

**ENVIRONMENTAL MANAGEMENT PLAN
RPG DEMOLITION
123 MAGOWAR ROAD GIRRAWEE NSW**

Prepared for: Claron Consulting Pty Ltd
RPG Demolition
Cumberland Council

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NATIONAL INTEGRATED CREATIVE SOLUTIONS

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***We Aim to Excel in all Aspects of Business
We Speak your Environmental Language***

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ABBREVIATIONS

BPEMG	Best Practice Environmental Management Guideline
EMP	Environmental Management Plan
Council	Cumberland Council
DCC	Development Consent Conditions
DG	Dangerous Goods
DPE	NSW Department of Planning and Environment
DPI	NSW Department of Planning & Infrastructure
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
NPWS	National Parks and Wildlife Service
POEO Act	Protection of the Environment Operations Act 1997
RMS	Roads & Maritime Services
SCA	Sydney Catchment Authority
SEE	Statement of Environmental Effects prepared by Claron Consulting Pty Ltd for the proposed development
SEMP	Site Environmental Management Plan
SEPP	State Environmental Protection Policy
SMA	Sydney Metropolitan Area

1. INTRODUCTION

National Integrated Creative Solutions has been commissioned by RPG Demolition (RPG Demolition) to prepare an Environmental Management Plan (EMP) for its proposed Resource Recovery facility at 123 Magowar Road, Girraween NSW.

This EMP was prepared in context of the following two documents:

- AS/NZS ISO 14001, *Environmental Management Systems – Specifications with guidance for use* and AS/NZS 14004, *General guidelines on principles, systems and supporting techniques*, and
- *Guideline for the Preparation of Environmental Management Plans* published by the Department of Infrastructure, Planning and Natural Resources in 2004.

This EMP provides the framework so that the proposed activities are undertaken mindful of potential environment aspects and impacts of activities to minimise potential to cause nuisance and harm to all those potentially affected by the proposed activities to be undertaken on site. The EMP also serves to ensure that RPG Demolition commitments to minimise and reduce potential harm to the environment and human health will be adhered to.

1.1 OBJECTIVES

1.1.1 General

The purpose of this Environmental Management Plan (EMP) is to provide a reliable framework for the management of all potential environmental impacts that are likely to be caused by the proposed activities on the RPG Demolition site, while recognising the needs of industry, government and the community, and the need for the site to operate economically and efficiently. This EMP is designed to document site management practices and procedures that utilise the latest and most practical technologies available to minimise the impact of the proposed activities on the environment, local residents and surrounding developments.

This EMP is being prepared to ensure appropriate management of all potential environmental aspects and impacts that may occur during the operation stage of this project. The EMP has been developed to consider the management of site specific environmental impacts, with consideration to its particular situation and using appropriate and practical management practices during the operation stage. The EMP may require periodic reviews and revisions in order to respond to changes in best management practices and technology advances during the operation stage.

This EMP covers the following aspects associated specifically with the proposed activities:

- Planning and environmental statutory requirements;
- Site-specific environmental management measures and procedures;
- Roles and Responsibilities of management and staff;
- Training of staff and contractors;

- Communications;
- On-going monitoring of EMP performance; and
- Detailed procedures in a format for hands-on operations.

Commitments have been made by RPG Demolition management that the objectives above will be achieved, maintained and adhered to continuously as part of the operation stage of the development.

1.1.2 Specific Objectives

Since this EMP has been prepared to form part of the Development Application to Cumberland Council (Council), there are no specific objectives specified or identified in any relevant statutory instrument. Notwithstanding the above, in some cases, Council may require the EMP to address certain specific aspects as part of the Development Consent conditions. In this case, this EMP will be reviewed to accommodate and address these specific requirements. The EMP always includes and addresses site specific environmental aspects.

2. APPLICANT

The applicant is RPG Demolition (RPG Demolition) which is an Australian privately owned and operated Company with an ABN 17 057 526 431. The Company's details are outlined below:

Postal address: PO Box 247 Merrylands NSW 2160
Phone No: 9636 2888 (office)
Email: peter@rpgdemo.com.au

Based on an ASIC search, the applicant is an Australian privately owned and operated Company which became active in 2007. However, the companies' directors have been in similar operations for more than 45 years. The key personnel who have a management role in the Company are included in **Table 2-1**.

Table 2-1: List of Key Personnel Associated with the Application

Position	Name	Contact Details
General Manager	Peter Issa	0411 694 751
Planning Consultant	Brent Winning	0418 242 738
Environmental Consultant	Nicolas Israel	0421 776 003

Note: Peter Issa is the contact for RPG Demolition

RPG Demolition is an environmentally friendly company that is committed to continuous environmental improvements in all aspects of its business. It encourages all its employees and contractors to comply with all environmental requirements at all times.

RPG Demolition is very keen in finding the best environmentally friendly and ecologically sustainable solutions for these excellent quality materials to ensure that NSW waste management strategies are fully implemented to reduce the quantities of waste going to landfills.

3. SITE DETAILS

3.1 SITE LOCATION

The site is located at 123 Magowar Road in the suburb of Girraween and the Local Government area of Cumberland Council (Council) in the State of New South Wales (NSW). Full details of the site location are provided in **Figures 3-1, 3-2 and 3-3** as well as **Table 3-1**. More Specifically, **Figure 3-1** presents an aerial view of the site in the local context; **Figure 3-2** presents a closer aerial view of the site where site features can be easily identified including the factory building, the external areas and driveway and **Figure 3-3** presents the location of the site and surrounding properties including their Lots and DPs. In relation to the current land zoning of the site, full details are provided in Section 4 of this document.

Figure 3-1: Aerial View of the Site in the Local Context



Figure 3-2: Aerial View of the Site – Closer View



Figure 3-3: Location of the Site with surrounding properties including Lots and DPs



3.2 SITE DESCRIPTION

The subject site is located in Girraween, approximately 1 km north of the Great Western Highway and 6 km west of Parramatta CBD (direct line), in the Parish of Prospect, County of Cumberland and in the Cumberland Local Government Area within the State of New South Wales. The subject site consists of one (1) Lot; Lot 2 DP545501. The total area of the lot is approximately 0.225 hectares (or 2,251 m²). The proposed development will be mostly located within the existing buildings and structures. Access is from Magowar Road via a driveway located adjacent to the eastern boundary of the site. The land is relatively flat, sloping gently towards the South and South West within the back of the site to a slightly greater slope at the front of the site. The site is located within the Girraween light industrial precinct.

According to Council's advice, the site is not located within a bush fire prone area.

The site is rectangular L-shape, and is surrounded by the following properties:

- Northern boundary with Lot 1 DP545501
- Eastern boundary with Lot A D375963
- Southern Boundary with Magowar Road
- Western Boundary with Lot 6 DP237436

A summary of site details are provided in **Table 3-1**.

Table 3-1: Summary of Site Details

Location	123 Magowar Road, Girraween - Lot 2 DP545501
Approximate Land Dimensions	Northern Boundary: 48 m Eastern Boundary: 82 m Southern Boundary: 24 m Western Boundary: 82 m combined
Approximate Total Area	Approximately 0.225 hectares or 2,251 m ²
Grid Reference (GDA94 – MGA56) Zone 56	Middle of Site = Easting: 309692 Northing: 6257970 Elevation: 58 Street Address = Easting: 309682 Northing: 6257934 Elevation: 56
Driveway	Existing Driveway = length: 72 m (from street to front end of rear building and width: 8 m
Local Government Area	Cumberland Council
Existing Land Use	The environment of the site and surrounding properties is general industry with several activities such as a chicken wholesaler, an automotive distribution centre, a property group and other similar activities. Girraween High School is North of the property
Current Zoning	IN2 – Light Industrial
Proposed Development	The establishment of a small Resource Recovery facility

3.3 SURROUNDING DEVELOPMENT

Land use in the surrounding area comprises of a mix of commercial and industrial activities within the IN2 zone. **Figure 3-4** shows the closest residential dwellings within adjacent residential zones and the Girraween High School.

3.4 EXISTING DEVELOPMENT

Currently, the site is used for the storage of mostly empty skip bins that are used to transfer construction and demolition waste from different locations within Sydney Metropolitan Area to lawfully approved facilities for recycling and/or landfilling. Currently, there are no other activities undertaken within the site. We understand that the site may have been previously used as materials storage facility. The main building has been previously used by previous occupants for the above mentioned activities. The intended use of the building is for the storage of materials and the resource recovery activities as described in the proposed activities section. A section of the building will also be used to store a small quantity of spare parts and tools for the machinery proposed to be used on site. The building will also be used for undertaking minor maintenance and service works on these machineries.

There will be a no change to the existing use of the site from industrial, but we believe that there will be improvement to the presentation/aesthetics of the site and safety of people working on site, especially when the accessible areas are upgraded to higher standards.

3.5 TOPOGRAPHY AND DRAINAGE

A comprehensive topographical survey was undertaken by very experienced Registered Land and Engineering Surveyors. The survey included all site features such as the building, the utilities visible to the surveyor, the natural surface levels, existing driveway and natural surface contours. The survey also included the accurate dimensions of the site boundaries. Site layouts and plans prepared by Claron Consulting were based on the topographical survey to better illustrate the contouring of the site.

3.5.1 Existing and Proposed Drainage

Based on the information obtained from the current landlords, the topographical survey and the observations made during site inspections, we confirm that, due to the location and topography of the site, it is connected to Council's stormwater system and Sydney Water's sewer. The existing drainage system that has been previously used will not change for the outside area as it will remain clean at all times since all loading, unloading and recycling activities will be undertaken inside the building which is fully isolated from the outside area.

Since the existing buildings and other structures will be retained, there will be no changes to current drainage arrangements in relation to both roof water and sewer. In relation to the

proposed outside areas, it is proposed that water runoff from all clean areas be diverted away from the potentially non-clean areas within the building footprint. Similarly, any potential water runoff from non-clean areas will be diverted away from the clean areas. This water will be collected in an underground collection pit which is located inside the building as well and subsequently pumped out to a liquid waste treatment facility, if it is not used on site for dust suppression..

