

ENVIRONMENTAL MANAGEMENT PLAN

Dundee Waste Transfer Facility - Waste Collection and Transport

60 Namarada Drive, Dundee Beach NT

Proponent	Pristine Pools and Spas Pty Ltd
Contract	Q23-0278 - Dundee Grounds and Waste Facility Maintenance Services
EMP type	Operational Environmental Management Plan
Scope	Segregation, containment, collection and direct transport of nominated waste streams
Prepared for	Northern Territory Environment Protection Authority licence application
Reference guideline	NT EPA Guideline for the Preparation of an Environmental Management Plan, May 2015, Version 1.0

Document status: EPA application submission

This EMP is a working document and will be reviewed and amended when activities, licence conditions, environmental risks or operating arrangements change.

Document Control

Version	Date	Prepared by	Status
1.0	20 August 2026	Pristine Pools and Spas Pty Ltd	EPA application

Approval and Responsibilities

Role	Name / Position	EMP responsibility
Managing Director	Bjorn Farley	Overall accountability; regulator and Principal liaison; approve corrective actions and EMP revisions.
Operations Lead	Ricardo Cubillo	Day-to-day implementation, inspections, waste scheduling, transport readiness and incident escalation.
Administration	Cassie Plain	Maintain logs, disposal dockets, complaints, training records and reporting records.

Purpose of this EMP

This Environmental Management Plan (EMP) sets out the auditable controls that will be implemented for the segregation, containment, collection and direct transport of nominated waste streams from the Dundee Waste Transfer Facility to appropriately licensed or authorised receiving facilities in Darwin. It has been prepared with reference to the NT EPA Guideline for the Preparation of an Environmental Management Plan (May 2015, Version 1.0).

The NT EPA guideline states that EMPs should document how environmental risks are assessed and managed, how legal and approval requirements will be achieved, and how environmental performance will be monitored, reported, audited, reviewed and communicated. This EMP follows those elements.

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1. Project Overview

1.1 Proponent and project

Pristine Pools and Spas Pty Ltd provides grounds and waste facility maintenance services under Contract Q23-0278. The relevant premises for this EMP is the Dundee Waste Transfer Facility at 60 Namarada Drive, Dundee Beach, Northern Territory.

The selected activity covered by this EMP is the collection and transport of nominated waste streams from the Dundee Waste Transfer Facility directly to appropriately licensed or authorised receiving, recycling, treatment or disposal facilities in Darwin. Waste will not be taken to 110 Levuka Road for storage, consolidation, treatment or disposal.

1.2 Activities covered

- Waste generated or presented at the Dundee Waste Transfer Facility will be identified and segregated by waste type within the facility compound.
- Waste will be contained in suitable containers or designated storage areas appropriate to the characteristics of the waste stream.
- Waste quantities and container condition will be inspected during routine facility servicing.
- Removal will generally occur approximately monthly, or earlier when a relevant safe or regulatory quantity or volume threshold for transport is approached.
- Before transport, loads and containers will be inspected, secured and documented.
- Waste will be transported directly to a receiving facility authorised to accept the particular waste stream.
- Disposal dockets, weighbridge tickets, receipts or equivalent evidence of lawful receipt will be retained and copies will be provided to the Contract Manager.

1.3 Waste streams

The activity will apply only to waste streams authorised by the relevant environmental licence and accepted by the nominated receiving facility. Current operational planning includes waste oil, used batteries, tyres, scrap steel and other nominated waste streams arising at the Dundee Waste Transfer Facility. Any new or materially different waste stream will be assessed before collection or transport and will not be handled unless lawful and authorised.

1.4 Related activities at the premises

Other activities at the Dundee Waste Transfer Facility include routine litter control and clean-up, rubbish compaction, mowing and edging, firebreak slashing, weed control, pest monitoring, securing of bins and completion of service records. These activities are managed under the existing facility Standard Operating Procedure and the contractor risk management system.

1.5 Operating sequence

1. Segregate	2. Contain	3. Inspect / Accumulate	4. Direct Transport	5. Docket / Report
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Waste remains within the Dundee Waste Transfer Facility compound until transport. There is no intermediate waste-storage premises in the transport chain.

2. Scope and Boundaries

This is an operational EMP for the waste segregation, containment, collection and transport component of the Dundee Waste Transfer Facility maintenance activities. It applies from the point at which a nominated waste stream is identified and segregated within the facility compound until the receiving facility accepts the load and issues disposal documentation.

