

# Environmental Management Plan

Cleanaway Operations Pty Ltd

Site Location:

6 Wilkinson Road, Alice Springs NT 0870

Registered Address:

4/441 St Kilda Road, Melbourne VIC 3004

## **Version Control – 2022 update and changes since 2019 submission**

Consistent with conditions 8 and 9 of Environmental Protection Licence 241, this document is supplied to the NT EPA to outline changes to our Environmental Management Plan (EMP), which was previously submitted in 2019.

The key cause for submitting an updated EMP is to capture the additional storage capacity of clinical waste by using refrigerated sea containers in addition to the cool room. The additional storage will help Cleanaway continually provide waste collection, storage and disposal services the public and private health sectors, who are currently generating much larger volumes of waste due to the COVID pandemic. These services prevent a build-up of uncontrolled waste being stored at sensitive sites, including hospitals, aged care centres and testing facilities. Amendments in this document include:

- Updated table on page 5, to confirm that refrigerated sea containers can be used in addition to the existing coolroom
- Updates Site Conceptual Model on page 7, to identify the location that the sea containers will be stored, and the walkway to access both the cool room and the sea containers when unloading clinical waste bins
- Change of wording in the “Air Quality” section on page 8, to replace the words “clinical wastes are stored in coolroom, then transported offsite for treatment and disposal” to “clinical wastes are stored in refrigerated conditions, and the transported offsite fore treatment and disposal”.
- Updates to the Environmental Risk Register on page 15, to identify the risks posed by the additional storage, and document what controls measures will be used to mitigate those risks to an acceptable level.
- Updating the contact details in our site emergency team on page 12, to reflect:
  - o Blake Duncombe has now replaced Jannette Ackerman as our fire warden and first aid officer
  - o Brenden Koh has replaced Justin Sodomka as the Senior Health & Safety Business Partner

## Executive Summary

Cleanaway Operations Pty Ltd manages and operates the Alice Springs Waste Depot. Operation of the depot and the waste transport fleet is approved under section 34 of the *Waste Management and Pollution Control Act 1999* (WMPC Act), and authorised by Environmental Protection Licence 241 (EPL 241). In 2014 an Environmental Management Plan (EMP) was commissioned to document the controls to manage environmental risk posed by operation of the site. This Environmental Management Plan (EMP) has been developed to provide an updated, simplified overview of the operational controls implemented to manage environmental risks and comply with EPL 241.

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## Site Overview

The Alice Springs waste depot is located on land parcel Lot 1568 and 1569 A000193. The site is rectangular in shape and occupies approximately 3600m<sup>2</sup> land area within the light industrial estate of Ciccone. The site and entry is situated to the northern aspect of Wilkinson Street, adjacent to the Buslink transport depot to the west; Indigenous Art Gallery and Bridgestone Tyre centre to the east, and Aboriginal council centre to the south of the site. The topography of the local area and site is relatively flat with the site at an elevation of 580m. The ephemeral Charles River (situated to north) and Todd River (to the east) are situated approximately 1km from the site.

The primary licenced activities including the collection, transport and storage of liquid (bulk and packaged) and solid wastes, which are then diverted to resource recovery, treatment and/or disposal processes. A description of the waste handling and storage processes for major waste streams is provided in the Waste Transport, Receipt and Storage section.

## Operational Control and Supervision

The area is secured with 1.8m high mesh fencing, with a single controlled entrance from Wilkinson street. The site is secured outside of operational hours, to prevent unauthorised access.

The site-based Operations Manager oversees daily operations including fleet and plant, with support from the team leading hand, administrative staff and health, safety and environmental support services. Activities which have the potential to cause environmental impacts are outlined in the appended Environmental Risk Register, along with controls and risk ratings. The controls and performance monitoring criteria are described in the sections below.

Training requirements of all staff are assessed to ensure work can be complete safely, to control potential impacts to people and the surrounding environment. A training register is maintained by the operations manager, with support from a qualified trainer-assessor along with the broader health, safety and environment (HSE) team. Training includes company inductions, verifications of competency to operate equipment, and regular feedback at team meetings to review HSE concerns.

