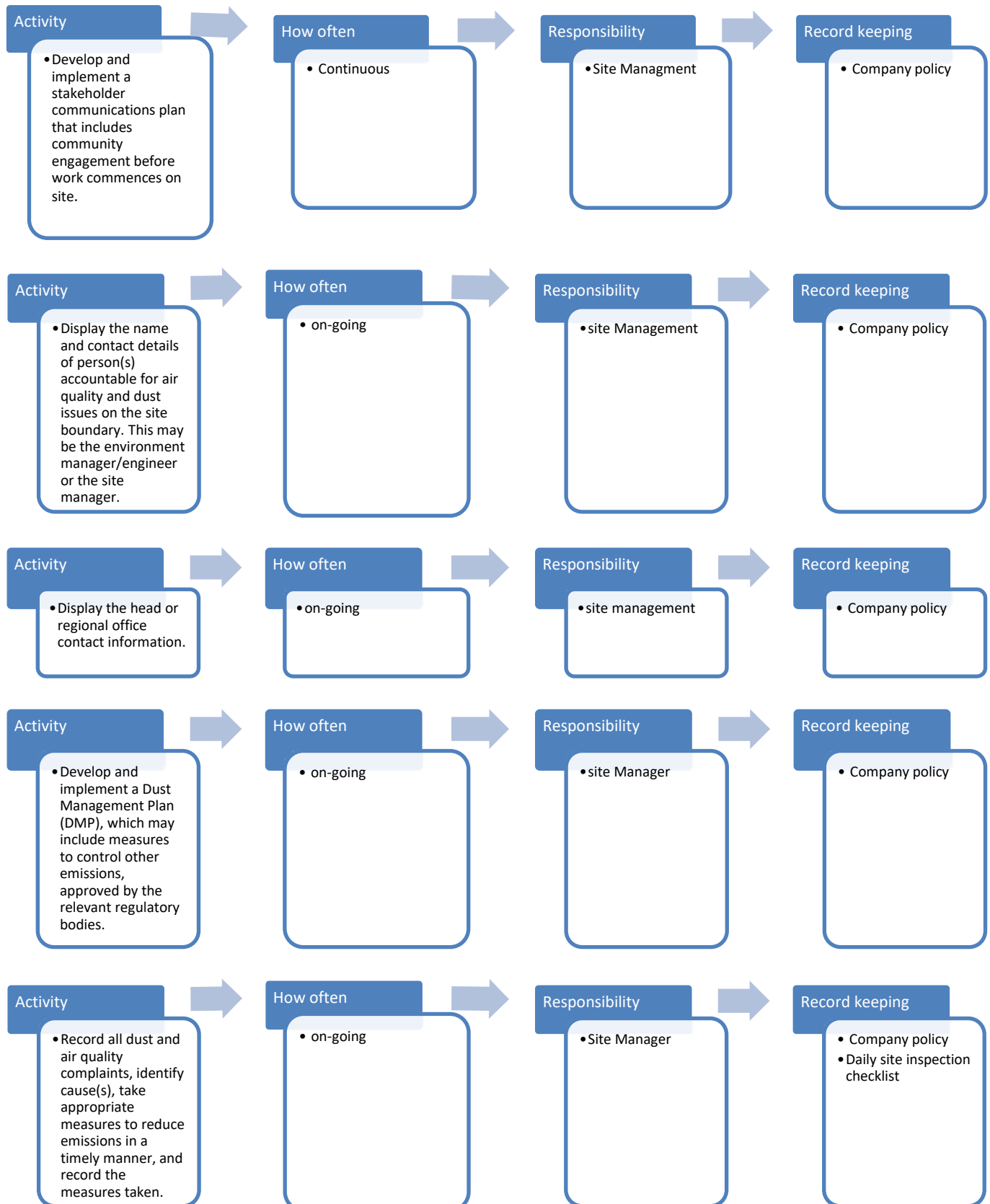


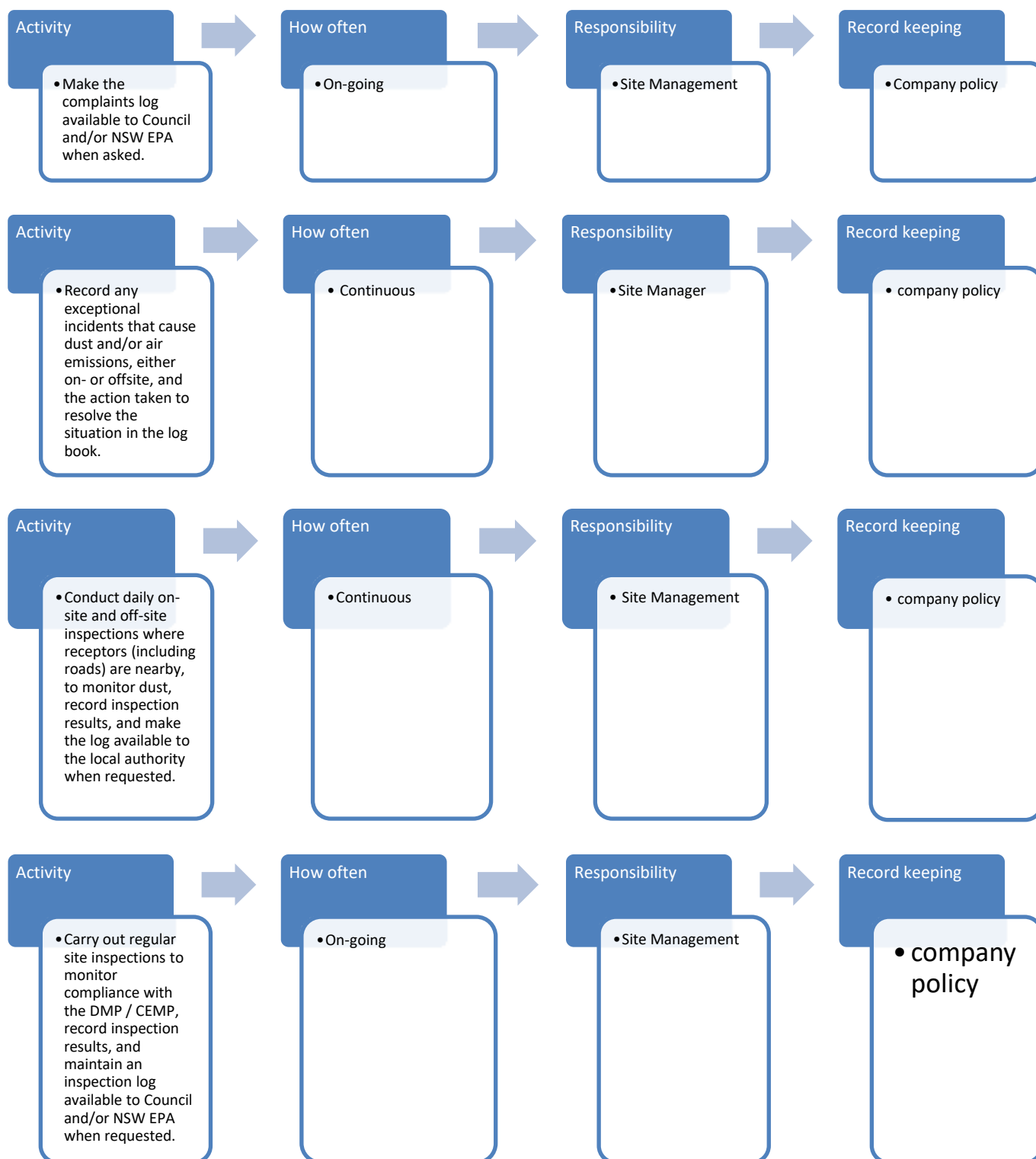
Pollution Incident Response Management Plan

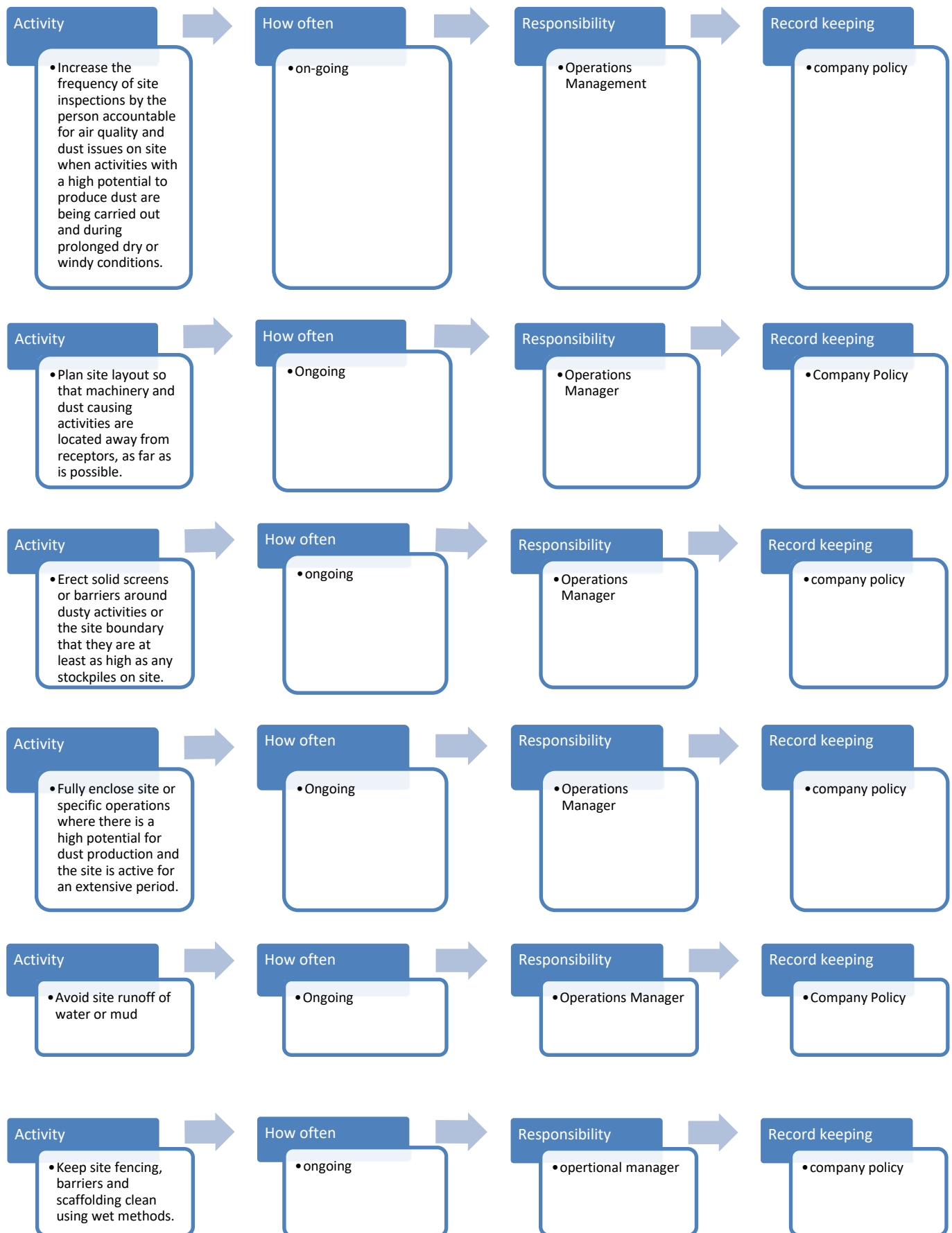
4. EXTERNAL REFERENCE DOCUMENTS

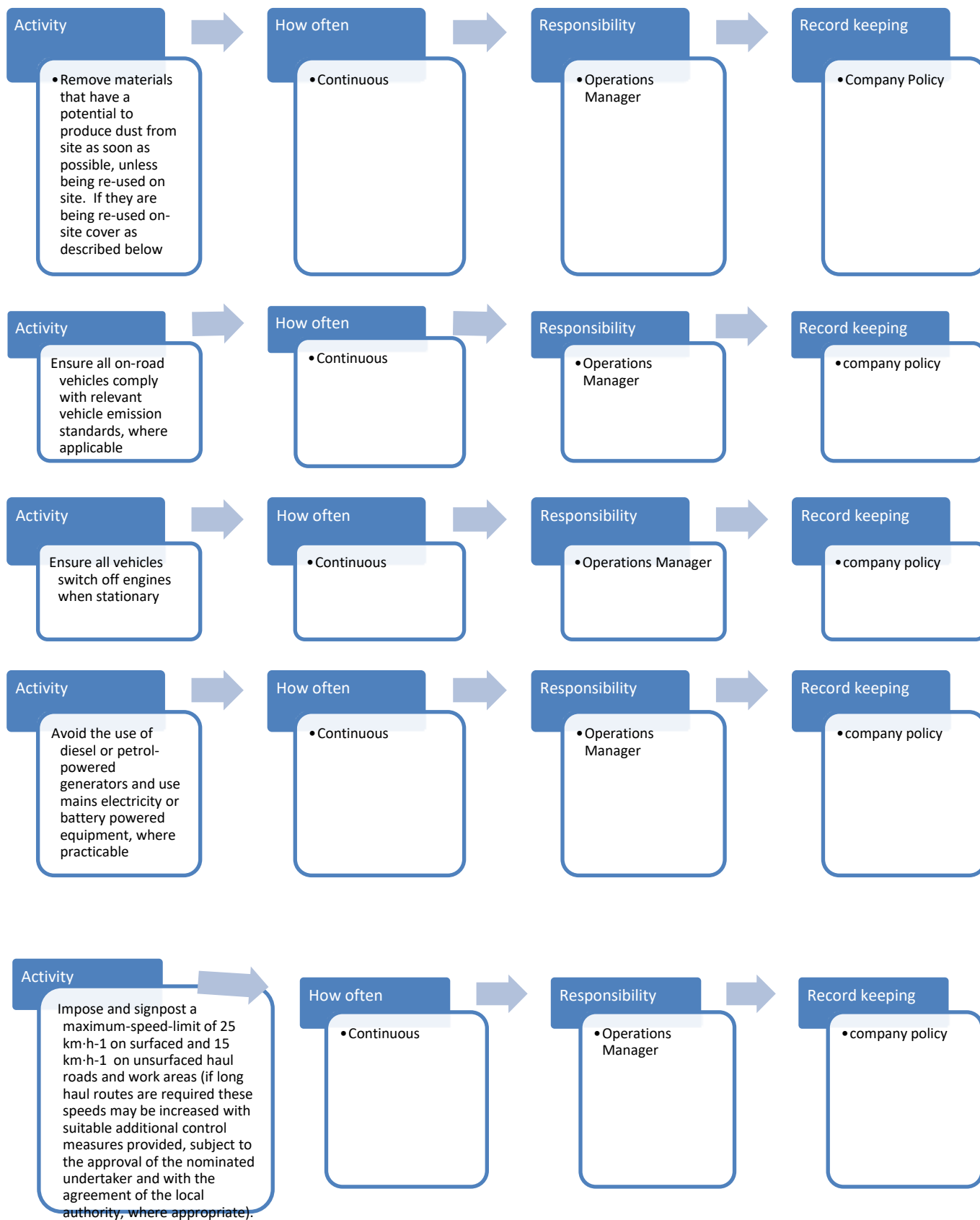
NSW *Protection of the Environment Operations Act 1997*

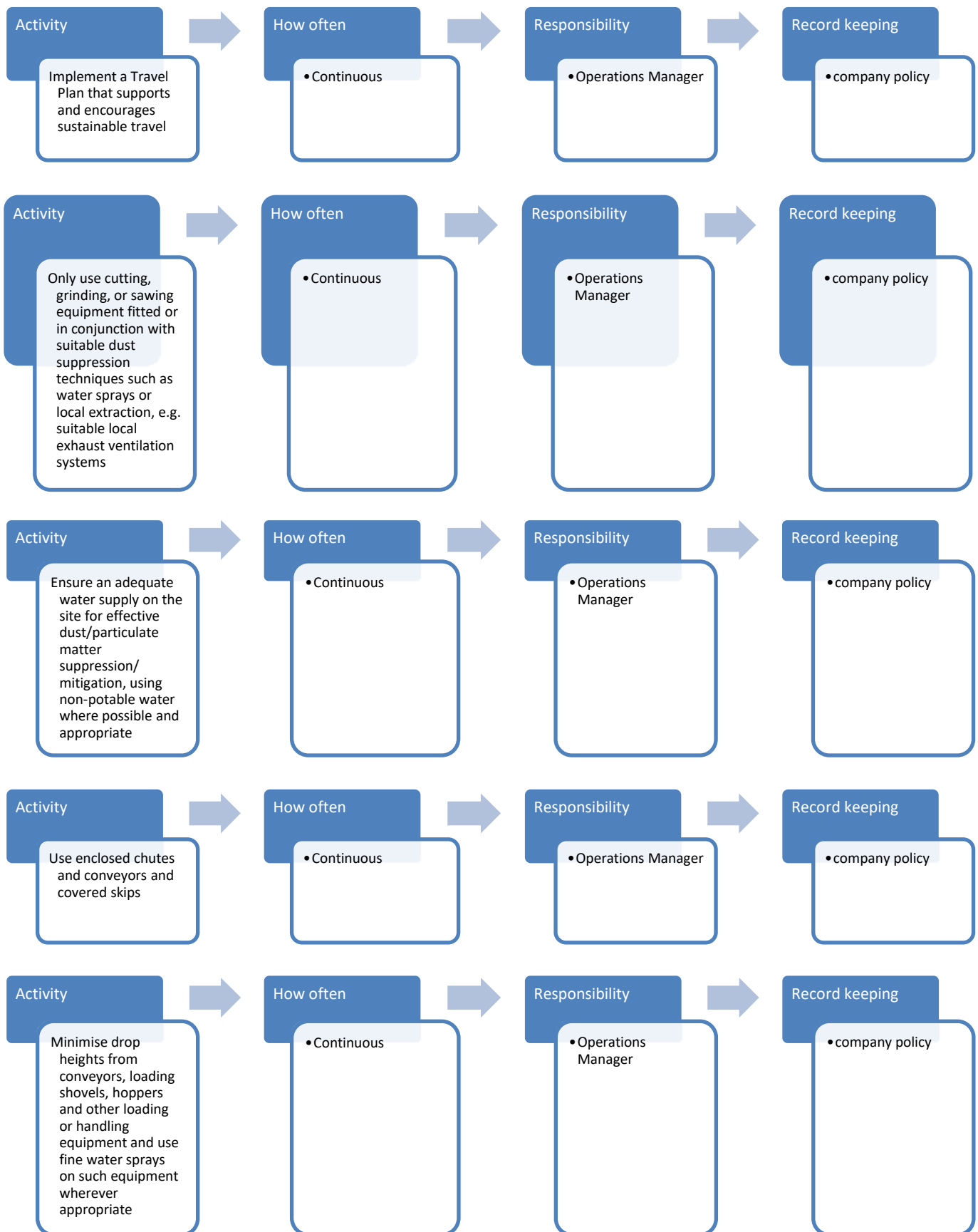
5. PREVENTATIVE MEASURES TO BE UNDERTAKEN

