

Sell and Parker Pty Ltd • 98 000 101 315  
Sell and Parker Holdings Pty Ltd  
Precision Oxycut  
Lorross Pty Ltd  
Sell and Parker (International) Pty Ltd

11 Meadow Way  
(off Baker Street)  
Banksmeadow NSW 2019  
PO Box 755 Matraville NSW 2036  
**www.sellparker.com.au**  
**Telephone (02) 9316 9933**  
Facsimile (02) 9316 8133

## ENVIRONMENTAL POLICY

Sell and Parker are committed to achieving a clean and healthy environment by providing services, conducting operations, and recycling material that will not cause harm to the environment.

We operate within an Environmental Management System based on the internationally recognised specification for environmental management, AS/NZSISO 14001:2004.

To uphold our commitment to the environment, we will:

- Ensure all employees, contractors and other stakeholders have an understanding of our Environmental Policy and Safe Working Procedures.
- Ensure all operations are undertaken in an environmentally responsible manner and in accordance with the relevant environmental legislation, regulations, statutory obligations and relevant voluntary codes of practice.
- Regularly review our business operations to identify and implement opportunities for improvement.
- Record, investigate and implement the appropriate corrective action for all environmental incidents.
- Periodically review and revise our Environmental Policy and Safe Working Procedures to maintain their relevance.

**Group General Manager**

Date for review 01.09.2014



# ENVIRONMENTAL MANAGEMENT PLAN

## BUSINESS DESCRIPTION

Sell and Parker Pty Ltd operate a number of Metal Transfer and Processing facilities throughout Australia. As part of the ongoing management of these sites we have developed a comprehensive Environmental Management system to evaluate, monitor and manage our sites.

Our facilities incorporate a number of environmental controls including:

1. An inspection procedure to identify any possible/hazardous waste materials such as asbestos;
2. All storm water is directed to an oil/grit separator to remove sediments and possible hydrocarbons prior to discharging to the storm water drainage system. Sell and Parker metal recycling yards incorporate state of the art ECOSOL units in which third parties monitor and maintain. Examples of the reporting are at the end of this document.
3. Waste from the facility will be removed from site by an appropriate contractor.
4. Customer and General public control and management. All personnel who haven't undergone a site induction will be isolated to vehicle viewing areas only. Appropriate signage and fencing will be supplied

## TRAINING

All employees, regardless of company position or work duties will undergo an induction process to ensure they are familiar with the site's operations and management systems. The purpose of the induction is to ensure all personnel are aware of their environmental responsibilities and have obtained a basis to fulfil such responsibilities.

The induction will address:

- Personnel responsibilities
- Incident and non-conformance reporting procedures
- Storm-water environmental issues

Additional training will be given to personnel on site, including where relevant any contractors or sub-contractors working on the site.

The training will include:

- Incident and emergency response (including the use of spill kits);
- The prevention of water pollution, (the importance of bunding, oil/water separators, storm-water system design, water quality monitoring procedures);
- Waste storage and disposal;
- Storage and handling of dangerous goods;
- The prevention of air pollution (dust mitigation, road maintenance); and
- Control of incoming assets, inspection of assets and identifying prohibited components.

# **ENVIRONMENTAL MANAGEMENT PLAN**

## **ENVIRONMENTAL PROCEDURES: FUEL, OIL, CHEMICAL AND OTHER DANGEROUS GOODS MANAGEMENT**

Material Safety Data Sheets (MSDSs) will be kept for all chemicals used or stored on the site.

A register will be established and maintained detailing the type and quantities of chemicals, fuels and oils stored on site.

Spill kits will be available and used for any spill involving fuels, chemicals or oils that occur out of the bunded area.

The development will comply with the requirements of the NSW Fire Brigade with regards to the hydrant system, contaminated fire water containment, emergency access and fire hazard management.

In the event of an emergency, personnel must follow the emergency Evacuation "Plan that forms part of the Operation Manual.

