

Operational Environmental Management Plan - Banksmeadow Transfer Terminal

November 2022

Quality Information

Details:	Original OEMP Prepared by:	Updated OEMP Prepared by:	Reviewed By:	Authorised by:
Name:	Ramona Bachu BSc, GradDip, MEEM, DipPM	Anae Ressos BEnv	Bob Manevski and Nicole Boukarim	Kelly Gee
Position:	NSW Environment Officer	Environmental Coordinator	Facilities Manager - Banksmeadow / Port Botany NSW Environmental Compliance Advisor	Environmental Manager (NSW/ACT)
Signature:			 	

Company:	Veolia Environmental Services (Australia) Pty Ltd
ABN:	20 051 316 584
Line of Business:	Waste
Facility:	Banksmeadow Transfer Terminal
Address :	14 Beauchamp Road and 34-36 McPherson Street, Banksmeadow NSW

Rev	Revision Details	Issued to	Date
0.1	First draft for internal review	NSW Strategic Planning, Development and Projects Team NSW Technical and Engineering Group	17 Mar 2016
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		NSW SHEQ Team	
2	Internal review - change of document format, contact detail updates	Internally Advised to Department of Planning and Environment	25 Feb 2019
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PURPOSE	<p>This Operational Environmental Management Plan (OEMP) has been prepared to satisfy the requirements of the Conditions of Development Consent (COC) and the Environment Protection Licence (EPL) issued for the Banksmeadow Transfer Terminal (BTT).</p> <p>The OEMP is the working environmental management tool for the operation of the BTT, concentrating on key environmental issues, including supporting detailed plans for the management of soil, water and leachate; waste; traffic; air quality; noise; landscaping and vegetation; and emergency response.</p>
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Scope	<p>This OEMP and the supplementary Environmental Management Plans (EMPs) have been prepared to provide the management measures to be implemented to minimise potential adverse impacts on the environment during the operational stage of the BTT.</p>
Review Frequency	<p>Yearly</p>

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Definitions/Abbreviations

See definitions in the [BMS Dictionary](#) - Only definitions directly pertaining to this document are included.

Term	Definition
AEMR	Annual Environmental Management Report
AQMP	Air Quality Management Plan
BMS	Business Management System
BTT	Banksmeadow Transfer Terminal
CCC	Community Consultative Committee
CLM	Contaminated Land and Management Act 1997
CTT	Clyde Transfer Terminal
COC	Conditions of Development Consent
DA	Development Application
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EP&A	Environmental Planning and Assessment Act 1979 (and Regulations)
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan
GHG	Greenhouse Gas Emissions
IMF	Crisps Creek Intermodal Facility
MBT	Woodlawn Mechanical Biological Treatment
NMP	Noise Management Plan
OEMP	Operational Environmental Management Plan
OMP	Odour Management Plan
PN	Pacific National
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations Act 1997 (and Regulations)

PPE	Personal Protective Equipment
RNMP	Noise Management Plan - Rail Operations
SCMP	Site Contamination Management Plan
SEIS	Supplementary Environmental Impact Statement
SHEQ	Safety Health Environment Quality
SMA	Sydney Metropolitan Area
SMP	Stormwater Management Plan
TPA	Tonnes per Annum
TMP	Traffic Management Plan
TNMP	Noise Management Plan - Terminal Operations
Veolia	Veolia Australia and New Zealand
VPCP	Vermin and Pest Control Plan
WARR	Waste Avoidance and Resource Recovery Act 2001
WHS	Work Health and Safety Act 2011 (and Regulation)
WMA	Water Management Act 2000
WMP	Waste Management Plan

1. Introduction

1.1. Overview

Veolia Australia and New Zealand (Veolia) operates the Banksmeadow Transfer Terminal (BTT), which is located at 14 Beauchamp Road and 34-36 McPherson Street, Banksmeadow (refer to the Site Layout Plan in Appendix A).

The BTT facility has been approved to receive up to 500,000 tonnes per annum (TPA) of waste (including 400,000 TPA of putrescible waste and 100,000 TPA of non putrescible waste) from within the Sydney Region. The waste will be containerised and loaded onto rail wagons for transportation by rail to the Woodlawn Eco Project Site (owned and operated by Veolia) in the Southern Tablelands (approximately 250 kilometres southwest of Sydney) for treatment, recycling and energy recovery.

The BTT includes the following infrastructure:

- An access road for waste trucks entering and exiting the facility from Beauchamp Road.
- Incoming and outgoing weighbridges to check the waste type and weight of the waste being delivered to the facility.
- An enclosed building for the unloading and handling of waste, with environmental controls such as dust suppression and odour control systems.
- A hardstand area for temporary storage and manoeuvring of full and empty sealed shipping containers prior to loading onto trains.
- Rail sidings for the loading of containers onto trains for rail transport to Woodlawn.

The NSW Department of Planning and Environment (DPE) assessed the State Significant development (SSD 5855) and granted Development Consent for the 'State Significant' development on 28 April 2015, in accordance with section 89 (e) of the Environmental Planning and Assessment Act 1979 (EP&A Act).

In August 2016, a modification was made to SSD 5855 (SSD 5855 MOD 1) for road upgrade works and was approved by the Department of Planning and Environment (DPE) in accordance with section 75W of the *Environmental Planning and Assessment Act 1979*.

In addition, an Environment Protection Licence (EPL) has been issued under the Protection of the Environment Operations Act 1997 (POEO Act) by the NSW Environment Protection Authority (EPA).

This Operational Environmental Management Plan (OEMP) has been prepared to satisfy the requirements of the Conditions of Development Consent (the Consent Conditions) and the EPL.

The OEMP is the working environmental management tool for the operation of the BTT, concentrating on key environmental issues, including supporting detailed plans for the management of water quality, waste, traffic, air quality, greenhouse gas, noise, landscape and vegetation and emergency response.

1.2. Scope and Objectives

The purpose of this OEMP is to provide an overview of the potential environmental impacts of the BTT during its operational phase and describe the management and mitigation measures to protect the environment on site and sensitive receivers off site.

The objectives of this OEMP are to:

- Provide an overview of the BTT operations (refer to the Site Layout Plan in Appendix A);

- Provide guidance on compliance with relevant environmental legislation, including the Conditions of Development Consent and relating to the operational phase of the BTT (refer to Regulatory Documents in Appendix B and the Operational Condition Compliance Report in Appendix C);
- Provide a means of implementing appropriate mitigation measures for the key environmental issues (refer supplementary Environment Management Plans in Appendix D);
- Provide a working environmental management tool to follow during the operation stage of the BTT;
- Define roles and responsibilities of the operational team;
- Provide a guide for the interaction with relevant government authorities and other relevant stakeholders, including the community during the operational phase of the BTT (refer Section 4.3); and
- Provide a basis for monitoring, reporting and maintaining compliance with both Veolia and regulatory requirements for the BTT (refer to [Environmental Monitoring Program- TEM-6582](#)).

This OEMP and supplementary Environmental Management Plans (EMPs) have been prepared to provide the management measures to be implemented to minimise potential adverse impacts on the environment during the operational stage of the BTT.

This OEMP is a live document. The management strategies and control measures detailed within it will be reviewed and updated, where necessary, to reflect changes introduced by the BTT operational team, site specific outcomes, non-conformances and recommendations arising out of inspections, meetings and audits.

1.3. Supporting Environmental Management Plans

A series of supporting management plans have been developed in support of this OEMP. These plans are provided as Appendix D to this OEMP and are as follows:

- [Soil, Water & Leachate Management Plan - MAN-6588](#) (refer Appendix D1)
- [Waste Management Plan - MAN-6587](#) (refer Appendix D2)
- [Traffic Management Plan - MAN-5175](#) (refer Appendix D3)
- [Air Quality Management Plan - MAN-6585](#) (refer Appendix D4)
- [Noise and Vibration Management Plan - MAN-6584](#) (refer Appendix D5)
- [Landscape and Vegetation Management Plan - MAN-6583](#) (refer Appendix D6)
- [Emergency Response Plan - MAN-5174](#) (refer Appendix D7)

2. Statutory and Policy Considerations

This section provides an overview of the environmental planning and statutory context for the operations of the BTT. It also provides a discussion of the BTT operations in the context of Veolia’s corporate environmental and sustainability policies.

Veolia is committed to complying with all of its legal obligations and other voluntary commitments made by the company. Compliance to applicable regulatory requirements concerning the operations of the BTT will be achieved through:

- identifying and accessing legal and other requirements which are directly applicable to the organisation;
- consulting and involving relevant government agencies;
- internally communicating relevant information regarding legal and other requirements;
- continually auditing, reviewing and upgrading company systems, management plans and supporting documentation; and
- providing relevant training.

2.1. Legal and Other Requirements

2.1.1. Acts and Regulations

This OEMP has been developed in the context of key NSW legislation detailed below. Detailed description of legislation relevant to the BTT operations is maintained by Veolia in the [NSW Compliance Register \(TEM-10143\)](#).