2.1 Included

- segregation and containment within the existing facility compound
- inspection and temporary holding pending scheduled collection
- loading and securing of waste for transport
- direct road transport to an authorised receiving facility in Darwin
- spill, incident and emergency response associated with the activity
- waste movement records and disposal dockets
- monitoring, auditing, reporting, training and communication relevant to the activity

2.2 Excluded

- waste treatment, processing, reprocessing or recycling by Pristine Pools and Spas Pty Ltd
- burial, burning or permanent disposal of waste at Dundee
- storage or consolidation of transported waste at 110 Levuka Road
- acceptance of waste at any other Pristine Pools and Spas premises
- activities outside the authority of the environmental licence or the acceptance criteria of the receiving facility

3. Legal and Other Obligations

The activity will be conducted in accordance with applicable Northern Territory legislation, the environmental licence and any conditions attached to that licence, contractual requirements and relevant safety and transport requirements. This EMP will be updated where a licence condition or legal requirement introduces a more specific obligation.

Instrument / requirement	Relevance	EMP commitment
Waste Management and Pollution Control Act 1998 (NT)	Waste generation, pollution prevention, approvals/licensing and environmental duty.	Activities will be conducted to prevent or minimise pollution and environmental harm and in accordance with the licence.
Environment Protection Act 2019 (NT)	Environmental impact assessment framework.	The current activity has not been subject to a PER or EIS. Any material change that may trigger referral requirements will be assessed before implementation.
Work Health and Safety (National Uniform Legislation) Act 2011 (NT)	Safe systems of work and handling.	Waste handling and transport tasks will be undertaken under company risk procedures, SOPs and applicable PPE requirements.

Instrument / requirement	Relevance	EMP commitment
Applicable dangerous goods / road transport requirements	May apply depending on waste classification, quantity and transport configuration.	The applicable transport limits, packaging, load restraint, placarding and documentation requirements will be checked before dispatch.
Contract Q23-0278 and Contract Manager directions	Operational and record-keeping obligations.	Copies of disposal dockets from the authorised receiving facility will be provided to the Contract Manager.

4. Environmental Management Framework

This EMP forms part of Pristine Pools and Spas Pty Ltd's operational control framework and is supported by the company Risk Management Procedure, Dundee Waste Transfer Facility SOP, Environmental Monitoring Plan, Emergency Response Plan and Consultation and Communication Plan.

4.1 Environmental commitments

- No waste will be intentionally discharged to land, surface water, groundwater or stormwater.
- Waste will be segregated and contained to prevent loss, leakage, incompatible mixing and windblown material.
- Waste will be removed before quantities create an unacceptable environmental or transport risk.
- Waste will be transported directly to an authorised receiving facility.
- Disposal evidence will be retained and provided to the Contract Manager.
- Environmental incidents and non-conformances will be contained, recorded, investigated and corrected.

4.2 Roles

The Managing Director is accountable for EMP implementation. The Operations Lead is responsible for day-to-day operational controls and inspections. Field personnel are responsible for following segregation, containment, loading, transport and emergency procedures. Administration is responsible for controlled records and disposal documentation.

5. Existing Environment

The Dundee Waste Transfer Facility is located at 60 Namarada Drive, Dundee Beach. The broader Dundee locality is low-density and predominantly rural/rural-residential, with native vegetation, larger allotments and community, tourism, recreational fishing and small-scale commercial activities. The facility serves the local community and visitors to the Dundee area.

Environmental receptors relevant to the proposed activity include soil within and adjacent to the facility, stormwater and surface drainage pathways, surrounding vegetation, fauna, neighbouring land users and road users along the transport route to Darwin. The most credible pathways for environmental impact are accidental release of liquid waste to soil or stormwater, windblown litter, loss of material during transport, and fire or smoke associated with stored materials.

The activity does not introduce a new waste premises. Waste remains within the existing Dundee Waste Transfer Facility compound until it is removed for direct transport to an authorised facility.

6. Conceptual Site Model

A simplified conceptual site model (CSM) has been prepared because the activity involves potential contaminants and transport pathways. The CSM identifies sources, pathways and receptors and informs the risk assessment and monitoring program.

