

CONCRUSH PTY LTD

OPERATIONAL WASTE MANAGEMENT PLAN

TERALBA FACILITY

JUNE 2022

PUBLIC



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Operational Waste Management Plan Teralba Facility

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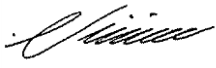
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1 INTRODUCTION

1.1 BACKGROUND

WSP Pty Ltd (WSP) was engaged by Concrush Pty Ltd (Concrush) to prepare an *Operational Waste Management Plan* (OWMP) for the Concrush operations at 21 Racecourse Rd, Teralba NSW 2284 (hereafter referred to as “the site”).

Concrush provides cost effective disposal options for recycling of asphalt, bricks & pavers, ceramic & porcelain, concrete, roadbase and slag roadbase (unbound & bound), roof tiles, rock (natural & engineered), sand (natural & engineered), green waste & stumps from residential households and commercial industry. Concrush recycles these materials into specification and non-specification quality products such as select fill, sub-base, base, drainage aggregates, dust bedding and mulch that can be used within the civil and construction industries for commercial and residential applications.

Broadly, the material streams received, and product produced at the Concrush site are described below as:

- Building and demolition waste is received at the site from customer delivered loads. This waste material is further processed at the site to form various recycled aggregate products.
- Garden / wood waste is received at the site from customer delivered loads. This organic waste material is further refined at the site to form a recycled pasteurised organic product.
- Site Generated Waste is waste which is generated at the site, and includes:
 - Non-production wastes including general domestic wastes from the on-site office, amenities and routine maintenance & operations consumables.
 - Production wastes including minor amounts of plastic, timber, metal and paper removed during the processing of waste materials and/or any processed waste material deemed unsuitable for re-use.

Concrush is committed as part of its OWMP to the management of waste streams in accordance with the principles of the waste hierarchy, where emphasis is placed upon reduce, reuse, recycle prior to disposal of wastes.

1.2 OBJECTIVES

This OWMP has been prepared to facilitate the management of all materials received and processed at the Concrush site as well as all waste materials produced and disposed of from the site.

Specifically, this OWMP addresses:

- Legislative framework.
- Management and monitoring of waste received and processed on the site.
- Management of waste generated on-site.
- Additional requirements of the site EPL.
- Training and awareness.
- Roles and responsibilities.
- Review and revision of operational waste management plan.

This OWMP forms part of an over-arching *Operational Environmental Management Plan* (OEMP) and has been prepared to facilitate the management of wastes associated with final site operations following the receipt of all necessary approvals and licenses, however, where existing limits are currently in place these have been detailed in the current

version of the OWMP. It is anticipated that the OWMP will be revised as these restrictions are progressively lifted under the appropriate planning instruments.

2 LEGISLATIVE COMPLIANCE

2.1 LEGISLATIVE FRAMEWORK

This OWMP has been produced to ensure compliance with:

- 1 Lake Macquarie Council Development Consent (DC 02/00558/1N).
 - To be replaced by Development Consent (SSD 8753), detailed in Item 3 below.
- 2 NSW EPA *Environment Protection Licence (EPL) No. 13351*.
 - This EPL (issued under the *Protection of the Environment Operations Act 1997*) authorises Concrush to undertake resource recovery and waste storage activities at their site under certain conditions.
- 3 NSW Department of Planning, Industry and Environment (DPIE) *Development Consent (SSD 8753)*.
 - Provides approval conditions for the staged expansion and increase in the processing capacity of the existing facility.
 - Details various requirements for the development including various reporting, notification and planning requirements.
- 4 Umwelt Pty Ltd Concrush *Increase to Capacity Project Teralba, NSW - Environmental Impact Statement*, 2018
 - The EIS provides an assessment of the potential environmental and community impacts of the proposed expansion and increase in capacity at the Concrush site and details proposed mitigation measures, which have been included in the *Development Consent (SSD 8753)*.
- 5 *Environmental Planning and Assessment Act 1979*.
 - The objective of the EP&A Act is to promote social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources.
- 6 *Protection of the Environment Operations Act 1997*.
 - The POEO Act is the key piece of environment protection legislation administered by the NSW EPA and provides a framework for administration of environmental protection licenses, environmental protection notices, notification and management requirements and environmental offences and penalties.
- 7 *Waste Avoidance and Resources Recovery Act 2001*.
 - This Act promotes waste avoidance and resource recovery to achieve a continual reduction in waste generation. The Act provides for the development of a state-wide Waste Strategy and introduces a scheme to promote extended producer responsibility for the life-cycle of a product.
- 8 *Protection of the Environment Legislation Amendment Act 2011*.
 - This legislation introduced key changes to improve the way pollution incidents are reported and managed. Specifically, it provides guidance and direction for licensees to report pollution incidents immediately and prepare and implement pollution incident response management plans.
- 9 *Protection of the Environment Operations (Waste) Regulation 2014*.
 - This regulation provides a framework for the management of waste in NSW and includes firmer rules, standards and deterrence measures for waste operators. The POEO Waste Regulation provides for resource recovery orders and resource recovery exemptions to allow some wastes to be beneficially and safely re-used, under strict controls, independent of the usual NSW laws that control the application of waste to land.

10 *Protection of the Environment Operations Legislation Amendment (Waste) Regulation 2018.*

- This amendment provides further clarity and direction around the management of construction waste within NSW. This Regulation specifically affects Concrush operations through standards it requires to be implemented around inspection and management of construction waste brought on to the site.
- Guidance provided in NSW EPA *Standards for Managing Construction Waste in NSW 2018*.

11 Resource Recovery Order under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014 – *The Concrush Recovered Aggregate Order 2021*.

- Imposes the requirements that must be met by suppliers of Concrush Pty Ltd recovered aggregate to which *The Concrush Recovered Aggregate Exemption 2021* applies.

12 Resource Recovery Order under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014 – *The pasteurised garden organics order 2016*.

- Imposes the requirements that must be met by suppliers of pasteurised garden organics to which *The pasteurised garden organics exemption 2016* applies.

13 NSW EPA *Waste Avoidance and Resource Recovery Strategy 2014 - 2021*

- The NSW EPA currently operate a five yearly Waste Avoidance Resource Recovery Strategy (WARR). The WARR outlines future directions and supports investment in infrastructure, encourages innovation and improvements in recycling behaviour. Two key elements of the WARR that Concrush provide are increasing construction and demolition waste recycling and increasing waste diverted from landfill.

2.2 COMPLIANCE WITH DEVELOPMENT CONSENT CONDITIONS

NSW DPIE *Development Consent (SSD 8753)* provides approval conditions for the staged expansion and increase in the processing capacity of the existing facility. Requirements for the development including various reporting, notification and planning are detailed in *Development Consent (SSD 8753)*, including the requirement for Concrush to prepare an OWMP (this plan) which forms part of an OEMP.

Key stages defined within the *Development Consent (SSD 8753)* include:

- Stage 1 construction.
- Stage 1 operations.
- Stage 2 constructions.
- Stage 2 operations.

This OWMP has been revised for Stage 2 operational works. Specific requirements of the *Development Consent (SSD 8753)* addressed by the OWMP are detailed in Table 2.1.

TABLE 2.1 COMPLIANCE WITH DEVELOPMENT CONSENT CONDITIONS

CONDITION(S)	REQUIREMENT	REFERENCE
Management Plan Requirements		
C1	Management plans must be prepared in accordance with requirements specified in Condition C1 and to the satisfaction of the Planning Secretary, and must include:	This OWMP

CONDITION(S)	REQUIREMENT	REFERENCE
C1(a)	Detailed baseline data.	Historic compliance testing data is held by Concrush and NSW EPA and can be made available on request.
C1(b)	Details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	Refer to overarching OEMP, Section 6.1 OWMP, Section 2.1 and 3
C1(c)	A description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Refer to overarching OEMP, Appendix B (Waste). OWMP, Section 3.9
C1(d)	A program to monitor and report on the: (i) impacts and environmental performance of the development; (ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	Refer to overarching OEMP, Sections 7.8, 7.11 and 7.12 OWMP, Section 3
C1(e)	A contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	OWMP, Sections 3.9.1.2 and 3.9.2.2
C1(f)	A program to investigate and implement ways to improve the environmental performance of the development over time;	Refer to overarching OEMP, Sections 7.11, 7.12 and 10
C1(g)	A protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements;	Refer to overarching OEMP, Sections 3, 7.11, 7.13.1, 8 and 9 OWMP, Sections 3.9.1.2, 3.9.2.2
C1(h)	A protocol for periodic review of the plan.	Refer to overarching OEMP, Section 10 OWMP, Section 8
Waste Limits		
A6	The only type of waste permitted to be received or processed at the site is waste classified as general solid waste (non-putrescible).	OWMP, Section 3.2

