



Environmental Management Plan (EMP)



**7 Casey Street, East Arm,
Northern Territory**

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ABN:	62 614 465 682
Line of Business:	Total Waste Management
Facility:	Depot Encompasses: • Transfer Depot • Waste Storage
Address:	7 Casey Street, EAST ARM
Review Frequency:	3 yearly

Rev No.	Revision Details	Issued to	Prepared / Updated By	Reviewed By	Authorised By	Date Issued
1.						

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1 Purpose and Scope

1.1 Why is it Important?

VTG Waste & Recycling developed an Environmental Management Plan (EMP) to ensure its operations align with the environmental protection standards set by the Northern Territory Environment Protection Authority (NT EPA). The purpose of this EMP is to systematically identify, manage, and mitigate potential environmental risks associated with the handling and storage of hazardous waste. By complying with NT EPA requirements, VTG demonstrates its commitment to environmental stewardship, regulatory compliance, and continuous improvement in waste management practices. The EMP also supports transparency and accountability through regular reporting and performance reviews.

1.2 Who does it apply to?

At VTG Waste and Recycling, the EMP applies to all personnel involved in activities that may impact the environment, in line with NT EPA regulations. This includes site managers, environmental officers, project managers, and consultants responsible for waste handling, storage, and environmental compliance.

2 Company Profile

VTG Waste & Recycling was established in Darwin on August 26, 2016. The business specialises in waste management and recycling of a range of domestic, commercial, and industrial products, operating in strict compliance with current and emerging industry standards.

VTG Waste & Recycling is a specialist in waste management and recycling. Key services provided include:

- Waste removal and disposal. This includes solid waste, hazardous, waste oils, septic and other liquid waste;
- Recycling of most forms of non-biodegradable waste products;
- Destruction of classified paper-based material and magnetic and optical media;
- Industrial services, including high-risk work (e.g. confined space);
- Consultancy Services for all forms of waste management and recycling.

The company employs over 90 people and has invested heavily in new, specialised vehicles, plant and equipment to ensure consistency in service delivery. The company holds certifications for our integrated management system to ISO 9001:2015, ISO 45001:2018, and ISO 14001:2015. Please refer to the attached Certificate of Registration.

Waste management is an ever-changing field that requires continual improvement in waste management technology, reduction of the impact of waste on the workplace and the environment, and the provision of quality services while minimising customer costs. This is not possible without exceptional customer service and a team of valued, dedicated and trusted employees.

3 Roles & Responsibilities

Role	Responsibility
General Manager	• Ensure that the Environmental Management System (EMS) is effectively implemented; • Approve the Environmental Management Plan; • Appoint/nominate the Environmental Representative and/or Site nominee; • Report to senior management on the performance of the system and environmental breaches; • Allocate project resources to handle environmental issues; • Take action to resolve major non-conformances.
Operations Manager	• Report to the immediate manager on environmental issues, breaches etc.; • Ensure that site personnel are aware of their environmental obligations; • Take action to resolve non-conformances, and; • Ensure suppliers and contractors comply with requirements.
People, Safety and Training Manager	• Ensure that audits of the system are carried out and reported; • Ensure that the Emergency Response Plan (ERP) is effectively established, implemented and maintained at the site level; • Provide advice and support concerning the ERP; • Complete environmental site checklists; • Collaborate to review the EMP to ensure compliance with AS/NZSISO 14001. • Review and update the EMP and associated documentation; • Provide support to the team to enable them to meet their environmental commitments; • Ensure that site personnel receive appropriate environmental awareness training; • Ensure that environmental records and files are maintained; • Ensure that non-conformances are recorded and actioned; • Complete environmental site checklists; • Undertake annual environmental audits to establish licence compliance gaps, and • Undertake periodic site environmental inspections and monitoring regarding regulatory standards.
Technical Manager	• Provide support from a risk analysis on environmental hazards • Update plans, drawings and supporting documents for the EMP • Initial contact for the NT EPA • Take part in compliance checks and audits

All Site Personnel	• Comply with the relevant Acts, Regulations and Standards. • Comply with VTG's Environmental Policy and procedures. • Promptly report to management on any non-conformances and/or breaches of the system. • Promptly report to management on any spills or environmental incidents; • Undergo induction and training in environmental awareness as directed by management.
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4 Statutory and Policy Considerations

This section outlines the environmental planning and regulatory context for the Site's operation, as well as VTG's management system requirements. VTG is dedicated to fulfilling all legal obligations and other voluntary commitments it has made. Compliance with applicable regulations is ensured through:

- Identifying and accessing legal and other requirements that are directly applicable to the Contracts;
- Consulting and involving relevant agencies, where applicable;
- Internally communicating relevant information regarding legal and other requirements;
- Continually auditing, reviewing and upgrading company systems, management plans and supporting documentation; and
- Provide relevant training.

4.1 Legal and Other Requirements

4.1.1 Acts and Regulations

Applicable requirements summarised from the key environmental legislation relevant to the operation of this Site is provided in Table 1 below.

Table 1. Key Environmental Legislation

Legislation	Purpose	Application
Environment Protection Act 2019 (and associated regulations)	- Environment protection and pollution reduction by regulating discharges to air, water and land, as well as preserving community amenities such as impacts from traffic, noise or odour emissions. - Provide the framework for assessing environmental impacts and seeking planning approval of development proposals or activities by public authorities in NT. - Classifying offences and issue of notices, subject to the severity of the offence. - Establish conditions and requirements for environmental audits.	Adherence to regime under new legislative requirements in force from the 28 June 2020
Environmental Protection (Air) Policy (Qld Gov, 2019)	- Designed to achieve the objectives of the Environmental Protection Act 1994 in relation to the air environment. - The purpose of the EPP (Air) is achieved by identifying environmental values to be enhanced or protected, outlining indicators and air quality objectives for enhancing or protecting these values and providing a framework for making consistent, equitable and informed decisions about the air environment.	Determine parameters for any potential emissions.

Biosecurity Act 2015 (Federal)	• This Act is about managing diseases and pests that may cause harm to human, animal or plant health or the environment.	• Required management to biosecurity risks posed by diseases or pests that may be in or on goods or premises in Australian territory. Provides powers to be exercised to monitor, respond to and control those risks. • Provides for arrangements to be approved authorising and requiring biosecurity industry participants to carry out biosecurity activities to manage biosecurity risks associated with goods, premises or other things for the purposes of this Act. • Gives officers powers to ensure people are complying with this Act, to investigate non-compliance and to enforce this Act by means such as civil penalties, infringement notices, enforceable undertakings and injunctions.
Waste Management and Pollution Control Act 1998	• Environmental protection, and where practicable to restoration and enhancement of the quality of, the Territory environment by: ○ (i) preventing pollution; ○ (ii) reducing the likelihood of pollution occurring; ○ (iii) effectively responding to pollution; ○ (iv) avoiding and reducing the generation of waste; ○ (v) increasing the reuse and recycling of waste; and ○ (vi) effectively managing waste disposal;	• Specifies the Regulations or an: ○ Environment protection objective, ○ Environment protection approval, ○ Environment protection license, ○ best practice license, environmental audit program, compliance plan, performance agreement or pollution abatement notice. • All works undertaken are required to utilise the waste hierarchy to avoid, recover and reduce waste.

	(b) to encourage ecologically sustainable development; and (c) to facilitate the implementation of national environment protection measures made under the National Environment Protection Council (Northern Territory) Act 1994.	• The NT EPA may exempt from environment protection approval, by notice in writing, declare that subsection (1) or (2) of the act does not apply in relation to an activity specified in Part 1 of Schedule 2 conducted at specified premises if a development permit has been granted under section 53 of the Planning Act in relation to the activity. • An EPL for transport of any trackable waste is held by the proposed tenant however, if required (refer Section 2.1.2). • General duty to immediately notify pollution incidents where material harm is caused or threatened is a requirement. • Pollution incidents such as water leakages, chemical or fuel leakages, or any other contamination that occurs whilst undertaken works must be reported.
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Dangerous Goods Act 1998	An Act to provide for the safe storage, handling and transport of certain dangerous goods	• Safe handling of dangerous goods and containers that are used in connection with dangerous goods, including the precautions to be observed and the methods of handling to be employed; • the classification of dangerous goods and methods for determining classifications; • manufacturing, designing, installing, repairing or carrying out any work on containers, pipelines or any plant or things that are used or are intended for use in connection with dangerous goods, • the design, construction, manufacture, installation, cleanliness, ventilation, venting, marking, placarding, labelling and maintenance of places, premises, plant, vehicles, containers, pipelines and other things that are used or intended for use in the handling of dangerous goods; • the siting, design, construction, ventilation, venting, illumination, maintenance, fittings, fixtures and management of premises, plant, buildings and structures that are used, or are intended for use, in connection with dangerous goods and the treatment of premises, plant, buildings and structures no longer required for the handling of dangerous goods; • the provision, maintenance, testing and use of safety and first aid facilities at a place, on premises or in or on a vehicle used for any purpose in connection with dangerous goods; • the making, keeping, production and inspection of records relating to dangerous goods and the providing of returns and other information relating to dangerous goods;
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Odour Impact Assessment from Developments Guidelines (DES, 2013)	Provides guidance for the assessment of potential odour impacts from new or upgraded developments on local air quality.	An odour impact assessment for a new facility or an upgrade to an existing facility is required to predict the potential odour concentrations.
Power and Water Corporation Act 1987	Creates the PWC with the following functions: - manage, plan, develop, expand, enhance, improve and reinforce electricity networks and power systems; - acquire, store, treat, distribute, market and otherwise supply water for any purpose; - collect, store, treat, market and dispose of wastewater; - in relation to gas are to buy, sell, process, store or transport; gas or products derived from gas; or products associated with gas or the products derived from it.	Permits and contractors undertaking works on behalf of PWC to: enter and occupy land or a building to operate, repair, replace, maintain, remove, extend, expand, connect, disconnect, improve or do any other things that PWC considers are necessary or appropriate to any of its works to construct new works and for these purposes, to carry out any work on, below or above the surface of the land, including the powers of entry into private property.

