PGH
ENVIRONMENTAL
PLANNING

Operations Management Plan

Waste Transfer Station
and associated light industry

Lot 3 SP 63491
Unit 3, 15 Lee Holm Drive
St Marys, NSW.

Report: Waste Transfer Station
and associated Light Industry
Lot 3 SP 63491
Unit 3, 15 Lee Holm Drive
St Marys NSW 2760

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CPP
CERTIFIED PRACTISING PLANNER

Report No:	Operational Management Plan 12-0414
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1 Background

The site is known as Lot 3 SP63491, Unit 3, 15 Lee Holm Drive, St Marys. It is a unit within an industrial unit development. The land is presently zoned IN1 General Industrial under Penrith Local Environmental Plan 2010.

This Operational Management Plan (the "**MP**") has been prepared to address the day-to-day operations of the development and provide an overview of the management controls to be implemented as part of the ongoing monitoring and review of development activities.

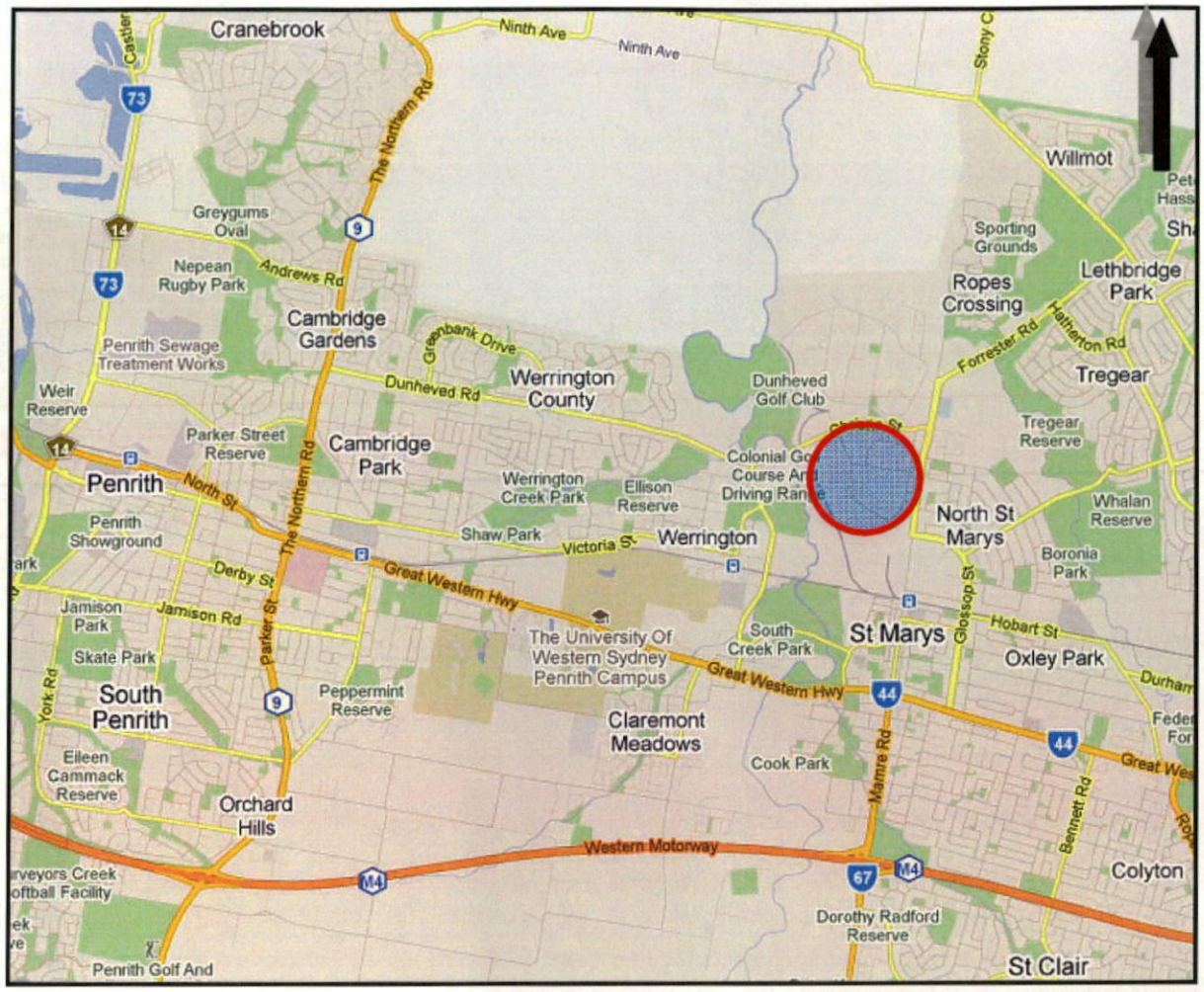
The EMP has been developed having regard to the planning principles adopted by the Land and Environment Court in the matter of *Renaldo Plus 3 Pty Ltd v Hurstville City Council [2005] NSWLEC 315*[1], namely:

1. Do the requirements in the Management Plan relate to the proposed use and complement any conditions of approval?
2. Do the requirements in the Management Plan require people to act in a manner that would be unlikely or unreasonable in the circumstances of the case?
3. Can the source of any breaches of the Management Plan be readily identified to allow for any enforcement action?
4. Do the requirements in the Management Plan require absolute compliance to achieve an acceptable outcome?
5. Can the people the subject of the Management Plan be reasonably expected to know of its requirements?
6. Is the Management Plan to be enforced as a condition of consent?
7. Does the Management Plan contain complaint management procedures?
8. Is there a procedure for updating and changing the Management Plan, including the advertising of any changes?

1.1 The Site

The site is known as Lot 3 SP63491, Unit 3, 15 Lee Holm Drive, St Marys. The site is located on the western side of Lee Holm Drive, St Marys; approximately 80metres to the south of the intersection with Christie Street and 800metres west of Forrester Road, in an industrial area of St Marys (refer **Figure 1**).

[1] http://www.lec.lawlink.nsw.gov.au/lec/principles/planning_principles.html



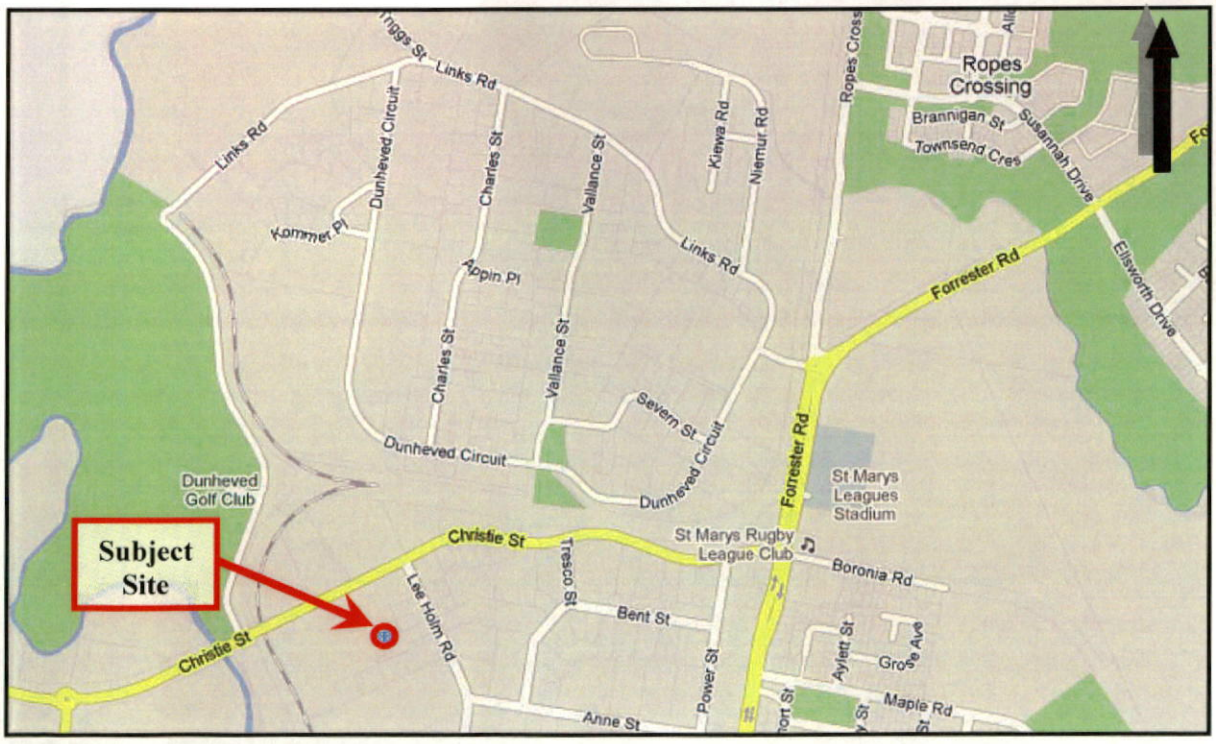


Figure 1 – Locality Map

Source: Whereis® Maps

Waste Transfer Station and Light Industry

Lot 3 SP63491
Unit 3, 15 Lee Holm Drive
St Marys

1.2 The Development

Anyfil Skip Bins Pty Ltd operates a skip bin business. This involves collection of waste in bins ranging in size from 3 cubic metres to 9 cubic metres. The bins are brought to the premises on a short term basis to be sorted. The waste typically involves construction waste (concrete, metals, gyprock, etc.). The waste will be transferred directly into the various sorting bins or may be place on the floor for sorting. After sorting into nominated bins (concrete, metals, gyprock, etc.) the sorted waste is transferred to an external waste recycling depot or to a land fill site. Provision is allowed for minor maintenance and repair of bins and equipment as required.

Annual quantities of waste for sorting is expected to range from between 6,240m^3 and 9,360m^2 per annum (120m^3 - 180m^3 per week).

It employs 5 full time employees and operates from 6am and 6pm Monday to Saturday (12 hours/day) and 9am and 1pm on Sunday (4 hours/day).

1.3 Key Components