CONDITION(S)	REQUIREMENT	REFERENCE
A7	The Applicant must not: (a) receive or process more than 250,000 tonnes of general solid waste (non- putrescible) per annum, which includes no more than 5,000 tonnes of garden and wood waste; and (b) store more than 150,000 tonnes of general solid waste (non- putrescible) at any one time, which includes 200 tonnes of garden and wood waste.	OWMP, Section 3.5
A8	Despite condition A7(a) and condition A7(b), the Applicant must not receive or process more than 108,000 tonnes per annum or store more than 40,000 tonnes of general solid waste (non-putrescible) at any one time until Stage 1 construction is complete and the Planning Secretary has approved the commencement of Stage 1 operations.	OWMP, Section 3.5
A9	Despite condition A7(a) and condition A7(b), the Applicant must not receive or process more than 200,000 tonnes per annum or store more than 150,000 tonnes at any one time of general solid waste (non-putrescible) during Stage 1 operations.	OWMP, Section 3.5
10	Despite condition A7(a) and condition A7(b), the Applicant must not proceed to Stage 2 operations (receive and process up to 250,000 tonnes per annum and store up to 150,000 tonnes at any one time of general solid waste) until Stage 1 construction and Stage 2 construction is complete and the Planning Secretary has approved commencement of Stage 2 operations.	OWMP, Section 3.5
A11	Stockpiles of processed and/or unprocessed waste on site must not be more than 10 metres in height when measured from the finished ground level of the site.	OWMP, Section 3.6.3.3
Statutory Requirements		
B1	Concrush must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	OWMP, Section 4
B2	The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.	OWMP, Section 4.3
Operational Waste Management Plan		
B3	Prior to the commencement of Stage 1 operations and Stage 2 operations, the Applicant must prepare a waste management plan (WMP) for the development to the satisfaction of the Planning Secretary. The WMP must form part of the OEMP required by condition C5 and be prepared in accordance with condition C1. The Plan must:	This OWMP

CONDITION(S)	REQUIREMENT	REFERENCE
B3(a)	Detail the type and quantity of waste to be generated during construction and operation of the development;	OWMP, Section 4.1
B3(b)	Describe the handling, storage and disposal of all waste streams generated on site, consistent with the <i>Protection of the Environment Operations Act 1997</i> , <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the <i>Waste Classification Guideline</i> (EPA, 2014)	OWMP, Section 4
B3(c)	Include details of the waste stockpile limits that will be maintained in the raw waste stockpile and processing area and processed waste stockpile area;	OWMP, Section 3.6
B3(d)	Include procedures for ensuring no build-up of waste will occur in the unprocessed waste stockpiles area during unexpected machinery break down	OWMP, Section 3.6
B3(e)	Detail the waste to be reused or recycled, either on or off site;	OWMP, Section 3, 4
B3(f)	Detail the requirements for non-conforming waste handling and removal.	OWMP, Sections 3.9
B4(a)	The Applicant must not commence Stage 1 operations until the OWMP required by condition B3 is approved by the Planning Secretary.	OWMP, Section 3.5
B4(b)	The Applicant must not commence Stage 2 operations until the OWMP required by condition B3 is approved by the Planning Secretary.	OWMP, Section 3.4
B4(c)	The Applicant must implement the most recent version of the Operational waste management plan approved by the Planning Secretary.	OWMP, Section 7.2
Waste Monitoring Program		
B5	The Applicant must implement a Waste Monitoring Program for the Development.	OWMP, Section 3.2
B5(a)	Be prepared by a suitably qualified and experienced person(s) prior to the commencement of Stage 1 operation.	OWMP, Section 3.2
B5(b)	Include suitable provision to monitor the: (i) quantity, type and source of waste received on site; and (ii) quantity, type and quality of the outputs produced on site;	OWMP, Sections 3.2 and 3.7
B5(c)	Ensure that: (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	OWMP, Sections 3.1 and 6

CONDITION(S)	REQUIREMENT	REFERENCE
Receipt, Storage and Handling of Waste		
B6	The Applicant must ensure that the waste screening and inspection protocols operate in a manner which does not cause trucks to queue onto Racecourse Road.	Concrush <i>Traffic Management Plan</i> (TMP – Operational phase).
B7	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	OWMP, Sections 3.3.3 and 3.5
B8	The Applicant must only receive waste on site that is authorised for receipt by an Environment Protection Licence (EPL).	OWMP, Section 3.1
B9	The Applicant must provide details of the allocated heavy vehicle and source of wastes received on the site to the EPA and the Planning Secretary when requested.	OWMP, Section 3.2
Garden and Wood Waste Processing		
B24	The Applicant must ensure garden and wood waste leachate is not reused outside of the garden and wood waste leachate barrier system, unless written approval has been granted by the EPA.	OWMP, Section 3.6.2
Concrush's Management and Mitigation Measures		
Appendix 2	Waste streams will be managed in accordance with the principles of the waste hierarchy, with emphasis on reduce, reuse, recycle prior to disposal of its wastes.	OWMP, Section 4
Appendix 2	All material used will be in accordance with the relevant requirements and conditions of the exemptions.	OWMP, Section 3.8
Appendix 2	General waste generated by site personnel during operation of the Project will be accommodated through the use of a 240-litre municipal waste bin to be collected by LMCC or a licensed contractor for disposal/recycling at an appropriate waste management facility.	OWMP, Section 4.1
Revision of Strategies, Plans and Programs		
C8, C9	Strategies, plans and programs must be revised in accordance with requirements specified in Conditions C8 and C9 .	Refer to overarching OEMP, Section 10
Reporting and Auditing		
C10	Incident notification, reporting and response must be undertaken in accordance with requirements specified in Condition C10 .	Refer to overarching OEMP, Section 8.3.2
C11, C12, C13	Non-compliance notification must undertaken in accordance with requirements specified in Conditions C11, C12 and C13 .	Refer to overarching OEMP, Section 7.1.3

CONDITION(S)	REQUIREMENT	REFERENCE
C14, C15	Annual review must be undertaken in accordance with requirements specified in Conditions C14 and C15 .	Refer to overarching OEMP, Section 7.11 and OWMP, Section 8
C16, C17	Independent environmental audit must be undertaken in accordance with requirements specified in Conditions C16 and C17 .	Refer to overarching OEMP, Section 7.12.2, 10
C18	Monitoring and environmental audit must be undertaken in accordance with requirements specified in Conditions C18 .	Refer to overarching OEMP
C19	Access to information must be provided in accordance with requirements specified in Conditions C19 .	Refer to overarching OEMP, Section 3.1 and OWMP, Section 5.2

3 MANAGEMENT AND MONITORING OF WASTES RECEIVED AND PROCESSED AT THE SITE

3.1 WASTE RECEIPT

Concrush use the WasteMan tracking system to record details of all inbound and outbound waste material. The WasteMan tracking system records the following details:

- Vehicle registration number.
- Customer type.
- Date/time of transaction.
- A description of the nature of material being brought in/taken off site.
- Which suburb material has come from/or going to.
- The weight of the material brought in/taken off site.
- Purchase order/job number (if applicable).

Non-transactional usage of the weighbridge may also occur for various reasons as detailed in the Concrush *Weighbridge Non-Transactions* document, presented in Appendix A.

3.2 MATERIAL INSPECTION

3.2.1 ACCEPTED WASTES

In accordance with the site EPL and *Development Consent (SSD 8753)*, Concrush must not allow any wastes to be received at the premises unless the material is classified as one of the following:

- Building and demolition waste which does not contain asbestos.
- Virgin Excavated Natural Material (VENM).
- Wood waste.
- Garden waste.

Wastes received at the premises must only be used for the resource recovery activities specified in the EPL.

3.2.2 REJECTED WASTES

Concrush does not allow for non-recyclable waste materials to be received on-site as detailed in the Concrush *Rejected Load Policy*, detailed in Appendix B.

Specifically, Concrush will not accept building and demolition waste loads where the following materials are detected:

- Asbestos containing materials.
- Potential asbestos containing materials:
 - Fibrous cement products.

- Gyprock or plasterboard material.
- Compressed concrete.
- Coal tar.
- Potential coal tar products (asphalt containing naphthalene / creosote odour or otherwise suspected or confirmed to contain coal tar).

In addition, the following waste types are prohibited:

- Domestic putrescible waste.
- Food waste.
- Radioactive waste.
- Explosive waste.
- Chemical waste.
- Animal waste.
- Rubber waste (tyres).
- Liquid wastes.
- Lead painted waste.

Additionally, Concrush will not accept garden organic waste loads where the following materials are detected:

- Asbestos containing materials.
- Potential asbestos containing materials:
 - Fibrous cement products.
 - Gyprock or plasterboard material.
 - Compressed concrete.
- Steel or metal material.
- Plastic, PVC or Vinyl products.
- Building and demolition waste.
- Gyprock or plasterboard material.
- Engineered wood products.
- Treated or Coated wood products.

