

WASTE MANAGEMENT PLAN



SMEATON GRANGE

August 2019

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1. INTRODUCTION

1.1 BACKGROUND

Benedict Recycling Pty Ltd (Benedict) is the operator of the Smeaton Grange waste recycling and transfer facility (the facility) at 52 Anderson Road, Smeaton Grange (the site).

This document is a waste management plan (WMP) for the facility required by Condition B56 of the Stage significant development (SSD) consent (Ref: SSD 7424) (the consent).

The consent was originally approved on 22 December 2017 for construction and operation of a resource recovery facility to process up to 140,000 tonnes per annum (tpa) of general solid waste (non-putrescible). A modification (MOD 1) to the consent was approved on 10 September 2018.

1.2 LOCATION

The site is in the local government area (LGA) of Camden, NSW. The legal description of the site is Lot 319 DP 1117230 and it is approximately 7,862 m² in size. The site is at the eastern edge of the Smeaton Grange industrial precinct. A site location plan and a site layout plan are provided in Figures 1.1 and 1.2, respectively.

1.3 PURPOSE OF THE WASTE MANAGEMENT PLAN

The purpose of this WMP is to meet the requirements of the consent as outlined in Table 2.1.

Table 2.1 – Compliance table (SSD 7424)

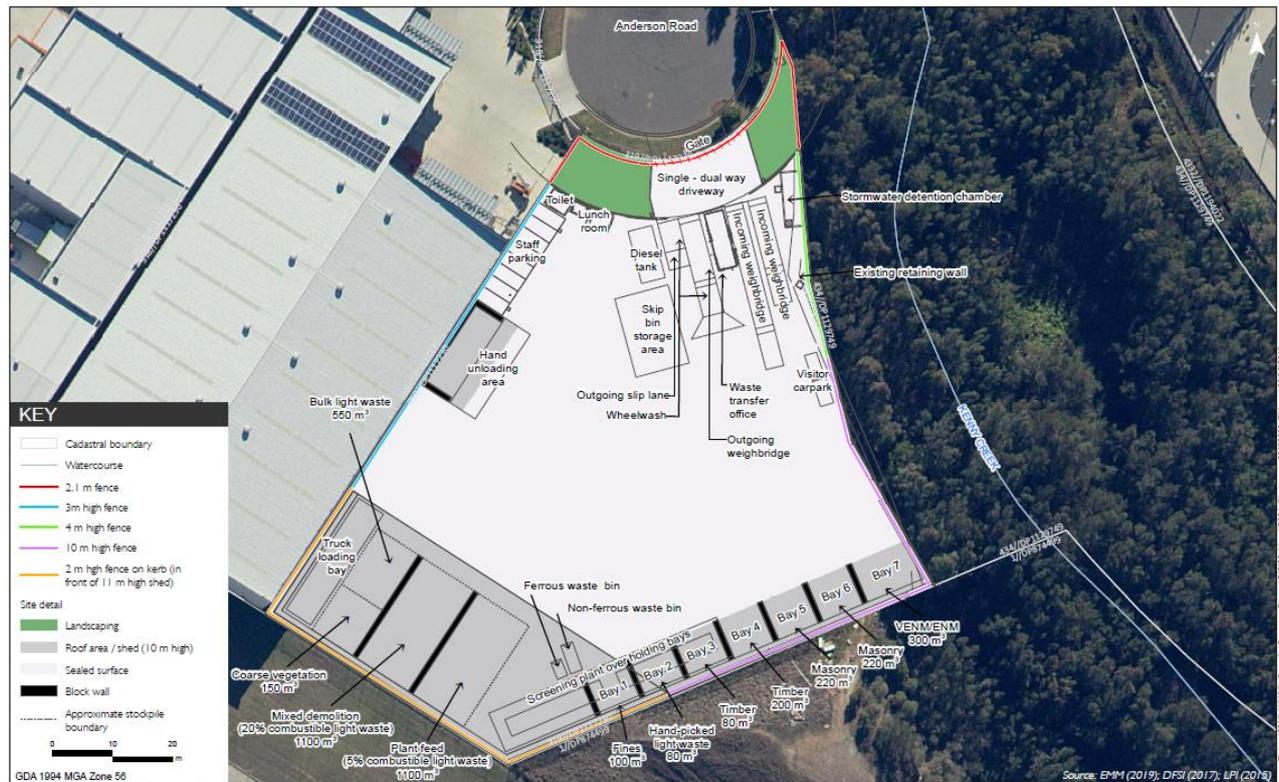
| Condition | Requirement | Where Addressed in WMP |
|------------|---|---------------------------|
| A6 | The Applicant must not receive or process on site more than 140,000 tpa of general solid waste (non-putrescible). | Section 2.2 |
| A7 | The Applicant must not exceed the maximum stockpile volumes detailed in the consent. | Section 2.3 and Table 2.3 |
| A11 | The Applicant must retain all weighbridge records as required by the NSW Protection of Environment and Operation (Waste) Regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Secretary and/or the EPA. | Section 5.1 |
| A12 | The Applicant must retain waste classification records for all waste received on the site and waste disposed from the site for the life of the development. The waste classification records must be made immediately available on request by the EPA and/or the Secretary. | Sections 5.1 and 5.2 |

| | | |
|------------|--|-----------|
| B56 | From the commencement of operation, the Applicant must implement a Waste Monitoring Program. | Chapter 5 |
|------------|--|-----------|

Figure 1.1 – Site location plan



Figure 1.2 – Site layout plan



2. WASTE TYPES AND QUANTITIES

Only 'pre-classified general solid waste (non-putrescible) waste' as defined by the NSW Environment Protection Authority's (EPA) *Waste Classification Guidelines - Part 1: Classification of Waste* (the guidelines) are to be accepted by the facility. No special, liquid, hazardous, restricted solid waste or general solid waste (putrescible), as defined by the guidelines, are to be accepted.

The sources and types of wastes will vary. An estimate of the proportion of wastes and the corresponding recycled products is provided in Table 2.2 based on the other inert waste recycling plants operated by Benedict Recycling.

