60 Donaldson Street, Wyong: Operational Environmental Management Plan

A Submission to EBH Environmental Services

August 2022

MRA Consulting Group

60 Donaldson Street, Wyong: Operational Environmental Management Plan

A Submission to EBH Environmental North Wyong Pty Ltd (ABN 44 629 427 943)
Job No. 222-1012879

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Disclaimer

This report has been prepared by MRA Consulting Group for EBH Environmental North Wyong Pty Ltd. MRA (ABN 13 143 273 812) does not accept responsibility for any use of, or reliance on, the contents of this document by any third party.

In the spirit of reconciliation MRA Consulting Group acknowledges the Traditional Custodians of country throughout Australia and their connection to land, sea and community. We pay our respects to Aboriginal and Torres Strait Islander peoples and to Elders past, present and emerging.

Operational Environmental Management Plan (OEMP)	
Project Name	North Wyong Recycling Facility
Proponent/approval holder and ABN/ACN	EBH Environmental Services Pty Ltd ABN 42 142 396 334 ACN 142 396 334
Proposed Action	Operation of a waste recycling and recovery facility for construction and demolition waste
Location of the Action	Part of Lot 32 on DP1093732; 60 Donaldson Street, Wyong NSW
Date of preparation of OEMP	30 August 2022

Review

Revision number	Person accepting responsibility for Operational Environmental Management Plan (OEMP)	Position	Signature	Date
01	Adam Gibbs	Site Manager		22/08/22

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Glossary

Terminology	Definition
ADG	Australian Dangerous Goods Code
C&D	Construction & Demolition
CCC	Central Coast Council
EC	Environmental Complaint
EPA	Environment Protection Authority (NSW)
EPL	Environment Protection Licence
GSW	General Solid Waste
LGA	Local Government Area
NCR	Non-Conformance Report
NOHSC	National Occupational Health and Safety Commission
OEMP	Operational Environmental Management Plan
PIRMP	Pollution Incident Response Management Plan
PPE	Personal Protective Equipment
SDS	Safety Data Sheet
WHS	Work Health and Safety

1 Background

1.1 Introduction

This Operational Environmental Management Plan (OEMP) has been prepared by MRA Consulting Group (MRA) on behalf of EBH Environmental North Wyong Pty Ltd. The OEMP details how the environmental management requirements for the proposed waste recycling and recovery facility will be implemented and managed on site, which is located at 60 Donaldson Street, Wyong.

The aim of the OEMP is to ensure compliance with environmental legislation and that environmental risks associated with the project are properly managed.

1.2 Description

EBH Environmental Services operates a waste recycling and resource recovery facility for construction and demolition (C&D) waste. The site is approved to process non-putrescible General Solid Waste (GSW), which may include materials such as concrete, bricks, asphalt, and steel. A storage limit of up to 18,300 tonnes at any given point in time is permitted at the site. However, there are no annual processing limits placed on the site.

The site processes incoming recycling material through segregation, crushing and screening to separate various material streams for reconstitution into raw material alternatives such as pavement and drainage materials or recovered aggregates for wholesale at the site.

1.2.1 Site Location

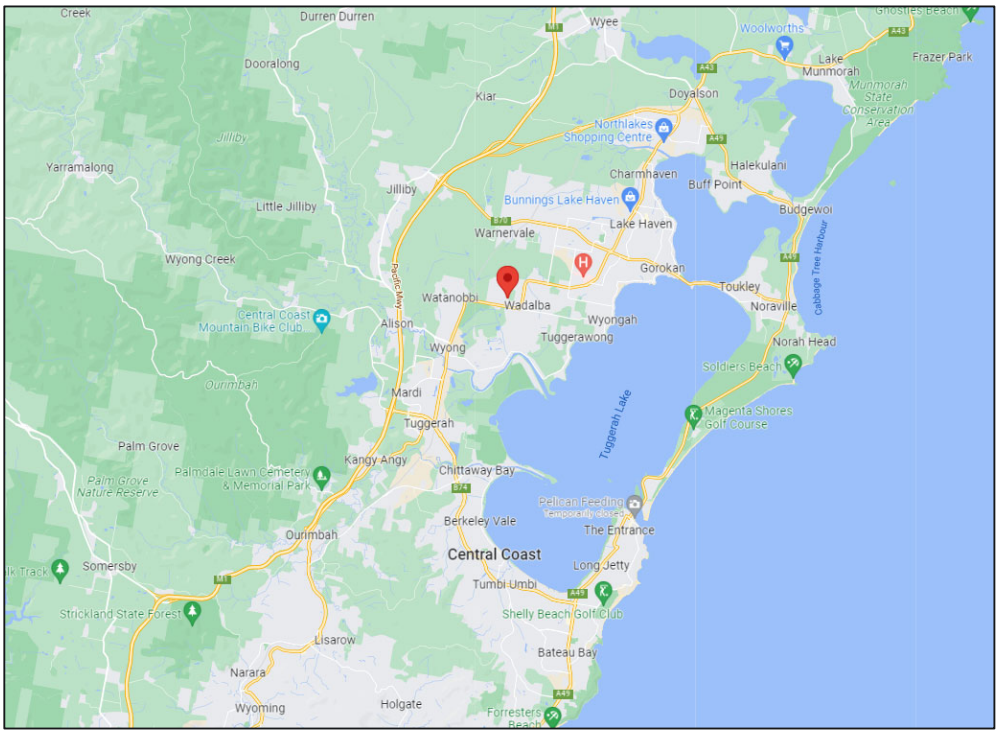
The site is identified as Lot 32 of DP1093732 at 60 Donaldson Street, Wyong, located approximately 97 kilometres north of the Sydney CBD.