Table 2.1 Acts and Regulations

Legislation	Purpose	Application
<i>Protection of the Environment Operations Act, 1997, (POEO Act, 1997)</i>	<p>Environment protection and pollution reduction by regulating discharges to air, water and land, as well as preserving community amenities such as impacts from traffic, noise or odour emissions.</p> <p>Classifying offences and issue of notices, subject to the severity of the offence.</p> <p>The POEO Act aims to manage pollution and waste disposal in NSW. The NSW EPA administers it. Part 1 of Schedule 1 of the POEO Act defines premise based scheduled activities that require an</p>	<p>As an integrated development, the operation of the BTT requires licensing under the POEO Act 1997, as a Premises Based Scheduled Activity. The scheduled activity is termed “Waste storage, transfer, separating or processing, being waste facilities that store or transfer, or recover by way of separating or processing, any waste” and refers to sites that store, transfer, separate or process waste with a threshold level of “over 30,000 tonnes per year”.</p> <p>An EPL for the BTT has been issued by the EPA (refer to Appendix B) and is renewed annually on the anniversary date from 15 January 2004. The most current version of the licence can be viewed on the public register located on the EPA website.</p> <p>The BTT has been issued an EPL based on the scheduled activities detailed in Table 2.1.1 below.</p> <p style="text-align: center;">Table 2.1.1 Scheduled Activities under the POEO Act</p>

	<p>Environment Protection Licence (EPL).</p>	<table border="1"> <thead> <tr> <th data-bbox="767 168 906 248">Clause</th> <th data-bbox="906 168 1166 248">Activity</th> <th data-bbox="1166 168 1463 248">Trigger</th> </tr> </thead> <tbody> <tr> <td data-bbox="767 248 906 629">41</td> <td data-bbox="906 248 1166 629">Waste processing (non-thermal treatment)</td> <td data-bbox="1166 248 1463 629">Having on site at any time more than 1,000 tonnes, or 1,000 cubic metres, whichever is the lesser, of general waste Processing more than 6,000 tonnes per year, of general waste.</td> </tr> <tr> <td data-bbox="767 629 906 1093">42</td> <td data-bbox="906 629 1166 1093">Waste storage</td> <td data-bbox="1166 629 1463 1093">More than 1,000 tonnes or 1,000 cubic metres stored on the premises at any one time, of general waste. More than 6,000 tonnes of waste is received from offsite per year, of general waste.</td> </tr> </tbody> </table>	Clause	Activity	Trigger	41	Waste processing (non-thermal treatment)	Having on site at any time more than 1,000 tonnes, or 1,000 cubic metres, whichever is the lesser, of general waste Processing more than 6,000 tonnes per year, of general waste.	42	Waste storage	More than 1,000 tonnes or 1,000 cubic metres stored on the premises at any one time, of general waste. More than 6,000 tonnes of waste is received from offsite per year, of general waste.
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<p><i>Environmental Planning and Assessment Act 1979</i></p>	<p>Provide the framework for assessing environmental impacts and seeking planning approval of development proposals or activities by public authorities in NSW.</p>	<p>The NSW DPE assessed the BTT development as a State Significant development (SSD 5855) and granted Development Consent for the proposal on 28 April 2015 in accordance with section 89 (e) of the Environmental Planning and Assessment Act 1979 (EP&A Act). The Consent Conditions issued by DPE identify measures that are required to:</p> <ul style="list-style-type: none"> • prevent, minimise, and/or offset adverse environmental impacts including economic and social impacts; • set standards and performance measures for acceptable environmental performance; • require regular monitoring and reporting; and • provide for the ongoing environmental management of the development. 									
<p><i>Waste Avoidance and Resource Recovery Act (WARR Act) 2001 and its associated Regulation 2017 and amendment act 2016</i></p>	<p>Encourage the most efficient use of resources and to reduce environmental harm.</p> <p>Ensure that resource management options are considered in the following order;</p> <ul style="list-style-type: none"> • avoidance of unnecessary resource consumption; 	<p>The WARR Act is the principal piece of legislation governing waste and resource management in NSW. The Act seeks to maximise the utility of resources including waste, and minimise disposal of resources to landfill.</p> <p>The objectives of the WARR Act include:</p> <ul style="list-style-type: none"> • Encouraging the most efficient use of resources; • Reducing environmental harm; 									

	<ul style="list-style-type: none"> • resource recovery (including reuse, reprocessing, recycling and energy recovery); and • disposal. 	<ul style="list-style-type: none"> • Ensuring that resources are managed against the waste hierarchy of avoidance, resource recovery, and then disposal; • Diversion of waste from landfill; • Ensuring industry takes part in reducing and dealing with waste; and • Achieving integrated, state-wide waste and resource management planning and service delivery.
<p><i>Contaminated Land and Management Act 1997 (CLM Act)</i></p>	<p>Allows EPA to respond to contamination that is causing a significant risk of harm to human health or the environment, and sets out criteria for determining whether such a risk exists.</p>	<p>The principal object of the Contaminated Land Management Act 1997 (CLM Act) is to establish a process for investigating and, where appropriate, remediating land that the EPA considers to be contaminated significantly enough to require regulation. Under the CLM Act, contamination of land is defined as:</p> <p>‘the presence in, on or under the land of a substance at a concentration above the concentration at which the substance is normally present in, on or under (respectively) land in the same locality, being a presence that presents a risk of harm to human health or any other aspect of the environment’ (CLM Act, s5).</p> <p>Land may be considered contaminated even if it became contaminated partly, or entirely, by the migration of contaminants into, onto or under the land from other land.</p> <p>The BTT site is within the declared area of significant contamination known as the ‘Orica Botany’ site, shown in Figure 5-18. The contamination affecting the declared area constitutes elevated levels of various organic contaminants, including but not limited to volatile chlorinated hydrocarbons and semi-volatile chlorinated hydrocarbons (Declaration Number 21074; Area Number 3203, EPA 2005).</p> <p>Section 105 of the CLM Act provides for the preparation of guidelines by the EPA to guide the assessment of site contamination in NSW. A detailed site assessment has been undertaken in accordance with the EPA contaminated land assessment guidelines, and the findings concluded that the site would require remediation prior to operation as a waste transfer terminal. That remediation will be complete before commissioning and commencement of operations at the BTT.</p>
<p><i>Water Management Act (WMA) 2000</i></p>	<p>The WMA aims to facilitate the sustainable and efficient use of water in such a way that benefits</p>	<p>The WMA provides for the preparation of water management plans that outline arrangements for water sharing, water source protection and drainage management. The Proposal site is located within the</p>

	<p>the environment and communities.</p>	<p>area covered by the 2010 Metropolitan Water Plan (NOW, 2010), the key aims of which are to:</p> <ul style="list-style-type: none"> • Provide a secure supply of water to meet the medium-term needs of Sydney, while planning for long-term goals. • Protect the health of Sydney's rivers. • Ensure water supplies are adequate throughout drought. • The BTT has been designed to have a minimal impact on the quality and quantity of water discharged from the site, and to minimise the demand for potable water at the site. <p>The WMA also provides for the protection and sharing of groundwater through the development and implementation of water sharing plans. The BTT is subject to the Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011, which commenced July 2011. The site lies within the extent of the Botany Sands Groundwater Source, which is highly vulnerable to contamination due to the permeability of the sands and the generally shallow water table.</p> <p>Under section 91F of the WMA it is an offence to carry out an activity that would interfere with water within an aquifer, causing removal of water from the source or the movement of water from one part of an aquifer to another without an aquifer interference approval. Works for construction of the BTT, including excavations for foundations and removal of an existing USTs and UPSs, are likely to interfere with the aquifer and an aquifer interference approval would be required under the WMA.</p> <p>These requirements were addressed as part of securing approvals for construction of the BTT. It is not anticipated that the operational phase of the BTT would impact on any groundwater or aquifers in the area.</p>
<p><i>Roads Act 1993</i></p>	<p>Consent of the appropriate roads authority is required to:</p> <ul style="list-style-type: none"> • erect a structure or carry out a work in, on or over a public road, or • dig up or disturb the surface of a public road, or • remove or interfere with a structure, work or tree on a public road, or • pump water into a public road from any 	<p>The objects of the <i>Roads Act 1993</i> are to:</p> <ul style="list-style-type: none"> • Set out the access rights to public roads. • Establish procedures for opening and closing public roads. • Provide for the classification of roads. • Establish the Roads and Maritime Services (RMS) and confer functions associated with road works and maintenance to the RMS and other roads authorities. • Regulate the carrying out of various activities on public roads.

	<p>land adjoining the road, or</p> <ul style="list-style-type: none"> connect a road (whether public or private) to a classified road. <p>Approval to work in an unclassified road (other than a Crown Road) is not required by a public authority.</p>	
<p><i>Roads Transport (General) Act 2005</i></p>	<p>The Road Transport (General) Act 2005 (RTG Act) provides the means to impose vehicle mass limits to restrict or prohibit certain vehicles using roads, bridges or causeways with respect to classified roads, as defined by the Road Act (Section 28).</p> <p>Section 28 enables councils and RMS to restrict vehicles with a laden mass exceeding a specified maximum mass from using certain roads. Under the RTG Act, an individual who breaches the load limit restrictions enacted under section 28 is guilty of an offence.</p>	<p>Waste delivery vehicles accessing the BTT are not classified as restricted access vehicles (RAVs) as their maximum length is 12 metres and gross vehicle mass is 22.5 tonnes. Nevertheless, these vehicles would preferentially use routes approved for use by RAVs, unless the origin is within the local area. The BTT EIS (Hyder, 2014) identified the routes approved for RAVs to access the BTT site.</p>
<p><i>Work Health and Safety Act 2011</i></p>	<p>The main objective of the <i>Work Health and Safety Act 2011</i> (WHS Act) is to provide for a balanced and nationally consistent framework to secure the health and safety of workers and workplaces.</p> <p>The WHS Act requires that workers and other persons should be given the highest level of protection against harm to their health, safety and welfare from hazards and risks arising from work or from specified types of substances or plant as is reasonably practicable.</p>	<p>In line with the objectives of the WHS Act, Veolia has implemented an integrated management system (refer Section 2.2) to provide a consistent framework to manage the health and safety of its workers and workplaces, establish mechanism for consultation , reporting and resolving WHS issues, providing education and training and managing compliance, as reasonably practicable.</p>

2.1.2. Other Requirements (Licences and Permits)

The following environmental approvals are in place for the BTT (refer **Table 2.2**)

Table 2.2 Environmental Approvals

Description	Number
Conditions of Development Consent: The construction and operation of a waste transfer (issued by the Department of Planning and Environment)	SSD 5855
	SSD 5855 MOD 1
Environment Protection Licence (issued by Environment Protection Authority)	20581
Works Authorisation Deed (to be issued by Roads and Maritimes Services)	TBA

2.2. Management Systems

Veolia has committed to the highest possible levels of environmental and safety standards, auditing and reporting standards, in addition to compliance with legislative requirements. This has involved reviewing existing management systems and operations, developing policies and procedures on all aspects of our activities, established communications systems, gaining requisite accreditations and constantly reviewing our achievements. To meet these objectives, Veolia has developed and implemented management systems to assist in meeting the corporate objective of its operations through sustainable development and allow Veolia employees access to Veolia policies and processes.