Potential source	Release / pathway	Potential receptor	Primary controls
Waste oil / liquid waste	Container leak, spill during loading, rainfall contacting leaked material	Soil, stormwater, vegetation	Sealed containers; inspections; spill kit; prompt clean-up; no intentional discharge
Used batteries	Damaged casing or electrolyte leak	Soil, stormwater, personnel	Segregated upright storage; protected handling; inspect before transport
Tyres / combustible waste	Fire, smoke, uncontrolled accumulation	Air quality, neighbouring land, vegetation	Quantity control; separation; housekeeping; prompt removal; emergency response
Scrap metal / solid waste	Wind or handling loss; sharp debris	Ground surface, fauna, personnel	Designated containment; secure loading; housekeeping
Transported waste	Load shift, road incident, container failure	Roadside soil, drainage, public	Pre-dispatch inspection; suitable vehicle; load restraint; emergency response

7. Environmental Risk Assessment

Environmental risks have been assessed using a likelihood x consequence approach consistent with the company risk management framework and the risk-management principles referenced by the NT EPA guideline. The rating below is qualitative and proportionate to the scale of the activity. Residual risk assumes the controls in this EMP are implemented.

Hazard / event	Potential impact	Initial risk	Key controls	Residual risk	Owner	Uncertainty / review trigger
Waste oil leak or spill	Soil/stormwater contamination	High	Sealed containers; inspections; spill kit; controlled loading; no discharge	Low	Operations Lead	Review after any spill, damaged container or change in container type
Battery leakage	Localised contamination /	Medium	Segregated upright storage; inspect;	Low	Operations Lead	Review if damaged batteries become

Hazard / event	Potential impact	Initial risk	Key controls	Residual risk	Owner	Uncertainty / review trigger
	corrosive release		secure handling			frequent
Windblown litter / escaped solids	Litter, fauna interaction, amenity impact	Medium	Contained storage; routine clean-up; secure loads	Low	Field Crew	Review after complaint or recurring litter
Tyre / combustible material fire	Smoke, air pollution, fire spread	High	Limit accumulation; housekeeping; separation; emergency procedures	Low-Medium	Operations Lead	Review after fire, near miss or increased volumes
Transport spill / load loss	Roadside contamination, public safety impact	High	Pre-dispatch inspection; appropriate vehicle/container; load restraint; direct route; emergency response	Low	Driver / Operations Lead	Review after transport incident or regulatory change
Contaminated stormwater	Pollutant migration off-site	High	Prevent leaks; protect containers; inspect after rainfall where warranted; prompt containment	Low	Operations Lead	Review after visible sheen, staining or runoff concern
Noise, dust, exhaust	Short-term nuisance / local air impacts	Low-Medium	Serviceable equipment; minimise idling; controlled movements	Low	Field Crew	Review following complaint or equipment change
Incorrect waste destination / record gap	Unlawful disposal / loss of traceability	Medium	Use authorised facility; verify acceptance; retain docket; provide copy to Contract Manager	Low	Administration	Review after missing docket or rejected load

8. Environmental Management Strategies

The following controls establish measurable objectives, performance criteria, actions, timing and responsibility as recommended by the NT EPA guideline.

Aspect	Objective	Performance criteria	Management actions	Timing	Responsibility
Waste segregation	Prevent incompatible mixing and uncontrolled waste accumulation	Waste streams clearly separated; no uncontrolled mixing observed	Segregate by type; use suitable designated areas/containers; assess unknown waste before handling	Continuous; inspect during routine service	Operations Lead / Field Crew

Aspect	Objective	Performance criteria	Management actions	Timing	Responsibility
Waste oil and liquids	Prevent release to land or water	No visible leaks, staining, sheen or uncontrolled discharge	Keep in sealed suitable containers; inspect lids/closures and container integrity; maintain spill response capability	At each inspection and before transport	Operations Lead
Batteries	Prevent electrolyte release and damage	Batteries upright, stable and free from active leakage	Segregate; protect from impact; isolate damaged units and manage promptly	At each inspection and before transport	Field Crew
Tyres / combustibles	Minimise fire and accumulation risk	Volumes remain manageable; no uncontrolled ignition sources or waste build-up	Maintain housekeeping; schedule removal monthly or earlier when quantity warrants	Routine and before dispatch	Operations Lead
Transport	Prevent load loss, spill and unlawful disposal	100% of loads secured; zero intentional releases; destination authorised	Inspect vehicle/load; secure containers; comply with applicable transport requirements; direct transport to authorised facility	Every load	Driver / Operations Lead
Stormwater	Prevent contamination of drainage and surrounding land	No visible contaminated runoff attributable to stored waste	Prevent leaks; keep contaminants contained; respond immediately to staining or runoff concern	Routine and following spill/rainfall concern	Operations Lead
Records / traceability	Demonstrate lawful disposal	Disposal evidence obtained for every load and provided to Contract Manager	Collect docket/receipt; reconcile to transport activity; retain controlled copy	Every load	Administration
Amenity	Minimise noise, dust, litter and exhaust	No substantiated recurring complaints; no persistent litter attributable to activity	Maintain equipment; minimise idling; secure waste; clean escaped material promptly	Continuous	Field Crew