All of the materials brought onto the site are to be taken from the site as products, as recyclable materials requiring further processing, or as non-recyclable residues (e.g. rubbish or spoiled recyclables such as contaminated paper/cardboard) for disposal at an EPA licensed landfill.

Table 2.2 – Accepted waste types and quantities

| Waste types | Proportion ¹ | Other limits |
|--|-------------------------|--|
| Soils and fines from excavated materials | 33% | Soils that meet the CT1 thresholds for General Solid Waste in Table 1 of the guidelines |
| Concrete, excavated materials, bricks, rail ballast and spoils ('fines' with a particle diameter of less than 8 mm) | 26% | Must not contain any contaminant levels exceeding the limits for General Solid Waste stated in the guidelines |
| Concrete, excavated materials, rail ballast and spoils (material with a particle diameter of greater than 8 mm) | 19% | Must not contain any contaminant levels exceeding the limits for General Solid Waste stated in the guidelines. |
| Clean timber, coarse vegetation | 5% | Clean timber to be non-CCA [copper chrome arsenic]-treated |
| Metals | 2% | Predominantly steel |
| Rubbish to landfill (plastics, paper/cardboard, concrete-based building products (eg Hardiplank), minor amounts of plaster board, containers, carpet, synthetics, rags, etc) | 15% | Target of maximum 15% to be diverted to landfill |

Note: 1. Estimated proportion of annual waste accepted based on maximum 140,000 tpa.

2.1 SITE BASED WASTE ACTIVITIES

The NSW *Protection of the Environment Operations Act 1997* (POEO Act) requires companies or organisations carrying out activities that have a potential to affect the environment to obtain an Environment Protection Licence (EPL) from the EPA.

The POEO Act 1997 Schedule 1, Part 1, Activities Premises Based, defines:

WASTE STORAGE

- (1) *This clause applies to waste storage, meaning the receiving from off site and storing (including storage for transfer) of waste.*
- (2) *However, this clause does not apply to any of the following:*
 - (a) *the storage of stormwater,*
 - (b) *the storage of up to 60 tonnes at any time of any of the following kinds of waste (but not when accompanied by any other kind of waste)*
 - (i) *drilling mud*
 - (ii) *grease trap waste*
 - (iii) *waste lead acid batteries*
 - (iv) *waste oil*
 - (c) *the storage of sewage within a sewage treatment system,*
 - (d) *the storage and transfer of liquid waste that is generated and treated on site prior to sewer discharge, or lawful discharge to waters.*
- (3) *The activity to which this clause is declared to be a scheduled activity if:*
 - (a) *more than 5 tonnes of hazardous waste, restricted solid waste, liquid waste or special waste (other than waste tyres) is stored on the premises at any time, or*
 - (b) *more than 5 tonnes of waste tyres or 500 waste tyres is stored on the premises at any time (other than in or in a vehicle used to transport the tyres to or from the premises), or*
 - (c) *more than the following amounts of waste (other than waste referred to in paragraph (a) or (b)) are stored on the premises at any time:*
 - (i) *in the case of premises in the regulated area – more than 1,000 tonnes or 1,000 cubic metres,*
 - (ii) *in the case of premises outside the regulated area – more than 2,500 tonnes or 2,500 cubic metres, or*
 - (d) *more than the following amounts of waste (other than waste referred to in paragraph (a) or (b)) is received per year from off site:*
 - (i) *in the case of premises in the regulated area – 6,000 tonnes*
 - (ii) *in the case of premises outside the regulated area – 12,000 tonnes.*
- (4) *For the purposes of this clause, 1 litre of waste is taken to weigh 1 kilogram*

RESOURCE RECOVERY

- (1) *This clause applies to the following activities:*
 - recovery of general waste**, *meaning the receiving of waste (other than hazardous waste, restricted solid waste, liquid waste or special waste) from off site and its processing otherwise than for the recovery of energy*
 - recovery of hazardous and other waste**, *meaning the receiving of hazardous waste, restricted solid waste or special waste (other than asbestos waste or waste tyres) from off site and its processing, otherwise than for the recovery of energy*
 - recovery of waste oil**, *meaning the receiving of waste oil from off site and its processing, otherwise than for the recovery of energy*

recovery of waste tyres, meaning the receiving of waste tyres from off site and their processing, otherwise than for the recovery of energy.

- (2) However, this clause does not apply to the recovery of stormwater or the processing of any of the following:
- (a) contaminated soil,
 - (b) contaminated groundwater,
 - (c) sewage within a sewage treatment system (whether or not that system is licensed).
- (3) Each activity referred to in Column 1 of the Table to this clause is declared to be a scheduled activity if:
- (a) it meets the criteria set out in Column 2 of that Table, and
 - (b) either
 - (i) less than 50% by weight of the waste received per year requires disposal after processing, or
 - (ii) an exemption granted under Part 9 of the Protection of the Environment Operations (Waste) Regulation 2014 exempts the person carrying out the activity from the requirements of section 48 (2) as they apply to waste disposal (application to land), waste disposal (thermal treatment), waste processing (non-thermal treatment) and waste storage.

| Column 1 | Column 2 |
|--|--|
| ACTIVITY | CRITERIA |
| <i>recovery of general waste</i> | <p><i>if the premises are in regulated area:</i></p> <ul style="list-style-type: none"> (a) involves having on site at any time more than 1,000 tonnes or 1,000 cubic metres of waste, or (b) involves processing more than 6,000 tonnes of waste per year <p><i>if the premises are outside the regulated area:</i></p> <ul style="list-style-type: none"> (a) involves having on site at any time more than 2,500 tonnes or 2,500 cubic metres, or (b) involves processing more than 12,000 tonnes of waste per year |
| <i>recovery of hazardous and other waste</i> | <i>involves having on site at any time more than 200 kilograms of waste</i> |
| <i>recovery of waste oil</i> | <i>involves processing more than 20 tonnes of waste oil per year or having on site at any one time more than 2,000 litres of oil.</i> |
| <i>recovery of waste tyres</i> | <i>involves having on site at any time (other than in or on a vehicle used to transport the tyres to or from the premises) more than 5 tonnes of tyres or 500 waste tyres,</i> |

| | | |
|--|--|---|
| | | <i>or involves processing more than 5,000 tonnes of waste tyres per year.</i> |
|--|--|---|

Benedict Recycling will apply for an EPL prior to the start of operations. It is noted that under Section 89K of the EP&A Act, an EPL cannot be refused if it is necessary for carrying out SSD that is authorised by a development consent.