If any of the above products are detected at the weighbridge or other inspection points (see Section 3.2), the entire load is rejected and directed to immediately be removed from the facility in accordance with the Concrush *Rejected Load Policy*. Information pertaining to the load rejection is to be recorded on the Concrush *Rejected Loads Register*. Key information to be recorded includes:

- The date and time on which the load was rejected along with the inspection staff member(s).
- A description of the type of waste in the rejected load.
- A description of the reason the load of waste was rejected along with photographic evidence where possible.

- Documentation of the rejected load shall also be provided to the customer using the *Concrush Rejected Load Confirmation Form* completed by the inspection staff. The customer shall also be provided with a copy of the *Concrush Rejected Load Policy*.

Any rejected load must be taken off-site on the same business day.

The *Concrush Rejected Load Policy* and the *Concrush Rejected Load Confirmation Form* are presented in Appendix B.

3.3 MATERIAL INSPECTION REQUIREMENTS

As detailed in the *Development Consent (SSD 8753)*, Concrush must:

- Implement a Waste Monitoring Program for the Development, to be prepared by a suitably qualified and experienced person(s) prior to the commencement of Stage 1 operation.
- Provide details of the allocated heavy vehicle and source of wastes received on the site to the NSW EPA and the Planning Secretary when requested.
- Ensure that the waste screening and inspection protocols operate in a manner which does not cause delivery vehicles to queue onto Racecourse Road.

The NSW EPA *Standards for Managing Construction Waste in NSW 2018* outlines how material being brought onto site should be inspected prior to processing. The Standards outline a three-point inspection process along with specific requirements for training and rejection of loads. The process by which these Standards are to be implemented at the Concrush site are as follows.

3.3.1 INSPECTION POINT 1

The first point for inspection of construction waste arriving at the facility is at the weighbridge at the Racecourse Road entrance. The procedure for inspection will be as follows:

- All covered loads will be un-tarped at a designated location before the weigh bridge.
- The top of each load entering through the weighbridge will be inspected by using a video camera connected to a monitor. Where possible, staff will also carry out inspections physically from an elevated inspection point.
- All inspection staff will be required to have training specified in Section 6.
- Where the load is identified as containing (or is reasonably suspected to contain) any material identified in Section 3.1.2, the entire load is to be rejected and directed to immediately leave the facility.
- Where the load is deemed suitable to move to the next inspection point and does not meet the definition of an exception as detailed in Section 3.2.4, the driver is directed by weighbridge staff to proceed to Inspection Point 2, the location of which may vary based on the type of waste stream.
- The transporter of accepted material will be directed by weighbridge staff to the designated spreading area for Inspection Point 2. They will be directed to be tuned to the correct radio channel and will be required to adhere to instructions by site staff. The weighbridge staff will notify operators at specific waste stream inspection areas so they are aware of incoming loads.

3.3.2 INSPECTION POINT 2

Inspection Point 2 is a location on-site where materials are to be tipped and spread for inspection by trained personnel (as specified in Section 6).

Due to the nature of approved operations on-site, the location and size of the Inspection Point will vary based on locations of sorted and processed materials, availability of space and accessibility of locations to trucks and plant. Inspection Point 2 locations are to be selected at the start of every business day based upon the location of individual storage areas, availability of space and knowledge of incoming loads for the day.

The whereabouts and selected spreading requirements of Inspection Point 2 locations are to be communicated to the weighbridge at the start of every business day so that staff can direct trucks to the required locations.

As specified in NSW EPA *Standards for Managing Construction Waste in NSW* 2018, at Inspection Point 2, trained personnel must:

- Direct the driver of the vehicle to the designated tip and spread inspection area.
- The vehicle will be directed to wait while the inspection is undertaken. It should not be allowed to leave until the inspection is completed.
- Spread the entire load and inspect the visible surface area for any asbestos waste and any other unpermitted waste.
- Where practical and determined to be required by trained personnel at either Inspection Point 1 or 2, loads are to be spread and turned to inspect the entire load for any asbestos waste and any other unpermitted waste on or beneath the visible surface.
- Where the load is identified as containing (or is reasonably suspected to contain) any material identified in Section 3.1.2, the entire load is to be rejected and must immediately be re-loaded onto the vehicle it arrived on or onto another vehicle and ensure that the vehicle with the rejected load leaves the facility on the same business day.
- Ensure that all waste that may be lawfully received by Concrush proceeds to be processed and stored in accordance with the guidance provided in subsequent sections of this plan.

The Concrush *Identification and Disposal of Foreign Material and Contaminants Procedure for Inspection Point 2* is presented in Appendix C.

3.3.3 INSPECTION POINT 3

Inspection Point 3 is to ensure that material is stored in appropriate locations on-site in accordance with the live site plan. Once material has been transferred it must be stored within designated waste storage areas. A live plan of the site layout detailing the location of waste storage areas is to be maintained in a central accessible location.

Appropriately trained personnel must ensure that material is placed in accordance with the live plan, and undertake the following:

- Each business day all designated storage areas are to be inspected to determine whether waste is being stored appropriately.
- If any waste is found in a storage area designated as another listed waste type, the material is to be immediately moved to the correctly designated storage area. Any waste observed to be stored in an incorrect area is to be reported with observations being recorded including each incidence of waste being identified in the wrong storage area, along with the date, time and name of trained personnel carrying out the inspection.

The Concrush *Inspection Point 3 Procedure and Form* is presented in Appendix C.

3.3.4 EXCEPTIONS TO THE INSPECTION PROCESS

All materials must undergo inspection at Inspection Point 1 irrespective of the nature of the material entering the site.

In order for wastes to be exempted from the remaining Inspection process, the producer of the waste must provide a statement of compliance for that waste which ensures that it has been kept in accordance with the applicable resource recovery order (that order being current at the time of receipt).

This statement should include all relevant sampling and analytical data along with a comparison against the order clearly demonstrating compliance.

Following inspection at Inspection Point 1, the load must be immediately transferred to the appropriate waste processing or storage area.

The statement of compliance provided by the producer shall be made available to NSW EPA upon request.

3.4 WASTE SORTING AND MIXING REQUIREMENTS

All material accepted at the Concrush site must be sorted and characterised into individual waste types before being transferred to the waste storage areas and must not be mixed with any other waste at the facility unless:

- That other waste has already been inspected and sorted at the Concrush site in accordance with this plan.
- Both wastes are of the same listed waste type.

3.5 WASTE STORAGE PROCEDURES

Storage of the waste materials listed in the EPL, and detailed in Section 3.1.1 of this plan, prior to their use in resource recovery is permissible. The authorised amount of waste material currently permitted by the EPL to be stored at any one time at the Concrush facility is 40,000 tonnes.

The *Development Consent (SSD 8753)* details that once Stage 2 construction is complete and the Planning Secretary has approved commencement of Stage 2 operations, the Concrush site may:

- Receive or process up to 250,000 tonnes of general solid waste (non-putrescible) per annum, which includes no more than 5,000 tonnes of garden and wood waste.
- Store no more than 150,000 tonnes of general solid waste (non-putrescible) at any one time, which includes no more than 200 tonnes of garden and wood waste.

However, various interim limits have been detailed subject to a staged approvals process as detailed below:

- The Concrush site must not receive or process more than 108,000 tonnes per annum or store more than 40,000 tonnes of general solid waste (non-putrescible) at any one time until Stage 1 construction is complete and the Planning Secretary has approved the commencement of Stage 1 operations.
- The Concrush site must not receive or process more than 200,000 tonnes per annum or store more than 150,000 tonnes at any one time of general solid waste (non-putrescible) during Stage 1 operations.

The *Development Consent (SSD 8753)* also details that:

- Stockpiles of processed and/or unprocessed waste on site must not be more than 10 metres in height when measured from the finished ground level of the site.
- Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.
- This OWMP must include details of the waste stockpile limits that will be maintained in the raw waste stockpile and processing area and processed waste stockpile area.
- This OWMP must include procedures for ensuring no build-up of waste will occur in the unprocessed waste stockpiles area during unexpected machinery break down.

In accordance with the NSW EPA *Standards for Managing Construction Waste in NSW 2018* all waste received at the Concrush site must be stored under the following requirements:

- Waste which has been classified into an individual listed waste type that is clearly recorded on the live site plan indicating the type of waste stored and any other pertinent information.
- Waste storage areas containing waste intended to meet the requirements of a resource recovery order, or other industry or client specification, that is awaiting compliance test results, must also contain the words ‘awaiting validation’ on the live site plan.