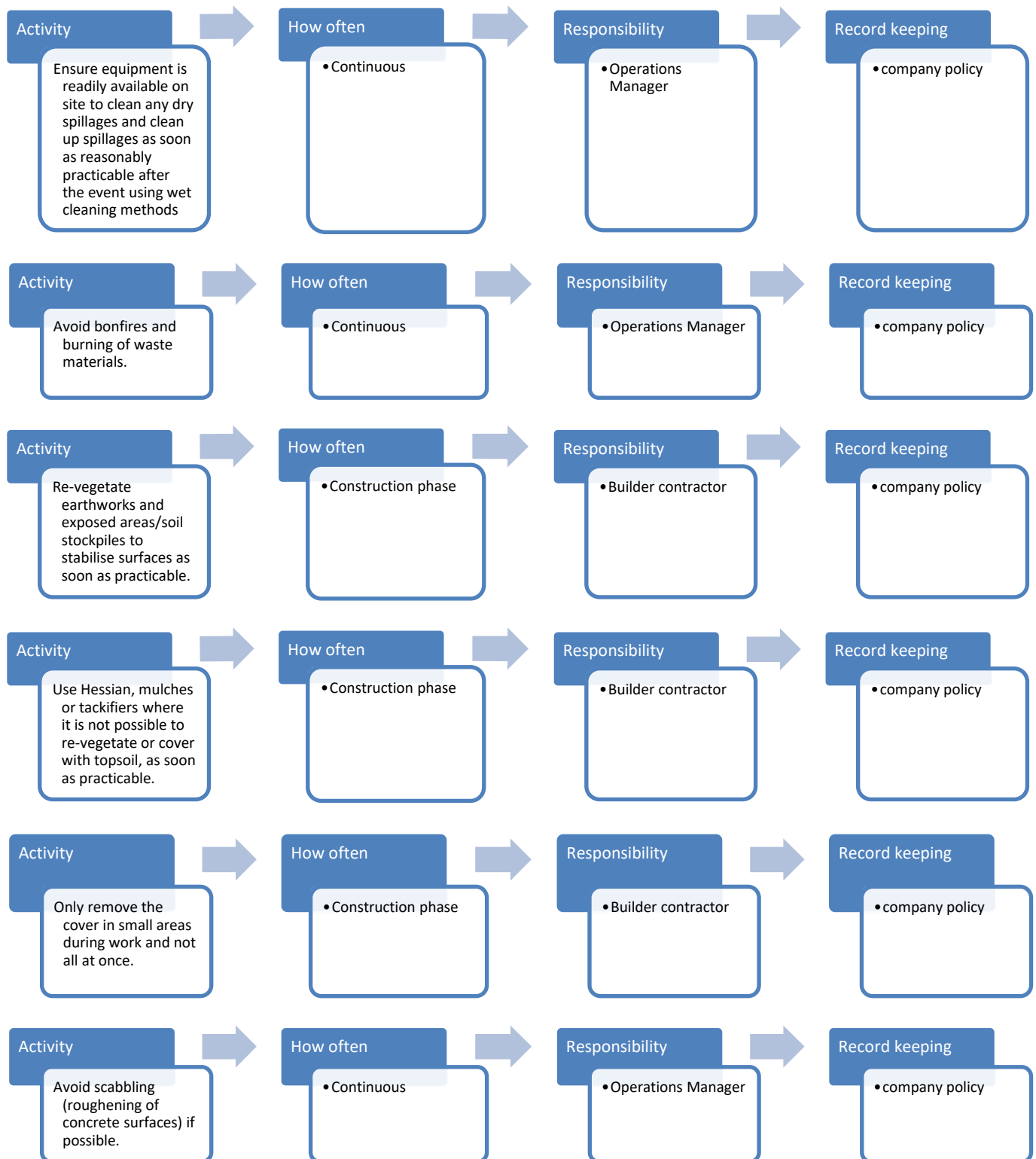


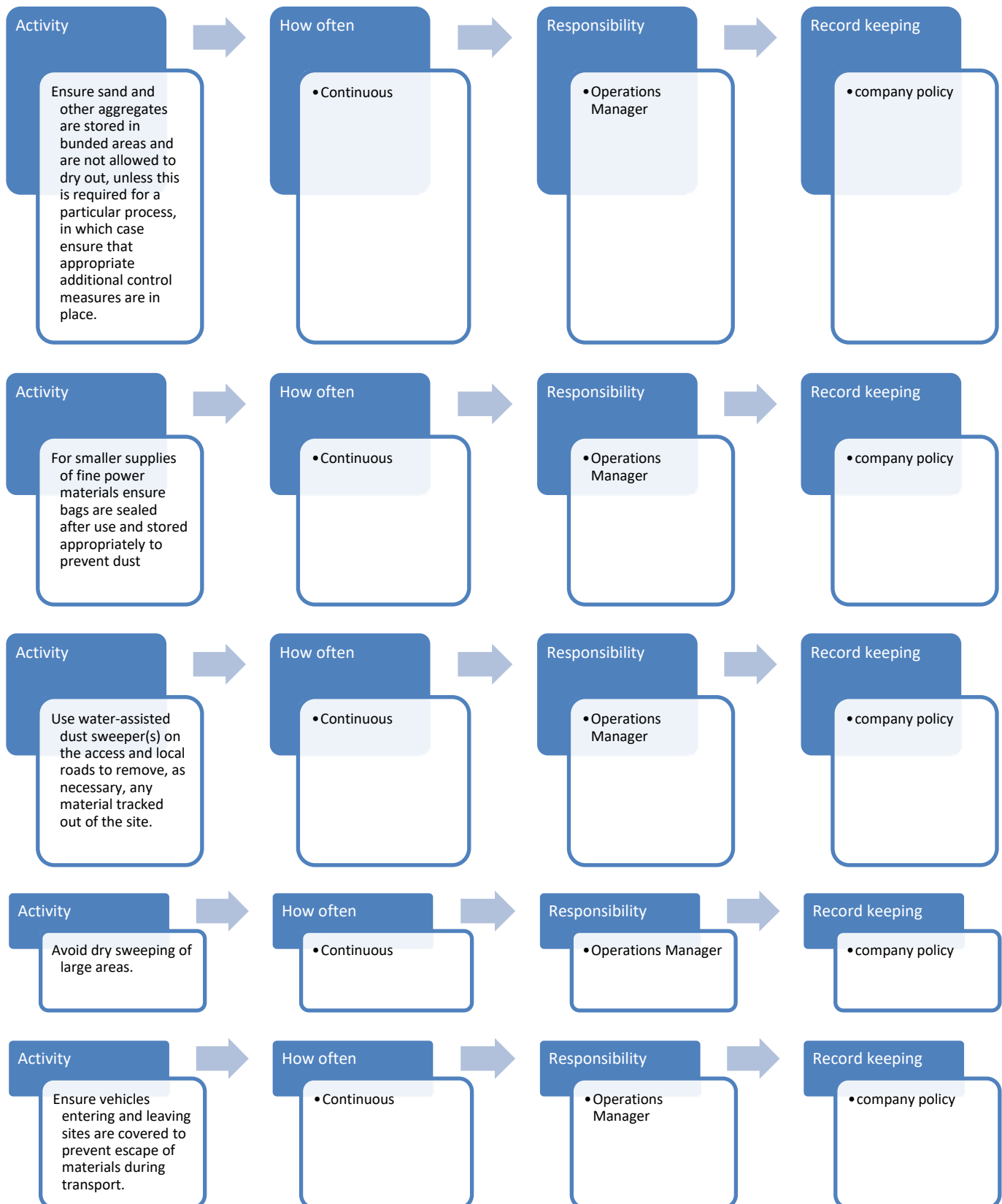


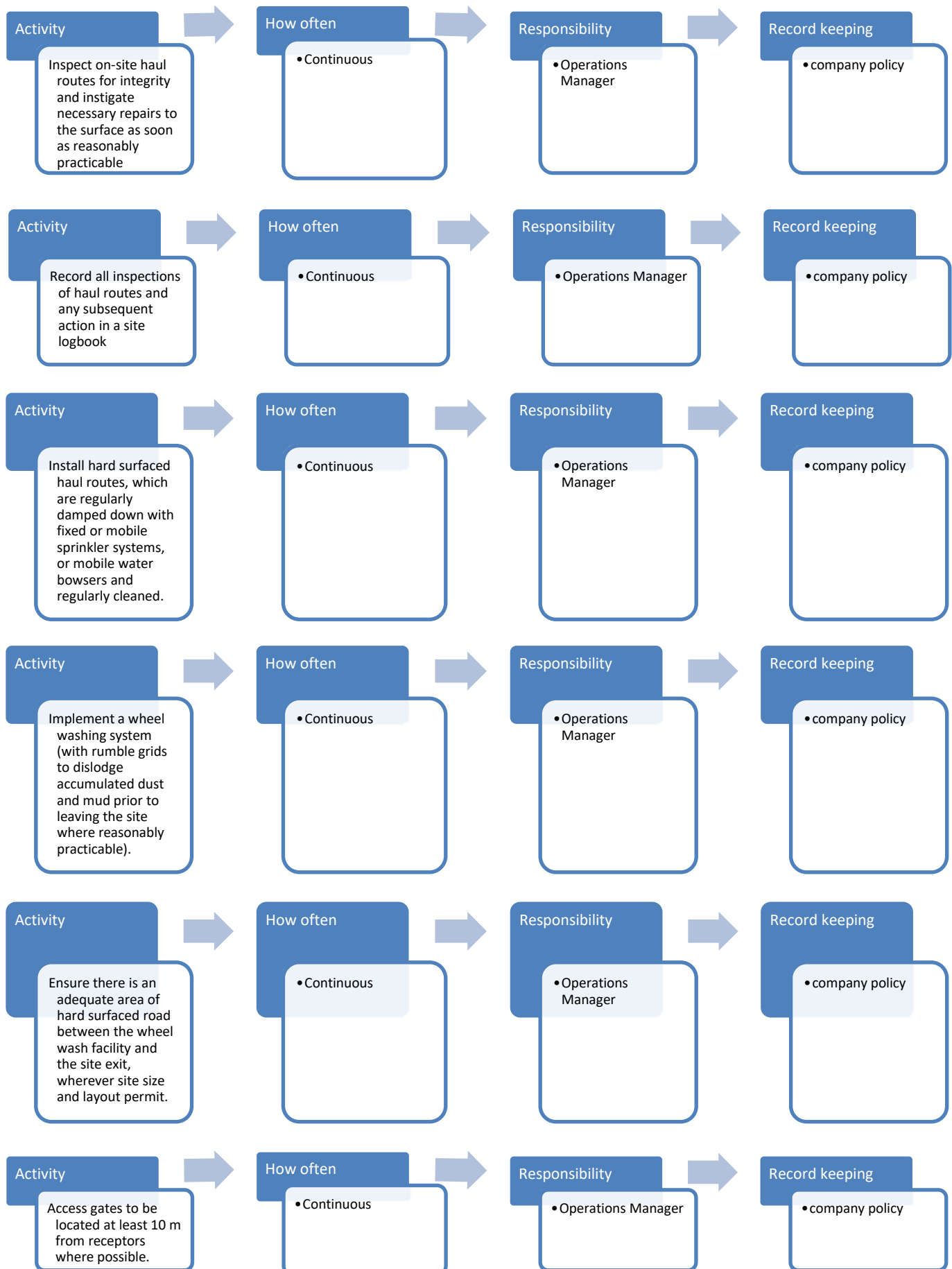




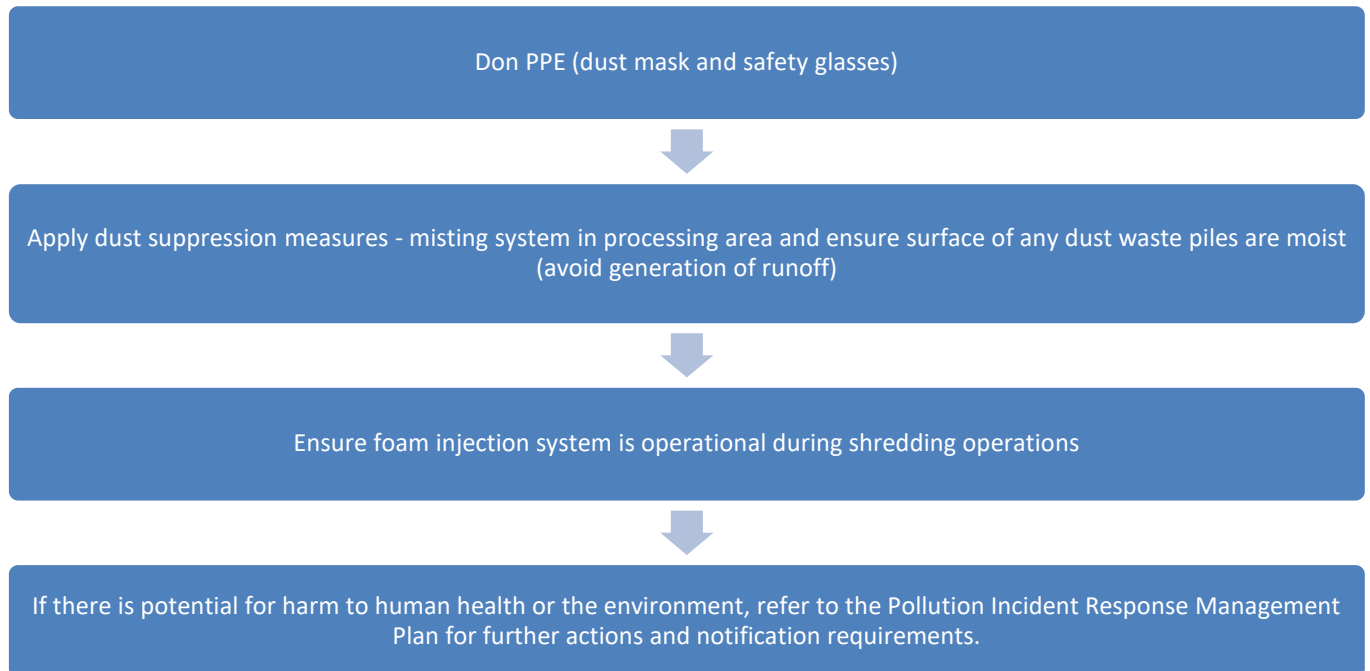




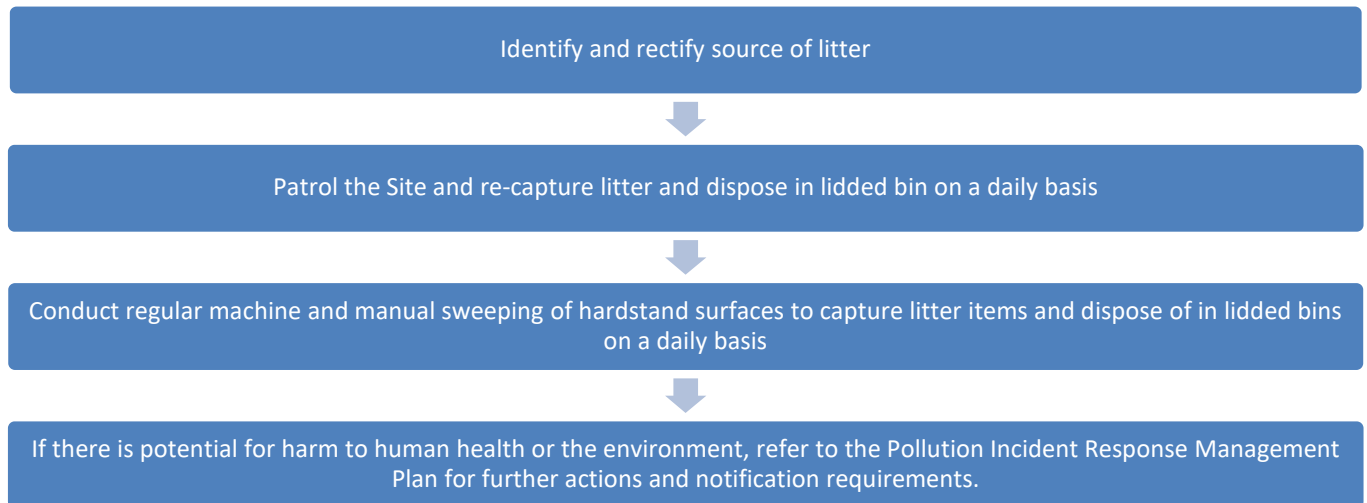




6. STEPS TO TAKE IF DUST IS GENERATED OR IN WINDY WEATHER CONDITIONS



7. STEPS TO TAKE IF LITTER IS GENERATED



Attachment 3: Procedure for Minimising Noise Pollution

NOISE POLLUTION PROCEDURE

Sydney Metal Traders
Scrap Metal Recycling Facility
88 Murrays Flat Road, Towrang

1. PURPOSE OF THIS PROCEDURE

To ensure that noise pollution is minimised on the Site and the facility fully complies with the EPA's *Noise Policy for Industry*

2. RESPONSIBLE PERSON

Operations Manager

3. ASSOCIATED INTERNAL DOCUMENTS

Pollution Incident Response Management Plan



Noise & Vibration Impact Assessment RWDI, 7 February 2025

4. EXTERNAL REFERENCE DOCUMENTS

NSW Protection of the Environment Operations Act 1997
NSW Noise Policy for Industry (NSW EPA, 2017)

5. MAIN NOISE RISKS AT THE SITE

Vehicle movements entering and exiting the Site

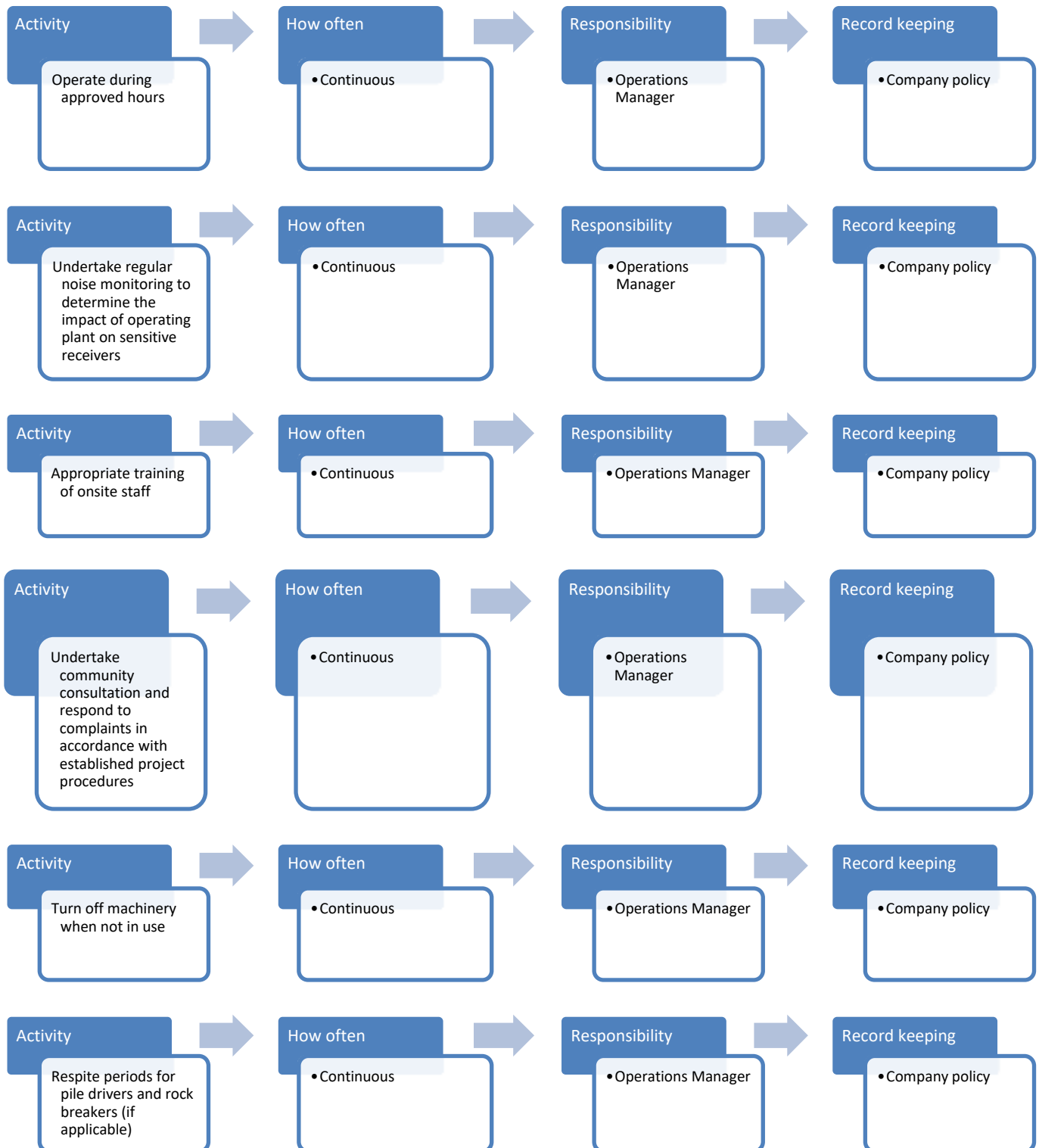


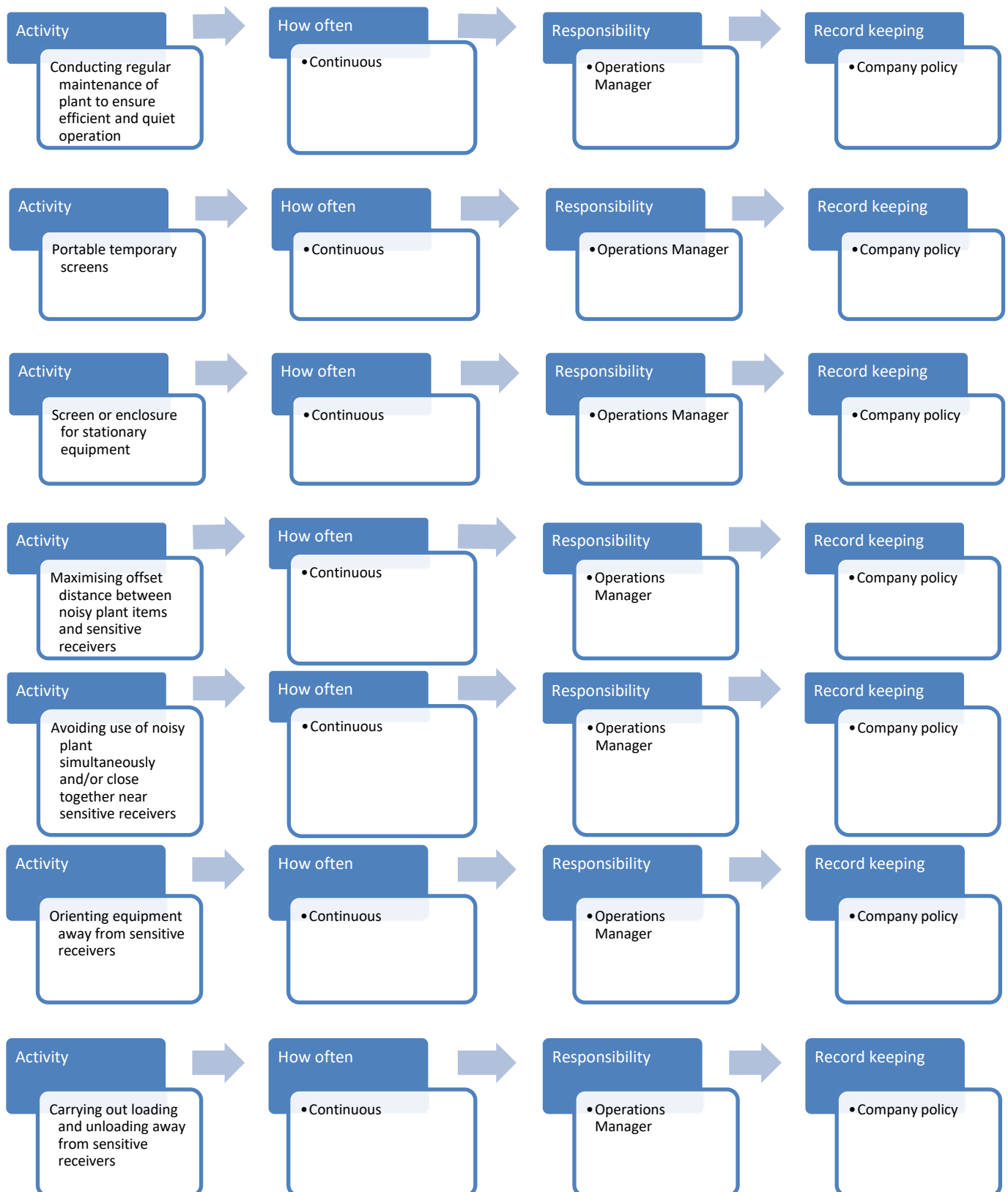
Operational noise generated during operation of the waste sorting and processing plant

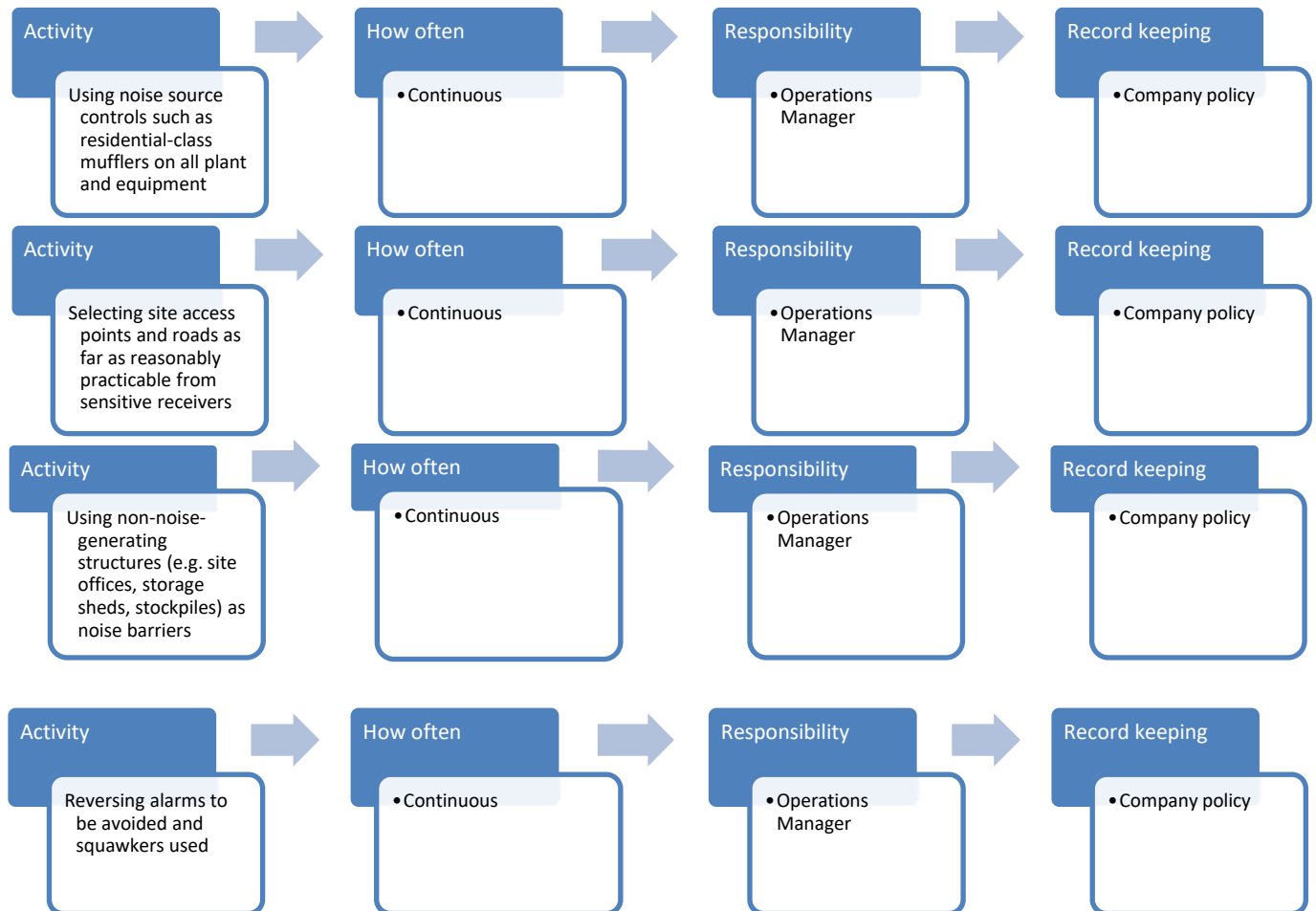


Loading and unloading vehicles

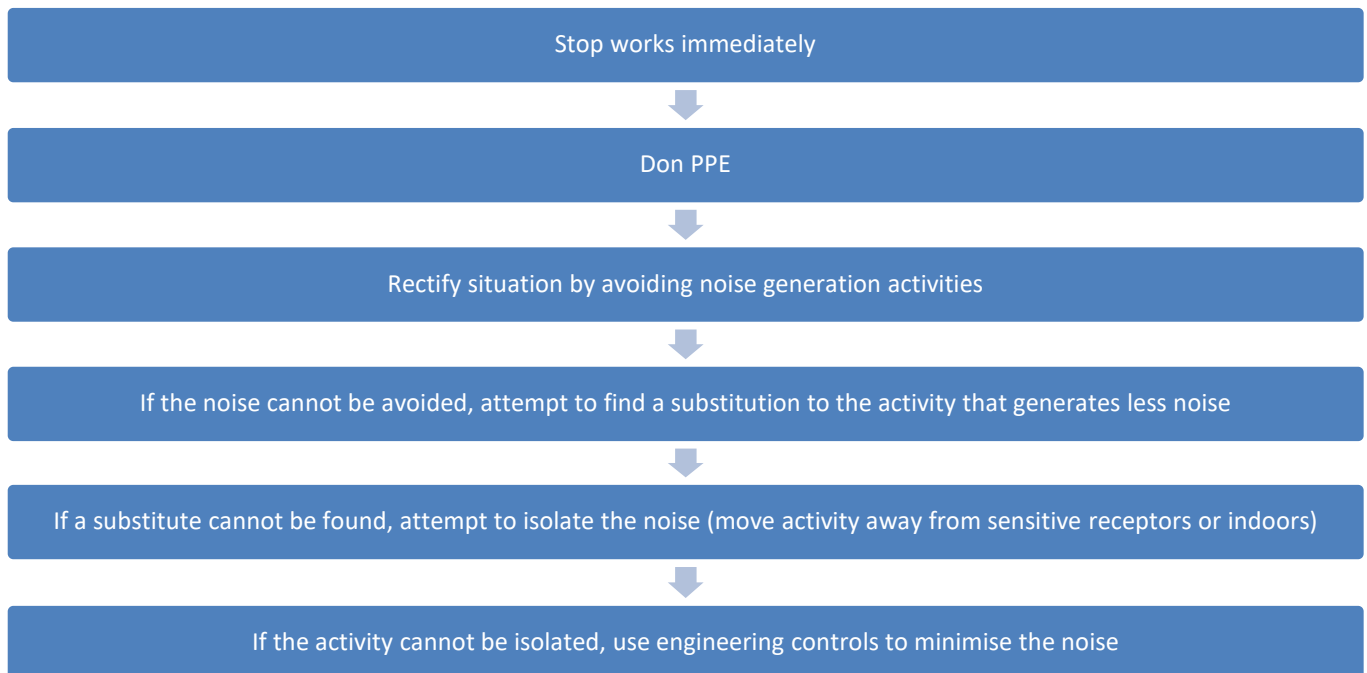
6. PREVENTATIVE MEASURES TO BE UNDERTAKEN







7. STEPS TO TAKE IF EXCESSIVE NOISE IS GENERATED



Attachment 4: Procedure for Non-Conforming Waste

NON-CONFORMING WASTE PROCEDURE

Sydney Metal Traders
Scrap Metal Recycling Facility
88 Murrays Flat Road, Towrang

1. PURPOSE OF THIS PROCEDURE

To ensure that non-conforming waste (waste that does not meet the NSW EPA classification of *General waste – non putrescible*) is not received at the Site



If non-conforming waste is found on the Site, to ensure it is managed in a way that minimises harm to human health and the environment.