2.2 QUANTITY OF WASTE TO BE RECEIVED/STORED

Condition A6 of the consent limits the amount of general solid waste (non-putrescible) to be received or processed on site to no more than 140,000 tpa.

2.3 STOCKPILE LIMITS

Condition A7 of the consent provides maximum stockpile volumes as detailed in Table 2.3.

Table 2.3 – Stockpile limits

| Stockpile | Waste type | Maximum volume |
|---------------------------|--|----------------------|
| Bay 1 | Fines (particles of less than 8 mm in diameter) | 100 m ³ |
| Bay 2 | Hand-picked light waste | 80 m ³ |
| Bay 3 | Timber | 80 m ³ |
| Bay 4 | Masonry | 220 m ³ |
| Bay 5 | Masonry | 220 m ³ |
| Bay 6 | Timber | 220 m ³ |
| Bay 7 | VENM/ENM | 300 m ³ |
| Skip bin adjacent Bay 1 | Ferrous waste | 220 m ³ |
| Skip bin adjacent Bay 1 | Non-ferrous waste | 9 m ³ |
| Processing shed – west | Bulk light waste | 2 m ³ |
| Processing shed - west | Coarse vegetation | 550 m ³ |
| Processing shed – central | Mixed demolition with a 20% combustible light weight component | 1,100 m ³ |
| Processing shed – east | Plant feed with a 5% combustible light waste component | 1,100 m ³ |

In the case of incoming loads of mixed waste, a sorting process is necessary to separate the various recyclable materials. Given the variable pattern of incoming waste traffic, the primary focus of the operation is to prevent wastes that are not approved to be accepted from being accepted, to complete this sorting process as efficiently as possible, to avoid a backlog of trucks and to prevent the formation of a larger than necessary stockpile in the incoming waste receipt area.

3. WASTE HANDLING/MANAGEMENT

Each load arriving at the facility is to be inspected and classified prior to the material being deposited on site. The methodology for waste load inspections is detailed and illustrated in the *Tip Inspecting Safe Work Procedure* attached in Appendix A.

All waste accepted shall be recorded on the facility's weighbridge system and a customer docket/receipt produced (see Appendix B).

The information recorded is to include:

- the date;
- vehicle registration number; and
- the type and weight of waste being delivered.

Incoming waste will be inspected at the weighbridge (and again after being tipped), see Section 4). Waste material that is unacceptable or specified prohibited from entering the site (see Appendix C) shall be refused entry and diverted to an appropriately licensed facility.

After leaving the weighbridge, each load is to be directed to the appropriate storage area by the site staff. All waste will be unloaded within the designated unloading area and be stored wholly within the designated waste stockpile areas in accordance with Condition A7 of the consent. Wherever possible raw materials are to be sorted at the source and directed into segregated stockpiles on-site.

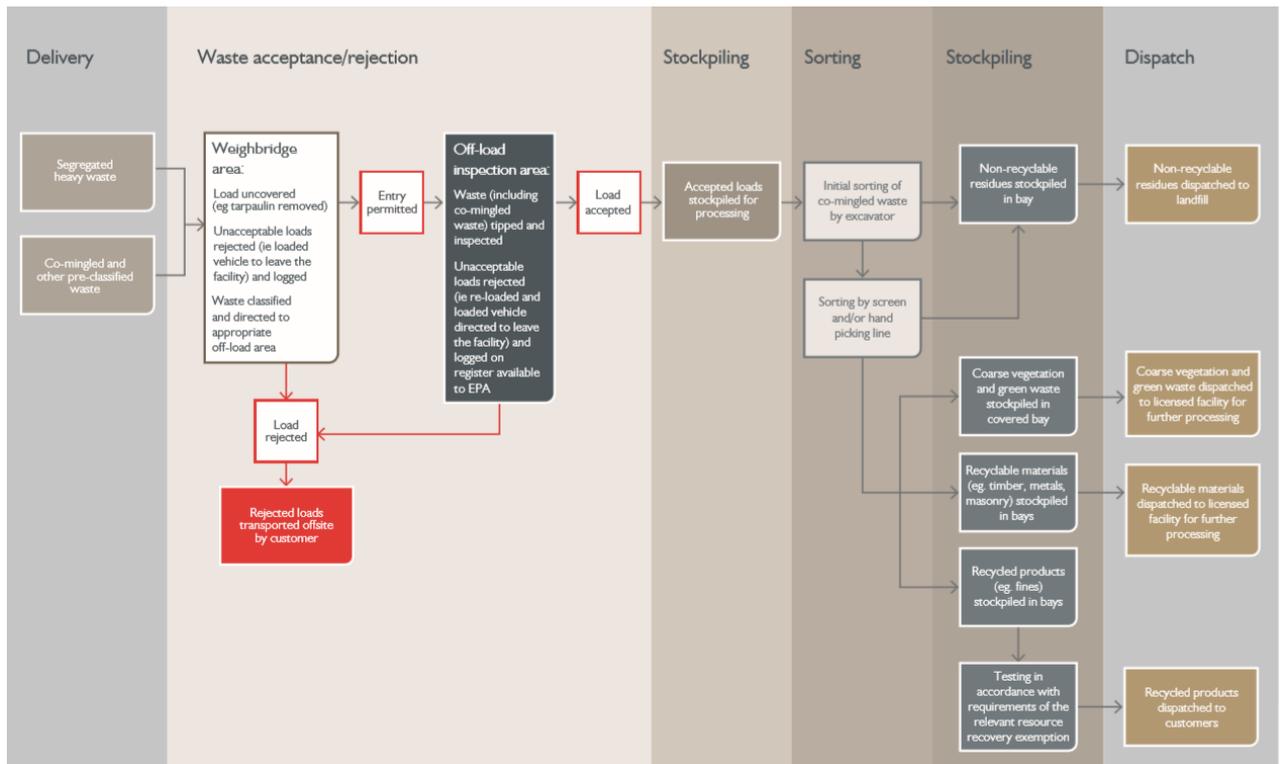
Unsorted materials are to be spread on the ground on-site, sorted into the various categories and formed into segregated stockpiles. The sorted waste material may be subject to processing depending on its category and presentation.