## Waste Transport, Receipt and Storage

Prior to accepting wastes or providing waste collection services to customers, all wastes are identified. If customers are not able to identify a waste type, Cleanaway complete a waste classification process, to ensure the waste can be safely handled, stored and transported to an appropriately licenced facility for further treatment, recovery or disposal. Once wastes are classified, the operations manager confirms whether the waste can be transported and/or stored under EPL 241, and provides advice to the sales team. All waste types which are not authorised to be stored by EPL 241 are transported to an appropriately licenced facility. In the event that Cleanaway identifies benefits for expanding the list of licenced wastes for collection, transport and storage, the operations manager will liaise directly with NT EPA and complete the appropriate application, to allow NT EPA to review the environmental risk management strategy and provide formal response.

Prior to the collection of listed wastes, drivers are provided with a waste manifest and a runsheet, with clear instructions for collection and delivery to the appropriate unloading destination. Upon arrival at the collection site, drivers inspect the waste to ensure it reflects the details recorded on the runsheet, and inspect the waste receptacles to ensure they are appropriately labelled and fit for transport and storage.

Waste transport, unloading and storage instructions vary dependent on the waste type, as outlined in the table overleaf.

Waste Stream	Stored on Site?	Site Storage Location	Final Destination
Kerbside Collections – Recyclable	No	N/A	Segregated waste streams are sent offsite for reprocessing
Kerbside Collections – general waste	No	N/A	Alice Springs landfill
Commercial & Industrial Collection	No	N/A	
Septic, Grease Trap	No	N/A	Power & Water ponds
Clinical Waste	Yes	Refrigerated cool room or sea container	Product destruction. Typically wastes are transported under SA EPA consignment authorisation to Daniel’s Health in South Australia for consolidation and downstream destruction.
Oily Water	Yes	Waste storage bund	
Waste Oil	Yes	Waste Storage bund	Offsite for refining of waste oil, typically at Cleanaway Wingfield in South Australia (SA EPA licence 15195)
Hazardous Chemicals - Packaged	Yes	Waste Storage bund	Offsite for resource recovery / treatment / safe disposal, typically at Cleanaway in Wingfield South Australia (SA EPA licence 15195)
Vehicle Washbay Wastewater	Yes	Washbay bund	Washwaters are treated through the onsite vertical gravity separator (VGS), to separate hydrocarbons from water. Recovered hydrocarbons are transferred into containers within the waste storage bund, and send offsite as waste oil.  Treated water is discharged to sewer, under authorisation of a trade waste agreement with Power & Water

## Stormwater Management

The environmental objective of stormwater management is to protect the water quality of public stormwater.

The entrance and exit driveways to the site are elevated from the Wilkinson street stormwater drains, to prevent stormwater ingress onto site from the larger catchment. Within the site footprint, stormwater is directed from the roadways and roofed areas to a grated drain just inside the site entrance. This catchment is kept free of stored wastes and litter, to remove potential hazards to the stormwater system. The main use of this area is for storage of empty bins, and parking of vehicles overnight.

Isolated from the stormwater system are the cool room, workshop, waste storage bund and vehicle washbay. The workshop and coolroom are roofed, to prevent wastes coming in contact with stormwater. Small volumes of chemicals used in the workshop are stored on portable bunds, to provide secondary containment. All washwaters in the vehicle washbay, including any stormwater ingress, report to the interceptor and vertical gravity separator for treatment. Recovered hydrocarbons are drained into waste storage containers within the waste storage bund, for transport offsite for treatment and re-use. Treated effluent is discharge to sewer, under trade waste agreement with utility provider Power and Water. Similarly, stormwater which falls within the waste storage bund is assessed for contamination. If the water appears clean or has signs of hydrocarbon contamination, it is collected and discharged to the washbay interceptor for treatment, with the treated effluent discharge to sewer. Any spills within the bund are recovered and stored in fit for purpose containers, typically IBCs or 205L drums, for transport to an EPA-licenced treatment facility.