2. RESPONSIBLE PERSON

Operations Manager

3. ASSOCIATED INTERNAL DOCUMENTS

Rejected Load Register and Rejected Load Certificate



Asbestos Inspection Register



Pollution Incident Response Management Plan

4. EXTERNAL REFERENCE DOCUMENTS

NSW EPA *Waste Classification Guidelines* 2014



NSW EPA *Draft Protocol for managing asbestos during resource recovery of construction and demolition waste* 2014

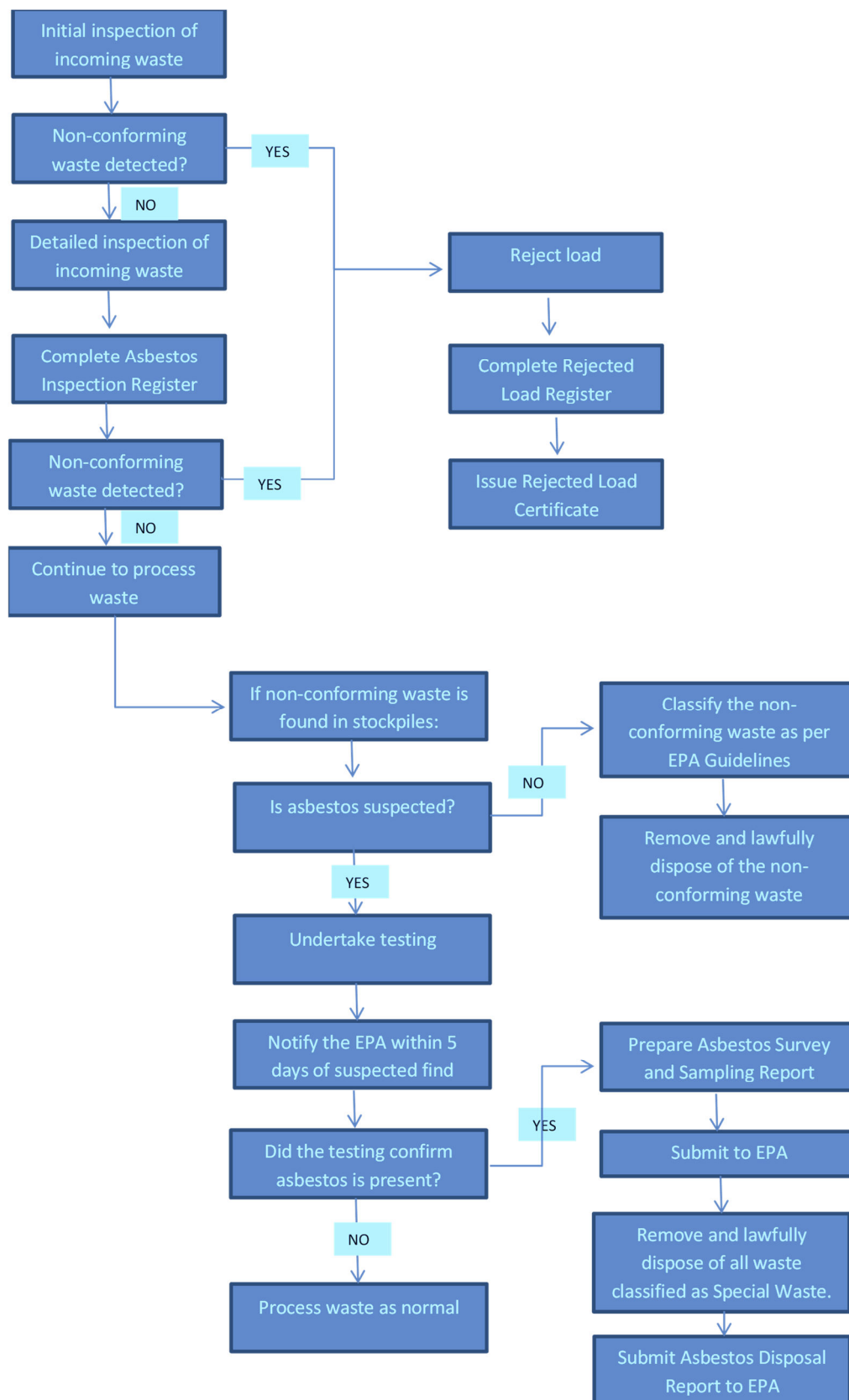


NSW EPA (2018) *Standards for Managing Construction Waste in NSW*



NSW *Protection of the Environment Operations Act* 1997

5. STEPS TO BE UNDERTAKEN FOR ALL INCOMING WASTE LOADS



6. DETAIL OF EACH STEP IN THE PROCEDURE

6.1 Initial inspection of incoming waste

Driver inspects top of load prior to loading on the truck. If non-conforming, or putrescible, waste is identified, transport load directly to appropriate facility for disposal.

When a load arrives at the Site, check the top of the load to see if non-conforming waste is visible. Also check for smell of putrescible waste.

If non-conforming waste is visible or you can smell putrescible waste, reject the load (see *Rejection of non-conforming loads*)

If non-conforming waste is not suspected, allow provisional acceptance of the waste

6.2 Detailed inspection of incoming waste, and Asbestos Inspection Register

Once the waste is tipped and spread to 100mm depth, visually inspect the waste again for non-conforming materials.

If non-conforming waste is visible, reject the whole load (see *Rejection of non-conforming loads* below)

If asbestos is suspected, wet down the load immediately.

For each load that underwent a detailed inspection, fill out the Asbestos Inspection Register.

If non-conforming waste is not suspected, process the waste as normal.

6.3 Rejection of non-conforming loads

Inform driver that load is being rejected due to presence of non-conforming waste.

Record details of the rejected load in the Rejected Load Register.

Issue the driver with a Rejected Load Certificate and keep a copy on file.

6.4 Non-conforming waste suspected in stockpiles

If non-conforming material other than asbestos is found, don appropriate PPE and remove it from the stockpile, to a bunded area if necessary. Arrange lawful disposal based on classification in accordance with EPA Guidelines.



If asbestos is suspected in a stockpile, DO NOT attempt to pick it out either manually or with equipment.



If asbestos is suspected, implement the asbestos testing and notification protocol below.

6.5 Asbestos testing and notification

NOTE: all blue steps must be undertaken by a suitably qualified expert who has previous experience in classifying waste in accordance with the NSW Guidelines.

If asbestos is suspected in a stockpile, visually check the rest of the pile and take digital photographs.



Do not add or remove any waste to or from the stockpile.



Immediately restrict access to the pile by erecting barriers and signage.



Wet down the pile if dust generation is possible.



Notify the EPA on 131 555 that asbestos is suspected in the pile.



If approved by EPA, don PPE (P1 or P2 respirator, gloves, disposable overalls and boot covers) and remove each piece of asbestos contaminated material and one cubic metre of the stockpile surrounding it.



Segregate from the stockpile the 20 cubic metres immediately adjacent to and surrounding each cubic metre removed in the above step.



Move this 20 cubic metres to an area that is not contaminated with asbestos. Divide it into four x 5 cubic metre piles and spread them to a height of no more than 10cm.



Inspect for visible asbestos.



If you can see asbestos, move straight to the next step (Further asbestos testing).



If you cannot see any asbestos, regroup into a 20m³ pile and collect one 10 litre sample. Send it to a NATA accredited laboratory for analysis.



If the lab tests do not detect asbestos, process the stockpile as normal. If the tests detect asbestos, move to the next step (Further asbestos testing).

6.6 Further asbestos testing

NOTE: all blue steps must be undertaken by a suitably qualified expert who has previous experience in classifying waste in accordance with the NSW Guidelines.

If asbestos is found in the above step by visual inspection or by lab analysis, the 40m³ surrounding each 20m³ sampled above must be tested using the same procedures as the above step.



If asbestos is found in the 40m³ tested above, the step must be repeated on more adjacent 40m³ samples until it can be demonstrated that the waste material is free of asbestos.

6.7 Asbestos survey and sampling report

NOTE: all blue steps must be undertaken by a suitably qualified expert who has previous experience in classifying waste in accordance with the NSW Guidelines.

Once sampling and testing are finished, prepare an Asbestos Survey and Sampling Report.



Include a volumetric survey of the pile, indicating observed locations of asbestos.



Include all digital photographs taken.



Include details of all waste sources, and the name and contact details of known or possible generators and transporters of the waste in the pile.



Include details of any blending, processing or movement of the waste in the pile.



Include contact details of anyone who may have received waste from the pile



Include details of how the waste has been sampled.



Include waste classification reports and amount in m³ and tonnes of each waste type identified in the pile.



Include the current locations of the separated contaminated waste and other waste.



Include a proposed timeline for removal of the contaminated waste.



Include a list of steps that will be taken to minimise future risk of asbestos contamination in stockpiles.



Submit the report to the EPA.

6.8 Removal of asbestos-contaminated waste

Once permission is granted by the EPA, arrange for lawful transport and disposal of all waste now classified as Special Waste (and any other waste identified to be removed) by trained personnel in accordance with the timelines in the Asbestos survey and sampling report.

6.9 Asbestos Disposal Report

Prepare an Asbestos Disposal Report



Include a signed, dated statement from Site Representative saying that you complied with the requirements of the *NSW Draft Protocol for Managing Asbestos During Resource Recovery of Construction and Demolition Waste*.



Include all the weighbridge dockets showing that the Special Waste (and any other waste required to be removed) was disposed to a facility that can lawfully receive it.



Include a signed and dated statement from the landfill that received the waste, confirming dates of receipt of waste, amounts received each day, and total amount received.



Provide the report to the EPA within 7 days of final disposal of Special Waste, or if removal takes more than a month, within 7 days after every month that waste is being disposed.

Attachment 5: Procedure for Stormwater Pollution Prevention

STORMWATER POLLUTION PREVENTION PROCEDURE

Sydney Metal Traders
Scrap Metal Recycling Facility
88 Murrays Flat Road, Towrang

1. PURPOSE OF THIS PROCEDURE

To ensure that the stormwater system functions effectively



To ensure that the quality of receiving watercourses and rivers is not impacted by stormwater from the Site.

2. WHAT IS STORMWATER?

Stormwater is rainwater that flows across surfaces into stormwater drains and then directly into waterways.

3. RESPONSIBLE PERSON

Operations Manager

4. ASSOCIATED INTERNAL DOCUMENTS

Pollution Incident Response Management Plan



Dust, odour and litter minimisation procedure



Water Cycle Impacts Report SOWDES 1.10.25

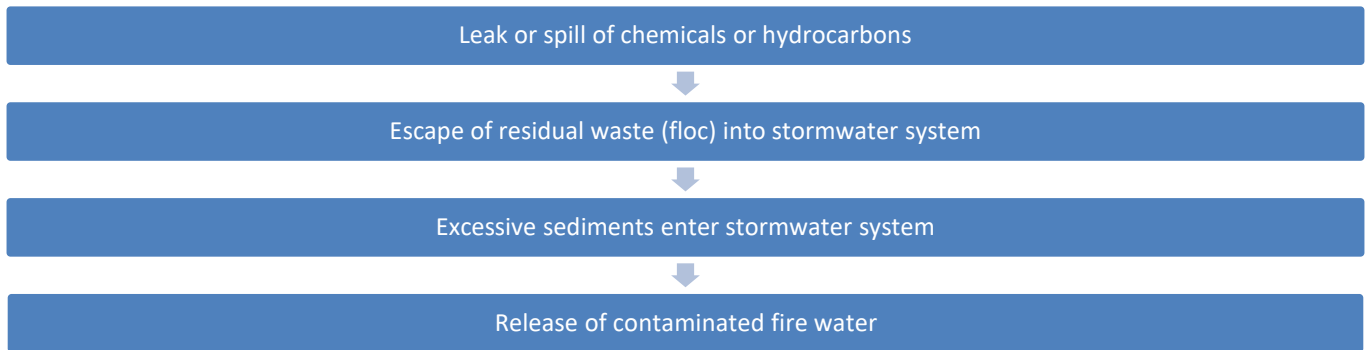
5. EXTERNAL REFERENCE DOCUMENTS

NSW *Protection of the Environment Operations Act 1997*



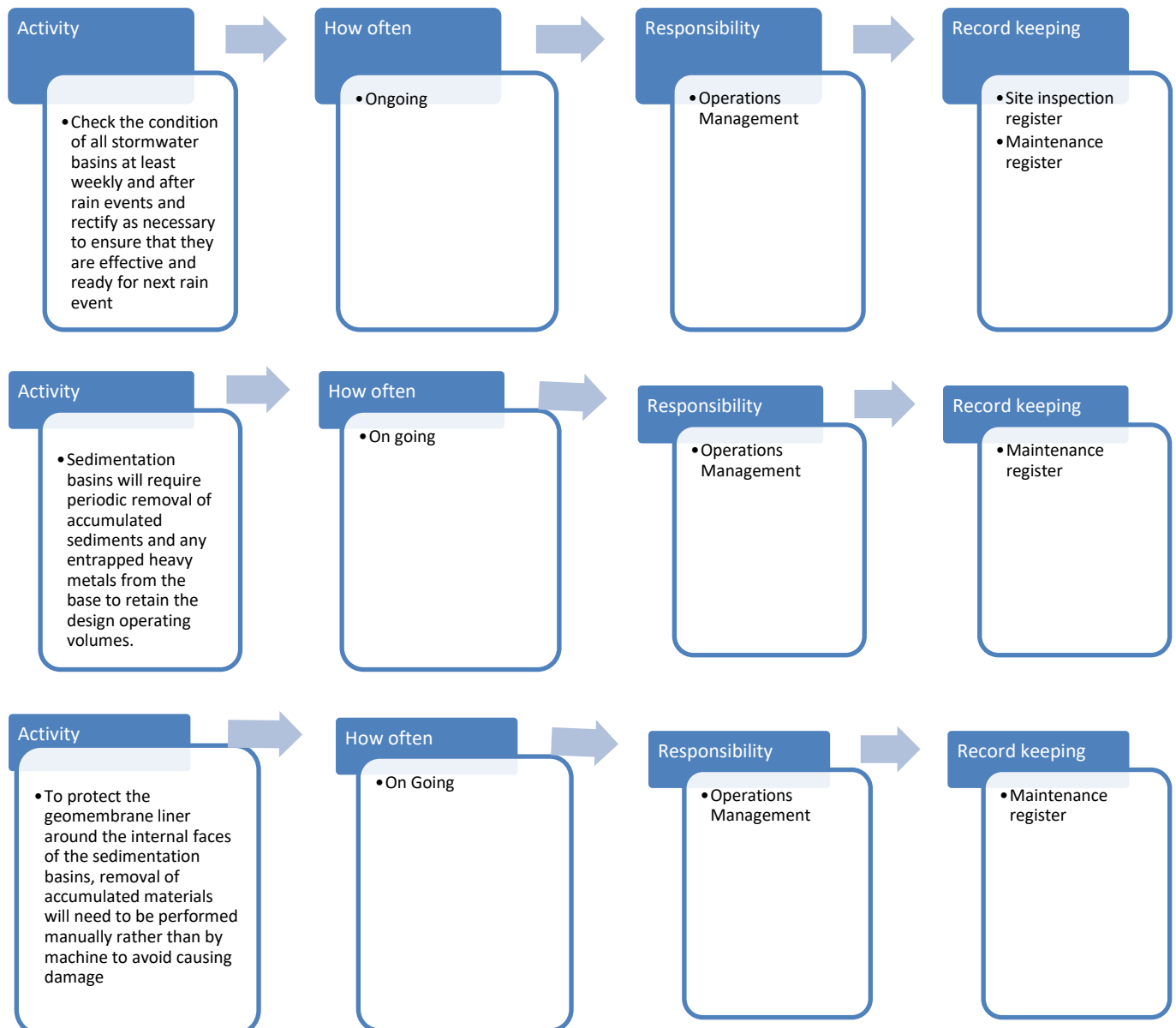
NSW DECC *Managing urban stormwater: soils and construction* (2008)

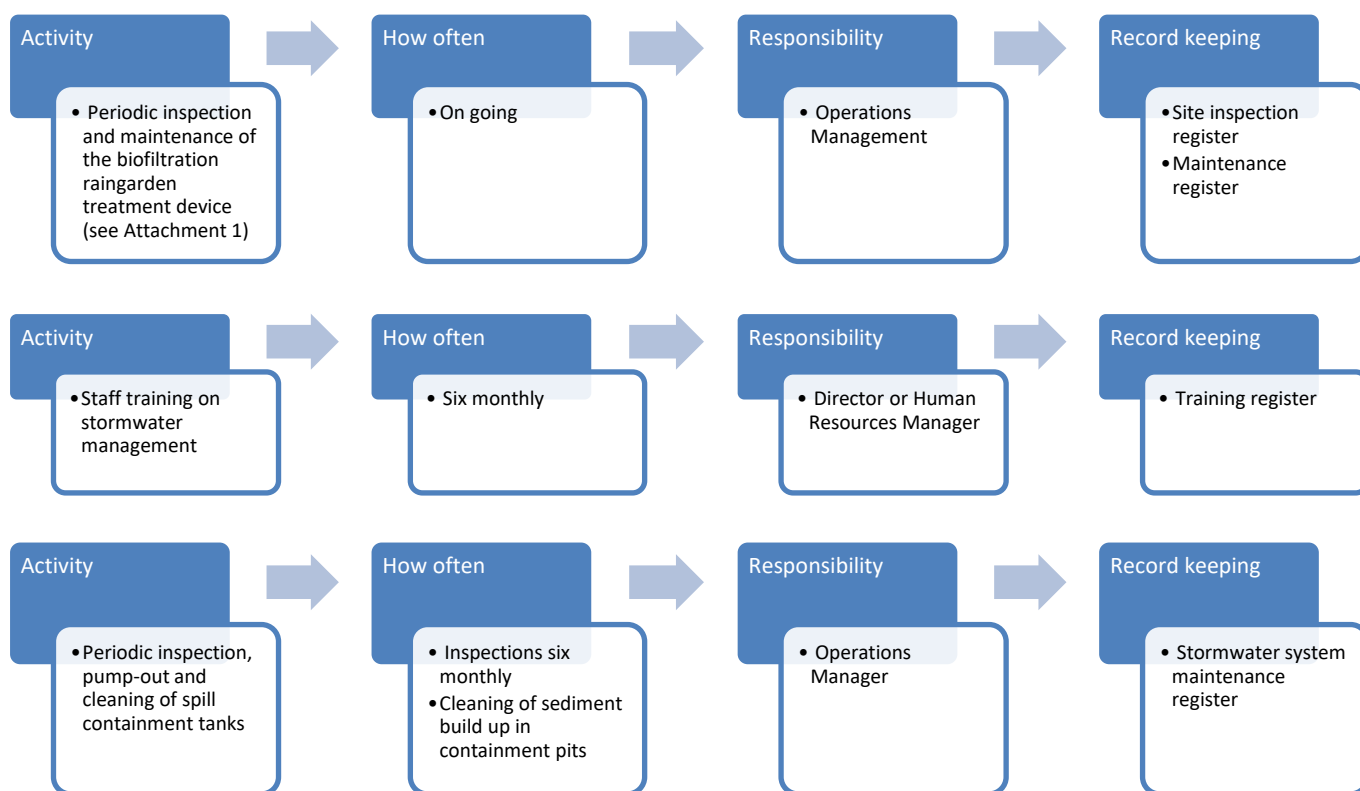
6. MAIN RISKS FOR STORMWATER POLLUTION



7. PREVENTATIVE MEASURES TO BE UNDERTAKEN

7.1. General





8. STEPS TO TAKE IF POLLUTANTS ENTER THE STORMWATER

Activate the Pollution Incident Response Management Plan

ATTACHMENT 1 – ROUTINE MAINTENANCE REQUIREMENTS FOR BIOFILTRATION AND REINGARDENS

The biofiltration systems and raingardens are integral components of the site's water cycle management strategy, designed to treat stormwater runoff, enhance water quality, and reduce sediment and pollutant loads before discharge. Routine maintenance is essential to ensure these systems continue to perform effectively. Regular inspections are required every couple month, or after significant rainfall events, to check for blockages, erosion, sediment build-up, weed growth, plant health, litter accumulation, and potential oil contamination. Maintenance activities include removing debris and sediment, repairing erosion damage, replanting vegetation where dieback occurs, and controlling weeds to maintain system performance and aesthetic value. A detailed maintenance checklist accompanies the monitoring schedule to guide operators in identifying when routine, scheduled, or immediate maintenance actions are required, ensuring the long-term functionality and environmental compliance of the biofiltration systems and raingardens.

Water Cycle Management Study – Metal Recycling Facility Development - Ref:0060222
 Lot 3 DP251779
 88 Murrays Flat Road, Towrang, NSW, 2580



1 October 2025



A: 31 Hoddle Avenue
 Goulburn, NSW, 2580
 M: 0428 863 401
 E: sowdes@bigpond.com
 ABN: 63 320 094 249



Routine maintenance requirement for Biofiltration Systems and Raingardens.

To be performed every three months or as site conditions dictate after significant weather events.

Item to be monitored	Purpose of monitoring	Performance target	Schedule maintenance or investigation	Immediate action required	Maintenance action required
The inlet and outlet structures of a bioretention system or raingarden should be free of debris, litter and sediment to ensure flow is not impeded. Large storms, flood events and vehicles can also damage or block these structures and prevent the system working as designed. The main structural and monitoring elements of a bioretention system or raingarden are:					
Structures	- Inlet structures, pits, grates and channels - Overflow pipes, junction pits, underdrains and outlet pipes	Clear and undamaged	Partially blocked, observed damage	Mostly blocked, severe damage	Organise removal of debris, inspect for associated erosion and scour damage within the raingarden and organise repair work as required
Erosion	Erosion will affect the distribution of flow across the raingarden. If left untreated small sites of erosion can quickly spread over large areas becoming costly to repair	Erosion absent	Erosion damage visible but structure functional	Severe erosion. Damage impairing function of the raingarden	Schedule investigation into cause of the erosion. Once the source of the damage is rectified scour holes should be replaced with appropriate filter material. Replace any damaged plants to meet the design plant schedule
Sediment build up	The accumulation of sediment is part of the prescribed function of a raingarden. However, sediment must be regularly removed when accumulated to ensure that the sediment trapping performance of this system is sustained.	Sediment absent	Sediment accumulation appears excessive	Sediment accumulation to more than 10% of surface area	Undertake investigation to identify sediment source. Remove accumulated debris. Replace any damaged plants to meet the design plant schedule
Weeds	Weeds should be removed from the sedimentation basin: - Weeds compete with the desirable plants for the available soil moisture - Weeds compromise the visual amenity of the raingardens	No weeds present	Weeds present	Noxious or environmental weeds present, or weeds cover more than 25%	Hand removal or targeted herbicide treatment with registered chemicals. General spraying should not be undertaken as overspray will kill the desirable plant species.