Processing on site may include screening and picking. The processed material is to be stockpiled into its various processed categories for return to the market as product(s).

In addition to waste received on site, waste generated on site both during construction works and resulting from general office activities is classified in accordance with the guidelines.

A flowchart outlining the key steps in the waste recycling and transfer process is provided in Figure 2.1 below.

Figure 2.1 – Waste flowchart



3.1 EQUIPMENT BREAKDOWNS

Unexpected machinery breakdown has the potential to result in waste processing delays and hence build-up of incoming waste. To avoid such a situation, all equipment on site is to be regularly serviced and maintained (usually by the original equipment manufacturer) and the Benedict fleet of mobile equipment (HME) is typically replaced after approximately 10,000 hours of service. As such, equipment reliability is high and major breakdowns typically minimising the potential for excessive build-up of incoming waste on site.

Nevertheless, should an unexpected breakdown of equipment occur in the incoming waste receival area, replacement equipment is to be deployed when necessary to ensure that stockpile limits are not compromised due to a build-up of waste. This replacement equipment may be redeployed from another part of the site, hired or sourced from another Benedict site.

In the event that mobile equipment (HME) is unavailable for more than 48 hours due to breakdown, contractual arrangements are to be put in place whereby the original equipment manufacturer is bound to make available replacement equipment for use until such time as the repairs are completed.

Where high volumes of incoming waste traffic coincide with an equipment breakdown event and a build-up of waste is anticipated, the volume and types of waste received are to be managed accordingly to ensure that stockpile limits can continue to be met. This may include, but not be limited to, diverting customers to other facilities.

4. NON-CONFORMING WASTE

Incoming waste is to be inspected in the following two stages:

- a preliminary inspection of the incoming waste on the vehicle at the weighbridge; and
- an inspection of the incoming waste after it is tipped off but before it is added to the appropriate feed stockpile (the customer will be required to wait until the waste has passed the inspection).

Details of any non-conforming waste loads are to be captured on the 'Notification of Non-Conforming Waste Form' (refer Appendix D) which is to be sent to the customer and filed on site. A log of all non-conforming loads is to be maintained in a central register that is available for EPA inspection.

The information recorded in the form and register is to include the following:

- date;
- carrier organisation/company;
- registration number of the vehicle; and
- type of waste.

Arrangements are to be made for the removal of any non-confirming waste for disposal at an appropriately licensed facility.

Should an incident occur in relation to a non-conforming waste, which poses a threat to the environment, the EPA is to be advised as soon as practical after the incident occurs.

The incident is to be reported by telephoning:

- EPA Newcastle office: 02 4908 6800; or
- EPA Pollution Hotline: 131 555.

Benedict will charge a re-loading fee to customers that tip waste that is found to contain any materials that the facility is not licensed to accept (e.g. putrescibles, hazardous, liquid and odorous waste). Benedict has found that customers who have a number of loads rejected and have to pay the re-loading fee, as a result of their rigorous inspection regime, stop using Benedict Recycling's facilities.

All staff directly involved in the inspection and classification of waste must be capable of identifying wastes that are not permitted to be disposed of at the facility. As such, basic internal training is to be carried out as required together with asbestos awareness training conducted by an external party which is scheduled annually as well as ad-hoc from time to time should there be any significant turnover of site staff.

5. WASTE MONITORING PROGRAM

Condition B56 of the consent requires that a waste monitoring program be prepared by a suitably qualified person to:

- monitor the quantity, type and source of waste received on site;
- monitor the quantity, type and quality of the outputs produced on site;

- ensure that all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at site; and
- ensure staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste including asbestos.

Benedict is committed to minimising the risks associated with the waste received and the products despatched from the site by undertaking the waste monitoring program as detailed below. This chapter forms the waste monitoring program. It was prepared by Alycia Campbell (Benedict Environmental Compliance Officer).

5.1 INCOMING WASTE RECEIPTS

The monitoring of the quantity, type and source of the waste received at the facility is to be recorded by the weighbridge software/system on a daily basis. An example of the information captured by the weighbridge software/system is shown in figure 5.1 below.

Figure 5.1 – Weighbridge information capture

The screenshot shows a software window titled 'EDITING DOCKET NO: N-062719 (01/02/2018 07:18:AM)'. The interface is organized into several panels:

- SYSTEM DETAILS:** Includes Site Prefix (N), Outgoing Load checkbox, and Registration No.
- TRUCK DETAILS:** Includes Driver Name, Hnd unload grp (GOOGLE), and a 'Waste Type' field highlighted with a red box and labeled 'Waste Type'.
- DATE DETAILS:** Includes Date In (01/02/2018) and Date Out (01/02/2018).
- CUSTOMER DETAILS:** Includes Customer Code (XODEF0), Customer Name (COD EFPOS B RECYCLING****CO), Customer Order No (GOOGLE), and Customer Address (****COD ONLY****). A red box labeled 'Source' points to this section.
- PRODUCT DETAILS:** Includes Product Code (DEMOT), Product Name (MIXED LIGHT BUILDING & DEMOLITION), Product Rate, and Bin Size (m3 Den 0.00).
- JOB DETAILS:** Includes Job No and Job Comments.
- CONTRACTOR DETAILS:** Includes Contractor Code, Contractor Name, and Instructions (HAND UNLOAD, MAYFIELD). A red box labeled 'Quantity' points to this section.
- CARTAGE DETAILS:** Includes Cartage type, Fixed (0), and Per tonne (0).
- EXTRAS DETAILS:** Includes Extra Code, Extra Name, Extra Rate, and Quantity.
- WEIGHTS/COSTS:** A table showing Tare (1.78), Gross (1.88), Net (0.10), Product (0.00), Cartage (0.00), Extras (0.00), and Total.