To ensure the stormwater protection measures are effective, the site team complete routine inspections. Vehicles are subject to routine preventative maintenance, to ensure they remain safe and fit for purpose. Daily pre-start inspections are also complete by operators, and any drips or leaks are noted as faults requiring repair. In addition, workplace inspections are complete across the site on a monthly frequency. During the inspection, the bunded areas are inspected to ensure there is no spills or failure of either the primary or secondary containment. In the event there is a spill identified, the contents are recovered and cleaned. The stormwater catchment is also inspected, to validate that the area is free of any hazards to stormwater.

Finally, stormwater samples are collected annually during rainfall events. Cleanaway works with local environmental consultants to schedule sampling events which coincide with forecast rainfalls, however due to the sporadic pattern of rainfall in Alice Springs, it is not always practicable to collect stormwater samples.

Cleanaway will review the results of workplace inspections and laboratory analysis from stormwater samples, and take action as appropriate. In the event of a potential contamination event, NT EPA will be notified as soon as reasonably practicable.

### Site Conceptual Model



## **Air Quality Management**

The environmental objective for air quality management is to minimise the disturbance to ambient air quality for the local community.

Air quality on site can be impacted by a variety of operational processes. Potential impacts include noise, dust and odour from both fugitive and point sources. A variety of controls are in place to keep risks to a reasonable level, including:

- the site is sealed, reducing dust lift-off from vehicle traffic
- vehicles are well maintained, including exhaust systems
- highly odorous wastes are not stored on site,
- clinical wastes are stored in refrigerated conditions, then transported offsite for treatment and disposal

Cleanaway also maintains a register of complaints. Any complaint received is entered into the Vault database as an incident for investigation. Recent records show nil complaints related to air quality or environmental nuisance.

## **Litter Control**

The environmental objectives of litter management are to use all reasonable and practicable measures to minimise the amount of windblown litter.

Limited solid wastes are stored on site, and hence the risk of litter is inherently low. Cleanaway uses a variety of controls to manage litter, including

- Appropriate bins are provided to staff for wastes generated on site
- The site is fully fenced, to capture windblown litter
- Mesh grates cover the stormwater drain, to control stormwater ingress

Monthly workplace inspections including an assessment of litter, and observations of litter result litter collection campaigns to keep the yard tidy.

## **Reporting**

As mentioned in earlier sections, Cleanaway will notify the NT EPA as soon as reasonably practicable, where monitoring results or other information indicate there is potential for material harm to the environment.

Consistent with past practice, Cleanaway will provide an annual report to the NT EPA, addressing the status of compliance with each individual licence condition. Where the status indicates potential or actual non-compliance, Cleanaway will provide a detailed description of the situation, including any environmental impacts, and a list of actions taken to resolve the non-compliance. Cleanaway will also provide the Listed Waste Handler Report, to assist with the NT EPA annual return process. Both these reports will be submitted online using the NT EPA electronic licencing platform.

Cleanaway will store monitoring reports for a 5 year period, and will provide these to the NT EPA upon request.

## Community Consultation

The objective of community consultation is to maintain professional relationships with nearby community members and provide a process to address any concerns raised.

Cleanaway carefully manages potential impacts from the risk of nuisance during operations, as outlined in the sections above. In the event that Cleanaway receive an environmental complaint, the complaint is entered into the complaints register, for investigation and resolution. Details captured include the time, date, nature of the complaint, potential causes and remediation strategies, consistent with requirements of EPL 241.

Cleanaway's planning processes also take into account both customers and the broader community when managing the impacts of interruptions to routine business. In the event of interruptions to business, Cleanaway implement the following business continuity and response actions, to minimise interruption to customers and the local community.