Water Cycle Management Study – Metal Recycling Facility Development - Ref:0060222
 Lot 3 DP251779
 88 Murrays Flat Road, Towrang, NSW, 2580



1 October 2025

Item to be monitored	Purpose of monitoring	Performance target	Schedule maintenance or investigation	Immediate action required	Maintenance action required
Plant condition	Plants are crucial to the performance, function and visual amenity of the raingardens. The raingardens become as much a feature of the development as the buildings themselves.	Healthy vegetation	Poorly growing or visually stressed	Die back / dead plants	Investigate possible causes of observed changes in plant health; eg, due to inappropriate soil moisture content, disease, competition by weeds, poison containment. Once the problem has been rectified infill re-planting may be required if more than 10% of plants are affected which must be as per the original design planting schedule.
Litter - organic	Organic litter can provide an additional source of nutrients and introduce weed species which can compete for soil moisture and reduce raingarden efficacy. Accumulated organic matter and litter can affect the visual amenity of the raingardens	No litter visible	Litter visible	Litter blocking structures or detracting from visual amenity	Identify the sources of organic litter and address with appropriate response action. All litter must be removed from the raingarden.
Litter - anthropogenic	Litter can potentially block the inlet and outlet structures resulting in flooding, as well as detract from the visual amenity	No litter visible	Litter visible	Litter blocking structures or detracting from visual amenity	Identify and address the sources of rubbish generating within the development eg, overflow from rubbish bins, dumping or wind blown from nearby sources.
Oil slicks	Oil spills / inflows are better trapped and isolated within a raingarden than allowed to flow to enter the stormwater system	No visible oil	Persistent but limited visible oil	Extensive or localised thick layer of oil visible	It is better that the oil is contained within the system rather than allowed to flow to the downstream waterway. Once contained and 'mopped up' remove affected section of raingarden and replace with same as original filter media and plant species.

Water Cycle Management Study – Metal Recycling Facility Development - Ref:0060222
 Lot 3 DP251779
 88 Murrays Flat Road, Towrang, NSW, 2580



1 October 2025



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 ABN: 63 326 094 249



SOWDES

Maintenance checklist – Biofiltration Systems / Raingardens.

Recommended to be undertaken every 3 months, as necessary after significant rain events or as site conditions dictate.

Item		Performance Target	Schedule Maintenance or Investigation	Immediate Action Required	Comment	Action Processed
		Tick relevant category or write 'NA' in Comments column				
1	Inlet structures, grates & pits	Clear and undamaged	Partially blocked or observed damage	Mostly blocked, severe damage		
		☐	☐	☐		
2	Overflow pits & grates	Clear and undamaged	Partially blocked or observed damage	Mostly blocked, severe damage		
		☐	☐	☐		
3	Underdrains	Clear and undamaged	Partially blocked or observed damage	Mostly blocked, severe damage		
		☐	☐	☐		
4	Erosion	Erosion absent	Erosion damage visible but function not impaired	Severe erosion damage impairing function of device		
		☐	☐	☐		
5	Sediment accumulation (raingardens)	Sediment absent	Fine sediment accumulation apparent on the raingarden media surface	Coarse sediment or large volumes of sediment accumulation apparent on the raingarden media surface		
		☐	☐	☐		

Attachment 6: Procedure for Emergency Preparedness and Response

EMERGENCY PREPAREDNESS AND RESPONSE

Sydney Metal Traders
Scrap Metal Recycling Facility
88 Murrays Flat Road, Towrang

1. PURPOSE OF THIS PROCEDURE

To reduce or eliminate the risk of an emergency and be prepared to respond to an emergency situation

2. RESPONSIBLE PERSON

Operations Manager

3. ASSOCIATED INTERNAL DOCUMENTS

Operational Environmental Management Plan



Pollution Incident Response Management Plan



Procedure for Fire Prevention

4. EXTERNAL REFERENCE DOCUMENTS

NSW Protection of the Environment Operations Act 1997



Work Health and Safety Act 2011 (NSW)

5. MAIN RISKS AT THE SITE

Personal injury



Ignition of flammable materials



Leak or spill of hydrocarbons



Natural disaster (flood, storm,)

6. MITIGATION MEASURES

Personal Injury

- Refer to Site Safety Procedures

Spill or leak of chemicals

- All chemicals will be appropriately stored, labelled and banded
- Spill kits will be ready accessible and maintained
- Safety Data Sheets for all chemicals will be available on site

Spill or leak of hydrocarbons

- In case of spill or leak, manually activate knife valves to avoid release of spills offsite and/or into infiltration pit (re-open valves once threat has ceased).
- Storage of diesel fuel will occur onsite in a banded and covered containment area complying with NSW EPA standards
- An appropriate spill kit will be maintained on site to absorb any spills
- Any diesel spillages during refueling will be immediately contained and absorbed, and disposed of appropriately

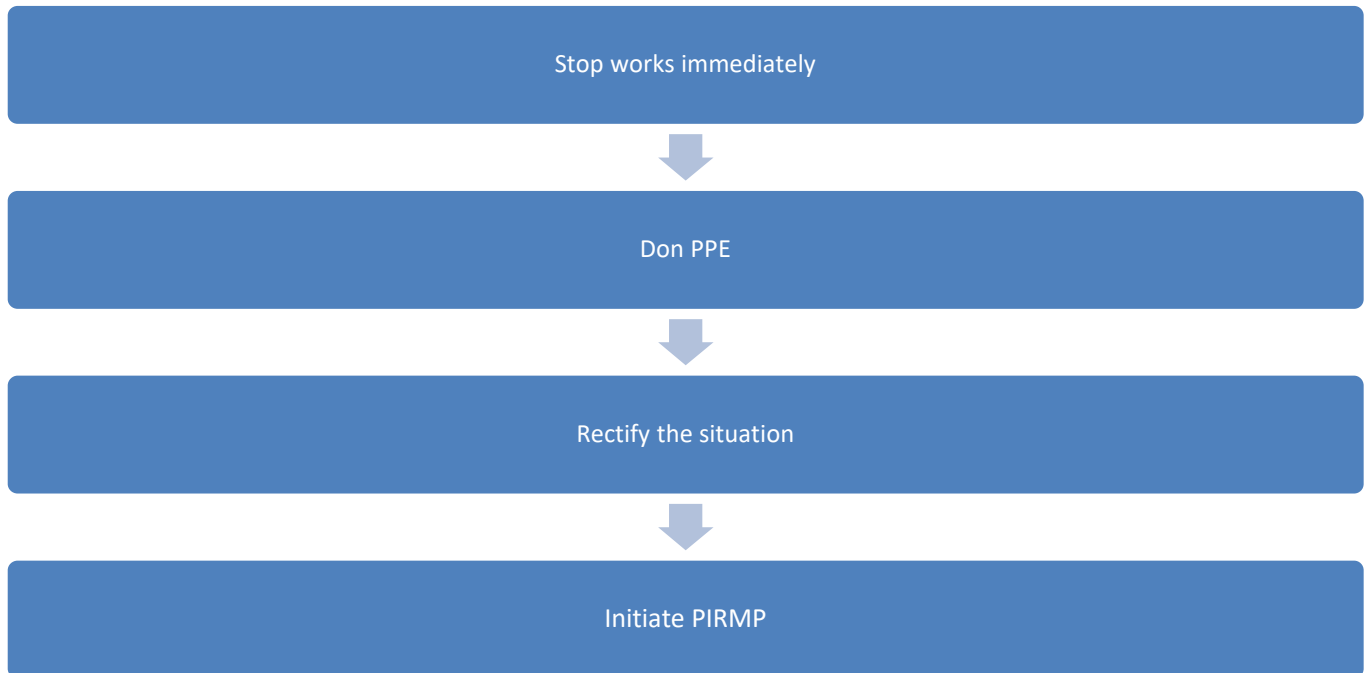
Explosion or fire

- In case of explosion or fire, manually activate knife valves to avoid release of spills offsite and/or into infiltration pit (re-open valves once threat has ceased).
- Fire hose reels, general purpose fire extinguishers, and fire extinguishers suitable for control of oil/fuel fires, will be available on site
- Fire detection systems and procedures will be implemented and maintained
- Staff will be trained in the use of fire extinguishers and hose reels
- Hot work control system will be implemented
- Gas cylinders will be stored and labelled correctly

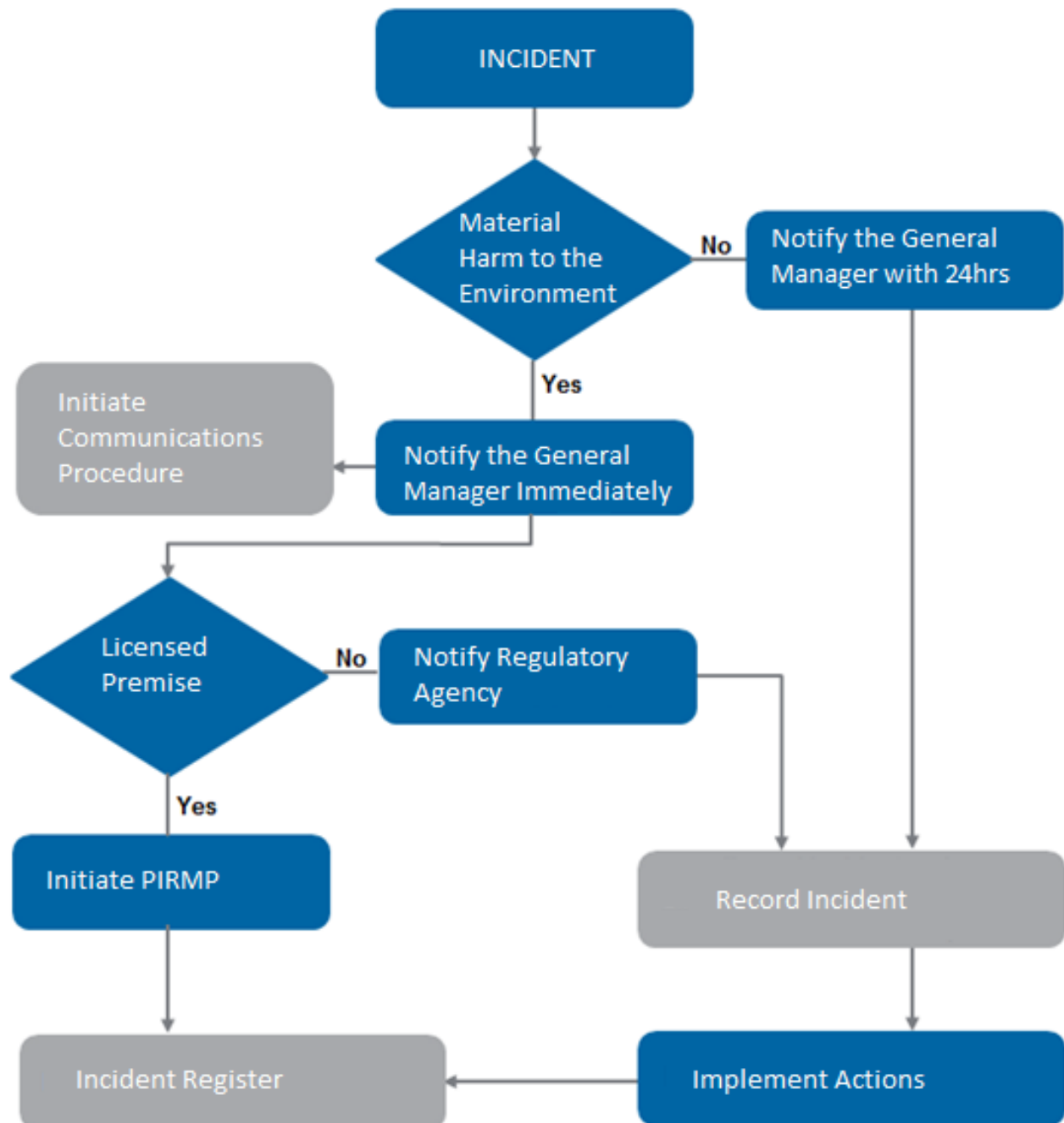
Natural disaster

- Appropriate insurance policies will be purchased
- Staff will be trained in the emergency procedures

7. STEPS TO BE TAKEN IN THE EVENT OF A POTENTIAL EMERGENCY



8. STEPS TO BE UNDERTAKEN IN AN EMERGENCY SITUATION



9. SAFETY AND CLEAN-UP EQUIPMENT

Equipment	Location
Spill kits	In and around the buildings of the site including the administration office, workshop, depollution bay and gatehouse.
Safety Data Sheets (SDS)	Office
First Aid Kits	Office, Workshop, Depollution Bay and Gatehouse.
Fire hydrants	Along the site perimeter, near entry/exit, driveway, and parking areas
Fire extinguishers	Dry powder extinguishers shall be readily accessible from waste storages to provide quick response by site personnel in the event of a fire. Portable fire extinguishers to mobile plant involved with managing the stockpile
Fire hose reels	Inside the Hammer Mill Control Room, Gatehouse, Workshop, Storage Shed, and Shredder Shed
Personal Protective Equipment	Worn by staff, spares in office
Traffic bollards and traffic cones	Office

Attachment 7: Procedure for Fire Prevention

FIRE PREVENTION PROCEDURE

Sydney Metal Traders
Scrap Metal Recycling Facility
88 Murrays Flat Road, Towrang

1. PURPOSE OF THIS PROCEDURE

To ensure that fire safety requirements are met and to identify fire hazards to human health and the environment

To ensure that all fire risks are minimised on the Site.

2. RESPONSIBLE PERSON

Operations Manager

3. ASSOCIATED INTERNAL DOCUMENTS

Pollution Incident Response Management Plan



Procedure for Emergency Preparedness

4. EXTERNAL REFERENCE DOCUMENTS

NSW *Protection of the Environment Operations Act 1997*



Fire & Rescue NSW *Fire safety guideline: Fire safety in waste facilities*

5. MAIN FIRE RISKS AT THE SITE

Leak or spill of hydrocarbons

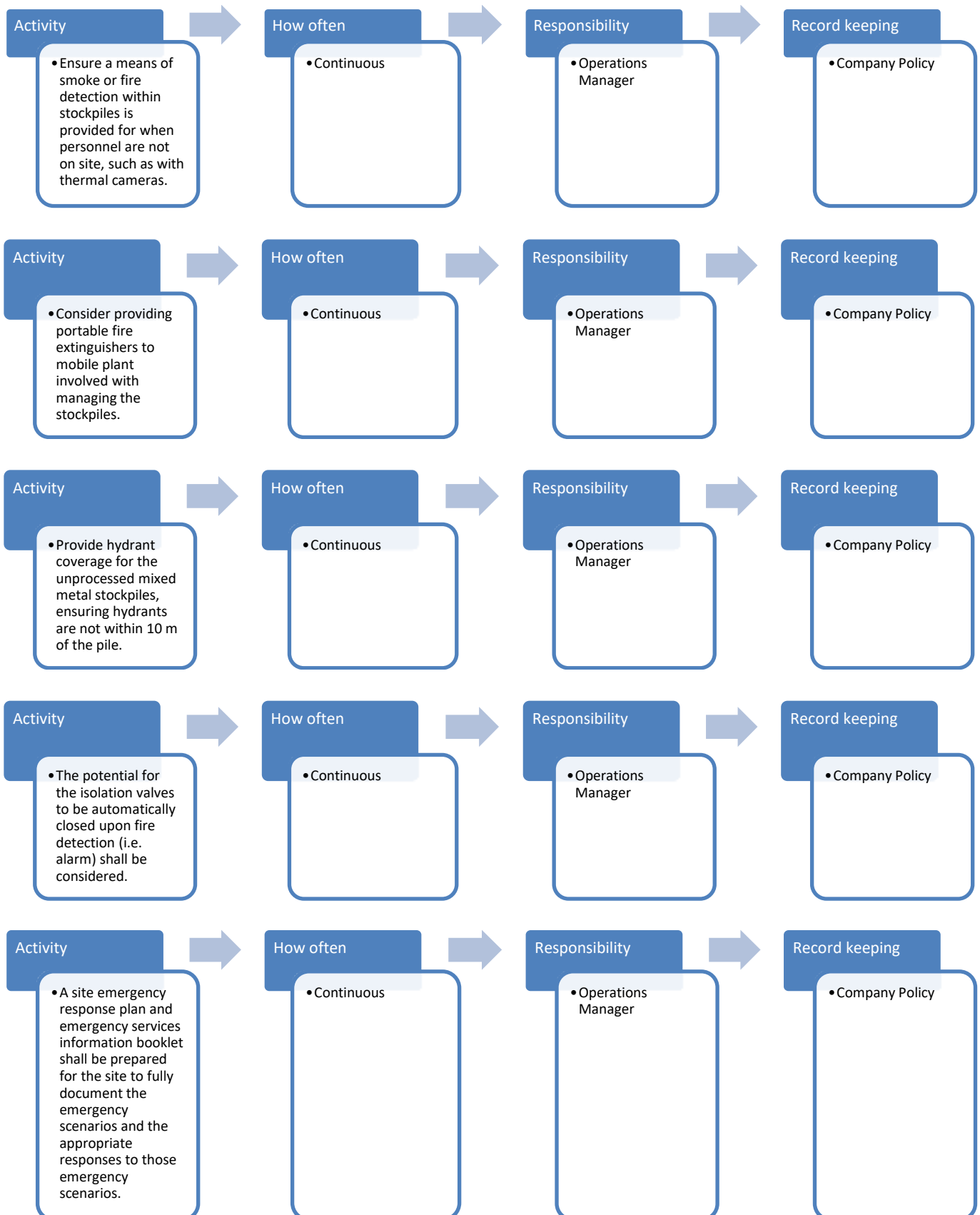


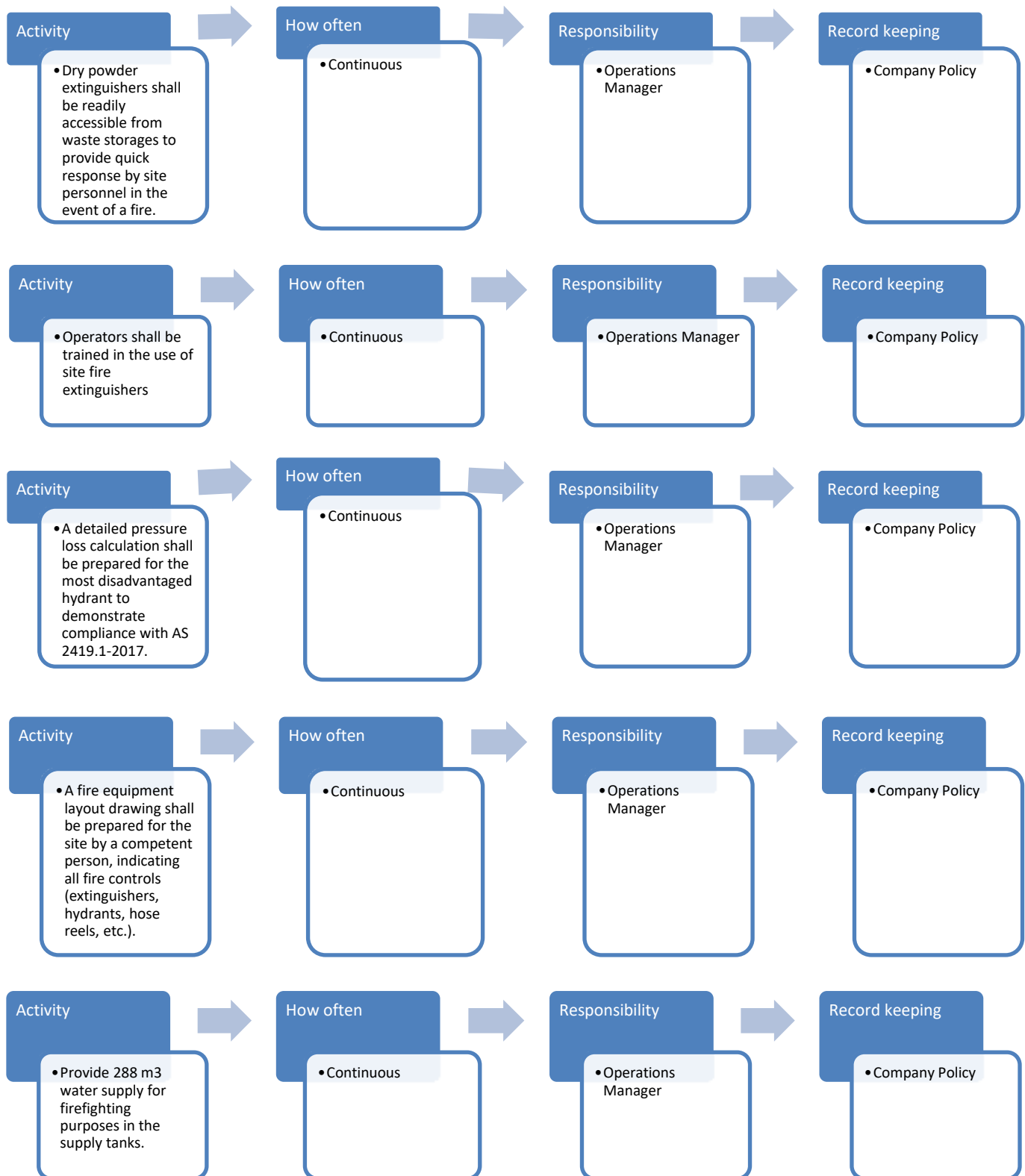
Ignition of flammable stockpiled materials

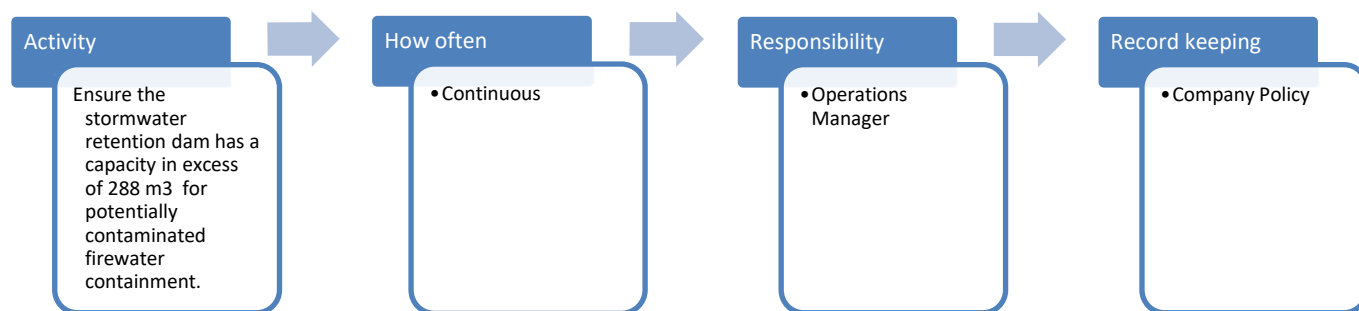


Spread of a fire at the Site to/from neighbouring sites

6. PREVENTATIVE MEASURES TO BE UNDERTAKEN







7. LOCATION OF FIRE FIGHTING EQUIPMENT

Equipment	Location
Spill kits	In the building of the site
Safety Data Sheets (SDS)	Office
First Aid Kit	Office
Fire hydrants	Along the site perimeter, near entry/exit, driveway, and parking areas
Fire extinguishers	Dry powder extinguishers shall be readily accessible from waste storages to provide quick response by site personnel in the event of a fire. Portable fire extinguishers to mobile plant involved with managing the stockpile
Fire hose reels	Inside the Hammer Mill Control Room, Gatehouse, Workshop, Storage Shed, and Shredder Shed
Personal Protective Equipment	Worn by staff, spares in office
Traffic bollards and traffic cones	Office

8. STEPS TO TAKE IF A FIRE OCCURS

Activate the Pollution Incident Response Management Plan

Attachment 8: Procedure for Weighbridge Management

WEIGHBRIDGE MANAGEMENT PROCEDURE

Sydney Metal Traders
Scrap Metal Recycling Facility
88 Murrays Flat Road, Towrang

1. PURPOSE OF THIS PROCEDURE

To effectively and responsibly operate and maintain a certified weighbridge to the *National Measurement Act 1960* and accurately measure the total amount of scrap metal received, processed, and exported from the Site.



This weighbridge data is **not required** to be reported to the EPA through the online Waste and Resource Reporting Portal (WARRP) within 30 days of the end of the reporting month. If in the future, more than 30,000 tonnes of scrap metal will be received and processed, and/or more than 150 tonnes of scrap metal processed per day, then an Environment Protection Licence (EPL) and reporting to the EPA would be required.

2. RESPONSIBLE PERSON

Operations Manager

3. ASSOCIATED INTERNAL DOCUMENTS

Pollution Incident Response Management Plan

4. EXTERNAL REFERENCE DOCUMENTS

Protection of the Environment Operations (Waste) Regulation 2014



National Measurement Act 1960



Waste Levy Guidelines NSW EPA (2018)

5. KEY REQUIREMENTS

Ensure that each vehicle that enters or leaves the waste facility for a purpose relating to the operation of the facility (whether or not the vehicle is being, is intended to be or has been used to transport or deliver waste) is weighed by the weighbridge on entering and on leaving the facility



Take all reasonable steps to ensure that the weighbridge is maintained in proper working order



Ensure that the weighbridge is verified (within the meaning of the *National Measurement Act 1960* of the Commonwealth) at least once a year

6. WEIGHING PROTOCOL – VEHICLE ENTRY AND EXIT

All vehicles enter the Site via the main entrance and proceed to the weighbridge



Entrance points clearly signposted and visible from both the street and the Site



The Weighbridge Operator or Operations Manager will monitor vehicle movements, instructing vehicles to wait for outgoing vehicles if necessary



Site speed limits will be strictly enforced



Vehicles will be weighed over the weighbridge based on the requirements given in Section 8 of this procedure



Vehicles then unload in the designated tipping area



Vehicles will then exit via the weighbridge and have their nett weight recorded



Record keeping requirements are given in Section 9



Where the tared weight of vehicles are kept by the Licensee, recording of nett weight upon exit of the facility is not required

7. WEIGHING PROTOCOL – EXEMPT VEHICLES

All vehicles upon entry to the site will need to pass over the weighbridge except for small visitor vehicles not carrying waste or other materials



In this case, record the vehicle registration number, date and time the vehicle enters or exits the facility. This may be recorded in the facility's site register or visitors book.



