Waste Management Plan

Wetherill Park

Document Identification: PLA-TDG-MR-036-02
Location: 6 Sleigh place, Wetherill Park, New South Wales

Revision control

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1 Introduction

Mainstream Recycling is a wholly owned subsidiary of Total Drain Group Pty Ltd (TDS) and currently operates a recycling facility (the Facility) is located at 6 Sleigh Place Wetherill Park. The Facility accepts and treats stormwater liquid waste and other stormwater related GPT solid wastes. The treated material is transported for beneficial reuse and the treated water discharged to sewer.

The site is operated in accordance with the planning consent issued by Fairfield City Council in 2015 (DA803.1/2014) as Modified in February 2020 (DA 803.4/2014) and in compliance with NSW Environment Protection Authority (EPA) Licence No. 20694.

The Approval allows the Facility to process up to 29,500 tonnes per annum (tpa) of general solid waste (non-putrescible) and stormwater liquid waste. The two waste streams processed at the Facility comprise:

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.

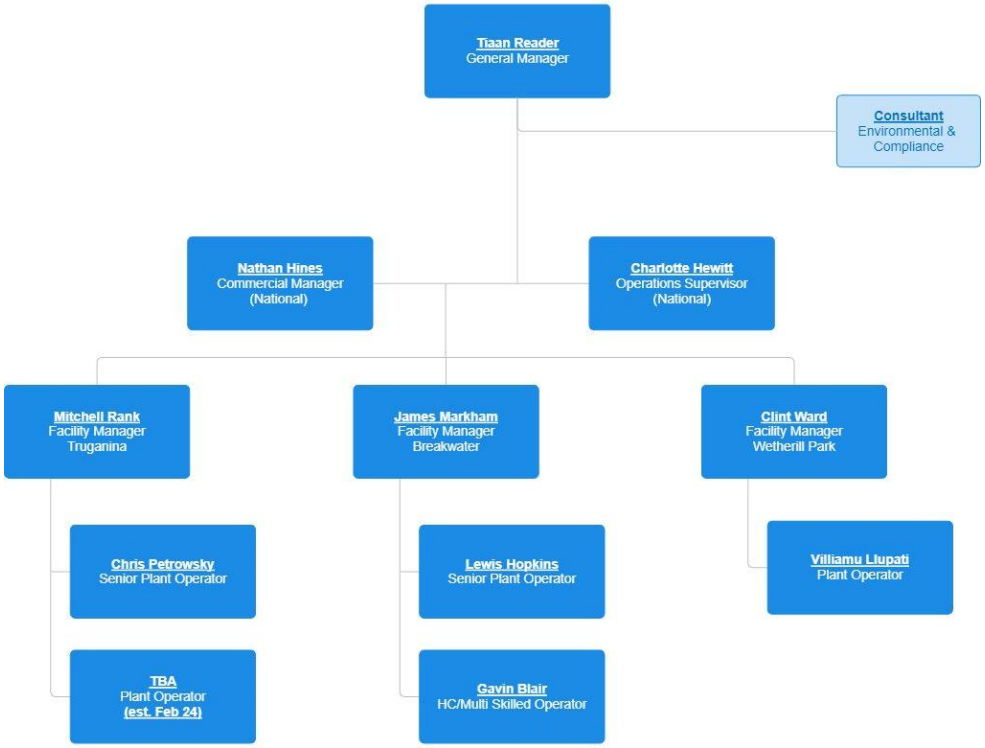
This Waste Management Plan (WMP) has been prepared to satisfy the requirements of the Development Consent (the DA803.1/2014) as modified, and EPL 20622. The WMP details strategies and waste management mechanisms for the lawful recovery and waste accepted via the Facility during operation.

1.1 Purpose

MAINSTREAM RECYCLING PTY LIMITED holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for facility located at 6 Sleigh place, Wetherill Park, New South Wales.