- If waste is being stored outside of an enclosed bay (separated by concrete blocks), each stockpile of waste must be clearly delineated and separated from stockpiles of other listed waste types by a minimum of three metres from the base of the stockpile.
 - Separate stockpiles containing the same listed waste type may touch at the base and are exempt from the three-metre separation requirement.
-

3.6 STOCKPILE MANAGEMENT

3.6.1 *STOCKPILE MANAGEMENT OBJECTIVES*

Stockpile management procedures have been developed for the storage of materials as part of the day to day operation of the Concrush facility in order to:

- Provide adequate storage and stockpiling of various types of materials at the Concrush facility.
- Manage risk factors associated with stockpiling and storage of various materials.
- Prevent / minimise environmental harm from stored materials.
- Provide consideration of storage timeframes and market requirements for products.

3.6.2 RISK FACTORS

A summary of the key risk factors is presented below:

- On-site risk factors include:
 - Material type, and the chemical and physical characteristics of the material being stockpiled.
 - Hydrological and hydrogeological conditions including proximity to surface water and groundwater, water quality and surrounding environment / sensitive areas.
 - Proposed management approach of the stockpiled materials.
- Off-site risk factors include:
 - Proximity to and sensitivity of the surrounding environment (including adverse impact to water, human health and amenity).
 - Exposure due to elevation of the working floor level which the stockpile is situated upon, relative to the surrounding environment.
 - Implementation of appropriate pollution control standards.
 - Management of traffic in and around the site.

3.6.3 STOCKPILE MANAGEMENT MEASURES

A summary of the key considerations is presented below:

3.6.3.1 MATERIAL TYPE

The following aspects will need to be considered for each type of material stored:

- Leachate, Dust, Odour & Litter:
 - Materials with a potential to produce leachate and contaminated run-off are only stored on the green waste hardstand area. Potential leachate is then captured in the leachate dam and wetland. Stormwater should be diverted away from the leachate stockpiled material. If required, the material may be covered to prevent leachate generation. Any leachate generated must be contained to prevent contaminated run-off.
 - Building and demolition materials, garden / wood waste and VENM may generally be stored uncovered outside. Management measures including dust suppression and stormwater controls are required to ensure any emissions are controlled.
- Vermin & Pests:
 - Outdoor stockpiles of materials can also harbour vermin such as rodents and mosquitoes which may lead to the risk of diseases. Controls such as barriers, covering, minimised storage timeframes and generally good housekeeping should be implemented to help mitigate potential impacts from vermin.
- Fire:
 - Materials that can produce heat through degradation (such as garden / wood wastes) should not be stored for long periods and should remain well aerated to reduce any risk of overheating and spontaneous combustion. Regular internal stockpile temperature monitoring and control should be undertaken to provide information to assist with better management.
 - Depending on the size and composition of the stockpile, there should be sufficient spacing between stockpiles to allow access in case of emergency and to help prevent the spread of fire. This spacing should at least be equal to the height of the stockpile or adequate for emergency vehicle access, whichever is the greater.

- Depending on the size and composition of the stockpile, flammable or combustible liquids and hazardous wastes should not be stored in the immediate vicinity. Similarly, maintenance and activities that can produce sparks such as welding should be conducted away from stockpile materials which are combustible.
- In accordance with the development consent:
 - Prior to the commencement of Stage 1 operations, Concrush must prepare an Emergency Management Plan (EMP) in accordance with the latest version of the AS 3745-2010, taking into consideration FRNSW's Fire Safety Guideline: Fire Safety in Waste Facilities, 2019.
 - Prior to the commencement of Stage 1 operations, water storage tanks must be in operation near the garden and wood waste area along with the provision of fire extinguishers on all machinery.

3.6.3.2 STORAGE LOCATION AND SURROUNDINGS

The following locational aspects will also need to be considered when stockpiling materials:

- Materials must be stored away from surface watercourses, flood zones and groundwater recharge areas to prevent environmental harm to water quality. There are obligations and associated offences under the *Protection of the Environment Operations Act (1997)* relating to the discharge of runoff water to land or waters, including infiltration.
- Ensure appropriate separation distances and assist in the minimisation of the potential for adverse impacts such as odour, dust, noise and other impacts on amenity.
- Materials should be segregated into discrete and manageable components with clear signage demarcating the various storage areas.
- Sites should be secured to prevent un-authorised access but allow for entry of emergency vehicles.
- Material storage is to be undertaken in a manner which allows access for vehicle and emergency access and materials handling and sampling across the site.

3.6.3.3 STOCKPILE SIZE

- Raw and processed wastes will be managed to ensure stockpiles do not exceed limits detailed in the *Development Consent* (SSD 8753), as summarized in Section 3.4. Specifically, stockpiles of processed and/or unprocessed waste on site must not be more than 10 metres in height when measured from the finished ground level of the site.
- In some situations, a lower stockpile height may be required due to the risk of environmental impact upon nearby sensitive locations or land uses.
- The risks posed by the specific stockpile material should be considered when determining a suitable width and overall footprint of the stockpile, for example, accessibility or risk of fire.

3.6.3.4 STOCKPILE STABILITY

When considering stockpile stability, the management issues that should be considered include:

- Relevant sub-surface geology and geotechnical characteristics.
- Structure of the base and sub-base including the ability to protect groundwater from rainwater leaching of the materials held in the stockpile.
- Likelihood of stockpile failure due to:
 - Poor design and management including excessive height and side slope gradients.
 - Decreased internal friction caused by water inundation or gas generation or other pressure on or within the stockpile.

- Proximity of the stockpile to extraneous sources of ground vibrations including railway lines, or other heavy vehicle movements or building activities.
- Materials handling procedures to prevent stockpile collapse.
- Topography of the land where the stockpile is placed and climatic conditions of the area.

3.6.3.5 MATERIAL FLOW AND MANAGEMENT

The volumes of material required on site can vary considerably depending on the nature of the markets that the activity is supplying or targeting. Stockpiling needs to be conducted with material flow and site capacity in mind. That is, the stockpiling of materials must not be a process of continual growth but needs to be a balanced and systematic approach to materials input, processing, output, storage, reuse or sale and removal offsite, to demonstrate responsible and sustainable management for recycling and reuse.

Material flow will be adequately managed to minimise build-up of waste will occur in the unprocessed waste stockpiles area during unexpected machinery break down. Multiple machines are to be maintained on-site to ensure waste processing streams can continue in the event of equipment failure. If required, additional machinery will be hired. Approved hire operators are detailed in the Concrush *Approved Current Waste Contractor List* displayed in the weighbridge office and the administration office.

Additionally, material flow will be managed to ensure that the waste receipt protocols operate in a manner which does not cause delivery vehicles to queue onto Racecourse Road. Concrush maintain sufficient parking and queuing capacity to adequately manage peak flows, further details are provided in the Concrush *Traffic Management Plan – Operational Phase*.

3.6.3.6 COMMUNITY CONSULTATION

- Depending on the location, potential off-site risks and the level of community interest associated with an activity, an appropriate level of community consultation may need to be undertaken both at the planning and operational stages of stockpiling activities.
- In such cases, stakeholders including surrounding communities and local residents will be advised on issues such as storage duration, potential risks and impacts, and the related mitigation and management measures implemented by Concrush.

3.7 WASTE PROCESSING

The Concrush site currently processes two key waste streams, namely building and demolition waste and garden, as detailed below:

3.7.1 BUILDING AND DEMOLITION WASTE

Building and demolition waste describes the waste received at the site from customer delivered loads which is further processed at the site to form various ‘fit for purpose’ recycled aggregate products.

The building and demolition waste process is summarised below:

- Building and demolition materials are delivered to the Concrush site for disposal and recycling by commercial, industrial and residential customers.
- Each load of building and demolition material delivered is inspected in accordance with the procedure described in Section 3.2.
- Material from accepted loads is pushed up onto the building and demolition stockpile.