Similarly for the roof water, existing drainage system will be used. Hence, no change to current rainwater/potable water is required.

All existing stormwater management systems, including diversion drains and speed humps, will be maintained after the development is completed in the same and even better manner as they have been maintained before the development to ensure that the quality of clean water is even better than before. If required, any additional amenities will be connected to the existing services as per the existing infrastructures. In this case, the applicant will seek advice from Council on this matter.

An illustration of the surface water management is shown in **Figure 6-2**. It is clearly evident that the surface water flow will not be altered negatively but rather positively after the development.

3.6 POTENTIALLY SENSITIVE RECEPTORS – RESIDENTIAL ZONED AREAS

As previously stated, the site is located within an industrial zone and therefore the activities are well shielded from the surrounding environment by the existing built environment such as the topography of the site, the enclosed building where most activities will be conducted and the large industrial/commercial facilities along Magowar Road. The large industrial buildings located to the east, south and west of the subject site provide an excellent noise reduction and visual shield between the site and the closest residents. We believe that the neighbouring buildings provide adequate shielding for all potential impacts from the activities conducted on site.

Based on the EPA's document "*NSW DEC (EPA) Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales – August 2005*", the following definition of sensitive receptor is provided: "**Sensitive receptor** A location where people are likely to work or reside; this may include a dwelling, school, hospital, office or public recreational area."

Based on our preliminary assessment during the inspections, the activities proposed to be conducted on the site will not and are unlikely to have any adverse impact on any sensitive receptor for many reasons including the distance between the source and receiver, the industrial/commercial buildings and the fact that any potentially noisy activities will be undertaken during normal day time business hours.

The closest potentially sensitive receptors were identified as part of the Noise Impact Assessment and are included below courtesy to Benbow Environmental.

Section 5 of this document includes more details about the zoning associated with the site and surrounding areas.

The closest residential zoned areas to the site are included in **Figure 3-4**.

Figure 3-4: Location of closest residential areas relative to the site



Source: NSW Land and Property Information - SixMaps

4. OPERATIONS OVERVIEW

4.1 PROPOSED ACTIVITIES

RPG Demolition's main activities are summarised below:

- Full back-to-base strip outs - RPG's core work is based around high-rise strip outs throughout the Sydney CBD, metro and interstate.
- Detailed partial strip outs - from tea rooms to bathroom refits.
- Structural demolition - Including stair penetrations, load bearing walls and beams.
- Saw cutting of concrete and masonry.
- Rubbish removal from commercial premises (non-putrescible).
- Skip bin services

Currently RPG sends all demolition waste from its business activities to licenced landfills and other approved resource recovery facilities. By having the benefit of its own premises to undertake these activities RPG will be able to significantly increase the amount of C & D waste material recovered and diverted from landfill.

The proposed facility will operate within the existing industrial shed. All operations and storage will be undertaken wholly within the building, including the unloading and loading of trucks.

The facility would receive dry, inert C&D waste. It is not intended to receive asbestos, hazardous liquid, putrescible, industrial or special waste.

The plant and equipment proposed to be used at the facility would comprise:

The anticipated materials to be recovered include concrete, wood, metals, glass, plasterboard, masonry, soils, rubble, fibres, non-putrescible organics and plastics.

Residual materials which are unable to be recovered would be sent to a licensed landfill.

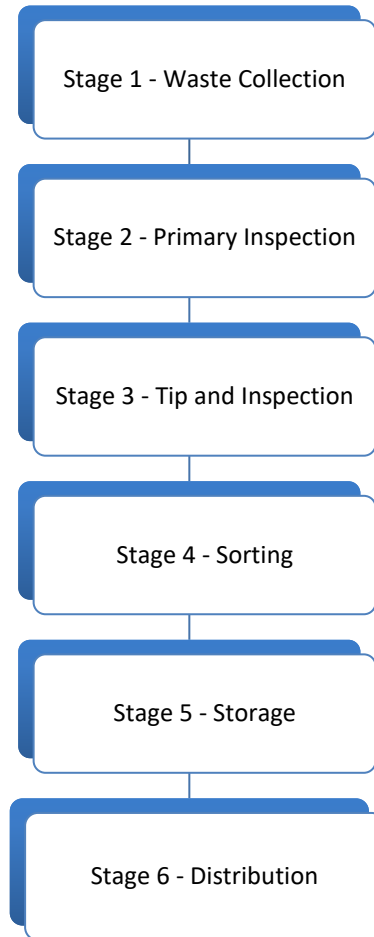
4.1.1 Waste Management Processes

The processing of C&D waste would be undertaken in six stages (**Error! Reference source not found.**):

- Collection;
- Primary inspection (prior to unloading);
- Tip and inspection;
- Sorting;
- Storage; and
- Distribution (sale of resources and disposal of residuals).

The stages have been developed with referral to the Draft *Standards for Managing Construction Waste in NSW*, with the aim of increasing efficiencies to reduce the potential for load contamination and increase the amount of material that can be recycled.

Figure 4-1: Stages of the proposed activities



4.1.2 Finished Goods/Materials

Most of the finished products are chemically and physically identical to the materials prior to being received on site with the difference being that the materials are now sorted into several stockpiles in accordance with their types. However, the finished products are all the same; they are simply screened to the required size.

5. STATUTORY REQUIREMENTS

The key NSW statutory requirements relevant to this EMP are divided into two (2) categories; Planning and Environmental & Safety as outlined in this Section of the EMP.

It is important for staff and contractors to be aware of the legislative and regulatory requirements related to the operation phase of the development and their corresponding responsibilities.

This section presents a summary of relevant environmental legislation and its objectives as well as the current zoning of the area where the site is located. More detailed information is provided in the SEE submitted with the Development Application.

5.1 PLANNING

The “*Guideline for the Preparation of Environmental Management Plans*” prepared by the Department of Infrastructure, Planning and Natural Resources provides guidance in preparing Environmental Management Plans (in this case it is a specific Environmental Management Plan) to be submitted to Cumberland Council. Other planning instruments are outlined below. However, these are fully addressed in the SEE.

5.1.1 Holroyd Local Environmental Plan 2013

The matters related to this LEP are addressed in the main SEE and should not be repeated in this document. However, we have included some relevant information associated with the zoning to ensure that any potential impacts on potentially sensitive residential premises are addressed in this EMP.

5.1.2 Holroyd Development Control Plan 2013

The matters related to this DCP are addressed in the main SEE and should not be repeated in this document.

As previously stated the site is located within the zone **IN2 – Light Industrial** under the current Holroyd Local Environmental Plan 2013 (HLEP 2013).

5.2 ZONING

As previously stated, the subject site is also known as Lot 2 DP545501 which is approximately 0.225 Hectares in area and is currently zoned as IN2 – Light Industrial under Holroyd Local Environmental Plan 2013 (HLEP 2013). The objectives of that zone, the activities permitted with or without Consent and those that are prohibited, are included in this section.

Figure 5-1 presents the location of the site in the Cumberland Council Area to provide the reviewer with a better understanding of its location in Council context.

Figure 5-2 presents the location of the site in the **IN2 Zone – Light Industrial** as depicted in zoning maps included in the HLEP.

Figure 5-3 presents a closer view of the location of the site in the **IN2 Zone – Light Industrial** as depicted in zoning maps included in the HLEP.

Zone IN2 Light Industrial

1 Objectives of zone

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.
- To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.
- To minimise adverse impacts on the natural environment.

2 Permitted without consent

Nil

3 Permitted with consent

Depots; Food and drink premises; Garden centres; Hardware and building supplies; Industrial training facilities; Kiosks; Landscaping material supplies; Light industries; Neighbourhood shops; Places of public worship; Plant nurseries ; Roads; Timber yards; Warehouse or distribution centres; Any other development not specified in item 2 or 4

4 Prohibited

Agriculture; Air transport facilities; Air strips; Amusement centres; Animal boarding or training establishments; Biosolids treatment facilities; Boat launching ramps; Boat sheds; Camping grounds; Car parks; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Correctional centres; Crematoria; Eco -tourist facilities; Educational establishments; Electricity generating works; Entertainment facilities; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Function centres; Health services facilities; Heavy industrial storage establishments; Helipads; Highway service centres; Home businesses; Home industries; Home occupations; Home occupations (sex services); Industries; Information and education facilities; Jetties; Marinas; Mooring pens; Mooring s; Mortuaries; Open cut mining; Recreation facilities (major); Research stations; Residential accommodation; Restricted premises; Rural industries; Sewage treatment plants; Sex services

premises; Tourist and visitor accommodation; Vehicle body repair workshops; Veterinary hospitals; Waste disposal facilities; Water recreation structures; Water recycling facilities; Water supply systems; Wharf or boating facilities

Based on the above, resource recovery facility is permitted in this zone with Development Consent.