4.2 Management System

VTG utilises an integrated management system (IMS), administered through Skytrust, a cloud-based compliance system. The IMS is a structured governing document outlining policies, standards, procedures, and templates that represent the critical functional areas of the organisation.

VTG is committed to achieving best practices in environmental management across all its activities. This commitment is demonstrated by:

- Ensuring all VTG personnel, including contractors, adhere to the IMS, this EMP, and applicable environmental laws, regulations, and client standards;
- Assessing potential environmental effects to minimise or prevent them throughout the site's operational phase;
- Ensuring that all VTG personnel, including contractors, understand their environmental obligations, receive appropriate training and induction, and take an active role in environmental management;
- Confirming that site activities do not impair the quality of the surrounding environment;
- Reducing waste generation and resource usage while promoting recycling initiatives; and
- Implementing correct management and disposal methods for any contaminated waste encountered during operations.

Skytrust also manages issues and incidents, featuring modules for recording audits and inspections. Together, these systems provide VTG employees with access to VTG policies and processes. Moreover, VTG offers systems and tools for contractor management, learning and development, and data management.

VTG consistently conducts audits, reviews, and updates company systems, management plans, and associated documentation to uphold business practices and best standards while ensuring compliance with applicable legislation. To facilitate this, VTG operates a program for independent third-party certification and accreditation to the following standards:

Certification	Approval No.
Quality Management System ISO 9001- 2015	ISO 9001 – 0058465
Environmental Management System ISO 14001-2015	ISO 14001 – 0058466
Occupational Health and Safety Management System ISO 45001:2018	ISO 45001 - 0058506

4.3 Policies

VTG has established several company-wide policies to ensure effective management of its operations. These policies have been approved by VTG's leadership team and are regularly reviewed. All employees at VTG are required to adhere to these policies. VTG's environmental policies aim to reduce emissions in land, air, and water and to promote the responsible use of natural resources. This commitment is outlined in VTG's environmental and sustainability policies (see below).

4.3.1 Environment Policy

VTG is committed to minimising the environmental impacts of its operations and continually improving its environmental performance within a framework of sustainable development by:

- Effectively managing our significant environmental impacts, which involves regularly monitoring progress and assessing our performance against set objectives and targets.
- A commitment to driving continual improvement and adhering to the ISO 14001 environmental management standard as part of our integrated business management system.
- Ensuring compliance with applicable environmental laws and contractual obligations relating to our operations while supporting our customers and suppliers in using products and services in an environmentally conscious manner.
- Effectively communicate our policies, objectives, and accomplishments to everyone working on behalf of the business, providing education and training to employees to enhance their understanding of environmental issues and the impact of their actions.
- Prevent pollution and protect natural, historical, and constructed environments while minimising the consumption of raw materials, energy, and other supplies.
- Actively consult with relevant stakeholders, considering local environmental contexts, and collaborate with communities to achieve shared and sustainable outcomes.

4.3.2 Sustainability Policy

For VTG, sustainable development involves implementing business strategies and activities that fulfil the current needs of VTG and its stakeholders, while safeguarding, supporting, and enhancing the human and natural resources required for the future. This commitment is articulated in VTG's Sustainability Policy:

- We prioritise ethical responsibility to create value in our activities while employing sound risk management principles in our business operations. As part of its 'non-negotiables,' VTG will adhere to all relevant legislation regarding pollution prevention and strive to enhance our integrated business management system, ensuring a consistent and disciplined approach to our processes. We will leverage appropriate resources, both internal and external, to achieve our objectives.
- We believe in partnering for innovation and aim to understand and support our customers in reaching their business goals.
- Our commitment to attracting and retaining a diverse and talented workforce will include providing development opportunities for continuous learning, effective communication, workplace consultation, and fostering an 'Always Safe' environment, with the goal of achieving a zero-incident policy regarding workplace injury or illness for our employees, visitors, and contractors.
- We are dedicated to designing and implementing sustainable solutions that ensure access to resources while also protecting and replenishing them. VTG is committed to demonstrating environmental leadership in its operations, managing our environmental impacts, and enhancing outcomes related to waste, water, energy, and carbon while safeguarding biodiversity and natural capital.
- We actively collaborate with local communities to achieve meaningful and long-lasting results. Furthermore, VTG will engage with government bodies, policymakers, advocacy groups, industry associations, and other stakeholders across our operational areas to deliver greater value and outcomes in sustainable practices.

5 Site Details

5.1 Location & Area of Site

The subject site is located at 7 Casey Street, East Arm, 0822 (herein referred to as "the site"). The site has an area of approximately 7,500 square meters. The existing shed has an area of approximately 1,600 square meters. The office space has an approximate area of 800 square metres. The remaining area of the site is completely sealed with no direct exposure to soil.

5.2 Description of Infrastructure

Services

The site is presently serviced by the following:

- Power and Water – connection in the footpath of Mendis Road;
- Sewer – Septic tank
- Electricity – front of site
- Telecom - connection in the footpath of Nebo Road
- Gas – Mendis Street

Infrastructure

The site has the following buildings and associated infrastructure:

- Dual site entrance/exit in Mendis Road and Casey Street;
- Concrete hardstand areas;
- Single story 800m³ office space;
- 1600 m² bunded shed (~160m³ of bunded area);
- 2 x 20ft bunded dangerous goods containers;
- On-site parking and dedicated landscaped areas;

5.3 Site Topography

The topography of the VTG Waste and Recycling site is generally flat, with a slight decline toward the front of the entrance, with elevations ranging from approximately 11 to 10 metres above sea level. The site surface is completely sealed, and drainage patterns direct surface water flow toward the stormwater drains at the eastern boundary or the onsite stormwater collection points. There are no significant natural features, such as hills, gullies, or watercourses, within the operational area, which allows for efficient vehicle movement and waste handling. The topography has been considered in the site's layout and environmental management planning to minimise erosion and control runoff.



Figure 1 7 Casey Street, East Arm

5.4 Site geology, Hydrology and Hydrogeology

The VTG Waste and Recycling site is located within the Darwin region, which lies on the edge of the Pine Creek Geosyncline. The local geology is characterised by lateritic soils and sandy clays overlying weathered

and fractured sedimentary rocks, including siltstone and sandstone. These formations exhibit moderate permeability, which can influence the movement of contaminants through the subsurface. The site surface has been partially modified with compacted fill to support infrastructure and vehicle access. The shed, roads and parking areas have been sealed with concrete.

The site is situated in a tropical monsoonal climate, featuring distinct wet and dry seasons. Surface water drainage across the site is generally directed toward the southwest, following the natural topographic gradient. Although there are no permanent natural watercourses on-site, stormwater is effectively managed through a system of graded surfaces and engineered drains to prevent ponding and off-site discharge. The hydrological setting has been carefully considered in the site's design to minimise erosion, manage runoff, and reduce the risk of contaminant transport during heavy rainfall events.

Groundwater in the Darwin region typically exists in unconfined aquifers within weathered and fractured rock formations, with depths ranging from 5 to 15 metres below ground level, depending on seasonal variation. The aquifers in this area are classified as moderate-yield fractured rock aquifers, with groundwater flow generally trending northwest, consistent with regional gradients. Groundwater salinity is generally low to moderate, and the site is not located within a declared groundwater protection zone.