The WMP has been developed to support the site's current version of the *Environmental Management Plan (EMP)* ***[PLA-TDG- 008-01]*** and the TDG Integrated Management System. This WMP includes management strategies for waste management and outlines effective controls for managing waste during Facility operation.

1.2 Mainstream Recycling Organisational Structure



1.3 Environment Protection Licence (EPL) details

Name of licensee: (including ABN)	MAINSTREAM RECYCLING PTY LIMITED ABN 75 611 996 493
EPL number:	20694
Premises name and address:	6 Sleigh place, Wetherill Park, New South Wales 2168
Company or business contact details	Name: Tiaan Reader Position or title: National Operations Manager Business hours contact number/s: 0433 684 447. After hours contact number/s: 1300 330 294. Email: info@mainstreamrecycling.com.au
Website address:	www.mainstreamrecycling.com.au
Scheduled activity/activities on EPL:	Waste processing (non-thermal treatment) Waste storage
Fee-based activity/activities on EPL:	Non-thermal treatment of liquid waste Waste storage - other types of waste

1.4 Objects and Targets

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

Table 1 1: Objectives and Targets

Objective	Target	Timeframe	Accountability
Achieve resource recovery target	A minimum 90% of total waste processed being recovered through process	Duration of operations	Facility Manager General Manager Operations Supervisor
Environmental incidents and non-compliances action close-out rate	>95% of actions closed out within agreed timeframes	Duration of operations	SHEQ Manager Facility Manager
Compliance with all legal requirements	No regulatory infringements (PINs or prosecutions).	Duration of operations	SHEQ Manager General Manager Facility Supervisor

2 EXISTING ENVIRONMENT AND OPERATIONAL IMPACTS

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 (m^2)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

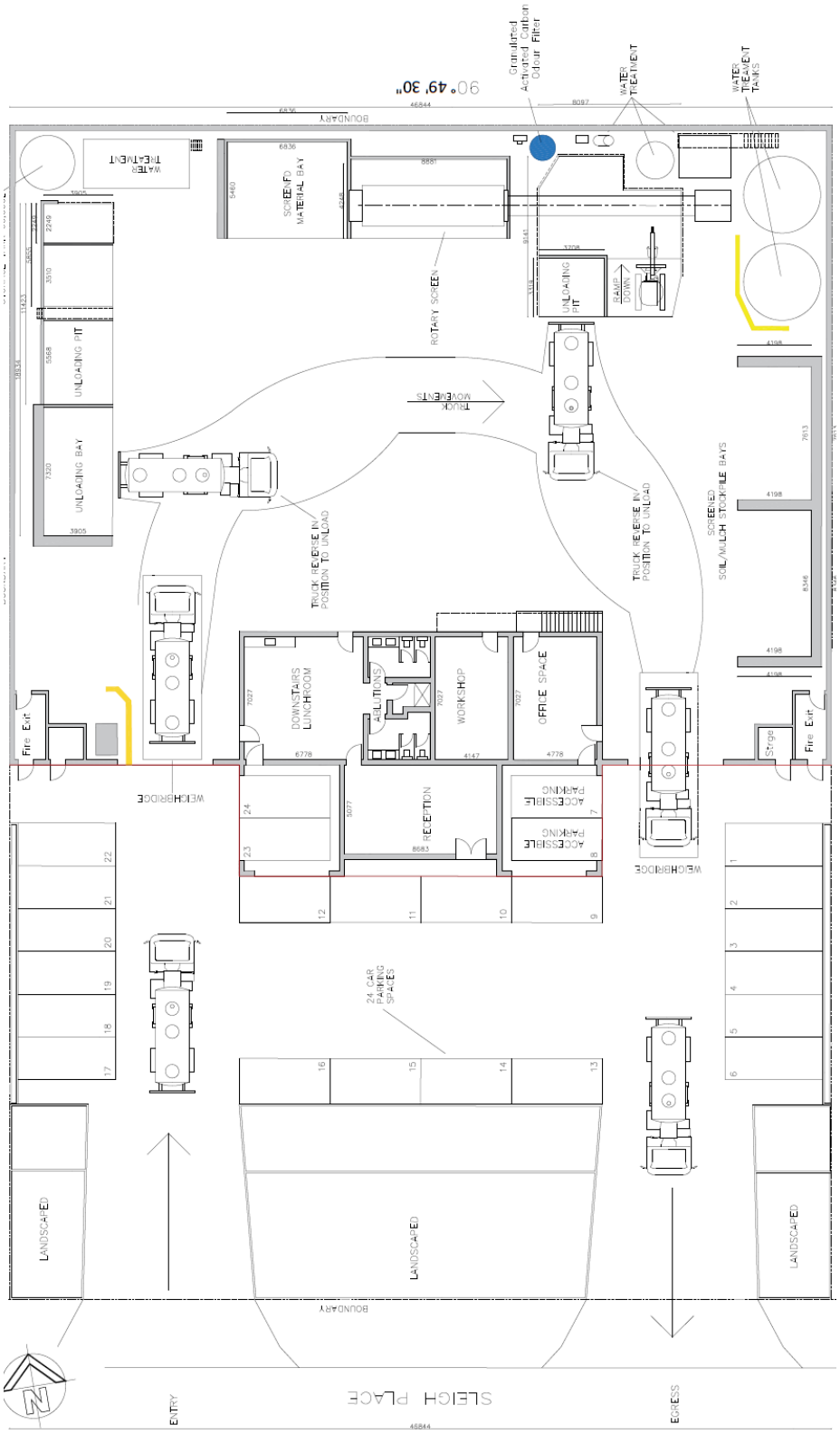
The site is relatively flat, having a slight slope from the rear of the site to the street boundary. The nearest residential area is located about 1,600 metres north of the site.

