Operations Management Plan

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2.0	revised version to include Geelong	Pat Capaan	Pat Capaan	22/02/2021	Pat Capaan
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Introduction

Mainstream Recycling is a wholly owned subsidiary of TDG Environmental (TDG) and currently operates a portfolio of recycling facilities located on the Eastern seaboard of Australia. The Facilities accept and treat stormwater liquid waste and other stormwater related GPT solid wastes among other materials with some facilities also capable of managing low-contaminant materials. The treated material is transported for beneficial reuse and the treated water discharged to sewer.

The sites are operated in accordance with planning consents/approvals issued by the relevant local Council's and also in compliance with both New South Wales and Victorian Environment Protection Authority (EPA).

The various approvals define the upper limits of processing in tonnes per annum (tpa) of general solid waste (non-putrescible) and stormwater liquid waste. For specific information regarding the materials received at each facility refer to the local SWMS documents, however typical to each facility are the two waste streams:

- Liquid waste from stormwater management systems
- General solid waste (non-putrescible) consisting of grit, sediment, litter, and gross pollutants collected from stormwater devices and systems that has been dewatered so that it does not contain free liquids.

Mainstream Recycling are currently seeking various approvals to expand scope and scale of the facilities to process additional materials such as street sweeper waste for recycling and recovery, to support state recycling targets for municipal solid waste (MSW) as well as the overall landfill diversion target. As these applications are approved by EPA and consent is granted by Council then Mainstream will update this plan and the associated processes and procedures.

This Operations Management Plan (OMP) has been prepared to satisfy the requirements of Council and EPA, and in some cases the regulating Water Authority. The OMP details strategies and waste management mechanisms for the lawful recovery and waste accepted via the facilities during operation.

1.1 SCOPE

The OMP has been developed to ensure the desired operational outcomes from the facility. Operational planning is completed to deliver the operational objectives below and with reference to the Business Plan. There are numerous and complex linkages between the different parts of the system and regular review is completed to ensure the system works as a whole. This OMP includes strategies for operations management and outlines effective controls for managing the Facility during operation.

1.2 OPERATIONAL OBJECTIVES AND KPI'S

Table 1-1 outlines the objectives and KPI targets during operation of the Facility.

Objective	Target	Timeframe	Accountability
Safety (WHS)	Minimum 90% of total waste processed being recovered for beneficial reuse,	Duration of operations	General Manager Operations Manager SQE Manager
Compliance	No PIN's, infringements, or any other similar fines	Duration of operations	Operations Manager SQE Manager
Cost control	Delivery of Operational outcomes to/below budget	Duration of operations	Operations Manager General Manager

1.3 Summary of Operational Reporting

The monitoring activities to be implemented throughout operations to ensure that outbound product management objectives and safety target are achieved.

Table 1-2: Summary of Operational Reporting Requirements

Reporting Requirement	Frequency
Compliance (Daily Plant & Shift Check sheets)	Daily
Cost Control (Weekly P&L)	Weekly
Safety (interaction and observations)	Weekly
Safety (Incident & Injury reporting)	Per Incident

Measure and monitoring will be undertaken in accordance with the Measuring and Monitoring [PRO-TDC- 107] procedure.

1.4 System Inconsistencies

Importantly the system was developed using a "bottom up, top down" approach to ground-truth the processes and procedures at the bottom level before constructing the management system around these processes and procedures. Therefore, any inconsistencies in the system need to be traced from the processes and procedures in an upwards direction through the document hierarchy to determine appropriate corrections. Regular review and internal auditing (covered below) will support this process.

2 EXISTING FACILITY AND OPERATIONAL IMPACTS

2.1 EXISTING FACILITIES

This OMP identifies and covers three (3) facilities:

- New South Wales Wetherill Park - 6 Sleigh Place, Wetherill Park NSW
- Victoria Truganina - 104 Agar Drive, Truganina VIC
- Victoria Breakwater - 7-8 Haworth Ct, Breakwater VIC

2.2 New South Wales - Wetherill Park Facility

The Facility is located at 6 Sleigh Place, Wetherill Park NSW 2164, within the Wetherill Park Industrial Estate. The total site is around 3,100 square metres (m2)in size and comprises Lot 78 of DP 845746. The site is zoned IN1 General Industrial under the Fairfield Local Environmental Plan (LEP) 2013.

The Facility is located about 430 metres south of Prospect Reservoir and about 200 metres east of Cowpasture Road. Surrounding land uses are typical of a commercial / industrial area and include warehouses, distribution, production and supporting services. Key land uses within the broader area include land uses for primary production / agricultural purposes.

Access to the site is from Sleigh Place which connects to Cowpasture Road to the west which allows access to the broader arterial road network including, The Horsley Park Drive, Elizabeth Drive and the M7 motorway.

The site is relatively flat, having a slight slope from the rear of the site to the street boundary. The nearest residential area is located about 1,600 metres north of the site. The Facility comprises of the following elements:

- A building incorporating site offices and amenities.
- Car parking spaces for visitors (2) and staff (23)
- In-ground weighbridges with an electronic docketing system, at the entrance and exit to the operational area of the Facility.
- A contained waste tipping floor, with dust and odour control
- A fully bunded processing hall with filters, settling tanks and water treatment system, screening, and separation where the waste is dewatered, mixed, adjusted with sawdust, and processed. Roll over bunds are located at the entry and exit points.
- A floor slab designed to capture all free liquids.
- Containment areas to store and hold waste for treatment.
- Liquid treatment units designed to comply with Sydney Water sewer discharge standards, and to achieve a water quality potentially suitable for off-site recycling (e.g., landscape irrigation, truck wash or wash- down water)
- Liquid holding tanks to store treated liquid ready for transport and recycling / reuse.
- An activated carbon odour management system
- Discharge exhaust fans to produce negative ventilation.
- Dust suppression sprinkler system
- Fire protection infrastructure

The Facility layout is shown below.