Emergency response procedure will be clearly displayed on the premises for both public and staff information at all times

## **MONITORING, PERFORMANCE EVALUATION AND REPORTING**

### **MONITORING**

Monitoring of the environmental performance of Sell and Parker facilities will consist of site inspections by:

- a) Facility management representatives;
- b) Construction contractor representatives; and
- c) Operations personnel.

All employees will be encouraged to be aware of their own environmental responsibilities and to report any incidents or weaknesses in the environmental management on site. This will be achieved through induction programs and onsite training

### **INCIDENT RESPONSE**

An environmental incident will be regarded as any incident that did or had the potential to harm the environment.

In the unlikely event that an environmental incident occurs the following steps will be followed immediately:

- Prevention of further pollution / environmental harm by ceasing pollution causing activity;
- Clean up and/or control polluting substance;
- Implement mitigation measures to prevent recurrence of similar incident; and report and document incident, instigate incident investigation.

Incidents likely to cause off site impacts or significant environmental harm will be reported to the EPA immediately in accordance with legal requirements.

# ENVIRONMENTAL MANAGEMENT PLAN

## REPORTING

### Monitoring Reporting

Following the carrying out of site inspections, a report will be completed highlighting any observations or corrective actions required to improve the environmental management on site. Any corrective actions will be acted upon and signed off upon completion.

### Incident / Non-conformance Reporting

Identified issues of non-compliance with the management plan shall be recorded and reported. The Site Manager is responsible for ensuring that any non conformances are corrected and the necessary steps to prevent recurrence are put into place.

All non-conformances / incidents will be documented and reported. If the incident represents a legislative or Condition of consent breach, the Facility Manager will liaise with the relevant regulator to ensure any statutory reports are compiled in a timely manner.

Incident reports will:

- Be accurate and complete;
- Be clear and sequence the events leading to the incident
- Identify all causal factors;
- State corrective actions already taken;
- Recommend corrective action to reduce or eliminate the probability of recurrence;
- Recommend corrective action to improve the management system;
- Be reviewed and signed off; and
- Be timely

### Statutory Reporting

The Site Manager will be responsible for submitting any reports required under the Conditions of Consent, EPA License or other statutory requirements.

# **ENVIRONMENTAL MANAGEMENT PLAN**

## **COMPLAINTS MANAGEMENT**

Any complaints will be taken seriously.

The company has a complaints register to document any complaints received from the public.

The complaints register details:

- a) Date and time of the complaint;
- b) Method by which the complaint was made;
- c) Any personal details of the complainant which were provided or if no such details were provided, a note to that effect;
- d) The nature of complaint;
- e) The action taken in relation to the complain, including any follow-up contact with the complainant; and
- f) If no action was taken, the reasons why no action was taken.
- g) The complaints register will be reviewed by management monthly. The record of a complaint will be kept for at least 4 years.

## **EVALUATION AND REVIEW**

This management plan and the company's broader approach to environmental management will be reviewed to ensure:

- Information and environmental management strategies remain current;
- Opportunities for improvement are identified; and
- Changes to legislation, license and approval conditions are complied with.

Reviews shall take the following forms:

- Management consideration of issues on an ongoing basis;
- A formal review three months after assuming operations; and
- Thereafter on an annual basis.

# CLEANING AND MAINTENANCE REPORT

Sell and Parker Metal Recycling  
9 January 2012

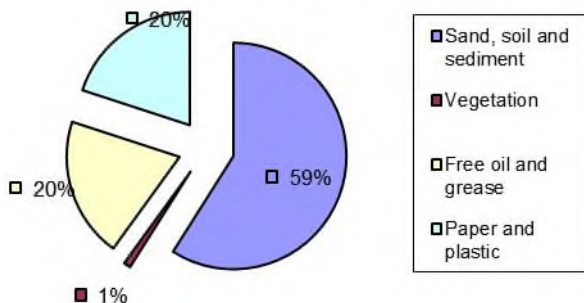


PO Box 6086  
Alexandria NSW 2015  
Phone: +61 2 9669 6000  
Fax: +61 2 9669 6100  
Email: info@ecosol.com.au  
Website: www.ecosol.com.au



A view of unit A after being cleaned

## Composition of Pollutants



During the clean both the central capture silo and the clean chamber areas of the units were thoroughly vacuumed and washed out. The areas behind the screens were also thoroughly flushed out using a directional cleaning attachment and any fine pollutants remobilised in this process were also removed by vacuum method.