The Business Management System (BMS) is the online document management system that houses Veolia policies, corporate and regional procedures, site work instructions and other documentation. BMS incorporates the following:

- Environment, health, safety and quality of work
- Ensures compliance with national and international standards
- Single document management system
- Used in management of risk

Veolia also has an online incident and audit management system for reporting and managing incidents, recording audit and regulator enforcement information. This customised system, Rivo, is designed to log all issues arising from:

- audits;
- workplace inspections;
- complaints;
- risk assessment/hazard identifications;
- debriefs;
- change notifications; or
- casual observations.

Veolia continually audits, reviews and upgrades company systems, management plans and supporting documentation to maintain business and best practice standards, as well as comply with relevant legislation. To achieve this, Veolia maintains a program for independent third-party certification/accreditation to the following standards:

Veolia has ISO 9001, AS 4801 and ISO14001 accreditation across all sites in the country. The system is consistent with the requirements of a number of relevant standards listed in **Table 2.3 below**.

Table 2.3 Certification

Description	Certificate Number
ISO 9001 Quality Management System	FS 603945
AS/NZS 4801 Work Health and Safety Management System	OHS 603946
ISO14001 Environmental Management System	EMS 603944

2.3. Environmental Policy

Veolia has developed a variety of company-wide policies in support of the sound management of its facilities. Veolia employees are required to commit to the implementation of these policies.

Veolia’s [Environment Policy \(POL-10\)](#) supports our commitment to the minimisation of emissions to land, air and water and the wise use of natural resources.

2.4. Operational Efficiency

Veolia is committed to the protection of our community and the environment through efficiency, research and innovation. The feasibility of implementing cost-effective energy conservation measures have been investigated at the BTT to minimise greenhouse gas (GHG) emissions. These include:

- Assessing and utilising efficient electricity devices such as:
 - **Variable frequency drive motor controls on the waste compactors:** the variable frequency drive system drives the compaction system delivering only the necessary hydraulic pressure to achieve the specified putrescible waste bale density.
 - **Light sensors for external lighting:** where practical, essential external lighting have been fitted with a light sensor, so that they only turn on as the sun sets and turn off as the sun rises.
- As lighting is being replaced, energy efficient lighting is installed to meet the product and performance specifications under best practice industry rating schemes
- Assessing the use of B20 biodiesel for diesel powered machinery which have been probed with a GHG emissions benefit of 246.9 grams per kilogram of t CO2-e (The Green Truck Partnership, 2011).

The operation of the BTT has been assessed to deliver a net benefit abatement potential of 52 percent of Scope 1 GHG emissions (87,984 t CO2-e) for each 400,000 tonnes of waste received at the facility.

3. Facility Overview

Located on 14 Beauchamp Road (owned by Asciano Services Pty Ltd) and 34-36 McPherson Street (owned by Keith Engineering Pty Ltd), Banksmeadow, the BTT is bound by:

- McPherson Street to the south;
- A freight rail line to the west;
- The Asciano Botany Site to the east; and
- Beauchamp Road to the south-east.

The BTT wraps around a construction and demolition recycling yard, Banksmeadow Recycling Centre, which faces McPherson Street. While the BTT facility falls within the City of Botany Bay Local Government Area (LGA), entry to the site is at the intersection between Beauchamp Road and Perry Street, located in the LGA of Randwick City Council.

The BTT is sited on land zone IN1 General Industrial, comprised of the following land titles:

- Keith Engineering owned;
 - Lot 1, Deposited Plan (DP) 435497;
 - Lots A and B, DP 366725;
- Asciano owned land:
 - Part Lot 2, DP 1006865

The Asciano owned portion of the BTT site was previously used for rolling stock storage and temporarily for container handling purposes whilst the Keith Engineering owned portion of the site had a variety of uses, including skip bin storage.

The nearest residential area to the BTT is located within the suburb of Hillsdale, approximately 250 m to the north-east.

3.1. Site Setting

Detailed below is a description of the site. Additional information can be found in the supplementary environmental management plans appended to this report and the BTT EIS (Hyder, 2014).

3.1.1. Soils and Hydrogeology

The soil of the BTT site is generally characterised as being highly disturbed to depths of at least 1 m, with the original soils having been removed or buried, which overlay either compacted mottled clay or transported fills. The disturbed nature of the soil is reflective of the history of industrial uses and development that has occurred in the area.

The water table at the site was observed to occur at variable depths across the site, ranging from 1.71 m BGL and greater than 5.14 m BGL. The site is located within the Botany Sands Aquifer and the 'Botany Sands Aquifer Interference zone'. It is noted that groundwater levels within the Botany Sands Aquifer have been observed to range by up to 2 m.

The site is sealed with hardstand, preventing disturbance to the soils and underlying groundwater.

Further details of soil and groundwater management are contained in the Soil, Water and Leachate Management Plan (SWLMP) provided in **Appendix D1**.

3.1.2. Flooding and Drainage

The BTT site is located within the Botany Bay catchment area. The high level of urbanisation within the catchment has resulted in large areas of impervious surfaces, connecting them directly to waterways via stormwater infrastructure. Accordingly, the Botany Bay catchment generates approximately 292,435 megalitres (ML) of stormwater runoff each year.

The Botany Bay catchment comprises several sub-catchments, being:

- The Cooks River: located to the north of Botany Bay
- Georges River: located to the west, south and north of the Botany Bay catchment. Woronora River: located to the south-east of the Botany Bay catchment and draining to Georges River, before flowing to Botany Bay.
- Botany Foreshore: draining directly to Botany Bay. On the northern side of Botany Bay the catchment is drained by several sub-catchments, comprising Springvale Drain, Floodvale Drain and Foreshore Beach Drains.

The BTT site sits within the Springvale Drain catchment, which covers an area of 241 hectares (ha) and is said to have little to no riparian vegetation and being in a moderate or degraded condition.

BTT discharges to the stormwater drain on McPherson Street, which flows to the main Springvale Drain and ultimately discharges at Penrhyn Estuary.

Further details of stormwater management are contained in the SWLMP (Appendix D1).

3.2. Facility Description

The BTT consists of a waste transfer building, and associated road and rail infrastructure, including:

An access road for waste trucks entering and exiting the facility from Beauchamp Road.

- Incoming and outgoing weighbridges to check the waste type and weight of the waste being delivered to the facility.
- An enclosed building for the unloading and handling of waste, with environmental controls such as dust suppression and odour control systems.
- A hardstand area for temporary storage and manoeuvring of full and empty sealed shipping containers prior to loading onto trains.
- Rail sidings for the loading of fully sealed containers onto trains for rail transport to Woodlawn.

A Site Layout Plan is provided in **Appendix A**.

3.2.1. Access Road and Parkings

The BTT has two vehicular accesses, via the existing traffic lights at Beauchamp Rd and Perry St, and via McPherson Street.

The McPherson Street entrance is used for light vehicle access and parking. Twenty three car parking spaces are available adjacent to the McPherson Street site entrance, along the eastern wall of the Terminal Building, and to the south of the rail sidings.

3.2.2. Weighbridge Office and Weighbridge

Incoming waste vehicles access is via Beauchamp Road the entrance. Vehicles are weighed over the incoming weighbridge and weighed again upon leaving the site, via the outgoing weighbridge. This entrance includes a temporary truck parking area prior to the incoming weighbridge.

Additionally, the double weighbridge for incoming and outgoing waste trucks along the internal access road from the Beauchamp Road entrance incorporates an office for the weighbridge operators.

3.2.3. Terminal Building

The terminal building consists of a steel portal frame construction with steel cladding and concrete slab floor. The building is fully enclosed, with the exception of vehicle access openings and an air extraction system, which has a single point of exhaust.

The building comprises:

- Concrete slab flooring and upturned concrete walls to allow stockpiling of material;
- A dust suppression system;
- A single vehicular access;
- Odour control system; and
- Two compactors on the western side of the building.

3.2.4. Office and Amenities

The main office building is located at the front of the terminal building, adjacent to the McPherson Street entrance.

The amenities block for drivers is located centrally to the site, adjacent to the point where the inbound trucks access prior to the incoming weighbridge.

3.2.5. Container Storage

A container handling and storage area is established in the north-western corner of the site. The area comprises a concrete hardstand area of approximately 0.55 ha for the storage and handling of empty and full containers.

3.2.6. Maintenance Area and Chemical Storage

A maintenance area is located to the north of the terminal building.

The 12,000 L diesel storage tank is located west of the site

All fuels or flammable solvents for operational use will be stored in an appropriately ventilated and secure store in accordance with the DA and EPL requirements. Veolia's procedure Chemical and Hazardous Materials Management (PRO-COL-000-038) provides guidance on storage of such substances on Veolia sites. All flammable liquids will be stored within a bund of 110% capacity of the volume of those flammable liquids so that

any release of raw or burning fuel does not cause a fire or impact on surface water. A Hazardous Substances and Dangerous Goods Register will be developed to record such chemicals used at the BTT.

3.2.7. Public Utilities

High voltage underground cables (132 and 33 kV) exist on site between the Keith Engineering and Asciano sites. Veolia has constructed a hardstand over the cables to ensure no damage to the cables can occur. In the event of any infrastructure failure, Veolia has placed protection conduits to mitigate any disruption to power supply or waste operations for service requirements.

An asset protection deed with Ausgrid provides details on how to implement long term management of the cables.

3.2.8. Rail Sidings

The facility utilises three rail sidings located on the north-western side of the site, which are approximately 400 metres long and have a capacity to load up to 53 wagons in total. There is a concrete hardstand area in between two of the sidings to allow manoeuvring of container handlers. This area allows loading of up to 43 wagons. The area between the sidings and the terminal building is concrete hardstand to allow for container handling activities including temporary container storage. Man proof fencing is installed on the boundary between the site and the main rail corridor.

3.3. Operations Overview

The BTT's operational hours are 24 hours per day, 7 days per week.

The BTT is licensed under EPL No 20581 to accept:

- 400,000 TPA of General Solid Waste (Putrescible)
- 100,000 TPA of General Solid Waste (Non-Putrescible)

The EPL permits waste processing (non thermal treatment) and waste storage activities at the facility.

