Operational Environmental Management Plan

halgan pty ltd

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Revision History

Ver #	Comments	Author	Reviewed	Date
0.1	Draft for assessment only	Andrew Wild	Glenn Horne	20.10.2020

Approval

Name	Role	Date

This Framework EMP has been prepared to respond to Fairfield City Council requests, and will be subject to finalisation, review and approval prior to commissioning and operation. Consultation with Council, WorkSafe NSW, NSW EPA, NSW Health and NSW Fire & Rescue would be incorporated into the final Plan as appropriate. This Management Plan will operate in general accordance with ISO-14000 Series OEMP, and be subject to external third-party review and audit.

The following to be incorporated into this Plan prior to finalisation:

- *NSW EPA Licence and DA conditions;*
- *NSW EPA Resource Recovery Order sampling and analysis requirements;*
- *Plant & Equipment operating and maintenance guidelines eg pumps, odour scrubber, DAF;*
- *As-built plans;*
- *Emergency evacuation plans.*

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1. Introduction

1.1 INTRODUCTION

This document details the operational and environmental management processes and measures to be implemented by Halgan to manage waste processing operations and related activities at 10 Davis Road, Wetherill Park NSW 2164.

This Operational Environmental Management Plan (OEMP) addresses the environmental requirements for Halgan Pty Ltd, and sets out processes and procedures used to facilitate effective and safe environmental practices, prevent off-site impacts and risk to the environment.

This OEMP has been developed in general accordance with the NSW Government (2009) *Environmental Management System Guidelines* and AS/NZS ISO 14001: 2015 *Environmental Management Systems*.

2. SCOPE OF OPERATIONS

2.1 Organisation and context

Halgan is responsible for the collection, treatment and recycling of liquid grease trap waste from the Recycling Facility at 10 Davis Road Wetherill Park NSW (refer **Figure 2.1**).

This OEMP addresses the environmental requirements of the entire organisation, including liquid treatment, operations and the day-to-day running of the administrative office.

Key issues which may affect Halgan's management of their environmental responsibilities include:

- Environmental conditions relating to climate change, waste management, contamination and biodiversity that may be affected by the Halgan's operations;
- Legal, regulatory, financial, technological, economic and competitive circumstances; and
- The organisation's processes, systems, processes or staff.

This OEMP is applicable to all staff employed and contracted to Halgan. All subcontractors to Halgan will be required to use this OEMP and will be inducted into the OEMP and all applicable environmental documentation and procedures.

Halgan's staff and subcontractors are required to comply with the legal and other requirements, including contract requirements, compliance obligations and applicable guidelines.

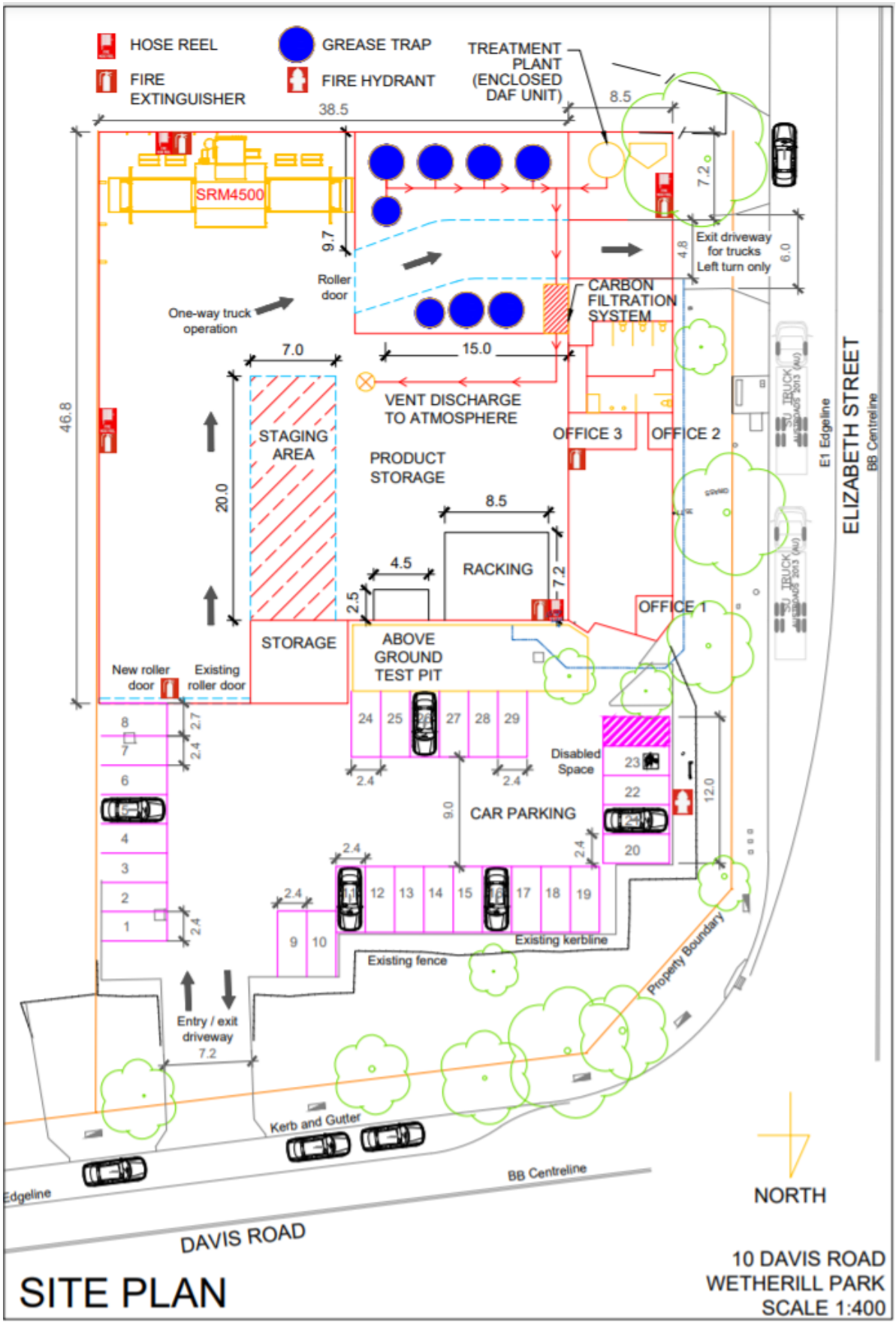


Figure 2.1: Site Plan (to be updated following construction)