Figure 5-1: Site Location in the Cumberland Council Area

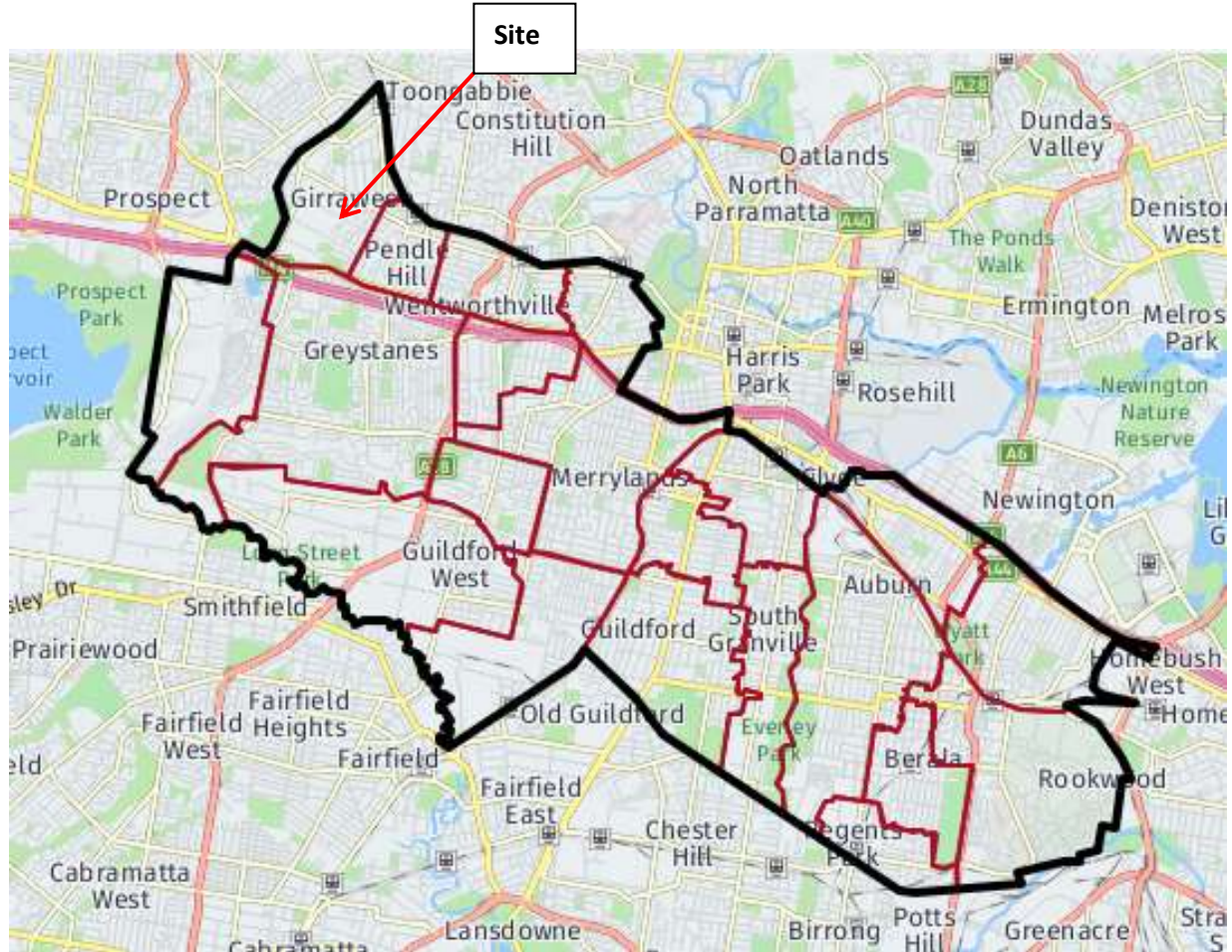


Figure 5-2: Site location in the IN2 Zone – Light Industrial

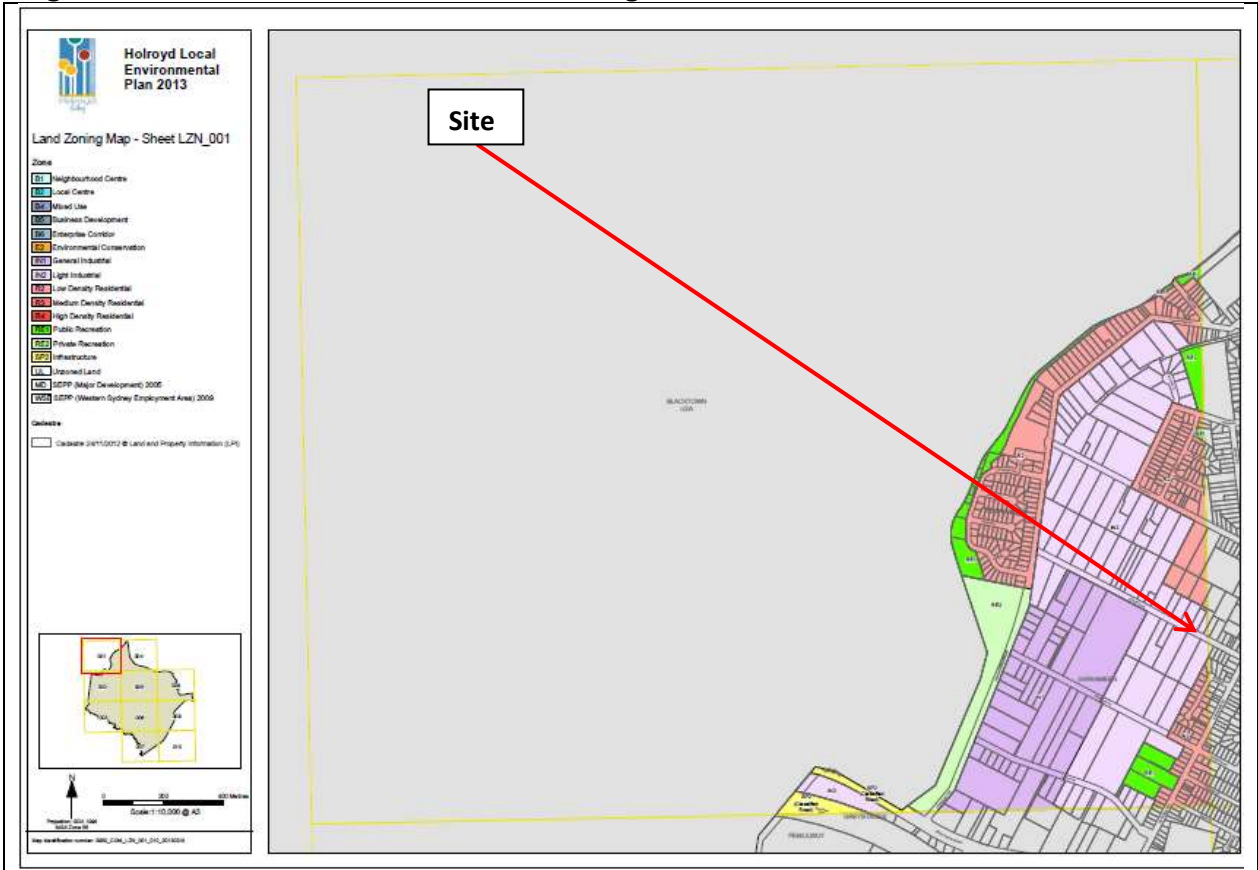


Figure 5-3: Site location in the IN2 Zone – Light Industrial – Closer View



5.2.1 Development Consent

At this stage, there is no development consent for the proposed activities since a Development Application will be lodged with Cumberland Council shortly after the compilation of all relevant documents including this EMP. However, when the application is approved, this EMP may need to be reviewed to ensure that all requirements included in the consent are addressed.

5.3 ENVIRONMENTAL AND SAFETY

5.3.1 Environment Protection Licence

At this stage and based on the quantities of materials stored and/or processed on site an Environment Protection Licence (licence) from the NSW Environment Protection Authority (EPA) will not be required.

Table 5-1 includes a list of environmental and safety legislation that are relevant to the proposed activities.

Table 5-1: Environmental and Safety Requirements

Act / Regulation	Regulatory Authority	Relevance to Project
Work, Health and Safety Act, 2011	SafeWork NSW	Regulates workplace safety
Work, Health and Safety Regulation 2011	SafeWork NSW	Regulates workplace safety
Water Management Act, 2000	NSW Office of Water	Management of water resources such encroachment on waterways and wetlands
Waste Avoidance & Resource Recovery Act 2001	EPA	Promotes recycling and re-using of materials
Protection of the Environment Operations Act 1997	EPA, Cumberland Council	Provides licences and enforces water pollution etc.

5.3.2 Protection of the Environment Operations Act 1997

In an attempt to simplify the legislation, the principal objective of this legislation is to avoid causing harm to those situated within proximity of the site. For the purpose of this plan, harm can be caused by air, water or noise pollution as per the following extracts from the Act:

“Air pollution” means the emission into the air of any air impurity. While “air impurity” includes smoke, dust (including fly ash), cinders, solid particles of any kind, gases, fumes, mists odours, and radioactive substances.

The following clauses of this Act have most relevance to RPG Demolition site:

Clause 126 Dealing with materials

(1) The occupier of any premises who deals with materials in or on those premises in such a manner as to cause air pollution from those premises is guilty of an offence if the air pollution so caused, or any part of the air pollution so caused, is caused by the occupier’s failure to deal with those materials in a proper and efficient manner.

(2) In this section:

deal with materials means process, handle, move, store or dispose of the materials.

materials include raw materials, materials in the process of manufacture, manufactured materials, by-products or waste materials.

Clause 127 Proof of causing pollution

To prove that air pollution was caused from premises, within the meaning of sections 124 – 126, it is sufficient to prove that air pollution was caused on the premises, unless the defendant satisfies the court that the air pollution did not cause air pollution outside the premises.

- **Clause 128 Standards of air impurities not to be exceeded**

(1) The occupier of any premises must not carry on any activity, or operate any plant, in or on the premises in such a manner as to cause or permit the emission at any point specified in or determined in accordance with the regulations of air impurities in excess of:

(a) the standard of concentration and the rate, or

(b) the standard of concentration or the rate.

prescribed by the regulations in respect of any such activity or any such plant.

(2) Where neither such a standard nor rate has been so prescribed, the occupier of any premises must carry on any activity, or operate any plant, in or on the premises by such practicable means as may be necessary to prevent or minimise air pollution.

(3) A person who contravenes this section is guilty of an offence.

"noise pollution" means the emission of offensive noise.

"offensive noise" means noise:

(a) that, by reason of its level, nature, character or quality, or the time at which it is made, or any other circumstances:

(i) is harmful to (or is likely to be harmful to) a person who is outside the premises from which it is emitted, or

(ii) interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted, or

(b) that is of a level, nature, character or quality prescribed by the regulations or that is made at a time, or in other circumstances, prescribed by the regulations.

120 Prohibition of pollution of waters

(1) A person who pollutes any waters is guilty of an offence. An offence against

subsection (1) committed by a corporation is an offence attracting special executive liability for a director or other person involved in the management of the corporation-- see section 169.

(2) In this section: "pollute" waters includes cause or permit any waters to be polluted.

5.3.3 Water Management Act, 2000

Based on our understanding of the requirements of the Department of Primary industries'-Office of Water (DPI-Water), the proposed development and any subsequent modifications/additions/alterations to the development do not require a controlled activity approval under the Water Management Act 2000 (WMAAct).