- Material from the building and demolition stockpile is then fed using an excavator into the primary jaw crusher/cone crusher/multi deck screens depending on the waste being processed and the product being made. As part of the crushing/screening process, foreign materials are automatically separated from the demolition material by a series of magnets, vacuum extractors and manual pickers. Separated foreign material is segregated for off-site disposal.
- The materials are currently crushed and screened into the following products:
 - -20mm Blended Base.
 - -40mm Blended Subbase.
 - -5mm Crusher Dust.
 - 10mm Aggregate.
 - 20mm Aggregate.
 - 70mm Cobble.
- The material is then stockpiled according to product type and size in accordance with waste storage procedures detailed in Section 3.4.
- Recycled aggregate products are assessed under the *Concrush Recovered Aggregate Order 2021* for re-use under *The Concrush Recovered Aggregate Exemption 2021*. Further detail of assessment requirements associated with the Concrush aggregate order and exemption framework is detailed in Section 3.8.
- Materials classified as being compliant with *The Concrush Recovered Aggregate Order 2021* are recorded as being compliant on the live site plan.
- Materials from stockpiled material determined to be compliant with *The Concrush Recovered Aggregate Order 2021* are further graded as detailed:
 - Specified Material: Products which meet various industry specifications and/or requirements which may be requested by the customer. Materials classified as being compliant with a particular industry specifications and/or customer requirement are stored in a designated specified sales stockpile and recorded accordingly on the live site plan. Samples of specified material can also be tested for quality assurance confirmation at the request of the customer.
 - Non-specified Material: Products which do not meet requested industry specifications and/or requirements may be:
 - Stored in a designated non-specified sales stockpile and recorded accordingly on the live site plan.
 - Re-processed and re-tested for industry specifications and/or customer requirements.
 - Documentation regarding testing of specification materials is recorded in the *Concrush Materials Evaluation Register* and the *Concrush Certified Stockpile Register*.
- Materials classified as being non-compliant with *The Concrush Recovered Aggregate Order 2021* are recorded as being non-compliant on the live site plan. Further details regarding assessment under *The Concrush Recovered Aggregate Order 2021* and management of non-compliant stockpiles are detailed in Section 3.8.

A workflow diagram of the building and demolition waste material process is presented in Appendix D.

The Material Data Safety Sheet (MSDS) – Concrush Recovered Aggregate developed for the product is presented in Appendix H and is to be displayed at key locations across the site.

3.7.2 GARDEN WASTE

Garden waste describes waste received at the site from customer-delivered loads which comprises of mulch and/or garden organics which are further processed at the site to form 'fit for purpose' recycled pasteurised garden organic products.

The garden waste process is summarised below:

- Garden waste materials are delivered to the Concrush site by commercial, industrial and residential customers.
 - Each load of garden material delivered is inspected in accordance with the procedure described in Section 3.2.
 - Material from accepted loads is pushed up onto the raw garden organics stockpile. When the stockpile size reaches approximately 200 t a contractor with a mobile shredder is brought to site to mulch the stockpiled green waste to create the raw coarse mulch.
 - The raw coarse mulch material is deposited in a raw coarse mulch windrow. The raw coarse mulch windrow is recorded on the live site plan with the material description, process date and a Lot Number (assigned from the *Concrush Pasteurisation Test & Sampling Log Book*, located in the weighbridge office).
 - The pasteurised garden organics procedure is summarised below:
 - Pasteurisation is a process which significantly reduces the number of plant and animal pathogens, plant fungi, and bacterial present in organic material. At the Concrush site, raw coarse mulch is pasteurised in accordance with *The pasteurised garden organics order 2016*.
 - The raw coarse mulch windrow is pasteurised to produce pasteurised coarse mulch using the following method:
 - The temperature of the raw coarse mulch windrow is taken on a weekly basis and recorded in the *Concrush Pasteurisation Test & Sampling Log Book* (located in the weighbridge office) and the *Concrush Pasteurisation Test & Sampling Register* (digital). Temperatures are taken from the core of the stockpile using the long temperature probe.
 - When the temperature of the raw coarse mulch windrow core reaches a minimum of 55°C the windrow core temperature is required to be recorded on a daily basis.
 - Once a minimum temperature of 55°C is recorded for three consecutive days, the raw coarse mulch windrow can be turned over using an excavator. The raw coarse mulch windrow must be turned to ensure both the outside and inside material are mixed. Details of the temperature and date of turning are recorded in the *Concrush Pasteurisation Test & Sampling Log Book* and the *Concrush Pasteurisation Test & Sampling Register*.
 - The process of daily temperature measurements and turning of the raw coarse mulch windrow is continued until it has been turned a total of three times, with core temperatures of 55°C or higher recorded for three consecutive days before each turn. After this time, the pasteurisation process is complete.
 - The raw coarse mulch windrow is then re-named the pasteurised coarse mulch windrow and recorded on the *live site plan* with the material description, process date and a Lot Number (assigned from the *Concrush Pasteurisation Test & Sampling Log Book* and the *Concrush Pasteurisation Test & Sampling Register*).
- Note:** If garden organic material is received which has a higher risk of containing pathogens, for example, organic materials containing manure, then the pasteurisation process must be continued for at least 15 days at temperatures of 55°C or greater, and the stockpile must be turned over a minimum of five times.
- Pasteurised organic products are assessed under *The pasteurised garden organics order 2016* for use under *The pasteurised garden organics exemption 2016*. Further detail of assessment requirements associated with the pasteurised order/exemption framework is detailed in Section 3.8.

- Materials classified as being compliant with *The pasteurised garden organics order 2016* are recorded as being compliant on the live site plan. Documentation regarding product compliance with *The pasteurised garden organics order 2016* is provided to the customer upon request.
- Pasteurised coarse mulch material from the pasteurised coarse mulch windrow is ready for sale as coarse (forest) mulch.
- Pasteurised coarse mulch can undergo further screening processes to produce a fine (premium) mulch product and is recorded as such on the live site plan.
- Materials classified as being non-compliant with *The pasteurised garden organics order 2016* are recorded as being non-compliant on the live site plan. Further details regarding assessment under *The pasteurised garden organics order 2016* and management of non-compliant stockpiles are detailed in Section 3.8.2.

A workflow diagram of the garden waste material process is presented in Appendix E.

Concrush must ensure garden waste leachate is not reused outside of the garden and wood waste leachate barrier system, unless written approval has been granted by the EPA. Leachate management is detailed in the *Water Discharge Management Plan*.

3.8 ASSESSMENT OF WASTE MATERIALS TO INDUSTRY SPECIFICATIONS

Building and demolition waste is assessed according to Institute of Public Works Engineering Australia New South Wales, *Specification for Supply of Recycled Material for Pavements, Earthworks and Drainage*, 2010 (IPWEA 2010) and the Roads and Maritime Services, *QA Specification 3051 - Granular Pavement Base and Subbase Materials* (RMS 3051).

The following material types are tested against the IPWEA 2010 Specification:

- -20mm Blended Base.
- 10mm Aggregate.
- 20mm Aggregate.
- 70mm Cobble.

The following material types are tested against the RMS 3051 Specification:

- -40mm Blended Subbase.
- -5mm Crusher Dust.

3.9 ASSESSMENT OF WASTE MATERIALS UNDER THE RESOURCE RECOVERY FRAMEWORK

The Concrush site currently processes two key waste streams, namely building and demolition waste and garden waste.

The building and demolition waste is processed at the site to form various ‘fit for purpose’ recycled aggregate products. These aggregate products are assessed under *The Concrush Recovered Aggregate Order 2021* for use under *The Concrush Recovered Aggregate Exemption 2021*, both documents and presented in Appendix F.

The garden waste is processed at the site to form ‘fit for purpose’ recycled pasteurised organic products. These pasteurised organic products are assessed under *The pasteurised garden organics order 2016* for use under *The pasteurised garden organics exemption 2016*, both documents and presented in Appendix G.

The key requirements of the applicable resource recovery orders are detailed below.

3.9.1 CONCRUSH RECOVERED AGGREGATE ORDER 2021

The *Concrush Recovered Aggregate Order 2021* is issued by the NSW EPA under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014 and imposes the requirements that must be met for the supply of Concrush recovered aggregate under *The Concrush Recovered Aggregate Exemption 2021* for use as roadbase material, drainage aggregates and packing fines.

Concrush recovered aggregate is defined in the order as a mixture of aggregates and sand from original concrete that contains hydrated lime and other cementitious materials, recycled concrete (including washout material and wet concrete), bricks, tiles, gravel, asphalt and roadbase.