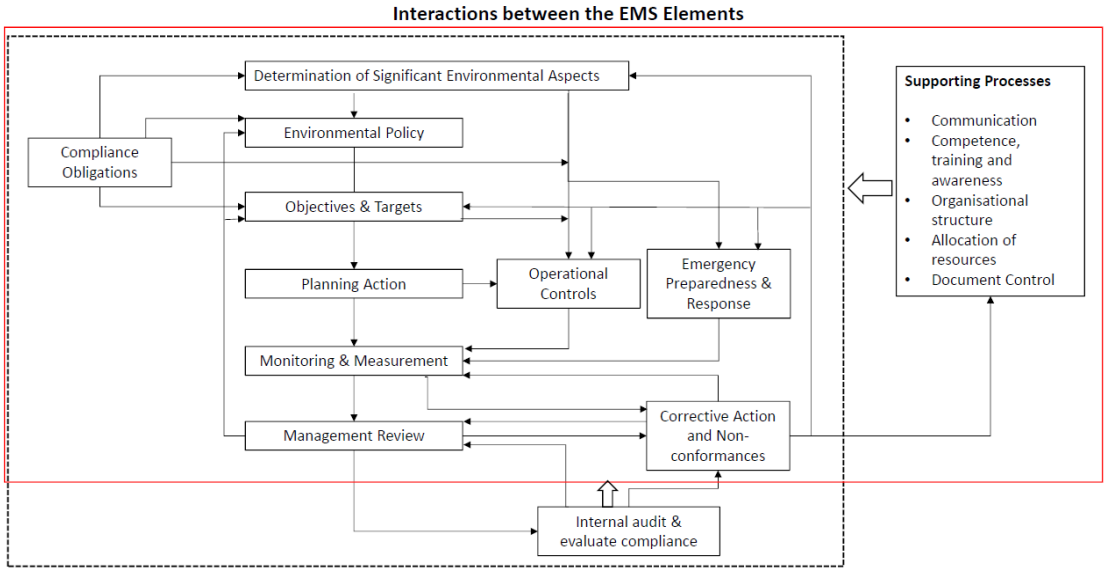
2.2 Scope of the OEMP

This OEMP is applicable to all operations undertaken by Halgan Pty Ltd. All staff and contractors are expected to comply with the requirements of this OEMP.

This OEMP has been developed to generally comply with the requirements of AS/NZS ISO 14001:2015.

The OEMP is a set of interactive processes or elements. Each process or element of the OEMP takes one or more inputs and creates one or more outputs to be passed onto one or more other processes or elements as depicted in **Figure 2.2** below.

Figure 2.2: Interactions between the OEMP Elements



This OEMP has been established to ensure all of Halgan's operations comply with the outlined environmental legislation and guidelines, environmental obligations and customer expectations. This OEMP will be implemented, maintained and continually improved. All procedures and documentation will be continually monitored to ensure they are managed and implemented appropriately and to ensure ongoing compliance with this OEMP.

3. Leadership

3.1 Leadership and commitment

Halgan's leadership group are responsible for ensuring the effective implementation and operation of the OEMP. They provide oversight to ensure that all statutory environmental requirements are complied with.

The leadership group are:

- Accountable for the effectiveness of the OEMP;
- To ensure the environmental policy and environmental objectives are established and are compatible with the strategic direction and context of the organisation;
- To ensure that the resources needed for the OEMP are available;
- To communicate the importance of effective environmental management and conform to OEMP requirements;
- To ensure that the OEMP achieves its intended outcomes;
- To direct and support persons to contribute to the effectiveness of the OEMP;
- To promote continual improvement; and
- To support other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

3.2 Environmental policy

Halgan have implemented an Environmental and Sustainability Policy to ensure the organisations ongoing commitment to the protection of the environment and the prevention of pollution. A copy of the Environmental and Sustainability Policy is included in **Appendix A**.

3.3 Roles and Responsibilities

All staff have an element of environmental responsibility. Managers have additional environmental responsibilities for the work that they are responsible for.

For reporting purposes, the WHSE Manager reports to the Operations Manager, who reports to the Managing Director.

3.3.1 Managing Director

- Provide adequate resources to ensure effective implementation and operation of the OEMP.

- Provide oversight to ensure that all statutory environmental requirements are complied with.

3.3.2 Waste Operations Manager

- Operational accountability for environmental compliance.
- Accountable for compliance with this OEMP, including development and implementation of appropriate Environment & Safe Work Method Statements (ESWMS) and Environment Work Method Statements.
- Respond to action requests issued by clients.
- Ensure sufficient time and resources available for the effective operation of this OEMP.
- Assist with the implementation of policies and procedures designed to ensure that impacts on the environment are minimised.
- Respond to environmental issues and non-conformances raised by site personnel.
- Undertake site inspections to meet OEMP requirements.
- Ensure that effective consultation occurs with clients, subcontractors, Site HSE Coordinators and Plant Production Teams.
- Provide feedback on environmental issues to clients and the Leadership Team.
- Ensure that all current relevant environmental legislation and requirements are adhered to.
- Ensure that all personnel are adequately licensed, trained and qualified for the tasks assigned to them.
- Periodically review the effectiveness of this OEMP.
- May issue stop work notices.
- Provide, as far as practicable, a working environment that is safe without risk to the environment.
- Ensure that all hazards are identified and documented and associated risks assessed to eliminate or control the hazards; this is to be maintained in the Aspects and Impacts Register.
- Ensure sufficient time and resources are made available for the effective operation of this OEMP.
- Assist with the implementation of policies and procedures designed to ensure that impacts on the environment are minimised.
- Respond to environmental issues and non-conformances raised by site personnel or raise non-conformances if required.
- Undertake site inspections to meet OEMP requirements.
- Ensure that effective consultation occurs with clients, subcontractors, WHSE Manager, Site HSE Coordinators and operations staff.
- Provide feedback on environmental issues to clients and the Managing Director.

- Ensure that all current relevant environmental legislation and requirements are adhered to.
- Ensure that all personnel are adequately licensed, trained and qualified for the tasks assigned to them.
- Periodically review the effectiveness of this OEMP.

3.3.3 WHSE Manager

- Ensure that the OEMP procedures and policies are established, implemented, maintained, monitored and continually improved.
- Establish and maintain processes and procedures to identify and assess (and where practical, eliminate) environmental hazards and control risks.
- Establish and maintain processes and procedures for the reporting and investigation of all incidents.
- Monitor the adherence to the OEMP and statutory environmental requirements.
- Provide ongoing and effective environmental promotion.
- Establish and maintain access to all current legal and other requirements that are directly applicable to environmental issues relating to all Halgan's operations/activities, products, services and relationships with subcontractors.
- Provide support to all staff members on all environmental issues as required.
- Undertake site inspections to meet OEMP requirements.
- Ensure that all hazards are identified and documented and associated risks assessed to eliminate or control the hazard.
- Provide feedback to staff/contractors on environmental performance.
- Investigate environmental incidents and dangerous occurrences.
- Investigate and report any environmental issues and non-conformances identified by clients, subcontractors and third parties.
- Ensure that environmental induction training is provided for all new employees upon the commencement of their employment activities onsite.
- Ensure the proper filing and retention of all related environmental site records and documentation.
- Provide relevant environmental documentation to clients as required.
- Consult with clients, staff and subcontractors about changes in the workplace that may affect the environment.
- Provide feedback on environmental issues to the Services Manager and Project Managers, as appropriate.
- May issue stop work notices.

3.3.4 Employees and Subcontractors

- Comply with all current environmental legislation, requirements and procedures.
- Complete site inductions before commencing work.

- Review and comply with OEMP, procedures etc.
- Complete relevant permits to work, before commencing work onsite.
- Attend and participate in pre-start meetings.
- Report any situation at the workplace that could constitute a hazard to the environment that is recurring, or cannot be corrected immediately to the Services Manager and/or WHSE Manager.
- Report any environmental non-conformances immediately to the Waste Operations Manager and/or WHSE Manager.
- Report any environmental incidents that arise in the workplace.
- Undertake any training provided in relation to the environment.
- Satisfactorily complete the site environmental induction upon commencement of employment on site.
- Only undertake tasks that you are adequately licensed, trained and qualified for.