Whilst the ‘Customer Details’, ‘Truck Details’ and ‘Contractor Details’ information is to be entered on arrival, the specific information relating to waste type is to be confirmed when the incoming load is inspected and classified using the ‘Load Classification’ form as shown in Appendix B. All necessary sampling and waste classification records will be in-line with any EPL requirements. Each incoming load is to be assigned a ‘Product Code’ which has an associated ‘Product Name’.

5.2 OUTGOING PRODUCTS AND WASTE FOR DESPATCH

Materials leaving the site include:

- recycled products for re-use (compliant with Resource Recovery Orders);
- residual wastes to be further processed/lawfully recovered at a licensed waste facility; and
- residual wastes for disposal at a licensed waste facility.

The quantity, type and quality of the outputs produced on site are to be recorded by the same weighbridge software/system as that used to record incoming waste materials.

Recycled products for re-use are only to be approved for sale from the facility pending compliance with a variety of conditions as per specific Resource Recovery Orders issued by the EPA under clause 93 of the 2014 Waste Regulation.

5.3 MONTHLY EPA REPORTING

Under the POEO Act, all licence holders of levy liable waste facilities (i.e. landfills, waste recycling facilities, waste storage, and waste transfer facilities) must submit a Waste Contribution Monthly Report (WCMR). This report is submitted monthly on-line via the EPA's Waste and Resource Reporting Portal (WARRP), ensuring that there is suitable provision to monitor movement of waste to and from the premises.

The WCMR submitted via the WARRP system details the quantity, type and source of waste received by a site as well as the quantity, type and quality of waste transported from the site.

All sampling and waste classification data is to be retained for the life of the facility in accordance with EPA requirements.

Figure 5.3 below shows typical screenshots of the WARRP system being currently used to report waste material movements to and from the site.

Figure 5.3 – WARRP screenshots

WCMR: Facility ABC v1

Reporting Period Ending: September 2015 Due: 25 November 2015

No waste has been received, processed or removed from site during this period

Waste Received Metropolitan Levy Area

Municipal

| Received/Source | Waste Type | Quantity (tonnes) |
|---|------------|-------------------|
| <input type="button" value="Add New Source"/> | | |

Commercial and Industrial

| Received/Source | Waste Type | Quantity (tonnes) |
|---|------------|-------------------|
| <input type="button" value="Add New Source"/> | | |

Construction and Demolition

| Received/Source | Waste Type | Quantity (tonnes) |
|---|------------|-------------------|
| <input type="button" value="Add New Source"/> | | |

Unknown waste stream

| Received/Source | Waste Type | Quantity (tonnes) |
|---|------------|-------------------|
| <input type="button" value="Add New Source"/> | | |

WCMR: Facility XYZ v1

Reporting Period Ending: September 2015 Due: 25 November 2015

Deductions - Waste transported from site

i Please note the proximity principle offence commenced on 1 November 2014. This makes it an offence to transport waste generated in NSW beyond 150km from its point of generation, with limited exceptions.

Waste transported from site for disposal at a licenced waste facility

| Facility | Waste Type | Rate Paid | Quantity |
|---|------------|-----------|----------|
| <input type="button" value="Add another Facility"/> | | | |

Waste transported from site for lawful recovery at a licenced waste facility

| Facility | Waste Type | Rate Paid | Quantity |
|---|------------|-----------|----------|
| <input type="button" value="Add another Facility"/> | | | |

Waste transported from site under a Resource Recovery Order

| RRO | Waste Type | Rate Paid | Quantity |
|--|------------|-----------|----------|
| <input type="button" value="Add another RRO"/> | | | |

Waste transported from site for lawful recovery (not a licenced waste facility)

| Destination | Waste Type | Rate Paid | Quantity |
|--|------------|-----------|----------|
| <input type="button" value="Add another Destination"/> | | | |

WCMR: Facility ABCv1

Reporting Period Ending: August 2015Due: 14 September 2015

Summary details

Current position

| | Tonnes |
|--|---------------|
| Waste Received - MLA | 500.00 |
| Waste Received - RLA | 400.00 |
| Deductions - Waste transported from site | 300.00 |
| Net position for reporting period | 600.00 |

Authorised Amount

| | |
|---------------------------------|-------------------------|
| Authorised Amount | 9,999,999.00 |
| Opening Stock | 3,510.00 |
| Net change to stockpile tonnage | 600.00 |
| Closing Stock | 4,110.00 tonnes - 0.04% |

Certification statement

I John Doe certify that the information contained in the report in respect of scheduled waste facility Facility ABC (licence number: L838343) located at Kentucky Road for the reporting period August 2015 is true and correct.

I further certify that all deductions claimed in this report are valid and correct and that the occupier of the scheduled waste facility has kept the necessary records to substantiate these claims as required by clauses 26 to 33 of the Protection of the Environment Operations (Waste) Regulation 2014.

I understand that all information contained within this report, records maintained in support of this report, and any claims for exemptions and deductions may be subject to EPA audit inspection.

Please select the option that applies to you:

Click the E-Certify button to complete e-certification. You will receive a return email confirming that the report has been successfully submitted to the EPA. Please email waste.levydata@epa.nsw.gov.au if you do not receive this confirmation.