The three (3) main reasons are:

1. The proposed activities do not encroach on any waterways,
2. No activities will be undertaken within 40 m of any waterway, and
3. No waterways are likely to be affected by the proposed activities.

5.3.4 Waste Avoidance and Resource Recovery Act, 2001

This Act relates to the efficient use of resources, resource recovery, including reuse and recycling and continual reduction of the disposal of waste.

This act is of relevance to the site in relation to segregation of different types of wastes and maximising the reuse and recycling of waste materials.

The primary objectives of the act in relation to site activities are:

1. To encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of ecologically sustainable development;
2. To provide for the continual reduction in waste generation;
3. To minimise the consumption of natural resources and the final disposal of waste by encouraging the avoidance of waste and the reuse and recycling of waste; and
4. To establish a hierarchy of resource management options:
 - *Avoidance of unnecessary resource consumptions;*
 - *Resource recovery (including reuse, reprocessing, recycling and energy recovery);*
 - *Disposal.*

The proposed activities are consistent with the objectives of this Act.

5.3.5 Work Health and Safety Act 2011

The Work Health and Safety Act 2011 and associated regulation provide requirements for the storage and handling of dangerous goods amongst many other aspects. There would be minor quantities of dangerous goods (fuels and oils) stored at the site that would not warrant the need for notification to SafeWork NSW.

Should larger quantities of dangerous goods be required to be stored or handled at the site, this legislation would need to be consulted to determine requirements.

5.4 POLICIES/GUIDELINES

The most relevant policies and guidelines are those included in the reference Section of this document. However, it was considered important to list some more relevant documents in **Table 5-2** to provide the reader with additional documents that were referred to during the preparation of this EMP.

Table 5-2: Codes of Practice, Standards and Guidelines

Document Name	Regulatory Authority	Relevance to Project
Managing Urban Stormwater: Soils and Construction	EPA	Erosion and sediment controls
Environmental Guidelines: Waste Classification Guidelines	EPA	Disposal and management of waste
Noise Policy for Industries – 2017	EPA	Control of noise

5.5 RELATED DOCUMENTATION

The documents related to the proposed activities are listed in **Table 5-3** below.

Table 5-3: Specific Documents Related to the Proposed Activities

Document Name	Author	Relevance
Statement of Environmental Effects	Claron Consulting Pty Ltd	Locations of proposed activities – potential environmental impacts
Traffic Management Plans (Internal and External)	Claron Consulting Pty Ltd	Internal and external management of traffic entering and exiting the site
Site Plan and Site Analysis	Claron Consulting Pty Ltd	Plan showing location of all structures and facilities

5.6 STATUTORY APPROVALS APPLICABLE TO THE DEVELOPMENT

All proposed activities should be undertaken with the appropriate regulatory approvals, or permits in place and shall comply with applicable environmental regulatory and legislative requirements.

The approvals which could be required prior to commencement of activities on site are listed in **Table 5-4**.

Table 5-4: Development Specific Approvals

Licence / Permit / Approval	Regulatory Authority	Purpose
Development Consent	Cumberland Council	Permission to undertake the proposed activities
Environment Protection Licence ¹	Environment Protection Authority	Permission to undertake the proposed activities

¹ Environment Protection Licence will only be required if relevant thresholds of waste processing or waste storage as specified in the POEO Act are likely to be exceeded

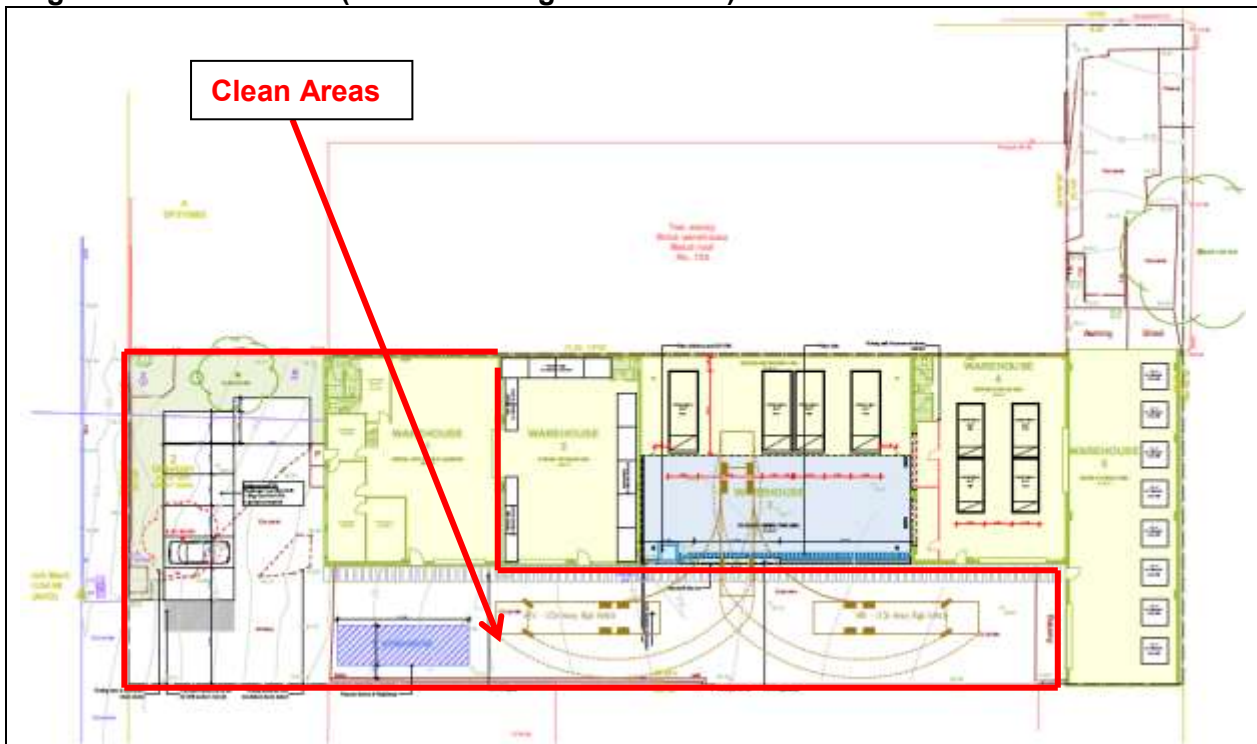
6. RELEVANT MANAGEMENT PLANS AND MONITORING PROGRAMS

To reduce the potential of impacts on human health and the environment, it was considered appropriate to divide the site into two main areas; a clean area and non-clean area. This will assist greatly the operator to maintain very good control of all potential impact.

Figure 6-1 shows the clean areas where none of the proposed activities will be undertaken. This area is totally isolated from the remainder of the site.

The non-clean area is either within the building or undercover where all materials storage and processing will be undertaken. These areas are segregated from the clean area with appropriate bunds, diversion drains and a collection pit as described in the surface water management plan.

Figure 6-1: Clean Area (No Processing of Materials)



For the operation phase, the management plans and monitoring programs outlined below will be implemented.

6.1 MANAGEMENT PLANS

Most Management Plans for the operation phase were previously included in the SEE. The following Sections will include relevant information to assist the reader in either referring to the relevant document or to use the information included in this EMP.

6.1.1 Air Quality Management Plan

6.1.1.1 Dust

Due to the fact that all potentially dust generating activities such as unloading, processing and loading of materials will be undertaken within the enclosed building or other enclosed structures, the potential for dust generated from these activities to leave the site is very low to none.

Normal dust mitigation measures will be installed on site and made available at all times during normal operations. These include the provision of sprinklers, water hoses and sprayers. In addition, high efficiency dust control techniques will be employed on site to prevent the emission of dust from the site.

Notwithstanding the above, it was considered appropriate to install additional mitigation measures to ensure that under extreme adverse weather conditions, the objectives of nil dust leaving the site will be maintained. These additional measures include the installation of two (2) misters at the entry point to the unloading area that will be activated automatically by motion sensors to avoid human errors. These misters will activate as the truck is reversing into the unloading area to empty its load. For that area additional dust curtains could also be installed to provide all stakeholders with more confidence that no dust will be visible or leave the site.

The following specific mitigation measures will be implemented on site to assist in reducing the generation of dust from the proposed activities:

- All vehicles travelling within the boundaries of the site must not travel faster than 20 km/h at any time other than in emergency situations only,
- All materials would be transported in covered loads,
- Daily cleaning of trafficable areas by using a road sweeper,
- Regular inspections of the external areas to ensure that transfer of dust from the active working areas to other areas is minimised,
- Regular cleaning of areas where waste materials are stored especially after every occurrence of transporting these materials off site,
- Conduct regular inspections as part of the worksite inspections to confirm or otherwise that this cleaning regime is efficient and sufficient in reducing the quantity of dust on the ground,
- All reasonable measures are employed at the site to prevent dust emissions beyond the boundary of the premises,
- Awareness training to educate employees and contractors about the sources and impacts of dust emissions from the proposed activities, as well as identifying work practices that minimise dust generation. Information relating to dust emissions and controls is incorporated in the environmental training and induction for all staff and contractors,

- Preventative maintenance refers to the regular maintenance of systems associated with site's activities to ensure breakdowns are prevented or minimised and to ensure the efficient operation of all systems. A program should be put in place to ensure preventative maintenance is undertaken according to manufacturers' specifications. The maintenance of this equipment is an integral part of the process of minimising the impact on the environment,
- Site entrance and site access roads will be well maintained and either swept or watered if required;
- Removal of non-recyclable materials of site on a regular basis to ensure that any organic, or similar materials, if any left, do not have sufficient times to decompose and subsequently may generate air emissions;
- All non-recyclable materials must be kept on sealed, or inside specifically dedicated enclosed containers to prevent interaction with other materials which may lead to the accumulation of odorous materials in these areas. This may have cumulative effect on dust, and

Several mitigation measures have been included in this EMP to assist in reducing dust generation and dust movements in the external surfaces of the site as a result of the proposed activities. RPG Demolition management is confident that all relevant NSW legislation and guidelines will be complied with, provided that the site management continues on implementing these mitigation measures.