3.9.1.1 SAMPLING AND ASSESSMENT PLAN

The order requires preparation of a written sampling plan which includes a description of sample preparation and storage procedures for the Concrush recovered aggregate. For the purposes of this order it is considered that the broader material management and storage procedures are adequately described in the various sections of this OWMP. Additional details specific to the order are detailed below:

- All composite samples are collected in accordance with the Australian Standard 1141.3.1-2012 *Methods for sampling and testing aggregates – Sampling – Aggregates 2012*:
 - Generally, a five (5) part composite sample is collected by hand from each stockpile. Each composite increment (discrete sample) is collected from various accessible locations around the stockpile perimeter to ensure representative samples are collected.
 - The mass of each composite increment (discrete sample) is determined in accordance with AS1141.3.1:2012 pending on the nominal particle size, as detailed below:

TABLE 3.1 COMPOSITE SAMPLE MASS

NOMINAL SIZE (mm)	75	40	28	20	14	10	7	5	<5
EACH DISCRETE SAMPLE MASS (kg)	10	6	5	4	3	2	2	1	1
TOTAL MASS FOR COMPOSITE SAMPLE (kg)	50	30	25	20	15	10	10	5	5

- The location of each composite increment (discrete sample) is recorded on a site plan which is referenced against the live site plan on the day of sampling.
- Typical approximate stockpile volume, incremental sample size and quarterly production rates are detailed in Table 3.2 below:

TABLE 3.2 TYPICAL APPROXIMATE STOCKPILE VOLUMES AND QUARTERLY PRODUCTION RATES

AGGREGATE PRODUCT	INCREMENTAL SAMPLE SIZE (kg)	TYPICAL STOCKPILE VOLUME (T)	STOCKPILES PRODUCED PER QUARTER
-20 mm Blended Base	4	4000	2
-40 mm Blended Subbase	6	4000	2

AGGREGATE PRODUCT	INCREMENTAL SAMPLE SIZE (kg)	TYPICAL STOCKPILE VOLUME (T)	STOCKPILES PRODUCED PER QUARTER
-5 mm Crusher Dust	1	2000	1
10 mm Aggregate	2	2000	1
20 mm Aggregate	4	2000	1
70 mm Cobble	10	2000	1

- A single discrete 500 mL asbestos sample is collected from each stockpile in accordance with Section 4.7.5 of the order and analysed in accordance with Australian Standard AS4964-2004, *Method for the qualitative identification of asbestos in bulk samples* to be reported as “asbestos detected” and the type of asbestos, or “no asbestos detected”.
- All samples are submitted for analysis of the various analytes listed in Column 1 of Table 1 of the order under chain of custody (COC) documentation to a laboratory accredited with the National Association of Testing Authorities (NATA) to perform the required analysis according to the specified methodology. Composite samples are to be homogenised and reduced to appropriate test volumes by the laboratory in accordance with AS1141.3.1:2012 using a riffle box or by quartering to produce a sub-sample.
- The Concrush recovered aggregate may be considered to be generated as part of a continuous or batch process, which have specific sampling and testing requirements as detailed:

Continuous process:

- Sampling and testing is undertaken in accordance with clause 5.2 of the order such that every stockpile of material designated for sale is assessed. As a minimum the material being produced each quarter must be assessed by collecting either 5 composite samples from every 4000 tonnes (or part thereof) processed or at least 5 composite samples (minimum 1 composite sample per stockpile).
- Analytical results from each stockpile assessed is compared to the absolute maximum concentration in Column 4 of Table 1 of the order.
- The arithmetic mean from the results of the combined routine sampling is calculated quarterly (every three months) and compared to the maximum average concentration for routine testing criteria in Column 3 of Table 1 of the order.
- Additionally, the arithmetic mean from the results of the combined routine sampling is calculated annually (every twelve months) and compared to the maximum average concentration for characterisation criteria in Column 2 of Table 1 of the order.
- Analysis results are considered to be non-compliant if:
 - Results from an individual composite sample (or individual stockpile) are in excess of the absolute maximum concentration in Column 4 of Table 1 of the order.
 - The arithmetic mean from the results of the combined routine sampling from the preceding three months is in excess of the absolute maximum concentration in Column 3 of Table 1 of the order.
 - The arithmetic mean from the results of the combined routine sampling from the preceding twelve months (as determined at the end of the calendar year) is in excess of the absolute maximum concentration in Column 2 of Table 1 of the order.
- Asbestos is reported as being present in the discrete sample.

Batch process:

- Sampling and testing is undertaken in accordance with clause 4.3 of the order such that one-off sampling of a batch, truckload or stockpile is assessed prior to sale, by collection of 10 composite samples from every 4,000 tonnes (or part thereof).
- Analytical results from each batch, truckload or stockpile assessed is compared to the maximum average concentration in Column 2 of Table 1 of the order and the absolute maximum concentration in Column 4 of Table 1 of the order.
- Analysis results are considered to be non-compliant if:
 - Results from an individual composite sample are in excess of the absolute maximum concentration in Column 4 of Table 1 of the order.
 - The arithmetic mean from the 10 composite samples (i.e. the specific batch, truckload or stockpile being assessed) is in excess of the maximum average concentration in Column 2 of Table 1 of the order.

3.9.1.2 REPORTING AND COMPLIANCE

Assessment of compliance is undertaken as detailed:

- Continuous process: For every stockpile designated for sale, and at the end of each quarter and the end of each year.
- Batch process: For each batch, truckload or stockpile assessed.
- In accordance with clause 4.8 of the order Concrush must, on or before each transaction, provide the following to each person to whom the processor supplies Concrush recovered aggregate:
 - A written statement of compliance certifying that all the requirements set out in this order have been met.
 - A copy of 'The Concrush Recovered Aggregate Exemption 2021', or a link to the Concrush website where the Concrush Recovered Aggregate Exemption 2021 can be found.
 - A copy of the 'The Concrush Recovered Aggregate Order 2021' or a link to the Concrush website where the Concrush Recovered Aggregate Order 2021 can be found.

The statement of compliance and links to 'The Concrush Recovered Aggregate Exemption 2021' and 'The Concrush Recovered Aggregate Order 2021' are provided on all delivery dockets, invoices, quotes, product data sheets, emails and website, and can be provided via a specific statement of compliance letter if required.

Additionally, if requested, Concrush must provide all sampling results to any consumer of the Concrush recovered aggregate.

In the case that non-compliant results are reported the material associated with the non-compliance is to be segregated and the NSW EPA is to be notified. Generally, the following actions should be undertaken:

- Segregation of the non-compliant material.
- Consultation with NSW EPA to agree on further action regarding isolated material:
 - Further sampling and analysis agreed to with the NSW EPA may provide additional information on the nature and extent of the reported non-compliance. Further testing may enable the EPA to conclude:
 - The material and process is in fact compliant.
 - Only a portion of the stockpile is non-compliant.
 - The whole stockpile is non-compliant.
 - The overall process is non-compliant.

- Non-compliant material may be suitable for consideration for a specific resource recovery exemption in accordance with the framework prescribed in the NSW Department of Environment, Climate Change and Water (DECCW) *Guidelines on resource recovery exemptions for the land application of waste materials as fill* 2011.
- Non-compliant materials which are not considered suitable for a specific resource recovery exemption are to be classified in accordance with the NSW EPA *Waste Classification Guidelines* 2014 and disposed off-site to a suitably licensed facility.

Concrush must notify the NSW EPA within 7 days of becoming aware that it has not complied with any requirement of the order.

All details associated with the above process, including the sample plan and sample collection records, analytical results and pertinent details of material sale must be kept for a period of six years and is to be provided to the NSW EPA on request.

The current order and exemption is valid to 21 December 2022 unless revoked by the EPA by notice in writing at an earlier date. Concrush must undertake liaison with the NSW EPA prior to this date to ensure that a new order and exemption can be issued prior to any sale of material in January 2022. At this point this OWMP must also be revised and updated accordingly.

It is noted that should the existing Concrush order/exemption not be re-issued in a timely manner it may be possible to assess any product produced for sale against the more stringent Resource Recovery Order under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014 – *The recovered aggregate order 2014* for use under *The recovered aggregate exemption 2014*.

It is noted that the above interpretation of the requirements of the Concrush order and exemption framework has been developed based on ongoing and evolving liaison with the NSW EPA. This OWMP should be provided to the NSW EPA for periodic review to ensure the procedures developed meet any changing EPA requirements or interpretations over time.

3.9.2 THE PASTEURISED GARDEN ORGANICS ORDER 2016

The pasteurised garden organics order 2016 is issued by the NSW EPA under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014 and imposes the requirements that must be met for the supply of pasteurised garden organics under *The pasteurised garden organics exemption 2016* for use as a soil amendment.

Pasteurised garden organics is defined in the order as mulch and/or garden organics that have undergone the process of pasteurisation as a minimum. The pasteurisation process adopted by Concrush is detailed in Section 3.6.2.

3.9.2.1 SAMPLING AND ASSESSMENT PLAN

The order requires preparation of a written sampling plan which includes a description of sample preparation and storage procedures for the Concrush recovered aggregate. For the purposes of this order it is considered that the broader material management and storage procedures are adequately described in the various sections of this OWMP. Additional details specific to the order are detailed below:

- The adopted sample density to assess the pasteurised garden organic material has been based on the Australian Standard AS4454:2012 Appendix A – *Methods for Sampling, Sample Handling and Preparation Prior to Analysis*, as such, the number of composite increments (discrete samples) required will depend on the total size of the pasteurised coarse mulch windrow, as detailed in Table 3.3.