The site is located in the Central Coast Council (CCC) Local Government Area (LGA). It is near the Pacific Highway and the surrounding area is predominantly a mixture of industrial and residential developments.

The entrance to the site is located at the tail end of Donaldson Street. Native vegetation is present on the site boundaries. The site itself has been cleared of all vegetation. At present, several offices, weighbridges, ablution block and associated car parking is located at the site, which additionally includes a sediment basin.

Indicative site plan showing the proposed site layout is provided in **Appendix A.**

Figure 1: Site location in context with its surroundings



Source: Google Maps, 2022

Figure 2: Aerial imagery of the site and its surrounds

Source: SixMaps, 2022

1.2.2 Hours of Operation

The site operates between the following hours:

- 7:00AM – 5:00PM Monday to Friday
- 7:00AM – 1:00AM Saturday

1.2.3 Staff

The site employs 6 FTE staff members.

1.3 Operational Environmental Management Plan Context

This OEMP summarises the objectives, responsibilities, and operational management measures to be undertaken by EBH Environmental Services to ensure the ongoing sustainable and safe use of the site as a waste recycling and recovery facility for construction and demolition waste.

The OEMP has been prepared as part of the Site's environmental management system in conjunction with:

- A Pollution Incident Response Management Plan (PIRMP)
- An Environment Protection Licence (EPL)

1.4 Operational Environmental Management Plan Objective

The OEMP is a site or project specific plan developed to ensure that appropriate environmental management practices are followed during a project.

The objectives of this OEMP are:

- to comply with applicable environmental legislation;
- minimise damage to the environment caused by the project;
- to comply with EBH Environmental Services environmental guidelines and requirements;
- to ensure all environmental safeguards are implemented correctly; and
- to monitor the project's environmental impact.

1.5 Environmental Policy

An Environmental Policy has been developed and approved by the relevant delegate as per **Appendix B** (Environmental Policy). The policy incorporates a commitment from senior management to reduce environmental impacts, meet and exceed environmental compliance requirements and implement a program of continual improvement.

The policy will be reviewed at least annually and will be updated in the event of a change to legislation, organisational position or activities and priorities at the site.

2 Environmental Management

2.1 Environmental Management Structure and Responsibility

The principal responsibilities of EBH Environmental Services workers with respect to the environment are described below. The management structure is set out in the following diagram. A matrix of specific site responsibilities is set out below.

Site Manager

The Site Manager is responsible for promoting and maintaining good environmental management. The Site Manager is to ensure that this OEMP is effectively implemented. The Site Manager is required to support the Site Supervisor and hold them accountable for their specific responsibilities. The Site Manager is responsible for taking prompt remedial action to eliminate any non-compliance or environmentally risky conditions.

Site Supervisor

The Site Supervisor is responsible for inducting all workers and subcontractors and directing site activities in accordance with this OEMP.

The Site Supervisor is responsible for taking all practical measures to ensure the site is operating according to this OEMP, and without risks to the environment. The Site Supervisor is responsible for detecting any non-compliance or environmentally risky conditions. If the Site Supervisor does not have the necessary authority to fix a problem, they are responsible for reporting the matter promptly and recommending remedial action to the Site Manager.

Workers

All workers are required to attend site inductions and follow this OEMP. Workers are responsible for advising the Site Supervisor of any potential environmental issues.

Subcontractors

All subcontractors engaged to perform work for EBH Environmental Services are required, as part of their contract, to comply with this OEMP and to comply with directions from the company's designated officers. Failure to comply will be considered a breach of the contract and sufficient grounds for termination of the contract.