The operation of the BTT includes receipt of solid waste from municipal, commercial and industrial sources with the Sydney Metropolitan Area (SMA) as follows:

- Waste is accepted, weighed and unloaded on the tipping floor of the transfer terminal building, where it is screening for conforming waste in accordance with the EPL.
- The waste is then pushed by front end loaders into compactors via a chute to form a 'slug' of compacted waste and into a modified 40 foot shipping container with the use of a hydraulic ram.
- Filled shipping containers are loaded daily onto train wagons for transport via rail to the Crisps Creek Intermodal Facility (IMF), approximately 250 kilometres southwest of Sydney, in the Southern Tablelands.

Other activities related to, but not operated as part of the BTT included:

- Unloading of containers at the IMF and transporting them by road on quad axle trailers to the Woodlawn Eco Project Site (the Eco Project Site), approximately 8 km from the township of Tarago for either disposal in the landfill or for processing as compost; and
- Loading of empty containers back onto the train to return to the BTT for reloading.

3.3.1. Related Operations

Veolia owns and operates the Eco Precinct, which consists of two properties on approximately 6,000 hectares (ha) of land, namely Woodlawn and Pylara. The site includes the area of the Special (Crown & Private Lands) Lease 20 (SML 20), encompassing the Woodlawn Mine, a former lead, copper and zinc mine which ceased mining operations in 1998.

3.3.1.1. Woodlawn Bioreactor

The first stage of the Eco Precinct developed by Veolia was the Woodlawn Bioreactor (the Bioreactor), which commenced operations in September 2004 and is located in the void of the former Woodlawn Mine.

The Bioreactor has considerable capacity to receive putrescible waste generated from both Sydney and surrounding areas of regional NSW. Veolia lodged a modification application to remove the arbitrary annual waste input limits into the Bioreactor in response to the Wright Corporate Strategies' Public Review – Landfill Capacity and Demand (the Wright Review, 2009). The Wright Review was an independent review commissioned by the Minister for Planning to examine critical issues such as the continuing need for putrescible waste landfill capacity, regional disposal capacity and demand.

On 16 March 2012, the Department of Planning and Environment (DPIE) granted approval for the Bioreactor to increase its annual maximum input rate from 500,000 TPA to 1,130,000 TPA, referred to herein as the expanded operations. In order to facilitate the expansion of the Eco Project through the increased waste receipt capability of the Bioreactor, Veolia constructed the additional waste transfer station and associated rail infrastructure at the Banksmeadow Transfer Station.

Waste is deposited in the Bioreactor and with the use of optimal moisture and temperature conditions, achieves enhanced degradation to produce landfill gas and is collected through a vast network of infrastructure within the void. This gas is transferred to the Woodlawn Bioenergy Power Station, where methane is extracted from the landfill gas for conversion and supply as electricity into the energy grid.

3.3.1.2. Crisps Creek Intermodal Facility

The IMF, which forms an integral part of the logistical operations of the Eco Precinct, is located 8km from the Bioreactor in the township of Tarago, adjacent to the Goulburn-Bombala Railway line. Waste containers transported from the Sydney region via rail are unloaded and transferred onto road trailers at the IMF for transport to the Bioreactor. The IMF was approved to accept 1,180,000 TPA from Sydney when the Bioreactor was granted expanded operations.

3.3.1.3. Woodlawn Mechanical Biological Treatment Facility

The Woodlawn Mechanical Biological Treatment (MBT) Facility (approved in 2007) is located on the Eco Precinct Site. The MBT is approved to receive up to 280,000 TPA, 240,000 of which is mixed waste and 40,000 TPA of garden waste from within the Sydney Metropolitan Area. Containerised waste is loaded onto rail wagons from Sydney for transportation to the Woodlawn Eco Precinct.

3.3.1.4. Clyde Transfer Terminal

A similar facility to the BTT is operated by Veolia at the Clyde Transfer Terminal in Auburn. This receives up to 600,000 TPA of putrescible waste from within the SMA. This facility has been operational since 2004.

3.4. Operational Environmental Impacts

The following key environmental parameters were considered to be potentially impacted by the operation of the BTT:

- **Waste management and reduction:** Consideration of resource recovery targets under the WARR and how the BTT supports the Woodlawn MBT.
- **Traffic, transport and access:** Consideration of existing traffic on the surrounding road network, consideration of existing and future traffic from port related development and local development proposals. Identification of road upgrade requirements and mechanisms for funding.
- **Rail access:** Details of connection and access requirements to the Botany Goods line.
- **Noise:** Noise impacts of the BTT on residential and adjacent industrial receivers.
- **Air quality and odour:** Odour impacts on surrounding area and measures to mitigate.
- **Stormwater and flooding:** Consideration of existing flood studies undertaken by Botany City Council and impacts of the development on flooding. Control of stormwater leaving site and prevention of stormwater from entering ARTC land.
- **Contamination:** Assessment of site contamination on site and identification of USTs present on site. Development of remedial strategies.
- **Hazards and risk:** Determine hazardous materials with existing structures and identification of hazardous substances to be used or transported to site.

The environmental risk assessment of the parameters above took into account of the following:

- The planning and legislative requirements affecting the BTT;
- The environmental context of the BTT area and the region;
- The outcomes of the community and stakeholder consultation;
- A review of previous investigations undertaken for the BTT site;
- Existing operational and management plans used by Veolia; and
- The findings of the specialist environmental studies undertaken for EA.

3.4.1. Environmental Risk Assessment

On the basis of the environmental parameters considered above and the operational activities at the BTT, the outcomes of a number of environmental assessments undertaken have provided the following preliminary risk ranking i.e. without the implementation of suitable controls as per the **Table 3.1** below.

Table 3.1 Potential Environmental Impacts

Issue	Potential Impacts	Comment	Preliminary Risk Ranking	Key Issue? (Y/N)
Land use	Site incompatible with surrounding land uses	Site is located within an existing industrial precinct and is zoned 'IN1 – General Industrial' under the SEPP (Port Botany).	Low	N - Not likely to impact; no supplementary plans required
Soils and Contamination	Site contamination and risk of human and environmental health risks from exposure.	The BTT site is located within the area of an Approved Voluntary Management Proposal (20101714) and Declaration of Remediation Site (21074) and therefore must address SEPP 55.	Very high	Y - Yes. Refer section 3.4.1.2 and the Soil, Water and Leachate

	Disturbance of potential acid sulphate soils (PASS) causing environmental harm	The Banksmeadow TT site is mapped as a low probability of occurrence of PASS (NSW NRAtlas, 2013); however PASS is known to occur within the area. Should any further excavation works be required at the facility, which may encounter contaminated soil, the Construction Site Contamination Management Plan will be triggered.	Moderate	Management Plan
	Discharge of contaminated groundwater from the Site.	The Banksmeadow TT site is located within the Botany Sands aquifer Groundwater Extraction Exclusion Area, due to the high likelihood of groundwater contamination due to previous activities on adjoining sites. Should any further excavation works be required at the facility, which may encounter contaminated groundwater, the Construction Site Contamination Management Plan will be triggered.	Very high	
Hydrology and flooding	Alterations to hydrology on-site and discharge levels from Site, resulting in increased flood levels downstream.	The BTT increase the impervious surfaces on site and consequently an increase in the stormwater runoff generated at the site. This has the potential to cause flooding downstream of the site.	High	Y - Yes. Refer section 3.4.1.2 and the Soil, Water and Leachate Management Plan
	Release of leachate from putrescible waste to stormwater causing pollution of surface water.	Putrescible waste handled at the site has the potential to generate leachate which, if not contained, has the potential to reach surface or groundwater and cause pollution.	High	
	Flood impacts on-site from Springvale drain.	Modelling undertaken by the City of Botany Bay Council identified the potential for portions of the site to be flood affected.	High	
Traffic and access	Increased traffic volumes and frequency, including heavy vehicles, placing pressure on intersection and road capacities within the vicinity of the Site.	The facility will be open to receive waste 24 hours a day, seven days a week. Vehicle types accessing the Site will include heavy vehicles up to, and including, semi-trailers (19.0m). Access to the site will require a right hand turn from Beauchamp Road for the 20% of vehicles that would access the site from the north.	High	Y - Refer section 3.4.1.4 and the Traffic Management Plan
	Reduction in road safety as a result of	The BTT increases the number of trucks accessing the site from Beauchamp	Moderate	

	increased number of heavy vehicles operating on the road networks around the Banksmeadow TT site.	Road and McPherson Street. The size and mass of trucks means that they have greater potential to cause a serious road accident than light vehicles.		
	Accidents occurring on-site as a result of light and heavy vehicles, trains, container handlers and machinery operating within close proximity.	The operation of numerous vehicles on the site, including trains, trucks, front-end loaders and container handlers, has the potential to result in a collision if not appropriately managed.	Very high	
	Operation of rail link not accommodated within ARTC's network.	Train path availability within the ARTC rail network is needed to accommodate the BTT operations. Design or operation of the proposal is not consistent with ARTC operating standards.	High	
Waste Management	Disruption to operations	Unplanned disruption to terminal operations resulting in large quantities of waste being stored on site.	Very high	Y - Refer section 3.4.1.2 and the Waste Management Plan
	Release of leachate to stormwater	Failure to separate leachate generated on the site from stormwater, resulting in environmental harm.	High	
	Receipt of non-conforming wastes at the site.	Waste which the EPL for the facility does not permit to be handled at the site brought to the site.	Moderate	
Noise and vibration	Noise impacts on adjacent receivers from site operations.	Operational noise and vibration in relation to loading, unloading and dropping of containers, as well as from reversing vehicles and deposition of waste on the transfer terminal floor.	Moderate	Y - Refer section 3.4.2.5 and the Noise and Vibration Management Plan.
	Noise impacts on adjacent receivers from trucks and trains accessing the site.	Increased noise from rail and vehicular traffic going to and from the site.	Moderate	
Air Quality	Odour emissions from putrescible waste	The handling of large quantities of waste at the facility has potential to result in the emission of odour if not properly managed.	Moderate	Y - Refer section 3.4.2.4 and the Air Quality Management Plan