Scenario 1: Inability to collect wastes due to interruption to truck or driver availability

Contingency Actions:

1. Contact external maintenance provider to repair vehicles (if appropriate)
2. Review available collection fleet and work schedule, and prioritise collections to minimise interruption to customers
3. Contact impacted customers and advise of changes to the schedule

Scenario 2: Inability to store wastes on site

Contingency Actions:

1. Identify cause for inability to store wastes, and implement a corrective action to mitigate the issue
  - a. Example 1: if the cause is a mechanical or electrical failure, work with the utility provider and contracted services to prioritise repairs
  - b. Example 2: if the cause is no available bundled storage capacity, prioritise transport of stored waste offsite to an EPA-approved treatment and/or disposal facility.
2. Review alternative local waste storage facilities and confirm availability
3. If the scenario has potential to cause nuisance to the neighbouring community, notify the neighbours and provide a summary of actions to fix the issue.
4. If the scenario impacts Cleanaway's ability to collect the waste, following the steps in Scenario 1

Scenario 3: IT / Communications failure, preventing effective communications with operations personnel and customers

Contingency Actions:

1. Contact alternative Cleanaway business units (for example Port Adelaide and Darwin) to assist administrative assistance
2. Divert incoming calls and communications to the alternative business unit
3. Request the alternative business unit to Contact IT Service Desk and request support
4. Contact the local network provider (if required)
5. Initiate manual communication process with collection personnel, until issue is resolved.

Cleanaway also manages relationships with the local community when managing emergency scenarios, as outlined in the

Emergency Management section overleaf.

## Emergency Management

In the event of an emergency the following management responses are provided.

### Fire

First Responder:

- Alert and evacuate nearby personnel located in the vicinity of the affected area.
- Immediately notify Emergency Response Team personnel and emergency services (if required).
  - When contacting emergency services, state the following:
    - name
    - Company name
    - Type of incident
    - Address of incident and nearest cross street, state and suburb
    - Types of injuries (if any)
    - Any other relevant information
- Direct one person to Meet Emergency services at front of site and direct to Area
- Where safe shutdown plant
- Where safe isolate power source and ignition sources
- Stay in communication until told otherwise
- Attempt to contain, control and extinguish the fire (if safe and you are trained to do so)

Emergency Response Team:

- Chief fire warden will assess the situation and identify the need for evacuation.
- Chief Warden will proceed to the Muster point and assess the area for suitability (Wind direction, any other hazards). Taking Emergency muster list roster, First Aid Kit and portable radio.
- Wardens will raise the alarm and proceed with evacuation if necessary.
- Area Wardens will sweep allocated areas, directing personnel to the emergency muster point VIA the safest route.
- Site first aider will proceed directly to the muster point with first aid kit and await direction. The chief fire warden will re allocate First aider duties if required.
- Ensure the safety and well-being of personnel and attend to the injured.
- Secure the scene and assist external emergency services.
- Institute a roll-call of personnel, contractors and visitors.
- Notify any affected external parties, including the neighbouring properties & regulatory authorities if appropriate (see tables overleaf).

### Large Spill Event

First Responder:

- Assess the nature of the spilt material, and the volume.
  - If the spill can be safely responded to without potential for impacts to people or the environment, commence the spill response steps outlined below.
  - If the spill may pose risk of harm to people, move to a safe area and notify the Site Emergency Response team.

Spill Response Procedure: CCCR

- **CONTAIN** the spill at the source. It is best to isolate the source of the spill, to minimise the volume as much as safely practicable.
- **CONTROL** the spill. Use the spill kit packs or alternative spill control equipment to install a containment barrier, to prevent the spill from spreading. A key focus is to prevent the spill from running into public stormwater areas or into environmentally sensitive areas.
- **CLEAN UP** the spilt material. Ensure that the spilt material, and any contaminated spill response equipment, is recovered & appropriately contained for safe disposal at an EPA-licenced venue
- **REPORT** the spill. Ensure an incident reports is complete with the Branch Manager, and entered into the HSE database. As above, if the spill cannot be immediately contained, notify the Site Emergency Response Team.