Upon removal of the waste, the screens and other areas of the units were inspected and confirmed to be in good operating condition.

### Summary

Ecosol will continue to monitor and clean these units as required under our current contract. Should you have any questions regarding this clean or if you require any further information please do not hesitate contact us.

For further information on Ecosol's maintenance and cleaning services, please contact our NSW office on 1300 706 624.

Site: 11 Meadow Way  
BANKSMEADOW NSW 2019

Unit:	A	B
	RSF 4200	RSF 4300

Pipe Size:	150mm	300mm
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TFR:	51l/s	120l/s
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Capacity:	0.23m <sup>3</sup>	0.32m <sup>3</sup>
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### Cleaning Details

The scheduled clean commenced at 12:30pm and was completed safely and efficiently within 1½ hours. Both units had retained a significant amount of hydrocarbons and a small amount of other stormwater pollutants as detailed in the adjacent graph.

The units remain in good operating condition thereby confirming that the current maintenance regime is both necessary and effective.

The composition of captured pollutants included:

59%	Sand, soil and sediment
1%	Vegetation
20%	Free oil and grease
20%	Paper and plastic



A view of unit B after being cleaned

# Gross Pollutant Trap Inspection Form

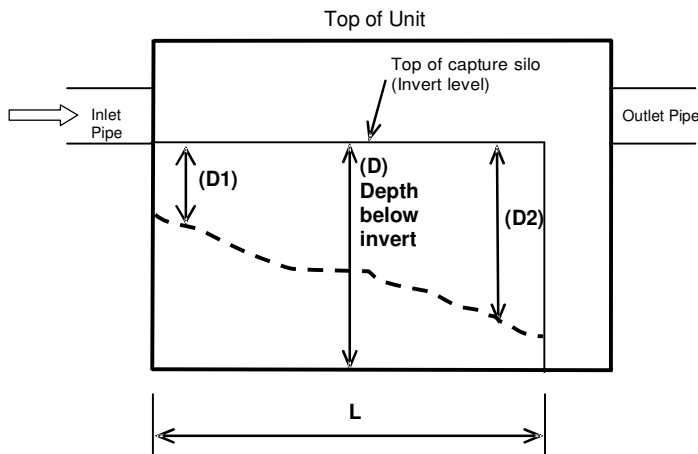


## ECOSOL RSF 4000 SERIES

Asset Owner:	Sell and Parker	Asset ID:	A
Unit Location:	8 Everett Street, Carrington NSW (rear of property)	Ecosol Ref:	4959E
Date:	24 January 2012	Time:	8:30am
Inspected By:	Aaron Cortese	Prod Code:	RSF 4300

VISUAL INSPECTION				
	Good	Fair	Damaged	Remarks
Access Covers	✓			
Access Cover Surrounds	✓			
Surrounding Surfaces	✓			
Internal Components	✓			
Other				
Floatables Visible	Yes			

## EXTENT OF CAPTURED MATERIAL



Unit Size	D (m)	L (m)	Width (W) (m)	Silo Vol. (m <sup>3</sup> )
4200	0.600	1.310	0.250	0.23
4300	0.600	1.500	0.300	0.32
4450	0.900	2.250	0.450	1.03
4600	1.200	3.000	0.600	2.43
4750	1.500	3.750	0.750	4.83
4900	1.800	4.500	0.900	8.30
41050	2.100	5.250	1.050	13.11
41200	2.400	6.000	1.200	19.52
41350	2.700	6.750	1.350	27.88
41500	3.000	7.500	1.500	38.16
41800	3.600	9.000	1.800	65.64