CancelSave< PreviousE-Certify

Tip Inspecting Safe Work Procedure (page 1 of 8)

| | | | |
|--|---|---|--|
| SWP 5.4 | | BENEDICT BENEDICT | |
| Tip Inspecting | | | |
| Purpose: | To provide a detailed and illustrated methodology for tip inspecting. | | |
| Applications: | Business Units | Benedict Recycling | |
| | Department | Operations | |
| | Plant | N/A | |
| Exemptions: | N/A | | |
| Documentation: <small>Including permits, notifications and forms</small> | Load Classification Form | | |
| Specific Competency Requirement: | <i>Position</i> | <i>Requirement</i> | |
| | Tip Inspector | Trained in this SWP | |
| | | Trained in Waste Identification | |
| | | Trained in Asbestos Awareness | |
| | | Trained in Site Traffic Management Plan | |
| | | Trained in Site Communication Protocols | |
| | | Trained in Site PPE requirements | |
| | | Trained in Overloaded Heavy Vehicle Procedure | |
| Completed Tip Inspector Competency | | | |
| Specialised Primary Equipment/ Plant/ Tooling | <i>Description</i> | <i>Note</i> | |
| | | | |
| | | | |
| | | | |
| | | | |
| Personal Protective Equipment required during the entire activity: | <div style="display: flex; justify-content: space-around; align-items: center;">     <div style="text-align: center;">  (When Required) </div> </div> | | |

Tip Inspecting Safe Work Procedure (page 2 of 8)

|  | | | | | |
|---|---|--|---|---|--|
| SWP 5.4 Tip Inspecting | | | | | |
| STEP | TASK | ACTIVITY | POTENTIAL HAZARDS | CONTROLS/ PRECAUTIONS | ILLUSTRATIONS |
| 1 | Customer to stop at designated stop point | Weighbridge to notify to tip inspector when large tip offs are entering the site Weighbridge to notify tip inspector of driver with no access to UHF radio Check truck/ vehicle condition Check drivers ticket for initial classification and verify Tip inspector to check for visible contaminants Indicate to driver where to tip load | Unfamiliar with site Collision Dust Slips, trips and falls Lack of communication Driver on mobile phone Contaminated load | Driver Induction. Traffic management signage. Stop point area is to be kept clean at all times. Appropriate PPE to be worn. Dust suppression system to be periodically used when required. Trucks to untarp before entering tipping area. Verbal and visual contact made with customer driver and directions to tipping area given. Stop vehicle until driver is off the phone. If load is deemed to be contaminated, report to supervisor/manager immediately. Collect ticket from driver. Do not allow any vehicle to enter the tipping area unless approved by a Benedict employee. |    |

Tip Inspecting Safe Work Procedure (page 3 of 8)

| | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|--|---|--|---|--|--|--|
|  | | | | | | | | | | | | | |
| Tip Inspecting | | | | | | | | | | | | | |
| <p>SWP 5.4</p> <p>2</p> | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; vertical-align: top;"> <p>Customer tip off</p> </td> <td style="width: 25%; vertical-align: top;"> <p>Vehicle driving through tip off area</p> <p>Vehicle tipping off</p> <p>Inspect for contaminants</p> <p>Inspect for flammables</p> <p>Spread load when required</p> </td> <td style="width: 25%; vertical-align: top;"> <p>Too many vehicles/plant in tip area</p> <p>Collision</p> <p>Lack of communication</p> <p>Falling/ Rolling objects</p> <p>Vehicle tip over</p> <p>Dust</p> <p>Smouldering material/ Fire</p> <p>Crushing</p> <p>Unstable Vehicle</p> <p>Overloaded Vehicle</p> <p>Contaminated material</p> </td> <td style="width: 25%; vertical-align: top;"> <p>Tip inspector must communicate to machine operators in tip off area that the incoming vehicle is entering the area.</p> <p>Tip Inspector is not to let a vehicle enter the tip off area until responses from the area machine operators have been received.</p> <p>Ensure traffic management speed limits are followed.</p> <p>Limit vehicles in tipping area</p> <p>Signal driver to be positioned in areas of poor visibility, if required.</p> <p>Wear appropriate PPE – Gloves, dust mask, Hi Vis, Steel capped shoes, hearing protection, eye protection, sun protection and hard hat when required</p> <p>Ensure drivers tipping off are wearing appropriate PPE for the tipping area when out of their vehicle.</p> <p>Ground should be level and clear of debris.</p> <p>Spray down material with hose if dust is generated, or activate dust suppression system if available.</p> <p>No smoking in tip off area</p> <p>Use the appropriate firefighting equipment to extinguish a fire. If unable to control fire, notify warden of emergency.</p> <p>Stand well clear of falling objects. DO NOT stand immediately next to/ behind the skip bin/ tipping body during the tipping process, in case of vehicle roll over and/ or flying objects rolling out at speed.</p> <p>Do not inspect load whilst driver is tipping. Wait for bin to be back in travel position or a safe distance away from load on ground.</p> </td> </tr> <tr> <td colspan="2">  </td> <td colspan="2">  </td> </tr> <tr> <td colspan="2">  </td> <td colspan="2"></td> </tr> </table> | <p>Customer tip off</p> | <p>Vehicle driving through tip off area</p> <p>Vehicle tipping off</p> <p>Inspect for contaminants</p> <p>Inspect for flammables</p> <p>Spread load when required</p> | <p>Too many vehicles/plant in tip area</p> <p>Collision</p> <p>Lack of communication</p> <p>Falling/ Rolling objects</p> <p>Vehicle tip over</p> <p>Dust</p> <p>Smouldering material/ Fire</p> <p>Crushing</p> <p>Unstable Vehicle</p> <p>Overloaded Vehicle</p> <p>Contaminated material</p> | <p>Tip inspector must communicate to machine operators in tip off area that the incoming vehicle is entering the area.</p> <p>Tip Inspector is not to let a vehicle enter the tip off area until responses from the area machine operators have been received.</p> <p>Ensure traffic management speed limits are followed.</p> <p>Limit vehicles in tipping area</p> <p>Signal driver to be positioned in areas of poor visibility, if required.</p> <p>Wear appropriate PPE – Gloves, dust mask, Hi Vis, Steel capped shoes, hearing protection, eye protection, sun protection and hard hat when required</p> <p>Ensure drivers tipping off are wearing appropriate PPE for the tipping area when out of their vehicle.</p> <p>Ground should be level and clear of debris.</p> <p>Spray down material with hose if dust is generated, or activate dust suppression system if available.</p> <p>No smoking in tip off area</p> <p>Use the appropriate firefighting equipment to extinguish a fire. If unable to control fire, notify warden of emergency.</p> <p>Stand well clear of falling objects. DO NOT stand immediately next to/ behind the skip bin/ tipping body during the tipping process, in case of vehicle roll over and/ or flying objects rolling out at speed.</p> <p>Do not inspect load whilst driver is tipping. Wait for bin to be back in travel position or a safe distance away from load on ground.</p> |  | |  | |  | | | |
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Tip Inspecting Safe Work Procedure (page 4 of 8)