4. Planning

4.1 Risks and Opportunities

4.1.1 General

The identification and communication of legislative, regulatory and other requirements relevant to Halgan's operations is ongoing. The Environmental Policy and Local, State and National legislation will be reviewed annually as a minimum. The WHSE Manager will report to the Waste Operations Manager the consequences of changed or new legal and other issues to other personnel for incorporation into the daily practices, documentation or environmental control procedures.

4.1.2 Environmental aspects

Methods to be used by Halgan are well established and staff have proven performance records on operational controls and maintenance work. Hence a strong body of data was used to carry out the environment and compliance risk assessment.

Aspects of operations which have the potential to impact the environment were identified during a risk assessment process. From this a Register of Environmental Aspects and Impacts was developed (See **Appendix C**). The register will be reviewed as deemed necessary from performance monitoring, and as a minimum will be reviewed annually.

Each identified environmental aspect is subject to a qualitative risk analysis based on likelihood and consequences of environmental impact or impact on the organisation from environment-related issues, in the context of existing measures to control the risk. Both positive and negative impacts can be considered. The risk analysis matrix is as follows:

	Very Likely	Likely	Unlikely	Very Unlikely
Catastrophic	1	1	2	3
Severe	1	2	3	4
Moderate	2	3	4	5
Minor	3	4	5	6
Insignificant	4	5	6	6

The likelihood descriptions are:

Levels	Description
Very Likely	The event could happen at any time (> 90%) A strong probability of multiple occurrences within a 12 month period
Likely	The event could happen sometime (50% - 90%) Will probably occur at some time within a 12 month period
Unlikely	The event could happen but very rarely (10% - 50%) Might occur at some time in a 12 month period
Very Unlikely	The event could happen but probable never will (< 10%) Unlikely to occur within a 12 month period

The consequence categories:

Assessment	Financial [1]	Political / Reputation	Environment	Safety (Sydney Water & Public Safety)	Customers	Public Health	Performance [2]	Compliance
Catastrophic Very High impact with very significant consequences	Corporate: > $100m Project: Cost overrun >= 50% of project budget	Loss of Govt and widespread community confidence. Sustained key adverse media.	Large scale, irreversible, uncontained harm to the environment.	Fatality, amputation of limb, person on life support, other immediately life threatening incidents. Widespread serious injuries or illnesses.	Complete disruption to services > 1 week. Affects > 30% of SWC customers.	Widespread illness / fatalities.	Very significant non-performance against: . corporate goals and targets . project objectives and targets.	Significant compliance breach - may result in: Operating Licence sanction, high-impact prosecution eg Tier 1 POEO Act offence.
Severe High impact with major consequences	Corporate: > $50m - $100m Project: Cost overrun > 20% and < 50% of project budget	Considerable Govt and community concern. Key adverse media.	Large scale, long-term (>2 years), uncontained harm to the environment.	A serious injury or long term illness, or lost time injury (minimum 1 day lost per injury).	Partial disruption > 2 days. Affects 10% to 30% of customers in system. Widespread complaints.	Serious illness requiring hospitalisation.	Significant non-performance against: . corporate goals and targets . project objectives and targets.	Compliance breach - may result in severe enforcement action, regulatory sanction or prosecution eg Tier 2 POEO Act offence.
Moderate Noticeable impact with clearly visible consequences	Corporate: > $10m - $50m Project: Cost overrun > 10% and < 20% of project budget	Some public concern raised. Adverse local media.	Small scale, medium-term (1-2 years), uncontained harm to the environment eg small fire on SW site that damages adjoining protected bushland	Significant near miss incident; Injury or illness requiring medical treatement.	Unreliable services. Increase in number of complaints. 5% to 10% of customers affected.	Deterioration in water quality parameters. Reportable event. Increase in illness.	Non-performance against: . corporate goals and targets . project objectives and targets.	Compliance breach - may result in Ministerial requirement, enforceable undertaking or statutory fine eg POEO Act Penalty Infringement Notice.
Minor Minor impact with some consequences	Corporate: > $5m - $10m Project: Cost overrun > 5% and < 10% of project budget	Minor public concern.	Short-term (< 1 year), reversible, contained harm to the environment. eg. Damage to a heritage listed building	Illness or injury requiring first aid eg. Minor burns, abrasions, sprains.	Multiple customer complaints.	Deterioration in water quality parameters. Reportable event. No increase in illness.	Some non-performance against: . corporate goals and targets . project objectives and targets.	Compliance breach - may result in minor corrective action or business requirement.
Insignificant Very minor impact with unimportant consequences	Corporate: < $5m Project: Cost overrun < 5% of project budget	Minimal public concern.	Temporary, reversible, environmental degradation eg. Industrial noise emissions at night	Near misses incidents.	Isolated customer complaints.	Non-reportable event.	Very minor non-performance against: . corporate goals and targets . project objectives and targets.	Technical compliance breach with limited material impact.

Financial limits for projects are a guide only. Actual amounts should be set at an appropriate level (based on business case value) for each individual project prior to conducting a risk assessment.
Performance category descriptions are a guide only and may be further enhanced by divisional procedures.

Standard environmental safeguards to be applied have been included in this aspects and impacts register.

The need for any site-specific aspects and impacts will be captured in an Environmental Work Method Statement (EWMS) for loading and/or transporting waste and treated material.

4.1.3 Compliance obligations

Halgan is subject to several legal requirements regarding its environmental aspects. Halgan's WHSE Manager is responsible for monitoring legal obligations, and ensuring they are kept up to date. Regulation and reporting is primarily related to NSW Environmental Protection Authority (EPA), Fairfield City Council and Sydney Water.

The Register of Compliance Obligations details the specific requirements applicable to Halgan operations, and sets out how the requirements apply to the organisation's environmental aspects. It is maintained by the WHSE Manager. The WHSE Manager is also responsible for reporting on changing legal or compliance requirements related to the environmental aspects in management reviews.

Halgan' compliance obligations are taken into account in establishing, implementing and maintaining the environmental management system.

The Register of Compliance Obligations is located in **Appendix D**.

4.2 Environmental objectives and planning

4.2.1 Environmental objectives

Environmental performance has been built into the programme management framework through a number of measureable objectives. The objectives used to measure Halgan' environmental performance have been established to encourage and reward appropriate environmental performance and are reviewed at least yearly to ensure that they are achieving their purpose.

It is Halgan' stated goal to meet or exceed the Minimum Acceptable Performance (MAP) for these objectives.

In implementing the environmental performance objectives, Halgan seek to:

- Identify and eliminate reportable environmental incidents.
- Maintain accurate reporting and record keeping.
- Monitor site performance and audit sites regularly.
- Control environmental risks using a rigorous risk assessment process.
- Maintain statutory compliance.
- Prevention of pollution and damage to the environment.
- Encourage training, skilling, awareness and best practice to meet legislative requirements.
- Strive for outstanding performance in the achievement of environmental objectives.

5. Support

5.1.1 Resources

Various positions in Halgan have roles, responsibilities and authorities for managing environmental aspects, action plans, programs and controls. All of these roles, responsibilities and authorities are documented in Section 3.

The WHSE Manager has responsibility for overall coordination of the environmental management system in accordance with the requirements of AS/NZS ISO 14001:2015 and reporting its performance, including recommendations for improvement, to top management for review.