The purpose of the MP is to provide a summary document that encapsulates the findings of the various studies undertaken as part of the development application. It will be used to implement the requirements of the development consent and associated studies.

The key components of the EMP are:

- Identification and contact details, with a brief description of development and a commitment that it will be operated in an environmentally sustainable manner.
- Legal requirements of the development, including applicable consents, approvals and/or licenses to operate.
- Information on the natural resources and amenity issues of the property and surrounding area.
- Identification of any environmentally sensitive or vulnerable resources by examining how the location, design and management of the development will interact with the environment.

- Monitoring and measurement of potential environmental impacts.
- Identification of key mitigation measures
- Contingency plans for emergency situations.
- Any environmental training undertaken by staff.
- Periodic review of the EMP to update changes in regulatory requirements, operation, environment, design or management.

2 Environmental Management

This section outlines the various areas of responsibility of the operator (Anyfil Skip Bins Pty Ltd).

2.1 Structure and Responsibility

The overall responsibility for the implementation of the MP will be the Directors of Anyfil Skip Bins Pty Ltd ("**the Company**").

2.2 Approval and Licencing Requirements

The company will adhere to WorkCover, Occupational Health and Safety procedures, and applicable Penrith City Council approvals in all activities.

There are no other specific licensing requirements relating to waste management for the scale of the proposed facility.

2.3 Emergency Contacts and Response

The company will provide a contact number in the event of an emergency. This contact number will be made available to Council and will be displayed at the entry to the site.

2.4 Monitoring, Reporting and Training

In order to monitor and record site operations it is proposed to undertake those items listed in the "Environmental Checklist". It is also intended to submit to Council annually (on or around the 30th June), a register of any "Complaints". Finally, all relevant environmental training undertaken by owners, managers and staff will be recorded (refer **Appendix 1**).

3 Implementation

Anyfil Skip Bins Pty Ltd aim to minimise environmental impacts of the development by ensuring all management practices comply with the relevant conditions of development consent and follow the principles of sound environmental management.