No records need to be kept for small staff vehicles not carrying waste or other materials.

8. WEIGHING PROTOCOL - WEIGHBRIDGE DATA RECORDING

Upon entry to the facility, vehicles need to be weighed on the weighbridge and details recorded, including gross weight



When vehicles exit the facility, they need to pass over the weighbridge for nett weight recording unless the stored tare of the vehicle is kept up to date



All details given in Table 8.1 need to be recorded upon vehicle entry and exit of the facility



Data is to be recorded by the Weighbridge Operator into the Licensee's Excel database

Table 8.1. Data recording requirements

Delivery to the facility	Transport from the facility
Date and time vehicle enters facility	Date and time vehicle exits facility
Purpose of entry	Purpose of visit
Vehicle registration number	Vehicle registration number
Weight of vehicle	Weight of vehicle
Amount of waste/other material (2 decimal places)	Amount of waste/other material (2 decimal places)
Waste type	Waste type
Waste stream	Waste stream

9. RECORD KEEPING REQUIREMENTS

Hard copies - all original records (such as paper documents) must be kept for 6 years



Identify any adjustments or amendments to these records



Electronic records for each vehicle visit must:

1. Be backed up weekly
2. Stored in a secure location
3. Kept for 6 years
4. Fields include date, weight, vehicle registration displayed as a heading in the first row & the content set out below that heading.
5. Manual records may be used for the Facility.

10. WEIGHBRIDGE CERTIFICATION

Every 12 months, the Licensee is required to ensure the weighbridge is calibrated and certified to meet the requirements of the *National Measurement Act 1960*



Calibration records should be kept on file.

Attachment 9: Pollution Incident Response Management Plan

PIRMP – Sydney Metal Traders

88 Murrays Flat Road, Towrang

September 2025

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: <none required if processing under 30,000 tonnes per year scrap metal>

Approved by: Ahmed Abdulkhalek

Signature: <insert signature>

Position/Title: General Manager

Date: <insert date>

PURPOSE:

The Facility will receive up to 30,000 tonnes per annum of scrap metals, with daily throughputs below 150 tonnes, comprising predominantly ferrous and a smaller fraction of non-ferrous grades (aluminium, copper, stainless steel, lead, zinc, tin, sheet metals, batteries and motors). Of the material received, process yields indicate around 18,000 t/yr will be recovered as ferrous product (approximately 60%), 4,000 t/yr as non-ferrous product (13.33%), and 8,000 t/yr (about 20–30% by weight).

All incoming loads are measured on the inbound weighbridge, and on-site storage is managed within a maximum concurrent holding capacity of 14,354 tonnes across designated pads and recovery bays to maintain safe and compliant operations. The estimated output materials from the shredding and separation processing of scrap metals

The Site processes less than 150 tonnes per day of scrap metal and less than 30,000 tonnes per year. The Site is therefore under the threshold and therefore no EPA licence is required (as long as thresholds are not exceeded). Were the Site to process over 30,000 tonnes per year, or over 150 tonnes per day, the Site would be required to hold an Environment Protection Licence (EPL) with the NSW Environment Protection Authority (EPA) for 'Scrap metal processing'. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 74 of the *Protection of the Environment Operations (General) Regulation 2022*.

Pollution Incident Response Plan - Details	
Name: (including ABN)	Sydney Metal Traders ABN: 66 303 566 424
EPL number:	None required
Premises name and address:	88 Murrays Flat Road, Towrang
Company or business contact details	Name of person responsible: Ahmed Abdulkhalek Position or title: General Manager Business hours contact number/s: 0433 190 056 After hours contact number/s: 0433 190 056 Email: ahmed@sydneymetaltraders.com.au
Website address:	https://sydneymetaltraders.com.au
Activities carried out on the Site	Metallurgical activities (Scrap metal processing under 30,000 per year)
Fee-based activity/activities on EPL:	Nil
Contact details must include the names, position titles and 24-hour contact details. Details are to include alternative person/s, should the primary contact be unavailable.	
PIRMP activation	Name of person responsible: Ahmed Abdulkhalek Position or title: General Manager Business hours contact number/s: 0433 190 056 After hours contact number/s: 0433 190 056 Email: ahmed@sydneymetaltraders.com.au
Alternative Contact	Name of person responsible: Yousef Abdulkhalek Position or title: Manager Business hours contact number/s: 0433 190 056 After hours contact number/s: 0433 190 056 Email: yousef@sydneymetaltraders.com.au
Notifying relevant authorities Notification should be made by a person with an appropriate level of authority within the company.	Name of person responsible: Ahmed Abdulkhalek Position or title: General Manager Business hours contact number/s: 0433 190 056 After hours contact number/s: 0433 190 056 Email: ahmed@sydneymetaltraders.com.au

Managing response to pollution incident	Name of person responsible: Yousef Abdulkhalek	
	Position or title: General Manager	
	Business hours contact number/s: 0433 190 056	
	After hours contact number/s: 0433 190 056	
	Email: yousef@sydneymetaltraders.com.au	
Identify any persons or authorities required to be notified as per Part 5.7A of the POEO Act in the case of a pollution incident that causes or threatens to cause material harm to the environment.		
Relevant authorities include:		
1. Fire & Rescue NSW and/or Rural Fire Service as applicable – 000 (first notification)		
2. EPA – 131 555		
3. NSW Health (nearest public health unit) – see https://www.health.nsw.gov.au/Infectious/Pages/phus.aspx#Port		
4. SafeWork NSW – 131 050		
5. Local authority (usually the local council) in which the pollution has occurred.		
Note: The local council and public health unit will vary depending on the location of the pollution incident. For mobile plant licences the PIRMP will need to include the person or people who are responsible for identifying the local authority and nearest public health unit.		
Fire & Rescue NSW / Rural Fire Service	Contact number/s:	Emergency 000 or 112
Fire and Rescue NSW Goulburn Fire Station		(02) 4824 7205
EPA – Pollution Hotline	Contact number/s:	131 555
NSW EPA Parramatta		(02) 9995 5000
NSW Health – Public Health Unit	Relevant Area Health Service:	Goulburn Base Hospital
	Contact number/s:	(02) 4825 4000
SafeWork NSW	Contact number/s:	13 10 50
Local authority	Contact number/s:	(02) 4823 4444
Goulburn Mulwaree Council		
Any other identified organisation or agency requiring notification (if applicable)		
Department of Planning Industry and Environment – Parramatta Office	Contact number/s:	1300 305 695

Notification of neighbours and the local community

Identify owners or occupiers of premises in the vicinity of the licensed premises, including any sensitive premises (e.g. schools, preschools, hospitals, nursing homes):

	Type of premises	Property Address
1	The Broadway Estate	27 Murrays Flat Rd, Towrang 2580
2	N/A	93 Murrays Flat Road Towrang 2580
3	N/A	272 Murrays Flat Road Towrang 2580
4	N/A	427 Murrays Flat Road Towrang 2580
5	N/A	270 Murrays Flat Road Towrang 2580
6	N/A	17500 Hume Highway Towrang 2580
7	N/A	17564 Hume Highway Towrang 2580
8	N/A	17438 Hume Highway Towrang 2580
9	N/A	708 Boxers Creek Road Boxers Creek 2580
10	N/A	688 Boxers Creek Road Boxers Creek 2580
11	N/A	642 Boxers Creek Road Boxers Creek 2580
12	N/A	624 Boxers Creek Road Boxers Creek 2580
13	N/A	37 Stockade Lane Boxers Creek 2580
14	N/A	46 Stockade Lane Boxers Creek 2580
15	N/A	36 Stockade Lane Boxers Creek 2580
16	N/A	604 Boxers Creek Road Boxers Creek 2580
17	N/A	570 Boxers Creek Road Boxers Creek 2580
18	N/A	643 Boxers Creek Road Boxers Creek 2580
19	Nannas Hideway	649 Boxers Creek Road Boxers Creek 2580
20	N/A	669 Boxers Creek Road Boxers Creek 2580
21	N/A	681 Boxers Creek Road Boxers Creek 2580
22	N/A	17699 Hume Highway Boxers Creek 2580
23	N/A	114 Sydney Road Goulburn 2580

Figure 1. Location of Sydney Metal Traders (red) and surrounding areas.



Description and likelihood of hazards					
Provide a description of the hazards to human health or the environment associated with the activity to which the licence relates:					
Hazard	Likelihood	Consequences	Risk rating	Circumstances likely to increase likelihood or consequences	Mitigating measures to reduce risk
Fire in Building	Possible	3	Medium	- Careless operating procedures - Poor maintenance - Poor staff training - Smoking inside - Lack of inspection / maintenance of fire equipment - Arson - Contamination in incoming loads	- Staff induction and ongoing training - Staff supervision - Regular maintenance schedule - Daily inspection of stockpile temperatures - Hot work permit system - Fire detection system in areas of high fire load - Annual fire equipment inspection (required by law) - Site security
Release of contaminated fire water	Possible	4	Low	- Careless operating procedures - Failure of containment bund	- Staff induction and ongoing training - Staff supervision - Regular maintenance/inspection of bund - Ensure stormwater isolation valve in site outlet is engaged during a fire - Engage suitable contractor for removal and disposal of fire water
Fuel spill	Possible	4	Low	- Careless operating procedures - Poor maintenance/equipment failure - Accidental spill	- Staff induction and training - Regular maintenance and repair schedule - Fuel stored in designated bunded area - Spill kit positioned near fuel storage/refuelling area.
Chemical spill	Possible	4	Low	- Careless operating procedures - Poor maintenance /equipment failure - Accidental spill	- Staff induction and training - Regular maintenance and repair schedule - Bunding and containment around chemical storage areas - Spill kit positioned near chemical storage. - Incoming load inspection protocols
Release of litter	Possible	5	Low	- Careless operating procedures - Accidental spill	- Staff induction and ongoing training - Staff supervision

Hazard	Likelihood	Consequences	Risk rating	Circumstances likely to increase likelihood or consequences	Mitigating measures to reduce risk
				• Vehicle crash	• Regular maintenance schedule • Onsite vehicle movement controls
Exposure to hazardous substances	Possible	3	Medium	• Contamination in incoming loads • Careless operating procedures • Poor staff training	• Staff induction and ongoing training • Staff supervision • Incoming load inspection protocols
Moving vehicles	Possible	4	Low	• Careless operating procedures • Poor staff training	• Staff induction and ongoing training • Maintenance of clear pedestrian walkways • High visibility PPE • Onsite vehicle movement controls
Poorly secured/stored loads	Possible	4	Low	• Careless operating procedures • Overfilling storage bays/bins • Poor staff training	• Staff induction and training • Regular inspection of stockpiles • Clear markings of maximum fill lines for all storage areas
Moving machinery	Possible	4	Low	• Careless operating procedures • Poor maintenance • Equipment failure • Poor staff training	• Staff induction and ongoing training • Staff supervision • Regular maintenance schedule • Lockout/tag procedure during equipment maintenance

Safety equipment

Describe the safety equipment or other devices used to minimise the risks to human health or the environment and to contain or control a pollution incident (the table assumes all fire safety recommendations have been implemented):

Equipment	Location
Spill kits	In and around the buildings of the site including the administration office, workshop, depollution bay and gatehouse.
Safety Data Sheets (SDS)	Office
First Aid Kit	Office, Workshop, Depollution Bay and Gatehouse.
Fire hydrants	Along the site perimeter, near entry/exit, driveway, and parking areas
Fire extinguishers	Dry powder extinguishers shall be readily accessible from waste storages to provide quick response by site personnel in the event of a fire. Portable fire extinguishers to mobile plant involved with managing the stockpile
Fire hose reels	Inside the Hammer Mill Control Room, Gatehouse, Workshop, Storage Shed, and Shredder Shed
Personal Protective Equipment	Worn by staff, spares in office
Traffic bollards and traffic cones	Office

Minimising harm to persons on the premises

Identify the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out:

- All visitors to sign in at the building
- All staff and visitors to adhere to safety paths and follow instructions
- All staff and visitors to wear appropriate Personal Protection Equipment at all times
- In an emergency, all staff and visitors to follow the instructions of the Chief Warden (see Emergency Plan)
- Audible alarms will sound if evacuation is necessary.

Actions to be taken during or immediately after a pollution incident

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates and actions to be taken during and after an incident:

Incident type	Action	Responsible person
Small, localised fire	- Attempt to extinguish fire with fire extinguisher or fire hose reel - Notify supervisor and/or Chief Warden	Nearby staff member/s
	- Assess situation - Instigate Emergency Plan if necessary	Supervisor or Chief Warden
	- Utilise chemical spill kit to clean up - Dispose of used absorbent litter in hazardous waste bin	Staff members, as instructed by supervisor or Chief Warden
Large fire	Instigate Emergency Plan - Alert Chief Warden - Call Fire Brigade - Evacuate area	All staff in area
	Deploy fire hose reels if safe to do so	Chief Warden
	- Engage stormwater isolation valve - Arrange for fire water to be collected by appropriate liquid waste contractor	Site supervisor
Small, localised fuel/oil/chemical spill	- Utilise spill kit to contain and collect spill - Dispose of spill and absorbent litter in hazardous waste bin	Nearby staff member/s
Large spill fuel/oil/chemical spill	Instigate Emergency Plan - Alert supervisor and Chief Warden - Evacuate area	All staff in area
	- Deploy absorbent “sausages” and chemical spill kits to contain spill - Engage stormwater isolation valve - Contact spill clean-up contractor	Site supervisor

The Chief Warden and/or Site Manager will co-ordinate responses with outside agencies.

Communications Officer will co-ordinate communications and disseminate information.

Identify the nature and objectives of any staff training program in relation to this plan:

- All staff – emergency response and pollution response to be included in employment induction
- All staff – Evacuation routes and contact details for Chief Warden and Communications Officer to be displayed in each building on site
- Wardens – Annual fire and emergency response training, OHS and Chemical Safety training every 2 years.

Testing and updating of the PIRMP

This PIRMP will be tested annually:

- Evacuation drill to occur at least annually – date and results to be recorded below.
- Relevant staff training to be recorded.
- Staff assigned to key positions of Chief Warden and Communications Officer to be kept up to date on all materials, including signs around the facility
- Records of fire equipment inspections to be kept, with dates of inspection recorded.

Detail the dates on which the plan was updated:

Example: PIRMP testing details

Date tested	Tested by (to include the names of all people involved in testing)	Details of test (e.g. nature of the test, involvement of other agencies) Note: Testing must cover all components of the plan.	Finding of test, including issues identified	Next scheduled testing date (must be within 12 months from current test)
e.g. 24.02.18	Joan Smith, Environment Manager	Desktop simulation – chemical spill	Contact details, map and pollutant inventory out of date	23.02.19

PIRMP update details

Date update occurred	Reason for update (e.g. address issues identified in testing, contact details/personnel have changed)	Details of updates (nature of changes to PIRMP)	Date the updated version uploaded to website (if applicable)	Date of completion
e.g. 24.02.18	Outdated items identified in annual testing	Contact details, map and pollutant inventory updated	26.02.18	26.02.18

Attachment 10: Site Waste Minimisation and Management Plan

Waste Management Plan – Proposed Metal Recycling Facility

Sydney Metal Traders Pty Ltd



Prepared for Sydney Metal Traders Pty Ltd
JEP Environment & Planning
ABN 43 614 057 788
ACN 614 057 788

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Acknowledgements

JEP Environment & Planning would like to thank all contributors that have informed this report. All recommendations and views in this report are attributable to JEP Environment & Planning unless otherwise stated.

Statement of Confidentiality

The contents of this report and any attachments are confidential and are intended solely for the addressee. The information may also be legally privileged. If you have received this report in error, any use, reproduction or dissemination is strictly prohibited. If you are not the intended recipient, please immediately notify the sender by reply e-mail or phone and delete this report and its attachments, if any.

We declare that

The report contains all available information that is relevant to the assessment of the Site and proposed development, activity or infrastructure to which the report relates, and the information contained in the report is neither false nor misleading.

This document has been prepared in accordance with the scope of services described in the contract or agreement between Jackson Environment and Planning Pty Ltd ACN 614 057 788 (Trading as JEP Environment & Planning) and the Client. This document is supplied in good faith and reflects the knowledge, expertise and experience of the advisors involved. The document and findings are subject to assumptions and limitations referred to within the document. Any findings, conclusions or recommendations only apply to the aforementioned circumstances and no greater reliance should be assumed or drawn by the Client. JEP Environment & Planning accepts no responsibility whatsoever for any loss occasioned by any person acting or refraining from action because of reliance on the document. The document has been prepared solely for use by the Client and JEP Environment & Planning accepts no responsibility for its use by other parties.

Note that in accordance with the Land and Environment Court Practice Note (2025) *Use of Generative Artificial Intelligence (Gen AI)*, we declare that Gen AI has not been in the preparation of this report.

Version	Authors	Date	Reviewer	Approved for issue	Date
Draft	D. Estephan	03/06/2025	E. Larson	10/10/2025	10/10/2025
Final	D. Estephan	15/10/2025	E. Larson	15/10/2025	15/10/2025

Executive Summary

This Waste Management Plan (WMP) has been developed to demonstrate how waste will be avoided or minimised, reused, recycled and disposed lawfully during the construction and operation of an industrial metal recycling facility at 88 Murrays Flat Road, Towrang, NSW (the Facility). The Facility will receive, sort, cut, shred and separate ferrous and non-ferrous scrap metals, with an annual capacity of up to 30,000 tonnes. Processed metals will be transferred off-site for sale to domestic and export markets.

Demolition activities will be limited to elements within the site boundary and will consist solely of the removal of trees to allow for construction of the facility. All green waste generated will be transported to a licensed off-site recycling facility. The estimated recycling rate for this material is 100%, supporting the project's commitment to sustainable waste practices.

Construction will be undertaken in stages and will include site preparation, installation of hardstand areas, drainage works, sediment basins, biofiltration basin, and office conversion. Waste will be separated on-site into soil, metals, construction materials and recyclables, with disposal to licensed facilities. Recycling during construction is expected to exceed 99.99%.

During operations, incoming loads will be weighed, inspected and directed to designated processing areas. Scrap metal will be processed via shearing, pre-shredding, shredding and separation, maximising recovery of ferrous and non-ferrous metals. Residual floc (20–30% by weight) will be stored in a covered, bunded bay prior to off-site disposal at a licensed facility. Annual outputs are estimated at 18,000 tonnes of ferrous metals, 4,000 tonnes of non-ferrous metals, and 8,000 tonnes of residual waste.

Environmental controls include sealed surfaces, stormwater capture and treatment, spill response, regular inspections, and compliance with EPA licensing requirements. Office operations will maintain a co-mingled recycling system with an estimated 88% recovery rate.

The Facility will contribute to NSW *Waste and Sustainable Materials Strategy 2041* targets by increasing regional recycling capacity, diverting metals from landfill, and supporting a circular economy.

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1. Introduction

This Waste Management Plan (WMP) has been prepared for a proposed metal recycling facility at 88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779). The development proposal is to receive scrap metal, shred and separate the recovered metals for transport off-site for further recycling (the Proposal/Facility). Operations will be carried out on an area of approximately 6.6 hectares (the Site) out of a total lot area of 32.3 hectares.

The proposed scrap metal processing will be carried out in designated operating areas. Equipment used for the metal processing activities will comprise oxy-cutting, stationary shear, pre-shredder, shredder (hammermill), and downstream separation and sorting equipment.

Around 3% of incoming scrap metal has been processed off site or does not require further processing and is received in a form ready for on-sale. This material includes Copper, Brass, Aluminium, Stainless Steel, Electric Motors, Used Lead Acid Batteries (ULABs) and Lead. Separate waste storage bays will be provided to store sorted and shredded metals prior to being loaded onto trucks for off-site recycling. The waste generated during operations will be safely and lawfully disposed at a licensed landfill.

This WMP has been prepared to meet Goulburn Mulwaree Council requirements.

The *Waste Avoidance and Resource Recovery Act 2001* (WARR Act) and the *Protection of the Environment Operations Act 1997* (POEO Act) govern the issues of waste generation, reuse, recycling, transport and disposal and prioritise waste solutions according to how successfully they conserve natural resources. Priority is given to reducing the overall amount of waste, followed by the reuse and then recycling of any wastes that are unavoidably created, with disposal as a last resort. The aim is to extract the maximum practical benefits from the products and to manage waste in the best possible way.

1.1. Objectives

This Waste Management Plan (WMP) has been developed to meet the following objectives:

- To maximise reuse and recycling of demolition and construction waste materials;
- To minimise potential adverse impacts relating to the management of waste on the amenity of adjoining properties and within the development; and
- To minimise the amount of waste being deposited in landfill.

1.2. Scope

This WMP assesses how the waste will be dealt with in the most environmentally sustainable way and contains the following information:

- Relevant legislation and guidelines for waste management for the Facility;
- The systems, procedures and initiatives proposed to address the management of waste materials generated during the construction and operation phases of the Facility;
- Safeguards, mitigation measures and monitoring to manage waste impacts during operation;
- Implementation of waste management controls; and
- An effective monitoring, auditing and reporting framework to assess the effectiveness of the controls implemented.

The proposed development also considers environmental best practice and sustainability to reduce the impact of the development on the environment.

1.3. The Site

The subject site is located at 88 Murrays Flat Road, Towrang, within the Goulburn Mulwaree Local Government Area (LGA). The site is situated in a rural environment approximately 190 km south-west of Sydney by road. The total area of the property is 32.3 hectares, with the proposed development to be contained within an area of

approximately 6.6 hectares. The surrounding locality is predominantly rural-residential in character, with isolated dwellings located in the area and the nearest residential area close to 3km to the west of the site. The site currently contains an existing residential building, which is proposed to be repurposed for use as administrative offices. A compacted road base will provide access to this building. The office building will be located away from the operational areas of the site to ensure the safety of non-operational staff.

The proposed development comprises a metal recovery and recycling facility. The facility will be designed to receive, sort, and process scrap metal into a range of product streams suitable for both domestic and international recycling markets and end users. Scrap metal will be sourced from Sydney, the Southern Highlands, Goulburn, the ACT, and surrounding regions. Metal processing activities will be confined to designated operational areas and will involve the use of specialised equipment, including oxy-cutting tools, a stationary shear, a pre-shredder, a shredder (hammermill), and downstream separation and sorting equipment.

The site has access to high-voltage power, and a pad-mount substation will be installed to meet energy demands. The property is not connected to Council's water or sewerage networks, and as such, an on-site effluent management system will be required. An existing effluent system on-site will be assessed to determine its capacity and suitability.

Table 1.1. Summary of key site information.

Site address	88 Murrays Flat Road, Towrang NSW 2580
Lot / Plan number	Lot 3 DP251779
Site area	32.3 hectares
Local Government Area	Goulburn Mulwaree council
Land Use Zone	E5 Heavy Industrial

The following figures provide an overview of the proposed development, including an aerial view of the site, land zoning context, the proposed site plan, the workshop layout, and associated amenities. Refer to Figure 1.1, Figure 1.2, Figure 1.3, Figure 1.4, and Figure 1.5.

1.3.1. Operational Hours

The proposed Site operations hours are:

- Monday to Friday between 6am – 6pm
- Saturdays from 7am – 4:30pm

No operations are to occur on site on Sunday and public holidays. No operation of the hammermill shredder and pre-shredder will occur during the morning shoulder period 6am-7am. Operations during this time include inbound and outbound truck movements, material handlers, and maintenance of plant and equipment. While maintenance and cleaning activities can occur at any time of the day (24 hours), to maintain the efficiency of operations, they will occur predominantly during:

- Monday to Saturday between 6am – 6pm
- Sundays on a 24-hour basis

Figure 1.1. Aerial View of the Proposal site. Blue outline is the Proposed development. Yellow outline is the site boundaries.



Figure 1.2. Land use zoning. Lot boundaries are shown in yellow.