	Air pollutants emitted from vehicles and trains accessing the site and machinery operating on-site	The operation of numerous vehicles on the site, including trains, trucks, front-end loaders and container handlers, has the potential to result in dust and pollutants reducing ambient air quality if not properly managed.	Moderate	
Greenhouse Gas Assessment	Release of greenhouse gas emissions.	Greenhouse Gas (GHG) emissions will be released as a result of the operation of the BTT, including waste management operations (handling and transportation of waste).	Medium	Y - Refer section 2.4
	Overall reduction in GHG emissions	The proposal would result in the transfer of waste to the Woodlawn Eco-Project site that comprises the MBT and Bioreactor, which have both been designed to minimise GHG emissions from decomposition of waste.	Low (net benefit)	
Biodiversity	Reduced biodiversity as a result of the operations.	The site supports low biodiversity values. No threatened species, populations or communities have been identified, and there are limited habitat values on-site.	Low	N - Supplementary management plans not required
Indigenous Heritage	Negative impact on Indigenous heritage within the area.	A search of the EPBC Protected Matters search tool and the AHIMS NSW register found no items of Indigenous Significance within a 5 km radius of the site.	Low	N - Not detected, therefore supplementary management plan not required
Non-Indigenous Heritage	Negative impact on non-indigenous heritage within the area.	A search of the National heritage Register and the NSW register found no items of Non-Indigenous significance within the vicinity of site. The SEPP (Port Botany) identified the 'Main Administration Building – "Orica" and Mature Ficus' as heritage items, located within 200m of the site.	Low	N - supplementary management plans not required

Socio-economic	Potential for negative social impacts in relation to increased traffic, noise, and air pollution (including odour), as well as decreased visual amenity	The site is located within an Industrial precinct within a low population density area. Nearest residential area located approximately 250 m to the north-east of the site.	Low	N - Not likely to impact, therefore supplementary management plan not required
	Changes to local demographic and local economic impacts	The operation is expected to create up to 25 new jobs, providing economic benefits for the area.	Low (net benefit)	
	Regional economic impacts	The operation will provide significant regional benefits, aiding in reduced waste transferred to landfill and increased industrial resource reuse and provision of a cost-effective waste management alternative, increasing competition and reducing costs, indirectly benefiting SSROC and thereby their communities.	Low (net benefit)	
Visual Impact	Decreased amenity of the area.	The site is located within an existing industrial area, with adjoining land uses of this nature. The main shed will be built at a higher elevation than the existing structure, but would be compatible with adjacent land uses.	Low	N - Refer to section 3.4.2.6
Hazard and Risk	Occurrence of hazards or risks onsite	Potential risks associated with the operation include; chemical or pollutant spills, hazardous or dangerous goods, fire/explosion within terminal building, receipt of hot loads and medical emergencies.	High	Y - Refer to Section 4.4
Cumulative Impacts	Cumulative impacts associated with increased traffic volumes from surrounding developments.	The site is located on a main arterial road, heavily used by port traffic. Trucks accessing the site would add to existing impacts of high traffic volumes and its associated consequences.	Moderate	Y - Refer to Appendix D for supplementary environmental management plans
	Flood risk from increased stormwater runoff associated with increased impervious areas associated with development.	The site is located in a highly disturbed catchment with large areas of impervious surfaces. Further impervious surfaces will continue to exacerbate catchment runoff problems.	Moderate	

3.4.2. Key Environmental Issues

The following key environmental issues, identified via the risk assessment, were modelled to obtain predicted impacts. These have been addressed in supplementary Environmental Management Plans (EMPs) appended to this OEMP (refer **Appendix D**). These management plans include identified mitigation measures.

3.4.2.1. Soil, Water and Leachate

The principal potential soil and water quality impacts associated with operations of the BTT would arise from:

- Accidental spills or leaks within the BTT site, which have the potential to result in contaminants being transported into the surrounding environment including soil and groundwater;
- Alterations to hydrology on-site, flood storage capacity and discharge levels from BTT may result in increased flood levels downstream.
- Accidental release of leachate from the leachate storage tank;
- Release of leachate from putrescible waste to stormwater may cause pollution of surface water

3.4.2.2. Waste

The principal potential waste quality impacts associated with operations of the BTT would arise from:

- Achievement of resource recovery targets under the Waste Avoidance and Resource Recovery Act;
- Handling large quantities of waste with potential to generate odour;
- Disruption to waste operations and waste storage on site;
- Release of leachate from putrescible waste to stormwater may cause pollution of surface water;
- Receipt of non conforming waste in contravene with its EPL.

3.4.2.3. Traffic

- A number key of issues for traffic management at the BTT have been identified. These include:
- Increased traffic volumes and frequency, including heavy vehicles, placing pressure on intersection and road capacities within the vicinity of the Site
- Reduction in road safety as a result of increased number of heavy vehicles operating on the road networks around the BTT
- Accidents occurring on-site as a result of light and heavy vehicles, trains, container handlers and machinery operating within close proximity
- Rail access to and from the site via external rail networks.

3.4.2.4. Air Quality

Dust and odour are the principal potential air quality impacts associated with operations of the BTT. These arise due to:

- Dust emissions: handling of waste within the transfer terminal building.
- Odour emissions: putrescible waste handled at the facility on residential receivers.

Odour and dust emissions are controlled within the BTT transfer terminal building through the operation of an exhaust stack and ventilation system, along with a dust suppression system.

3.4.2.5. Noise and Vibration

The results of a noise assessment undertaken as part of the BTT EIS (Hyder 2014) indicated that operational noise emissions from the BTT would fully comply with the relevant INP power sound noise level at all identified

sensitive receivers during worst-case, maximum operating conditions. Full compliance was predicted under both neutral and prevailing adverse meteorological conditions.

The assessment concluded that given the existing background noise levels experienced by the closest residential receivers to the BTT, operational activities would be expected to be rendered inaudible at these localities.

Vibration impacts during operation were also considered to be negligible and unlikely to have any potential impact on sensitive receivers.

3.4.2.6. Flora and Fauna

A comprehensive ecological survey was undertaken for BTT, incorporating the site, access road and areas adjacent to the access road (EIS, Hyder 2014).

No threatened flora or fauna species, endangered flora populations or endangered ecological communities were recorded in the study area during the survey period, therefore no significant impact potentially occurring threatened species for important habitat.

Design considerations and landscaping treatment measures and control measures to minimise impacts on biodiversity are provided in the appended Landscaping and Vegetation Management Plan.

3.4.2.7. Vermin and Pests

The previous land uses on the BTT site (storage and small scale commercial industrial operations) are not likely to have attracted large numbers of vermin and pests. However, there is habitat on-site for vermin and pests, within buildings and storage areas as well as in the areas of exotic vegetation.

Common invertebrate pests that could potentially occur on-site include cockroaches, spiders, mosquitoes, ants and flies.

4. Implementation of the OEMP

This section addresses the requirements of Section 2 – (f),(g) & (h) of Schedule 4 of the Development Consent.

4.1. Structure, Roles and Responsibility

Staffing of the BTT is as follows:

- Weighbridge Operators (day and night shifts);
- 2 x Leading Hand;
- 7 x Forklift/Compactor operators;
- 1 x Facility Manager

Additional staff involved with the operation of the BTT includes:

- Sydney Operations Manager;
- Plant Maintenance Supervisor;
- Monitoring Personnel;
- Environmental Advisor;
- SHQ Representative

A summary of the authorities and environmental responsibilities of key personnel for the operation of the BTT is provided below, followed by an organisational chart.

4.1.1. Facility Manager

- Approve and implement the OEMP;
- Report to senior management on the performance of the system and environmental issues/breaches etc;
- Allocate project resources to handle environmental issues;
- Take action to resolve major non-conformances;
- Ensure suppliers and subcontractors comply with requirements; and
- Ensure that site personnel receive appropriate environmental awareness training, in consultation with the Environmental Advisor.

4.1.2. Environmental Advisor

- Report to the Facility Manager on the performance of the system and improvement opportunities;
- Provide support to the site to ensure they are aware of their environmental obligations and enable them to meet their environmental commitments;
- Ensure that non-conformances and non-compliances are recorded and actioned;
- Prepare the Annual Environmental Management Report;
- Review and update the OEMP and associated documentation;
- Ensure that environmental records and files are maintained;
- Provide support to the site to ensure they are aware of their environmental obligations and enable them to meet their environmental commitments; and
- Ensure that non-conformances are recorded and actioned;
- Undertake environmental monitoring requirements of the licence;
- Ensure environmental monitoring data accurately reported;
- Assisting with environmental performance reporting requirements;

4.1.3. Contractors

As part of vendor setup, contractors are directed to:

- Comply with legal and contractual requirements as instructed by Veolia.
- Comply with BTT management / supervisory directions.
- Participate in site induction and training as directed.
- Report hazards and incidents to BTT staff.

4.1.4. All Personnel

- Comply with the relevant Acts, Regulations and Standards.
- Comply with Veolia Environment Policy, environmental management standards and procedures.
- Comply with and implement the requirements of this OEMP
- Promptly report to management on any non-conformances and/or breaches of the system.
- Undergo induction and training in environmental awareness as directed by management.

Figure 4.1 indicates the staffing and organisational structure for the operation of the BTT, which will be amended from time to time as required.