TABLE 3.4 SUBSAMPLES REQUIRED FOR VARIOUS WINDROW SIZES

WINDROW VOLUME (m ³)	DISCRETE SAMPLES REQUIRED
<575	12

WINDROW VOLUME (m ³)	DISCRETE SAMPLES REQUIRED
1000	16
2000	23
3000	28
>3600	30

- The volume of each composite increment (discrete sample) required for windrow sampling when using the methodology nominated in AS4454:2012 typically depends on the particle size of the stockpile material being sampled. However, as the shredding process at Concrush produces raw coarse mulch over broad size range, an average particle size of 20 mm has been nominated for the purpose of composite increment (discrete sample) volume determination. In accordance with AS4454:2012, the volume required is 2.5 L for each composite increment (discrete sample).
- The collection of subsamples from the pasteurised coarse mulch windrow can be undertaken as detailed below:
 - When the pasteurised coarse mulch windrow has been mixed and turned over within 24 hrs of sampling the required number of composite increments (discrete samples) can be collected using a spade and bucket from random positions over the exterior of the stockpile.
 - When the pasteurised coarse mulch windrow has not been mixed and turned over within 24 hrs of sampling the required number of composite increments (discrete samples) can be collected using a frontend loader to dig or back-blade halfway into the stockpile to expose a near vertical cross-section face. Three to five composite increments (discrete samples) can be collected from each exposed face. Repeat the process, exposing as many cross-section areas needed to achieve the total number of composite increments (discrete samples) required.
- To assess whether the material contains asbestos in accordance with Section 5.2.1 of the order, a single discrete 500 mL sample is to be collected from each stockpile and analysed in accordance with Australian Standard AS4964-2004, *Method for the qualitative identification of asbestos in bulk samples* to be reported as “asbestos detected” and the type of asbestos, or “no asbestos detected”.
- All composite samples are submitted for analysis of the various analytes listed in Column 1 of Table 1 of the order under chain of custody (COC) documentation to a laboratory accredited with the National Association of Testing Authorities (NATA) to perform the required analysis according to the specified methodology detailed in the Australian Standard AS4454-2012 *Composts, soil conditioners and mulches, Appendix I - Method For Determination of Moisture Content And Level Of Visible Contamination*.
- Composite increments (discrete samples) are to be combined, homogenised and subsequently reduced to appropriate test volumes by the laboratory in accordance with AS4454:2012 using a riffle box or by quartering to produce an appropriately sized composite sub-sample (15 L for nominal particle size of 20 mm).
- Where possible, a second composite sample should be prepared and set aside in case additional or repeat testing is required. This should be stored (up to 3 months) in a labelled, unsealed container in a cool place away from direct sunlight.

Analytical results from each stockpile assessed is compared to the absolute maximum (% dry weight) criteria in Column 2 of Table 1 of the order.

Analysis results are considered to be non-compliant if:

- Results from an individual composite sample is in excess of the absolute maximum (% dry weight) in Column 2 of Table 1 of the order.
- Asbestos is reported as being present in the discrete sample.

3.9.2.2 REPORTING AND COMPLIANCE

In the case that non-compliant results are reported the material associated with the non-compliance is to be segregated (if possible) and the NSW EPA is to be notified. Generally, the following actions should be undertaken:

- Segregation of the non-compliant material.
- Re-sampling and/or re-analysis of non-compliant material to be undertaken to provide further information regarding the nature and extent of the impact.
- Consultation with NSW EPA to agree on further action regarding isolated material:
 - Non-compliant material may be suitable for consideration for a specific resource recovery exemption in accordance with the framework prescribed in the NSW Department of Environment, Climate Change and Water (DECCW) *Guidelines on resource recovery exemptions for the land application of waste materials as fill* 2011.
 - Non-compliant materials which are not considered suitable for a specific resource recovery exemption are to be classified in accordance with the NSW EPA *Waste Classification Guidelines* 2014 and disposed off-site to a suitably licensed facility.

Concrush must notify the NSW EPA within 7 days of becoming aware that it has not complied with any requirement of the order.

All details associated with the above process, including the sample plan and sample collection records, analytical results and pertinent details of material sale must be kept for a period of six years and is to be provided to the NSW EPA on request.

On or before each transaction, Concrush must provide a written statement of compliance certifying that all the requirements set out in this order have been met, as well as a copy of, or link to, the current order and exemption. Concrush must, on request, provide all sampling results to any consumer of the pasteurised garden organics.

The current order and exemption are valid until revoked by the EPA by notice published in the Government Gazette

It is noted that the above interpretation of the requirements of the pasteurised garden organics order and exemption framework has been developed based on ongoing and evolving liaison with the NSW EPA.

4 MANAGEMENT OF WASTE GENERATED ON-SITE

All waste streams will be managed in accordance with the principles of the waste hierarchy, with emphasis on reduce, reuse, recycle prior to disposal.

4.1 WASTE CLASSIFICATION AND MANAGEMENT

Table 4.1 provides a summary of the waste types at Concrush Pty Ltd, their typical source and the identified management / disposal options.

TABLE 4.1 – WASTE TYPES AND MANAGEMENT

WASTE TYPE	TYPICAL SOURCE	TYPICAL QUANTITY (PER YEAR)	MANAGEMENT
NON-PRODUCTION WASTES			
Printer/toner cartridges	Office areas	10 cartridges	Placed into recycling bins for collection by contractor
Paper	Office/Workshop areas	24 m ³	Placed into recycling bins for collection by contractor
Cardboard	Used as packaging for various items	24 m ³	Placed into recycling bins for collection by contractor
Co-mingled recyclables	Office, Crib Room, Workshop	4800 L	Placed into recycling bins for collection by contractor
Putrescible Waste	Waste from employees	480 L	Placed into general rubbish receptacles for collection by contractor
Solvents, fuels, oils grease or lubricants	Equipment and workshop/servicing areas	1200 L	Any excess solvents, fuels, oils or lubricants will be collected and stored in designated drums in an appropriately banded location prior to for collection by contractor
Oily rags and oil filters	Equipment and workshop/servicing areas	1 m ³	Placed into bins for collection by contractor
Waste coolant	Equipment and workshop/servicing areas	160 L	Collected and stored in designated drums in an appropriately banded location prior to for collection by contractor
Scrap metal	Equipment and workshop/servicing areas	5 T	Placed into bins for collection by contractor
Timber and Pallets	Product delivery	1 T	Stored on-site for collection by contractor

WASTE TYPE	TYPICAL SOURCE	TYPICAL QUANTITY (PER YEAR)	MANAGEMENT
Batteries	Expend batteries from vehicle fleet	4 batteries	Disposed of to an appropriately licenced waste facility
Tyres	Expend tyres from vehicle fleet	4 tyres	Disposed of to an appropriately licenced waste facility
PRODUCTION WASTES			
Metals removed during processing	Metals removed during processing	500 T	Reinforcing steel is stockpiled and collected by a contractor and transported off site for recycling at an appropriately licensed facility.
Plastic, timber and paper removed during processing	Minor amounts of plastic, timber and paper removed during processing	35 T	Plastic and paper are disposed of to an appropriately licenced waste facility. Separated timber material is transferred to the green waste raw stockpile for processing on site.
Processed garden organic waste	Material determined to be unsuitable for re-use under an applicable resource recovery order/exemption	Not expected under normal operations	Disposed of to an appropriately licenced waste facility
Processed construction and demolition waste	Material determined to be unsuitable for re-use under an applicable resource recovery order/exemption	Not expected under normal operations	Disposed of to an appropriately licenced waste facility
Non-recyclable waste materials including ACM, potential ACM (including plaster or fibre products) or potential coal-tar products (asphalt containing naphthalene odour or otherwise confirmed via testing)	Unsuitable materials observed at Checkpoint 1,2 or 3.	Unsuitable materials not accepted on-site under normal operations	Material rejected in accordance with rejected load policy
Leachate	Green waste stockpiles and mulch stockpiles	Leachate is not discharged under normal operations	Waste water management system

Any waste material generated at the site will be classified in accordance with the NSW EPA *Waste Classification Guidelines* 2014 and will be segregated and stored in an appropriate area, with bunding if required.

All general waste generated by site personnel will be accommodated through the use of a 240-litre municipal waste bin to be collected by Council or a licensed contractor for disposal/recycling at an appropriate waste management facility.

4.2 WASTE MINIMISATION PROCEDURES

The following waste management actions will be put into practice to minimise the accumulation / generation of non-production waste at the Concrush Pty Ltd site:

- All personnel working on site will undergo a site induction. The site induction will include an overview of the waste management measures at the site.
- Designated colour coded bins are placed within the Concrush facility to assist with segregation of waste and recyclable materials.
- Clear instructions will be posted within the Lunch Room detailing recycling and waste separation information.

The following waste management actions will be put into practice to minimise the accumulation / generation of production waste at the Concrush Pty Ltd site:

- Concrush does not allow for non-recyclable waste materials to be received on-site.
- Concrush does not accept any asbestos containing materials (ACM), potential ACM (including plaster or fibre products) or potential coal-tar products (asphalt containing naphthalene odour or otherwise confirmed via testing).