The WHSE Manager is responsible for ensuring that Halgan has adequate resources to ensure the proper maintenance, implementation and review of this OEMP. The WHSE Manager is also responsible for ensuring that all staff and contractors are inducted into this OEMP, and receive the appropriate training to ensure ongoing environmental management.

5.1.2 Competence

Positions and roles which have responsibility for an activity, product or service that has potential to cause a significant environmental impact are required to have sufficient competence to fulfil the position and role. Competence refers to the knowledge, understanding, skills or abilities required for a person to effectively and efficiently carry out the position or role. Competence can be determined through appropriate education, training, experience and assessment.

For each person in each position and role, competence possessed, training needs, and training or other personal development undertaken to acquire the required competence are also recorded in the Responsibility Matrix to be maintained by the WHSE Manager. Copies of education and training qualifications are maintained in personnel files in the administration office.

The Responsibility Matrix is updated annually, with changes to positions, roles and staff, and training or other personal development undertaken.

5.1.3 Awareness

General awareness of Halgan' OEMP is propagated through an OEMP training package provided during induction of staff and contractors, as well as in refresher sessions. General OEMP awareness is assessed following the induction and refresher sessions, and records of assessment are maintained in the administration office.

More specific training on the Halgan OEMP is provided on documented operational procedures and emergency preparedness and response as required. Records of such training are made in the Responsibility Matrix.

5.1.4 Communication

Information about Halgan' environmental aspects and OEMP is communicated among the levels and functions of the organisation through:

- The OEMP awareness training provided during induction and at refresher sessions;
- Provision of this OEMP and supporting documentation on the Halgan document management system;
- Provision of the results of monthly monitoring of the environmental performance on the intranet and on noticeboards throughout the office; and
- Pre-start and weekly staff meetings.

The WHSE Manager is also responsible for reporting on communication from external interested parties, including complaints, in management reviews.

External communication required during response to emergency situations and accidents is documented in the Emergency Response Plan and PIRMP.

Halgan will decide on a case by case basis whether to communicate externally about its significant aspects. Top management and the WHSE Manager will be involved in making this decision. Records of all communication will be kept, including Halgan's responses, and the communication will be tracked in the environmental corrective and preventive action process.

5.2 Documented information

5.2.1 General

A Register of Documents and Records is located within the Halgan Quality Management System. This register lists policies, manuals, procedures, plans, external documents, registers, forms, templates and records relevant to the environmental management system.

5.2.2 Creating and updating

All policies, manuals, procedures, plans, external documents, registers, forms, templates and records will be created in accordance with the requirements of the Quality Management System.

5.2.3 Control of documented information

All OEMP documents are filed within the Halgan record management system. Each internal document is identified by a unique name and a last updated date and listed in the Register of Documents and Records. Each external document required for the OEMP is also recorded in this register.

This OEMP manual specifies the frequency for which certain documented information is revised. For example, the environmental policy, environmental aspects, compliance obligations, and objectives and targets must be revised at least annually, while the Responsibility Matrix requires quarterly revision.

6. Operation

6.1.1 Operational planning and control

The following documented procedures and work instructions have been devised on the basis of risk to control operations associated with significant environmental aspects, including the significant environmental aspects of goods and services used by Halgan:

Table 6.1: Work Instructions

Work Instruction	Description	Application
TR-WI-2002	Project Management	In Use
TR-WI-2004	Sub-contract administration	In Use
TR-WI-2005	Purchasing	In Use
TR-WI-2006	Engineering & Design	In Use
TR-WI-2007	Project closing activities	In Use
TR-WI-2008	Site Activities	In Use
TR-WI-2009	Resource Management	In Use

Table 6.2: Procedures

Procedure	Description
TR-QP-2050	DOCUMENT CONTROL
TR-QP-2052	AUDITING
TR-QP-2053	NON-CONFORMING PRODUCT
TR-QP-2054	CORRECTIVE ACTION
TR-QP-2055	PREVENTATIVE ACTION

These procedures and work instructions are also listed in the Quality Management System Manual.

6.1.2 Emergency preparedness and response

Halgan identifies potential emergencies and accidents that can have an environmental impact during the identification of environmental aspects. Environmental emergencies and accidents are therefore subject to risk analysis and determination of environmental significance and handled accordingly in the OEMP. Objectives and targets are set for environmental emergencies and accidents that are regarded as significant environmental aspects and an emergency response plan is established to achieve the objectives and targets.

Environmental emergencies and accidents are regarded as environmental non-conformances. Accordingly, in the event of an occurrence, immediate action is taken to mitigate the environmental impact, followed by corrective action to avoid a recurrence.

The emergency response plan is tested each quarter. Planned tests are recorded in a Register of Emergency Response Tests. The organisation's occurrence of each environmental emergency and accident using the Identify Non-conforming Product/Process Form. The aspect identification and significant impact determination of an environmental emergency or accident, and the emergency response plan are revised where appropriate after a review.

6.1.3 On Site Emergency Procedures

Before commencing work on site, all workers and subcontractors are to receive the site induction and familiarise themselves with any site-specific environmental procedures and the location of the following equipment (where applicable). This information will form part of the site induction process:

- First Aid kits
- Eyewash facilities
- Emergency showers
- Emergency evacuation plans, emergency exits and muster points
- Emergency contact numbers and communication processes
- Spill response material and equipment

Workers and subcontractors are to assess the area in which they will be working and are to: -

- Assess the potential for emergency situations to arise (eg. fire, chemical spills)
- Workers and subcontractors will comply with all client requirements and procedures in the event of an on-site emergency situation unless instructed otherwise.

6.1.4 Incident Attendance

For all incident situations that may result in injury or damage to the environment, workers and subcontractors are to report the incident to:

- WHSE Manager
- Waste Operations Manager

The Waste Operations Manager is the primary incident manager for any incident.

Environmental incidents may require additional notification to the EPA or other organisations (refer PIRMP).

Pollution incidents causing or threatening environmental harm must be reported as soon as practicable to the EPA, the NSW Department of Health, SafeWork NSW, Fire and Rescue NSW and Fairfield City Council. These notifications would be made by the Waste Operations Manager, WHSE Manager, and the Managing Director (if applicable).

All incidents which have (or may have) environmental impact:

- Chemical or bulk liquid Spills
- Odour control system non-compliances
- Uncontrolled wash-off from activities.
- Damage or destruction of threatened species (flora or fauna)
- Damage/ destruction to Natural, cultural and/or Aboriginal heritage.

7. Performance evaluation

7.1 Monitoring, measurement and evaluation

7.1.1 General

Checking and reporting will ensure that there is continual feedback and improvement. Mechanisms include site inspections and audits, system audits and quarterly performance reporting.

Monitoring and measurement procedures are developed and implemented to confirm that all activities comply with relevant limits and standards, and that workers and sub-contractors are performing in accordance with required environmental safeguards. At a Programme level, this involves quarterly reporting by the management team, KPI compliance and incident notification.

An annual Schedule of Monitoring and Measurement is used to record data on the Halgan' environmental performance on a monthly basis.

The WHSE Manager is responsible for analysing the results of monitoring and measurement and reporting on the environmental performance of Halgan, in particular the extent to which environmental objectives and targets have been met, in management reviews.