5.5 Location of Sensitive Receptors

The VTG Waste and Recycling site, located at 7 Casey Street, East Arm, NT, is situated in an industrial area remote from sensitive receptors. The closest environmental receptor is Hudson Creek, located approximately 700 metres away, with constructed roads separating VTG Waste and Recycling from the creek. The nearest residential areas are Berrimah, Winnellie, and Palmerston, with Berrimah the closest at approximately 3.5 kilometres. Surrounding VTG Waste & Recycling are several industrial facilities; however, the zone has been officially permitted for industrial use, thereby facilitating waste storage, transportation, and recycling activities. Considerations regarding air quality, noise, and traffic impacts have been taken into account to ensure that VTG Waste and Recycling's activities do not materially affect nearby receptors.

5.6 Location of Sensitive Receptors

The VTG Waste and Recycling site, located at 7 Casey Street, East Arm, NT, is situated in an industrial area remote from sensitive receptors. The closest environmental receptor is Hudson Creek, located approximately 700 metres away, with constructed roads separating VTG Waste and Recycling from the creek. The nearest residential areas are Berrimah, Winnellie, and Palmerston, with Berrimah the closest at approximately 3.5 kilometres. Surrounding VTG Waste & Recycling are several industrial facilities; however, the zone has been officially permitted for industrial use, thereby facilitating waste storage, transportation, and recycling activities. Considerations regarding air quality, noise, and traffic impacts have been considered to ensure that the activities of VTG Waste and Recycling do not materially affect these nearby receptors.

6 Description of Activities

6.1 General Operations

VTG Waste & Recycling Pty Ltd is licensed by the Northern Territory Environment Protection Authority (NT EPA) under Environment Protection Licence EPL367 to operate as a listed waste handler and manages a listed waste premises at 26 Nebo Road, East Arm. The licence permits VTG Waste to collect, transport, store, recycle, and dispose of a wide range of listed waste for commercial and residential customers. The company is currently authorised to handle numerous types of waste (see Appendix A). VTG Waste is also seeking to expand its operation to include 7 Casey Street, East Arm, demonstrating its commitment to providing comprehensive waste management services across the Northern Territory.

The site shed is fully contained within a robust bunded area, featuring a hard-stand surface spanning an impressive 1,600 square meters. Surrounding the shed, a protective bund with dimensions of 0.10 meters in height, width, and depth effectively encircles the perimeter, offering a substantial volumetric bund capacity of approximately 160 cubic meters. In addition, two 20-foot shipping containers designated for dangerous goods are strategically positioned to segregate highly corrosive and flammable materials from other waste streams, ensuring optimal safety measures. Each designated area is equipped with essential safety resources, including appropriate spill kits and fire extinguishers, readily available to respond swiftly to any spills or emergencies in adherence to the established emergency response plan.

The operations manager is responsible for undertaking regular monitoring of the environmental performance of the operation. The following aspects (which are cross-referenced to relevant elements) are to be checked daily and action taken to rectify any non-compliance.

6.1.1 Biosecurity Waste Operations Area

Biosecurity waste operations will be carried out in a designated area within the main shed. This area is fully bunded to contain any spills or loose waste.

Vehicles will load and unload bins in this area as well. Biosecurity bins will have specific storage locations marked with floor markings and clear signage. The management of biosecurity waste at the site adheres to the relevant approved arrangements issued by the Federal Department of Agriculture, Water and the Environment.

If not refrigerated, biosecurity waste can be stored for a maximum of two working days before treatment or refrigeration. If refrigerated, VTG will store biosecurity waste for a maximum of 90 days before disposal. Biosecurity waste must be disposed of within two business days of arrival at the current Depot.

6.1.2 Dangerous Goods Storage

For waste designated to be transferred offsite, there are dedicated dangerous goods (DG) storage containers on site, to store flammables separated to other waste streams. In addition, the shed will be bunded, providing approximately 1600 m² of storage space for other DG waste, ensuring there is sufficient space to segregate by DG class.

This storage area is designed to contain spills within the container and can be used as segregated storage for different classes of DG. Additionally, our vehicles are licensed to transport hazardous goods.

6.1.3 Heavy Vehicles Unloading and Parking

The truck parking areas will remain at 26 Nebo Road, East Arm, shown in the site layout, to satisfy the needs of VTG's current fleet while also accommodating potential future expansion. For the additional site (7 Casey Street), all existing car parks and driveway areas feature sealed surfaces that slope towards collection points. There are designated entry and exit points for both light and heavy rigid vehicles. The car parking areas facilitate two-way traffic and provide functional access to each parking space. Every car parking space measures at least 2.5m wide by 5.5m long and is easily visible from the driveways. Loading areas are located directly in front of 6 m x 6 m roller doors, providing access to the warehouse beneath the existing awning. The external surface drainage and hardstand sealing will remain unchanged. The hardstand is fully sealed and connects to a series of side-entry and grated inlet pits, discharging into the transport infrastructure and the planning department's stormwater system along Mendis Road and Casey Street. There will be no alterations to the stormwater collection and discharge process as part of this work.

7 Waste Characteristics

7.1 Waste Types

Schedules of waste types, which are permitted and/or prohibited, are specified in Appendix A - Current Listed Wastes Authorised to be Handle.

7.2 Waste Transportation and Delivery to Site

Most waste transport vehicles use the Sitel feature and have a rigid, non-articulated frame, available in various capacities. Tankers are equipped with "vacuuming" or "pump loading" systems for transferring liquid waste from different tanks. Listed waste transportation is performed solely with company-registered vehicles. This guarantees that each vehicle designated to transport listed waste is recorded in the company's vehicle fleet manifest and, where applicable, complies with the NT Dangerous Goods (Road and Rail Transport) Act. All EPA-approved vehicles will be documented and updated on the EPA online portal.

7.2.1 Waste Collection

The key hazardous activity of Waste Collection relates to:

- Collection and removal of waste from customer sites and transport of waste inter-site or to landfill locations within the area of operation; and
- Replacement of waste collection bins and supporting activities directly required to complete these task(s).

7.2.2 Types of Equipment

Typical classes of plant and equipment used to undertake Waste Collection are, but not limited to Table 25.

Table 25: Classes of Equipment Used for Waste Collection

Equipment Type	Purpose
Front Lift	This waste removal system helps collect and dispose of waste from customer locations. It uses a front lift operation to gather general waste, plastics, and cardboard by moving forward and depositing the waste into the back of the Waste Collection truck. Explicitly designed for collecting compressible waste materials, the front lift vehicle efficiently retrieves waste from containers.
Side Lift	A waste removal system designed to help collect and dispose of waste from customer locations. The side-lift operation is employed to gather general household waste either manually or with the aid of a robotic arm and claw, which automatically lifts and tips the bins into the hopper.
Rear Lift	A waste removal system designed to facilitate the collection and disposal of waste from customer locations. The rear lift vehicle performs three primary functions: loading containers with hydraulics, compacting waste, and ejecting waste into a landfill facility.
Hook Lift	A waste removal system designed to aid in the collection and disposal of waste from customer locations. The hook lift operation manages designated bins for the delivery, collection, and transfer of waste to landfill sites.

Skip Lift	A waste removal system to assist with the collection and disposal of waste from customer sites. The skip lift operation services selected bins for delivery, collection and transfer of waste to landfill facilities.
Liquid Tanker	Helps in the mass collection and disposal of liquid waste from customer locations, including but not limited to pumping and transporting bulk liquid waste and sludge.

7.2.3 Activity Requirements

Waste Collection can be categorised in the following activities:

Table 26: Activities definitions

Activity	Definition
Quarantine Waste	Waste which includes: • Material used to pack or stabilise cargo; • Galley and food waste; • Human, animal or plant waste; • Refuse or sweepings from the holds or decks of a vessel or installation; • Any other waste or material, which comes into contact with Quarantine Waste; • Contents of airport amnesty bins; • Articles seized by AQIS and/or not collected by clients.
Controlled Waste	• A - Plating and Heat Treatment; • B - Acids; • C - Alkalis; • D - Inorganic Chemicals; • E - Reactive Chemicals; • F - Paints, Resins, Inks and Organic Sludges; • G - Organic Solvents; • H - Pesticides; • J - Oils; • K - Putrescible and Organic Wastes; • L - Industrial Wash Water; • M - Organic Chemicals; • N - Soils and Sludge; • O - Clinical and Pharmaceutical; and • P - Miscellaneous – research and development, photographic chemicals, used tyres.

Hazardous Waste	• Explosives; • Flammable Liquids/Solids; • Poisonous; • Toxic; • Ecotoxic; • Infectious Substances Flammable Liquids; • Resins/Glues; • Thinners/Solvents; • Tars; • Compressed Gas/Cylinders; and • Fuels.
General Waste	• General ○ Food Waste; ○ Wax Cardboard; ○ Plastic Wrap; ○ Strapping Ties; ○ Ink Cartridges; ○ Light Globes; and ○ Tissue Paper. • Paper /Cardboard ○ Office Paper; ○ Cardboard; ○ Envelopes; ○ Magazines; ○ Phone Books; ○ Folders; ○ Reports; and ○ Coloured Paper. • Commingled ○ Plastic Bottles and Containers; ○ Glass Bottles and Jars; ○ Aluminium Cans; and ○ Steel Cans. • Food/Organics ○ Fruit and Vegetable Waste; and ○ Bread and Baked Goods. • Secure Destruction ○ Confidential paper and cardboard; and ○ Confidential reports.