9. Corrective Actions and Contingencies

9.1 Non-conformance

Where a control or performance criterion is not achieved, the responsible person will take immediate action to prevent further impact. The Operations Lead will record the issue, identify the cause, implement corrective action, verify effectiveness and escalate significant or recurring issues to the Managing Director.

- stop or isolate the source where safe
- contain and recover released material
- protect drains, soil and adjacent areas

- repair or replace damaged containers
- remove affected waste or contaminated clean-up material to an appropriate facility
- record photographs, quantities, cause and corrective action where relevant
- notify the Contract Manager and regulator where required
- review the risk assessment, procedure or training where the incident indicates existing controls are inadequate

9.2 Emergency response

The Emergency Response Plan applies to significant spills, fire, battery incidents, contaminated runoff, transport incidents, severe weather and unknown hazardous waste. Emergency response equipment appropriate to the activity will be maintained and accessible. Significant incidents will be notified in accordance with applicable statutory and licence requirements.

9.3 Transport incident

In a transport incident, the driver will prioritise personal and public safety, stop further release where safe, secure the area, contact emergency services where required, notify management, deploy spill controls if safe, and arrange recovery and lawful disposal. The incident will be documented and the load/vehicle controls reviewed before the activity resumes.

10. Environmental Monitoring

Monitoring is designed to verify that the performance criteria in this EMP are being achieved and that risks remain within acceptable levels. Monitoring is primarily inspection- and record-based because the activity does not involve routine process emissions or authorised discharges.

Monitoring item	Parameter / evidence	Frequency	Trigger / acceptance criterion	Record
Waste storage areas	Container integrity, segregation, litter, staining, accumulation	During routine facility inspection	No active leak; waste segregated; no uncontrolled accumulation	Inspection / service log
Waste oil / liquids	Leaks, closures, staining, sheen	Each inspection and pre-dispatch	No visible release	Inspection log / incident record
Batteries	Damage, stability, leakage	Each inspection and pre-dispatch	No active leakage; stored upright and secure	Inspection log
Stormwater / drainage	Visible contamination, sheen or unusual staining	After spill and when rainfall could mobilise contamination	No visible contaminated runoff attributable to activity	Inspection / incident record
Transport readiness	Container condition, load restraint, vehicle suitability, documents	Every load	Load secure and lawful before departure	Pre-dispatch check
Destination / disposal	Receiving facility docket / weighbridge ticket / receipt	Every load	Evidence obtained for 100% of loads	Waste movement / docket register
Complaints / amenity	Noise, dust, litter or	On receipt of complaint	Complaint acknowledged,	Complaints register

Monitoring item	Parameter / evidence	Frequency	Trigger / acceptance criterion	Record
	other concern		investigated and closed out	

Where monitoring indicates a recurring or significant issue, the monitoring frequency will be increased until the effectiveness of corrective actions is demonstrated.

11. Auditing

Implementation of this EMP will be audited internally at least annually, and more frequently where an incident, complaint, licence condition, regulator direction or repeated non-conformance indicates that additional assurance is warranted. The audit will assess compliance with this EMP, licence conditions, waste movement records, disposal dockets, training records, incident close-out and corrective actions.

Audit findings will be assigned to a responsible person with a target completion date. The Managing Director will review significant findings and verify close-out. An external audit will be arranged where required by the NT EPA, another approval condition, or where independent verification is considered necessary.

12. Reporting and Review

12.1 Reporting

- Disposal dockets or equivalent receiving-facility records will be retained for every waste transport event and copies will be provided to the Contract Manager.
- Environmental incidents, spills and non-conformances will be documented and reported internally without delay.
- Regulatory notifications and reports will be made within any timeframe specified by legislation or licence conditions.
- Complaints and stakeholder communications will be recorded and tracked to close-out.
- Monitoring and audit records will be retained as evidence of EMP implementation.