### ELEVATION OF CAPTURE SILO

D =	0.600m	D1 =	0.500m	D2 =	0.500m	Dav. = (D1+D2) / 2 =	0.500m
L =	1.500m	W =	0.300m	Volume Captured = (D - Dav.) x L x W			0.05m <sup>3</sup>

Date of last clean (if known):	30 November 2011	(schedule clean if 4 months or more)
Measurable surface hydrocarbons, or similar:	Minimal	(schedule clean if YES)
Percentage vol. (vol. captured / silo vol. x 100 =	15.63 %	(schedule clean if greater than 60%)

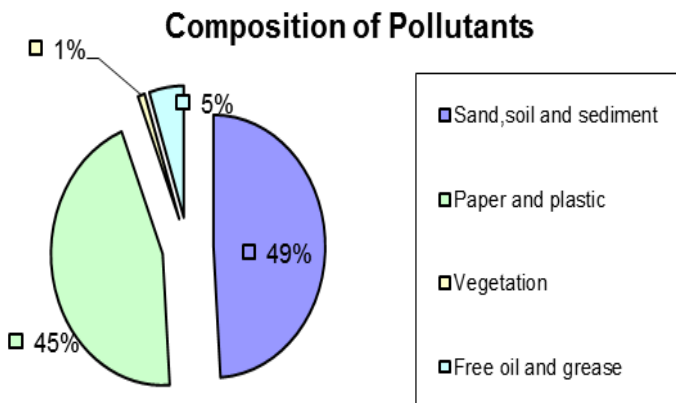
### WORK CARRIED OUT OR SCHEDULED MAINTENANCE


# CLEANING AND MAINTENANCE REPORT

**Sell & Parker**  
**28 March 2012**



A view of the unit before the clean.



Both the central capture silo and the clean chamber areas of the unit were thoroughly vacuumed and washed out. The areas behind the screens were also thoroughly flushed out use a directional cleaning attachment and any fine pollutants were removed via vacuum. This area behind the screens ensures the unit's effectiveness in treating the required treatable flow rate.

## Summary

Upon removal of the waste, the screens and other areas of the unit were inspected.

Ecosol will continue to monitor and clean this unit in accordance with our maintenance contract. Should you have any comments or further requirements please feel free to contact us at any time.

For further information on Ecosol's maintenance and cleaning services, please contact our NSW office on 1300 706 624.

**Site:** 313 Pacific Highway  
COFFS HARBOUR NSW 2450

**Unit:** **RSF 4450**

**Pipe Size:** 450mm

**TFR:** 260 L/S

**Capacity:** 1.03m<sup>3</sup>

## Cleaning Details

The clean commenced at approximately 9:00am and took 3 hours to complete. As this unit had a significant amount of hydrocarbons captured within the capture silo, a cleaning contractor who specialises in removing oil and grease had to be called in to perform this clean.

After we removed the lids to the unit, we could immediately see, as per the inspection reports, that this unit had captured a significant amount of hydrocarbons, as well as large and sharp debris such as car parts. This is obviously due to the type of work that goes on at this site. The sharp debris can cause damage to internal components of the unit, so we will be putting together a proposal to install a stainless steel trash basket in the upstream pit, for pre-treatment of large pollutants that can damage the unit. This will be a manually removable basket that can be easily cleaned as required.

The captured pollutants included:

- 49% Sand, soil and sediment
- 1% Vegetation
- 5% Free oil and grease
- 45% Paper and Plastic



A view of unit after the clean

# CLEANING AND MAINTENANCE REPORT

Sell and Parker Metal Recycling  
12 January 2012



PO Box 6086

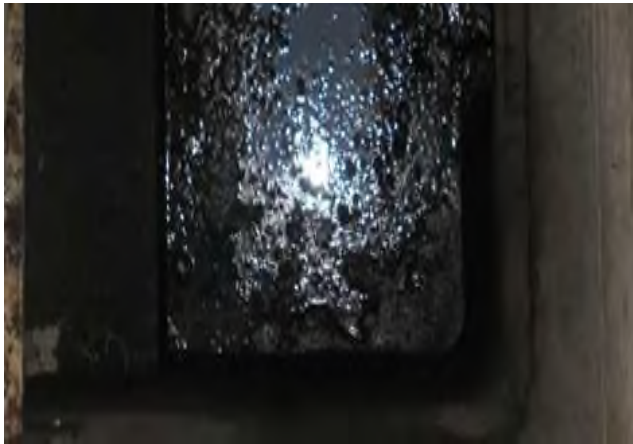
Alexandria NSW 2015

Phone: +61 2 9669 6000

Fax: +61 2 9669 6100

Email: [info@ecosol.com.au](mailto:info@ecosol.com.au)