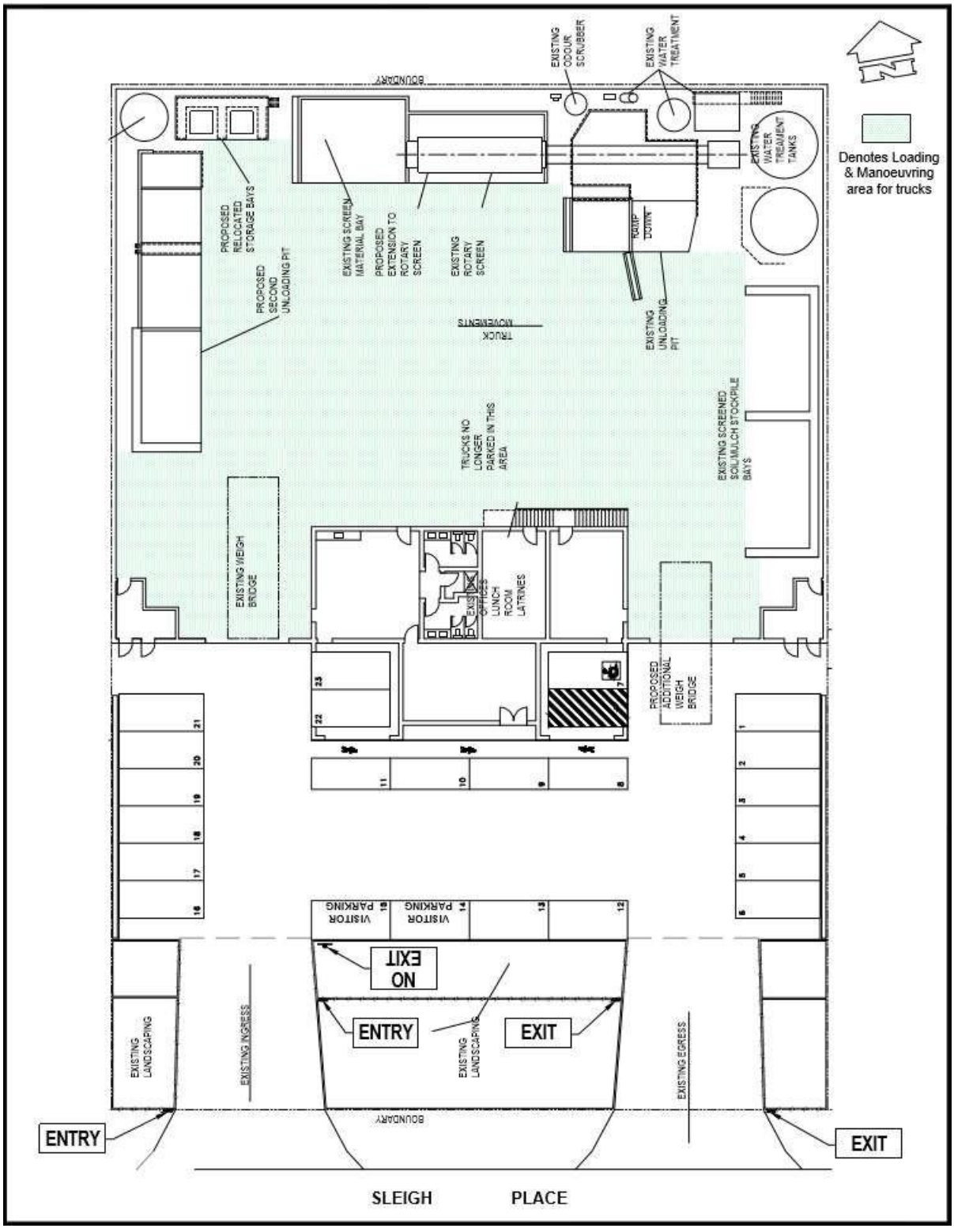


Figure 2-1: Overview of site layout

2.2.1 Processing Overview

Any liquid wastewater received at the Facility, is discharged into in-ground receival pits, where the surface liquids are pumped to holding tanks for treatment by a plate separator or Dissolved Air Flotation (DAF) plant. The processed water is then discharged to sewer, in accordance with the Sydney Water Trade Waste Agreement (TWA) 38666. When operating and as required, currently the discharge of treated air from the holding tanks to the atmosphere occurs through a vent stack in the building roof.

NOTE: The liquid portion of waste received at the premises is not permitted to be recycled or re-used for any purpose

All settled solids and other oversize residual material (including grit, sediment, plastics, PET bottles, silt, soil, leaves, and tree-bark and other organic matter) are collected from the bottom of the receival pits. All oversize waste not suitable for reuse will be removed from the Facility via tipper truck and will be disposed of at an appropriately licenced Facility. Any oversize waste material suitable for recycling, will be removed from site to an appropriately licence recycling facility.

A non-thermal process involving dewatering of remaining solids and separating / sizing through trommel screens is undertaken to recover mulch, leaves, soils, and fine organic material.

Some of the settled solids and other oversize residual material will be mixed with saw dust, if required, to allow processing.

Figure 2.2-2 shows a diagrammatical view of the Facility's inputs and outputs, and Figure 2.2-3 summarises the recovery process.

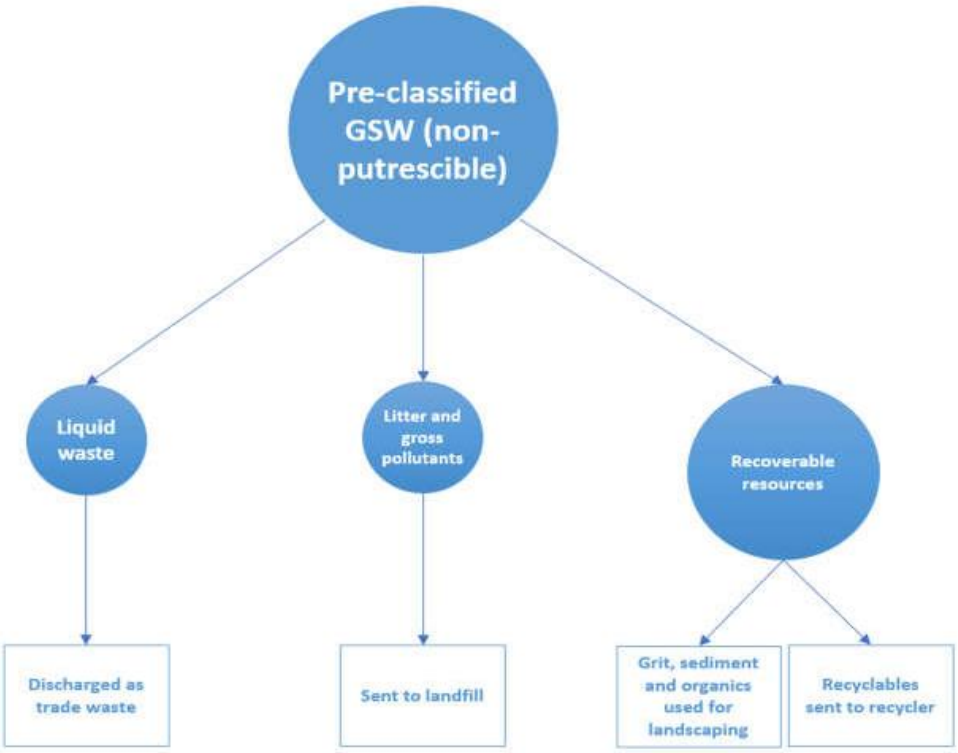


Figure 2.2: Current inputs and outputs

2.2.1.1 Resource recovery process

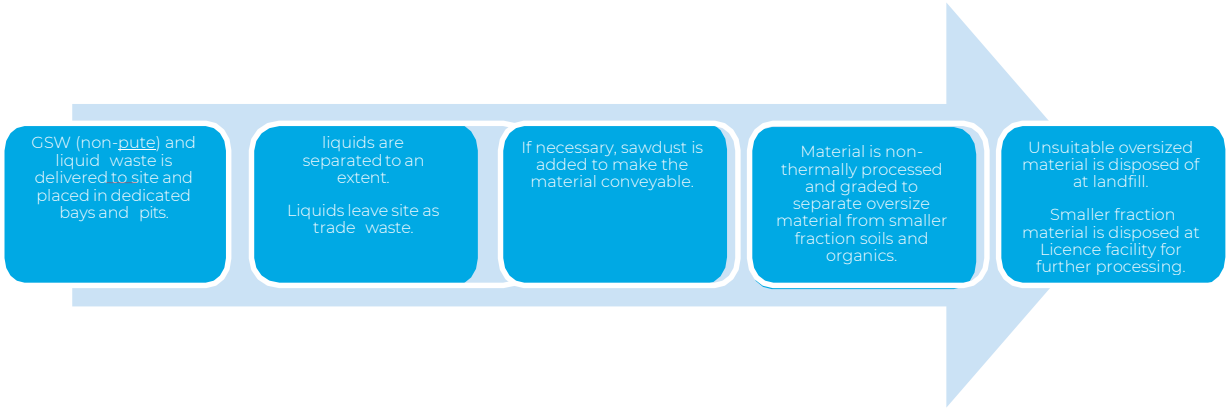


Figure 2.2-3: Summary of resource recovery process

If approved by NSW EPA, the Street sweeper waste would be unloaded into existing bays or pits and be treated, stored, managed, and reused through existing processes.