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| SWP 5.4 Tip Inspecting | | | | | |
| 3 | Customer Hand Unload (where applicable) | Customer unloading vehicle/ trailer/ light truck Benedict employee assisting in unloading vehicle/ trailer/ light truck Benedict employee supervising customer unloading Inspect for contaminants | Too many vehicles/ plant in unload area Collision Lack of communication Falling/Rolling objects Flying objects Needles Sharp Objects Slips, Trips and Falls | For all skip bin trucks, ensure they have their stabilising legs down prior to tipping. Follow overloaded heavy vehicle procedure Do not allow drivers to tip on top of previously tipped loads, in case of potential reloading. For all Front lift trucks, waste is to be unloaded in a separate bay from all other waste streams. Material in this bay is to be lightly wet down on a regular basis after inspecting. Access to this area is to remain clear, as this material is removed off site on a First In, First Out basis. If contamination is present, report to supervisor/ manager immediately. |  |
| | | | | Tip Inspector is not to let a vehicle enter the tip off area until area is free and clear of mobile plant. Customer vehicles are to wait in stop area until tip inspector directs them to enter tip off area. Ensure traffic management speed limits are followed. Verbal and visual contact made with customer driver and directions to tipping area consulted. Stand well clear of falling objects. DO NOT stand immediately next to/ behind the tipping body during the tipping process, in case of objects becoming airborne or rolling out at speed. Dust suppression system to be utilised periodically and when dust levels are elevated. Waste bays and access roads to be regularly maintained to ensure area is free and clear of debris and dust. DO NOT stand on waste stockpiles. |  |

Tip Inspecting Safe Work Procedure (page 5 of 8)

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|---|---|
| <h1 style="margin: 0;">BENEDICT</h1> | |
| <h2 style="margin: 0;">Tip Inspecting</h2> | |
| <p>SWP 5.4</p> |   |
| <p>Lifting of Heavy/ Awkward objects Cuts/ Abrasions Dust inhalation Eye Irritation Noise Needles Contaminated material Driver Frustration Smouldering material/ Fire</p> | <p>Wear appropriate PPE – Dust mask, Hi Vis, Steel capped shoes, hearing protection, eye protection, sun protection and hard hat when required. Gloves to be worn whenever handling waste materials.</p> <p>Provide assistance where customer is attempting to unload a heavy/ awkward object. Where object is found to be too difficult/ heavy to unload, use available mechanical aids to assist.</p> <p>Customers are to wear enclosed footwear.</p> <p>Customer to wear hi visibility shirt/ vest.</p> <p>Where customer does not have appropriate PPE, where possible, provide assistance to customer to minimise exposure to potential hazards.</p> <p>No smoking in tip off area</p> <p>Use the appropriate firefighting equipment to extinguish a fire. If unable to control fire, notify warden of emergency.</p> <p>If contamination is present, report to supervisor/ manager immediately.</p> |
| <p>Assessing and Classifying load</p> | <p>All relevant staff to attend asbestos awareness training.</p> <p>Tip inspectors trained in material classifications and identification.</p> <p>Tip Inspector to keep hydrated during the course of the shift.</p> <p>Wear appropriate PPE – Dust mask, Hi Vis, Steel capped shoes, hearing protection, eye protection, sun protection and hard hat when required. Gloves to be worn whenever handling waste materials.</p> <p>Dust suppression system/ water cart to be used when necessary.</p> |
| <p>Tip Inspector to inspect load</p> |  |
| <p>4</p> | <p>Fitness for duties Sun exposure Dust inhalation Eye Irritation Falling/ rolling objects</p> |

Tip Inspecting Safe Work Procedure (page 6 of 8)

BENEDICT

SWP 5.4

Tip Inspecting

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| | | | <p>Flying objects</p> <p>Noise</p> <p>Cuts/ abrasions</p> <p>Sharp Objects</p> <p>Needles</p> <p>Slips, trips, falls</p> <p>Collision</p> <p>Contaminated material</p> <p>Driver Frustration</p> <p>Smouldering material/ Fire</p> | <p>Watch where you're walking – looking out for sharp objects.</p> <p>Do not attempt to remove, touch or handle syringes. Cease inspection in the vicinity of any evidence of hazardous medical waste. Report incident to supervisor immediately.</p> <p>Tip inspector in control of traffic management.</p> <p>Be aware of position of excavators and loaders.</p> <p>Maintain positive radio/ visual communication with drivers/ operators in the area.</p> <p>Wait for truck to completely stop and make reciprocated visual or radio contact with the vehicle driver prior to inspecting load on the vehicle.</p> <p>Do not climb on top of stockpiles.</p> <p>Extra attention is required when loads appear to be from an older building OR waste loads from a Front lift truck.</p> <p>If paints, oil, fuel, chemicals, food or putrescibles are detected or suspected, instruct material to be reloaded onto truck/vehicle. Use precautions to not allow uncontrolled release of liquids during the reloading process. Wet down area when complete.</p> <p>Photos taken of all non-recyclable/ contaminated loads sent to weighbridge for processing.</p> <p>Load to be classified on the spot – driver told – and paperwork given.</p> <p>If contamination is present, report to supervisor/ manager immediately.</p> <p>Any disagreements on classification of waste with customer, tip inspector to escalate to site supervisor/ manager.</p> |    |
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Tip Inspecting Safe Work Procedure (page 7 of 8)