The Company has set in place this system to evaluate, monitor, record, manage and review environmental impacts. It agrees to review the plan at least every five (5) years. It will ensure all staff involved in the operation of the development are adequately educated in the awareness of environmental issues.

The Company agrees to abide by the requirements outlined in the plan

Signed ..... (Name/Title)

Date: .....

As a staff member employed by the Company, I understand and agree with the requirements outlined in this Environmental Management Plan.

Staff Member (Full Name)	Signature	Date

4 Activities and Controls

This Section identifies those activities considered relevant to site operations. The Company will be responsible for on-going maintenance and compliance.

4.1 Soil and Water Management

A Soil and Water Management Plan has been prepared by Barker Ryan Stewart (BRS). The report addresses surface stormwater, water requirements and supply, stormwater quality and impacts of flooding. BRS have recommended the application of the following strategies and methods, primarily in relation to the potential impacts of flooding.

- The facility will need to be checked by a licensed electrician to ensure that all electrical circuitry is positioned above the 1% AEP flood level plus freeboard.[2]
- The owner of the facility will need to ensure that any material stored on the site that is associated with the welding of the bins is also stored at or above this level.
- It is recommended that a flood evacuation report be undertaken should there not already be one for the facility to ensure all occupants are aware that the area is flood prone and under what circumstances evacuation will be required.

4.2 Air Quality

An assessment of potential air quality impacts upon surrounding properties has been prepared by Benbow Environmental (BE).

The NSW EPA guideline of the *"Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (August 2005)"* were followed in the preparation of the Air Quality Assessment Report.

Specifically, the assessment has identified air emission sources associated with the proposal; discussed the relevant legislation and guidelines applicable; and undertaken an assessment of impacts from identified air emission sources.

[2] The finished floor level (FFL) of the site is RL22.14m AHD. The design flood level is estimated at RL22.7m AHD. The required height for electrical circuitry is therefore RL23.2m AHD (flood level + 500mm freeboard) or 1.06metres above FFL.

Based upon the outcomes from the dispersion modelling the proposal is considered to be satisfactory with no additional air emission controls required. The proposed operation would not result in a significant impact towards the existing local air quality.

4.3 Traffic Generation

A review of the traffic and vehicle movements has been undertaken by Thompson Stanbury Associates (TSA). The report examines the implications of the proposed development assess the potential traffic generation, impacts of the estimated traffic generation on the existing road network, proposed truck access driveway location, compliance with the relevant Australian Standards, and compliance with relevant Council and RTA codes.

TSA concludes that off-street parking provided in the proposed development is considered to be sufficient for the day to day activities; the existing site and premises access arrangements and internal circulation proposed provide for safe and efficient vehicular and pedestrian movements during peak times; the surrounding road operates with a reasonable level of service during peak periods; and the surrounding road network is capable of accommodating the vehicular traffic generated by the proposal.

4.4 Noise

An assessment of potential noise impacts upon surrounding properties has been undertaken by Benbow Environmental (BE). The assessment considered the potential noise impacts associated with potentially affected receivers, and has been carried out in accordance with the NSW EPA Industrial Noise Policy (INP) and Road Noise Policy (RNP).

The findings of the noise assessment are considered to be satisfactory with a no specific management measures required. A recommendation of post commissioning validation measures is recommended.

4.5 Waste Transfer Facility Management Plan

4.5.1 Objectives of the Plan:

The objectives of the proposed waste transfer facility are:

- to provide a facility to aid in recovery of a variety of resources from the local community; and
- to provide a consolidation site for waste from multiple sources (including construction sites and residential, commercial uses) into waste specific transfer vehicles for more economical transport to disposal sites;
- to manage waste as a resource;
- to provide employment to St Marys and surrounding area;
- to ensure that potential impacts on the environment or the amenity of the locality from noise, dust or polluting emissions are minimised and properly managed;
- Implement the principles of ecologically sustainable development in the management and operation of the facility; and
- Provide for the management of a well-designed and modern facility.

4.5.2 Waste management control

Anfil Skip Bins Pty Ltd is a waste management transfer station that in effect receives waste directly from collection vehicles (skip bin trucks), then sorts and reloads the waste on to vehicles for delivery to a final disposal facility (either for recycling or disposal).

