

VANZ Plan

Stormwater Management Plan - CTT

MAN-14636-1

Issue Date: 30/07/2021

PURPOSE	This Stormwater Management Plan (SMP) has been prepared in accordance with conditions 52, 56 and 102 of the COCs for the Clyde Transfer Terminal (CTT) to ensure that stormwater is successfully controlled and managed during the operation of the CTT.
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Scope	This SMP has been prepared to provide the management measures implemented to minimise potential stormwater related adverse impacts during the operation stage of the CTT.
Review Frequency	Yearly

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Rev	Revision Details	Issued to	Date
0.1	First draft for internal review	NSW Resource Recovery Technical Team ANZ People & Safety SHEQ Team	06 November 2020
0.2	Second draft for internal review	NSW Resource Recovery Technical Team ANZ People & Safety SHEQ Team	29 July 2021
0.3	Final draft	Department of Planning, Industry and Environment	30 July 2021

Definitions/Abbreviations

See definitions in the **BMS Dictionary** - Only definitions directly pertaining to this document are included.

Subject	Definition
BMS	Business Management System
ссс	Community Consultative Committee
СТТ	Clyde Transfer Terminal
сос	Conditions of Development Consent
DA	Development Application
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EP&A	Environmental Planning and Assessment (Act and Regulations)
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan
OEMP	Operational Environmental Management Plan
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations Act 1997
RMS	Roads and Maritime Services
SMP	Stormwater Management Plan
ТРА	Tonnes per annum
Veolia	Veolia Australia and New Zealand
WHS	Work Health and Safety (Act and Regulation)

1. Introduction

1.1. Overview

Veolia Australia and New Zealand (Veolia) operates the Clyde Transfer Terminal (CTT), which is located within a portion of the Clyde Rail Yard, at 322 Parramatta Road, and forms part of Lot 201 of DP10076683 in the Cumberland Local Government Area. Refer to Site Layout Plan in **Appendix A** of the Operational Environmental Management Plan (OEMP).

The CTT facility has been approved by the Department of Planning, Industry and Environment (DPIE) to receive up to 600,000 tonnes per annum (TPA) of waste from within the Sydney Region, in accordance with section 75W of the *Environmental Planning and Assessment Act 1979*. Waste is containerised and loaded onto rail wagons for transportation by rail to the Woodlawn Eco Precinct (owned and operated by Veolia) in the Southern Tablelands (approximately 250 kilometres southwest of Sydney) for treatment, recycling and energy recovery.

The CTT includes the following infrastructure:

- An access road for waste trucks entering and exiting the facility from Parramatta Road.
- Incoming and outgoing weighbridges to check the waste type and weight of the waste being delivered to the facility.
- An enclosed building for the unloading and handling of waste, with environmental controls such as dust suppression and odour control systems.
- A hardstand area for temporary storage and maneuvering of full and empty sealed shipping containers prior to loading on to trains.
- Rail sidings for the loading of containers onto trains for rail transport to Woodlawn.

The Minister of Planning approved the Development Application (DA) 205-08-01 on 29 August 2002, in accordance with section 89 (e) of the Environmental *Planning and Assessment Act 1979* (EP&A Act).

In addition, an Environment Protection Licence (EPL) has been issued under the *Protection of the Environment Operations Act 1997* (POEO Act) by the NSW Environment Protection Authority (EPA).

This Stormwater Management Plan (SMP) has been prepared in accordance with conditions 52, 56 and 102 of the COCs for CTT to ensure that stormwater is successfully controlled and managed during the operation of the CTT.

1.2. Scope and Objectives

The purpose of this SMP is to provide stormwater management procedures to form part of the CTT Operational Environmental Management Plan (OEMP), in accordance with the COCs, EPL, relevant legislation and as part of Veolia's Business Management System (BMS).

The OEMP is the working environmental management tool for the operation of the CTT, concentrating on key environmental issues, including supporting detailed plans for the management of water quality, waste, traffic, air quality, noise, contamination, pest and vermin and emergency response.

The objectives of the SMP are to:

- Provide a comprehensive plan for the management of stormwater during operation of the CTT;
- Protect water quality, by preventing storm and surface water flows impacting on sensitive receptors;

- Prevent surface water pollution and discharges of any contaminated water from the CTT; and
- Comply with the relevant regulatory requirements.