2.2.2 Operating Hours

The Facility is approved to receive and treat waste during the following times:

Monday to Friday from 7 am to 6 pm
Saturdays from 7 am to 1 pm
No processing is permitted on Sundays or public holidays.

2.2.3 Material Types and Acceptance

The Facility operates as a resource recovery facility where the following two waste streams are processed:

- Liquid waste from stormwater management systems
- General solid waste (non-putrescible) consisting of grit, sediment, litter, and gross pollutants collected from stormwater devices and systems that has been dewatered so that it does not contain free liquids.

The material accepted on site will be consistent with the materials classified as General Solid Waste (non- putrescible) as defined within the NSW EPA Waste Classification Guidelines (2014).

The treated material is transported to a licenced facility for further processing, with treated water discharged to sewer and a small quantum of residual non-recoverable waste being disposed to landfill.

2.2.3.1 Permitted waste.

Currently the following permitted waste is received at the Facility:

- Storm water from gross pollutant traps (GPT)
- Leaf and tree litter from GPTs
- Sediment from GPTs
- Plastic bottles from GPTs

- Aluminium and glass bottles from GPTs
- Grass clippings from GPTs
- Stormwater waste from stormwater pipe work.

NOTE: Waste collected in a GPT from a spill incident or pollution event must not be received at the Premises

2.2.3.2 Street sweeper waste

Currently Mainstream Recycling are seeking approval to process street sweeper waste. It is anticipated that the predominant method of transporting street sweeper waste to the Facility will be in bulk vehicles such as skip bin trucks, and truck and dogs. However, street sweeper vacuum trucks may also transport waste directly to the site in the future.

2.2.3.3 Waste not permitted.

As detailed in the EPL 20694, the following types of waste are not permitted to be received at the Premises:

- Street sweeping waste.
- Liquid waste (other than from stormwater gross pollutant traps as listed in L2.1).
- Hazardous waste
- Special waste1
- Restricted waste
- Medical waste.

2.2.4 Resource Recovery

Where materials are recovered for reuse under Resource Recovery Orders and Resource Recovery Exemptions, stringent quality control processes will be applied in accordance with the Development Consent and the EPA licence requirements. This will include analysis at the Facility's on-site laboratory and verification at a NATA-accredited facility.

Any non-conforming product will be managed in accordance with SWMS Batch Management procedure.

2.3 Victoria -Truganina Facility

The facility is situated on a very flat industrial area which is 440m from Doherty's drain and approx. 1.3km to the nearest sensitive receiver. The facility is completely enclosed in a shed and acts as a completely bunded site. Surrounding land uses are typical of a commercial / industrial area and include mainly large and small warehouses, distribution, production and supporting services. Key land uses within the broader area include land uses for agricultural purposes.

Access to the site is from Agar Drive which connects to Boundary Road to the South which allows access to the broader arterial road network including the M8 and M80 motorways.

The Facility comprises of the following elements:

- A building incorporating site offices and amenities.
- Car parking spaces for visitors (4) and staff (11)
- In-ground weighbridge with an electronic docketing system, at the entrance and exit to the operational area of the Facility.
- A contained waste tipping floor, with dust control and potential for odour control
- A fully bunded processing hall with settling tanks and water treatment system, screening, and separation where the waste is dewatered, mixed, adjusted with sawdust, and processed. Roll over bunds are located at the entry and exit points.
- A floor slab designed to capture all free liquids.
- Containment areas to store and hold waste for treatment.
- Liquid treatment units designed to comply with City West Water sewer discharge standards, and to achieve a water quality potentially suitable for off-site recycling (e.g., landscape irrigation, truck wash or wash-down water)
- Liquid holding tanks to store treated liquid ready for transport and recycling / reuse.
- Fire protection infrastructure

The Facility layout is shown below.

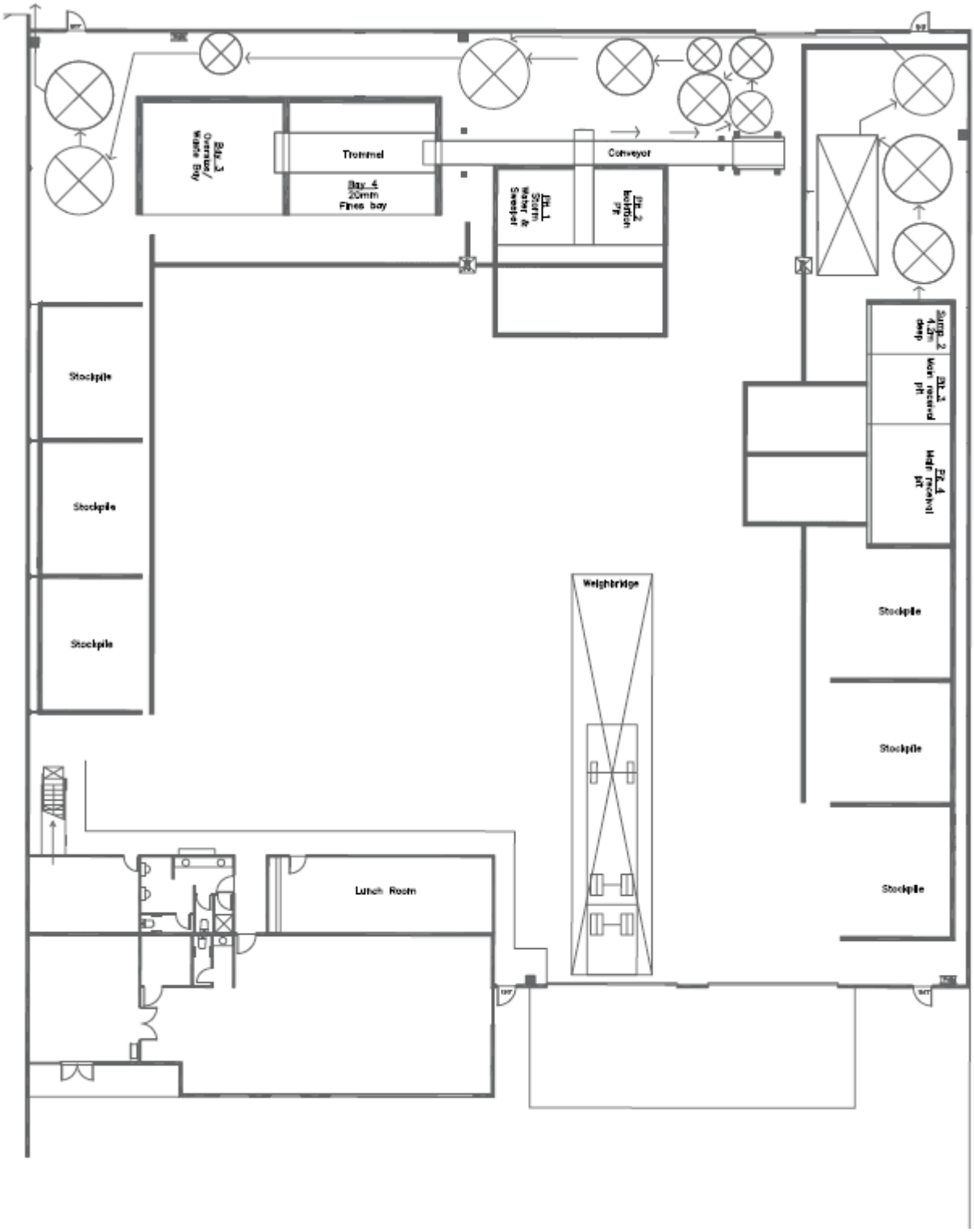


Figure 2.3-4: Overview of site layout

2.3.1 Processing Overview

Any liquid wastewater received at the Facility, is discharged into in-ground receival pits, where the surface liquids are pumped to holding tanks for treatment by a sedimentary separation process. The processed water is then discharged to sewer, in accordance with the City West Water Trade Waste Agreement.