7.2.4 Acceptance of Waste Deliveries

Liquids and packaged waste delivered to the Site must be accompanied by a Waste Manifest Form (WFM) from the customer. This should include a Safety Data Sheet (SDS) or be sourced from the online electronic chemical management system (ChemAlert), covering all relevant substances to facilitate the correct use of personal protective equipment, as well as safe handling and storage.

8 Operations Impacts

The environmental impacts of VTG's operations at the Site have been identified and assessed, as detailed in the VTG Site Risk Assessment. This evaluation included potential impacts related to operational hours, personnel movements, and the plant and equipment used. Below is a summary of all environmental parameters considered in the VTG Site Risk Assessment, along with the predicted impacts from Site operations. Additionally, the assessment includes information on mitigation measures to ensure that traffic, noise disturbances, and air and water quality do not negatively affect the local community during normal Site operations.

8.1 Land

The VTG Site Risk Assessment identified three potential environmental risks to the site, all assessed as Low or Medium after control actions were implemented.

8.1.1 Discharge offsite (sediment laden waters) - downstream impacts

The risk is deemed Low after the following control actions are applied:

- existing site design - concrete sealed hardstand (internal), bitumen/concrete (external)
- weather forecast monitoring (for windy/wet conditions)

8.1.2 Soil washed on site - tracked offsite

The risk is deemed Medium after the following control actions are applied:

- Site design - hardstand (no tracking of materials offsite)
- Mesh/barb wire perimeter fencing
- Bunding
- Housekeeping
- Weather forecast monitoring (for windy/wet conditions)
- Stormwater drain with grate
- Recycling activities all processed inside undercover areas

8.1.3 Waste not contained within the bin or body of the vehicle resulting in discharge during transportation

The risk is deemed Medium after the following control actions are applied:

- Driver vehicle induction and training
- Waste awareness training
- Contained tank/space are used for general waste that open when tipping and unloading waste
- Front Lift, Rear Lift, Hook Lift Operating Procedure
- Provision of tarps, restrain units, ropes and other equipment required to cover load (Hook Lift) 3rd party maintenance provider

8.1.4 Flooding

The risk is deemed Low since the site is not located in a flood zone:

- Site designed for monsoon events
- Location on high side of the road

8.2 Air Quality

The VTG Site Risk Assessment conducted an evaluation of expected air quality effects during site operation. The assessment found that the emissions of identified air quality pollutants from operational processes are not expected to significantly or consistently impact any sensitive off-site locations or local amenities, provided that the suggested mitigation measures are properly applied.

8.2.1 Dust

The VTG Site Risk Assessment has identified 2 potential risks of environmental impact to the site. All 2 deemed Low after control actions applied.

8.2.2 Dust from fixation plant/ramp and chemical used

The risk is deemed Low after the following control actions are applied:

- Undercover operations within a predominantly enclosed area
- Biosecurity comes in sealed containers and remains sealed during the treatment process

8.2.3 Emptying bin

The risk is deemed Low after the following control actions are applied:

- Operators trained according to manufacturer's operating manual for safe operation of plant
- Appropriate PPE to be worn by operators (dust mask, safety goggles/shield)
- Incident / Hazard reporting (Skytrust)
- Bins are in a controlled environment

8.2.4 Odour

The VTG Site Risk Assessment has identified two potential risks of environmental impact to the site. Both risks are deemed Low after control actions are applied.

8.2.4.1 Biosecurity waste and Hazardous waste (filters/rags etc)

The risk is deemed Low after the following control actions are applied:

- Biosecurity waste regulated under approved arrangement
- Hazardous waste within shed
- All tanks are covered

8.2.4.1. Odour created by site operational activities

The risk is deemed Low after the following control actions are applied:

- Enclosed area
- Waste stored in transit fully contained in a closed-vented system
- Driver training packages developed, including the importance and use of pre-start checklists and vehicle maintenance
- Preventative maintenance scheduled to include frequent truck washing, to ensure all waste residues are cleaned regularly

- Vehicle pre-start checklists to be filled out daily to ensure all SHEQ issues associated with vehicle are recorded and remediated
- Work instructions stipulating requirement for waste to be emptied from truck prior to end of shift

8.2.5 Visual Emissions

The VTG Site Risk Assessment has identified 1 potential risk of environmental impact to the site. It was deemed Medium after control actions applied.

8.2.5.1 Trucks & Minor plant equipment

The risk is deemed Medium after the following control actions are applied:

- Trucks preventive maintenance
- Minor equipment preventive maintenance

8.3 Water

An assessment of the predicted water quality impacts during the operation of the site was undertaken in the VTG Site Risk Assessment. The risk assessment indicated that the identified water quality pollutant emissions from the operation processes are unlikely to have any significant or prolonged effect at any off-site sensitive receptors or local amenity, where identified mitigation measures would be effectively implemented.

8.3.1 Surface Water Run Off

The VTG Site Risk Assessment has identified one potential risk of environmental impact on the site. It is deemed Low after control actions are applied.

8.3.2 Liquid Waste Undertake

The risk is deemed Medium after the following control actions are applied:

- Liquid waste received only in the designated bunded area
- Identified stormwater drains
- Drain/discharge points protected
- Triple interceptor installed

8.3.3 Stormwater

The VTG Site Risk Assessment has identified one potential risk of environmental impact to the site. It is deemed Low after control actions are applied.

8.3.3.1 Discharge offsite (sediment laden waters) - downstream impacts

- Historical knowledge of the site
- Sweeper to keep access road clean to prevent tracking of muddy material to stormwater system or offsite
- Arrestor baskets in stormwater pits to trap gross pollutants. Final stormwater pit with grit screen/oily water separator. Pump out of the system periodically
- Spill kits located in close proximity to the work area (in the maintenance shed)

8.3.4 Groundwater

The VTG Site Risk Assessment has identified one potential risk of environmental impact on the site. It is deemed Low after control actions are applied.

8.3.5 Groundwater contamination

- Sealed site - no infiltration to underlying groundwater
- Internal - protected by roofing
- External - impervious surface
- Monitoring inclement weather
- Historical knowledge of site

8.3.6 Leachate

The VTG Site Risk Assessment has identified one potential risk of environmental impact to the site. It is deemed Low after control actions are applied:

8.3.7 Leachate generation

- No waste disposal on site

8.4 Noise

An assessment of the predicted noise impact during the operation of the site was undertaken in the VTG Site Risk Assessment. The risk assessment indicated that the identified Noise emissions from the operation processes are unlikely to have any significant or prolonged effect at any off-site sensitive receptors or local amenity, where identified mitigation measures would be effectively implemented.

8.4.1 Operation noise

The VTG Site Risk Assessment has identified one potential risk of environmental impact to the site. It is deemed Low after control actions are applied:

8.4.2 During working hours

- Maintenance and operation of machinery/equipment/vehicles to be undertaken and maintained during the regular working hours
- Most of the equipment and operation works are performed inside the warehouse
- 24-hour operations permitted in zoning (Industrial) and within background levels of surrounds
- Action away from sensitive receptors.
- In the unlikely event of a significant noise generating activity, work practices will be reviewed and adjusted accordingly

8.5 Waste

An evaluation of the expected waste impact during the site's operation was conducted in the VTG Site Risk Assessment. This assessment revealed that the identified waste pollutant emissions from operational processes are unlikely to cause any significant or long-lasting effects on off-site sensitive receptors or local amenities, provided that the recommended mitigation measures are effectively implemented.

8.6 Operation Waste

The VTG Site Risk Assessment has identified two potential risks of environmental impact to the site. All two were deemed Low or Medium after control actions were applied.

8.6.1 Office waste

- Recycling and reuse using a reputable (licenced) recycling facility

8.6.2 Exposure to hazardous / biosecurity waste

- Storage segregation as per ADG Code 7.9
- Operation following procedures for biosecurity waste regulated under approved arrangement
- Bunding
- Fully stocked spill kit
- Spill response training
- Operator trained according to manufacturer's operating procedures for equipment use,
- Manual handling course conducted as part of driver training
- Near miss / Hazard reporting (Skytrust)
- Operating Procedure

8.7 Biodiversity

The VTG Site Risk Assessment assessed the potential effects on biodiversity throughout the site's operation. Findings indicate that the recognised biodiversity effects from operational activities are improbable to negatively impact off-site sensitive receptors or local amenities, assuming that the proposed mitigation measures are effectively enacted.