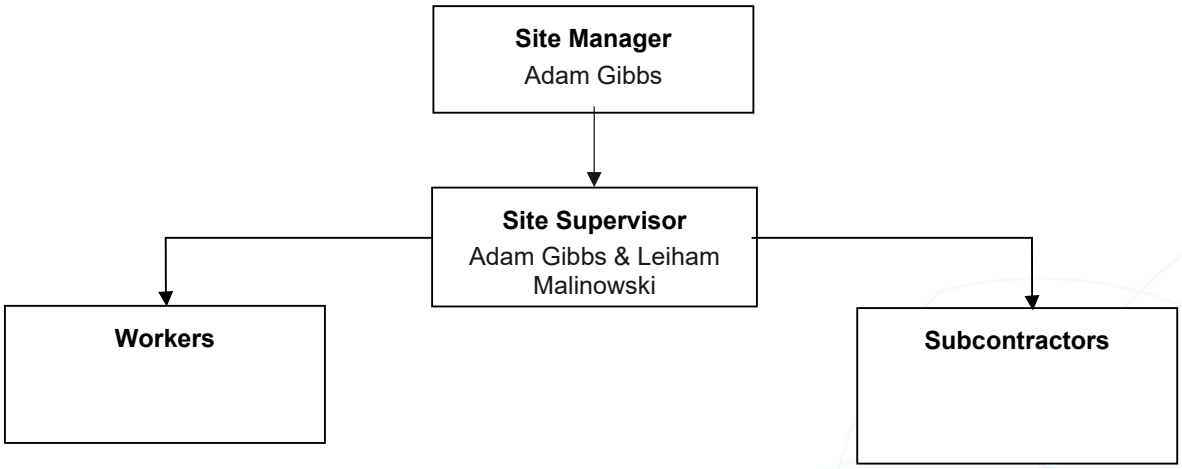


Table 1: Project Environmental Roles & Responsibilities Matrix

TASK	Site Manager	Site Supervisor	Workers	Subcontractors
Inducting workers and subcontractors and directing site activities in accordance with the OEMP.	2	1	2	2
Identifying, assessing and eliminating any non-compliance or environmentally risky conditions and documenting the risk controls implemented.	1	1	2	2
Promoting and maintaining good environmental management in accordance with the relevant environmental legislation, regulations and laws.	1	1	2	2
Implementing practical measures to ensure the site complies with the OEMP and project specifications.	2	1	2	2
Maintaining, providing updates and supplying this OEMP to relevant authorities and workers.	1	2	2	2
Monitoring and assessing subcontractors for the project to ensure environmental regulations are met and relate to the works undertaken.	1	2	2	2
Maintaining stocks for environmental control.	1	1	2	1
Provide and maintain a hazardous substances register for hazardous substances used and stored in the workplace.	1	1	2	2

1 = has responsibility for the overall implementation and / or management of the process/procedure on the project.

2 = has responsibility for complying with the process/procedure on the project.

2.2 Approval and Licensing Requirements

There are a number of approvals and licensing requirements for this development which are summarised below.

EBH Environmental Services will ensure that any licences, permits and approvals are up-to-date to reflect the operational requirements of the facility.

2.2.1 Development Consent

The site operates under Development Consent (DA/2451/1998/H) for a Combined Recycling Operation issued by the then Wyong Shire Council in 1999 covering Lot 32 of DP1093732 for CBS Recyclers.

2.2.2 Environmental Protection License (EPL)

The NSW Environment Protection Authority (EPA) issues Environmental Protection Licences to the owners or operators of various industrial premises under the Protection of the Environment Operations Act 1997 (POEO Act).

EBH Environmental Services Pty Ltd currently holds an Environment Protection Licence (EPL) (Licence no. 20675) for 60 Donaldson Street Wyong NSW 2259, which was transferred from CBS Recyclers (Rexdor Pty Ltd) in October 2018.

Licence 20675 authorises the following scheduled activities - Resource Recovery and Waste Storage - to be conducted at the premises, 60 Donaldson Street WYONG NSW 2259, which is formally known as Part of Lot 32 on DP1093732.

The EPL defines the types and quantity of wastes authorised to be processed and stored at the site as part of resource recovery activities as well as operational and reporting conditions for activities and events.

Permitted wastes include only general solid waste (non-putrescible) comprising of, for example concrete, bricks, asphalt and steel (building and demolition waste). A premises storage limit of 18,300 tonnes at any point in time is prescribed, but there is no annual processing limit.

2.3 Reporting

The Site Manager will ensure control of all project environmental documentation and reports. Adequate records will be maintained to demonstrate conformance to specified environmental requirements. The records to be maintained for this project will include, but not be limited to, the following:

- monitoring records;
- non-conformance, corrective action and preventive action
- complaints management;
- training and induction records;
- audit records;
- permits, licenses, and approvals.

These documents will be maintained within the site file.

2.4 Environmental Training

All EBH Environmental Services workers who will be working on this site shall receive site-specific induction training. The induction training will include:

- familiarisation with the requirements of this OEMP;
- environmental emergency response training; and
- familiarisation with site environmental controls.

EBH Environmental Services may combine the Work Health and Safety (WHS) and Environmental induction training into one session. A record of the site induction will be made on the Site Environmental Induction Register (see **Appendix C**).

2.5 Emergency Contacts and Responses

This OEMP sets out EBH Environmental Services management of environmental emergencies during the project. It includes:

- the names of key emergency response personnel and contact details (including all-hours telephone numbers);
- contact details for emergency services (e.g. ambulance, fire brigade, spill clean-up services);
- the location of on-site information on hazardous materials, including SDS (Safety Data Sheets) and spill containment material;
- steps to follow to minimise damage and control the emergency; and
- instructions and contact details for notifying the Site Supervisor, EPA, local council, nearby residents or the community if necessary.