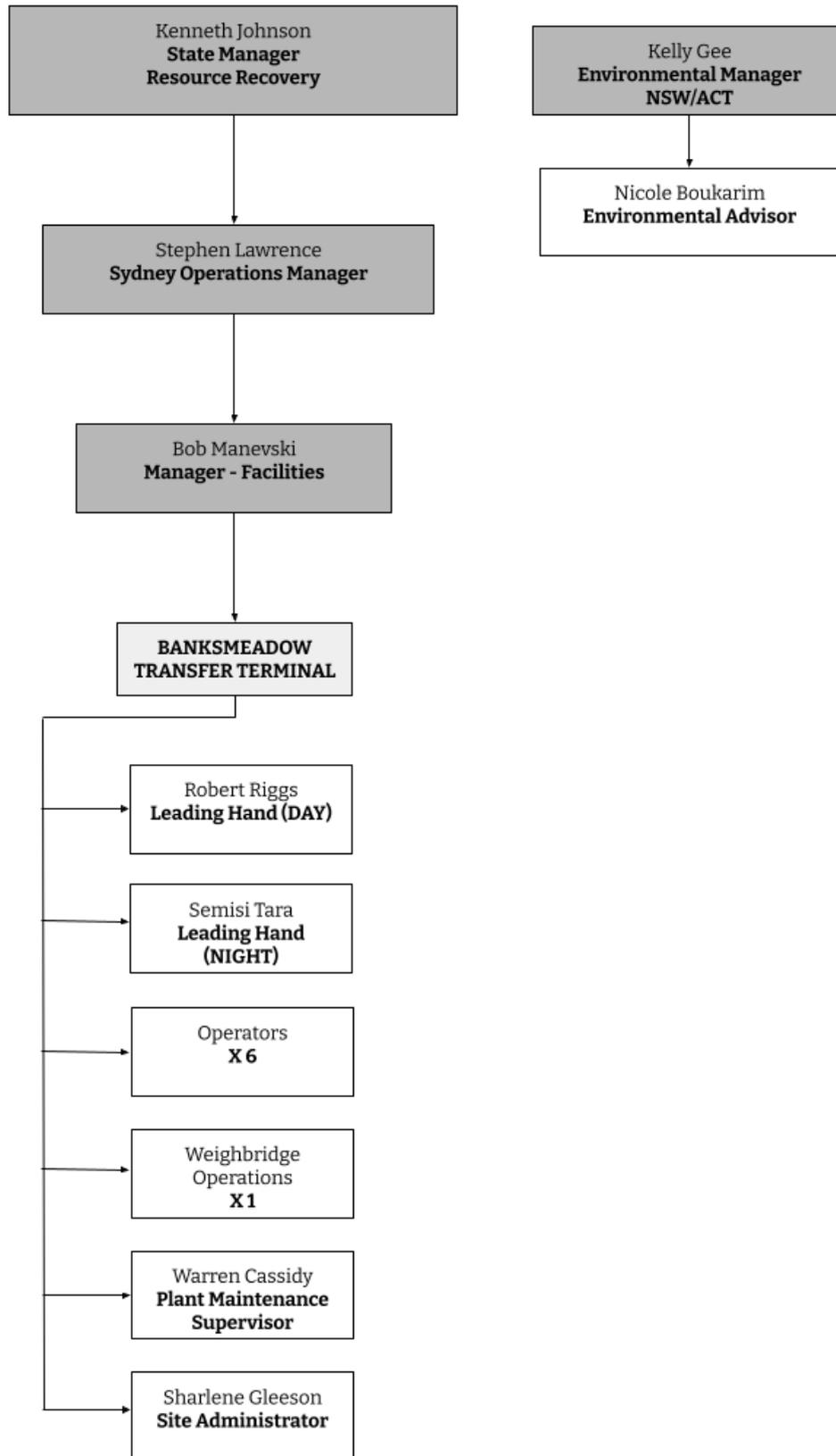


Figure 4.1 BTT Organisational Chart

4.2. Training

A training matrix has been developed for the BTT, based on Veolia's Training and Development Standard, which requires corporate/site specific inductions, competency based training requirements for operators, as well as administrative, risk and emergency response training.

An overview of the type of training undertaken at BTT is provided below:

4.2.1. General Induction

All employees receive a corporate induction which provides an awareness of Veolia's commitment to the environment and sustainability. Components of Veolia's general induction program are as follows:

- Veolia corporate induction via LMS online modules;
- Safety, health, environment and quality induction

As relevant, operational employees receive site specific inductions, including suitable environmental training, to ensure they are aware of their responsibilities and are competent to carry out their work as per the next section.

4.2.2. Site Training

Site specific inductions are a requirement for all site personnel, contractors and visitors.

4.2.2.1. Employees

In addition to the general induction, all employees receive site specific training covering the following:

- OEMP and related documents;
- Site environmental objectives and targets;
- Understanding individual authorities and responsibilities;
- Significant project aspects, impacts and controls;
- Potential consequences of departure from procedures;
- Emergency procedure and response; and
- Understanding the legal obligations.

All staff are to be reassessed twice within the first year to ensure they maintain the required level of training, including compliance with relevant procedures.

4.2.2.2. Contractors

In addition to vendor set up, contractors receive site specific training covering the following as well:

- Contractors are made aware of the environmental obligations for the BTT and the key aspects and impacts
- It is a requirement of Contractors to report hazards or incidents they become aware of on site
- BTT site personnel verify Contractor risk assessments to ensure appropriate controls are implemented
- A permit to work system operators to ensure any high risk work is appropriately controlled
- Emergency procedure and response and responsibility to report environmental incidents; and
- Significant project aspects, impacts and controls on the project they are working on

4.2.2.3. Drivers

A compulsory site induction has been established for the customers on how to induct their drivers accessing the site. The driver induction includes but is not limited to the following conditions of entry:

- Left turn entry and exit from Parramatta Road;
- All Waste Drivers reporting to weighbridge personnel;
- Use of Personal Protective Equipment (PPE's);
- Visitor restrictions;
- No smoking on site except in designated areas;
- Obeying traffic signs;
- On-Site machinery has right of way;
- Following instructions from site staff;
- Reporting to Hot Load zone upon arrival if carrying a Hot Load and contacting staff;
- Ensuring tailgate is clean and any loose material removed before exiting the waste shed;
- Reporting incidents, injuries and spills;
- Punitive action for non-compliance with conditions of entry;

Following this training program all drivers are required to undertake a questionnaire as proof of induction and to ensure competency.

4.3. Communications and Consultations

Veolia is committed to meaningful stakeholder engagement and has worked in collaboration with relevant government agencies and the local community in the Botany and Randwick LGAs to resolve issues that result from operations at the BTT.

Internal communication methods include the following, as applicable:

- Monthly toolbox meetings;
- Annual risk management audit reports;
- Non-conformance reports
- Noticeboards;
- Employee induction and training, refer to **Section 4.2**.

External communication methods and their respective time frames include the following, as applicable:

- Annual regulatory reports
- Annual public notices and announcements
- Meetings and correspondence with appropriate regulatory authorities, as required
- Correspondence with adjoining landowners / neighbours, as required
- Prompt response to complaints

4.3.1. Government Bodies

The following government bodies will be consulted in relation to the operations of the BTT and the requirements of this OEMP:

- NSW Department of Planning and Environment;
- NSW Environment Protection Authority;
- NSW Roads and Maritime Services;
- Australian Rail Track Corporation (ARTC);
- Transport for NSW;

- City of Botany Bay Council;
- Randwick City Council; and
- NSW Office of Water.

4.3.2. Community Consultation

During construction, Veolia kept the local community informed of the progress of the project in a pro-active and responsive manner. Veolia's communications included:

- public notices and announcements;
- meetings and correspondence with appropriate regulatory authorities; and
- discussions with adjoining land owners / neighbours who may be affected by the BTT.

The key objectives of the community engagement during operations includes:

- Educating stakeholders regarding key aspects of BTT operations; and
- Engaging community groups and neighbours to help Veolia understand concerns re site operations.
- Community consultation activities for the BTT during operations include:
- A dedicated Veolia webpage, offering general information on the BTT (refer **section 4.3.3**);
- A community telephone line and email address to provide a central point of contact for community enquiries (refer **section 4.3.3**);

4.3.3. Information Availability

The following information about the BTT is available through to web links indicated:

- Dedicated Veolia webpage:
 - <https://www.veolia.com/anz/about/our-facilities/transfer-stations/banksmeadow-transfer-terminal-nsw>
- Community telephone line:
 - BTT 24 hour feedback line: 1800 298 981
- Dedicated email address:
 - banksmeadow@veolia.com.au
- Published Reports:
<https://www.veolia.com/anz/about/our-facilities/transfer-stations/banksmeadow-transfer-terminal-nsw>
- Published Monitoring Data:
<https://www.veolia.com/anz/about/about-veolia/operational-compliance/nsw-monitoring-reports>

In accordance with the COCs, the following information is made available, and kept up to date, on the BTT webpage:

- the BTT EIS;
- current statutory approvals for the development;
- approved strategies, environmental management plans or programs;
- a summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent;
- a complaints register, updated on a quarterly basis;
- copies of any annual reviews (over the last 5 years);
- any independent environmental audit and Veolia's response to the recommendations in any audit; and
- any other matter required by the DPE.

4.3.4. Complaints Handling Procedure

Records of all complaints are kept for at least four years after the complaint was made.

Receiving public comments from the impacted community is possible through the 24-hour operated weighbridge office telephone number listed above. The Facility Manager and/or Environmental Advisor are notified of all public complaints. All public complaints received (either written or verbal) are documented in the online Complaints Register which contains the following information:

- the nature and extent of the complaint;
- the details of the person lodging the complaint;
- details of location, date, time and effects of the complaint;
- the action taken to address the complaint including follow up contact with the complainant.

The Register is kept updated to ensure any complaints are correctly recorded and addressed.

4.3.5. Complaints Management

An initial response is provided to the complainant by the next working day following the date of the complaint, where possible. The corrective action may involve supplementary monitoring to identify the source of the non-conformance, and/or may involve modification of operational techniques to avoid any recurrence or minimise its adverse effects.

The Facility Manager or Environmental Advisor investigates and determines appropriate corrective/preventive actions to be taken to address all complaints. The complainant is informed in writing of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken the reasons why are recorded. The Facility Manager or Environmental Advisor will make available a report on complaints to the community and relevant government agencies upon request.

4.4. Incident and Emergency Response

A key objective of this OEMP is to identify potential risks, and to develop, and maintain measures to manage them. Notwithstanding this, Veolia recognises that unforeseen incidents can arise.

Veolia operates under an Emergency Response Plan whenever a major incident, emergency or crisis could lead to public health, safety or environmental issues.

Veolia's approach to incident and emergency response management includes:

- Risk Analysis - The identification of hazards and risks that could impact the community, environmental and operational implications.
- Prevention – The planning and documentation of prevention and mitigation activities for all major hazards, and allocation of responsibility for their implementation.
- Preparedness – The development, implementation and review of specific incident management plans and processes to manage identified risks, the training of staff, and establishment of facilities to ensure the company can respond effectively to an incident.
- Response – The issue of warnings and establishment of processes for effective notification of incidents, and mobilisation of resources to combat the incident or threat.

- Recovery – The return to normal operations, management of debriefs, and implementation of lessons learnt from the response process.

The following priorities are adopted when combating an incident / crisis:

- Protection of human life and welfare;
- Protection of the environment; and
- Protection of Veolia's assets.