4.3 OFF-SITE DISPOSAL AND TRANSPORT OF WASTES

With the exception of material which has been rejected from the facility at Inspection Points 1, 2 or 3 construction waste must not be transported from the facility unless it has already been inspected, processed and classified in accordance with this OWMP and must consist solely of a single listed waste type which meets the requirements of one of the following resource recovery orders:

- *The Concrush Recovered Aggregate Order 2021.*
- *The recovered aggregate order 2014.*
- *The pasteurised garden organics order 2016.*
- A site-specific resource recovery order undertaken in liaison with the NSW EPA.

All other waste material must be classified in accordance with the NSW EPA *Waste Classification Guidelines* 2014 and are to be removed by an appropriately licensed contractor for disposal to a suitably licensed waste facility.

The Concrush *Approved Current Waste Contractor List* is displayed in the weighbridge office and the administration office.

The *Development Consent (SSD 8753)* requires that Concrush must retain all sampling and waste classification data for the life of the development in accordance with the requirements of the NSW EPA.

5 ADDITIONAL REPORTING REQUIREMENTS

5.1 MONTHLY WEIGHBRIDGE REPORTING

Data from the weighbridge system is used to report monthly WASTE IN and WASTE OUT to the EPA in order to ensure compliance with the material cap.

5.2 EPL MONITORING AND ANNUAL RETURN

Concrush must complete and supply to the NSW EPA an Annual Return in the approved form comprising the following items:

- Statement of Compliance.
- Monitoring and Complaints Summary.
- Statement of Compliance - Licence Conditions.
- Statement of Compliance - Load based Fee.
- Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan.
- Statement of Compliance - Requirement to Publish Pollution Monitoring Data.
- Statement of Compliance - Environmental Management Systems and Practices.

The Annual Return for the reporting period must be supplied to the NSW EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date'). The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

Any monitoring data required by the EPL must also be recorded with all pertinent details and retained for 4 years after the monitoring or event to which they relate took place and be able to be produced in a legible form to any authorised officer of the EPA.

6 TRAINING

Concrush Pty Ltd employees and relevant subcontractors are trained in environmental awareness via site-specific inductions that incorporate basic waste management awareness training, risk assessments, incident investigations and communication meetings/tool box talks.

All employees and contractors will be aware of the relevant site procedures in relation to the appropriate disposal of waste as part of day to day operations at the site.

Additionally, all personnel undertaking inspections at either Inspection Point 1 or 2 shall have undertaken training in the following:

- General obligations of the facility under the *Protection of the Environment Operations Act 1997* and the Regulation.
- Relevant facility-specific obligations in relation to *The Concrush Recovered Aggregate Order 2021* and Environmental Protection Licence (ref. 13351).
- Successful completion of a nationally accredited asbestos awareness course for inspection.

Records of training for individual staff members involved in undertaking inspections to comply with the *Protection of the Environment Operations Act 1997* and training needs will be kept by Concrush and made available to an authorised officer of NSW EPA if requested.

Details of all training requirements are maintained in the Concrush *Competency Training Matrix Needs Analysis* (digital).

Note: Currently, if asbestos is identified in materials at either Inspection Points 1 or 2 it will be the producer's obligation to remove the waste from site. As such no asbestos collection or removal should be undertaken by Concrush staff. However, if asbestos removal is ever undertaken by or on behalf of Concrush, this must be undertaken by licenced Class A (friable) or Class B (non-friable) asbestos removalists. The need for Class A or Class B Asbestos Removal and the relevant controls and SafeWork NSW notifications required will depend upon the nature of material encountered. Further guidance is provided in Safe Work Australia, *Model Code of Practice: How to safely remove asbestos*, August 2019.

7 ROLES AND RESPONSIBILITIES

Concrush have designated the following roles and responsibilities to the various organisational levels responsible for operations on-site

7.1 DIRECTOR (KEVIN THOMPSON – 0408 687 093)

- Ensure operations comply with site EPL.
 - Ensure operations comply with all relevant legislation and regulation.
 - Ensure any pollution or safety incidents are reported to the relevant authorities and stakeholders.
 - Ensure all staff have required training and tickets.
-

7.2 BUSINESS MANAGER (HELEN MILNE - 0405 511 503)

- Ensure the required documentation and records are kept and supplied as required in accordance with the EPL.
 - Ensure implementation of the most recent version of the OWMP approved by the Planning Secretary.
 - Ensure DPIE is notified of any non-compliance with any part of the development consent conditions.
 - Maintain the following registers and plans:
 - Concrush Rejected Load Register.
 - Concrush Training Program Register. *Concrush Competency Training Matrix Needs Analysis* (digital).
-

7.3 SALES AND TECHNICAL MANAGER (ROSS LO MONACO - 0428 329 903)

- Ensure site operations comply with the conditions of the relevant resource recovery orders and exemptions.
- Undertake liaison with the NSW EPA regarding interpretation of the of relevant resource recovery orders and exemptions.
- Direct consultants to undertake sample collection, analysis and reporting required under the required by the relevant resource recovery orders and exemptions and this OWMP.
- Ensure the required documentation and records are kept and supplied as required in accordance with the relevant resource recovery orders and exemptions.
- Ensure the NSW EPA is notified of any non-compliance with any part of the relevant resource recovery orders and exemptions.
- Ensure the Concrush recovered aggregate order and exemption is revised and renewed as required.
- Management and oversight of the Waste Monitoring Program.
- Maintain following registers and plans:
 - *Concrush Materials Evaluation Register.*
 - *Concrush Certified Stockpile Register.*
 - *Concrush Pasteurised Organics Test & Sample Register.*

7.4 WEIGHBRIDGE MANAGER (PAT BRADLEY - 0401 804 556)

- Provide site inductions and training to all weighbridge and retail area personnel accessing the site.
- Monitor inspection points 1, 2 (retail) and 3 operations to ensure that all waste received is appropriately screened, segregated, stored and documented in accordance with this OWMP.
- Ensure rejected load forms are completed as per the Standards for managing construction waste in NSW and forward to Helen Milne to be recorded in the register.
- Maintain following registers and plans:
 - *Concrush Rejected Loads Register.*

7.5 PRODUCTION MANAGER (DAVID CROSS – 0420 832 833)

- Monitor site operations to ensure that all waste received is appropriately screened, segregated, stored and documented in accordance with this OWMP.
- Provide site inductions and training to all personnel accessing the site.

7.6 WASTE INSPECTION PERSONNEL

7.7 MONITOR SITE OPERATIONS TO ENSURE THAT ALL WASTE RECEIVED IS APPROPRIATELY SCREENED, SEGREGATED, STORED AND DOCUMENTED IN ACCORDANCE WITH THIS OWMP. GENERAL EMPLOYEES AND SUBCONTRACTORS

- Follow site induction waste management measures.
- Ensure any pollution or safety incidents are reported to their manager.

7.8 LICENSED CONTRACTORS

- Transport, handling and disposal of all wastes in compliance with all state and federal regulations.

8 REVIEW AND REVISION OF OPERATIONAL WASTE MANAGEMENT PLAN

The procedures contained within this management plan should be reviewed annually, and updated as required or when any of the following occur:

- Changes to legislative and regulatory requirements, including the completion of key stages detailed in the *Development Consent (SSD 8753)*. Key stages defined in the consent include Stage 1 construction, Stage 1 operations, Stage 2 constructions and Stage 2 operations.
- Any other changes to site processes / operations.
- The management plan is found to be inadequate for any reason.

With approval from the Planning Secretary, the consent conditions allow for any strategy, plan or program to:

- Be provided on a staged basis and/or combined and updated as appropriate.
- Be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.
- Supersede the previous versions and must be implemented in accordance with the relevant conditions.

Additionally, the consent conditions detail that the OWMP must be reviewed, and the Planning Secretary must be notified in writing that a review is being carried out, within three months of the following:

- The submission of an incident report.
- The submission of an Independent Environmental Audit.
- The approval of any modification of the conditions of the consent.
- The issue of a direction of the Planning Secretary which requires a review to be conducted.

APPENDIX A

WEIGHBRIDGE NON-TRANSACTIONS



APPENDIX B

REJECTED LOAD POLICY AND FORMS



APPENDIX C

INSPECTION POINT PROCEDURES AND FORMS



APPENDIX D

BUILDING AND DEMOLITION WASTE MATERIAL PROCESS



APPENDIX E

GARDEN AND WOOD WASTE MATERIAL PROCESS



APPENDIX F

CONCRUSH RECOVERED AGGREGATE
ORDER AND EXEMPTION



APPENDIX G

PASTEURISED GARDEN ORGANICS
ORDER AND EXEMPTION



APPENDIX H

SAFETY DATA SHEET – CONCRUSH
RECOVERED AGGREGATE