7.1.2 Evaluation of compliance

Once a year, a review or compliance audit is conducted to evaluate compliance with legal requirements applicable to the agency and other requirements to which the organisation subscribes. This is undertaken by completing the following to columns in the Register of Compliance Obligations: Evidence required for compliance; and evaluation of compliance (yes/no).

The register that is completed in this review or compliance audit becomes a record of the evaluation of compliance. Where non-compliance is detected, this is followed up with corrective action.

7.2 Internal audit

7.2.1 General

An Internal Environmental Audit is to be undertaken yearly. Environmental audits are to be undertaken to review and verify the status of compliance against this OEMP, and relevant ESWMSs.

The results of all audits / inspections will be stored in the Halgan database.

7.2.2 Internal audit programme

Halgan has established and implemented an annual internal audit program with the objective of determining whether the environmental management system conforms to planned arrangements, including the requirements of AS/NZS ISO 14001:2015 and this OEMP manual, and has been properly implemented and maintained.

The WHSE Manager manages the internal audit program and reports the results of internal audits and the effectiveness of the program to top management.

The internal audit program covers all of Halgan' operations units and functions, environmental management system elements.

Audit criteria in the program include the requirements of AS/NZS ISO 14001:2015 for OEMP, the requirements of this OEMP manual, the requirements for work instructions listed in this manual to control operational activities associated with significant environmental aspects, and compliance obligations.

One audit each year is devoted to evaluating compliance with compliance obligations. The Register of Compliance Obligations is used to record the evidence and findings of this audit.

An Internal Audit Checklist is used to record evidence for audits of the requirements of AS/NZS ISO 14001:2015 and this OEMP manual. Findings of such audits are reported using the corrective action process outlined in Section 6.

Non-conformances raised in internal audits are entered into the Register of non-Conformances to the WHSE Manager, and subject to appropriate corrective and preventive action.

7.3 Management Review

Formal Management Review of this OEMP is to be undertaken by the Waste Operations Manager to ensure its continuing suitability, adequacy and effectiveness. Management Reviews are to be recorded in the programme environment directory.

Management Review of the OEMP is undertaken annually as a minimum and will address any areas of non-conformance or areas for improvement identified during annual audits.

The management review addresses issues such as the possible need for changes in policy, objectives (including KPIs); as well as approving any actions to rectify non-conformances identified in the annual Audit. The Management Review will also address changing circumstances (e.g. changes to legislation) programme scope and the commitment to continual improvement.

8. Improvement

8.1 General

This section describes how all Incidents are to be reported, investigated, risks assessed and action taken to prevent future occurrences.

8.2 Nonconformity and Corrective Action

Non-conformances identified on site could be in the form of any of the following:

- Environmental issues raised by clients
- Environmental issues raised by staff members and/or subcontractors
- Environmental issues raised by the neighbours or agencies.

All environmental non-conformances must be reported to the Waste Operations Manager. Interested parties are made aware of the situation and that the required Preventative and/or Corrective Action is taken.

8.3 Continual improvement

Details of all incidents are to be recorded in the non-conformances register by the WHSE Manager. The non-conformances register manages notifications and close-out of all records is managed by the WHSE Manager. The recording and corrective action of all non-conformances will drive continual improvement.

Appendix A Environment Policy

To be be reviewed and updated to incorporate liquid waste operation, when approved.

Appendix B Checklist & Register Templates

To be included:

- Daily Environmental Inspection Checklist
- Monthly Environmental Audit Checklist
- Emergency Response Test Register
- Internal Audit Schedule

Appendix C Environmental Aspects and Impacts

Risk Assessment below from EIS. To be reviewed and updated prior to finalisation of OEMP.

Aspects	Potential impact example	Overall Consequences	Overall Likelihood	Risk Rating	Proposed Mitigation Measure	Effectiveness	Effectiveness Factor	Residual Risk Rating
Waste Management	Integrity of waste management processes, and the potential for harmful adverse impacts on the surrounding area because of waste handling and transport.	Major	Possible	12 High	Refer Section 5.3 & 7.0	Effective	7	5 Medium
Air Quality - Odour	Odour from operations affecting surrounding landowners.	Major	Possible	12 High	Refer Section 6.4	Effective	7	5 Medium
Traffic and Transport	Increased traffic on the roads leading to site and site ability to safety operate within increased traffic flow.	Minor	Likely	8 Medium	Refer Section 6.6	Effective	7	1 Low
Noise	Noise from construction, operations and transport (traffic and transfer trucks in and out of site), machinery, and plant upon sensitive receivers.	Minor	Possible	6 Medium	Refer Section 6.5	Partly Effective	3	3 Low
Soil and Water	Leachate leaving site, impacting downstream environments.	Major	Unlikely	8 Medium	Refer Section 6.2	Effective	7	1 Low
Flood	Flooding impacts from further development of site.	Minor	Unlikely	4 Medium	Refer Section 6.2	Partly Effective	3	1 Low
Hazards	Breakdowns in operational procedures and/or storage and transport of materials may give rise to hazards and toxicity.	Major	Unlikely	8 Medium	Refer Section 6.12	Effective	7	1 Low

Appendix D Register of Compliance Obligations

When secured and available, insert Table of:

- NSW EPA (GTA and Licence conditions)
- NSW EPA Resource Recovery & Waste Classification requirements
- WasteSafe or other transport requirements
- DA Conditions
- Sydney Water Trade Waste Agreement conditions

Appendix E Compilation of Mitigation Measures

Table 7.1: Draft Compilation of Mitigation Measures (from EIS Section 7)

Draft Compilation Mitigation Measures
Water, Quality, Drainage and Soils
Construction Plans (CEMP) to include and implement following measures: - All works to be carried out within bunded, paved areas; - External areas to be kept clean and tidy and swept regularly, especially before rain events; - Daily inspections to be carried out; - Should the need for excavation arise during construction due to unforeseen circumstances (eg utility connections), excavated soil would be stored in skip bins, sampled and classified in accordance with NSW EPA Waste Classification Guidelines, and reused as fill or disposed-off appropriately. - If excavation is needed, work would be carried out in accordance with the CEMP and the requirements of the NSW Department of Housing's Managing Urban Stormwater – Soils and Construction (Landcom, 2014). - Sumps are inspected and managed to ensure the site discharge is not contaminated. - All stormwater drains on site will be fitted with strainers to remove larger waste that may have been dropped on site. **Operational Plans (OEMP) to include and implement following measures:** - In the unlikely event of flooding on the site, the following flood controls should be incorporated into Incident and Evacuation Plans: - Workers are prevented from leaving the site, this includes within motor vehicles (except as directed by emergency services) - Site waste transfer activities are halted and chemicals are returned to designated storage areas - Warehouse roller doors are closed and if possible barricaded ideally with sandbags - Pollutant shut valves are to be engaged to prevent release of contaminants - Staff are to evacuate to the designated safety areas - Contacts with emergency services for evacuation, support and advice - Under no circumstances should access be permitted to people on foot or in vehicles (except as directed by emergency services) to Davis Road when in flood. Davis Road has significant depth and velocity flood water when compared to the 10 Davis Road property. - Electrical contact points to be set at a level no less than RL36.2 (maximum 1 in 100 Year flood height plus 500mm freeboard). A higher level should be considered where critical infrastructure is required even during inundation i.e. for emergency lighting etc.; - Waste transfer areas are bunded to RL36.2 or have controls in place which prevent unguarded waste being contained below RL36.2 for long periods of times, say more than a day duration