2.1 Facility Overview

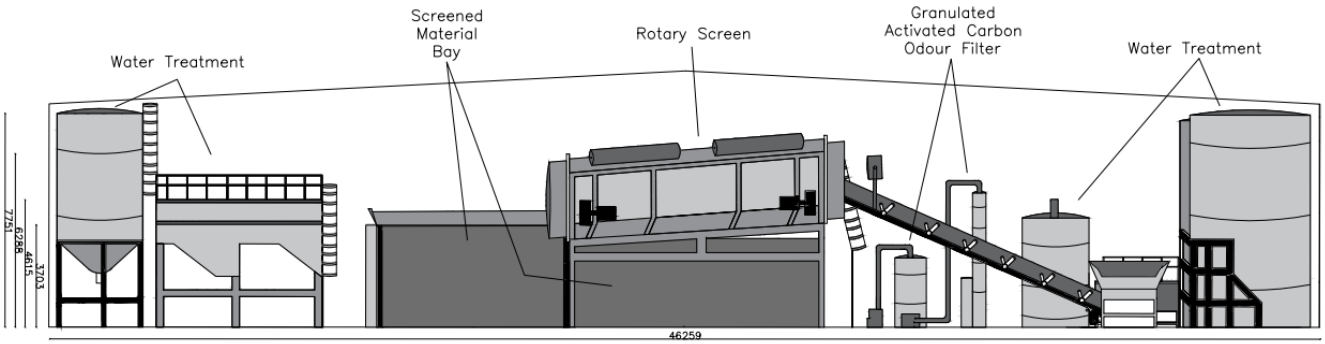
The Facility comprises of the following elements:

- 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 on **Error! Reference source not found.**1



The Facility Elevations is shown on Error! Reference source not found.2



2.2 Operations Details

Waste Delivery

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

The vehicle access to the facility is via separate entry and exit driveways (i.e. one way in and one way out). All vehicles enter the one-way system site from Sleigh Place, cross over the incoming weighbridge and into the material processing building. All material entering the facility is weighed in and weighed out.