12.2 EMP review

This EMP will be formally reviewed at least annually and additionally following a significant environmental incident, material change in waste streams or quantities, change in licence conditions, change in transport method or receiving facility, audit finding, substantiated complaint, or regulatory direction. Changes will be approved by the Managing Director before implementation and submitted to the NT EPA where required by licence condition.

13. Training and Awareness

Personnel and contractors involved in the activity will receive training appropriate to their responsibilities before undertaking relevant tasks. Training records will be maintained.

- site and task induction
- EMP responsibilities and environmental duty
- waste identification, segregation and containment
- waste oil and battery handling controls
- spill prevention and response
- load restraint and pre-dispatch inspection
- incident and complaint reporting

- disposal docket and waste movement record requirements
- refresher or targeted training following incidents, audits or procedural changes

14. Consultation and Communication

Consultation will be proportionate to the environmental risk and community interest associated with the activity. The primary stakeholders are the NT EPA, the Department of Logistics and Infrastructure / Contract Manager, employees and contractors, authorised waste receiving facilities, transport personnel, neighbouring or nearby land users where relevant, and emergency services in the event of an emergency.

The Contract Manager will receive disposal dockets and will be advised of significant operational or environmental issues relevant to the contract. Complaints or concerns from the public or neighbouring landholders will be recorded, investigated and responded to. The NT EPA and other authorities will be notified where required by legislation, licence condition or incident significance.

Any proposed change that materially alters environmental risk will be communicated internally before implementation and, where required, discussed with the NT EPA or other relevant authority.

15. Records and Document Control

The following records will be maintained in a controlled and retrievable form:

- routine inspection and service logs
- pre-dispatch inspections
- waste movement records
- receiving facility disposal dockets, weighbridge tickets and receipts
- copies of disposal records provided to the Contract Manager
- environmental incident and spill records
- complaints and communication records
- training and induction records
- internal and external audit records
- corrective action records
- EMP review and revision history

Records will be retained for the period required by applicable legislation, licence conditions and contractual requirements. Where no specific period applies, records will be retained for a reasonable period sufficient to demonstrate ongoing compliance and traceability.

Appendix A - EMP Compliance Checklist

This appendix maps the EMP to the matters identified in Attachment A of the NT EPA Guideline. It is included as an internal completeness check and may be removed from the submission if preferred.

Guideline characteristic	Status	Where addressed
Accurate, clear, unambiguous and auditable	Yes	Clear commitments use “will”; measurable records and responsibilities identified.
Defined scope and project overview	Yes	Sections 1 and 2.
Key contacts and responsibilities	Yes	Document Control and Section 4.
Legal and other obligations	Yes	Section 3.
Existing environment	Yes	Section 5.
Conceptual site model	Yes	Section 6.
Environmental risk assessment	Yes	Section 7.
Objectives, criteria, actions, timing, responsibilities	Yes	Section 8.
Corrective actions and contingencies	Yes	Section 9.
Monitoring objectives and program	Yes	Section 10.
Auditing commitments	Yes	Section 11.
Reporting and EMP review	Yes	Section 12.
Training and awareness	Yes	Section 13.
Communication strategy	Yes	Section 14.
Management-system relationship	Yes	Section 4.
Implementation of environmental assessment outcomes	Not applicable	The current activity has not been subject to a PER or EIS.
Stakeholder consultation documented	Yes / ongoing	Section 14; consultation will be proportionate to risk and licence requirements.

Guideline characteristic	Status	Where addressed
Consultation with NT EPA	Application process	The EMP is being submitted as part of the NT EPA licence application process.

References

- Northern Territory Environment Protection Authority, Guideline for the Preparation of an Environmental Management Plan, May 2015, Version 1.0.
- Pristine Pools and Spas Pty Ltd, Standard Operating Procedure 3 - Dundee Waste Transfer Facility.
- Pristine Pools and Spas Pty Ltd, Risk Management Procedure.
- Contract Q23-0278 - Dundee Grounds and Waste Facility Maintenance Services.
- Environmental Monitoring Plan - Dundee waste collection and transport activities.
- Emergency Response Plan - Dundee waste collection and transport activities.
- Consultation and Communication Plan - Dundee waste collection and transport activities.