Draft Compilation Mitigation Measures
- All works to be carried out within bunded, paved areas; - External areas to be kept clean, tidy and swept regularly, especially before rain events; - Daily inspections to be carried out.
Biodiversity
- Existing trees will be protected and maintained; - Should fauna and flora species and ecological communities be identified during any works, construction and/or operation will cease in the vicinity of the find and the appropriate representative at NPWS will be contacted.
Air Quality (Dust & Odour)
- Availability of spill kits to allow for prompt containment of spills which could be odorous; - Stringent housekeeping regime, subject to inspection and audit; - Regular inspection and cleaning of any inground sumps; - Installation and operation of best-practice foul air collection and scrubber system; - Minimum exit velocity of 10 m/s from the OCU discharge vent; - Segregated area to be kept under negative air pressure; - Implementation of a waste acceptance evaluation procedure to ensure all waste received on site meets the relevant criteria; - Careful facility design to capture odour point sources and limit potential for fugitive emissions to be generated; - Closure of internal roller doors during all waste unloading activity to minimise the potential for fugitive odour emissions; - Waste transferred regularly to reduce volumes and risk of fugitive emissions; - Vector/pest control program to be implemented; - Good neighbour program, monitoring and contact management program to be implemented; - Cleaning of vehicles where necessary prior to departure from site; - Use of odour neutralisers if required; - Availability of spill kits to allow for prompt containment of spills which could be odorous; - Stringent housekeeping regime, subject to inspection and audit; - Regular inspection and cleaning of any inground sumps; - Daily odour survey observations around the boundary of the site; - Work procedures in the event of any particularly odorous loads (e.g. use of odour neutraliser, identifying waste source and investigating possibility of treating off-site or diverting to another waste facility); - Additional OCU medium on-site at all times (e.g. additional activated carbon to be stored on site and used once the OCU has reached capacity).

Draft Compilation Mitigation Measures
Noise & Vibration
- Careful facility design to limit potential for noise to be generated; - Installation and operation of plant and equipment that minimises noise during operation e.g. selection of extraction fans to minimise noise, use of neoprene washers and fixings to minimise noise and vibration from pumps; - Segregated area kept under negative pressure. All air discharged to atmosphere; - Closure of rollers doors during all waste unloading activity to minimise noise amenity impacts on neighbours; - Good neighbour program, monitoring and contact management program to be implemented; - Stringent maintenance regime, subject to inspection and audit.
Traffic, Access and Parking
Controls should be implemented during construction and operation to ensure all vehicles exiting the site into Elizabeth Street must turn left. Controls to include directions, pavement markings and signage.
Heritage
In the event of excavation being required due to unforeseen circumstances and a potential indigenous or non-indigenous heritage item being encountered, works would immediately cease, and the site secured until investigations have been carried out.
Visual Amenity, Social and Community
The air discharge stack would be of similar colour and finish to the existing roof to minimise visual impact.
Public Health & Safety
Waste Collection and Transport to and from Site: - Wastes transported in enclosed tanker trucks; - Compliance with WasteSafe tracking system as required; - Training in appropriate procedures provided to operators and truck drivers, including emergency and spill response. **Unloading, Handling and Storage on Site:** - Products transferred as soon as possible (generally 12-hour turn over max 24-hour residence time); - Unloading via vacuum. Receival bays and storage areas designed to be well ventilated, contained with bunds in accordance with NSW EPA and WorkCover requirements, and secure from vermin and insect pests; - Internal liquid transfer via hard plumbed pipework; - Areas maintained with best practice housekeeping standards; - Training of operators in waste handling and emergency and spill response procedures; - Liquid wastes to be kept separate from other waste types.

Draft Compilation Mitigation Measures

Employee Exposure to Contaminants:

- All tanks will be vented with any “off gases’ directed to an odour management system, scrubbed and treated prior to discharge to atmosphere;
- All employees will be provided industry standard Personnel Protective Equipment to ensure their safety while on site;
- The liquid treatment facility will be constructed to ensure employees are not exposed to or come into contact with waste being received or treated at the site.
- Once the liquid waste is transferred from the delivery vehicle to the receival tank all process within the facility are automated;
- All tanks are hard plumbed to eliminate employee interaction with material. The system will be designed run via a PLC process with employees managing transfer and process via a touch screen system;
- In the event that employees are required to override the automated system they will be required to wear appropriate PPE to safeguard against any part of the body coming into contact with liquid waste;
- Prior to commencing operation in the treatment facility all employees will be inducted and provided full training for the safe operation of the treatment facility.
- Regular site audits will be conducted to ensure operators are working in accordance with company policies and procedures;
- Annual health monitoring of employees.

Wastewater Management:

- All wastewater to be discharged to Sydney Water sewer via approved flow meter and hard-plumbed pipework.

Stormwater Management:

- Prevention of stormwater entering process and handling areas through use of roofs and bunds.

General Traffic and Road Safety:

- Training in appropriate procedures provided to operators and truck drivers, including emergency and spill response;
- Transport by enclosed, suitable trucks;
- Clear signage around site to define what traffic is permitted in what areas on site.

Control of Vermin and Insect Pests:

- Use of professional pest control contractors and systems as appropriate (e.g. Rentokill or similar) to eliminate insects and rodents etc;
- Design incorporating proper site drainage to prevent stagnant wet areas that attract mosquitoes and other insect pests;
- Training of all staff in correct handling, use of appropriate PPE, and control of vectors;
- Rigorous monitoring and auditing of the effectiveness of the above controls;
- Inspections and learnings from many other waste treatment facilities

Draft Compilation Mitigation Measures
Preventative Measures for Community Exposure: - Community exposure is deemed low due to the air management controls that will be operational within the facility; - Under normal circumstances exposure issues are related to uncontrolled storage or transfer of waste. The facility will be constructed within and existing building ensuring all “fugitive” odours are captured and managed via the odour control systems; - The community will not be aware of the existence of the facility as the overall operations will be within a secured building; - Site boundary checks will be completed daily to ensure there are no detectable odours at the site boundaries which could impact adjoin properties or the public. **Security**: - Restricted public access; - Site bounded by appropriate security fences, with a 24hour camera; - Warning signs displayed at appropriate locations around site. **Health and Safety**: Facility to be operated in accordance with the “Work Health and Safety Regulation 2011”, including: - Representation and participation: employees will be required to participate in onsite Safety Audits to ensure operations are conducted in accordance with the Regulation; - Issue Resolution: issues and problems that arise will be dealt with immediately in conjunction with the safety committee members. Appropriate action will be taken to minimise employee dissatisfaction and maintain stability within the workplace; - Managing risks to health and safety: risk assessment will be conducted prior to the commencement of any new task or operation. Risk assessments will be reviewed regularly in conjunction with workplace inspection conducted by the Safety Officer; - Information, training and instruction: all employees will be site inducted prior to commencement. Operating instruction will be provided to ensure employees are competent and aware of all site operating procedures; - General working environment: risk assessment will be conducted prior to the commencement of any new task or operation; - First Aid: the site will contain the appropriate first aid requirements for the site. The first aid contents will be audited on a regular basis to ensure all components are in date and safe for use. A first officer will be appointed for the site; - Emergency Plans: an Emergency Plan (PIRMP) has been developed to ensure employees are trained and aware of correct actions to be taken in the case of an onsite emergency; - PPE: all employees will be provided (and required to wear) supplied / approved PPE. Replacement PPE will be available at all times.
Waste and Energy Resources