The recovered material from this process is mixed with virgin sawdust to allow create a spadable product.

Figure 2.2 shows a diagrammatical view of the Facility's inputs and outputs, and Figure 2.2-3 summarises the recovery process.

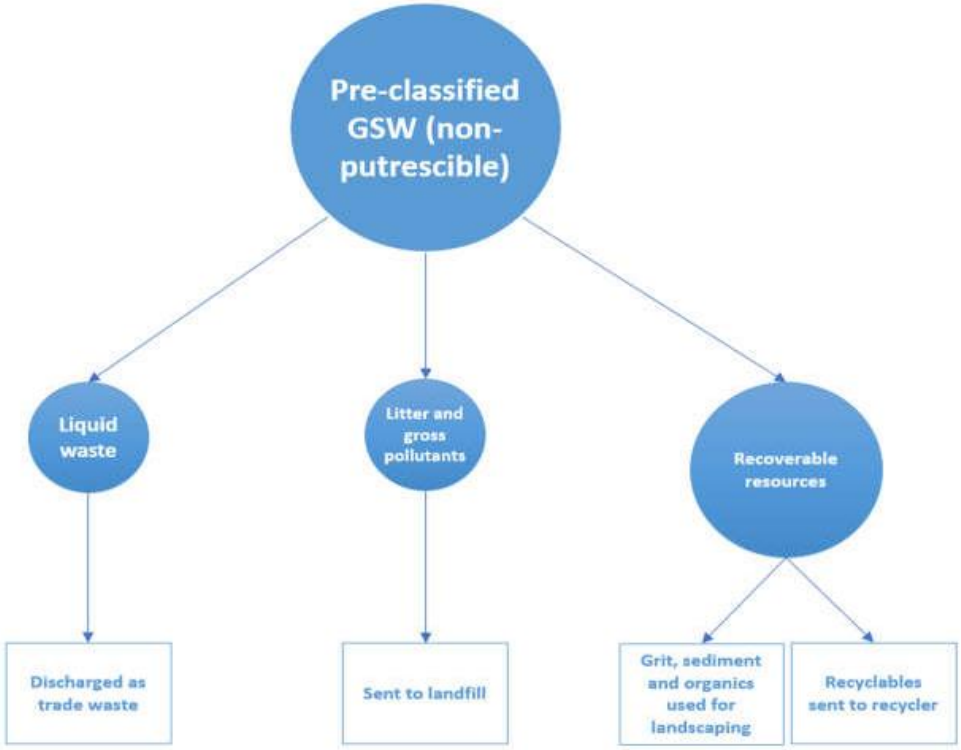


Figure 2.3-2: Current inputs and outputs

2.3.1.1 Resource recovery process

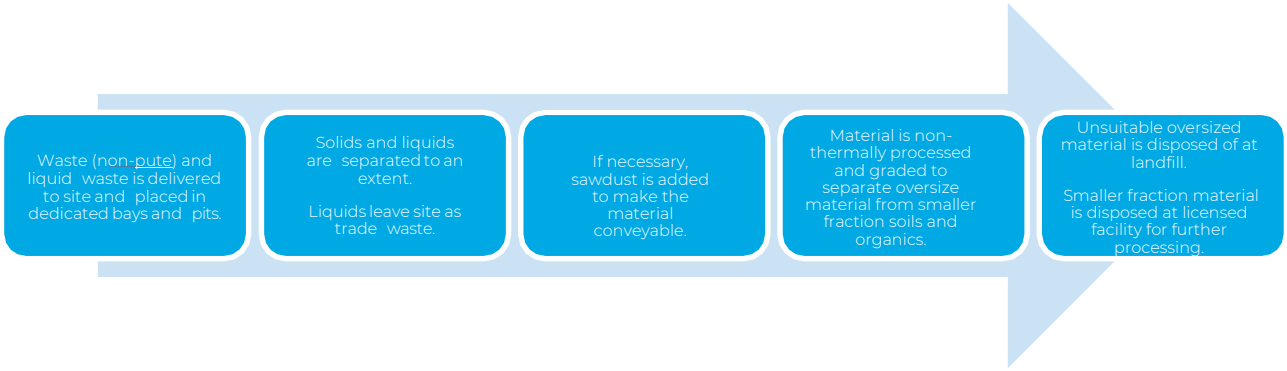


Figure 2.5-3: Summary of resource recovery process

2.3.2 Operating Hours

The Facility is approved to receive and treat waste during the following times:

Monday to Friday 24hrs
Saturdays and Sundays 24hrs
Processing is permitted on Sundays or public holidays.

2.3.3 Material Types and Acceptance

The Facility operates as a resource recovery facility where the following waste streams are processed:

- Liquid waste from stormwater management systems
- General solid waste (non-putrescible) consisting of grit, sediment, litter, and gross pollutants collected from stormwater devices and systems that has been dewatered so that it does not contain free liquids.
- Category C materials including N120 Cat C Soils and T130 Cat C NDD (hydro excavated muds)
- K310 Sawdust
- K300 Clean Soils
- Clean sands
- Clean mixed materials from Councils such as broken footpath/dirt/grass
- Street Sweepings

Unless material meets the classification for N120 and/or T130-H, the material accepted on site will be consistent with the materials classified as Clean Fill, N122 or T130-NH as defined within the VIC EPA Document 1828.2 Waste Disposal Categories - Characteristics & Thresholds.

The treated material is transported to a permissioned facility for further processing, with treated water discharged to sewer and a small quantum of residual non-recoverable waste being disposed to landfill.

2.3.3.1 Permitted waste.

Currently the following permitted waste is received at the Facility:

- Liquid waste from stormwater management systems
- General solid waste (non-putrescible) consisting of grit, sediment, litter, and gross pollutants collected from stormwater devices and systems that has been dewatered so that it does not contain free liquids.
- Category C materials including N120 Cat C Soils and T130 Cat C NDD (hydro excavated muds)
- K310 Sawdust
- K300 Clean Soils
- Clean sands
- Clean mixed materials from Councils such as broken footpath/dirt/grass
- Street Sweepings

Unless material meets the classification for N120 and/or T130-H, the material accepted on site will be consistent with the materials classified as Clean Fill, N122 or T130-NH as defined within the VIC EPA Document 1828.2 Waste Disposal Categories - Characteristics & Thresholds.

The treated material is transported to a permissioned facility for further processing, with treated water discharged to sewer and a small quantum of residual non-recoverable waste being disposed to landfill.

2.3.3.2 Permitted waste.

Currently the following permitted waste is received at the Facility:

- Liquid waste from stormwater management systems
- Pre-Classified (non-putrescible) consisting of grit, sediment, litter, and gross pollutants collected from stormwater devices and systems that has been dewatered so that it does not contain free liquids.
- Category C materials including N120 Cat C Soils and T130 Cat C NDD (hydro excavated muds)
- Sawdust
- Clean Soils
- Clean sands
- Clean mixed materials from Councils such as broken footpath/dirt/grass
- Street Sweepings

NOTE: Waste collected in a GPT from a spill incident or pollution event must not be received at the Premises

These waste types are permissible under the EP Regulations 2021 schedule 5 and associated Regulations. The anticipated breakdown of waste streams received is provided in Table 2-1.