Potential threats to the environment or public health that may arise in relation to the operation of the BTT (as presented in **Section 3.4.2**) include:

- Fire;
- Explosion;
- Overflow / spillage;
- Structural damage;
- Power or other utility failure;
- Natural disaster;
- Surface water and groundwater contamination;
- Traffic accident; and
- Geotechnical instability

4.4.1. Emergency Response Management

The [Emergency Response Plan - BTT \(MAN-5174\)](#) (ERP) incorporates an Incident Response Management Plan and a Pollution Incident Response Management Plan (PIRMP), as required under the COCs and EPL respectively.

The ERP identifies and responds to potential incidents and emergencies at the BTT as summarised in the Incident Response Process Map in **Figure 4.2** below. It describes the general policy and approach that should be followed when dealing with an emergency or incident. It aims to:

- Address various types of emergencies, including fire, explosion, rock falls, traffic accidents and wind and structural damage
- Minimise the risk to all personnel in an emergency
- Control any incident to minimise damage to plant, equipment, property and the environment.

The ERP outlines:

- Facility description, site plans and maps
- Incident identification and notification process;
- Emergency contact details;
- Emergency response procedures; and
- Training requirements

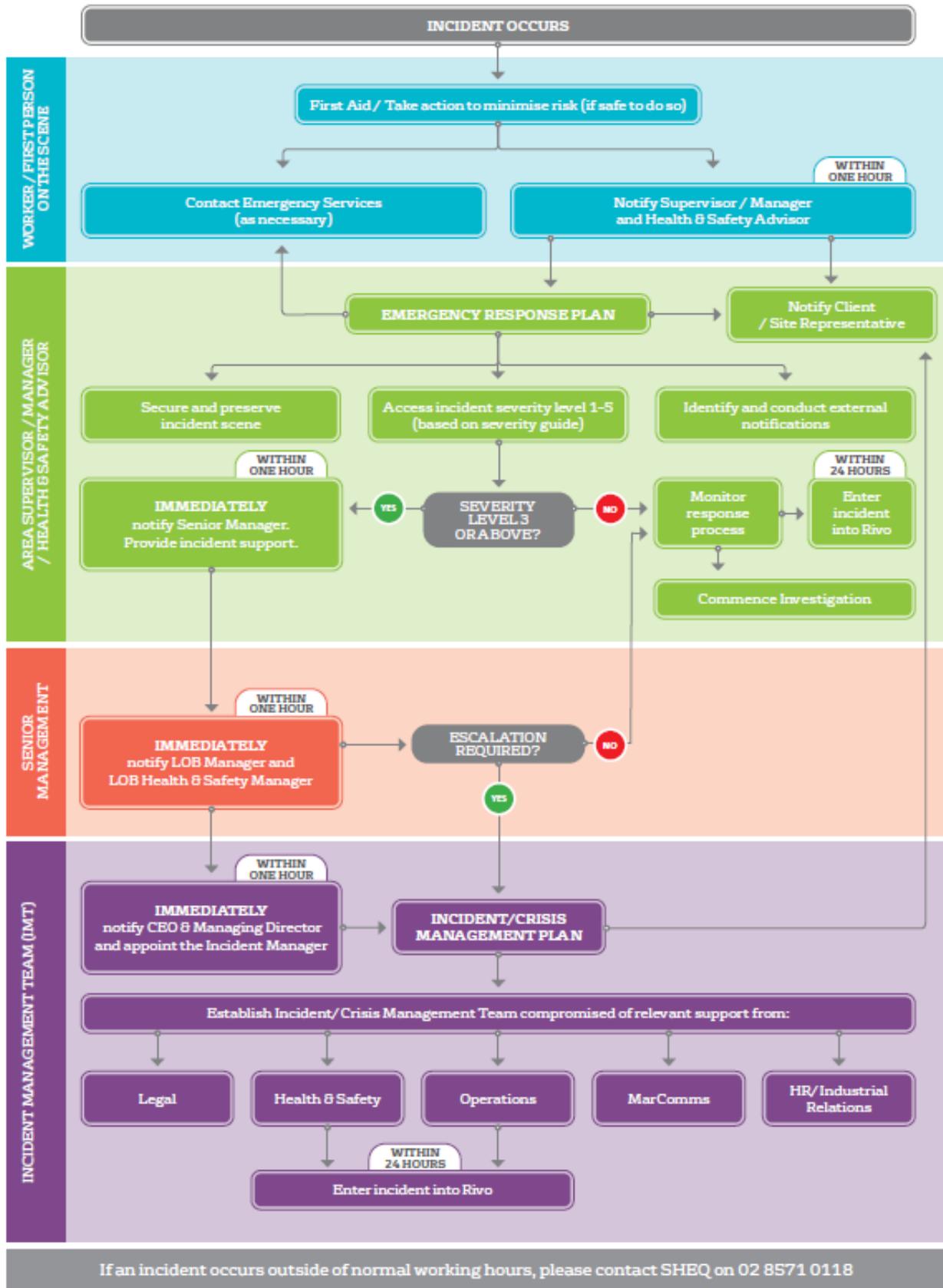


Figure 4.2 Incident Response Process Map

4.4.2. Incident Notification Requirements

4.4.2.1. Incident Reporting

Incident notification processes will reflect the extent of the event and the incident classification. Reporting will be in accordance with the Veolia [Incident Management Procedure - PRO-317](#) as summarised in **Figure 4.2**. This procedure is used for the response, investigation and reporting of incidents that have affected or have the potential to affect the environment or health and safety of a worker, contractor, subcontractor or a visitor to Veolia.

Incidents are logged in Rivo and managed in the following sequence:

- Log incident;
- Investigate incident;
- Close incident;

If further action is required, an issue can be raised or logged in Rivo. Issues raised are assigned for action to specific Veolia personnel. Corrective action can then be implemented to minimise the risk of recurrence of the incident.

Any notifiable environmental incidents or potential incidents associated with the BTT, with actual or potential significant impacts on people or the biophysical environment, will be notified as soon as practicable to the EPA, DPE, Council and other relevant agencies by the Environmental Advisor. This notification will be followed by a written report within 7 days of the incident.

A **notifiable environmental incident** is a pollution incident where there is a risk of causing or threatening material harm to the environment. A pollution incident includes a leak, spill or escape of a substance or circumstances where this is likely to occur. Material harm includes onsite and offsite actual or potential harm to:

- The health or safety of humans;
- The environment; or
- Property damage resulting in significant costs to remediate

If a notifiable environmental incident occurs, Veolia staff will immediately notify one or more of the following personnel (refer **Section 4.4.2.2 Emergency Contacts**):

- The Facilities Manager - Banksmeadow and Port Botany
- NSW Environmental Advisor

That person/s will then decide whether to notify DPE, EPA or both. Where these regulators are notified, other regulatory authorities that require notification under the PIRMP include:

- local councils (City of Botany Bay or Randwick City Councils) within which jurisdiction the incident has occurred;
- Ministry of Health;
- Fire + Rescue NSW; and
- Any other relevant authorities.

The EPA will also be notified of any incident that represents a threat to the environment. This will be done via the EPA's 24-hour Pollution Line (131 555) and a written notice will follow within 7 days, where instructed by an officer. Such incidents may include, but are not limited to:

- Fires at the BTT, either surface or subsurface;
- Identification of any failure of an environmental protection system; and,
- Any other incident or observation that could potentially pose an immediate environmental hazard outside normal operating conditions.

4.4.2.2. Emergency Contacts

The following are the internal emergency contacts for the BTT. For a comprehensive list, including regulatory authorities, local community and emergency services, refer to the ERP.

Table 4.1 Emergency Contacts

Position	Name	Phone Number
General Manager Resource Recovery	Kenneth Johnson	0448 923 850
Sydney Operations Manager	Steve Lawrence	0419 610 938
Environmental Advisor	Nicole Boukarim	0476 569 790
Environmental Manager (NSW/ACT)	Kelly Gee	0429 808 696
NSW Health & Safety Manager - Waste	Barbara Newby	0448 467 964
Banksmeadow 24hr Feedback Line	BTT Weighbridge	1800 298 981

5. Monitoring and Review of the OEMP

5.1. Monitoring and Reporting

5.1.1. Inspections, Testing and Monitoring

Monitoring at the BTT is conducted in accordance with the [Environmental Monitoring Program - BTT \(MAN-6582\)](#) which is prepared to satisfy the reporting requirements of the EPL and COCs. The Environmental Monitoring Program outlines site specific environmental issues, monitoring procedures and action plans for non-compliances. The annual environmental monitoring schedule is compiled to detail the monitoring parameters required to be monitored at the BTT and is included within the Environmental Monitoring Program.

Regular environmental inspections are undertaken by the BTT personnel to ensure that environmental controls have been implemented, meet specification, and are being maintained in accordance with the NSW Inspecting and Testing Program as summarised in **Table 5.1** below.

Table 5.1 BTT Environmental Inspection and Testing Schedule

Item	Type of Inspection / Testing	Frequency of Inspection	Responsibility
Weighbridge	Certification and/or calibration	Annual	Plant Maintenance Supervisor
Compactors 1 & 2	Calibration	Annual	Plant Maintenance Supervisor
Fire Pump Fire Extinguisher Annual Fire Statement	Inspection	Monthly Six monthly Annual	Facility Manager / Infinity Fire Protection
Weather station - download of meteorological parameters	Inspection	Weekly	Environmental Advisor
Weather station - calibration and maintenance	Calibration	Quarterly	Hydrometric Services
	Obtain Records	Quarterly	Environmental Advisor
Odour Fan servicing	Test / service / Velocity sensor check	Monthly	Fan servicing contractors/ Facility Manager
Odour audits	Testing	Six Monthly	The Odour Unit
	Obtain Records	Six Monthly	Environmental Advisor
Traffic spot monitoring as per Traffic Management Plan	Visual Inspection	Ongoing	Facility Manager, Weighbridge operator
Waste volume monitoring	Inspection	Daily	Facility Manager, Leading Hands
Site inspection and housekeeping checks	Inspection	Weekly	Facility Manager or Nominated person
Containers	Certification	Based on individual certification requirements	Facility Manager

	Inspections	Daily	Operators
	Maintenance	Annually, and as required	BTT Facility Manager
ISO Tanker (leachate)	Certification / Hydrostatic test	Every 2.5 years	Facility Manager
Pest Control Service	Inspection / service	Quarterly	Facility Manager / Pest Control Personnel
Noise	Inspection	As required	Facility Manager, Leading Hands

In addition, some aspects of environmental monitoring and checks are included in the routine operator duties, as per the site specific [Inspection and Testing Register - TEM-5184](#). For compliance related environmental monitoring, refer to **Section 5.3**. Outcomes of the monitoring are recorded in appropriate forms/checklists.