Website: [www.ecosol.com.au](http://www.ecosol.com.au)



A view of the unit before the clean

**Site:** 7 Bosci Road  
**INGLEBURN NSW 2565**

**Unit:** Q-Guard A1 3030

**Pipe Size:** 300mm

**TFR:** 26l/s

**Capacity:** 0.54m<sup>3</sup>

## Cleaning Details

The unit was cleaned early in the morning to minimise disruption to the local environment. Works commenced at 6:30am and were completed safely and efficiently within 1 hour.

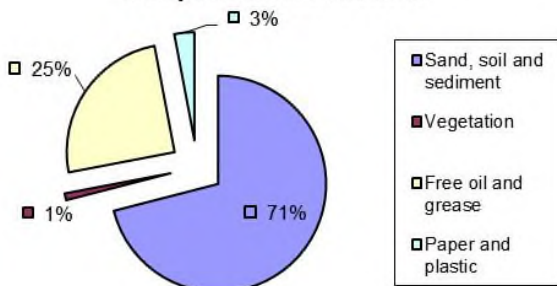
As the unit had retained a significant amount of hydrocarbons within the capture silo, a specialised cleaning was engaged to remove excess free oil and grease.

Both the central capture silo and the clean chamber areas of the unit were thoroughly vacuumed and washed out as part of the cleaning process. Additionally the areas behind the screens were also thoroughly flushed out using a directional cleaning attachment and any fine pollutants resuspended in this process were also removed by vacuum method.

The composition of captured pollutants removed from the unit included:

71%	Sand, soil and sediment
1%	Vegetation
25%	Free oil and grease
3%	Paper and plastic

## Composition of Pollutants



On conclusion of the clean we are pleased to confirm that the unit is now operating efficiently. With regular cleaning, the unit will continue to operate within E.P.A. guidelines and will significantly reduce the impact gross pollutants and emulsified hydrocarbons will have on the receiving waterways.

## Summary

Ecosol will continue to monitor and clean this unit as required under our current contract. Should you have any comments or further requirements please feel free to contact us at any time.

For further information on Ecosol's maintenance and cleaning services, please contact our NSW office on 1300 706 624.



A view of the unit after being cleaned

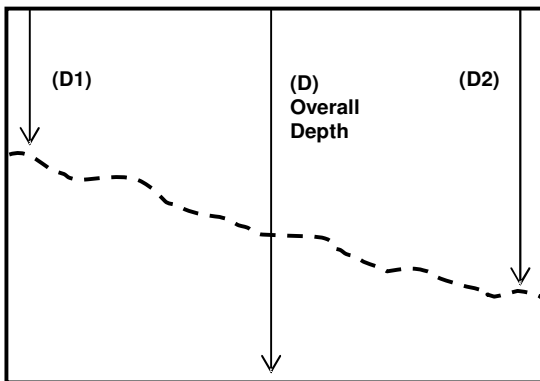
# Gross Pollutant Trap Inspection Form



## STORMWATER PITS

Asset Owner:	Sell and Parker	Asset ID:	
Unit Location:	106 Long Street, Smithfield NSW	Ecosol Ref:	4959D
Date:	26 April 2012	Time:	2:20pm
Inspected By:	Louise Reid	Prod Code:	

### EXTENT OF CAPTURED MATERIAL



Unit ID	D (m)	L (m)	(W) (m)	Silo Vol. (m <sup>3</sup> )
Pit A	2.400	1.200	1.200	3.456
Pit B	2.400	1.200	1.100	3.168