Table 2-1: Melbourne Waste streams

Material	Volume (TPA)	Percentage
Mix/blend of above materials	40,000	100%
TOTAL	40,000	100%

2.3.3.3 Waste not permitted.

As detailed in the EPA Licence, the following types of waste are not permitted to be received at the Premises:

- Liquid wastes above pH 12.5 and below pH 4.0
- Category B and Category A Hazardous wastes

2.3.4 Resource Recovery

Where materials are recovered for reuse stringent quality control processes will be applied in accordance with the Development Consent and the EPA licence requirements. This will include analysis at the Facility's on-site laboratory and verification at a NATA-accredited facility.

Any non-conforming product will be managed in accordance with the Corrective actions register.

2.4 Victoria - Breakwater Facility

The Facility is located at 7-8 Haworth Ct, Breakwater VIC 3219, within a small Industrial Estate. The total site is around 7,000 square metres (m2) in size and comprises Lot 3 LP204948. The site is zoned IN1Z Industrial under the Geelong Planning Scheme 2021.

The Facility is located about 1km North of the Barwon River and about 160 metres West of Boundary Road. Surrounding land uses are typical of a commercial / industrial area and include warehouses, distribution, production and supporting services. Key land uses within the broader area include land uses for residential and primary production / agricultural purposes.

Access to the site is from Haworth Ct which connects to Boundary Road to the East which allows access to the broader arterial road network including, Fellmongers Rd, and The Princes Hwy.

The site is relatively flat, designed with a slight slope to the centre of the facility. The nearest residential area is located about 170 metres East of the site. The Facility comprises of the following elements:

- A building incorporating site offices and amenities.
- Car parking spaces for visitors (4) and staff (23)
- Certified weighbridge to manage incoming and outgoing material volumes.
- A contained waste tipping floor
- A hardstand processing area with mechanical equipment, settling tanks and water treatment system, screening, and separation where the waste is dewatered, mixed, and processed.
- Concrete areas are designed to capture surface runoff from the processing/handling of wastes.
- Material storage bays with drainage and runoff capture
- Planned containment areas to store and hold waste for treatment.
- Fire protection infrastructure

The Facility layout is shown below.

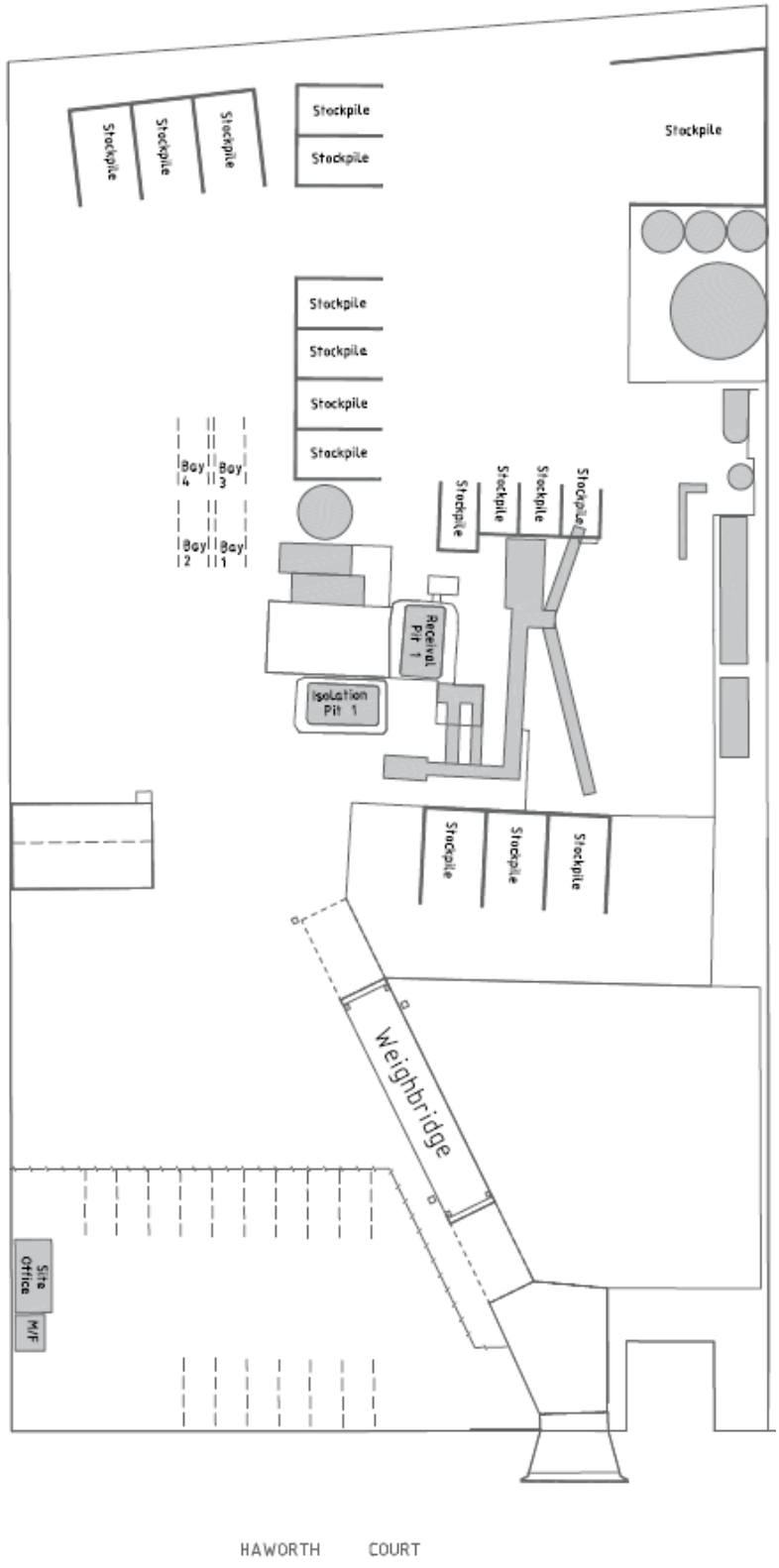


Figure 2-6: Overview of site layout

2.4.1 Processing Overview

Any liquid wastewater received at the Facility, is discharged into in-ground receival pits, where the material is treated by a dewatering and grading / sizing process using log wash and sizing. The recovered water is then processed by a centrifuge and discharged to sewer, in accordance with the Trade Waste Agreement (TWA).

NOTE: The liquid portion of waste received at the premises is permitted to be recycled or re-used onsite.

All settled solids and other oversize residual material (including grit, sediment, plastics, PET bottles, silt, soil, leaves, and tree-bark and other organic matter) are collected from the bottom of the receival pits. All oversize waste not suitable for reuse will be removed from the Facility via tipper truck and will be disposed of at an appropriately licenced Facility. Any oversize waste material suitable for recycling, will be removed from site to an appropriately licence recycling facility.

A non-thermal process involving dewatering of remaining solids via an Archimedes screw followed by separating / sizing through a hydro grade is undertaken to recover sand, aggregates, and soil fines. The recovered material is suitable for beneficial reuse in landscaping and/or construction activities.

Figure 2.4.7 shows a diagrammatical view of the Facility's inputs and outputs, and Figure 2.4.8 summarises the recovery process.