6.1.1.2 Odour

As previously stated, due to the nature of the materials received and processed on site which is of non-putrescible nature, and the dry nature of the storage activities, odours are not expected to be present on site. This was confirmed during the voluntary audit recently undertaken on the applicant's existing site. It is understood from the applicant that a screening procedure is undertaken on each load entering the site and prior to being unloaded to check for materials that are not permitted to enter the site including odorous materials and in particular putrescible matters. This procedure is strictly adhered to and supervised by the site manager. This procedure should assist in reducing the potential for odour generation on site. Any loads brought onto site that contains putrescible material or presents a noticeable odour will not be accepted onto site. Non-conforming loads will be immediately sent to landfill.

6.1.1.3 General Housekeeping

The site is required to be kept clean at all times, in order to prevent issues with build-up of dust residues within the vicinity of the active working areas and on any surfaces where dust is likely to be generated and/or accumulated.

Hence, daily cleaning will be implemented and has been committed by site management. Additionally, monthly inspections are carried out to identify housekeeping related problems.

6.1.2 Noise Management Plan

During the operating hours to be specified by Cumberland Council (Council), RPG Demolition will comply with the noise criteria specified in the EPA's Noise Policy for Industry 2017 (NPfI) unless Council specifies other criteria that are considered more applicable and relevant to the subject site and area.

Based on the brief noise assessment undertaken at RPG Demolition existing site, it is clearly evident that the proposed activities comply with the EPA's NPfI without the implementation of any specific noise mitigation measures. However, for this site the fact that all relevant activities will be undertaken within an enclosed building and other enclosed structures, and the presence of over 5m high concrete walls around the perimeter of most of the site where potentially noise generating activities may occur, it is anticipated that the noise criteria will be easily comply with. However, if verification of compliance with the criteria will be required, the applicant will engage suitably qualified environmental consultants to undertake attended noise measurements during the normal operations of the site to demonstrate that the noise criteria are complied with.

We believe that the noise emanating from the proposed activities could be further controlled by implementing the following measures:

- Restrict operations to approved times only;
- All vehicles travelling within the boundaries of the site must not travel faster than 20 km/h at any time other than in emergency situations only;
- Maintain and use all mobile plant and machinery correctly;
- Equipment and vehicles used during the works will be maintained to ensure that noise levels generated as a result of the proposed activities will be as minimal as possible
- Ensure all vehicles accessing the site use designated access roadways; and
- Investigate any noise complaints, inquiries or feedback.

6.1.3 Landscape and Vegetation Management Plan

As previously stated, most of the site is 100% sealed with thick concrete layer. Hence, there is an option for a small space for landscaping or vegetation plan to be implemented on this site. However, we believe that Council will be better placed to make a determination on this matter and we look forward to receive Council's advice on this matter.

6.1.4 Stormwater and Groundwater

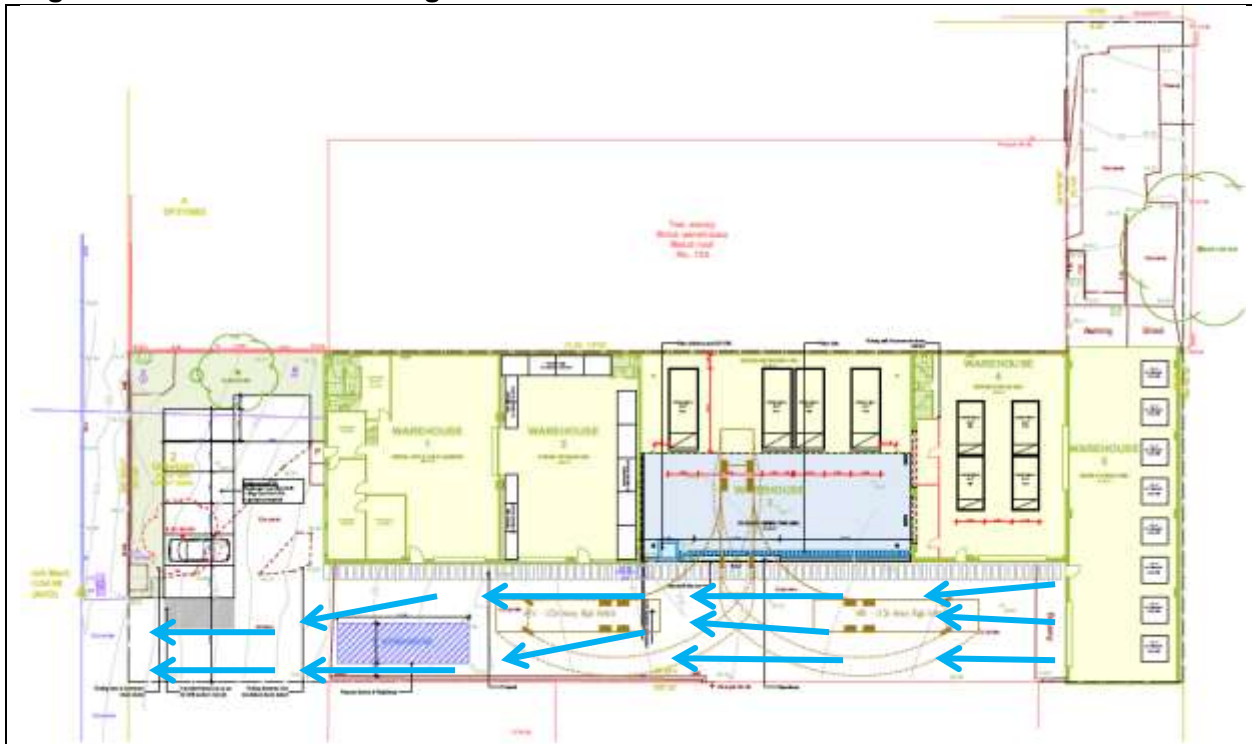
As previously stated most of the site of the site is considered to be impervious to prevent any stormwater pollution as well as land/soil and subsequently groundwater contamination.

Based on the observations made during the inspections of the proposed site, we have managed to confirm the applicant's advice on the flow of stormwater on site. **Figure 6-2** presents our understanding of the surface water flow for the clean area of the site. We believe that these measures are sufficient and efficient in protecting the receiving environment without compromising the day to day operations of the site. In summary, all stormwater from the clean area along the driveway is diverted away from the main building via existing topography and speed humps, and it is discharged to stormwater. Furthermore, it appears that this has been the practice for years on that site except the fact that additional measures are now in place to prevent the water runoff from the clean areas from entering the enclosed and roofed active working areas. Due to the fact that the whole site is cleaned regularly and no processing activities will be undertaken outside the enclosed structures, it is anticipated that no sediments are likely to end up in the stormwater system. However, it is recommended that RPG Demolition management undertakes regular inspections of the driveway area in case sediments are accumulating. These sediments should be removed and disposed of appropriately to ensure that the stormwater system is not polluted.

In relation to potential impact of the activities on groundwater, we believe that the activities have no impact or potential impact on groundwater since most of the site is made of impervious materials, no activities are undertaken in or below ground and no activities have the potential of contamination.

In addition to the above stormwater management practices, the site and part of Magowar Road along the whole frontage of the proposed site will also be cleaned on a regular basis (at least once every day or more often under severe adverse weather conditions) by a road sweeper to remove all dust, litter, debris and other fine materials that cannot be removed by the large machinery used on site.

Figure 6-2: Stormwater Management Plan for the Site



We understand that these measures have been used by many similar activities in many areas and found that Councils were satisfied that these measures are sufficient and efficient in protecting the receiving environment without compromising the day to day operations of the site.

6.1.5 Traffic Management

The proposed traffic management associated with the activities to be conducted on site was considered during the site inspection and environmental audit. This traffic management was also confirmed by the site manager as being the best approach based on environmental, work health & safety and for operational reasons.

We believe that all vehicles should enter and leave the site in a forward direction which is the best traffic management practice currently required by Government Authorities. **Figure 6-3** illustrates the proposed external traffic management to be implemented on site. For traffic arrangements within the site, reference should be made to the Traffic Impact Assessment and site plans.

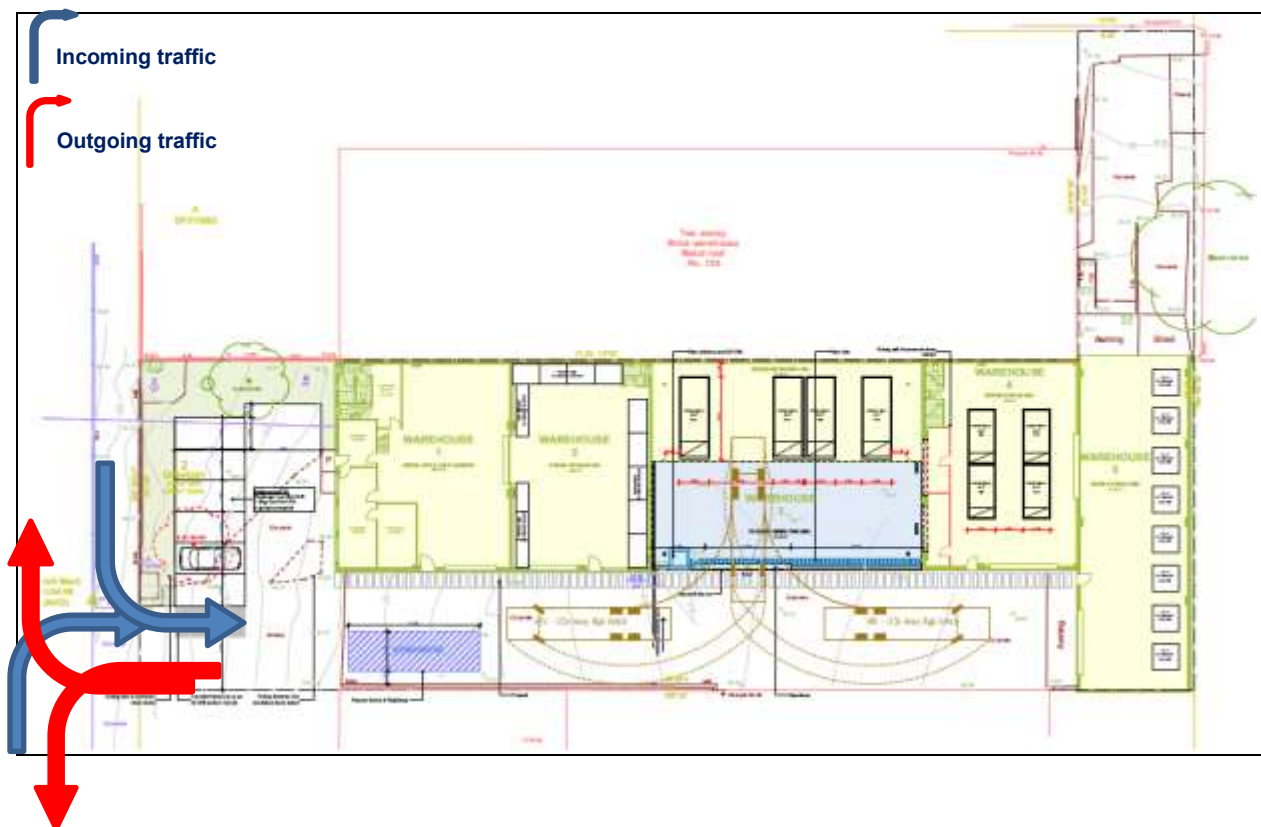
We have been advised that the applicant will review its traffic management on and off site within six months after commencement of normal operations as part of its continual operational improvements to ensure that feedback received from employees and customers is taken into consideration.