2.5.1 Key Emergency Response Personnel

The Site Manager Adam Gibbs will be the first point of contact when an incident or spill occurs. They can be contacted 24 hours a day.

Contact details including emergency services are included in Table 2 below.

Table 2: Emergency Response Contact Details

Site Contact Details	
Emergency Services	
Ambulance, Fire or Police	000
Poisons Information	13 11 26
First Aiders	
Jordan Thornton	0426 286 994
Leihm Malinowski	0413 857 063
Utilities	
Water Pollution	132 090
Electrical Emergency	13 13 88
Gas	131 909
Telephone	132 203
Dial Before You Dig	1100
EPA (24 hour pollution line)	131 555
Site Manager	
Adam Gibbs	0427 025 072
Site Supervisor	
Adam Gibbs, Leiham Malinowski	0427 025 072
Health and Safety Representative (HSR)	
Jordan Thornton	0426 286 994

2.5.2 Hazardous Substances

EBH Environmental Services will maintain an up-to-date register of Hazardous Substances and Material Safety Data Sheets (MSDS) for all chemicals stored on the site (see **Appendix C**).

Controlled, updated copies of these MSDS will be readily available to the Site Manager and Site Supervisor and prominently displayed at the worksite.

2.5.3 Emergency Response Procedures

2.5.3.1 Fire Emergency

Steps to manage a fire emergency:

- Call **'000'** as soon as possible. If '000' does not work on your mobile phone call **'112'**;
- If safe to do so leave the work area. If unsafe to leave, seek refuge in a safe area immediately;
- Go to the designated Emergency Assembly Area or to a clear/open area;
- Make sure all workers are present and accounted for, do not return to the work area to locate any missing workers; and
- Notify the Site Supervisor and wait for instructions.

2.5.3.2 Gas Leak Emergency

Steps to manage a gas leakage emergency:

- Call the Site Supervisor immediately, if deemed necessary call the Fire Brigade on **'000'**. If **'000'** does not work on your mobile phone call **'112'**;
- Site Supervisor to immediately arrange to turn off the gas supply;
- Site Supervisor to turn off the site's electrical supply;
- If deemed necessary notify all persons to evacuate the work area and assemble at the Emergency Assembly Area;
- Control the movement of people to the Emergency Assembly Area;
- Check all workers and others are in attendance; and
- Remain at the Emergency Assembly Area until notified that the area is safe to reoccupy.

2.5.3.3 Leak or Spill Emergency

Steps to manage any Leak or Spill in a work site:

- Identify the source of the problem;
- Stop goods leaking;
- Contain spilt material, using spills kit or sand;
- Notify Site Supervisor;
- Remove spilt material and place in sealed container for disposal (if possible); and
- Site Supervisor to record incident.

OR

- as suggested on the MSDS

3 Implementation

3.1 Risk Assessment

The risk to the environment of carrying out the project has been considered and documented.

The qualitative risk assessment identifies key environmental aspects using the risk rating presented in Table 3 below. The assessment calculates a risk ranking based on the likelihood of occurrence of an event and the expected consequence in the case of the event occurring.

Table 3: Risk analysis categories and criteria for risk rating

Likelihood		Consequence				
		Not significant 1	Minor 2	Moderate 3	Major 4	Critical (severe) 5
Rare	A	L	L	M	M	M
Unlikely	B	L	L	M	M	H
Possible	C	L	M	M	H	V
Likely	D	M	M	H	V	V
Almost certain	E	M	H	V	V	V

(Risk Rating = Likelihood x Consequences)

LEGEND:

L	**Low Risk**	Responsible Managers need to develop or modify policy or procedure to address the risk. A simple action plan can also be developed.
M	**Moderate Risk**	Action timeframe determined and Risk Action Plan developed by responsible manager with relevant Director informed of progress.
H	**High Risk**	Action timeframe to be determined in conjunction with the Emergency Management Team (EMT) and Risk Action Plan to be developed by the responsible manager.
V	**Very High Risk**	Immediate action to be initiated in conjunction with EMT and Risk Action Plans to be developed by responsible manager and implemented immediately.

The criteria for evaluating likelihood and consequence of risks are identified in Table 4 and Table 5.

Table 4: Criteria for evaluating likelihood

Level	Descriptor	Example of Description	Example Frequency of Occurrence
A	Rare	Only ever occurs under exceptional circumstances	Once in more than 20 years
B	Unlikely	Conceivable but not likely to occur under normal operations; no evidence of previous incidents	Between once in 5 years and once in 20 years
C	Possible	Not generally expected to occur but may under specific circumstances	Between once a year and once in 5 years
D	Likely	Will probably occur at some stage based on previous incidents	Between once a month and once a year
E	Almost certain	Event expected to occur most times during normal operations	Once per month