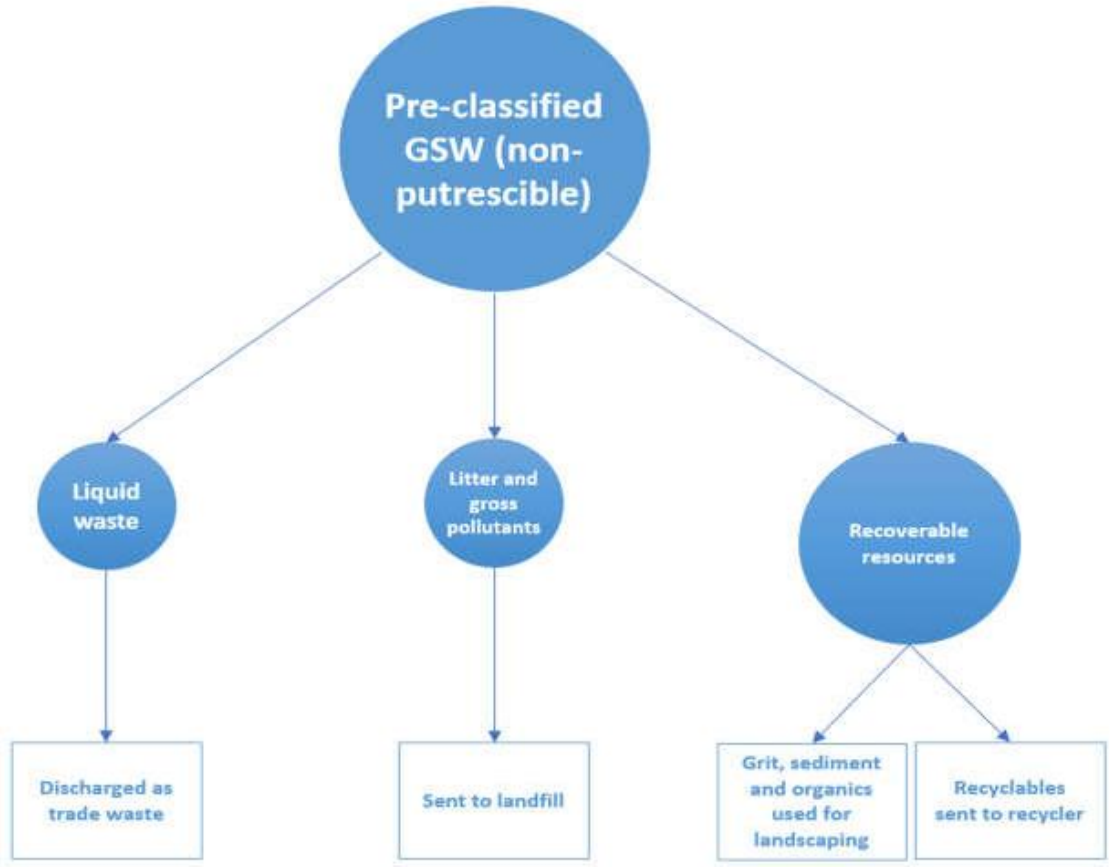


Figure 2.4-7: Current inputs and outputs

2.4.1.1 Resource recovery process

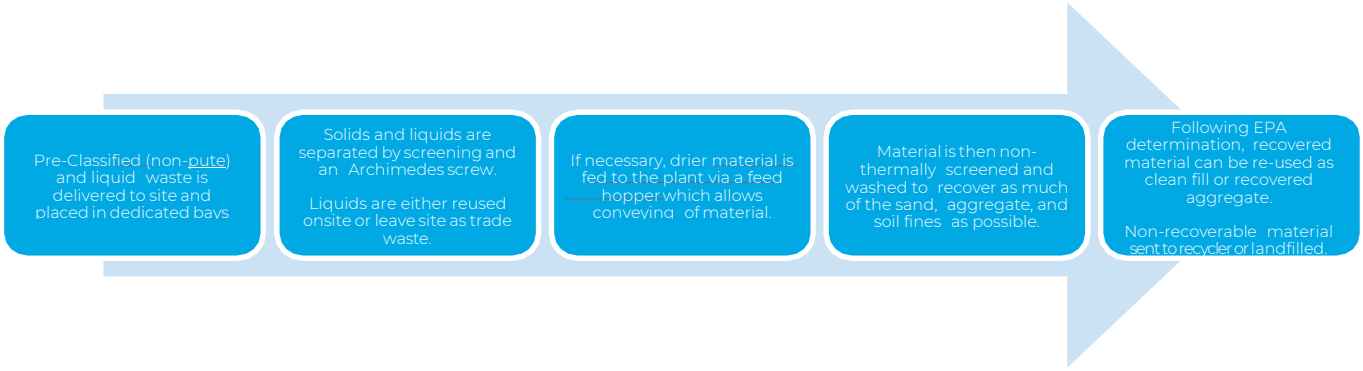


Figure 2.4-8: Summary of resource recovery process

2.4.2 Operating Hours

The Facility seeks approval to receive and treat waste during the following times:

Monday to Friday 24hrs
Saturdays and Sundays 24hrs
Processing is permitted on Sundays or public holidays.

2.4.3 Material Types and Acceptance

The Facility operates as a resource recovery facility where the following waste streams are processed:

- Liquid waste from stormwater management systems and liquids from NDD process.
- General solid waste (non-putrescible) consisting of grit, sediment, litter, and gross pollutants collected from stormwater devices and systems that has been dewatered so that it does not contain free liquids.
- Clean Soils
- Clean sands
- Clean mixed materials from Councils such as broken footpath/dirt/grass
- Street Sweepings

The material accepted on site will be consistent with the materials classified as Clean Fill, N122 or T130-NH as defined within the VIC EPA Document 1828.2 Waste Disposal Categories - Characteristics & Thresholds.

Following EPA determinations, the treated material is transported for beneficial reuse, with treated water discharged to sewer and a small quantum of residual non-recoverable waste being disposed to landfill.

2.4.3.1 Permitted waste.

Currently the following permitted waste is received at the Facility:

- Liquid waste from stormwater management systems
- Pre-Classified waste (non-putrescible) consisting of grit, sediment, litter, and gross pollutants collected from stormwater devices and systems that has been dewatered so that it does not contain free liquids.

- Clean Soils
- Clean sands
- Clean mixed materials from Councils such as broken footpath/dirt/grass
- Street Sweepings

NOTE: Waste collected in a GPT from a spill incident or pollution event must not be received at the Premises

These waste types are permissible under the EP Regulations 2021 schedule 5 and associated Regulations. The anticipated breakdown of waste streams received is provided in Table 2-3.

Table 2-3: Breakwater Waste steams

Material	Volume (TPA)	Percentage
Mix/blend of above materials	60,000	100%
TOTAL	60,000	100%

2.4.3.2 Waste not permitted.

As detailed in the EPA Permit application, the following types of waste are not permitted to be received at the Premises:

Liquid wastes above pH 12.5 and below pH 4.0

Category A, B & C Hazardous wastes

2.4.4 Resource Recovery

Where materials are recovered for reuse under EPA determination or permission, stringent quality control processes will be applied in accordance with the Development Consent and the EPA licence requirements. This will include analysis at a NATA-accredited facility.

Any non-conforming product will be managed in accordance with the Corrective Actions register.

3 KEY OPERATIONAL RISKS

The overarching Mainstream Recycling EMP, details the identified risks associated with their Facilities (See Section 4 of the EMP) and also details the required controls to minimise the identified risks.