It should also be noted that the speed limit of 20 km/h would be imposed on all vehicles moving within the site.

In summary:

- All vehicles traffic enter the site via the main single entry/exit driveway of Magowar Road by making a right turn (approximately 90°) if they are heading west and a left turn (approximately 90°) if they are heading east,
- Most vehicles continue in a straight direction towards the rear of the site after travelling on the proposed weighbridge mainly to empty their loads after reversing towards the main building (waste processing area),
- All vehicles also leave the site in a forward direction via the single entry/exit driveway by making either a right turn into Magowar Road heading west or a left turn into Magowar Road heading east.

Figure 6-3: Traffic Management Plan for the Site (External)



6.1.6 Waste Management Plan

The Waste Management Plan includes two (2) stages; the construction stage and operational stage. Therefore, it was considered appropriate to prepare two (2) separate Waste Management Plans. Furthermore, and to support the waste management plans, we considered it appropriate that, in addition to Council's completed standard forms, further information is necessary to demonstrate the applicants' dedication to waste management.

6.1.6.1 Waste Management Plan for the Construction Stage

Since no demolition or construction works will be necessary as part of this development but rather some minor repairs to existing structures to improve the working environment from a health and safety prospective. A comprehensive waste management plan for construction will not be required.

However, just in case during the repair works some small quantities of waste materials may generated, this waste will be limited to some small pieces of metal, screws, bolts, left-overs including packaging products such as plastics and cardboard, etc..... This waste will be managed and removed off site by the installer/contractor as part of the contractual arrangements.

6.1.6.2 Waste Management Plan for the Operational Stage

Since the site is mainly used for the receiving and storing waste materials, it is clearly evident that waste management is one of the applicants' top priorities to ensure that materials received are not mixed with waste generated from their (and their employees at a later stage) everyday activities during normal duties. The waste generated on site is separated into domestic putrescible, domestic non-putrescible and possibly commercial non-putrescible solid waste.

The putrescible waste is mainly made up of very small quantities of food scraps, tissues, etc.... This waste is placed in a separate bin and collected by the weekly Council (or contractor) garbage collection run.

The domestic non-putrescible waste is mainly made up of office left-overs, papers, cardboard boxes, empty tissue boxes, empty aluminium cans, plastic bottles, glass jars, etc. These will be placed in the recyclable bins to be collected by weekly (or fortnightly) Council (or contractor) recyclable collection runs.

The commercial waste is generated from the packaging of products stored and used on site and other by-products from the use of certain products such as potentially oil contaminated cardboard boxes, dirty rags, plastics, empty containers, etc..... This waste is placed in a dedicated mini skip that is collected and replaced by a licensed waste transporter on a monthly basis.

Since all major machinery servicing and maintenance are undertaken by professional mechanical companies, it is not anticipated that any machinery related waste will be generated on site.

Other than the above waste, no other waste materials will be generated on site that may require transporting directly to licensed landfills due to the fact that all materials received on site are considered to be finished products and no further processing is required.

Due to the fact that the site is not connected to Council's sewer, the amenities of the site are and will continue to be serviced by the existing septic tank due to the nature and location of the site. The septic tank will be emptied by an appropriately licensed company on a regular basis.

6.1.7 Chemical Storage

We understand that only small quantities of oil and grease would be stored within the workshop building for minor services and maintenance of the company's machineries and vehicles. In addition to the small quantities of chemicals, there will be no other chemicals including fuel stored on site. Due to the fact that only small quantities of dangerous goods but not hazardous materials are used on site, no placarding or notification to SafeWork NSW is required. These chemicals are stored in a specially designed area which is well away from any potential accident or incident that may cause spills or leaks from these containers and are located away from trafficable areas.

The applicant has confirmed that the site now contains a comprehensive spill kit which is located in close proximity to the location of the small quantities of oil within the workshop area to ensure that any spills could be easily and promptly contained and cleaned appropriately.

6.2 MONITORING PROGRAMS

Based on our extensive experience with environmental assessments of similar activities and the brief environmental assessment undertaken at RPG Demolition existing activities, we believe that the potential of impact on the environment and human health is minimal. We believe that specific monitoring programs are not warranted since all proposed activities other than vehicular traffic will be undertaken in enclosed spaces. Furthermore, the proposed small number of vehicle movements for the proposal compared with the current number of vehicles, including a high percentage of heavy vehicles, using Magowar Road will have very little, if any, increase in traffic noise, dust emissions or exhaust gas emissions.

Notwithstanding the above, monitoring programs could be conducted when required only following an inquiry, a feedback or a complaint. These could be initiated by RPG Demolition staff, contractors, community and/or authorities.

6.2.1 Dust Monitoring Program

RPG Demolition management is confident that its activities will easily comply with any proposed relevant consent conditions based on the preliminary assessments and observations made during the voluntary environmental audit recently undertaken by highly qualified environmental engineer. The assessment showed that implementing and maintaining the recommended mitigation measures would be sufficient for the proposed activities to comply with all Council (and EPA) air quality criteria at all times.

The potential dust emission impacts on residential areas within the vicinity of the subject site are insignificant due to the distances between the site and residential areas, topography of the area and the minimal potential dust emissions from the proposed activities beyond the boundaries of the subject site.

The location/s of dust monitoring, if required, should be determined in consultation between Council, RPG Demolition and the environmental consultant.

6.2.2 Noise Monitoring Program

As previously stated we do not believe that a formal noise monitoring program is warranted but rather similar arrangements with the dust monitoring program are implemented, when required.

The potential noise impacts on residential areas within the vicinity of the subject site are insignificant due to the distances between the site and residential areas, topography of the area and the noise generated from existing industrial activities and traffic noise located between the subject site and residential areas.

The location/s of noise monitoring, if required, should be determined in consultation between Council, RPG Demolition and the environmental consultant.

6.2.3 Stormwater Monitoring Program

As previously stated, the site will be separated into two main areas from stormwater point of view; a clean area where no waste related activities will be undertaken and a non-clean area where all proposed activities will be undertaken. For the clean area, only clean stormwater will be flowing within that area and will be discharged into the existing stormwater system as it has been the case for many years. For the non-clean areas, the water including any other impurities will be collected in a collection pit and then used on site for dust suppression.

Based on the above and other information provided in this EMP as well as the SEE, it is clearly evident that regular stormwater monitoring program is not warranted.

7. ENVIRONMENTAL MANAGEMENT PRACTICES AND PROCEDURES

As previously presented in this report, the potential environmental impacts of the operation activities are very minimal and will be limited to potential dust, noise and stormwater aspects only. Hence, in addition to the mitigation measures, amelioration strategies, protocols, regimes and monitoring requirements included in this EMP, it is considered appropriate that two (2) additional procedures be prepared and implemented by relevant RPG Demolition staff. These two procedures would form a vital component of the Construction Environmental Management Plan (EMP) for the site.

This EMP and the procedures it contains are designed to help staff and contractors carry out activities in the following ways:

- Provide prescriptive procedures where appropriate to minimise potential dust and noise nuisance and/or potential harm to human health and the environment;
- Provide guidelines for staff and contractors to enable them to assess and implement the best strategy to minimise potential dust, noise and stormwater impacts; and
- Increase Construction related environmental awareness for the management, staff, contractors and visitors to the site.

The following procedures also assist management in the following ways:

- Identify events which have the potential to increase the risk of statutory breaches arising from dust, noise or stormwater pollution incidents, or to cause significant business interruptions;
- Provide guidelines for minimising the potential for dust, noise and stormwater impacts; and
- Establish, equip and train the staff and contractors that management can rely on with the capability of dealing with anticipated events effectively and efficiently.

The two additional Management Procedures that are considered appropriate for inclusion in this EMP are:

1. Workplace Inspection Procedure, and
2. Complaint Management Procedure.

These procedures are included in **Attachment 1**.