1.3. Legal and Other Requirements

The following regulatory framework applies to this SMP:

- Development Consent (DA 205-08-01) issued under the *Environmental Planning and Assessment Act* 1979
- Environment Protection Licence (EPL 11763) issued under the *Protection of the Environment Operations Act 1997* (POEO Act)

1.3.1. Conditions of Development Consent

COCs related to the Stormwater Management Plan are detailed in Table 1.1 below.

Relevant Conditions	Requirement	SMP Reference
52	The Stormwater Management Plan must describe the post construction measures to be employed to operate and maintain the stormwater controls at the premises in a manner that minimises the pollution of waters.	Noted and addressed in Section 4 (Stormwater Management Measures) of the Stormwater Management Plan (SMP)
56	The Applicant shall prepare and implement a detailed Environmental Monitoring Program for the proposed development. The program shall include, but is not necessarily limited to, all the monitoring required by this Consent, the environment protection licence, the EMP (Construction Stage) and the EMP (Operation Stage) for the development. The program must: (a) Identify the environmental issues to be monitored (b) For each issue, indicate whether its monitoring is required by this Consent, the environment protection licence, the EMP (Construction Stage), the EMP (Operation Stage), or by another instrument (c) Set standards and performance measures for each issue (d) Describe in detail how each issue is to be monitored, who will conduct the monitoring, how often the monitoring will be conducted, and how the results of the monitoring will be recorded and reported to the Planning Secretary and other relevant authorities (e) Indicate the actions taken and procedures to be followed if any non-compliance is detected.	Noted in Section 5.3 (Environmental Monitoring Program) in SMP

Table 1.1 Conditions of Consent Requirements

102	shall be consistent with the Storr catchment. Where a Stormwater been prepared the Scheme shall contained in Managing Urban St	of the development. The controls nwater Management Plan for the Management Plan has not yet be consistent with the guidance ormwater: Council Handbook ntrols shall incorporate minimum	Noted and addressed in Section 3.1.3 (Stormwater System) in SMP
	Development component	Minimum level of stormwater treatment	
	Undeveloped sections of access road	Existing overland flow to Duck River	
	Roof water	On-site detention	
	Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units	First flush system, GPT, oil and grease separation, on-site detention	

1.3.2. Environment Protection Licence

EPL No. 11763 stipulates the environmental obligations for Veolia under s120 of the POEO Act to make all efforts to control the pollution of water from the CTT.

Conditions E2.1 and E2.2 set out requirements in relation to the management of spills and other liquid discharges on site as detailed in **Table 1.2** below.

Relevant Conditions	Requirement	SMP Reference
E2.1	 While the licensee's premises are being used for the purpose to which the licence relates, the licensee must: (a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents. (b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. (c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA. 	Noted and addressed in the following sections of the SMP: a) Section 5.3 (Exceedances and Corrective Actions) b) Refer to Section 4.2.2 of WMP c) Section 1.4.2 (Community)

Table 1.2 Environment Protection Licence Requirements

E2.2	After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must: (a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; (b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.	Noted
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1.4. Stakeholder Consultation

As part of an ongoing commitment to stakeholder engagement, Veolia implemented a program of communication and consultation during the preparation of this SMP. Veolia has consulted with government agencies and other key stakeholders.

The key issues raised during consultation for stormwater and leachate impacts included accidental spills or leaks, flooding capacity and discharge levels and leachate contamination causing pollution of surrounding areas.

1.4.1. Government Bodies

The following government bodies will be consulted with in relation the requirements of this SMP:

- NSW Department of Planning and Environment;
- NSW Environment Protection Authority;
- Cumberland Council
- NSW Office of Water

1.4.2. Community

Veolia aims to ensure that the local community is kept informed of the progress of the project in a proactive and responsive manner. Veolia's communication may include the following where applicable:

- public notices and announcements;
- meetings and correspondence with appropriate regulatory authorities; and
- discussions with adjoining landowners / neighbours who may be affected by the CTT.