#### PIT A

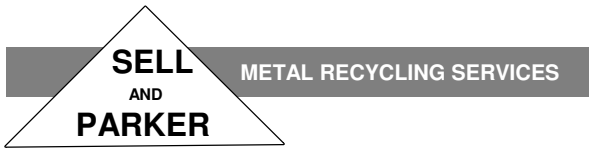
D =	2.400m	D1 =	2.400m	D2 =	2.400m	Dav. = (D1+D2) / 2 =	2.400m
L =	1.200m	W =	1.200m	Vol. = (D - Dav.) x L x W	0.00m <sup>3</sup>	Vol. capt. / silo vol. x 100 =	0.00%

#### PIT B

D =	2.400m	D1 =	TBC	D2 =	TBC	Dav. = (D1+D2) / 2 =	TBC
L =	1.200m	W =	1.100m	Vol. = (D - Dav.) x L x W	TBC	Vol. capt. / silo vol. x 100 =	TBC

Date of last clean (if known):	5 March 2012	(schedule clean if 4 months or more)
Measurable surface hydrocarbons, or similar:	Yes	N/A
Percentage volume	Refer above	(schedule clean if greater than 40%)

COMMENTS
Pit B covered with machinery and inspection not completed



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AUSTRALIA  
PO Box 755 Matraville NSW 2036  
**www.sellparker.com.au**  
**Telephone (02) 9316 9933**

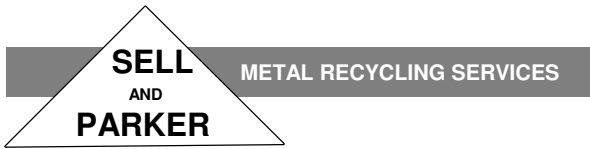
## Pollution Incident Response Management Plan

Sell & Parker

45 Tattersall Road

Blacktown NSW 2148

Number:  
Revision:  
Date: September 2012

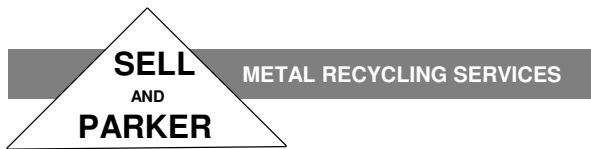


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AUSTRALIA  
PO Box 755 Matraville NSW 2036  
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## Pollution Incident Response Management Plan

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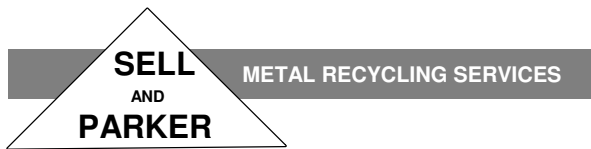
11 Meadow Way  
Banksmeadow NSW 2019  
AUSTRALIA  
PO Box 755 Matraville NSW 2036  
**www.sellparker.com.au**  
**Telephone (02) 9316 9933**

## Purpose and Scope

This pollution Incident Response Management Plan (PIRMP) applies to Sell & Parker Blacktown site.

The purpose of this PIRMP is to define the following aspects of managing the response to pollution incidents on the site:

- Pollution incident response procedure overview
- Notifying relevant authorities
- Notifying nearby premises that may be affected



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## **Pollution Incident Response Procedure Overview**

### **1. Immediate Response**

- Ensure the safety of people
- Identify the materials involved
- Contain the incident

### **2. Assess the Level of Risk**

- Has the incident resulted in harm to the environment?
- Is the incident likely to result in harm to the environment?
- Is the incident affecting or likely to affect people or property on nearby premises?