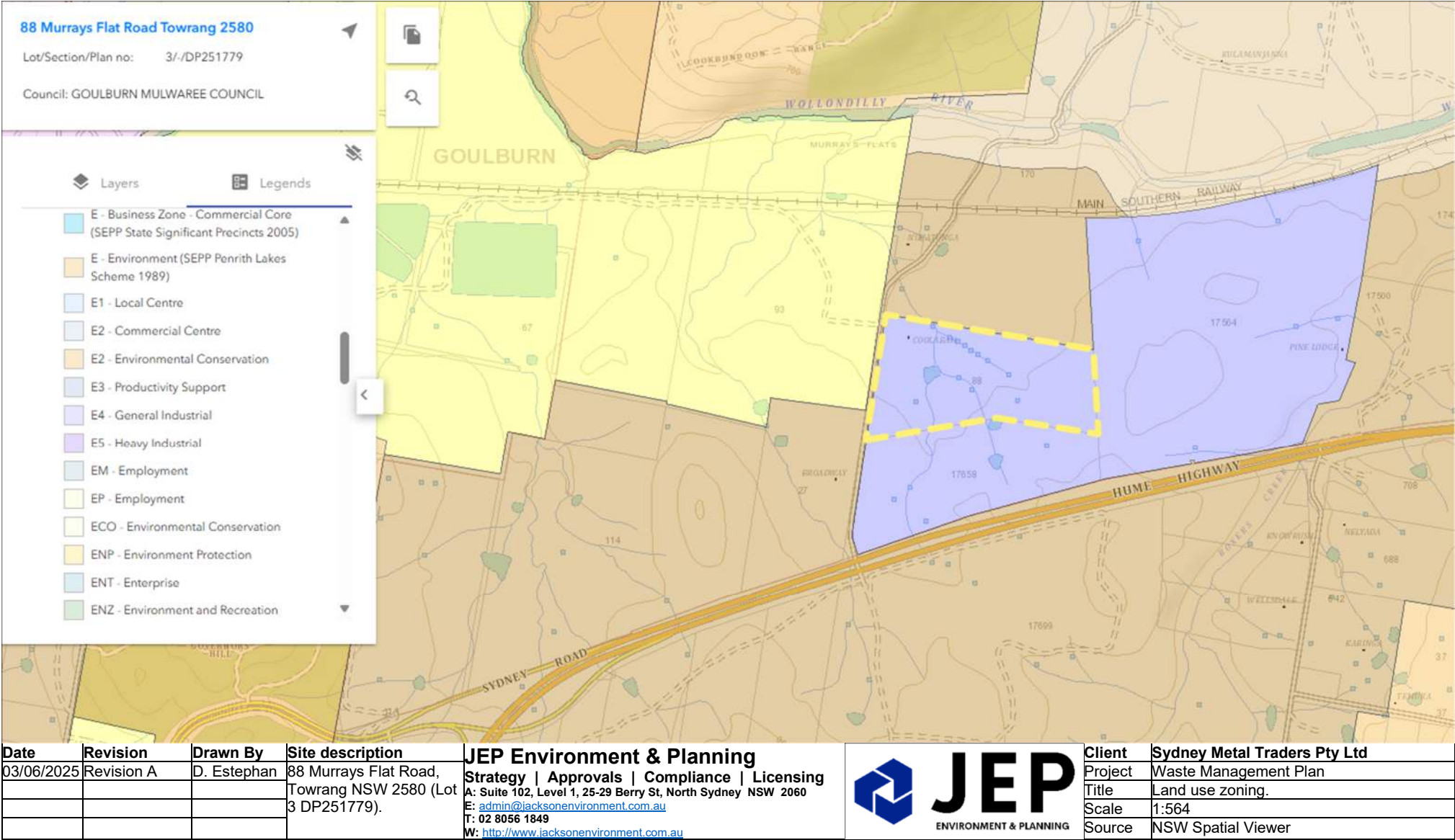
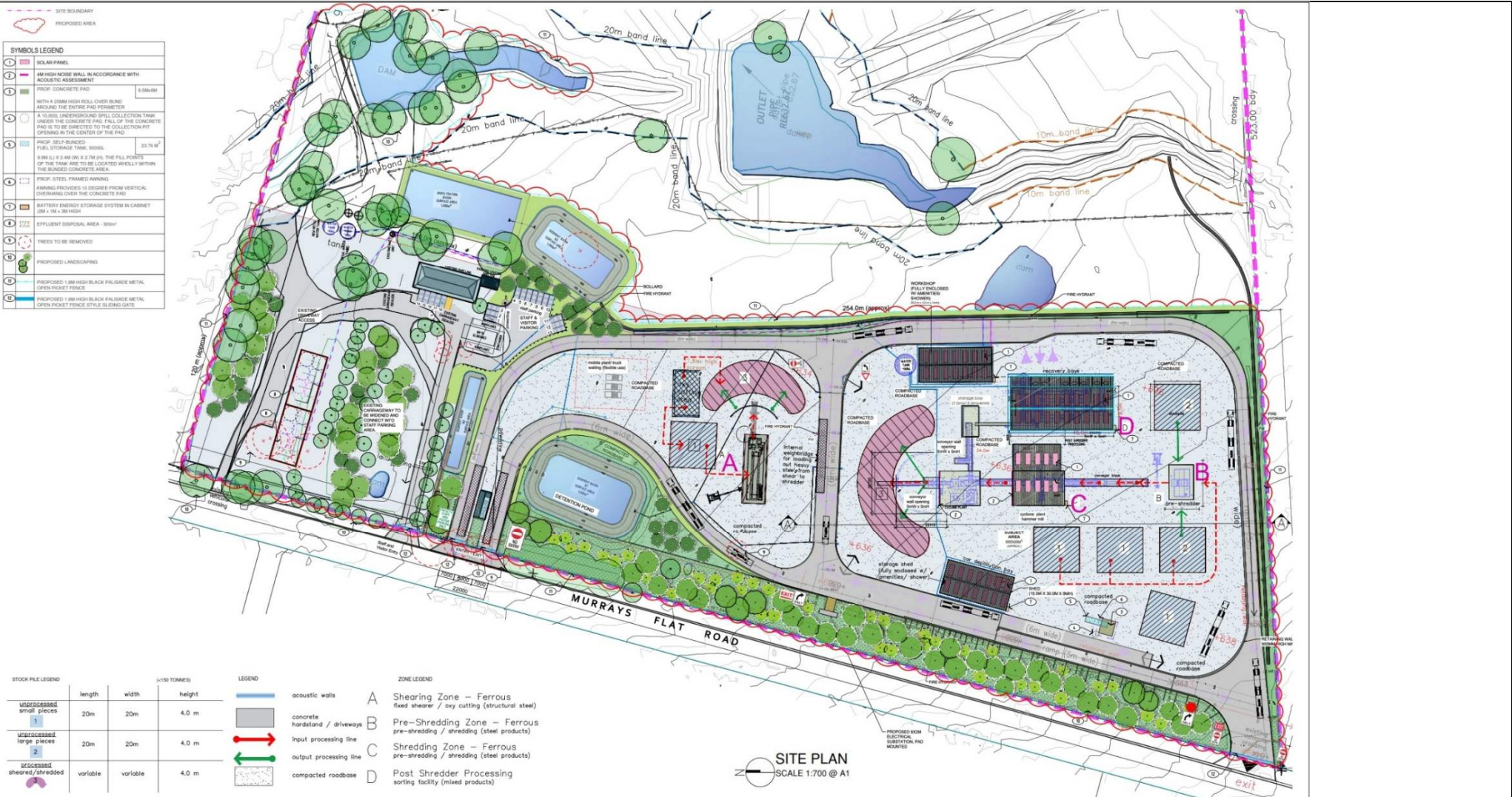


Figure 1.3. Proposed concept plan outlining the location for the Metal Recycling Facility.



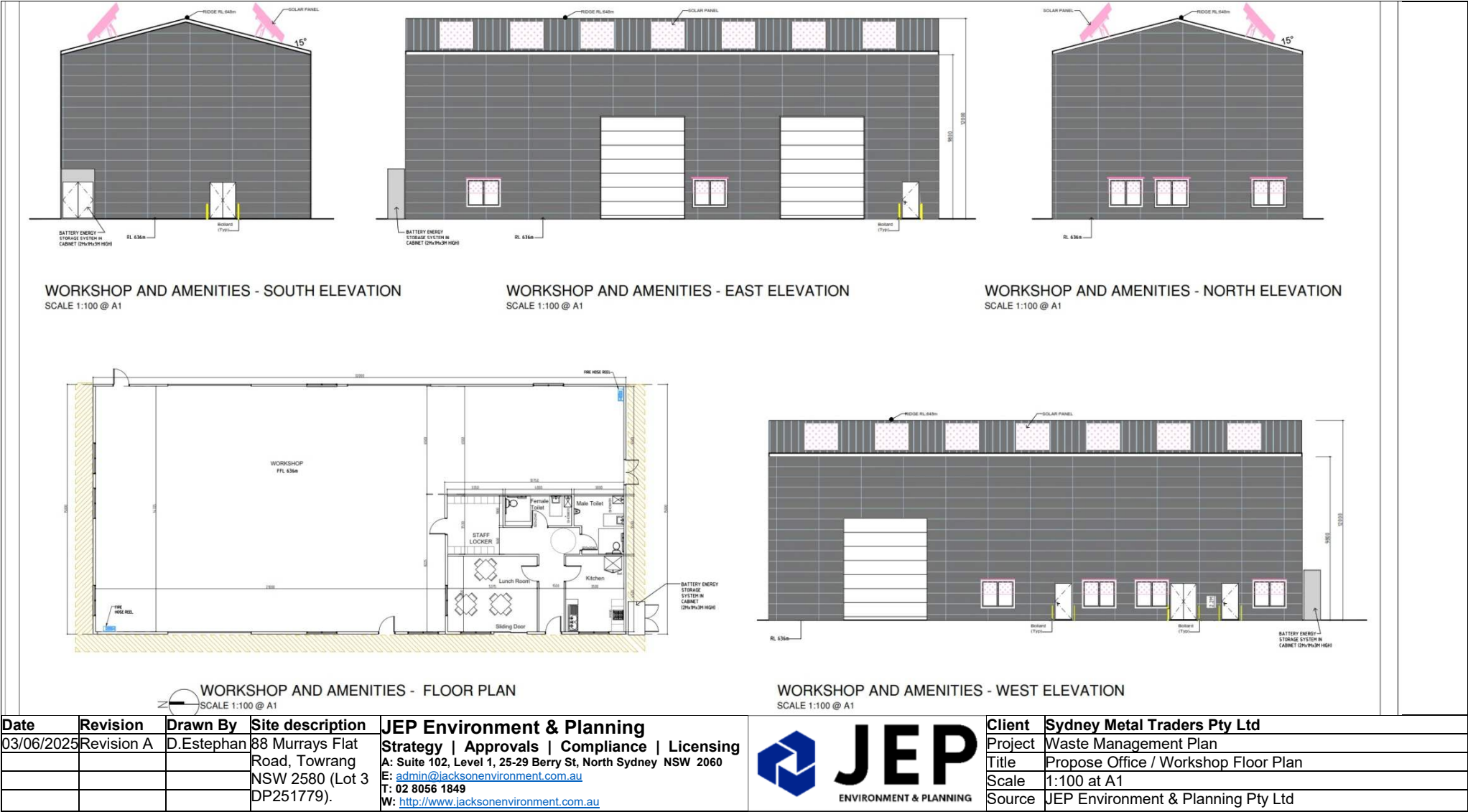
Date	Revision	Drawn By	Site description	JEP Environment & Planning Strategy Approvals Compliance Licensing	Client	Sydney Metal Traders Pty Ltd
03/06/2025	Revision A	D.Estephan	88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779).	A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	Project	Waste Management Plan
					Title	Proposed Concept plan
					Scale	1:100 at A1
					Source	SMT Business Ventures Pty Ltd

Figure 1.4. Proposed Site Plan.



Date	Revision	Drawn By	Site description	JEP Environment & Planning	Client	Sydney Metal Traders Pty Ltd
03/06/2025	Revision A	D.Estephan	88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779).	Strategy Approvals Compliance Licensing	Project	Waste Management Plan
				A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060	Title	Propose site plan
				E: admin@jacksonenvironment.com.au	Scale	1:100 at A1
				T: 02 8056 1849	Source	JEP Environment & Planning Pty Ltd
				W: http://www.jacksonenvironment.com.au		

Figure 1.5. Proposed Office/Workshop Floor Plan.



1.4. Project overview

Sydney Metal Traders Pty Ltd proposes to develop and operate a Metal Recycling Facility (the Facility) at 88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779) (the Site). The Facility is designed to process up to 30,000 tonnes per annum (tpa) of ferrous and non-ferrous scrap metals through receipt, sorting, cutting, shredding and storage operations.

The Site is located within the Goulburn Mulwaree Local Government Area and is zoned E4 General Industrial under the *Goulburn Mulwaree Local Environmental Plan 2009*. Development of a metal recycling facility is permissible with consent in this zone. The total lot area is approximately 32.3 hectares, with the operational footprint occupying 6.6 hectares along the western portion of the site.

The Site is located within the Sydney Drinking Water Catchment, and the Proposal is therefore classified as Designated Development under Clause 45(4)(c) of Schedule 3 of the *Environmental Planning and Assessment Regulation 2021*. As a result, an Environmental Impact Statement (EIS) is required, and the application will be assessed by the Southern Regional Planning Panel as Regionally Significant Development.

Key Features of the Proposal

The Facility will include the following components and infrastructure:

- Receipt and Sorting Areas – Bays for the tipping, inspection, and initial sorting of incoming scrap metals;
- Pre-Shredding and Shredding Zones – Equipped with pre-shredders, hammermill shredders, stationary shears and oxy-cutting facilities;
- Post-Processing Separation Facility – Bays for the separation, recovery, and temporary storage of processed ferrous and non-ferrous metals;
- Administrative Infrastructure – Adaptation of the existing on-site cottage into office and staff amenity space including staff parking area;
- Workshop and Maintenance Shed – A fully enclosed 32m x 15m x 12m structure for plant maintenance and operations;
- Mobile and Stationary Equipment – Including loaders, shears, conveyors, radiation detection equipment, and sorting systems;
- Weighbridges – Two entry/exit weighbridges for the accurate measurement of materials and heavy vehicle management and one internal weighbridge;
- Fuel Storage – A 50,000L self-bunded diesel tank, installed on a concrete hardstand with protective bunding and rain cover;
- Landscaping and Visual Screening – A 20-metre-wide landscaped setback along the western and southern Site boundaries;
- Traffic Management and Site Circulation – Paved hardstand access ways using existing access points with the addition of a new exit closer to the Hume Highway to minimise impacts on local roads and residential areas;
- Intersection Upgrades – To improve safe intersection sight distances (SISD), accommodate anticipated turning volumes, and provide a safe environment for both light and heavy vehicles accessing the site, the following intersection and turning upgrades are proposed:
 - CHL Lane: To be constructed at the northern intersection (for eastbound traffic);
 - CHR Lane: To be constructed at the southern intersection (for westbound traffic);
 - Restriction of right-turn movements for vehicles exceeding 9 metres in length, including;
 - Vehicles turning right from Murrays Flat Road to travel westbound on the Hume Highway;
 - Vehicles turning right from the Hume Highway (westbound) into Murrays Flat Road;

- Extending the existing channelised right-turn lane from the Hume Highway (westbound) to Murrays Flat Road to 135 metres, in compliance with Austroads standards;
- Extending and converting the existing auxiliary left-turn lane from the Hume Highway (eastbound) to Murrays Flat Road into a channelised left-turn lane with a length of 135 metres and chevron line marking for guidance;
- Constructing a 1.0-metre-wide median island on Murrays Flat Road, offset by 1.0 metre from the Hume Highway, to separate inbound and outbound traffic and provide safe clearance;
- Installing 'Give Way' signage and associated line marking at both stages of the intersection; and
- Installing signage prohibiting right turns by trucks longer than 9 metres at both stages of the intersection;
- Renewable Energy Infrastructure – The Facility will incorporate rooftop solar photovoltaic (PV) panels installed on the Workshop and Maintenance Shed, with power stored via an integrated Battery Energy Storage System (BESS);
- Wastewater system upgrades for on-site effluent treatment and disposal; and
- Stormwater Management – All operational areas will be constructed of compacted road base incorporating HDPE liners beneath operational areas, stormwater capture systems, and detention basins. The stormwater management system is designed to progressively capture and treat runoff through a series of infrastructure elements.

The Facility will receive and process scrap metal sourced from Sydney, Goulburn, the ACT, Southern Highlands, and surrounding regional areas. Processed materials will be transported to both local and overseas markets for recycling and end use.

The proposed scrap metal processing will be carried out in designated operating areas. Equipment used for the metal processing activities will comprise oxy-cutting, stationary shear, pre-shredder, shredder (hammermill), and downstream separation and sorting equipment.

Around 3% of incoming scrap metal has been processed off Site or does not require further processing and is received in a form ready for on-sale. This material includes Copper, Brass, Aluminium, Stainless Steel, Electric Motors, Batteries (ULABs) and Lead. Separate waste storage bays will be provided to store sorted and shredded metals prior to being loaded onto trucks for off-site recycling. The waste generated during operations will be safely and lawfully disposed at a licensed landfill.

Depollution activities will occur within a purpose-built enclosed shed structure identified in the architectural plans as the Depollution Bay. This area is designed to safely receive end-of-life vehicles (ELVs) for the removal of hazardous fluids and components prior to shredding or further processing. Upon arrival, whole vehicles will be inspected and transferred to the depollution bay where trained personnel will undertake the draining of oils, fuels, brake fluids, coolants, and other hazardous substances, using industry-standard vacuum and containment systems. Fluids will be securely stored in bunded, clearly labelled tanks or containers, pending lawful off-site disposal at a licensed waste facility.

2. Legislative Requirements

2.1. State and Legislative Requirements

The key sources of waste management regulation in New South Wales include:

- The *Protection of the Environment Operations Act 1997*, which provides enforcement provisions, a licensing framework and other tools to protect human health and environment from the inappropriate use of waste;
- The *Protection of the Environment Operations (Waste) Regulation 2014*, which includes thresholds for environment protection licences, and outlines the waste levy system;
- The *Protection of the Environment Operations (Clean Air) Regulation 2021*, which provides regulatory measures to control emissions from various sources including industry;

- The *Waste Avoidance and Resource Recovery Act 2001*, which sets the waste hierarchy and the NSW Waste Avoidance and Resource Recovery Strategy;

The requirements for classifying, handling and disposing of particular types of wastes is defined in the EPA Waste Classification Guidelines.

2.1.1. Protection of the Environment Operations Act 1997

The *Protection of the Environment Operation Act 1997* (POEO Act) prohibits any person from causing pollution of waters, or air and provides penalties for air, water and noise pollution offences. Section 48 of the Act requires a person to obtain an Environment Protection License from the NSW Environment Protection Authority before carrying out any of the premise-based activities described in Schedule 1 of the Act.

The Site is approved for activities which are consistent with the definition of 'Scrap metal processing' as per Clause 26(1) of Schedule 1 of the *Protection of the Environment Operations Act 1997*:

Scrap metal processing, meaning the crushing, grinding, shredding or sorting (but not smelting) of scrap metal of any kind.

'Scrap metal processing' is defined under Clause 26 as a form of 'Metallurgical activity'. Under Clause 26(2) of Schedule 1 of the *Protection of the Environment Operations Act 1997*, thresholds for 'Scrap metal processing' include:

- Capacity to process more than 150 tonnes of scrap metal per day or 30,000 tonnes per year (if not carried out wholly indoors) or 50,000 tonnes per year (if carried out wholly indoors).

Exceedance of these thresholds triggers the requirement for an EPA licence.

The Site will receive principally scrap ferrous metal for sorting, size reduction and transport off-site for further recycling. Most operations are conducted outdoors.

The Site will process less than 150 tonnes per day of scrap metal and less than 30,000 tonnes per year. The Site is therefore under the threshold and therefore no EPA licence is required (as long as thresholds are not exceeded).

2.2. Protection of the Environment Operations (Waste) Regulation 2014

During 2013-14 the EPA carried out an extensive review and consultation process on NSW's waste regulatory framework. The result was the *Protection of the Environment Operations (Waste) Regulation 2014* (the Waste Regulation).

The Waste Regulation improves the EPA's ability to protect human health and the environment and paves the way for a modern and fair waste industry in NSW. The EPA rolled out the new rules stipulated under the Waste Regulation in stages over 2014-2017.

These changes include amended thresholds for environment protection licences and reforms to the waste levy system.

The Waste Regulation is supported by the Waste levy guidelines. These guidelines specify how to measure waste to calculate waste levy liability, the deductions waste operators can claim, and the EPA's requirements for records, surveys and reports. All licensed processing, disposal, recycling and storage facilities within the metropolitan levy area or regional levy area are subject to the levy system.

As the Proposal is defined as a 'Metallurgical activity' as per Schedule 1 of the *POEO Act 1997*, the Proposal is not a scheduled activity and is not a waste facility, meaning no weighbridge is required. However, weighbridges are proposed for trade purposes.

2.2.1. Waste Hierarchy

To support the efficient use of resources in NSW, a waste hierarchy has been established by the NSW Government in the *Waste Avoidance and Resource Recovery Act 2001*. The waste hierarchy sets out preferred actions in a 'hierarchy' from most preferred to least preferred to minimise the impact of waste on the environment and public health. The waste hierarchy actions (from most preferred to least preferred) are outlined as follows:

1. Avoidance including action to reduce the amount of waste generated by households, industry and all levels of government;
2. Resource recovery including re-use, recycling, reprocessing and energy recovery, consistent with the most efficient use of the recovered resources; and
3. Disposal including management of all disposal options in the most environmentally responsible manner.

The waste hierarchy has been established to guide the appropriate management of waste in NSW by the community, councils, businesses and the NSW Government. The waste hierarchy is underpinned by Ecologically Sustainable Development principles as defined in the *Protection of the Environment Operations Act 1997*. The waste hierarchy is summarised in **Error! Reference source not found..**

The waste hierarchy has guided the development of this plan.

Figure 2.1. The waste hierarchy underpinning the NSW Waste Avoidance and Resource Recovery Act 2001.



2.3. Classification of waste streams

Classifying waste into groups that pose similar risks to the environment and human health facilitates their management and appropriate disposal.

The following classes of waste are defined in clause 49 of Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) and the NSW EPA's *Waste Classification Guidelines* (2014):

- Special waste;
- Liquid waste;
- Hazardous waste;
- Restricted solid waste;
- General solid waste (putrescible); and
- General solid waste (non-putrescible)

Where waste cannot be avoided, reused or recycled it will be classified and appropriately disposed of. The classification of waste is based on the Waste Classification Guidelines (NSW EPA, 2014). The guideline outlines how to assess waste, waste classification and sets out management options for the disposal of classified waste.

Waste classification will involve one or more of the following steps:

1. Establish if the waste should be classified as special waste;
2. If not special waste, establish whether the waste should be classified as liquid waste;
3. If not special waste or liquid waste, establish whether the waste is of a type that has already been pre-classified;
4. If the waste is not special waste, liquid waste or pre-classified, establish if it has certain hazardous characteristics and can therefore be classified as hazardous waste;
5. If the waste does not possess hazardous characteristics, it needs to be chemically assessed to determine what class of waste it is. If the waste is not chemically assessed, you must manage the waste as if it were hazardous waste; and
6. If the waste is chemically assessed as general solid waste, a further test is available to determine whether the waste is putrescible or non-putrescible. This test determines whether the waste is capable of significant biological transformation. If you do not wish to undertake this test, you must manage the waste as if it were general solid waste (putrescible).

The EPA's Waste Classification Guidelines provide a clear framework for accepting, testing and determining the management options for waste received to ensure human health and the environment are protected.

The proposed development will only receive scrap metal for processing; therefore, no waste will require classification or tracking.

2.4. NSW Environmental Planning Instruments and Policies

2.4.1. Secretary's Environmental Assessment Requirements (SEARs)

Table 2.1 outlines the information requirements related to waste management specified in SEARs 2038.

Table 2.1. SEAR 2038 requirements relating to waste management.

SEAR Information Requirement	Location of Information
Details of the type, quantity, and classification of waste to be received at the site	Section 3 of this report
Details of the resource outputs and any additional processes for residual waste	Section 3 of this report.
Details of waste handling including transport, identification, receipt, stockpiling and quality control	Section 3 of this report.
The measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the <i>NSW Waste Avoidance and Sustainable Materials Strategy 2041</i> .	Section 2.1 of this report.

2.5. Goulburn Mulwaree Development Control Plan 2009

There are no specific development controls relating to the preparation of a Waste Management Plan for the proposed development. However, Council provides general guidance for the preparation of such plans, as outlined in Section 2.6 below.

2.6. Goulburn Mulwaree Waste Management Guide for Developers

The Goulburn Mulwaree Waste Management Guide for Developers has been prepared to assist developers in considering effective waste management practices for both residential and non-residential developments. The guidance provided is of a general nature and may not be applicable to all development types. All documentation submitted to Council as part of a Development Application is assessed on a case-by-case basis to ensure suitability to the specific proposal.