Draft Compilation Mitigation Measures
To minimise energy consumption and resource use: - Idling time of on-site plant and equipment would be limited; - only lighting left on overnight around the site office will be security or emergency/access lighting; - Equipment and on-site vehicles will be fitted with exhaust controls in accordance with the Protection of the Environment Operations (Clean Air) Regulation 2010; - Implement waste management plan (Appendix L) including induction, segregation of waste streams, recycling, and procurement process, during construction and operation. The following energy efficient features would be adopted to reduce emissions during operation: - Installation of a solar photo-voltaic rooftop system would be investigated to reduce energy consumption and greenhouse gases; - All trucks leaving the site carrying waste will be filled to the maximum reasonably practicable to reduce the number of traffic movements required; - Pumps, plant, and equipment to be selected and maintained to reduce energy use; - EURO 5 standard for Halgan trucks; - Timer switches and light sensors: where appropriate, lights within the transfer building would be fitted with timer switches and external lighting would be fitted with a light sensor.
Hazard & Risk Assessment
- The facility will continue to be supervised continuously during operation, audited regularly, and subject to an extensive range of monitoring procedures. Incident management and emergency response procedures will be implemented.
Fire Safety
- All mobile plant and equipment will be fitted with fire extinguishers; - An Emergency Response Plan will be prepared and implemented for the facility; - All staff on site will be appropriately trained in the handling of dangerous goods; - Flammable and combustible liquids with be stored in accordance with AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids; - Facility to be certified and plans updated.
Stakeholder Consultation
Stakeholder engagement activities will continue to develop and facilitate the engagement process as part of construction and operation management measures which may include: - Telephone line to communicate issues; - Complaints management process; - Updates of the Halgan website; - Clear signage at construction-sites during construction;

Draft Compilation Mitigation Measures
- Ongoing review and refinement of construction and operation impact mitigation measures.
Operational Management Plans
Prior to seeking Occupation Certificate and the EPA licence: - As-built plans to be prepared at completion of construction; - Certification that all works comply with Building Code of Australia (BCA) and Fire Safety requirements will be secured; - Emergency response plans, including evacuation plans and results of consultation with local Fire & Rescue to be updated; - Environmental and operational management systems and plans to be updated, and include all mitigation measures, training, monitoring, auditing and reporting requirements; emergency response, incident management and consultation.

Appendix F Draft PIRMP

Pollution Incident Response Management Plan

DRAFT: To be updated prior to commissioning & operation.

Purpose:

To ensure Halgan Liquid Waste operates in an environmentally responsible manner and with due diligence. To remain current with changes in Acts and Regulations, provide the necessary instructions, training and reporting framework for environmental management, incident response and Work Health and Safety.

Authority and Responsibility:

Directors have the authority and responsibility for ensuring that Halgan Liquid Waste acts with due diligence in:

- training all employees with the requirements of this procedure
- ensuring the necessary resources are allocated to remain compliant with this procedure
- monitoring all environmental incident data
- maintaining record data
- communication and reporting to relevant authorities
- media reporting

Environmental Incidents:

Include, but are not limited to:

- events or circumstances that are notifiable (see definition below), or which may result in the receiving of a warning, infringement notice or other penalty from a regulator;
- leaks, spills or releases of any substance (other than clean water) into water, air or land; explosion, and/or fire at Halgan liquid Waste site, or any other work site caused by or involving the services of Halgan Liquid Waste or employees.

A notifiable incident is defined as an incident that must be reported to the NSW Environment Protection Authority pursuant to the Protection of the Environment Operations Act 1997.

A notifiable incident is one that causes material harm to the environment. More specifically, the incident:

- involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; and/or,

- results in actual or potential loss or property damage in excess of $10,000, including the costs and expenses that would be incurred in taking all reasonable and practical measures to prevent, mitigate or remediate harm to the environment.

Protocol for Industry Notification of Pollution Incidents:

If the incident presents an immediate threat to human health or property, contact MUST be made to 000 in the 1st instance.

Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the **first responders**. They are responsible for controlling and containing incidents.

Immediately after calling Emergency Services the driver/operator must contact Halgan Management.

If the incident **does not** require action by the 1st responders, or a call to 000, the relevant authorities are to be contacted in the following order. The 24-hour hotline for each authority is given when available:

- the appropriate regulatory authority (ARA) for the activity under the POEO Act (usually the EPA or Fairfield City Council)
- the EPA, phone Environment Line on 131 555
- the NSW Health via the local Public Health Unit see www.health.nsw.gov.au/publichealth/infectious/phus.asp
- the WorkSafe NSW phone 13 10 50
- the local authority if this is not the ARA
- Fire and Rescue NSW – phone 1300 729 579.

The appropriate contact for the relevant local authority and Public Health Unit will vary. All necessary contact numbers should be found in advance and stored for immediate access should a pollution incident need to be notified. These contact numbers should also be identified in the Pollution Incident Response Management Plan prepared for the premises.

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by WorkSafe NSW.

Halgan Liquid Waste Onsite Contacts:

Name	Position	Contact Numbers
Kerry Hall	Director	0414 230552
Penny Hall	Director	0421 037893
Alexandra Commins	Director	0449 737490
Simon Price	Operations	0432 525528

EMERGENCY POLLUTION RESPONSE PROCEDURE:

Initial response by the driver / operator on site is to:

- Without putting one's self in danger, make the area safe
- If required and safe to do so, provide assistance to any injured persons;
- If a liquid spill, isolate and stop leakage if possible.
- Locate and Isolate drains if possible.
- Notify Halgan Liquid management immediately.
- Notify site manager/supervisor;
- Await further instructions

If adequate resources are not available to contain material released in a pollution incident and it threatens public health, property or the environment, Fire and Rescue NSW, NSW Police and the NSW Ambulance Service should be contacted for emergency assistance - phone 000.

Incident Categories:

All incidents MUST be reported immediately.

Halgan Liquid Waste class environmental incidents into the following categories:

Category 1 - Short term or minor incident with minimal or no effect on the environment. Eg. A small spill easily cleaned up by operator.

A report must be filled out and given to the Operations Manager upon returning to the depot or at end of day with drivers Log Sheet.

- **Category 2** - A moderate incident that requires extensive Company resource management to rectify with potential medium term harm to environment or public safety, or causes public complaint.

- **Category 3** A Major incident that can cause measurable environmental harm, with long term impacts, requiring emergency services assistance, or community concerns requiring significant rectification measures. Incidents that require assistance beyond he companies resources

Incident Reporting:

All environmental incidents must be reported to the Halgan Liquid Waste immediately.

The following information will be provided and assessed for response.

1. Name and contact details
2. Location of incident
3. Time of incident
4. Nature of incident

Management will assess the information on a risk basis and take the appropriate steps for the category requirements.

- **Category 1**

Internal reporting to Operations Manager via incident form.

- **Category 2 and 3 Incidents**

Report to Halgan Liquid Waste (02) …….