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| Tip Inspecting | |
| SWP 5.4 | |
| 5 | |
| Finding Contaminated Material | |
| Bonded Asbestos Contaminated Material (ACM) found Report to supervisor/manager immediately | Dust Inhalation |
| Friable ACM found Report to supervisor/manager immediately | Dust Inhalation |
| No smoking in tip off area Use the appropriate firefighting equipment to extinguish a fire. If unable to control fire, notify warden of emergency. | Notify your supervisor/ manager immediately. If found immediately after tipping, instruct material to be reloaded onto truck. Use precautions to not allow dust to be generated during the reloading process. If found in stockpile, load is to be isolated, spread out and checked. Dust to be suppressed as outlined in asbestos awareness training. Asbestos handling material to be worn – e.g. P2 respirator and gloves if required. Asbestos material is to be double bagged in an approved asbestos bag and tied in a 'goose neck' position. Bags to be placed into an isolated area, to be sent away to a licenced waste facility. |
| Images showing asbestos material: a pile of brown material on a blue tarp, and white bags with red markings. | Image showing a waste tip-off area with yellow and black safety barriers and a 'DANGER' sign. |

Tip Inspecting Safe Work Procedure (page 8 of 8)

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| <p>SWP 5.4</p> <p>Tip Inspecting</p> | | | | | |
| 6 | Releasing customer from tipping area | | | | <p>If flammable waste material is found, it is to be removed from the waste pile immediately and segregated from all other stockpiles.</p> <p>Wet down stockpiles where flammable materials were found</p> <p>Periodically wet down segregated flammable materials until removed from site.</p> <p>No vehicle is to leave the tipping area unless the tip inspector has signed and returned the classification docket to the driver.</p> <p>UHF radio communication between tip inspector and Benedict ground staff to inform of customer movements in shared yard areas.</p> |
| | Finding flammable material Report to supervisor/manager immediately | Smouldering material/ Fire | | |   |

ATTACHMENT B

Load Classification and Customer Docket/Receipt

BENEDICT RECYCLING PTY LTD **BENEDICT**

LOAD CLASSIFICATION

DATE: 4 AUG TIME: 12:30 REGO: BV93JS

BELROSE BANKSHEADON CHIPPING NORTON

| BT | LOAD | BIN SIZE |
|-------------------------------------|------------------|----------|
| <input checked="" type="checkbox"/> | DEMOLITION | 1.5m |
| <input type="checkbox"/> | BRICK / CONCRETE | |
| <input type="checkbox"/> | CONCRETE - 500 | ROSEBAY |
| <input type="checkbox"/> | CONCRETE + 500 | |
| <input type="checkbox"/> | CLEAN FILL | |
| <input type="checkbox"/> | RUBBLE | |
| <input type="checkbox"/> | SAND (2.60) | 1 |
| <input type="checkbox"/> | SANDSTONE | |
| <input type="checkbox"/> | STEEL | |
| <input type="checkbox"/> | OTHER | |

NON CONFORMING WASTE CHARGE YES NO

STAFF SIGNATURE: [Signature]

PRINT NAME: [Signature]

139601

WEIGHBRIDGE DOCKET

BENEDICT RECYCLING
BANKSHEADON
ABN: 71123156507
38 MCPHERSON ST
BANKSHEADON

PH: 02 9316 6333

W-104922

04 Aug 2014 12:30 PM

TRUCK ID: 118
CUSTOMER CODE: LCCH90
BENEDICT RECYCLING PTY LTD

SOURCE: PO BOX 1272
POTTS POINT
ORDER NO: ROSEBAY
JOB NO:

| AMOUNT | ITEM | RATE |
|--------|--------|------|
| 0.00t | L_BENB | |

METRES: 1.5

GROSS: 2.60 t TARE: 2.00 t

NET: 0.00 t

Driver Signature: [Signature]

I hereby certify that the docket details are correct and I have not exceeded my gross vehicle mass weight.

I hereby certify that this load does not contain any contaminated, hazardous, liquid, putrescibles or asbestos materials.

I have read and understood the conditions of entry.

Part of our tipping fees contains the \$133.10 EPA waste tax for every tonne that is stockpiled on site.

SAMPLE ONLY

Prohibited Wastes

The following waste types as defined by the NSW Environment Protection Authority's *NSW Classification Guidelines Part 1: Classifying Waste (November 2014)*, will be excluded from the facility:

a) Hazardous Waste

- Containers, having previously contained a substance of Class 1, 3, 4, 5 or 8 within the meaning of the Transport of Dangerous Goods Code, or a substance to which Division 6.1 of the Transport of Dangerous Goods Code applies, from which residues have not been removed by washing² or vacuuming
- Coal tar or coal tar pitch waste (being the tarry residue from the heating, processing or burning of coal or coke) comprising of more than 1% (by weight) of coal tar or coal tar pitch waste
- Lead-acid or nickel-cadmium batteries (being waste generated or separately collected by activities carried out for business, commercial or community services purposes)
- Lead paint waste arising otherwise than from residential premises or educational or child care institutions
- Any mixture of the wastes referred to above

b) Special Waste

- Clinical and related
 - clinical waste
 - cytotoxic waste
 - Pharmaceutical, drug or medicine waste
 - Sharps waste (for cutting, piercing or penetrating the skin) – any waste from the use of sharps from human health care, medical research, veterinary care or skin penetration, injection of drugs, or other substances
- Asbestos Waste
- Waste Tyres

c) Liquid waste of any description

- Any waste (other than Special Waste) that:
 - Has an angle or response less than 5 degrees above horizontal
 - Becomes free flowing at or above 60 degrees Celsius or when it is transported
 - Is generally not capable of being picked up by a spade or shovel
 - Is classified as liquid waste under an EPA gazettal notice

d) General Solid Waste (Putrescible)

- Household waste that contains putrescible organics
- Waste from litter bins collected by or on behalf of local councils

- Manure and night soil
- Disposable nappies, incontinence pads or sanitary napkins
- Food waste
- Animal waste
- Grit or screenings from sewage treatment systems that have been dewatered so that the grit or screenings do not contain free liquids
- Any mixture of the wastes referred to above