Table 5: Criteria for evaluating consequence

Level	Descriptor	Safety	Financial	Operational	Environmental
1	Not significant	No medical control required	Low financial cost	< 6 hours facility closure or disruption of operations	No environmental harm
2	Minor	First aid only	Medium financial loss	> 6 hours but < 24 hours facility closure or disruption of operations	Release to environment immediately contained
3	Moderate	Medical treatment, lost time to injury or temporary reversible illness	Moderate financial loss	> 24 hours but < 48 hours facility closure or disruption of operations	Release to environment contained with internal assistance
4	Major	Extensive injuries – permanent partial disability or severe lost time to injury	Major financial loss	> 2 days but < 5 days facility closure or disruption of operations	Release to environment contained with external assistance
5	Critical (Severe)	Death or irreversible disability	Huge financial loss (> $5m)	> 5 days facility closure or disruption of operations	Pollution event with detrimental effect

3.2 Environmental Management Activities and Controls

The following environmental management activities, mitigation and control measures will be adopted to prevent or minimise environmental impacts.

3.2.1 Air Quality

Table 6: Air Quality - Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Emissions of air pollutants from plant			
Undertaking routine maintenance of all equipment, including the pollution control system.	Moderate	Site Supervisor	Ongoing during operational phase
Potential Impact: Emissions of air pollutants from vehicles			
EBH owned vehicles will undergo a standard maintenance process on a regular schedule which will ensure efficiency and minimal exhaust emissions.	Moderate	Site Supervisor	Ongoing during operational phase
Limiting engine operating times to a minimum. It is recommended that vehicle engines be turned off if the vehicle is going to be stopped for more than 1 minute.	Moderate	Site Supervisor	Ongoing during operational phase
Potential Impact: Dust emissions from site operations			
Maintaining good housekeeping on all areas of the Site, including regular cleaning of all internal and external areas of the site.	Moderate	Site Supervisor	Ongoing during operational phase
Vehicles carrying materials on and off site will be appropriately covered.	Moderate	Site Supervisor	Ongoing during operational phase
Reviewing operational practices and management plans regularly and training of relevant staff regarding material handling.	Moderate	Site Supervisor	Ongoing during operational phase
Usage of mobile or fixed dust suppression sprinklers to suppress dust generation during operation	Moderate	Site Supervisor	Ongoing during operational phase
Monitor local weather conditions and reduce operations during periods of high wind.	Moderate	Site Supervisor	Ongoing during operational phase

3.2.2 Noise

Table 7: Noise - Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Unacceptable noise levels on site			
Work equipment will be maintained in good working order. Where required, noise suppressors will be installed.	Moderate	Site Supervisor	Ongoing during operational phase
Hearing protection will be worn as/ when appropriate e.g. earplugs or earmuffs.	Moderate	All workers	Ongoing during operational phase
Potential Impact: Unacceptable noise levels at sensitive receivers			
Work equipment will be maintained in good working order. Where required, noise suppressors will be installed.	Moderate	Site Supervisor	Ongoing during operational phase
Records would be kept of noise complaints.	Moderate	Site Supervisor	Ongoing during operational phase

3.2.3 Water Quality

Table 8: Water Quality - Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Contamination of water due to chemicals, fuels or wastes			
Utilise wet retention basin, spoon drains and bunding to ensure all rainfall falling on site is captured in a closed system or treated prior to release.	Moderate	Site Supervisor	Ongoing during operational phase
Perimeter bunding or berms will be utilised to prevent ingress of overland flow.	Moderate	Site Supervisor	Ongoing during operational phase
Dewater basin ahead of forecast heavy periods of rain and inspect basin following heavy rainfall.	Moderate	Site Supervisor	Ongoing during operational phase
Minimise length of unprocessed waste storage onsite where possible.	Moderate	Site Supervisor	Ongoing during operational phase
Hazardous liquids to be stored in appropriately bunded containers with 110% capacity of the largest tank. Diesel will be stored within a self-bunded vessel.	Moderate	Site Supervisor	Ongoing during operational phase
Spill kit to be available to clean up liquid spills and a daily tidy of the site is to be part of regular maintenance activities.	Moderate	Site Supervisor	Ongoing during operational phase
Truck operators will be trained in the clean-up of spills.	Moderate	Site Supervisor	Ongoing during operational phase

3.2.4 Hazards

Table 9: Hazards- Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Fire on site			
No smoking will be allowed in the vehicle maintenance area.	Moderate	Site Supervisor	Ongoing during operational phase
Fire suppression equipment will be supplied and maintained in accordance with the manufacturer's instructions.	Moderate	Site Supervisor	Ongoing during operational phase
Staff will be trained in the use of fire suppression equipment.	Moderate	Site Supervisor	Ongoing during operational phase
Potential Impact: Spillage of hazardous chemicals			
Incompatible chemicals and fuels will be stored separately.	Moderate	Site Supervisor	Ongoing during operational phase
Chemicals and fuels will be clearly labelled, securely sealed when not in use, and stored in appropriate containers	Moderate	Site Supervisor	Ongoing during operational phase
Flammable chemicals would be stored in a dedicated, well-ventilated area, away from ignition sources.	Moderate	Site Supervisor	Ongoing during operational phase
Bunding will be used to capture any spills or leaks.	Moderate	Site Supervisor	Ongoing during operational phase
A spill kit will be available to safely clean up spills.	Moderate	Site Supervisor	Ongoing during operational phase
Personal protective equipment (PPE) will be used, cleaned and maintained properly.	Moderate	Site Supervisor	Ongoing during operational phase
Training will be provided to staff in procedures for accidental consumption, splashes, spill contamination or other chemical or fuel emergencies.	Moderate	Site Supervisor	Ongoing during operational phase