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

Waste Sources

Stormwater quality improvement devices (SQID), a component of stormwater management systems, provide primary treatment of stormwater at the source, trapping the large gross pollutants, heavier grits and organics. SQIDS trap materials from being transported further afield and therefore need to be cleaned regularly to ensure they continue to function as intended to protect our oceans and harbours from gross (large) pollutants and excessive organic material. SQIDs are typically cleaned with a combination vacuum loading truck (combo) as a preferred means of sucking out captured gross pollutants, grit and sediment fines.

Waste material is generally received from individual clients that are removing silt and debris from wastewater and stormwater networks (facilities and conduits).

Waste 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.

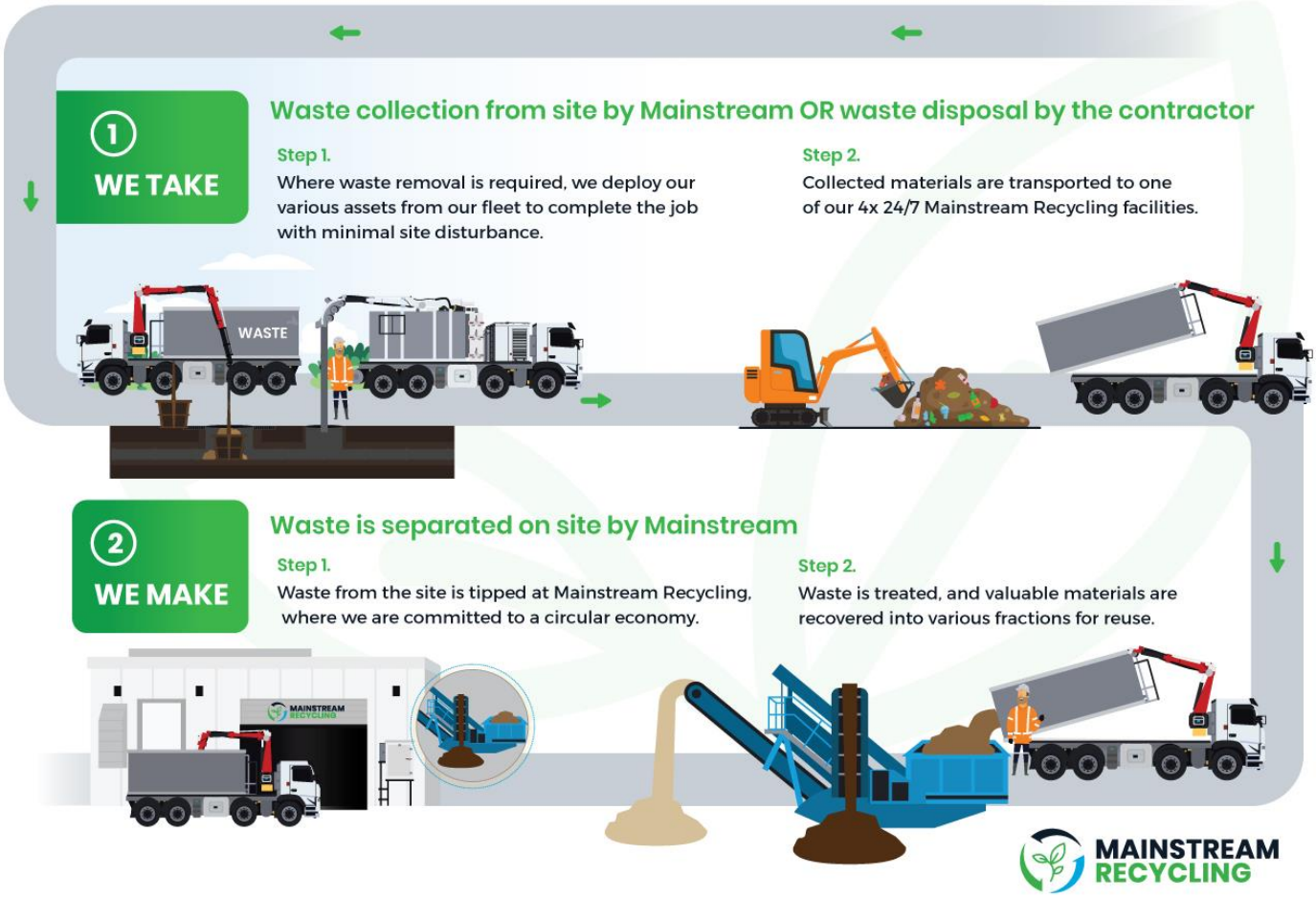
NOTE: The liquid portion of waste received at the premises is not permitted to be recycled or re-used for any purpose.