Table 2.2 outlines the key considerations that must be addressed by the developer in preparing the Waste Management Plan.

Table 2.2. Council key consideration for waste management plan.

Council Consideration	Addressed in Proposal
Council provides non-residential waste services for general waste collection within the collection zone. Recycling and organic waste services are not currently available. Rural collections may be available by negotiation dependant on location.	The development will not rely on Council kerbside services. All residual and recyclable waste generated on-site will be transported directly to the Goulburn Waste Management Centre by licensed waste transporters.
Waste management considerations need to be addressed as part of the Development Application. For example, this could be either a dedicated section of a document such as a Statement of Environmental Effects or a separate Waste Management Plan, submitted to Council as part of the Development Application.	Waste management provisions have been detailed in this Waste Management Plan, submitted alongside the Development Application. The Plan outlines all storage, processing, and disposal methods for the proposed operations, consistent with Council's expectations for non-residential developments.
Plans submitted to Council as part of the Development Application must show the following: 1. The storage and collection location of waste receptacles, including the quantity and size of bins; 2. Adequate access and turning paths for waste collection vehicles to meet engineering requirements.	The submitted site plans clearly identify the location, size, and capacity of all waste storage areas, including the unprocessed metal zones, processing zones, and processed recovery bays. The plans also illustrate vehicle access points, bin placement areas, and internal circulation to demonstrate compliance with engineering access requirements.
Wherever possible, the site must be configured to allow waste collection vehicles to enter and exit the site in a forward direction. Access roads must be built to Council standard in order for Council to enter the land for waste collection	The site layout enables waste transport vehicles to enter and exit the premises in a forward direction. Internal access roads and manoeuvring areas are designed to Council standards, ensuring safe and efficient vehicle operation during waste collection and transfer activities.

2.7. Strategic Drivers

2.7.1. NSW Waste and Sustainable Materials Strategy 2041

NSW Waste and Sustainable Materials Strategy 2041: Stage 1 – 2021-2027 outlines the actions NSW will take over the next six years – the first phase of the strategy – to deliver on a set of long-term objectives. The strategy is by \$356 million in funding to help deliver priority programs and policy reforms, including:

- Phasing out problematic single-use plastic items;
- Financial incentives for manufacturers and producers to design out problematic plastics;
- Having government agencies preference recycled content and invest in research and pilots for recycling innovation;
- Introducing tighter environmental controls for energy from waste in NSW, with further consideration of planning and infrastructure needs underway;
- Mandating the source separation of food and garden organics for households and selected businesses; and
- Incentivising biogas generation from waste materials.

Specific targets focus on the environmental benefits and economic opportunities in how we manage our waste, and includes the following:

- Reduce total waste generated by 10% per person by 2030;
- Have an 80% average recovery rate from all waste streams by 2030;
- Significantly increase the use of recycled content by governments and industry;

- Phase out problematic and unnecessary plastics by 2025;
- Halve the amount of organic waste sent to landfill by 2030;
- Reduce litter by 60% by 2030 and plastics litter by 30% by 2025; and
- Triple the plastics recycling rate by 2030.

To complement this strategy, NSW also released the following documents:

- *NSW Plastics Action Plan*, which sets out how we will phase out problematic plastics, tackle litter from plastic items like cigarette butts, and support innovation and research; and
- *NSW Waste and Sustainable Materials Strategy: A guide to future infrastructure needs*, which sets out the investment pathway required for NSW to meet future demand for residual waste management and recycling.

A major focus area of the strategy is to increase waste infrastructure and services to meet our future needs. The highest priority is to extend the life of existing landfills by reducing the volumes of waste being sent to landfill. Whilst the main focus is on waste avoidance, improving recycling capacity is an important aspect of waste management.

This Proposal will contribute towards the recycling targets of NSW and help achieve a more circular economy through recycling and re-using of materials. The Proposal will help facilitate the use of recycled materials through the recycling of metals, replacing the use of virgin materials and minimising metals disposed of in landfill.

The scrap metal recycling facility will have an average recycling rate of 74%. However, further recycling at offsite facilities licensed to accept the floc material will provide further opportunities for recovery. The overall waste recovery rate during construction is estimated to exceed 99.9%. Estimated office waste recovery is 88%. On average, the recycling rate of the facility will be higher than the 80% recovery rate goal for 2030.

2.7.2. NSW Waste and Sustainable Materials Strategy: A Guide to Future Infrastructure Needs

The *NSW Waste and Sustainable Materials Strategy: A Guide to Future Infrastructure Needs* is a supplement to the *NSW Waste and Sustainable Materials Strategy 2041*. The guide outlines the emerging needs in NSW's waste and circular economy infrastructure network. The needs have been grouped by material types with a focus on materials commonly found in municipal solid waste (MSW) and commercial and industrial (C&I) waste streams. Significant gaps exist in the system for the reprocessing of some of these materials that have historically been exported for processing.

The guide sets out how the NSW Government will support the development of new infrastructure through facilitating infrastructure, e.g., through planning activities; investing in high priority projects; strategically planning for infrastructure with local communities; and aligning policy and regulation with the Strategy. The three key areas of focus, based on extensive analysis of material flows, current and planned capacity and proposed policy changes, are residual waste, organics and plastics.

The guide specifically addresses the current market, processing capacity, throughput and future needs, and the opportunities and challenges associated with processing waste materials across NSW.

Sydney Metal Traders is investing more than \$10 million into the NSW economy to develop the recycling infrastructure, helping to create new jobs, economic activity and supporting local communities. The investment will help bring forward 30,000 tonnes per annum of new recycling capacity in NSW, which will help accelerate progress towards landfill diversion targets.

3. Waste Management

Waste management practices outlined below address the economic, environmental and safety imperatives during operation of the facility. These enhanced management practices also produce triple bottom line benefits including financial efficiencies, sustainable construction methods and a safe work site for the duration of the construction process.

These positive outcomes will be achieved through thorough planning and procurement of exacting measurements reducing upfront costs of construction and preventing the generation of waste.

The benefits of the management practices outlined in the plans will be realised from the outset by both the business and the broader community in the form of reduced costs of disposal, reduced costs of legal liability and common good through:

- Minimising waste by manufacturing building components off site to design specifications;
- Maximising recovery of valuable resources;
- Exercising due diligence for safe disposal of waste; and
- Providing a safe worksite.

3.1. Demolition Phase

As part of the site preparation works for the Proposal, all existing trees within the designated operational area will be removed. This includes trees located within building footprints, access ways, and the proposed landscaped setback areas. The vegetation will be cleared and transported off-site to a licensed recycling facility. Based on the extent of tree removal shown in the plan (See figure 3.2), it is estimated that approximately **20 tonnes** of green waste (tree trunks and branches) will be generated and **100%** of this material will be recycled through approved green waste processing services. See table 3.1 for estimated vegetation removed.

Table 3.1 Estimate vegetation Demolition.

Waste Type	Waste Identified	Waste Description	Disposal Method	Suggested Receiving Facility	Tonnes	Recycling Rate
General Solid Waste (non-putrescible)	Trees	Removal of trees within the operational area	Off-site recycling	Goulburn Waste Management Centre	20	100%
TOTAL Amount of waste generated (tonnes)						20
TOTAL Amount of waste recycled (tonnes)						20
Overall recycling rate						100%

3.2. Construction Phase

The construction period for the proposed development is expected to span approximately six months following receipt of development consent. The works will be undertaken in the following three stages, each generating specific types and volumes of construction waste. This WMP aims to minimise environmental impact by maximising reuse and recycling and ensuring compliant disposal practices.

Stage 1 – Site mobilisation:

- Services search;
- Establishment of environmental management measures including erosion and sediment controls;
- Establish site access, laydown areas; and
- Establishment of stockpile sites.

Stage 2 – Site Preparation Activities:

- Removal of vegetation; and

- Site levelling and fencing.

Stage 3 – Bulk Earthworks, Drainage & Hardstand Construction Activities:

- Excavation and grading;
- Installation of stormwater and drainage systems;
- Utility trenching and connections;
- Construction of hardstand areas including HDPE liner placement' and
- Delivery and installation of mobile metal shredding equipment.

Stage 4 – Conversion of Residential Building to Administration Offices Activities:

- Internal retrofitting and fit-out of the office;
- Installation of fixtures, furniture, and equipment in the office; and
- Upgrade and refurbishment of the On Site Sewage Management System (OSSM).

Stage 5 – Intersection Upgrade Works:

- Excavation and grading of the intersection upgrade area;
- Construction of road pavement layers, including placement and compaction of roadbase materials;
- Asphalt paving and surfacing works;
- Installation of concrete barriers and associated traffic safety infrastructure; and
- Installation of road signage, line marking and other traffic control devices.

Key Site Infrastructure Works:

As part of the overall development, various supporting infrastructure components will also be constructed. These include:

- Three sediment basins and a 1,000 m² biofiltration basin to manage and treat stormwater runoff;
- A 300 m² effluent disposal area to support on-site wastewater management;
- A self-bunded fuel storage tank (50,000L capacity) installed on a bunded concrete pad, with an underground 10,000L spill containment tank;
- A 20-metre-wide landscaped setback along the site boundary and 4-metre-high acoustic walls to reduce visual and noise impacts;
- Internal roadways formed with compacted road base, designed for the safe movement of heavy vehicles (including B-Double and HRV trucks);
- A weighbridge system to support incoming and outgoing material tracking;
- A gatehouse for site access control and logistics management;
- Designated staff and visitor parking areas;
- Retained existing dams for potential stormwater reuse or emergency supply; and
- Construction of key operational buildings and infrastructure, including a shredder shed, workshop and amenities, storage shed and depollution bay, hammer mill and cyclone plant, and the conversion of an existing residential building into administration offices.

These components are integral to the long-term functioning of the metal recycling facility and will be constructed progressively throughout the nominated construction stages.

The waste streams generated on site during the construction phase are summarised in Table 3.2 below. Concrete, timber, metal, soil, and plastics will be generated during site preparation, bulk earthworks, and the conversion of the

existing residential building to administrative use. These materials will be appropriately segregated on site to maximise recovery, stored in separate hook lift bins, and transported off-site for recycling or lawful disposal at the Goulburn Waste Management Centre or other licensed local facilities.

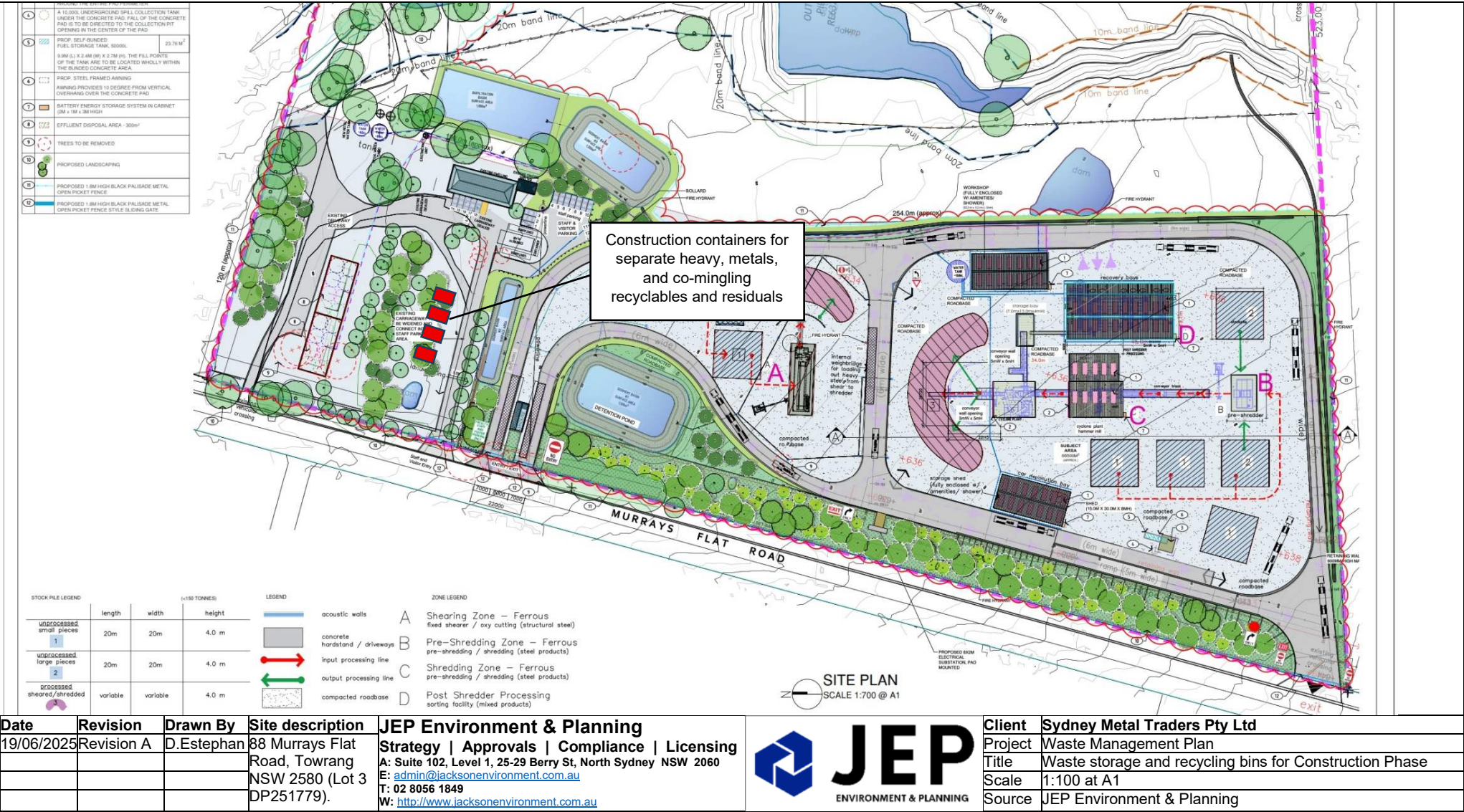
The amount of soil material leftover that is generated by leveling and preparing the Site will be taken off-site for reuse under the relevant Resource Recovery Order and Exemption. The majority of this material is expected to be Excavated Natural Material / Virgin Excavated Natural Material. Based on the cut and fill plan in the stormwater and civil design for the Proposal, the amount will be approximately 33,826 m³. At 1,600kg/m³ average bulk density, this would equal equivalent to 54,122 tonnes.

The overall waste recovery rate during construction is estimated to exceed 99.99%. All waste handling will be undertaken in accordance with relevant environmental legislation and EPA requirements, supporting responsible resource recovery and minimising environmental impact.

Table 3.2 Estimate waste generation during construction phase.

Waste Type	Waste Identified	Waste Description	Reuse/recycling/ Disposal Method	Suggested Receiving Facility	Estimated Tonnes	Recycling rate
General Solid Waste (non- putrescible)	Soil	Soil removed under pavement for stormwater drainage upgrade, spill containment and footings. Removal of Vegetation and site levelling (for the Site and for the intersection upgrades at Murrays Flat Road and the Hume Hwy)	On-site recycling	Beneficially reused under a VENM Certificate or the EPA's <i>Excavated Natural Material Resource Recovery Order</i> 2014	54,602	100%
	Construction waste – “heavy”	Asphalt, concrete from the installation of foundations and services	Off-site recycling	Goulburn Waste Management Centre	7.5	90%
	Construction waste - metal	Ferrous metal off-cuts	Off-site recycling	Goulburn Waste Management Centre	2.5	100%
	Construction waste – “light”	Timber, packaging, glass, plastic, rubber, plasterboard, and ceramics	Off-site recycling/ disposal	Goulburn Waste Management Centre	3.5	40%
	Grit, sediment, litter and gross pollutants	Collected in, and removed from, stormwater treatment devices and/or stormwater management systems	On-site recycling	Goulburn Waste Management Centre	10.5	100%
	Site office waste	Paper, cardboard and co-mingled recycling.	Off-site recycling	Goulburn Waste Management Centre	0.75	100%
Hazardous	Waste oils, fuels, lubricants and chemicals	Waste oils and containers that previously contained Class 1, 3, 4, 5 or 8 substances used for construction plant	Off-site recycling / disposal	Goulburn Waste Management Centre	0.75	0%
General Solid Waste (putrescible)	Site office waste	Generated from worker's lunches.	On-site recycling	Goulburn Waste Management Centre	0.75	0%
TOTAL Amount of waste generated (tonnes)						54,627
TOTAL Amount of waste recycled (tonnes)						54,623
Overall recycling rate						99.99%

Figure 3.1. Placement of waste storage and recycling bins during the construction phase in red boxes.



Date	Revision	Drawn By	Site description	JEP Environment & Planning
19/06/2025	Revision A	D.Estephan	88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779).	Strategy Approvals Compliance Licensing A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au



Client	Sydney Metal Traders Pty Ltd
Project	Waste Management Plan
Title	Waste storage and recycling bins for Construction Phase
Scale	1:100 at A1
Source	JEP Environment & Planning

Figure 3.2 Proposed demolition plan, showing the trees to be removed (red cricles).



Date	Revision	Drawn By	Site description	JEP Environment & Planning	Client	Sydney Metal Traders Pty Ltd
19/06/2025	Revision A	D.Estephan	88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779).	Strategy Approvals Compliance Licensing A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	Project	Waste Management Plan
					Title	Demolish Pan
					Scale	1:100 at A1
					Source	JEP Environment & Planning

[illegible]

3.3. Operational Phase

The Site will receive up to 30,000 tonnes per year of scrap metal for sorting and processing. All incoming vehicles will first pass over the inbound weighbridge located at the entrance to the Site. This weighbridge is positioned prior to the main operational area to ensure all loads are recorded before proceeding further. Once weighed, vehicles will move to the gatehouse, where loads will be visually assessed and directed to the appropriate unloading area depending on the type and source of material.

Upon entry into the operational area, vehicles will be directed to one of several designated unloading zones:

- Depollution Bay: A sealed and bunded area for end-of-life vehicles (ELVs), where fluids, batteries, and other hazardous components are safely removed prior to further processing; and
- Ferrous and Non-Ferrous Zones: Areas allocated for the unloading of bulk commercial scrap metal, including steel, aluminium, copper, and other materials.

A series of mechanical processes are carried out on-site to prepare materials for shredding and maximise resource recovery:

- Oxy-Cutting: Oversized and heavy ferrous materials that cannot be processed by the shear are manually cut down to size using oxy-cutting equipment. These materials are then either processed through the shear or stockpiled within the cutting area.
- Stationary Shearing: Large ferrous items such as beams, plate steel, and fabricated sections are processed using a stationary shear. The shear reduces the materials to transportable lengths suitable for either direct sale or further shredding. A dedicated stockpile area adjacent to the shear is used to store pre-processed materials.
- Pre-Shredding: Materials such as car bodies are introduced into a pre-shredder prior to being processed by the hammermill. The pre-shredder homogenises the feedstock, detects unshreddable or explosive items (e.g., gas bottles), and reduces noise and vibration during hammermill operation. Materials from the pre-shredder are transferred via conveyor to the main shredder.
- Shredder/Hammermill: Materials are processed through a hammermill either directly from stockpile or after pre-shredding. The shredder reduces scrap metal into smaller, manageable pieces, lowering storage volume and transport requirements. Outputs from this process include fragmented ferrous and non-ferrous metals, as well as non-metallic residue (floc).
- Downstream Separation: The output from the shredder is conveyed to a downstream plant, beginning with a drum magnet that extracts ferrous metals. These are conveyed to a picking station for manual sorting, then stockpiled in dedicated bays. Non-ferrous metals and floc are directed to an Eddy Current Separator (ECS), where non-ferrous metals are separated from light fractions such as plastic, foam, and soil. Recovered non-ferrous metals are stored in covered bunker bins.
- Floc Management: Floc, which makes up approximately 20 to 30% of the processed output by weight, is conveyed to a covered and bunded containment bay to prevent discharge of contaminants into the Site's stormwater system. This material will be regularly transported off-site to a licensed waste facility for appropriate disposal or recovery. Refer to Figure 3.3 which identifies the process for Site operations.

3.3.1. Waste accepted at the site

The Facility is designed to process up to 30,000 tonnes per annum (tpa) of ferrous and non-ferrous scrap metals through receipt, sorting, cutting, shredding and storage operations. Materials accepted for processing are ferrous and non-ferrous metals of various sizes comprising:

- | | |
|----------------|-------------|
| • Steel | • Aluminium |
| • Carbon Steel | • Copper |
| • Alloy Steel | • Lead |
| • Cast Iron | • Zinc |

- White Goods
- Cars
- Sheet Metals
- Tin
- Batteries
- Stainless Steel

Processed ferrous and non-ferrous materials will be stored in separate covered bays pending transportation. Outbound trucks will be loaded from the Site's stockpile areas and directed back to the weighbridge to record the net weight of recovered materials. Vehicles will then exit the Site via the designated egress point, completing the one-way operational flow. This looped traffic system minimises on-site congestion, improves safety, and ensures accurate waste tracking and reporting.

Estimated output materials from the shredding and separation processing of scrap metals is summarised in Table 3.3. The overall recycling rate of the scrap metal received is estimated at 74%. However, further recycling at offsite facilities licensed to accept the floc material will provide further opportunities for recovery.

Table 3.3. Summary estimate of export forecasts of shredded scrap metal and residuals. Actual may vary.

Export material	Annual Tonnes	Destination	Overall Estimated Percentage
Ferrous metals	18,000	International shipment and/or local destinations.	60%
Non-ferrous metals	4,000	Local destinations.	13.33%
Floc	8,000	Eastern Creek Resource Recovery Park	26.67%

3.3.2. Metal stockpile areas

The site layout is divided into distinct operational zones to manage the receipt, processing, and storage of different metal waste streams. The Unprocessed Metal Zones (Areas 1 and 2) are designed for the storage of small-sized/undersized and large-sized/oversized scrap metal prior to processing, with each pad accommodating a maximum pile size of 1,600 m³.

The Processing Zones include the fixed shearer and shredding areas, represented by the pink curved stockpile pads, which are used to store sheared or shredded ferrous material prior to recovery. Adjacent to these are the Processed Metal Recovery Bases, which comprise six dedicated bays for specific recovered material types, including stainless steel (SUS), copper and aluminium (Cu/Al), wire, 15–120 mm plastic, ferrous iron (Fe iron), and floc/fluff.

These recovery bays are located within the shredder building and are designed for smaller, high-value or specific waste streams, each with a maximum volume of 10 m³. Based on the calculated stockpile capacities, the total maximum volume of metals that can be stored on site at any point in time is 16,580 m³ and the maximum tonnage of metals that can be stored at any point in time is 14,354 tonnes.

The approximate maximum volume and tonnages for each stockpile is provided in Table 3.4.

Table 3.4. The approximate maximum volume and tonnages for each stockpile stored on site.

Stockpiling Area	Types of materials to be received and processed	Source	Waste classification	Maximum volume of metals stored in each area (m ³)	Area of stockpile (m ²)	Length of stockpile (m)	Width of stockpile (m)	Height of stockpile (m)	Bulk Density (Tonnage / m ³)	Maximum amount of each stockpile (tonnes)
Unprocessed Metal Area 1 Zone A	Unprocessed Small Sized / Undersized	Businesses	General solid waste (non-putrescible)	1,600		20	20	4	0.5	800
Unprocessed Metal Area 1 Zone C	Unprocessed Small Sized / Undersized	Businesses	General solid waste (non-putrescible)	1,600		20	20	4	0.5	800
Unprocessed Metal Area 1 Zone C	Unprocessed Small Sized / Undersized	Businesses	General solid waste (non-putrescible)	1,600		20	20	4	0.5	800
Unprocessed Metal Area 1 Zone C	Unprocessed Small Sized / Undersized	Businesses	General solid waste (non-putrescible)	1,600		20	20	4	0.5	800
Unprocessed Metal Area 2 Zone B	Unprocessed Large Sized / Oversized	Businesses	General solid waste (non-putrescible)	1,600		20	20	4	1.1	1,760
Unprocessed Metal Area 2 Zone C	Unprocessed Large Sized / Oversized	Businesses	General solid waste (non-putrescible)	1,600		20	20	4	1.1	1,760
Processed Metal Stockpile sheared/shredded #1 Zone A	Sheared/shredded (fixed shearer / oxy cutting (structural steel))	Businesses	General solid waste (non-putrescible)	2,396	599	variable	variable	4	1.1	2,636
Processed Metal Stockpile sheared/shredded #2 Zone C	Sheared/shredded (Shredding zone - ferrous and post shredder processing)	Businesses	General solid waste (non-putrescible)	4,524	1,131	variable	variable	4	1.1	4,976
Processed Metal Stockpile Recovery Bases	Stainless Steel (SUS)	Businesses	General solid waste (non-putrescible)	10			2.5	4	0.5	5
	Copper and Aluminium (Cu/Al)	Businesses	General solid waste (non-putrescible)	10			2.5	4	0.2	2

Stockpiling Area	Types of materials to be received and processed	Source	Waste classification	Maximum volume of metals stored in each area (m ³)	Area of stockpile (m ²)	Length of stockpile (m)	Width of stockpile (m)	Height of stockpile (m)	Bulk Density (Tonnage / m ³)	Maximum amount of each stockpile (tonnes)
	Wire	Businesses	General solid waste (non-putrescible)	10			2.5	4	0.5	5
	15-120mm Plastic	Businesses	General solid waste (non-putrescible)	10			2.5	4	0.3	3
	Ferrous iron (Fe Iron)	Businesses	General solid waste (non-putrescible)	10			2.5	4	0.5	5
	Floc/fluff	Businesses	General solid waste (non-putrescible)	10			2.5	4	0.2	2
TOTALS				16,580						14,354
Maximum volume of metals that can be stored on site at any point in time (m³)				16,580						
Maximum tonnage of metals that can be stored on site at any point in time (tonnes)				14,354						

3.3.3. Non-conforming waste materials

Non-ferrous metals will be stored in a designated bay, while floc will be retained in a sealed containment area to minimise environmental impact. Shredder floc is a by-product of scrap metal recycling. Shredder floc can consist of bits of plastic, rubber, textiles, metals, dirt and glass (see Table 3.5). Floc will be contained in a sealed bunker, or floc bay, as the material can be contaminated with heavy metals, oils and hydrocarbons.