3.2.5 Traffic

Table 10: Traffic - Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Increased traffic volumes and frequency			
Traffic movements associated with the operation are not expected to cause significant impacts to the surrounding traffic network.	Low	Site Supervisor	Ongoing during operational phase

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Reduction in road safety			
Site speed limits are to be observed at all times	Moderate	Site Supervisor	Ongoing during operational phase
All vehicles will enter and leave the site in a forward direction.	Moderate	Site Supervisor	Ongoing during operational phase

3.2.6 Heritage

Table 11: Heritage - Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Disturbance or destruction of items of indigenous heritage			
Should an item of indigenous significance, or suspected significance, be discovered on the site, all work in the vicinity of the area would cease and the site management would be contacted immediately to engage in the appropriate course of action which may include contacting a heritage professional, notifying the NSW Department of Environment, Energy and Science and the LALC.	Low	Site Manager	Ongoing during operational phase
Potential Impact: Disturbance or destruction of items of non-indigenous heritage			
Should an item of non-indigenous significance, or suspected significance, be discovered on the site, all work in the vicinity of the area would cease and the site management would be contacted immediately to engage in the appropriate course of action which may include contacting a heritage professional, notifying the NSW Department of Environment, Energy and Science and the LALC.	Low	Site Manager	Ongoing during operational phase

3.2.7 Biodiversity

Table 12: Biodiversity - Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Disturbance or damage to flora and fauna			
The vegetated areas of the site are not to be disturbed or removed.	Low	Site Supervisor	Ongoing during operational phase
All waste processing operations and storage of materials will occur within the site area cleared of vegetation.	Low	Site Supervisor	Ongoing during operational phase
Trucks and other vehicles will park in designated areas on hardstand only, minimising any risk to vegetated areas.	Low	Site Supervisor	Ongoing during operational phase

3.2.8 Visual Impact

Table 13: Visual Impact- Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Decrease in visual amenity of the surrounding area			
Existing vegetation at the site will not be affected and will be maintained as/ when appropriate.	Low	Site Supervisor	Ongoing during operational phase
Lights will be directed downward as much as possible.	Low	Site Supervisor	Ongoing during operational phase
Site lighting will be directed away from sensitive locations such as residential properties.	Low	Site Supervisor	Ongoing during operational phase

3.2.9 Amenity

Table 14: Amenity- Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Detrimental impact on local amenity			
Site clean-up during daily operations to control windblown litter.	Low	Site Supervisor	Ongoing during operational phase
Staff would monitor the site for unauthorised persons in staff-only areas.	Low	Site Supervisor	Ongoing during operational phase
Flood lights would be angled downward to avoid glare.	Low	Site Supervisor	Ongoing during operational phase

3.2.10 Socio-economic

Table 15: Socio-economic- Potential Impacts and Controls

Control Measure	Residual Risk	Responsibility	Timing Frequency
Potential Impact: Detrimental social impacts on the locality due to increased air pollution, noise, traffic, and decreased visual amenity			
No negative social impacts are anticipated to occur as a result of the operation of the site.	Low	-	Ongoing during operational phases
Potential Impact: Local economic impact			
The site operations will result in a net social benefit due to the generation of 6 full time jobs in the Central Coast LGA.	Positive	-	Ongoing during operational phase

3.3 Environmental Schedules

This OEMP refers to a number of environmental schedules comprising forms, registers and checklists. They are listed below and included in **Appendix C**.

1. Site Environmental Induction Register
2. Site Environmental Inspection Checklist
3. Environmental Complaint Form
4. Non-Conformance Report Form
5. Hazardous Substances Register
6. Safety Data Sheets (SDS) Register

4 Monitoring and Review

4.1 Environmental Monitoring

EBH Environmental Services will monitor the environmental controls listed in Section 3.2 through regular site environmental inspections.

Site environmental inspections will be undertaken on a daily/ weekly basis and will be recorded by the Site Supervisor on the *Site Inspection Checklist* (see **Appendix C**).

Management and performance indicators will track:

- Implementation of the policies and training included in this OEMP and other management plans for the site;
- Conformance, e.g. legal compliance, fines, and penalties; and
- Community relations/complaints.

Operational performance indicators will track:

- Inputs, outputs, residual material/ waste.

A quarterly meeting of management staff will manage and record environmental obligations, such as:

- Legal compliance;
- Fines;
- Community complaints;
- Operations;
- Environmental audit results; and
- Non-conformance.