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. The recovered organic mulch, leaves, soils and fine material is suitable for beneficial reuse in landscaping activities.

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

Error! Reference source not found. shows a diagrammatical view of the Facility's inputs and outputs and summarises the recovery process.



Waste Management Processes & Waste Management Handling

Mainstream Recycling receives a significant portion of material from internal companies of the TDG group. TDG is the primary source of incoming GPT and stormwater material which is typically delivered in combination 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 and training is delivered via an online Training and Resource portal; site staff work closely with each Operator as they arrive at the facility.

Nature of Process/ Procedure	Waste Management Processes &/or Waste Handling Process	Process &/or Procedure	Document/ Record	Identified Risk	Control Measure
EXTERNAL TO MAINSTREAM	Source selection: • Incoming GPT material	Only work with Council derived material	Assignor scheduling system Weighbridge Transaction	Potential for contaminants from industrial areas and demolition sites	>95% volume received is from internal business units. New Customers are inspected prior to bidding at tender stage
	Pre-start/onsite ITP: • GPT inspection & cleaning	GPT Training & GPT Cleaning Methodology	Operator Training manual & GPT specification Weighbridge Transaction	Material does not comply with licence conditions	Unsuitable material sent to licensed facility (Reschedule or divert load)

Nature of Process/ Procedure	Waste Management Processes &/or Waste Handling Process	Process &/or Procedure	Document/ Record	Identified Risk	Control Measure
INTERNAL TO MAINSTREAM	Receival of unprocessed material: • GPT material	Truck discharge SOP Waste disposal SOP	Log of random sampling and/or random testing Weighbridge Transaction	Material does not comply with licence conditions	Visual & olfactory inspection Random sample retention/test results
	Storage of unprocessed material: • GPT material	Truck discharge SOP Waste disposal SOP	Weighbridge Transaction	Non-compliance with EPA approved site storage volume	EPA approved site storage not defined, however, if defined request will be to allow maximum storage of site 1250t
	Processing of material: • GPT material	Waste disposal SOP	Batch number, date, volume, Bay/pit Weighbridge Transaction	Heavy metals, oil/hydrocarbons, foreign objects, sewer	Sampling and testing of recovered material
	Storage of processed material: • GPT material	Waste disposal SOP	Batch number, date, volume, Bay/pit Weighbridge Transaction	Non-compliance with EPA approved site storage volume	EPA approved site storage not defined, however, if defined request will be to allow maximum storage of site 1250t

Nature of Process/ Procedure	Waste Management Processes &/or Waste Handling Process	Process &/or Procedure	Document/ Record	Identified Risk	Control Measure
INTERNAL TO MAINSTREAM	Release of material: • Processed GPT material	Waste disposal SOP	Batch number, date, volume, test results	Environmental pollution/site contamination	Analyte schedule & thresholds referencing current EPA Resource Recovery Orders & Exemptions, Material Release Process
	○ Recovered material from processing		Batch number, date, volume, test results		Failed batches of recovered material sent to landfill and/or an appropriately licensed facility
	○ Oversize material from processing		Batch number, date, volume, [NOT TESTED]		Oversize material sent to landfill and/or an appropriately licensed facility
	○ Liquid portion from processing		Batch number, date, volume, test results		Liquid portion sent to trade waste