The key objectives of the community focused communication and consultation program include:

- Educating stakeholders regarding key aspects of the CTT; and
- Informing community groups and neighbours to help Veolia understand concerns.

The following avenues provide availability of information about the CTT:

- Dedicated Veolia webpage: <u>https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</u>
- Community telephone line and email address:

Location	Contact	
CTT 24 hour feedback line	(02) 9841 2600	
Dedicated email address	clyde.weighbridge@veolia.com	

- Published Monitoring Reports: <u>https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</u>
- Published Monitoring Data: <u>https://www.veolia.com/anz/about/about-veolia/operational-compliance/nsw-monitoring-reports</u>

2. Goals of SMP

The goals of the SMP are to:

- To protect water quality by preventing contaminated storm and surface water impacting on sensitive receptors;
- To prevent surface water pollution due to contaminated surface water discharges from the CTT;
- To confirm the detailed design of the leachate management and collection system on site;
- To ensure that on-site systems for leachate management operate according to design and are maintained to ensure on-going effectiveness in managing all on-site leachates, and,
- When triggered for construction activities, to confirm that, all residual soil management issues have been addressed and confirm any on-going monitoring requirements for the facility with respect to soil management.

2.1. Roles and Responsibilities

Responsibilities for implementation of this SMP are summarised in Table 2.1 below.

Action	Responsibility	Timing
Overall implementation of the SMP	Facility Manager	Ongoing
Induct site personnel on the site safety and environmental requirements of the SMP prior to commencing any work on site	Facility Manager or nominee	Commencement of operations and site inductions for new employees
Coordinate site environmental monitoring, compile reports and maintain internal records	Facility Manager and Monitoring personnel	As per monitoring schedule
Identify Non Conformances and notify CTT Management/ Veolia Safety Health Environment Quality Representative	Facility Manager or nominee	As required
Authorise and confirm the implementation of mitigation measures	Facility Manager	Ongoing
Training and communication	Facility Manager or nominee	Ongoing
Monitoring the effectiveness of the control measures	Facility Manager or nominee	As required
Environmental compliance monitoring	Monitoring Personnel	As per monitoring program
Maintain internal records of monitoring	Monitoring Personnel	Ongoing

Table 2.1 SMP Roles and Responsibilities

3. Existing Environmental and Operational Impacts

3.1. Existing Environment

The CTT site is located on the Cumberland Plain. The topography of the site and surroundings is generally flat to the Parramatta River, which is approximately 2.5km to the north. The land then rises steeply to a distinct ridgeline. To the south, the topography is also relatively flat, while to the northwest of the site, the Duck River is incised into this level landscape. Within the site the topography is generally flat with a gentle slope of the site to the north, towards Parramatta Road.

3.1.1. Soil and Groundwater

The CTT EIS (Maunsell McIntyre, 2001) provided details regarding the soil and groundwater. The soil of the CTT is generally characterized as being highly disturbed with a significant volume of material present on the site identified as imported fill.

An investigation of the CTT site (RSA, 1997) identified the soil profile within the site as follows:

- The depth of fill on the site ranges from 1.2m 4m (to refusal);
- The top layer of fill material is composed of a mixture of ash and gravel material, with a small area, on or adjacent to the site access way, which has been filled with aggregate or blue metal;
- The natural underlying material appears to be silty clay material, with different types of fill material being used over the years to slowly build up and level out the surface of the site;
- The fill material is a mixture of ash, gravel, sand and clay material, with the predominant mixture being ash and gravel. The fill mixtures are found inconsistently throughout the soil profile and indicate that the site was built up slowly with material which could be sourced locally.

The consistent presence of ash throughout the soil profile suggests that the ash may have originated as a byproduct of the coal combustion process used to generate energy for the local steam locomotives.

3.1.2. Flooding and Drainage

A review of available flood profiles as per the CTT EIS (Maunsell McIntyre, 2001) has found that the risk of flooding of the site from Duck River is not high. Based on these profiles the river bank would not be overtopped from the 20 year, 50 year or 100 year storm events.

3.1.3. Stormwater System

The design of the CTT stormwater management system (initially established in 2001 and upgraded in 2017) (**Appendix A**) can be summarised as follows:

- Leachate is the liquid generated from decomposing waste or from water that has come into contact with waste.
- Stormwater and leachate are handled using separate systems. Leachate and contaminated water is collected in the on-site leachate tank and is transported using an ISO tanker to the Woodlawn Bioreactor for disposal or is treated at an appropriately licenced facility.