Table 3.5. Average shredder floc composition.

Material type	Average composition range (% weight)
Plastics	35 – 55%
Rubber	10 – 20%
Metals	6 – 13%
Textiles	7 – 15%

Floc is discharged via a covered conveyor into a separate covered and contained 25-30m³ skip or hook bin (10 tonne capacity) within a designated concrete block bunker. This will minimise any discharge of oil, grease and other potential pollutants to the Site's stormwater pit. Floc will comprise an estimated 20 to 30% of the input stream. Floc will be regularly transported to a licensed facility that can accept this waste.

Non-conforming waste material may occasionally be received at the Site. Non-conforming material is any hazardous or dangerous waste that is unknowingly brought on-site. Prohibited (non-conforming) materials include:

- Rechargeable batteries;
- Radioactive materials;
- Pressure vessels (gas cylinders, LPG tanks);
- Flammable chemicals or materials, including residuals in drums or tins;
- Toxic, poisonous or infectious materials or residual wastes;
- Refrigerants or ozone depleting gasses;
- Safes;
- Tyres (individual units without rims);
- Transformers (without PCB free certificate);
- Asbestos; and
- Batteries that contain nickel, cadmium, lithium or alkaline;
- Explosives;
- Accumulators;
- Corrosive materials;
- Hazardous materials, wastes or residual material;
- Chemicals, including residual in drums or tins;
- Electronic wastes;
- Boilers (without asbestos free certificate);
- Storage tanks (without clean certificate);
- Putrescible waste.

3.3.4. Site access

Vehicular access to the Site will be provided via three (3) driveways. One (1) driveway on the northern side of the Site will serve the administration office, one (1) driveway on the northern side will accommodate truck movements, and one (1) driveway on the southern side of Murrays Flat Road will be utilised by heavy vehicles during operational activities.

A newly constructed 22-metre-wide access driveway located adjacent to the administration office (to the north) will act as an entry and exit driveway for trucks only. A second access driveway located on the southern corner of the Site will be utilised as an exit-only driveway for trucks, with a width of 20 metres. These access arrangements are designed in accordance with AS2890.2:2018 and are considered adequate for heavy vehicle movements.

The existing access driveway is to be widened to allow two vehicles to pass each other and will serve staff and visitor vehicles, with a width of 5.8 metres, consistent with a low-volume (Category 1) access driveway in accordance with AS2890.1:2004 (Table 3.2). The existing driveway is located more than 6 metres from the tangent point of the adjacent kerb line, in accordance with Figure 3.1 of AS2890.1:2004.

All vehicular access is to be located and constructed in accordance with the approved design plans and relevant standards (AS2890.1:2004 and AS2890.2:2018), ensuring that vehicles are able to enter and exit the Site in a forward direction at all times. A clear sight line triangle (2.5 m x 2 m) is provided on the exit side of the driveway to maintain safe visibility between drivers and pedestrians. Incoming waste tracking and classification

The tracking, monitoring and recording of material movement onto and off site is via an electronic software system. The Data System is the electronic software system that generates and records the data for tracking, monitoring and recording the material movements on-site. This includes the weighbridge systems, scales, input and output material tracking systems, material grade/type and quality and customer details.

Details are recorded at four (4) primary locations:

- Site ingress weighbridge / scales where details such as load type, vehicle weight, vehicle registration, date and time are recorded;
- Unloading where the load is inspected to confirm ingress details and identify non-conforming waste materials;
- Egress weighbridge / scales where here details such as load type, vehicle weight, vehicle registration, date and time are recorded and confirmed; and
- When product is on sold to customers / exported.

All stages are monitored and recorded by cameras.

Further details of the waste monitoring are provided in the Waste Monitoring Program

3.3.5. Incoming waste inspections

The following procedure is followed when a truck enters the Site and is directed to the verified weighbridge:

- Trained personnel inspect the entire top of each load from an elevated inspection point in person or by using a video camera connected to a monitor and determine whether or not the load contains any non-conforming waste;
- Where the load is identified as containing, or is reasonably suspected to contain, any non-conforming waste, the entire load of waste is rejected, and the truck driver is instructed to immediately leave the Site;
- Where the load is not rejected, the details of the vehicle and waste materials are recorded and direct the driver to proceed directly to the appropriate unloading areas;
- The entire load is then tipped in the appropriate unloading areas as directed by the weighbridge personnel;
- The entire load is then spread and visually inspected by trained personnel for any non-conforming waste materials;
- If non-conforming materials are received and identified during unloading, the waste material is returned to the vehicle from which they were delivered and the truck driver is instructed to immediately leave the Site;
- Accepted waste that can lawfully be received at the Site can then be processed and stored appropriately;
- Non-conforming waste material found after unloading are temporarily stored site. The material is then taken to a facility appropriately licensed that accepts that type of waste. Stores of material are cleared as soon as reasonably practicable after receipt.

Recurring incidents of non-conforming waste being delivered to the Site will result in termination of approval to access the Site.

3.3.6. Record Keeping, retention and availability of records

Sydney Metal Traders will ensure that:

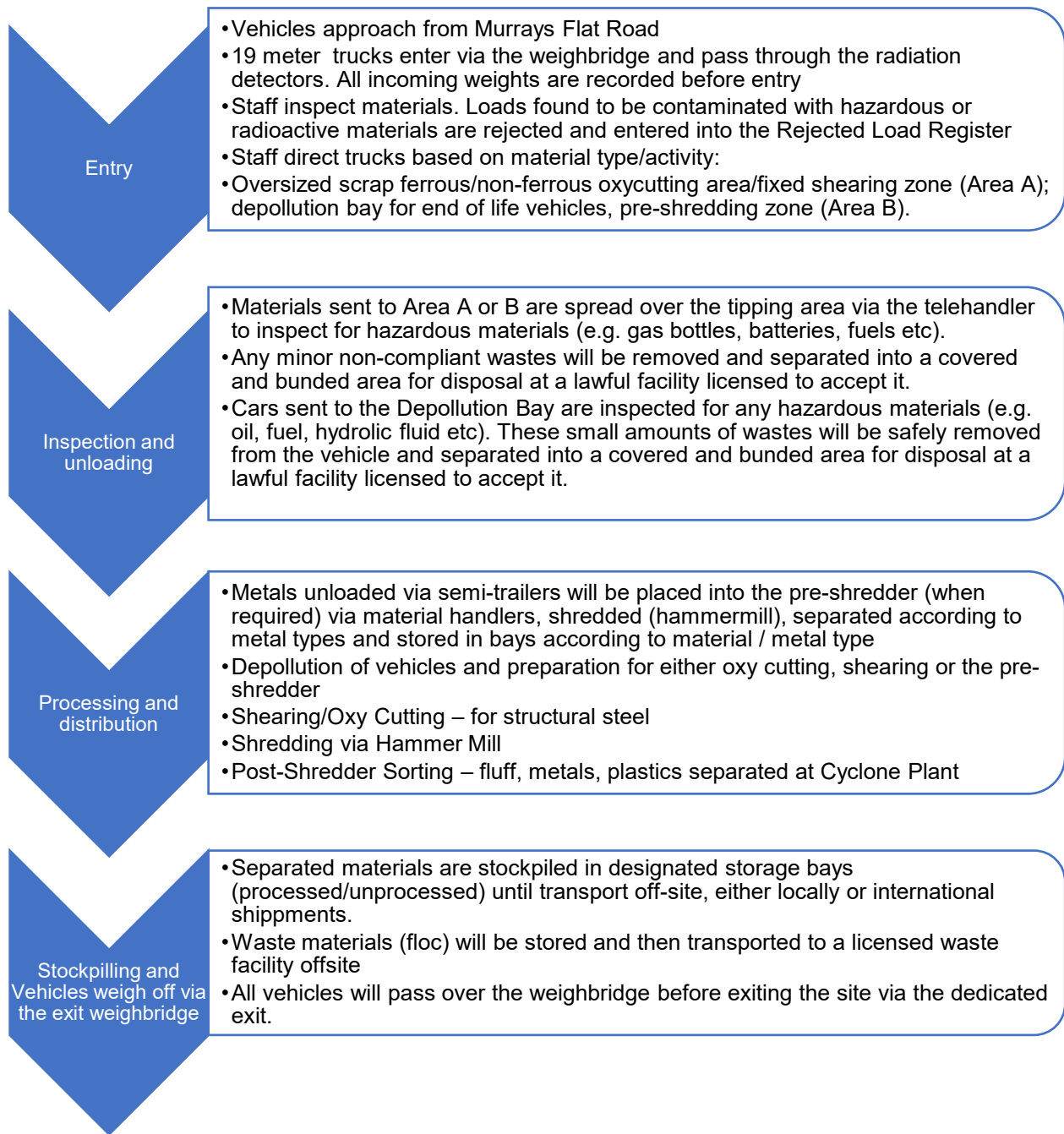
- The original records of the information (such as paper documents) are retained;
- All record-keeping systems are designed so that details of any adjustments to records are recorded against the adjusted record, including that the record has been amended and the extent of the change;
- All electronic records are backed up weekly and the back-up records are stored in a secure location;
- Quantity of waste is recorded.

Information will be record into the electronic data capture system connected to a verified weighbridge ('electronic data capture system'), unless:

- The weighbridge is out of operation; or
- The electronic data capture system malfunctions whilst the weighbridge continues to operate.

In these circumstances, the information required to be recorded for a transaction will be manually recorded and entered into the electronic data capture system as soon as the system resumes operation (with details confirming that the original recording was manual).

Figure 3.3. Process flow chart for Site operations.



3.4. Waste and Recycling measures – Office operations

The office operations associated with Sydney Metal Traders operations will generate waste from office administration and staff lunch activities. Whilst waste generation from these activities are considered minor, they need to be appropriately managed to ensure that waste is minimum and recycled in accordance with the waste hierarchy in the NSW Government's *Waste Avoidance and Resource Recovery Strategy 2014-2021* and the *Waste Avoidance and Resource Recovery Act 2011*.

The operation will generate minimal waste as part of the site office operations. However, a full co-mingled recycling system will be introduced into the office. Co-mingled recycling and general waste will be stored in separate bins in the waste storage area. An overview of waste generation and recycling estimates as part of the office operations is provided in Table 3.6. Waste generation and recycling estimates are from NABERS *Data and Measurement*

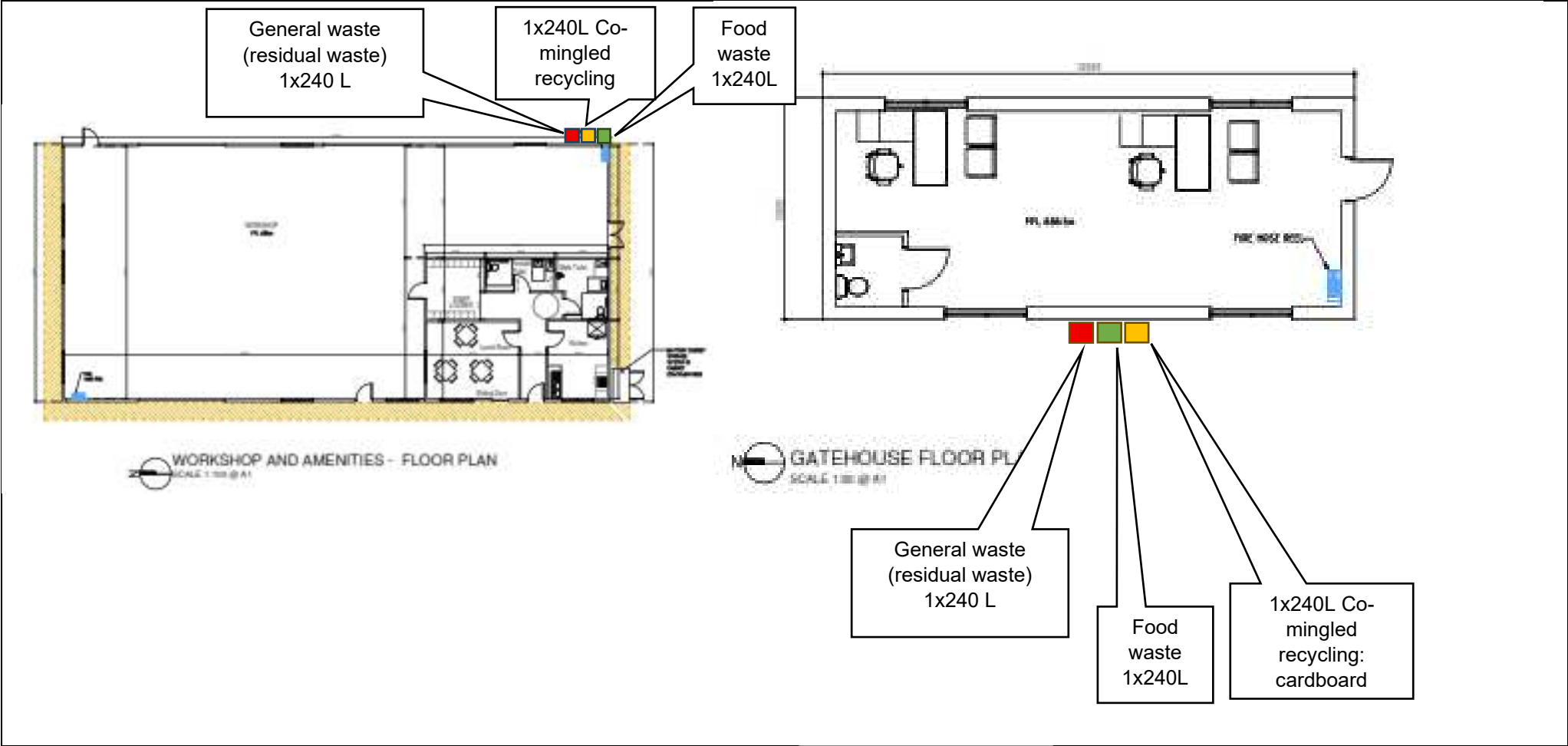
*Standard for Commercial Waste 2020*¹. Bin placement has been distributed across the office, gatehouse, and workshop to facilitate source separation. Figure 3.4 shows the location of all 240 L bins provided for general waste, co-mingled recycling, and food/organics.

¹ National Australian Built Environment Rating System (NABERS) (2020). *Data and Measurement Standard for Commercial Waste*.

Table 3.6. Waste and recycling measures during operations (office operations).

Key Waste Stream	Waste Generation per day per 100m ² floor area (for offices) (m ³)	Weekly waste generation (based on a 6 day working week and office floor area of 60m ²) (m ³)	Bulk density (t/m ³)*	Estimated tonnages per year (tonnes)	Segregation Areas / Containers	Reuse / Recycling / Disposal Method	Waste Type (NSW EPA Pre-classified Waste)	Suggest Receiving Facility	Recycling rate (%)
Co-mingled recycling: plastic / glass containers / metal cans / paper and cardboard	0.006	0.3438	0.2	3.58	1 x 240 L and 1x 120L wheelie recycling bin (emptied weekly or as needed)	Off-site recycling	General waste (non-putrescible)	Goulburn Waste Management Centre	100%
General waste (residual waste)	0.008	0.4584	0.087	2.07	2 x 240 L wheelie 'red' bin (emptied weekly or as needed)	Off-site recycling/ disposal	General waste (non-putrescible)	Goulburn Waste Management Centre	39%
Food and Garden Organics (FOGO)	0.005	0.2865	0.343	5.11	1 x 240 L wheelie recycling 'green' bin (emptied weekly or as needed)	Off-site recycling	Green waste (putrescible)	Goulburn Waste Management Centre	100%
TOTAL Amount of waste generated (tonnes)				10.76					
TOTAL Amount of waste recycled (tonnes)				9.49					
Overall recycling rate				88.2%					

Figure 3,4 Location of bins for Workshop and Amenities and Gatehouse.



Date	Revision	Drawn By	Site description	JEP Environment & Planning
19/06/2025	Revision A	D.Estephan	88 Murrays Flat Road, Towrang NSW 2580 (Lot 3 DP251779).	Strategy Approvals Compliance Licensing
				A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060
				E: admin@jacksonenvironment.com.au
				T: 02 8056 1849
				W: http://www.jacksonenvironment.com.au



Client	Sydney Metal Traders Pty Ltd
Project	Waste Management Plan
Title	Bin location
Scale	1:100 at A1
Source	JEP Environment & Planning

4. Environmental Risk Assessment

A risk assessment has been undertaken to identify the level of risk that construction and operations activities may present to waste management.

The following points summarise the key activities identified in the risk assessment relevant to waste management for construction works and operation of the Facility:

- Storage and management of floc from the shredding plant;
- Litter (e.g. food waste, packaging) from the site reaching local waterways;
- Leakage of vehicles during establishment and operational works;
- Excess packaging material deliveries increasing waste generated;
- Inappropriate reuse or disposal of waste items which may be hazardous;
- Fuel and oil spills during plant and equipment use and storage; and
- The location and storage of waste on site prior to reuse or disposal.

4.1. Incident Management – Spills

Spills on-site during construction and operational activities likely to occur are oils, fuel, paints and primers. To better manage a spill incident Spill Response Kits will be kept on-site at various clearly identified locations in easily accessible areas. The MSDS will be placed within sight and near spill kits. The MSDS has clear instructions on spill response management – clean up and disposal.

4.2. Environmental Control Measures

Table 5.1 provides the environmental control measures and safeguards that will be implemented to minimise waste generated during the construction and operation phases of the Facility.

Table 5.1. Environmental control measures.

Control Measures and Safeguards	Timing	Responsibility
Waste management and minimisation will form part of the induction program (which includes environmental due diligence training). All Project and site personnel will be trained in the requirements of this document including minimising wastes, recognising which types of materials are recyclable and their obligations to use recycling facilities provided on site.	Prior to starting on site / Ongoing	Site Manager
Clearly assign and communicate responsibilities to ensure that those involved in the construction are aware of their responsibilities in relation to the waste management plan	Prior to starting on site / Ongoing	Site Manager
Engage and educate personnel on how the various elements of the waste management plan will be implemented	Prior to starting on site / Ongoing	Site Manager
Specific locations for waste management (e.g. recycling bin locations, material stockpile locations) will be established on site and signposted appropriately.	Weekly checks	Site Manager
Waste management areas will be adequately managed to prevent sediment runoff and dust generation.	Daily	Site Manager
Construction Method Statements (CMS) will include practices to minimise waste generation and to maximise recycling and reuse of materials including oils, greases, lubricants, timber, glass, and metal.	Prior to start of construction and ongoing	Site Manager
Packaging minimisation and reuse initiatives will be implemented as part of the procurement.	Ongoing	Site Manager
Spill kit to be present on site in the case of any fuel leaks of plant and equipment during the construction phase of the development	Prior to start of construction	Site Manager
Segregated waste disposal containers for the collection and recycling/disposal of all waste streams generated during the construction and operation phases will be provided onsite. Waste disposal containers will have clear signage and instructions for use to avoid cross-contamination. No rubbish shall be disposed of on site.	Daily	Site Manager
Waste will be disposed to an appropriate licensed facility.	Daily	Site Manager
All waste being transported off site must be covered. The transportation must be appropriately licensed to carry that material.	Daily	Site Manager
Incompatible wastes will not be mixed.	Daily	Site Manager
Storage areas would be located away from waterways and the stormwater system.	Daily	Site Manager
Biodegradable products will be used wherever practicable.	Daily	Site Manager
Regular collection of wastes will ensure air emissions are at a satisfactory level. Waste and wastewater management systems will be regularly inspected and audited for ensure proper functioning.	Daily	Site Manager
Conduct regular litter patrols to ensure litter is effectively controlled on site.	Daily	Site Manager

5. 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 waste management issues. The induction will address:

- This waste management plan;
- Relevant legislation;
- Waste minimisation strategies;
- Waste recognition and recycling;
- Available recycling facilities; and
- Energy and water minimisation measures.

Records would 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 Site Manager.

6. Monitoring and Review

6.1. Inspections and Monitoring

Regular monitoring will be undertaken to track waste management on site (refer Table 6.1). This will be through a series of formal and informal inspections at regular intervals.

Table 6.1. Waste monitoring and review schedule.

Activity	Resources	Responsibility	Frequency
Daily Site inspections (work area)	Site Diary	Site Manager	Daily Issues recorded in Site Diary (by exception) when onsite
Weekly Environmental Inspection	Environmental Site Inspection Checklist	Site Manager	Weekly
Waste removal activities off site	Monthly Register for Waste Materials	Site Manager	Monthly

6.2. Auditing

Audits will be undertaken to assess the effectiveness of environmental controls and compliance with this plan and other relevant guidelines.

A schedule for internal audits providing frequencies and responsibilities is to be determined by the Site Manager as appropriate.

6.3. Environmental Management Review

The effectiveness and proper implementation of the WMP will be reviewed every twelve months or sooner as necessary. Review will be undertaken by the management team. The review will comprise:

- Reviewing the results of audits;
- Evaluation of the system, which improvements and corrective actions will be sought; and
- Evaluation of the operation of the WMP.

6.4. Continual Improvement

Continual improvement of this WMP 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:

- At least monthly (or as incidents occur):
 - Determine the root cause or causes of deficiencies;
 - Develop and implement a plan of corrective and preventative action to address deficiencies; and
 - Verify the effectiveness of the corrective and preventative actions.

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

Attachment 11: Site inspection Checklist

SITE INSPECTION CHECKLIST

Sydney Metal Traders
Scrap Metal Recycling Facility
88 Murrays Flat Road, Towrang

1. PURPOSE OF THIS PROCEDURE

To ensure the Site is operated in a safe and efficient matter, and to minimise off-site and environmental impacts

2. RESPONSIBLE PERSON

Operations Manager

3. ASSOCIATED INTERNAL DOCUMENTS

Operational Environmental Management Plan

4. DAILY SITE INSPECTION CHECKLIST

Date		
Item	Responsible Person	Comments/Corrective Actions
Sweep indoor floor areas		
Sweep outdoor hardstand areas		
Inspect outdoors areas, including perimeter fence for litter. Remove if necessary		
Ensure all wastes are fully contained within the correct storage bays		
Ensure all processed metal stockpiles are no more than 4 m high		
Ensure waste in skip bins does not exceed the top of the bin		
No materials or chemicals stored on/next to stormwater pits		
No materials or chemicals stored next to electrical equipment, plant, or potential ignition sources		
All chemicals stored according to Dangerous Goods classifications and in bunds		
Ensure spill kits are available, stocked and easily accessible		
Ensure gas cylinders are correctly secured and stored away from potential hazards		
Inspect process equipment for leaks		
Ensure fire hydrants and fire hose reels are easily accessible		
Inspect collection tanks and trays for oily water. Organise for disposal as required		
Raw scrap metal storage maximum storage limit		
Processed metal storage maximum limit of 14,354 tonnes or 16,580 m ³ (out of 30,000 tonnes received per annum)		

5. BI-ANNUAL SITE INSPECTION CHECKLIST

Date			
Item	Frequency	Responsible Person	Comments/Corrective Actions
Inspect all drainage structures including sedimentation basins and biofiltration system noting any dilapidation, carry out repairs	Six monthly or after significant rainfall		
Remove sediment and debris build up from spill containment / stormwater inlet pits via vacuum truck.	Six monthly or after significant rainfall		
Check pressure gauges on fire extinguishers. Organise testing/replacements if required	Six monthly		
Inspect fire hose reels. Organise testing if required	Six monthly		
Inspect and test fire system	Six monthly		
Check spill kits	Six monthly or immediately after use		
Check integrity of chemical storage bunds, clear debris if necessary	Six monthly or after a spill		
Check integrity of geosynthetic and clay membranes in the sedimentation basins and under operational areas to ensure fire water containment and no impacts to groundwater can occur	Six monthly or after a fire or spill		