The following steps are undertaken during the waste transfer process:

1. Delivery of waste to the site in skip bins for sorting;
2. Screening of waste in to different sorting categories (by on site sorters);
3. Waste can be sorted on the floor however no waste is to be left on the floor at the end of the day. Any waste spilt, dropped or located on the floor is to be swept up and placed into the various skip bins at the close of the business day...
4. Identification of potential waste issues (including any evidence of asbestos containing materials);

5. Selecting of waste disposal option (allocation of materials to selected bins).

6. Transfer of waste off site for disposal.

4.5.3 Unexpected waste findings protocol

The site does not accept any hazardous waste, putrescible waste, green waste, liquid waste or asbestos containing materials waste for disposal, however the operation recognises that small quantities of unacceptable waste (such as asbestos containing waste) can inadvertently enter the waste stream through materials received on site for sorting.

In the event that unacceptable waste containing materials are detected the safe handling and storage practices are followed. For asbestos related waste, as regulated by the appropriate authority (EPA) under the Protection of the Environment Operations (Waste) Regulation 2005, a number of safety measures are followed. Site specific measures for small quantities of unacceptable waste include:

- wearing of protective safety clothing including overalls, mask and gloves;
- transfer to a designated area for safe temporary storage of unacceptable wastes until appropriate disposal is feasible;
- dampening of materials (in the case of asbestos) and secure packaging of asbestos material for transport off site;
- transfer to a designated collection storage container (portable bund - **Plate 1**) for any liquids (such as paint tins) for transport off site;
- transport in an appropriate vehicle (by an appropriately licensed contractor) to a landfill site that can lawfully receive the waste.

Portable Bund System 1200 x 1200
1200mm x 1200mm
Medium Duty UV Stable PVC material
Cat No: PBS1212PVC

PLATE 1 - Ecospill portable bund system (or similar)

4.5.4 Preventative measures

Preventative measures include appropriate training of staff, namely:

- Appropriate signage and identification;
- Employee training on identifying and managing suspect material;
- Training in adopted on site management measures;

4.5.5 Signage

Preventative measures include appropriate signage and identification that identifies the nature of the business, namely:

'Anyfil Skip Bins Pty Ltd does not accept hazardous waste, putrescible waste, green waste, liquid waste or asbestos containing materials under any circumstances.'

'Anyfil Skip Bins Pty Ltd does not accept waste direct from the public. Anyfil Skip Bins Pty Ltd retains the right to refuse any waste that is considered to contain unacceptable material.'

4.5.6 Site Controls

The nature of the waste stream and waste transfer station means that waste is received and sorted within a building, with no waste stored or sorted outside. The materials are confined primarily to dry waste such as construction waste, that does not require vehicle or bin washdown, and therefore limits the potential for stormwater runoff. As outlined above in the event that liquid waste is discovered in the waste it is relocated to a designated collection storage container for transport off site.

4.5.7 Emergency Management

Most days in waste transfer consist of routine procedures, however in the event of an emergency, a number of emergency management procedures have been adopted. Anticipation of emergencies and associated procedures include:

- Power failure - In the event of power failure, materials received are recorded manually;

- Unavailability of transfer vehicles – in the event of vehicle breakdown quantities of materials received on site will by varied accordingly, so that excess materials are not stored on site for extended periods;
- Fire – In the event of fire the first response is to call emergency services and evacuate the building. In accordance with fire safety regulations appropriate fire fighting equipment (extinguishers for dry powder, fuel and electricity) are kept on site for use in the event of fire. A fire hose reel has also been installed within the unit. In the event of emergency, fire water is contained within the bund area.
- Spill containment - The nature of the spill is identified, absorbent materials are deployed and clean-up procedures take place. The nature of materials received at the transfer station limits the nature of any spills to small quantities, and spill containment measures include a portable bund as outlined in Section 4.5.3.

NSW Workcover requires the business to contain a first aid box, signage, identification of emergency numbers, etc.

4.5.8 Record Keeping

Operating records are kept on site.