8. MONITORING OF ENVIRONMENTAL PERFORMANCE OF THE PROPOSED ACTIVITIES

All proposed activities will be monitored by implementing several strategies on the site. These strategies include:

- ❖ Workplace inspections conducted in accordance with the relevant procedure included in **Attachment 1** of this document;
- ❖ On-going program to record any detection of excessive dust emissions, water pollution, noise emissions by staff, visitors or contractors;
- ❖ On-going program to record any enquiries or requests by authorised officers of Government Departments;
- ❖ On-going program to record any enquiries, complaints or feedback from the community residing or present nearby;
- ❖ Regular workplace audits/inspections by RPG Demolition delegated employees within the boundaries of the site;
- ❖ Regular walkabouts outside the boundaries of the site by RPG Demolition delegated employees;
- ❖ Review the results of any environmental monitoring undertaken as a result of concerns expressed by the community, authorities or others,
- ❖ Regular meetings and informal discussions with staff from both RPG Demolition and the contracting companies to gauge whether there are any environmental issues associated with the activities that are of concern to any person; and
- ❖ Review of all enquiries, feedback and complaints received from all stakeholders including staff members and contractors to ensure that any issues arise from the activities that are likely to cause any adverse impact on human health or the environment are dealt with promptly, effectively and efficiently.

We believe that the above strategies are more than adequate to give confidence to all parties that in the case of any breach of any Development Consent condition, environmental legislation requirements or policies/guidelines, the matter will be addressed promptly in an efficient and effective manner.

8.1 SCIENTIFIC METHODOLOGIES

As previously stated, based on the comprehensive SEE and this EMP for the development, it was clearly demonstrated that the proposed activities could be undertaken with nil adverse impact on human health or the environment provided that the proposed mitigation measures and amelioration strategies are fully implemented on site. These measures and strategies are addressed in previous Sections of this document and in the SEE.

8.2 FEEDBACK AND COMPLAINT REGISTER

The establishment and implementation of a Feedback and Complaint Register will be of great assistance to all parties to determine whether the environmental management plan and procedures are efficient and effective in minimising the impacts from the proposed activities and that the monitoring programs to be implemented on site are sufficient to determine compliances or exceedances.

The Register would be divided into two sections; the Feedback Section and the Complaints Section.

The Feedback Register would include the feedback given to RPG Demolition management in relation to all operations related matters including positive or negative feedback from staff, guests and authorised officers from government departments.

The Complaints Register would include the complaints lodged directly or indirectly with RPG Demolition management. These complaints could be made by different parties such as nearby residents, people working or are nearby, and Government Departments' employees.

We believe that the above monitoring strategies and the scientifically based monitoring programs that will be undertaken as required will be more than effective and sufficient to identify exceedances of any aspect associated with the activities. These monitoring strategies will guide RPG Demolition staff to identify the sources that are likely to cause the exceedances, if any, and to implement additional amelioration strategies and mitigation measures, if and when required.

8.3 NON-CONFORMANCES, CORRECTIVE & PREVENTATIVE ACTIONS

All non-conformances are to be reported to RPG Demolition immediately.

Non-conformances, corrective and preventative actions are to be dealt with in accordance with the Corrective and/or Preventative Actions Procedure within the EMP.

Non-conformances may include:

- Any non-compliance or release of contaminants not in accordance with the conditions of any consent, licence or approval;
- Any event where environmental harm has been caused or may be caused; or
- Any spills of contaminants.

When non-conformity is identified, corrective action to mitigate the environmental impact should be put in place. Further investigation into the cause of the non-conformity would need to be undertaken to determine what preventative measures can be implemented to ensure the non-conformity does not recur.

The issuing of corrective actions shall be initiated by any of the following events, if considered justified:

- (i) NSW EPA, Council, Sydney Water or other regulatory agency direction or request;
- (ii) In-house detection of non-conformances, e.g. chemicals found to be stored outside designated areas;
- (iii) Housekeeping inspection verified non-conformance; or
- (iv) Public complaint.

8.4 INCIDENT MANAGEMENT

Environmental incidents include emissions and spillages (gas, liquid or solid) where any of the following apply if:

- There is a possibility of soil and groundwater contamination
- There is any off-site environmental impact e.g. discharge to stormwater, dust, noise, air emissions
- The involvement of authorities, media or the community is likely
- The incident must be reported to the authorities
- There is actual or potential losses of more than \$10,000 including fines, clean up and prevention (\$10,000 is defined as Material Harm to the Environment according to the POEO Act 1997)
- Any breach of the environmental operating conditions, including consent, licences, permits and other environmental regulation
- Any complaints about environmental issues by an external party
- Any fines and warning notices for consent, permit or licence non-compliance or regulatory breaches
- Near misses with the potential to cause any of the above.

The Site Manager must be informed of any Environmental Incident as defined above. If the incident presents a material risk of harm, then the Notification of a Pollution Incident Procedure must be followed and relevant regulatory authorities must be notified immediately.

Details of the incident must be recorded including:

- staff full name, address and telephone contact details
- date, time and duration of the incident
- the type of pollutant or a description of the incident
- discharge or emission location of the incident
- the extent or size of the area where the pollution is occurring
- anything else that is relevant to the incident

Records of the incident must be maintained on file and may be required to be provided to regulatory authorities.

9. ROLES AND RESPONSIBILITIES OF RELEVANT EMPLOYEES

The Site Manager is responsible for the implementation and maintenance of the EMP throughout the activities to be conducted on site. The Site Manager may delegate the responsibility to other staff members who are appropriately trained to implement and maintain the EMP.

The current Site Manager's details are:

Peter Issa
PO Box 247 Merrylands NSW 2160
Phone: 9636 2888
Mobile: 0411 694 751
Email: peter@rpgdemo.com.au

The names of the delegated employees should be included in the relevant section of the EMP when updated.

Management will need to ensure that those coming onto site have understood the relevance and objectives of the EMP and will be carrying out their activities in accordance with the EMP and relevant development consent conditions.

Having the full commitment of contractors and their staff is imperative to achieve the high level of success intended from the use of this EMP.

Despite the fact that the Site Manager has the overall responsibility over all construction activities, he may determine that it will be more appropriate to delegate some roles and responsibilities to other employees, if considered appropriate. **Table 9-1** includes roles and responsibilities of relevant employees and contractors.

Table 9-1: Roles and Responsibilities of Relevant Employees & Contractors

Role/Position	Responsibility
Superintendent	<ul style="list-style-type: none">• Ensure compliance with all applicable legal obligations including but not limited to this EMP• Ensure all project staff understands all environmental requirements relevant to their area/scope of work.• Ensure all project staff is competent to undertake their duties including fulfilment of the general environmental duty, with regard to appropriate education, training and experience.• Take action in the event of a pollution incident and allocate the required resources to minimise environmental impact.• Ensure non-conformances are identified, recorded and reported and that required corrective and remedial actions are implemented.

Role/Position	Responsibility
	<ul style="list-style-type: none">• Report any activity that has resulted, or has the potential to result, in an environmental incident to the Site Manager immediately
Environmental Manager	<ul style="list-style-type: none">• Implement and maintain this EMP.• Coordinate and authorise environmental work and site level plans.• Coordinate and conduct regular inspections to ensure a high level of environmental performance and compliance with the EMP.• Provide technical advice regarding environmental obligations, measures and safeguards.
All Staff and Contractors	<ul style="list-style-type: none">• Comply with the requirements of applicable environmental legislation and environmental authorities including the specific requirements of the project approvals and supporting documentation• Undertake all activities in an environmentally responsible manner• Undertake all activities in accordance with the agreed environmental management plans including this EMP and procedures.• Identify and report any non-conformances.• Ensure awareness of the contact person regarding environmental matters and report any activity that has resulted in, or has the potential to result in environmental harm immediately.• Ensure attendance at any environmental training provided relevant to their role and responsibilities.

10. COMMUNITY CONSULTATION AND COMPLAINTS HANDLING PROCEDURES

Due to the nature of the standardised proposed activities scheduled to be conducted on site and the minimal potential of pollution generated by these activities, it is highly unlikely that complaints would be received from people located outside the boundaries of the site and that only feedback from people who are either working or inspecting the activities within the boundaries of the site, would be received. This means that only internal communications system would be sufficient, however, RPG Demolition management will proactively participate in voluntary and open communications with relevant stakeholders, when required. Stakeholders include community groups, contractors, NSW regulatory authorities and non-regulatory agencies. This is the main reason for establishing both a Feedback Register and a Complaint Register. Both registers will incorporate all related activities during the normal operation of the site.

10.1 COMMUNITY RELATIONS

A procedure is being developed for communicating with the residential community in a manner that highlights the site operator's concern for both their amenity and the local environment. This also ensures that any enquiries or complaints are effectively logged and actioned. This will be established with the Complaints and Feedback Register (included in this plan).

10.2 COMMUNICATIONS WITH REGULATORY AUTHORITIES

Communications with regulatory authorities, such as Council, shall occur on an as needs basis for the compliance with consent conditions. All communications with regulatory authorities concerning environmental matters are to be noted and records of any subsequent actions appropriately filed.

A typical method of reporting would be an annual environmental review to include all environmental monitoring for the site. Records and documentation resulting from the implementation of the EMP, such as inspection forms, records and community complaints should also be included in the annual reporting.

Site management would also be required to report to regulatory authorities for any additional reporting and/or testing requirements requested. This will be established on an as needs basis, upon issue of a notice or a request.

10.3 INTERNAL COMMUNICATION

The site management is to establish simple yet effective communication channels for an effective implementation of the overall environmental management system. Typical methods of communication that may suit the size of the operation include meetings and notice boards and the use of tool box sessions which are highly effective. Currently, the site management

upholds an existing internal communication strategy, and are also utilising verbal communication as the most effective method, given the size of the site and its operations.

Document control and written communication would be necessary when new contractors or employees are trained or changes are made to the EMP or any other matters that affect the holistic Environmental Management of the site.

11. REVIEW OF THE EMP AND CONTINUAL IMPROVEMENT

11.1 REVIEW OF THE EMP

The EMP should be reviewed by the Site Manager or another delegated employee who is trained appropriately to be able to undertake this task effectively and efficiently. The review should be conducted in consultation with the site supervisors to ensure that it accurately reflects the site activities when the review is conducted.

The review of the EMP should be conducted as follows:

- At least once every six (6) months
- When it is considered necessary depending of certain changes such as changes in staffing arrangements that are relevant to the EMP, changes in site activities that may have the potential to impact on the EMP and/or changes in contractors' activities on site.

11.2 CONTINUAL IMPROVEMENT

Continual improvement of the EMP will be achieved by the continual evaluation of environmental management performance against environmental legislation, policies, statutory instruments and objectives for the purpose of identifying any opportunities for improvement.