At completion of each inspection, any corrective actions required are to be recorded in Rivo and managed in a timely manner summarised in **Table 5.2** below:

Table 5.2 Corrective Action Reporting Timeframe Requirements

Priority	Action	Timeframe
Low	May not require immediate action. Monitor situation and schedule control action	Action typically required within 15 to 29 days
Medium	Control actions as soon as possible	Action typically required within 7 to 14 days
High	Significant and immediate control	Action typically required within 1-7 days

Compliance with all environmental regulatory criteria is a priority for Veolia and its staff. Specific compliance obligations are identified in the supplementary EMPs appended to this OEMP (refer **Appendix C**).

Environmental non-compliances will be managed in accordance with Veolia’s [Incident Investigation Procedure \(PRO-317\)](#) or on a case by case basis depending on the severity of the incident as described in **Table 5.3** below:

Table 5.3 Environmental Non-Compliance Investigation Procedure

Incident Classification	Investigation Team or Person	If the incident involves an injury
1. Insignificant 2. Minor 3. Moderate	A suitable competent person from the organisational unit or functional area where the incident occurred.	An Injury/ Occupational Illness Report form must also be completed by the relevant Line Manager using the short investigation form completed in Rivo

<p>4. Major 5. Catastrophic (Crisis)</p>	<p>Appropriately independent qualified person appointee as a single Lead Investigator</p>	<p>Long investigation form to be completed in Rivo for any injuries/occupational illness</p>
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5.1.2. Compliance Reporting

In the event that any monitoring results demonstrate an exceedance of a limit specified in the COCs, Veolia will submit a report to DPE and City of Botany Bay Council within 30 days of the monitoring exceedance, stating:

- a) The reason for the exceedance;
- b) Action taken to ensure the limit is not exceeded in the future;
- c) Proposed action to ensure the limit is not exceeded in the future;
- d) Timetable for implementing the proposed action in c); and
- e) Results of additional monitoring which has been conducted within 7 days of the action taken in b) and c) above, to demonstrate compliance with the limit.

Compliance reporting is required to produce systematic, comprehensive and informative reports on the environmental performance of BTT operations and in line with relevant legislative requirements. The reports required are summarised in **Table 5.4**. Reporting parameters, such as frequency of reporting and items to be included in the report, are also provided in this table.

Reporting requirements that relate to specific environmental aspects are included in the relevant supplementary EMPs (**Appendix C**).

Table 5.4 BTT Reporting Requirements

Type of Report	Frequency	Distribution	Report Inclusions
Independent Environmental Audit (IEA)	Every three years (September)	DPE and EPA	Assessment of environmental performance of facility
Annual Return	Yearly	EPA	Annual Return Form;
AEMR	Yearly	DPE and EPA	An Annual Environmental Management Report (AEMR) includes annual monitoring undertaken, summary of complaints, compliance with EPL conditions and overall environmental performance of the BTT

Odour Audits	Biannual	Company website for the public	The 6-monthly odour audit program assesses and documents fugitive odour emissions from the transfer building, ground level odour impacts, general housekeeping, complaints handling, meteorological monitoring, and actions on past odour audit recommendations. Reports are attached to the AEMR.
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5.1.3. Environment Audits

Both internal and external environmental audits are undertaken on a routine basis to confirm that the BTT meets its compliance objectives, as well as to support continuous improvement in facility operations.

The audits assess:

- Compliance of the BTT's operations against relevant legal requirements;
- the effectiveness of the OEMP to meet Veolia policies and management system requirements, legislative and industry standards;
- whether the measures and/corrective actions carried out conform to the objectives of the OEMP;
- the adequacy of implemented controls to minimise high risk environmental issues or operational activities; and
- areas for continuous improvement.

Audit findings are reported to Veolia management for inclusion in management review processes or compliance reporting.

Audit reports are maintained in Rivo to enable non-conformances and opportunities for improvement, identified through internal and external audit processes at the BTT, to be recorded, reported and responded to.

5.1.4. Identification of Potential Adverse Environmental Impacts

The identification of any potential environmental incident on site would be facilitated through:

- Conducting of monitoring – Completed by the monitoring personnel in accordance with the BTT's [Environmental Monitoring Program \(TEM-6582\)](#);
- Review of monitoring results – monitoring results are reported to the EMR, and potential non-compliances are reported to the Facility Manager for corrective actions;
- Weekly Site Inspection Checklist – a formal walk-through of the site against set parameters allows for the identification of actual or potential environmental risk. This checklist includes provision for the application of corrective measures once an event is identified and sign-off on the measures by the Facility Manager;
- Toolbox meetings – monthly meetings with site staff permit discussion in general site status, environmental/safety concerns and general information sharing; and
- Audits – The BTT is incorporated into the Veolia internal environmental auditing program, which assesses the site against compliance of the development, due diligence and best practice.

An ERP has been prepared for the BTT to identify potential environmental and public health hazards that may occur as a result of the BTT's operations and is provided in **Appendix C7**. Refer to the ERP for further details regarding the investigation of any incident.

5.2. Management Review

Reviews of the BTT OEMP and the environmental performance of the BTT assess the continuing suitability, adequacy and effectiveness of the onsite environmental management measures implemented. The inputs to the management review process will include (but not be limited to):

- internal and external audits findings;
- incidents management and investigation of non-conformance events, incidents, near misses and management of all complaints received;
- implementation of all compliance and legislative changes as identified at a corporate level; and
- trend analysis on operational data.

The output of management review will include any decisions and actions related to:

- possible changes to the management plans, procedures, practices, objectives and targets associated with the environmental management of the BTT;
- improvement of the effectiveness of the Veolia management system and its processes; and
- resource needs.

Reviews are made periodically of all site specific key performance indicators pertaining to the environment and relevant business systems. This will include reviews, and if necessary, revision of the OEMP and sub-plans following any audit, major incident or series of complaints, or any modifications to the consent.

The following forums will form part of the management review process at the BTT, conducted periodically by the facility management, in conjunction with operators as required:

- Meetings;
- Toolbox talks;
- Hazard review groups;
- Serious incident reviews; and
- Miscellaneous environmental workshops

The following processes will be used for continual improvement:

- root cause identification and correction of incidents, complaints and issues of non-conformance
- root cause identification and prevention of potential incidents and nonconformances
- process/performance review, and
- enhancement of processes and generation of new initiatives.

The OEMP is designed to be a "living document" and along with all supporting plans will be constantly updated by the Environmental Advisor if any aspects of the operation are altered that may affect the management plans. This may include, but not be limited to any changes to conditions by the various regulatory authorities. The Environmental Advisor will also review the OEMP on an annual basis after the completion of the AEMR and/or IEA, particularly if any non-conformances are recorded.

The Revision History table is updated at these times and controlled versions of the OEMP are kept at the BTT.

5.2.1. Management of Change Requirements

A change in activity or process at the BTT could potentially lead to additional hazards or risk and may have an influence on the surrounding environment. A [Management of Change Procedure \(PRO-253-2\)](#) is accessible on BMS and used on site to accommodate for any changes on site or site conditions, this includes managing changes to plant and equipment; infrastructure; operations; organisation and people.

5.3. Environmental Monitoring Program

Detailed sampling and analytical methods for the BTT are defined in relevant procedures, and work instructions stored on BMS. These have been prepared in line with relevant statutory requirements, and industry standards.

The implementation of monitoring requirements is the responsibility of the Environment team.

All sampling strategies and protocols undertaken as part of the monitoring program will be conducted in line with industry best practice. Sampling will be performed by the Environment team or contractors in accordance with the requirements set out in this OEMP and supporting EMPs. Sampling details such as the date and time in which a sample was taken, sampling locations and the details of employees/contractors carrying out the sampling will be recorded.

All technical sample analysis for compliance reporting will be performed in a NATA registered laboratory.

Where monitoring and measuring devices are used to provide evidence of conformity of product to determined requirements, these devices will be calibrated in accordance with the manufacturer's recommendations. Records of calibration will be maintained and the calibration status of the device will be clearly communicated.

Depending on the equipment to be calibrated such as analysers and/or laboratory equipment, the calibration process will be scheduled and performed using a variety of methods as per various work instructions or supplier manuals.

If the results of a calibration are not satisfactory (if the required accuracy is not reached) or if an item of testing equipment is out of service, the equipment shall be removed from use and marked out of calibration / for repairs.

The environmental monitoring regime includes the sampling criteria, locations, parameters and frequency as identified in each of the relevant Supplementary Environmental Management Plans (refer to **Appendix C**) and summarised in the [Environmental Monitoring Program - BTT \(MAN-6582\)](#). The results of any monitoring required under regulatory conditions will be published on the Veolia webpage as provided in **Section 4.3.3** and will be kept for a period of four years.

References

Document Name
Hyder, 2014a Veolia Environmental Services Banksmeadow Transfer Terminal Environment Impact Statement, Hyder Consulting Pty Ltd, April 2014
Hyder, 2014b Veolia Environmental Services Banksmeadow Transfer Terminal Response to Submissions, Hyder Consulting Pty Ltd, September 2014

Appendix A - Site Layout Plan

Appendix B - Regulatory Documents

Appendix C - Appendix C – Pre- Operational Condition Compliance Report

Appendix D - Supplementary Environmental Management Plans

Refer to Attachments:

Appendix D1	Soil, Water & Leachate Management Plan
Appendix D2	Waste Management Plan
Appendix D3	Traffic Management Plan
Appendix D4	Air Quality Management Plan
Appendix D5	Noise and Vibration Management Plan
Appendix D6	Landscaping and Vegetation Management Plan
Appendix D7	Emergency Response Plan

Appendix E - Environmental Monitoring Program