2.3 Operating Hours

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

Days of Operation	Hours of Operations
Monday - Friday	7:00am – 6:00pm
Saturday	7:00am – 1:00pm
Sunday	NA
Public Holidays	NA

2.4 Predicted Waste Impacts

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:

- Waste (including sediment and fines) leaving the site and entering the local stormwater system
- Oversize waste not suitable for reuse not disposed of at an appropriately licenced Facility
- Air quality issues associated with the release of noxious gases when removing waste from wastewater
- Odours
- Potential noise impacts from the processing infrastructure and vehicle movements
- Traffic impacts associated with the movement of vehicles in and out of the Facility
- Visual impacts associated with nuisance mud and dirt being tracked onto Sleigh Place

2.5 Odour

The updated odour assessment prepared for Modification 1 identified that the Facility complies with the relevant odour criteria.

Under Section 129 of the Protection of the Environment Operations Act 1997, the licensee must not cause or permit the emission of any offensive odour from the premises

3 Environmental Management Framework

3.1 Legal and Other Requirements

The following regulatory framework applies to this WMMP:

- 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 under *Protection of the Environment Operations (Waste) Regulations 2014* (Clause 93)

3.2 EP&A Act Approval

The Facility currently operates under approval DA 803.1/2014 (as Modified). Details of the approvals history at the Facility are provided in Table 0-1.

Table 0-1: Existing approvals at the Wetherill Park Recycling Facility

<table>
<tr><th>Relevant Conditions</th><th>Requirement</th><th>Document reference</th></tr>
<tr><td>L2</td><td>Waste</td><td></td></tr>
<tr><td>L2.1</td><td>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.
This condition does not limit any other conditions in this licence.
<table>
<tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr>
<tr><td>NA</td><td>Liquid Waste</td><td>Liquid waste from stormwater gross pollutant traps only</td><td>Waste processing (non-thermal treatment)
Waste storage</td><td></td></tr>
<tr><td>NA</td><td>Grit, sediment, litter and gross pollutants collected in, and removed from, stormwater treatment devices or stormwater management systems, that has been dewatered so that it does not contain free liquids</td><td>As defined in Schedule 1 of the POEO Act, in force from time to time</td><td>Waste storage
Waste processing (non-thermal treatment)</td><td></td></tr>
</table>
</td><td>Section 4.1</td></tr>
</table>

Relevant Conditions	Requirement	Document reference
L2.2	The following types of waste are not permitted to be received at the Premises: • liquid waste (other than from stormwater gross pollutant traps as listed in L2.1); • hazardous waste; • special waste; • restricted waste; or • medical waste.	Section 4.1.2
L2.3	Waste collected in a gross pollutant trap from a spill incident or pollution event must not be received at the Premises	Section 4.1.1
L2.4	The liquid portion of waste received at the premises is not permitted to be recycled or re-used for any purpose.	Section 0
L4	Hours of Operation	
L4.1	Activities on the premises, are permitted between 0600h and 1800h Monday to Friday, 0600h and 1300h Saturday, and at no time on Sundays and Public Holidays	Section **Error! Reference source not found.**
L5	Potentially offensive odour	
	No condition of this licence identifies a potentially offensive odour for the purpose of Section 129 of the *Protection of the Environment Operations Act 1997*. Note: Section 129 of the *Protection of the Environment Operations Act 1997*, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with conditions of licence directed at minimising odour.	Section **Error! Reference source not found.**
O1	Activities must be carried out in a competent manner	
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Section **Error! Reference source not found.**
O5	Waste Management	
O5.1	Any waste for processing, storage or resource recovery at the premises must be assessed and classified in accordance with the EPA Waste Classification Guidelines as in force from time to time.	Section 4.1 Appendix A