The potential impacts associated with the management of waste for the Facility include, but are not limited to the following:

Safety – work at heights, traffic, electricity, stored energy, fatigue, mental health

Environmental – waste, air quality and odour, noise, pollution

Commercial – contracts, costs, suppliers, internal & external customers

Regulatory – non-compliance

3.1 Safety/WHS

Safety systems, processes and procedures are generated at Group level under the PLA-TDG-007 Health Safety Management Plan (Group HSMP). A copy of this plan is available as requested from the National SQE Manager or any other appropriate person in the Group. All aspects of safety in Mainstream Recycling's Operation are to be planned, executed, monitored, adjusted, documented, and recorded in accordance with the Group WHS Plan which is accredited as an ISO 45001 system.

3.1.1 Consultation

Consultation with employees at all levels in the organisation is required and encouraged. The National Operations Manager will ensure that toolbox talks, as a minimum, are held regularly to provide a method of engaging with Mainstream employees in a meaningful and constructive manner. These consultations are conducted, documented, and recorded using the processes and procedures outlined under the Group WHS Plan.

Where necessary the National Operations Manager or any other Mainstream employee can request the presence of or access to senior Group personnel as required to affect a safe working environment.

3.1.2 Responsibilities

All Mainstream employees are expected to take responsibility for safety in the workplace. It is noted that different employees at various levels in the organisation can have varying degree of influence over safety outcomes and appropriate consultation.

3.1.3 Risk Management

Risk management including the process of identifying and assessing hazards, and implementing appropriate controls will be conducted, documented, and recorded using the processes and procedures outlined under the Group WHS Plan. It is important to align with Group protocols to deliver Group-wide safety outcomes that can be measured.

3.1.4 Risk Register

Appendix A attaches the risk register which is considered a live document and requires regular update. The risk register is to be completed in consultation (refer above) with employees at various levels within Mainstream Recycling and supported/guided by the SQE personnel. Key Safety Documents

SWMS are the key safety document for Mainstream Recycling. These documents are constructed with direct input from operational employees and reflect, as best as possible, the job steps required to complete certain tasks.

3.1.5 Auditing & Review

All internal and external audits will be conducted, documented, and recorded.

3.2 Compliance (Approvals, Licenses, & Permits)

3.2.1 Legal and Other Requirements

New South Wales - Wetherill Park

- Development Consent (DA803.1/2014) approved on 27 July 2015 and as Modified on 28 February 2020 (DA 803.4/2014) issued under Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act)
- Protection of the Environment Operations Act 1997 (POEO Act) (EPL 20694) issued under POEO Act
- Protection of the Environment Operations (Waste) Regulation 2014
- Waste Avoidance and Resource Recovery Act 2001 (WARR Act)
- Additional legislation, standards and guidelines relating to the management of waste include:
- Waste Classification Guidelines – Part 1: Classifying Waste, EPA, 2014
- NSW EPA Guidelines on Resource Recovery Orders and Resource Recovery Exemptions
- Protection of the Environment Operations (Waste) Regulations 2014 (Clause 93)

Victoria - Truganina

- Air Quality Management (Vic EPA 2001, SEEPP AQM)
- Acoustic impact –
    - Melton City Council Condition No.5 and No.8a(PA2018/6235/1)
    - VIC EPA Policy (Control of Noise from Commerce, Ind. & Trade) No. N-1 ('SEPP N-1')
    - Australian standard AS/NZS 2107-2016: Acoustics –Recommended design sound levels and reverberation times for building interiors.

Victoria - Breakwater (Current Application in progress)

- Application APP006705 submitted 30 September 2021.
- Modification to existing activity to include T130-NH, K300, N122, L200-NH, K310-NH, W_3 (various)

3.2.2 EPA and Act Approval

New South Wales - Wetherill Park

- The Facility currently operates under approval DA 803.1/2014 (as Modified). Details of the approvals history at the Facility are provided in Table 3-1.

Victoria - Truganina

- Development Consent (PA2018/6235/1) approved on 19 September 2018 by Melton City Council.

- Vic EPA Section 30A approval granted 19/05/2022 (approval no. 224281, 233504 & 248868)

- Operating Licence OL000300006 Granted 6 August 2021 (A01 - Reportable Priority Waste Management)
- Exemption EXM000300047 granted 28 February 2022 (non-scheduled activity)

Victoria - Breakwater

- Application APP006705 submitted 4 October 2021.
- Modification to existing activity to include T130-NH, K300, N122, L200-NH, K310-NH, W_3 (various)

Table 3-1: Existing approvals at the Wetherill Park Recycling Facility

Approval	Details	Approved
DA 803.1/2014	The approval allowed for the fit out and use of an existing factory building for the purposes of a waste recycling facility for the removal of waste materials from gross pollutant traps. The approval allows for: Delivery and processing of up to 20,000 tonnes per annum of waste. Up to seven trucks per day Up to four trucks parked on site at any one time	27July 2015
Modification 1 (DA 803.4/2014)	Modification 1 increased the handling capacity of recycled stormwater cleaning waste from 20,000 tpa to 29,500 tpa. This modification also allows for: Use of up to two articulated vehicles per week for the servicing and/or operations of the Facility. Up to 15 trucks servicing the site per day for the purpose of delivering waste from gross pollutant traps. No trucks to be parked on the site at any time.	28 February 2020
Modification 2	Modification 2 seeks to process up to 4,000 tpa of council street sweepings, which will be accommodated within the existing, approved limit of 29,500 tpa.	Submitted, in progress

3.2.3 Environment Protection Licenses Compliance Requirements

An NSW EPA Environment Protection Licence (EPL20694) associated with the Wetherill Park Facility was issued by NSW EPA to Mainstream Recycling Pty Limited on 12 February 2021. A copy of the licence is available if required.

A VIC EPA Operating Licence (OL000300006) associated with the Truganina Facility was issued by VIC EPA to Mainstream Recycling Pty Limited on 6 August 2021. A copy of the licence is available if required.

A permission submission for a 13b Permit associated with the Breakwater Facility was submitted on 30 September 2021.

An example of EPA requirements is demonstrated below for the Wetherill Park facility, however, please refer to the local sites for up-to-date details and copies of EPA licences held.

3.3 Waste Management

Wastes are delivered to the Facilities via vacuum tankers, combination vacuum tankers, tipper trucks, and skip bin trucks (vehicles).

The vehicle access to the facility is via entry and exit driveways. All vehicles enter the one-way system site cross over the incoming weighbridge and into the material processing area / building. All material entering the facility is weighed in and weighed out.

All unloading and loading of waste material occurs inside the designated area / building. Once material is unloaded or loaded, the vehicles exit over the weighbridge and out of the site. All material leaving the facility is weighed in and weighed out.

3.3.1 Waste Sources

Waste material is generally received from individual clients that are:

- Removing silt and debris from wastewater and stormwater networks (facilities and conduits).
- Removing material during NDD processes
- Street sweepings (VIC only)

Waste Management Processes & Waste Management Handling

Mainstream Recycling receives a significant portion of material from companies within TDG. TDG Environmental is the main source of incoming material delivered in combination jet/vacuum trucks. As such, with relevance to waste management, some of the waste management procedures and waste handling processes are completed onsite by these entities, and in this respect they are treated as a "customer" when engaging with Mainstream Recycling.

The processes specifically managed by Mainstream Recycling commence at the facilities themselves and apply equally to internal and external customers. Mainstream Recycling makes internal and external customers aware of our waste management procedures and waste handling processes through long- standing relationships and working closely with each Operator as they arrive at the facility.

3.3.2 Odour management

New South Wales - Under Section 129 of the Protection of the Environment Operations Act (NSW)1997

Victoria - Under Victorian EPA (Air Quality Management) 2001 (SEPP AQM)

3.3.3 Traffic management

Traffic management at the sites will be managed primarily by the Tipping SOP (for each site) which nominates how vehicle Operators are to make their presence known to alleviate potential congestion. It also describes how Operators will access Mainstream facilities to minimise potential for traffic congestion.