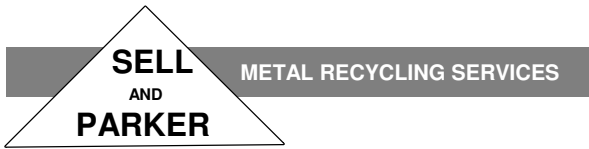
### **3. Notify Relevant Authorities if Necessary**

### **4. Notify Nearby Premises if Necessary**

### **5. Notify Sell & Parker Senior Management**

### **6. Clean-Up**

### **7. Reporting, Recording, Investigation and Corrective Action**



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PO Box 755 Matraville NSW 2036  
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### Notifying Relevant Authorities if Necessary

Sell & Parker will notify the following authorities immediately on becoming aware of a pollution incident that causes or is likely to cause harm to the environment

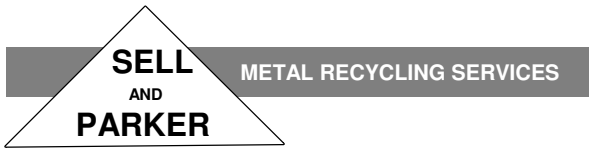
Authority	Contact Number
Environment Protection Authority	131 555
Work Cover Authority	131 050
Ministry of Health SW Parramatta PHU	9840 3603
Fire and Rescue NSW	000

### Harm to the environment means:

- Actual or potential harm to the health or safety of people or to ecosystems that is not trivial
- or
- Actual or potential loss or property damage exceeding \$10,000

Harm to the environment includes harm or loss that is either on or off Sell & Parker premises





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## **Notifying Nearby Premises if Necessary**

If pollution incident is likely to affect the health and safety of people or property damage on nearby premises, Sell & Parker shall provide notifications to effected premises:

- Immediately on becoming aware of a pollution incident which is affecting, or is likely to affect, nearby premises
- At regular intervals throughout the duration of the pollution incident, appropriate to the nature of the incident and the level of risk
- At the conclusion of the pollution incident

## **Methods of Notification**

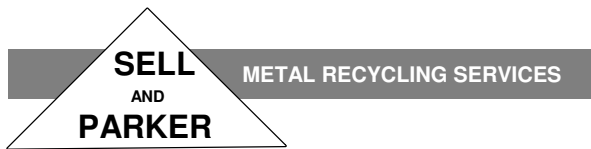
The methods of notification will be appropriate to the nature of the incident, the level of risk, and the number and type of premises affected.

Notifications will be by one or more of the following methods:

- Telephone
- In person, door –to-door
- Letterbox drops
- By Emergency Services personnel

## **Notifications to Nearby Premises by Emergency Services**

If emergency services respond to and take control of a pollution incident they may also take control of communications with nearby premises, including conducting evacuations if deemed necessary. In such circumstances the Sell & Parker person responsible for managing the response to the pollution incident will liaise with Emergency Services so as to have a clear understanding of who is responsible for communications with nearby premises.



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## Information to be provided

1. Nature of incident
  - E.g. chemical fumes, smoke, airborne dust, flammable gas
2. The specific pollutant involved
  - E.g. LPG, steel dust, vapour, toxic smoke
3. Nature of risk
  - E.g. exposure to fumes, smoke or dust; fire or explosion
4. Level of risk
  - Negligible. No immediate response required
  - Minor – recommend prepare for evacuation or other appropriate actions to protect people and property
  - Major – recommend evacuation or other appropriate actions to protect people and property
5. The likely duration of the incident

**Legend**

**Risk Rating 1 (High)** – Immediate action to be taken to reduce risk, consider cease work

**Risk Rating 2 (High)** – Action within 24 hrs, risk must be eliminated or controlled

**Risk Rating 3 (Medium)** – Action within 48 hrs, risk must be eliminated or controlled

**Risk Rating 4 (Medium)** – The risks should be reduced but is not an emergency

**Risk Rating 5, 6 (Low)** – The risks should be reduced when time permits

**RISK  
RATING**

Likelihood	Consequence			
	Fatality Perm Injury	Long term serious injury	Medical treatment Several days lost	First Aid
Very Likely	1	1	2	3
Likely	1	2	3	4
Unlikely	2	3	4	5
Very Unlikely	3	4	5	6

**General – Risk Assessment**

Hazards	What are the risks (What can happen)	Risk Rating (High, Med, Low)	Recommended Controls	Person Responsible