8.7.1 Flora and/or fauna species

The VTG Site Risk Assessment has identified 1 potential risk of environmental impact on the site. It was deemed Low after control actions were applied.

8.7.2 Threatened flora or fauna species, endangered flora populations or endangered ecological communities

- No threatened flora or fauna species, endangered flora populations or endangered ecological communities were recorded in the area
- Site long established and in an industrial zoned area

8.7.3 Indigenous heritage

The VTG Site Risk Assessment has identified two potential risks of environmental impact to the site. All 2 deemed Low or Medium after control actions were applied.

8.7.3.1. Discovery of Aboriginal and Macassan archaeological places at the site

Aboriginal and Macassan archaeological sites are unlikely to be found in areas that have been reclaimed, previously cleared or disturbed, or built over. In these cases, no action is typically required. If a site of Aboriginal or Macassan significance, or one that may be significant, is discovered during work, all operations in the vicinity will stop immediately. The Environmental Representative for VTG East Arm Depot will be contacted promptly to determine the next steps. If suspected human skeletal remains are found, all work will

halt, and the NT Police and NT Coroner's office will be notified. Should the burial be confirmed as Aboriginal, a heritage professional and the NT Office of Environment and Heritage will be consulted to establish the appropriate course of action.

8.8 Weather

The VTG Site Risk Assessment evaluated the expected weather effects during site operations. It concluded that the recognised weather impacts from operational processes are unlikely to negatively affect any off-site sensitive areas or local amenities, assuming that the suggested mitigation measures are properly applied.

8.8.1 Wind

The VTG Site Risk Assessment has recognised one potential environmental impact risk to the site. It has been classified as Low after implementing control measures.

8.8.1.1. Cyclone, Potential for emissions off site

- Enclosed works
- Weather monitoring
- Business continuity plan to include severe weather conditions

8.8.2 Storms

The VTG Site Risk Assessment has identified one potential risk of environmental impact on the site. It was deemed Low after control actions applied.

8.8.2.1. Cyclone, Potential for emissions off site and stormwater contamination

- Enclosed works
- Weather monitoring
- Business continuity plan to include severe weather conditions

8.8.3 Bushfires

The VTG Site Risk Assessment has identified one potential risk of environmental impact to the site. It was deemed Low after control actions applied.

8.8.3.1. Potential for emissions off site, Potential for facilities damages

- Not located in a bushfire zone

8.9 Environmental Incidents

The VTG Site Risk Assessment conducted an evaluation of the anticipated Environmental Incident impacts during site operations. The assessment revealed that the identified environmental incident effects from the operational processes are unlikely to adversely affect any sensitive receptors off-site or local amenities, provided that the proposed mitigation measures are effectively implemented.

8.9.1 Spills

The VTG Site Risk Assessment has identified nine potential risks of environmental impact to the site. All nine deemed Low or Medium after control actions applied.

8.9.1.1. Hydraulic and chemical spill, concrete, painting

- Emergency preparedness training
- Documentation check Emergency Response Plan
- Inductions
- Reporting
- Emergency control devices
- Agree to get checked/ approved contractor
- ER drills
- Meeting and toolbox talks
- Report to regulators as required
- Use of portable bunding

8.9.1.1. Crack in compactor / bin body or Seal damage of compactor / bin door

- Driver vehicle induction and training
- Contained tank/space are used for general waste that open when tipping and unloading waste
- Front Lift , Rear Lift, Hook Lift Operating Procedure
- Provision of tarps, restrain units, ropes and other equipment required to cover load (Hook Lift)
- Spill Response Training
- Fully stocked Spill Kit on vehicle
- Bin Condition report
- Vehicle inspection
- Regular preventative maintenance on vehicle body and truck to ensure structural integrity

8.9.1.1. Potential release / spillage of waste while manoeuvring bins to position

- Education material provided to drivers and clients on safe handling of bins
- Spill Response Training
- Provision of lidded bins to contain waste while tipping manoeuvring and lifting
- Fully stocked spill kits provided in every vehicle
- Bins positioned to allow minimal manual handling/manoeuvring of bins
- Chemical Spill Response Procedure
- Spill Response Flowchart
- Regular preventative maintenance scheduled to repair any leakages or identify damages

8.9.1.1. Incorrect disposal

- EPA waste tracking document
- Fully stocked spill kit
- Spill response training

8.9.1.1. Overloaded bins (above waterline)

- Client Contracts to establish bin load requirements
- Education material provided to drivers and clients on safe handling of bins
- Spill Response Training
- Fully stocked spill kits provided in every vehicle

- Chemical Spill Response Procedure
- Spill Response Flowchart
- Optimise maintenance schedule for bins and trucks to minimise potential for waste build up / spillage

8.9.1.1. Fuel tank leakage

- Spill Response Training
- Regular preventative maintenance scheduled to repair any leakages or identify damages
- Fully stocked Spill Kits in every vehicle
- Pre-start checklists developed to identify and report any damages, leakages or issues with vehicle

8.9.1.1. Compacting hopper

- Spill Response Training
- Regular preventative maintenance scheduled to repair any leakages or identify damages
- Fully stocked Spill Kits in every vehicle
- Pre-start checklists developed to identify and report any damages, leakages or issues with vehicle

8.9.1.1. Loading / Unloading bins onto lifter (Hook Lift)

- Spill Response Training
- Regular preventative maintenance scheduled to repair any leakages or identify damages
- Fully stocked Spill Kits in every vehicle
- Pre-start checklists developed to identify and report any damages, leakages or issues with vehicle

1.1.1.1. Hydraulic fluid hose eruptions

- Operators perform pre start / post work vehicle check (DVR)
- Regular preventative maintenance scheduled to repair any leakages or identify damages
- Operators trained in spill response
- Fully stocked Spill kits located on vehicles

8.9.2 Fire

The VTG Site Risk Assessment has identified 1 potential risk of environmental impact to the site. It was deemed High after control actions applied.

8.9.2.1. Electrical / Gas tank installation / welding / hot work

- Emergency preparedness training + documentation check ERP
- Inductions
- Reporting
- Emergency control devices
- Agree to get checked/ approved contractor
- ER drills
- Meeting and tool boxes
- Report to regulators as required
- Portable bunding
- Work Permits specific for works carried out

- Hot Work Permit specifically

8.9.3 Regulatory noncompliance

The VTG Site Risk Assessment has identified one potential environmental impact risk at the site, rated as Medium following the application of control measures.

1.1.1.2. Licence breach / Regulatory action (notices/warnings/penalties)

- Legal and other requirements addressed
- Risk register
- EMP
- Work documentation
- Report to regulators as required
- Monitoring and sampling as required

8.9.4 Reputation, community relationships

The VTG Site Risk Assessment has identified one potential environmental impact risk to the site, which was rated as low following the implementation of control measures.

1.1.1.3. Negative social media/media attention

- Site location (industrial zoning) - less impact on sensitive receptors
- Existing site (not greenfield site)
- Existing operations have 24/7 permissions (transport etc)
- Signage installed at front of site (public notice/exhibition)

8.10 Other

The VTG Site Risk Assessment evaluated additional factors that might influence site operations. It found that the other recognised impacts from operational processes are unlikely to adversely affect off-site sensitive receptors or local amenities, provided that the identified mitigation measures are effectively implemented.

8.10.1 Visual Amenity

The VTG Site Risk Assessment has identified 1 potential risk of environmental impact to the site. It was deemed Low after control actions applied.

8.10.1.1 Windblown litter, material tracking offsite and stockpile waste

- Housekeeping inspections to ensure litter controlled and visual amenity not impacted
- Supply a bin for litter control
- Induction, training
- Most enclosed activities

8.10.2 Socio-economic

The VTG Site Risk Assessment has identified 1 potential risk of environmental impact to the site. It was deemed Low after control actions applied.

8.10.2.1 Noise and traffic impact to local residents / Action on Council

- No local residents, only commercial/industrial
- <95dBa (daytime activities) day time operations only (hours to be confirmed)
- 24-hour operations permitted in zoning and within background levels of surrounds Action (worker PPE - noise protection >84dBa for 8 hours)

9 Implementation of this EMP

All personnel associated with the operation of the Site must comply with the legal, contractual and environmental requirements presented by VTG and addressed in this EMP.

VTG is certified to AS/NZS ISO 14001:2004 for Environmental Management Systems (EMS), ensuring that environmental issues are identified and managed throughout the company's operations. The EMS is implemented based on the standard Plan, Do, Check, Act model as follows:

- Planning and environmental issues identification;
- Development of corporate and operational documents including corporate policies, project planning strategies, environmental performance indicators, management plans, procedures and guidelines and project specific documentation;
- Implementation of environmental management programs, with adequate resourcing and training;
- Setting of environmental objectives and targets;
- Measurement and evaluation against key performance indicators; and
- Conducting management review for continual improvement.