Site Emergency Response team:

- Assess the risk and determine if assistance from emergency services is required. If emergency services are contacted, provide the following information:
  - name
  - Company name
  - Address of incident and nearest cross street, state and suburb
  - Nature of spilt material, and estimated volume
  - Any other relevant information
- Direct one person to Meet Emergency services at the site
- Follow instruction of emergency services as appropriate
- Notify any affected external parties, including the neighbouring properties & regulatory authorities if appropriate (see tables overleaf).
- Commence incident investigation

Natural Disaster

- If safe to do so shut down plant as per shutdown procedure and isolate any other power, gas, water sources.
- Contact Emergency Response Team.
- Contact Emergency Services if necessary;
- Report as per Internal Notification Matrix
- When contacting Emergency Services, state the following:
  - Your name
  - Company name
  - Type of incident
  - Address of incident and nearest cross street, state and suburb
  - Types of injuries, property damage or environmental harm sustained
  - Any other relevant information
- Stay in communication until told otherwise.
- Implement any other applicable emergency procedure.
- When the natural event occur outside hours, where safe to do so the Chief Warden or their representative should visit the site to isolate any power, gas and water sources and provide access to emergency services where required

## Site Emergency Response Team

Position	Name	Contact	
		Site	After Hours/Mobile
Regional Manager	Jason Gornall	Holtze, Darwin	0419 090 298
Branch Manager	Blake Duncombe	Alice Springs	0402 975 840
Emergency Controller / Chief Fire Warden	Blake Duncombe	Alice Springs	0402 975 840
First Aider	Blake Duncombe	Alice Springs	0402 975 840
Leading Hand	Ian Mundy	Alice Springs	0424 969 189
Senior Health & Safety Business Partner	Brenden Koh	Malaga, WA	0409 370 485
Senior Environmental Business Partner	Tom Robertson	Wingfield, SA	0481 911 410

## External Regulator Authorities

Function	Primary / Alternate	Name	After Hours/Mobile
Customer	Alice Springs Council	Greg Buxton	0419 825 467
	Alice Springs Landfill	Reinier Laan	0408 085 537
Environmental Regulatory Authority	NT EPA – Darwin Office	N/A	1800064567
WHS Regulatory Authority	ComCare	N/A	1300 366 979
State Emergency Service	NT Police, Fire and Emergency Services	N/A	131 444

## Neighbouring properties

Neighbouring Facility	Contact Person & Number	Mechanism for raising alarm	Circumstance for raising alarm
ATG (Australian Transquip Group) Downunder	Murray or Russell 08 8952 5688 0447 477 053	Phone	Fire / Explosion
Cold Zap Refrigeration	0488 112 146 A/H 0407 247 596	Phone	Fire / Explosion
Bush Fires NT	Josh Fischer 08 8952 3066 0400 761 255	Phone	Fire / Explosion

Appendix 1 Site Environmental Risk Register

Activity	Aspect	Potential Impact	Causes	Likelihood	Consequence	Pre Control Risk Score	Controls In Place	Review / Monitoring	Likelihood	Consequence	Post Control Risk Score
Waste Transport Activities (including leaving the depot)	Air Quality	Discharge of dust or particulate	Unsealed roads are disturbed during transport Wastes are exposed to wind in open containers Exhaust Fumes	almost certain	Moderate	High	The depot is sealed, to minimise dust lift off A 10km/h site speed limit is signposted and adhered to Vehicles are subject to a thorough preventative maintenance program, with reports generated through JDE & DAMS Any environmental complaints are logged in the HSE database & investigated	Risk register reviewed annually Complaints entered into HSE database Daily Pre-start inspection	almost certain	Minor	Low
	Water Quality	Contamination of offsite stormwater or infiltration to groundwater	Vehicle suffers mechanical fail and leaks hydraulic oil / hydrocarbons waste contents of vehicle is not adequately contained and is lost during transport	almost certain	Moderate	High	Vehicles are subject to a thorough preventative maintenance program, with reports generated through JDE & DAMS Vehicles are regularly washed at the washbay, with treated effluent discharge to sewer under a Trade Waste agreement Trucks are equipped with spill kits, and spill are clean immediately Workplace inspections complete to identify spills	Risk register reviewed annually Monthly Workplace Inspection Daily Pre-start inspection	almost certain	Minor	Low
	Noise and Odour	Vehicle movements and operation of vehicles interrupts sensitive neighbours Contents of collected waste creates an odour nuisance	Wastes are collected at an inappropriate time Collected wastes are not appropriately contained and handled, becoming exposed to the elements	possible	Moderate	High	Vehicles are subject to a thorough preventative maintenance program, with reports generated through JDE & DAMS When scheduling waste collection, customer preferences and instructions are considered to avoid unnecessary nuisance or business disruption (for example, collecting grease trap waste outside of hospitality peak hours) The nature and volume of wastes are reviewed before assigning appropriate waste collection vehicles.	Risk register reviewed annually Daily Pre-start inspection Complaints entered into HSE database	unlikely	Moderate	Medium