Halgan Liquid Waste Management to manage and report to:

Environment Protection Authority via Pollution Hotline 131555

Upon assessment of potential to manage incident if life, property or environment are under threat of harm:

- Local Council (Fairfield City Council) 9725 0222
- Fire & Rescue 1300 729 579
- Police 000
- Sydney Water 132 090 (24 hours)
- WorkCover 131050

Notification to Neighbouring Industries and Properties:

- In a category 2 or 3 event where pollution may result in damage or harm to the neighbouring businesses or properties they must be notified immediately.

  Should an emergency evacuation be necessary a copy of this PIRMP must be taken to the Evacuation Assembly Point and all notifications are to be undertaken by mobile phone from that point.

Staff Training:

Staff training, for emergency procedures which include, Fire, Evacuation, Spills and potential Pollution Incidents are to be carried out at least once per annum.

A record of training is to be kept on file in personnel files, secured in the office.

ENVIRONMENTAL INCIDENT REPORT FORM

This form is to be completed by the Halgan Liquid Waste driver or representative in attendance at the environmental incident. The completed form is to be forwarded to Halgan liquid Waste as soon as practicable or within 24 hours of the incident.

Incident Type	
Environmental Incident	☐ Environmental Complaint

Employee Details
Name:

☐ Yes
Address where Incident occurred:
Street: Suburb:
Nearest X Street:

Incident Details	
Date of Incident:	Time of Incident:
Type of Pollutant: eg (Grease Trap Waste, Odour etc)	
Estimated Quantity/Volume:	
Details of Incident: How/Why and steps taken to minimise Note: Attach separate sheet if	

Notification of Incident (To be completed by Halgan Liquid Waste)			
EPA Pollution Hotline	Yes / No	NSW Fire Service (Hazmat)	Yes /No
Local Council	Yes / No	Other:	

Incident Attended By:

Appendix G Treatment & Transfer Procedure

ELEMENT	TREATMENT QUALITY CONTROL		
Objective	To minimise the impact on the environment due to the facility's operation. To comply with *Environmental Protection Policy and Licence conditions*. To accept and treat grease trap in accordance with the NSW EPA and Sydney Water authority		
Management Strategy	Management practices proposed to be implemented to prevent or minimise adverse impacts. Provide effective treatment of Grease Trap waste within the Sydney Water "wastesafe" system		
		RESPONSIBILITY	**TIMING**
Actions	• Correct acceptance of incoming waste; • Regular checks of bunding to ensure integrity; • Ensure tanks and internal pipework is regularly maintained to reduce chance of leakage and spills; • All chemicals to be stored in bunded area in accordance with site conditions; • Ensure all staff are training in spill response; • All external contractors must be licenced in accordance with state legislation • Odour control operation to be checked daily • All liquid wastes to be stored in appropriately sealed tanks. • Site inspection to review air quality (morning / afternoon)	Treatment Supervisor	Daily
Performance Indicators	• Environmental discharge to meet conditions of approvals and/or licences. • Review of staff training schedule to ensure appropriate training has occurred in relation to spill response.	Operations Manager	Every 12 months
Monitoring	• Treatment Facility Supervisor to regularly inspect treatment process, site condition and internal warehouse and external land.	Operations Manager/ Treatment Supervisor	Throughout operation
Reporting	Logs to be kept of regular inspections: • Discharge to sewer • **Water clarity/ pH • Flow Meter • Carbon odour scrubber • Site condition • Discharge to atmosphere (annually) • Monthly discharge testing	Treatment Supervisor	As required
Corrective Action	• Where an incident has occurred, a detailed report of the incident and the cause shall be prepared and kept in the OMP log; and • Control measures are to be rectified and / or replaced in the event of non-conformance.	Operations Manager	Throughout operation
Interfaces	• External contractors / sub-contractors must comply with any other OMP contained in this report. • Current CoC's • Current licences	Treatment Supervisor	Daily/ongoing

Transportation of Liquid Waste

Halgan Liquid Waste maintains its fleet in accordance with all statutory regulations and is currently maintained by the vehicle manufacturer which is an MTA approved facilities.

All vehicles are cleaned and operated in an environmentally friendly manner. No truck-washing on-site

Prior to daily transport operations the driver is to undertake a “Pre Start” inspection of the vehicle. Pre Start books are to be kept in the vehicle at all times.

No vehicle is to be used if there are identified problems that make the vehicle not roadworthy.

All repairs are to be completed by a qualified mechanic (or suitably qualified person dependent on the repair)

If required upon arriving at site, the driver will report to the site office or contact person to liaise with them regarding the site-specific instructions. And, if necessary, undergo any required induction training for the safe completion of their work.

- Whilst on site Halgan Liquid Waste drivers will comply with all site specific WHS regulations.
- Within a site all vehicles will be driven in a safe and proper manner according to site regulations.
- All due diligence will be taken to ensure that during connection and disconnection of hoses and fittings there is no spillage leading to contamination of the area.
- Halgan Liquid Waster vehicles comply with State Transport requirements and comply with all regulatory requirements.
- Halgan Liquid Waster employees will be aware of other workers or general public in the vicinity and act in a professional manner to ensure their comfort and safety is maintained whenever possible.
- Upon completion of their work Halgan Liquid Waste employees will fill out the necessary documentation, recording the task undertaken by site, volume removed and where required, notation of time spent on location.
- When leaving the site (if required), the employees will again report to the site office or contact, and present documentation for signing and leave a copy of service docket or invoice with clientele.

Grease Trap Treatment Procedure

- **Prior to accepting any waste for treatment the following must occur:**

  Recieval vacuum pump to be operated to ensure full function

  Receival tank to be inspected and checked to ensure empty

  Storage tank levels to be checked.

  All plumbing to be inspected for leaks

  Operation of DAF inspected.

  Chemical storage inspected

- **During receivals the following must occur**

  All vehicles entering the facility must be a “dedicated” grease trap vehicle

  Vehicles must be registered with Sydney Water (Sydney services)

  Vehicles must have a QR2 capability

  All drivers must be inducted to site

  Vehicles will only unload in designated area

  Operator only to use vacuum unloading system

  All waste will be weighed and a docket provided to the driver

  Once the vehicle is empty the operator will remove the vacuum hose.

  Drivers will be instructed to exit the site via the Elizabeth St exit and turn left only to eliminate traffic issues

  Operator to check the solids screen and removed material as and when required

- **Transfer of received material**

  Once the vehicle has exited the site the operator is to immediately transfer the waste from the recieval tank to 1 of the process tanks.

  Prior to transfer the operator is to check the information scree to ensure the tank to be used is empty or capable of receiving the waste volume) and open the valves ready for transfer.

  The operator is to then commence the transfer via the transfer pump.

  Once the waste is transferred to valve is to be closed via the screen.

  The operator then checks the receival tank ensuring it is ready for another load.

- **Waste Transfer & Processing**

All process tanks are timed to allow a minimum of 4 hours settling to comply with the EPA Treated Grease Trap Exemption.

All tanks are to be monitored via the screen.

Once the waste settled the operator is to transfer the settled water to the pretreatment tank.

Once the settled water is transferred the operator then transfers the remaining waste to the sludge holding tank.

- **End of Day**

Inspection of water discharge to sewer

Isolation of all valves

Isolation of all pumps

External site inspection to check on odour scrubber effectiveness

Working areas clean and tidy

Appendix H Schedules & Sub-Plans

Schedules & Sub-Plans to be inserted eg

- Fire Safety Schedule
- Occupancy Certificate
- Waste Management Plan