All relevant conditions of licences, permits, consents and approvals are to be adhered to during the operation of the Site. Copies of all licences, consents, permits and approvals will be held on Site.

This section describes the implementation requirement of this EMP.

9.1 Environmental Training

Upon commencement, all contractors shall be made aware of their environmental responsibilities and shall familiarise themselves with the requirements of this EMP.

All contractors will receive induction/training in the following areas:

- Environmental Policy;
- EMP and related documents;
- Significant site aspects, impacts and controls;
- Emergency procedure and response;
- Understanding the site legal obligations;
- Personnel performing tasks that can cause significant environmental impacts shall be competent on the basis of appropriate education, training and/or experience, and;
- All inductions and on-going training, if required, shall be recorded.

9.1.1 Specific Training

In addition to the above, specific training related to environmental requirements, may include awareness of the following:

- Legal obligations and facility or activity specific environmental approvals (EPA licences etc)
- Individual authorities and responsibilities;
- Contract specific significant aspects, impacts and controls;
- Contract specific environmental objectives and targets,;
- Consequences of departure from procedures and contract requirements;
- Contract specific emergency procedure and response procedures; and
- Contract specific reporting and notification processes.

9.1.2 Contractor Training

Contractors engaged in activities pertaining to the Contracts will undergo training prior to starting work. Competency expectations for Contractors are communicated during the prequalification and selection process to align with contract requirements. This includes a request of necessary experience, qualifications, competencies and training records. VTG's Contractor Prequalification outlines its expectations. Environmental awareness training is delivered as part of the Contracts expectations.

9.1.3 Visitor Inductions

All visitors to Sites where work under the Contracts is occurring must be accompanied by a VTG authorised worker who has been fully inducted as per requirements. In addition, visitors must undergo the following training:

- General Site induction;
- Familiarisation with any Site specific emergency requirements; and
- Familiarisation with Site features and hazard awareness, including issue reporting requirements.

9.2 Communication and Consultation

VTG is committed to meaningful stakeholder engagement and works in collaboration with relevant government agencies and the local community in the areas where the Site operates to receive feedback and/or resolve issues that result from the operational activities.

9.2.1 External Stakeholders

External stakeholders relevant to the Site operation include, but are not limited to:

- Power and Water Corporation;
- Local Council in which the Site operates;
- Regulatory authorities (such as NT-EPA, local councils etc.);
- Emergency services;
- Other asset owners/operators;
- Nearby residents and businesses; and
- Any sensitive receivers, including businesses, schools etc. if identified where the works are being undertaken.

VTG liaises with appropriate regulatory authorities via meetings and/or correspondence.

9.2.2 Community Engagement

VTG will endeavour to keep neighbouring businesses informed in a proactive and responsive manner. VTG's communications may include signage, written notification, or personal calls.

Early engagement helps VTG to make neighbours aware of the works being undertaken, as well as to provide an opportunity to address concerns, where feedback is received by the Site manager.

When feedback is received, the Site manager will notify the relevant stakeholders to properly address the feedback received.

9.2.3 Complaints Handling

A sign will be displayed at the Site to inform neighbouring businesses or the public who to contact for complaints. The contact person is the Site manager through the phone number: (08) 89478947. The Site manager will be available for receiving public feedback, including complaints. The following process is to be followed on receipt of complaints:

- All complaints received (either written or verbal) will be documented to record and the following information is required:
 - Date and time of the complaint;
 - Date and time of the occurrence of matters causing the complaint;
 - Nature and extent of the complaint;
 - Details of all related factors including location, dates, frequency, duration, Site conditions and effects of the complaint
 - Method by which the complaint was made;
 - Name and position of the person receiving the complaint;
 - Name and address of complainant (if known);
 - Action taken in response to the complaint;
 - Action taken to prevent a re-occurrence of the circumstances leading to the complaint; and
 - Action(s) taken to address the complaint including follow up contact with the complainant.
- Complaints pertaining to environmental issues are to be reported to VTG People, Safety & Training Manager immediately, and escalated as appropriate.
- The complaints are to be logged in Skytrust. Any substantial complaint will be addressed as a non-conformance with the Contracts.
- Records of all complaints will be kept for at least 3 (three) years after the complaint was made.
- All complaints will be acknowledged as soon as practicable following receipt.
- The VTG Project Manager, or their nominee, shall investigate and determine appropriate corrective/preventive actions to be taken to address complaints and avoid any recurrence or minimise the reported (and verified) adverse effects.
- Where no action is taken the reasons why are to be recorded.

9.3 Incident and Emergency Response

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

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

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

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

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

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

Potential threats to the environment or public health that may arise as a result of the construction works at the Site include:

- Fire;
- Spills;
- Structural damage;
- Power or other utility failure;
- Natural disaster;
- Air/water quality contamination;
- Traffic incidents;
- Medical emergencies

The ERP aims to minimise the risk to all personnel in an emergency and control any incident or emergency to minimise damage to the environment, plant, equipment, and property. The ERP outlines:

- Facility/contact description, site plans and maps;
- Information on potential pollutants;
- Information on hazardous materials, including safety data sheets and spill containment materials, type and location (ie. on Site or on a vehicle);
- Incident identification and notification process;
- Emergency contact details;
- Emergency response personnel roles, responsibilities and procedures;
- Procedures to follow to minimise/control environmental incidents; and
- Testing and training requirements.

A copy of the ERP is to be kept where construction works are being performed and made available at all times.

9.3.1 Emergency Response Management

The Emergency Response Plan identifies and responds to potential incidents and emergencies at the Site. It describes the general policy and approach that should be followed when dealing with an emergency or incident. It aims to:

- Address various types of emergencies, including fire, spills, medical emergency etc;
- Minimise the risk to all personnel in an emergency;
- Control any incident to minimise damage to plant, equipment, property and the environment.

Incidents and emergencies will be managed in accordance with the ERP. This includes external and internal notification, recording, reporting and response processes.

The **Table 27** below summarises the potential hazards/ incidents associated with the operation of the Site, based on the preliminary environmental risk assessment that was undertaken and outlined in the Site Risk Register.

Table 27: Site Potential Hazard/ Incident

	Potential Hazard / Incident
1	Fire – Electrical, Chemical etc.
2	Spills – Liquid (Bursting Hydraulic Oils etc.)
3	Environmental Pollution – Uncontrolled discharge from Site (contaminated water)

Fire or Explosion

In the event of a fire or explosion at the Site, the emergency response plan is outlined below and the contacts provided in Section 10.3.2 of this plan.

Spills

In the event of a liquid spill during construction of the Site, the emergency response, outlined in the Emergency Response Plan - NT Waste appended to this EMP and the contacts provided in Section 10.3.2 of this plan.

Environmental Pollution - Uncontrolled Stormwater Discharge

In the event of an uncontrolled stormwater discharge observed during the operation of the Site, the emergency response is outlined in the Emergency Response Plan - NT Waste appended to this EMP and the contacts provided in Section 10.3.2 of this plan or **Table 20** below.

9.3.1.1 Bunding of Chemicals

VTG's East Arm Depot operations are designed to ensure that appropriate bunding of chemicals, lubricants and other liquids which have the potential to cause material or serious environmental harm are stored and banded in accordance with the SA EPA 080/16 Bunding and spill management guidelines.

9.3.2 Emergency Contacts

A list of personnel to be contacted during any Site or environmental emergencies has been compiled and presented in **Table 28** below:

Table 28: Site Contacts

Name	Role	Mobile	Email
James Prakash	Managing Director	0447 969 847	James.prakash@vtgwaste.com.au
Trent Nolan	General Manager	0400 621 481	trent.nolan@vtgwaste.com.au
Jayden Day	People, Safety & Training Manager	0418 847 403	jayden.day@vtgwaste.com.au
Dion Meta	Technical Manager	0418 265 180	dion.meta@vtgwaste.com.au

9.3.3 Incident Notification

The Site will have a set of procedures to ensure that all incidents are effectively reported, recorded, investigated and acted upon wherever possible. Notifications will be in accordance with the ERP.

The ERP provides guidance on the identification, reporting, and escalation of incidents and emergencies that have affected, or have the potential to affect, the environment and/or the health and safety of a worker or a visitor at the Site.

Incidents will be logged in Skytrust, VTG's issues management system, and managed in the following sequence:

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

If further action is required, this is also logged in Skytrust and assigned to specific VTG personnel for action. Corrective action can then be implemented to minimise the risk of the incident recurring.

Notifiable Environmental Incident

A notifiable environmental incident is an incident arising from a regulated activity that has caused or has the potential to cause material or serious environmental harm. Any notifiable environmental incidents are to be reported immediately to Senior Management and the People, Safety & Training team.