The continual improvement process could occur at any time depending of certain circumstances such as changes in operations.

Outcomes of these reviews shall be documented and retained for the duration of the development.

12. TRAINING

RPG Demolition recognises that training and awareness are an integral part of the implementation of this Environmental Management Plan.

RPG Demolition management would provide appropriate training to the Site Manager, if it is considered necessary, as it will all depend on his previous experiences with similar duties. The training would include the implementation and maintenance of the EMP to ensure that the Site Manager is competent and confident in carrying out the duties and responsibilities associated with the EMP.

In addition, the training would include a session on undertaking prompt action to manage the daily activities in the case that a feedback was provided, an enquiry was made or a complaint was received. The prompt action is required to ensure that any potential impact on human health or the environment is minimised.

It is essential that the site management thoroughly understands the contents of this EMP and be competent in the objectives, consent conditions, applicable legislation, the environmental aspects and impacts of all construction activities and the procedures.

Therefore, site management will determine the level of competency necessary for staff and contractors coming to site to ensure their environmental objectives and statutory responsibilities are met.

Training will need to be assessed on a periodic basis for staff while contractors would be assessed on a job-by-job basis. All relevant procedures should be discussed until a level of understanding has been reached and a degree of competency has been demonstrated by the staff member or contractor involved to the site operator's satisfaction.

Shortfalls could be addressed by specific on-site training. Updates and reviews should also be conducted in the case of complaints or after any changes in the EMP, in particular, a change in management, procedures, site operations or legislation.

13. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for preparation of Environmental Management Plans. No guarantees are either expressed or implied.

This Environmental Management Plan has been prepared solely for the use of RPG Demolition and Claron Consulting Pty Ltd, as per our agreement for providing environmental services. Only RPG Demolition and/or Claron Consulting Pty Ltd is entitled to rely upon the information provided in this plan within the scope of work described in this plan. Otherwise, no responsibility is accepted for the use of any part of the plan by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this plan, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by RPG Demolition for the purposes of preparing this plan.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

14. REFERENCES

1. Protection of the Environment Operations Act 1997
2. Environmental Planning & Assessment Act 1979
3. Protection of the Environment Operations (Clean Air) Regulation 2010
4. NSW EPA – Noise Policy for Industry 2018
5. Holroyd Local Environmental Plan 2013
6. Holroyd Development Control Plan 2013
7. Department of Planning Guidelines for the Preparation of Environmental Management Plans - 2004
8. NSW Environment Protection Authority, “Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales”, August 2005
9. NSW Environment Protection Authority, “Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales”, January 2007
10. NSW Environment Protection Authority, “Technical Framework – Assessment and management of Air quality from stationary sources in NSW”, November 2006
11. Guideline for the Preparation of Environmental Management Plans published by the Department of Infrastructure, Planning and Natural Resources in 2004.
12. **Statement of Environmental Effects for RPG Demolition** 123 Magowar Road, Girraween – Report No 527 Rev.1 prepared by Claron Consulting Pty Ltd and dated October 2018

Attachment 1 – Additional Environmental Management Procedures

RPG DEMOLITION

Workplace Inspection Procedure

PROCEDURE NO. 182701.1

DATE: 07/11/2018

PREPARED BY: National Integrated Creative Solutions

REVISION NO.:1

SUBJECT: **Workplace Inspection Procedure**

1. PURPOSE

The purpose of this procedure is to set out the process relating to Workplace Inspections of RPG Demolition Resource Recovery facility in relation to the organisation's activities aspects.

2. RESPONSIBILITIES

- Site Manager
- All staff and contractors of RPG Demolition
- Environmental Manager

3. REFERENCES

- Protection of the Environment Operations Act 1997

4. DEFINITIONS

Workplace Inspections

Inspections conducted by the Site Manager, a delegated RPG Demolition employee or Environmental Manager using the environmental checklist provided to assess the housekeeping standards of the facility.

Environmental Harm

Any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above includes any act or omission that results in pollution. (Ref: POEO Act)

Due Diligence

The systematic identification of the environmental risks and liabilities associated with an organisation's sites and operations.

5. PROCEDURE

- A sample Workplace Inspection Checklist is provided overleaf to be completed and recorded on a fortnightly basis. This information is used to check compliance and ensure due diligence. It is also used to determine whether action must be taken to rectify activities related matters that have arisen and may have the potential to cause harm to the environment or human health. This checklist must be updated to correctly reflect specific site requirements when operations are modified.
- The Site Manager is responsible for ensuring that any actions required are implemented. The appropriate column of the checklist to indicate that these actions have been adequately undertaken is also the responsibility of the Site Manager or delegate/s.
- The Workplace Inspection must cover all active working areas including:
 - ▶ The incoming material loading, unloading, stockpiling and storage areas;
 - ▶ External areas including car parking areas, roadways, stormwater drains and boundaries;
 - ▶ Excavated areas, if any;
 - ▶ Waste storage areas; and
 - ▶ Office areas and amenities.
- The Workplace Inspection Checklist must be updated as required. Site management may prefer to update the checklist so it is more specific to each area.

6. RECORDS

All records of Workplace Inspections and any corrective actions (if required) must be maintained.

RPG DEMOLITION

SUBJECT: WORKPLACE INSPECTION CHECKLIST - Page 1

Area: _____			Date: _____
ITEM CHECKED	YES	NO	DETAILS
Are all staff trained in the activities management awareness?			
Is there any excessive or unusual dust present?			
Is all waste stored appropriately to minimise harm to human health or the environment?			
Are all erosion and sediment controls in place and well maintained?			
Are all areas well managed to prevent the generation of dust?			
Is any environmental documentation missing from display – signage, policy, emergency plan, SDS register etc.?			
Is any firefighting equipment missing, blocked from easy access or not been serviced in the past 6 months?			
Are safety signs visible and in good condition?			
Are any containers or items not in the correct location?			
Does the active working areas appear to be well managed and in normal working order?			

RPG DEMOLITION

Complaint Management Procedure

PROCEDURE NO. 182701.2 **DATE:** 07/11/2018

PREPARED BY: National Integrated Creative Solutions **ISSUE NO.:** 1

SUBJECT: **Complaint Management Procedure**

The purpose of this procedure is to ensure that a “complaints oriented” process is in place to focus on the type, date, time and origin of the complaint, together with “feedback” to the complainant regarding (if appropriate) investigation of the complaint and any remedial action arising from the complaint.

Public complaints registers are to be maintained in a separate document titled “Complaints Register”.

14.1.1 Procedure

- Complete the Complaint Response Form. The following information is mandatory:
 - ▶ Name of complainant;
 - ▶ Location of complainant;
 - ▶ Date and time of complaint;
 - ▶ Weather conditions prevailing at the time of complaint;
 - ▶ Any process operations existing at the time of complaint; and
 - ▶ Telephone Number
- Complaint investigated by site management or staff and action appropriate to the circumstances taken.
- Advise Council, if required.

Appropriate actions may include, but not limited to the following:

- Investigation in to the mobile plant movements during the period in question. If mobile plant movements were in breach of the Environmental Management Plan, remedial action must be taken e.g. inform the vehicle driver(s) of the breach of site conditions and request compliance in the future.
- Where complaints relate to excessive dust emissions (or offensive noise):
 - ▶ Advise the complainant that investigation will be initiated immediately and ask the complainant to note the time and nature of the dust or noise when the issue reoccurs.
 - ▶ From the time the complaint is lodged, conduct regular weather monitoring (use The Site Climate Record form) so that upon reoccurrence of the issue, the weather

conditions can be checked to confirm the likelihood of the dust (or noise) generated from site to cause the complaint.

- ▶ If the likelihood is high, appropriate tests/measurements at the location specified by the complainant as being the possible cause of the complaint (similar time of day) can be conducted. Compare results with previous tests/measurements (if available) and where an increase has occurred, further investigate sources, recommend remedial action for the preparation of an action plan to rectify the problem on a long-term basis.
- On completion of the Action Plan ensure that the complainant is fully informed of remedial measures and that the Complaint Register updated.

RPG DEMOLITION - COMPLAINTS & FEEDBACK REGISTER

Complaint Register Reference No.	Date	Time	Logged by (name)	Complainant Name	Type of Complaint O/ D/ N/ P Other	Investigated (date)	Action Taken (Date)	Complainant Informed (Date)	Complaint management procedure completed (Signature and date)

RPG DEMOLITION – ENVIRONMENTAL COMPLAINT RESPONSE FORM

REF: 01

REV: 1

PAGE 1 OF 2

COMPLAINT REGISTER REFERENCE NO:.....

DATE:TIME:.....AM/PM

COMPLAINTS RECEIVED BY:.....

NAME OF COMPLAINANT:.....TELEPHONE NO:.....

ADDRESS:.....

DETAILS OF COMPLAINT:

DATE OF OCCURENCE:.....TIME AM/PM:.....

WEATHER DATA CHECK: Estimate weather conditions from observed Site Climate Records or Meteorological data from a relevant Bureau of Meteorology Station.

Where L/M/S = Low/Medium/Strong, and Wind direction is monitored on an 8 points scale of N, NE, E, SE, S, SW, W, NW.

External Temp °C	Rel. Humidity (%)	Wind Direction	Wind Speed L/M/S	Odour L/M/S	Equipment Condition

LOCATION OF THE EVENT:.....

PROCESS OPERATIONS AT TIME OF COMPLAINT:.....

PARTICULAR DETAILS RELATING TO THE COMPLAINT:

.....

CORRECTIVE AND PREVENTATIVE ACTION:

COMPLAINT INVESTIGATED BY:

RESULTS OF INVESTIGATION:

.....
.....
.....
.....
.....
.....
.....

ON COMPLETION OF CORRECTIVE AND PREVENTATIVE ACTION:

LETTER SENT TO COMPLAINANT YES NO N/A DATE:

WORK PRACTICE MODIFIED YES NO N/A DATE:

COMPLAINT RESPONSE COMPLETE:

PRINT NAME

SIGNATURE:

DATE: TIME:AM/PM