4.2 Environmental Auditing

Quarterly site audits aimed at evaluating the environmental conformance of the site operations will be carried out by EBH Environmental Services. Any deficiencies identified during the audits shall be documented and actioned in accordance with EBH Environmental Services corrective action process (see Section 4.5).

The audits to be carried out and their frequency are listed in Table 16.

Table 16: Site Audit Plan

Audit Type	Frequency	Record	Auditor
Operational Environmental Management Plan (OEMP)	Yearly	Audit Report	Site Manager / External Auditor
Sub-contractor Environmental Performance Audit	Yearly	Audit Report	Site Manager / External Auditor
Site Inspection	Daily / Weekly	Site Environmental Inspection Checklist	Site Manager / Site Supervisor

4.3 Communication

To minimise impacts on the public by the site operations, residents and adjacent property owners will be notified in writing before the works commence and at appropriate stages during the operation of the facility. The letter will contain details of the intended work, where relevant, the duration of the activities, information regarding any access interruptions and details of whom to contact with questions regarding the works. The Site Manager will seek permission if there is any need to access private property.

Project Signage will be erected at the site, as required and appropriate.

EBH Environmental Services will undertake external and on-site communication in case of environmental incidents and emergencies, including communication with subcontractors. External communication will include informing nearby residents of proposed works, incidents and emergencies and contacting regulatory agencies if required.

4.4 Complaints

Community groups, customers, interested parties, etc may advise of practices, activities and processes that are related to the environment by a variety of methods. These may include a non-conformance report, email/letter, telephone complaint, newspaper/magazine report and verbal protest.

On receipt of a complaint, the person receiving the complaint will notify the Site Manager and the complaint will be recorded using the *Environmental Complaint Form* (**see Appendix C**). The Site Manager will follow up the complaint and take corrective action as required.

4.5 Corrective Action

A non-conformance occurs when a procedure or environmental control is not followed, or does not perform as required by this OEMP. EBH will monitor non-conformances to the OEMP and initiate corrective and preventive action where required. All non-conformances will be recorded on the *Non-Conformance Report Form* (see **Appendix C)**.

EBH Environmental Services will undertake corrective action in case of incidents that have an environmental impact or works not carried out according to the required standard. Procedures for identifying corrective action include:

- An OEMP review;
- investigation into the causes of incidents and recording of the results; and
- evaluating further environmental risks.

5 Operational Management Plan Review

This OEMP will be reviewed by the Site Manager as required to ensure its continuing suitability and to ensure it is conforming to the OEMP's environmental objectives and legal requirements. Reviews will be undertaken as necessary as a result of any of the following:

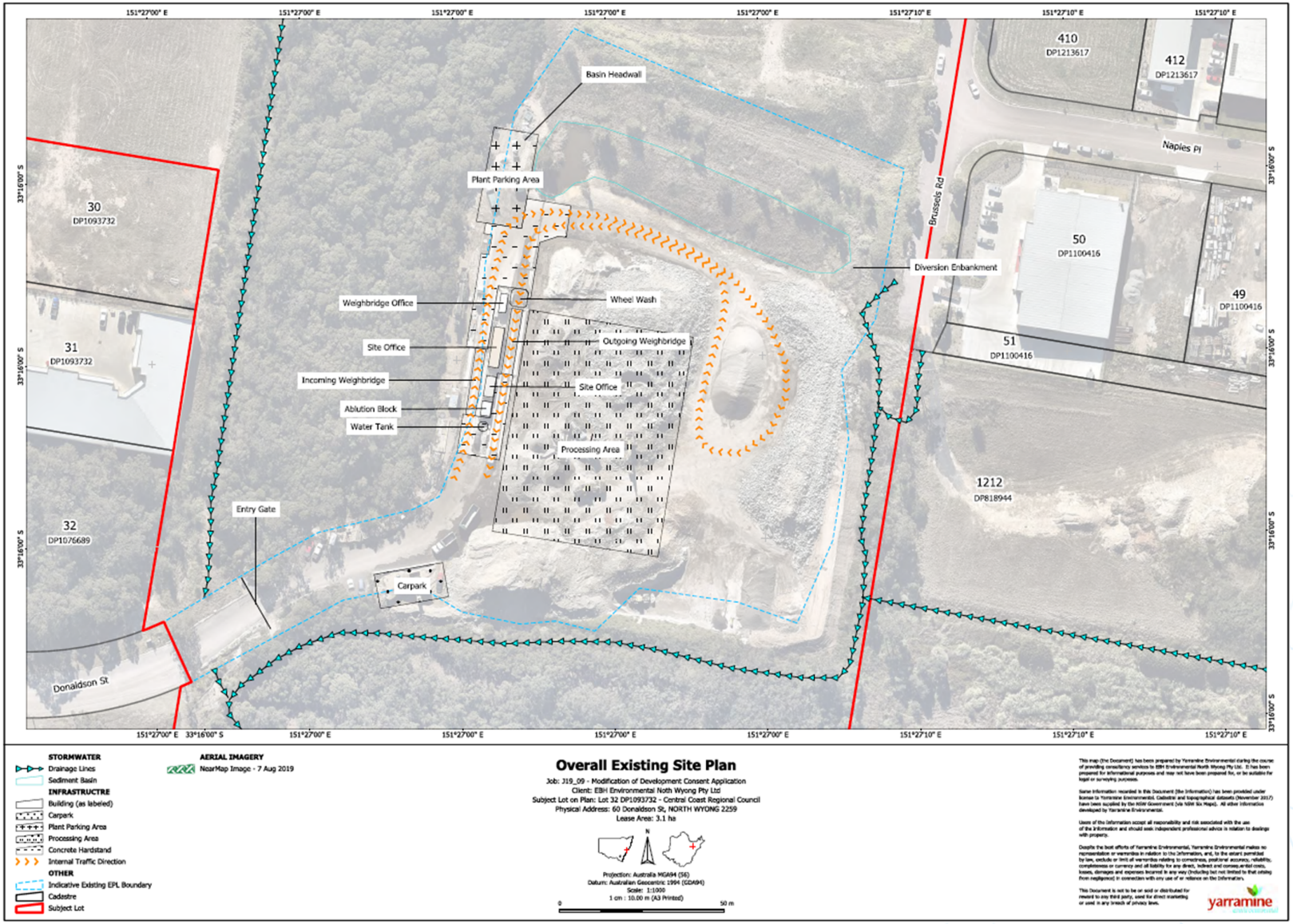
- when there is a change in the site activities that requires a change in environmental controls;
- when there is a need to improve performance in an area of environmental impact;
- at the completion of environmental audits as required; or
- as a result of changes in environmental legislation applicable and relevant to the site and operations.