Environmental Incidents

An environmental incident includes a leak, spill or escape of a substance or circumstances where this is likely to occur. Material harm includes onsite and offsite actual or potential harm to:

- The health or safety of humans;

- The environment; or
- Property damage resulting in significant costs to remediate

If the circumstances giving rise to environmental harm or potential environmental harm occurs, communication with the appropriate regulatory authority (NT-EPA) is to be via the Environmental Compliance Advisor and/or nominee, and provide the following information:

- the identity of the person giving notice;
- the time and date of the circumstance;
- the circumstance causing or threatening to cause environmental harm;
- the place where the circumstance occurred or is likely to occur;
- how the environmental harm occurred, is occurring or may occur; and
- action taken to prevent, reduce control, rectify, or clean up the pollution or resultant environmental harm caused or threatening to be caused by the circumstances

If instructed by the People, Safety & Training Manager and/or nominee, the following authorities must be notified immediately, as relevant (see **Table 29**):

- NT Fire and Rescue Service
- NT EPA;
- NT WorkSafe;
- Local Council (where the incident has occurred).

Table 29: Notification authorities

Contacts	Function	Contact Number
Police	Emergency	000
	Attendance	131 444
Fire	Emergency	000
	Bushfire	1300 362 361
	Hotline	
Ambulance	Emergency	000
NT EPA	Pollution Hotline	1800 064 567
NT WorkSafe	Notifiable Incidents	1800 019 115
City of Darwin	24 Hour service	08 8930 0300
State Emergency Services	Emergency	132 500
Power Emergencies and Faults	Emergency/Faults - 24 Hours	1800 245 090

The most likely form of potential or actual environmental incidents at the Site during operation are considered to be fire and/pollution of waterways. Internal and external emergency contacts details are listed

in the ERP, with guidance on what to report. The reporting required, in accordance with relevant regulations may include but is not limited to as described in the section below.

9.3.4 Incident Reporting

VTG Management must notify the Northern Territory Rates Act Area EPA, and any other relevant agencies or stakeholders of incidents causing or threatening material harm to the environment or human health as soon as practical after they become aware of the incident. Notification will initially be made via telephone. The contact telephone numbers are presented in **Table 29**.

A written report will be provided within 7 days of the incident occurring to the EPA.

VTG will provide a written report, at the request of any authorised EPA officer, in relation to an event that has caused, is causing or is likely to cause material harm to the environment.

9.3.5 Licence Non-Compliance Reporting

VTG must notify the NT EPA of any non-compliance with the EPA 322 approval by completing the Non-Compliance Notification via NT EPA Online (or by emailing waste@nt.gov.au), as soon as practicable after (and in any case within 24 hours after) first becoming aware of the non-compliance.

The following information must be included in the notification of non-compliance to the NT-EPA:

1. when the non-compliance was detected and by whom;
2. the date and time of the non-compliance;
3. the actual and potential causes and contributing factors to the non-compliance;
4. the risk of environmental harm arising from the non-compliance;
5. the action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance;
6. corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur;
7. if no action was taken, why no action was taken; and
8. a date when an incident investigation report will be submitted to the NT EPA.

10 Environmental Management

10.1 Performance Measures

The **Table 30** outlines the environmental objectives and targets that will be adopted for the Site. These targets will be reviewed and amended based on any environmental impact and risk assessments undertaken, as well as any specific approval conditions and/or any other requirements imposed from external sources. The assessment and reporting of the data related to incidents, regulatory breaches, fines or penalties will be regularly reviewed by VTG and, where reportable, notified to relevant authorities.

Table 30: Objectives and Targets

Environmental Parameter	Objectives	Target / Performance Measure
Soil and Water Quality	• Effective management of Site surface water and unsealed areas to minimise soil erosion and sediment • Effective handling and management of onsite chemicals storage • Effective identification and protection of stormwater drain/discharge points	• Zero externally reportable incidents relating to sediment or sewage release and water quality impacts • Zero externally reportable incidents relating to chemical, fuels and oil spills • Resolution of soil and water quality issues identified through visual inspections, as part of general site housekeeping
Noise	• Limit < 95dBa for day time activities from Tailor Made. • Day time operations only (hours to be confirmed) except 5 am start for concreting. • 24 hour operations permitted in zoning and within background levels of surrounds (limit < 84dBa for 8 hours). • Implement a complaint line to respond to noise complaints	• No works outside standard hours unless for concreting. • All noise related complaints to be responded to by prescribed timeframe.
Air Quality	• No ongoing dust issues created as a result of project activities • Implement a complaint line to respond to dust or odour complaints.	• Areas of dust or odour issues observed during environmental monitoring during construction and post-construction • Number of complaints relating to dust or odour closed out within the prescribed time frame
Traffic and Access	• Avoid traffic disruptions • Avoid impacts on private property access	• No traffic complaints associated with the project

Waste Generation, Resource Use and Energy Use	• Maximum recycling of project wastes • Minimise waste generation	• Evidence of recycling of materials where possible • Reuse of existing plants and equipment
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10.2 Inspection, Testing, Maintenance and Monitoring

10.2.1 Monitoring

An annual monitoring programme is in place at VTG's facility at Nebo Road including inspections, assessments and reporting. These requirements will be reviewed and adopted as per risk register and in consultation with NT EPA for the operational phase of the Site, subject to its EPL conditions.

10.2.2 Inspections

Regular inspections will be undertaken at the Site, as per the **Table 31** below, to ensure that nominated environmental controls identified in the EIAR have been implemented, meet specifications, and are being maintained following the Site's inspection and testing schedule:

Table 31: Inspections

Item	Type of Inspection/ Testing	Frequency of Inspection	Responsibility
Prestarts/Take 5's	Hazard Identification	Daily	Workers
Always Safe Interactions	Visible leadership and task observation	Weekly Monthly	Supervisors Managers
Environmental Site Checklist	Inspection	Monthly or With changed environmental conditions (such as after significant rainfall events)	Supervisor/ Project Manager
Environmental & Safety Inspection and Audits	Verification	Annual, or as required	Contractors or VTG People and Safety team
VTG Asset Management System (VAMS)	Preventative maintenance inspections and checks	As required	Engineering

10.2.3 Records

The following records will be kept in accordance with appropriate regulatory, contractual and business retention periods to demonstrate environmental due diligence and compliance with the Site's Environmental Management Plan (EMP):

- Environmental permits such as licences as relevant;
- Completed inductions and training;
- Completed environmental checklists, categorisations and assessments;
- Environmental audit reports and audit findings;
- Non-conformances identified;
- Completed corrective actions;
- Complaints received;
- Environmental incidents and rectification actions taken;
- Waste tipping dockets;
- Plant and equipment registers and daily checks;
- Safety Data Sheets and chemical registers;

10.2.4 Reporting

At completion of each inspection, records are to be maintained and any findings logged in VTG's compliance management system, Skytrust. This system enables non-conformances and opportunities for improvement, identified through internal and external audit processes or inspections to be recorded, reported and responded, with corrective actions assigned to the responsible person(s).

Performance and compliance reporting will be undertaken as required, to produce systematic, comprehensive and informative reports on the environmental performance of the Site.

10.2.5 Auditing

Environmental audits will be undertaken as per VTG's governance program to verify that the Site meets its compliance objectives during the normal operation, as well as to support continuous improvement. The audits will assess the environmental performance of the Site based on:

- compliance with VTG policies, relevant legislative requirements and industry standards;
- whether the measures and/corrective actions carried out conform to the objectives of the EMP and as identified in the Site Risk Register
- the adequacy of implemented controls to minimise high risk environmental issues; and
- areas for continuous improvement.
- Audit findings will be reported to VTG management and logged in Skytrust.

10.2.6 Non-Conformances, Corrective and Preventative Actions

Environmental non-conformances shall be recorded in Skytrust, by the People, Safety & Training team.

Allocated corrective actions and preventive actions shall be generated and completed in accordance with VTG requirements, including required reporting timeframes as summarised on **Table 32** below.

Table 32: Non Conformances, Corrective and Preventative Actions

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

Environmental incidents and/or source of non-compliances will be investigated as per VTG's Incident Management Procedure or on a case-by-case basis, depending on the severity of the incident as per VTG's Risk Management Procedure. The **Table 33** below summarises the investigation level.

Table 33: Investigation Levels

Incident Classification	Investigator
1. Insignificant 2. Minor 3. Moderate	A suitable competent person from the organisational unit or functional area where the incident occurred.
4. Major 5. Catastrophic (Crisis)	Appropriately independent qualified person appointed as Lead Investigator.

10.3 Management Review

Management review of this EMP will be undertaken to assess the continuing suitability, adequacy and effectiveness of the implemented environmental management measures.