These include records of *incoming loads*: Date, time, driver, truck number, weight (loaded), weight (empty), origin of load and fee charged;

And *outgoing loads*: Date, time, driver, truck number, weight (loaded), destination.

5 Mitigation Measures

The section provides a list of the proposed monitoring and mitigation measures to be implemented.

5.1 Soil and Water Management, Air, Traffic and Noise

A summary of recommendations required by the specialist reports is provided below. A number of specialist reports have been prepared and our review of the various findings and conclusions provides the following summary of recommendations to be implemented within the management plan for the site.

Issue	Recommendation	Action
Flooding (Soil and Water Management Report)	The facility will need to be checked by a licensed electrician to ensure that all electrical circuitry is positioned above the 1% AEP flood level plus freeboard.	To be undertaken as part of any approval.
	The owner of the facility will need to ensure that any material stored on the site that is associated with the welding of the bins is also stored at or above this level.	To be undertaken as part of any approval.
	It is recommended that a flood evacuation report be undertaken should there not already be one for the facility to ensure all occupants are aware that the area is flood prone and under what circumstances evacuation will be required.	To be undertaken as part of any approval.
Noise	The undertaking of post-commissioning validation measurements is recommended.	To be undertaken as part of any approval.
Air Quality	No recommendations.	No Action.
Traffic	No recommendations.	No Action.

5.2

5.3 Fire Safety

The building contains a number of fire safety measures as required by Workcover and the Building Code of Australia. These include required fire exits, fire hose reels and fire extinguishers.

5.4 Traffic and Parking

- The vehicles used on site include two SRV's and one MRV.
- All staff parking is provided on site.
- All vehicles are to park in the designated parking spaces.

5.5 Waste Management

- Clearly delineate waste storage and handling areas.
- Provide specific receptors for collection of materials for green waste, paper and recycling and clearly label.
- Any hazardous wastes (including any rags or oil wastes from servicing of vehicles) are to be separated, stored and collected for disposal in accordance with relevant legislation.

5.6 Emergency/Incident Management Reporting

- Ensure that all operational staff have been trained in appropriate procedures including site induction, materials handling (including dangerous and/or hazardous goods) and emergency response procedures.
- Develop and implement emergency response procedures and appoint appropriate individuals as contact offers (wardens).
- Maintain a register of any hazardous materials stored on site.
- Ensure that appropriate safety response equipment is clearly labelled and available at all times.
- All employees and visitors are to register (in a log book) their entry and departure from the site.

- Maintain an 'open door policy' in respect of receiving and recording complaints or incidents from the community.
- Publish contact and after hours contact numbers.
- Establish and maintain a complaints register, incorporating date, time and nature of inquiry, name of complainant, follow-up investigations, and response taken.

6 Review of Document

6.1 EMP Review

The Company will review this MP every two years or in response to industry requirements or changes in industry practices.

6.2 Document Status Record

Amend the document status record whenever changes are made to the MP, including amendments made.

Date Amended	Amendment Made

7 References

- Guideline for the Preparation of Environmental Management Plans, published by the Department of Infrastructure Planning and Natural Resources (**DIPNR**) 2004.
- Site Layout Plan (Dwg. No. PGH-12-0414-DA01), dated 20/02/2013, prepared by PGH Environmental Planning.
- Internal Layout Plan (Dwg. No. PGH-12-0414-DA02), dated 1/06/2012, prepared by PGH Environmental Planning.
- Noise Impact Assessment (Report No.131013_Rep_Rev3) dated 17 April 2013, prepared by Benbow Environmental.
- Air Impact Assessment (Report No.131008_Rep_Final) dated July 2013, prepared by Benbow Environmental.
- Traffic Impact Statement, (Report No.12-108), dated April 2013, prepared by Thompson Stanbury Associates.
- Soil and Water Management Plan (Project No.20120250) dated October 2013, prepared by Barker Ryan Stewart.
- Waste Management Plan, dated 27 September 2013, prepared by PGH Environmental Planning.

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Appendix No. 1

STAFF TRAINING REGISTER

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Appendix No. 2

DEVELOPMENT CONSENT AND APPROVED PLANS