More broadly, Mainstream Recycling has designed and developed material handling methods to provide optimal turnaround times for Operators and their vehicles. Where it is possible, Mainstream will upgrade facilities to improve turnaround times if and when technology and advancement allows.

3.3.4 Operational Contingency Measures

Operations at the Facilities have the potential to be disrupted by various internal and external factors. Some disruptions may be planned, such as scheduled maintenance work, while other disruptions may occur without notice.

The OMP defines responsibilities and actions required in the event of an operational disruption. The National Operations Manager will either be in control of, or be informed of, any such event and provide further direction in accordance with the plan. The National Operations Manager will monitor the delivery of operations at the site to ensure that disruptions at the Facility are minimised.

4 PEOPLE, ROLES AND RESPONSIBILITIES

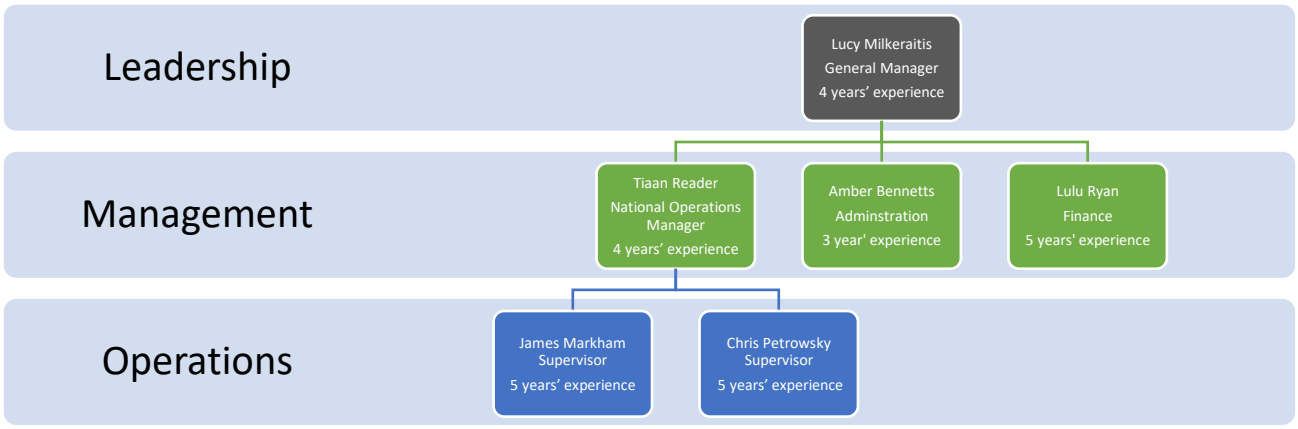
A summary of relevant roles and responsibilities associated with this OMP are outlined in Table 4-1. HR is primarily planned and managed at Group level and guidance to Mainstream is provided via overarching documents such as PLA-TDC-408 Workplace Inclusion & Diversity Plan for all Mainstream Facilities. Employment contracts and position descriptions which underpin the various roles and responsibilities are in place and managed at Group level.

Table 4-1: Roles and responsibilities

Responsibility	Actions	Timing
National Operations Manager	Delivery of Operational goals, KPI's and Safety. Including implementation of the Operations Management Plan, involvement with new facilities construction and/or acquisition.	Ongoing
Chemist	Management of records, review of licence conditions, supervising sampling and testing requirements, operational input and duties as required	Ongoing
Supervisor	Safety in the facility, manage the facility and material handling, customer service and engagement, plan production runs, ensure daily checks on compliance and P&E are completed satisfactorily, plant maintenance	Ongoing
National SQE Manager	Review of any complaints received or incidents, and reports from audits/monitoring conducted. Liaising with regulators and stakeholders, as required. Safety, Quality, and Environmental compliance	Ongoing
National Training Manager	Environmental Training and communication	Ongoing
General Manager	All of the Below, plus assist with the implementation of systems, procedures, and engagement strategies during the project and delivery works	Project and delivery works

4.1 Structure, Skills, and Experience

Managing the combination of skills and experience in the Operation is critical to the successful implementation of the OMP. Mainstream's Facilities are either focussed on waste and recycling or have strong elements of waste and recycling that impact the business. Below is the Organisation structure for Mainstream Recycling.



4.2 Training and Awareness

A Training Matrix has been developed in accordance with TDG's Induction, Training and Competency procedure [PRO-TDC-117] to determine the mandatory training requirements to be undertaken, including licence, certificates or competence and awareness for the Client project.

All staff working at the facilities will undergo the following training before starting work and will acknowledge receipt of the training by signing relevant documentation:

- Site induction
- Emergency response training
- Familiarisation with site environmental features requiring protection and controls – environmental awareness.
- Induction into the requirements of the EMP and the WMP
- Specific operational and environmental training of relevant employees (where required)

All training records will be managed in accordance with Induction, Training and Competency procedure [PRO-TDC-117] and Document Information procedure [PRO-TDC-116] and lodged in JMS (bespoke business management system).

Toolbox training may also be used to facilitate change management and to promote environmental awareness.

5 REVIEW

5.1 Operational Site Inspections

The National Operations Manager and/or delegate will undertake regular inspections on the work site to monitor the performance of operational controls implemented on site. Any actions resulting from the inspections will be promptly verified, recorded, and resolved.

5.2 Audit

Internal & external audits will be undertaken to confirm the effectiveness of operational controls.

Internal audit will be undertaken in accordance with Internal Audit Procedure [PRO-TDC-105] and in accordance with the Internal Audit schedule [FOR-TDG-050].

External audits will be undertaken by independent consultants or certifying organisations.

5.3 Complaints

Complaints may be received directly from the community or relevant regulatory authorities. Complaints handling will be undertaken in accordance with Communications and Complaints Register.

5.4 Review and Improvement

Review and improvement of this OMP will be undertaken in accordance Management Review Procedure (PRO-TDG-022).

Continuous improvement will be achieved by the ongoing evaluation of environmental management performance and effectiveness of this plan against environmental policies, objectives, and targets.

6 RELEVANT DOCUMENTATION

The following are the key operating procedures and checklists relevant to the Mainstream Operation:

Document name
Pollution Incident Response Management Plan (PIRMP) [PLA-TDG-MR-012]
Waste Management Plan (WMP) [PLA-TDG-MR-011]
Work Health Safety Management Plan (WHS) [PLA-TDG-007]
Environmental Management Plan (EMP) [PLA-TDG-008]
Quality Management Plan (QMP) [PLA-TDG-009]
Workplace Inclusion & Diversity Plan [PLA-TDG-004]
SOP-TDG-004-01 Waste Tipping into Pits – Wetherill Park
SOP-TDG-002-01 Waste Tipping into Pits - Breakwater
SOP-TDG-003-01 Waste Tipping into Pits - Truganina
Control of Non-Conforming Product, Corrective and Preventive Action [PRO-TDC-102]
Emergency Preparedness and Response [PRO-TDG-019]
Internal Audit Procedure [PRO-TDC-105]
Measuring and Monitoring [PRO-TDC-107]
Document and Record Control [PRO-TDC-116]
induction, Training and Competency procedure [PRO-TDC-117]
Internal Audit schedule [FOR-TDG-050].
Environment Policy [POL-TDG-003]
Fatigue Management Policy [POL-TDG-009]
Quality Policy [POL-TDG-002]
Work Health and Safety Policy [POL-TDG-001]

APPENDIX A – RISK REGISTER