The inputs to the management review process will include (but not be limited to):

- incidents management and investigation of non-conformance events, incidents, near misses and management of all complaints received;
- changes in Site conditions or scope of works; and
- implementation of all compliance and legislative changes as identified at a corporate level;

Reviews may also be carried out by consulting documents such as the contractor documentation (as required), work instructions, variation to scope of works, completed inspection check sheets, and inspection and test plans as appropriate.

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

- possible changes to the EMP, associated work instructions, practices, objectives and targets associated with the environmental management of the works under the Contracts;
- improvement of the effectiveness of the VTG management system and its processes; and
- resource needs.

In addition to the management review, periodic meetings will be conducted to review all Site specific key performance indicators pertaining to the environment and relevant business systems. This will include reviews, and if necessary, revision of the EMP following any major incident or series of complaints, or any modifications to the consent.

Changes to the EMP will be recorded and issued as per the document control at the start of this EMP. The review will adequately address all sections of the EMP and action them appropriately.

The following forums will form part of the management review process under the Contracts, conducted periodically by the Project Managers and supervisors, in conjunction with operators and/or the People and Safety team as required:

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

The following processes will be used for continual improvement:

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

10.4 Supporting Documentation

Document Name
VTG Site Layout
VTG Emergency Response Plan
VTG Conceptual Site Model
VTG Environmental Monitoring Plan
VTG Site Risk Assessment

10.5 Referenced Documents

Document Name
<i>Biosecurity Act 2015 (Federal)</i>
<i>Dangerous Goods Act 1998</i>
<i>Australian Dangerous Goods Code Edition 7.9</i>
<i>Environment Protection Act 2019 (and associated regulations)</i>
<i>Guide to Environment Protection Approvals and Licences Under the Waste Management and Pollution Control Act (the Approvals and Licence Guide) (NT EPA(a), January 2013)</i>
<i>NT EPA Online- User Guide Application for an Environment Protection Licence (the EPL Application Guide) (NT EPA(b), June 2015)</i>
<i>Waste Management and Pollution Control Act 1998</i>
<i>Planning Act 1999</i>

11 APPENDICES

11.1 Appendix A - Current Listed Wastes Authorised to be Handle

Listed Waste	Collection	Transport	Storage	Treatment	Recycling	Disposal
Cyanides (organic)	✓	✓	✓	✗	✗	✗
Acidic solutions or acids in solid form	✓	✓	✓	✗	✗	✗
Waste from the production, formulation and use of photographic chemicals and processing materials	✓	✓	✓	✗	✗	✗
Waste from the production, formulation and use of resins, latex, plasticisers, glues and adhesives	✓	✓	✓	✗	✗	✗
Animal effluent and residues	✓	✓	✓	✗	✗	✗
Waste from the production and preparation of pharmaceutical products	✓	✓	✓	✗	✗	✗
Antimony, antimony compounds	✓	✓	✓	✗	✗	✗
Arsenic, arsenic compounds	✓	✓	✓	✗	✗	✗
Asbestos	✓	✓	✓	✗	✗	✗
Barium compounds other than barium sulphate	✓	✓	✓	✗	✗	✗
Basic solutions or bases in solid form	✓	✓	✓	✗	✗	✗
Beryllium, beryllium compounds	✓	✓	✓	✗	✗	✗
Boron compounds	✓	✓	✓	✗	✗	✗
Cadmium, cadmium compounds	✓	✓	✓	✗	✗	✗
Ceramic-based fibres with physio-chemical characteristics similar to those of asbestos	✓	✓	✓	✗	✗	✗
Chlorates	✓	✓	✓	✗	✗	✗
Chromium compounds that are hexavalent or trivalent	✓	✓	✓	✗	✗	✗
Clinical and related wastes	✓	✓	✓	✗	✗	✗
Cobalt compounds	✓	✓	✓	✗	✗	✗
Containers that are contaminated with residues of a listed waste	✓	✓	✓	✗	✗	✗

Listed Waste	Collection	Transport	Storage	Treatment	Recycling	Disposal
Copper compounds	✓	✓	✓	✗	✗	✗
Cyanides (inorganic)	✓	✓	✓	✗	✗	✗
Encapsulated, chemically fixed, solidified or polymerised wastes	✓	✓	✓	✗	✗	✗
Ethers	✓	✓	✓	✗	✗	✗
Filter cake	✓	✓	✓	✗	✗	✗
Fire debris and fire washwaters	✓	✓	✓	✗	✗	✗
Fly ash	✓	✓	✓	✗	✗	✗
Grease trap waste	✓	✓	✓	✗	✗	✗
Halogenated organic solvents	✓	✓	✓	✗	✗	✗
Highly odorous organic chemicals (including mercaptans and acrylates)	✓	✓	✓	✗	✗	✗
Inorganic fluorine compounds excluding calcium fluoride	✓	✓	✓	✗	✗	✗
Inorganic sulfides	✓	✓	✓	✗	✗	✗
Isocyanate compounds	✓	✓	✓	✗	✗	✗
Lead, lead compounds	✓	✓	✓	✗	✗	✗
Mercury, mercury compounds	✓	✓	✓	✗	✗	✗
Metal carbonyls	✓	✓	✓	✗	✗	✗
Nickel compounds	✓	✓	✓	✗	✗	✗
Non-toxic salts	✓	✓	✓	✗	✗	✗
Organic phosphorus compounds	✓	✓	✓	✗	✗	✗
Organic solvents excluding halogenated solvents	✓	✓	✓	✗	✗	✗
Organohalogen compounds that are not otherwise specified in this Schedule	✓	✓	✓	✗	✗	✗
Perchlorates	✓	✓	✓	✗	✗	✗

Listed Waste	Collection	Transport	Storage	Treatment	Recycling	Disposal
Phenols, phenol compounds including chlorophenols	✓	✓	✓	✗	✗	✗
Phosphorus compounds other than mineral phosphates	✓	✓	✓	✗	✗	✗
Polychlorinated dibenzo-furan (any congener)	✓	✓	✓	✗	✗	✗
Polychlorinated dibenzo-p-dioxin (any congener)	✓	✓	✓	✗	✗	✗
Residue from industrial waste treatment or disposal operations	✓	✓	✓	✗	✗	✗
Selenium, selenium compounds	✓	✓	✓	✗	✗	✗
Sewage sludge and residues including nightsoil and septic tank sludge	✓	✓	✓	✗	✗	✗
Soils contaminated with a listed waste	✓	✓	✓	✗	✗	✗
Surface active agents (surfactants) that contain principally organic constituents and that may contain metals and inorganic materials	✓	✓	✓	✗	✗	✗
Tannery wastes (including leather dust, ash sludges and flours)	✓	✓	✓	✗	✗	✗
Tellurium, tellurium compounds	✓	✓	✓	✗	✗	✗
Thalium, thallium compounds	✓	✓	✓	✗	✗	✗
Triethylamine catalysts for setting foundry sands	✓	✓	✓	✗	✗	✗
Tyres	✓	✓	✓	✗	✗	✗
Vanadium compounds	✓	✓	✓	✗	✗	✗
Waste chemical substances arising from R&D or teaching activities where the effects on human health and/or the environment are not known	✓	✓	✓	✗	✗	✗
Wastes containing peroxides other than hydrogen peroxide	✓	✓	✓	✗	✗	✗
Waste containing cyanides from heat treatment and tempering operations	✓	✓	✓	✗	✗	✗
Waste from the manufacture, formulation and use of wood preserving chemicals	✓	✓	✓	✗	✗	✗
Waste from the production, formulation and use of biocides and phytopharmaceuticals	✓	✓	✓	✗	✗	✗
Waste from the production, formulation and use of inks, dyes, pigments, paints, lacquers and varnish	✓	✓	✓	✗	✗	✗

Listed Waste	Collection	Transport	Storage	Treatment	Recycling	Disposal
Waste from the production, formulation and use of organic solvents	✓	✓	✓	✗	✗	✗
Waste mixtures, or waste emulsions, of oil and water or hydrocarbon and water	✓	✓	✓	✗	✗	✗
Waste pharmaceuticals, waste drugs and waste medicines	✓	✓	✓	✗	✗	✗
Waste resulting from surface treatment of metals and plastics	✓	✓	✓	✗	✗	✗
Waste tarry residues arising from refining, distillation and any pyrolytic treatment	✓	✓	✓	✗	✗	✗
Waste substances and articles containing or contaminated with PCBs, PCNs, PCTs and/or PBBs	✓	✓	✓	✗	✗	✗
Waste of an explosive nature not subject to the Dangerous Goods Act	✓	✓	✓	✗	✗	✗
Wool scouring waste	✓	✓	✓	✗	✗	✗
Zinc compounds	✓	✓	✓	✗	✗	✗
Waste mineral oils unfit for their original intended use	✓	✓	✓	✗	✗	✗

✓ Activity authorised by this licence

✗ Activity not authorised by this licence