Relevant Conditions	Requirement	Document reference
O5.2	Each type of waste stored on site for recovery/recycling must be stockpiled separately.	**Error! Reference source not found.**
O5.3	All waste receival, processing and storage must be undertaken inside the building.	Section 0 **Error! Reference source not found.**
O5.4	All above ground tanks containing waste material must be bunded or have an alternative spill containment system in place.	Section 0 **Error! Reference source not found.**
O5.5	The licensee must ensure that suitable measures (e.g. high/low alarms, control valves with interlock control, one-way valves) are installed on all tanks, ponds or clarifiers and associated pipes and hoses to prevent the spillage of waste.	In Situ
O5.6	Any spillages on the premises must be cleaned up immediately. Waste/material must not be tracked outside of the waste treatment building.	EMP [PLA-TDC-400G]
O5.7	Sampling (for testing at a NATA accredited laboratory) of outgoing waste must be undertaken prior to waste leaving the Premises. Waste must not leave the Premises unless test results are confirmed to comply with receival facility requirements.	Section 4.2

3.3 Roles and Responsibilities

A summary of relevant roles and responsibilities associated with this WMP are outlined in Error! Reference source not found.. Section 2.2 of the EMP details the overarching Roles and Responsibilities for all Mainstream Facilities.

Table 0-2: Roles and responsibilities

Responsibility	Actions	Timing
General Manager Operations Supervisor Facility Supervisor HSEQ Manager	Overall implementation of the WMP	Ongoing
Operations Supervisor	Management of records	Ongoing
Operations Superviror	Meeting reporting and contract requirements	Ongoing
HSEQ Manager National Training Manger General Manager	Environmental Training and communication Review of any complaints received or incidents and reports from audits/monitoring conducted Liaising with regulators and stakeholders, as required	Ongoing

Responsibility	Actions	Timing
Bus.Dev.Manager General Manager	Assist with the implementation of systems, procedures, and engagement strategies during the project and delivery works	Project and delivery works

3.4 Training and Awareness

A Training Matrix has been developed to determine the mandatory training requirements (PRO-TDG-MR-049-01) for the client project and Mainstream's recovery centres, including licences, certificates, or competence and awareness. The overarching EMP provides more details.
An online Training and Resource portal supports this function and is accessible via QR codes or web address located at trafficked ingress points.

The site contains Permits, Policies and Procedures, Emergency and SDS information, as well various contact information.

Mainstream Recycling Training Resources

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

- Site induction
- Waste Tipping SOP
- Lone Worker SOP
- 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 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]*.

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

4 Waste Management and record keeping

4.1 Waste 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 waste 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 definition of General Solid Waste (non-putrescible) is defined in Error! Reference source not found..

The treated material is transported for beneficial reuse (as a high-quality landscaping product), with treated water discharged to sewer and a small quantum of residual non-recoverable waste being disposed to landfill.

4.1.1 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.

These waste types are permissible under the POEO Act and associated Regulations, as approved by the EPL. The anticipated breakdown of waste streams received is provided in Table 0-3.

- *Table 0-3: Waste steams*

Material	Volume (TPA)	Percentage
GPT waste	29,500	100%
TOTAL	29,500	100%

4.1.2 Waste not permitted

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

- Liquid waste (other than from stormwater gross pollutant traps as listed in L2.1);
- Hazardous waste
- Special waste[1]
- Restricted waste
- Medical waste.
- Sweeping waste

4.2 Resource Recovery and Sampling

Where materials are recovered for reuse under specific 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.

During operations batch sampling is undertaken by collecting 10 composite samples from every 400 tonnes (or part thereof) of the waste processed, and each sample is tested against approved criteria.

All samples will be tested by laboratories accredited by the National Association of Testing Authorities (NATA), or equivalent.