Activity	Aspect	Potential Impact	Causes	Likelihood	Consequence	Pre Control Risk Score	Controls In Place	Review / Monitoring	Likelihood	Consequence	Post Control Risk Score
Waste and Chemical Storage	Fire	Fire	Waste stockpiles are too large Inappropriate wastes stored together	possible	Moderate	High	Waste volumes on site are kept low, and only in designated storage facilities  Flammable liquid wastes are stored in a dedicated storage bund, segregated away from other fuel sources such as the bailed recyclables and medical wastes  Consignment authorisations are maintained to authorise transport of wastes to treatment and disposal facilities interstate, particularly SA.  Fire suppression systems are in place on site including fire hoses around waste storage area & extinguishers in workshop and admin building	Risk register reviewed annually  Monthly Workplace Inspection  All incidents investigated and entered into HSE database	unlikely	Moderate	Moderate
	Water Quality	stored wastes or chemicals are exposed to rainfall or stormwater ingress, increasing risk of contaminated water release offsite	Wastes are not appropriately identified in waste manifests  Procedures are not adhered to	likely	Moderate	High	All liquid wastes are stored within a dedicated bund, to provide secondary containment in the event of a spill  Small volumes of chemicals within the workshop are stored on portable bunds and separate to the stormwater system  Spills are containing using spill kits and the vacuum truck fleet (if required).  Vehicle washdown water and stormwater which has come into contact with any hydrocarbon waste is treated at the washbay, with effluent discharge to sewer under Trade Waste Agreement	Risk register reviewed annually  Monthly Workplace Inspection  All incidents investigated and entered into HSE database	possible	Minor	Low
	Litter Release	Litter egress to street and local waterways	Insufficient litter controls Inappropriate wastes are receipted on site Inadequate fire prevention and control systems	Possible	Moderate	High	Minimal volumes of solid waste are taken on site: - Municipal collections are transferred to the local landfill - Co-mingled wastes are processed & bailed within the workshop, protected from weather  The site is fully fenced to prevent litter escape		Unlikely	Minor	Low

Activity	Aspect	Potential Impact	Causes	Likelihood	Consequence	Pre Control Risk Score	Controls In Place	Review / Monitoring	Likelihood	Consequence	Post Control Risk Score
Clinical waste storage	Air Quality (Odour)	Odour nuisance created for local community	Exposure of waste to ambient air Heat exposure of organic material Prolonged storage of waste	Possible	Moderate	High	Waste is bagged, and stored in lined bins Bins are kept closed Bins are stored within either the coolroom or refrigerated containers, keeping waste cool and containing any odours Consignment authorisations are maintained to authorise transport of wastes to treatment and disposal facilities interstate, particularly SA.	During daily unloading of waste Monthly Workplace Inspection	Unlikely	Minor	Low
	Water Quality	Stored wastes are exposed to rainfall or stormwater ingress, increasing risk of contaminated water release offsite	Inappropriate storage allowing waste to interact with stormwater	Unlikely	Minor	Moderate	Waste is bagged, and stored in lined bins Bins are kept closed Consignment authorisations are maintained to authorise transport of wastes to treatment and disposal facilities interstate, particularly SA Spill kits are stored on site and in vehicles to respond to any spills		Unlikely	Minor	Low