Reasons for making changes to the OEMP will be documented. A copy of the original OEMP document will be kept for the project records.

The Site Manager is authorised to change and re-issue the OEMP. The Site Supervisor is to be informed of any changes made by the Site Manager.

The Site Supervisor is responsible for ensuring the work crew are complying with the current OEMP, and for informing the work crew of any changes. The Site Supervisor is responsible for ensuring the workers are aware of changes before starting any works or operation.

Appendix A Indicative Site Plan



Appendix B Environmental Policy

ENVIRONMENTAL POLICY

1. COMPANY DETAILS	
Site Manager: Adam Gibbs	**Contact number:** 0427 025 072
Issued to: Adam Gibbs / Leiham Malinoski	
Date of Issue: 30/08/2022	**Date of Review:** 30/08/2023

2. INTRODUCTION

EBH Environmental Services has developed the following policy to create a safe and healthy workplace. This policy outlines the rules, responsibilities and procedures for environmental protection.

3. SCOPE

This policy applies across the organisation of EBH Environmental Services and across all workplaces/worksites under this organisations control, including contractors/sub-contractors and visitors to the workplace/worksite. EBH Environmental Services will continually improve our environmental performance, prevent environmental harm associated with our activities, develop employee environmental awareness, report on environmental performance and minimise waste.

4. RULES

- Wherever practicable employees at EBH Environmental Services will reduce the volume of waste generated and reuse and recycle. Whenever possible new products and supplies should be reusable and/or recyclable;
- Where possible purchase responsibly for example purchase local products to reduce transport emissions and support the local community, be aware of where the product or its raw components have come from – is it causing deforestation, loss of habitat or exploiting workers in another country;
- Prevent any actions from work activities causing environmental damage by following preventative procedures. In the event of an incident/accident follow the emergency procedures, making sure that the appropriate equipment is available for clean-up and that a quick response is applied to eliminate or reduce any damage; and
- Be aware of environmental issues and safeguards, including air quality, noise, water quality, heritage, biodiversity and waste.

5. RESPONSIBILITIES

Site Managers and Supervisors must:

- Implement and review this policy;
- Consult with workers about this policy;
- Provide resources, information, training and supervision for workers to allow them to adhere to the rules and have the knowledge and resources to follow the procedures and understand their roles and responsibilities;
- Comply with statutory requirements, codes, standards and guidelines;
- Implement and comply with site Operational Environmental Management Plans (OEMP);
- Make sure all equipment is serviced and not showing visible emissions;

- Make sure noise and air pollution are monitored and kept to the appropriate levels;
- Make sure all incidents are investigated and if required appropriate disciplinary action carried out; and
- Undertake site environmental inspections using the Site Environmental Inspection Checklist and enter applicable waste details using the Waste Management Plan when required.

Workers must:

- Comply with the rules of this policy and follow environmental procedures;
- Not act in a manner that places the environment at risk;
- Use, store and dispose of chemicals as per the Safety Data Sheet (SDS);
- Remove waste from the workplace / worksite and place in designated waste areas;
- Wash machinery in designated area;
- Report any incidents or complaints to the site manager / supervisor;
- Participate in consultation and training in relation to environmental management; and
- Advise site manager or supervisor of any potential breaches of plans or statements, and sightings of rare plants or animals, fauna or archaeological or heritage items.

6. SIGN OFF

Company Representative:

Signed: David Burgun **Date:** 18.10.2022

Name: David Burgun **Position:** Managing Director