The test results for each composite sample will be validated as compliant before the product is supplied to a landscape partner. No recovered materials will be supplied as product if the concentration or other value of that attribute of any sample collected and tested, exceeds the relevant values listed in the relevant Resource Recovery Order.

Any non-conforming product will be managed lawfully and in accordance with the *Control of Non-Conforming Product, Corrective and Preventive Action [PRO-TDC-102].*

4.3 Waste Recording

The weighbridge is the primary location on site for recording the receiving and removing of waste. Typically, the weighbridge reporting information will include the following:

- Date
- Vehicle Registration
- Customer
- Waste type (liquids, GPT waste etc)
- Gross and Tare Weight
- Date and Time

[1] Waste Classification Guidelines Part 1: Classifying waste, NSW EPA, November 2014

- Weighbridge Management System Docket Number.

4.3.1 Summary of Monitoring Activities

Table 0-4 outlines the monitoring activities to be implemented throughout operations to ensure that inbound waste monitoring and outbound product management objectives and requirements are achieved.

Table 0-4: Summary of Monitoring Requirements

ID	Monitoring Requirement	Frequency
WM1	Waste received annually	Monthly (Daily if nearing limit)
WM2	Vehicle movements	Daily
WM3	Waste classification	As required
WM4	Waste sampling	Random sampling, and as required per “Batch”

4.3.2 Environmental Site Inspections

The Operations Manager will undertake regular inspections on the work site to monitor the performance of environmental controls implemented on site. Any actions resulting from the inspections will be promptly resolved.

4.4 Operational Contingency Measures

Operations at the Facility 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.

An Operational Contingency Plan will be implemented in the event of an operational disruption. The Facility Operations Manager will be informed of any such event and provide further direction in accordance with the plan. The Operations Manager will monitor the volumes of waste being accepted at the site to ensure that maximum waste processing rates at the Facility are not exceeded.

5 Review

5.1 Audit

Environmental audits will be undertaken in accordance with the Section 10 of the overarching EMP. This will include both internal audits and external audits.

Internal audit will be undertaken in accordance with *Internal Audit Procedure [PRO-TDC-105]* and in accordance with the *Internal Audit schedule [FOR-TDC-246]*.

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

5.2 Environmental Reporting

5.2.1 Annual Return

Annual returns are required to be submitting annually on the anniversary date of the EPL. Where performance reporting is required, all relevant information will be recorded and maintained at the Facility site.

5.2.2 Sampling records

Where required, the following records must be kept in respect of any samples required to be collected for the purposes of the EPL licence:

a) the date(s) on which the sample was taken
b) the time(s) at which the sample was collected
c) the point at which the sample was taken
d) the name of the person who collected the sample.

5.2.3 Summary of Reporting Requirements

Reporting requirements specific to this WMP is summarised in Table 0-5 below.

Table 0-5 Waste Reporting Schedule

Report	Scope	Schedule / triggers	Authority	Timeframe	Document control procedures
Internal Monthly Waste Reporting	Internal	Weekly	EPA	Weekly	Operations Supervisor
EPL Annual Return	EPL 20694 conditions	Annual	EPA	Annual (Licence anniversary date)	General Manager
Sampling Results	EPL 20694 Condition M1.3	As required	EPA	As required	External Nata Acc. Lab.

5.3 Incidents

In the event of a safety / environmental incident or unpredicted impacts relating to waste and resource recovery operations, it is the responsibility of all personnel to report the incident or event to the Operations Manager.

All incidents will be managed and reported in a systematic and structured manner, providing you with a clear process to follow and ensuring your confidence in the system, according to Section 8 of the overarching EMP.

5.4 Complaints

Complaints may be received directly from the community or relevant regulatory authorities. Complaints handling will be undertaken in accordance with Section 7.2 of the overarching EMP.

5.5 Review and Improvement

Review and improvement of this WMP will be undertaken in accordance with the Section 9.3 of the overarching EMP.

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