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- The site's stormwater is handled using the two on-site detention ponds, Pond 1 and Pond 2.
- Stormwater runoff generated from the roof of the transfer building is directed to Pond 2 before being discharged through a Humeceptor to Duck River.
- Surface water runoff from the Container Storage hardstand, Compactor Apron and car park are processed through the Pond 1 First Flush system, which is divided into three sections.
 - During a rainfall event (greater than 10mm) the system functions as follows:
 - Zone 1A Container Yard, Apron and Car Park
 - Surface water runoff from the Container Yard, Apron and Car Park enter Pond 1 via the Entry Zone until it spills into Zone 1A (75,000L)
 - When 1A is full, the water fills Zone 1A and the Entry Zone equally until it spills into the Central Bypass Channel to Duck River via the Oil/Water separator and Gross Pollutant Trap
 - The First Flush water in the Entry Zone and Zone 1A is removed from site as leachate after the rain event.
 - Zone 1B Waste Shed Ramp, Weighbridge and Turning Circle
 - Surface water runoff from the Waste Shed ramp, weighbridge and turning circle is collected in Zone 1B (45,000L)
 - The Waste Shed Ramp runoff collects in two drains that meet in a pit under the Hot Load Zone, a pump then transfers the water into Zone 1B.
 - The surface water runoff that comes under the weighbridge runs by gravity into Zone 1B.
 - The surface water runoff from the turning circle drains to a small pit and is then pumped into Zone 1B.
 - All water in Zone 1B is transported by Rail ISO Tanker or by road to a licenced treatment facility for disposal or treatment respectively.

The retention basin has been designed for a one (1) in 100 year storm ARI and has a permissible discharge of 80L/s/ha. This conforms to the Upper Parramatta River Catchment Trust guidelines "On-Site Stormwater Detention Handbook".

3.2. Predicted Stormwater Impacts

The EIS identified potential site contamination and water quality impacts and related risks associated with the operation of the CTT.

Table 3.1 lists the key impacts and risks. This risk assessment is used to determine the level of mitigation required for those impacts.

Issue	Potential Environmental Risk	Potential Impact	Risk Rating	Existing Controls	Reference
Leachate leak from containers in container storage area	Pollution of waters and harm to the environment.	Leachate generated at site may pollute the natural water bodies	Moderate	 Containers are maintained on a regular basis to prevent any leakage from the Containers. All the waste related activities take place in the waste shed 	Section 3.1.3 of SMP

Table 3.1 Soil and Water Impact Risk Rating

				and compactor area. - No waste is handled in the open hard stand area - Pond 1 & 2 Shut off valves - Sweeper truck - Pond 1 First Flush system	
Storage capacity for waste water in Pond 1-Zone 1B is exceeded during extreme wet weather and diversion to stormwater occurs	Pollution of waters and harm to the environment.	Waste water may enter Duck river	Low	 Pond 1B is emptied as soon as a rain event ends. Pond 1B is maintained in an empty state. The level of the pond is monitored on a regular basis during rain events. Tanker trucks are pre-booked in preparation for rain events. 	Section 3.1.3 of SMP
Litter on the driveways	Contaminate the stormwater runoff	Quality of the stormwater runoff does not meet the discharge standards	Low	 A daily litter run is conducted. A Road sweeper sweeps all hardstand areas daily. All waste tipping is conducted inside the waste shed. 	Section 4.1.1 of SMP

4. Stormwater Management Measures

4.1. Stormwater Management Plan

The CTT stormwater system ensures that stormwater generated on site is collected and discharged, in a controlled manner, into Duck River, via a culvert and headwall as shown in **Appendix A**.

Stormwater runoff from the container yard, apron and car park is diverted to a large first flush system. After 10mm of rain, the runoff will then divert into Duck River.

Stormwater runoff from the southern rail line and waste shed roof are diverted to Pond 2 and is treated in an oil/silt separator (humeceptor) located at the North Western side of the CTT's office and amenity buildings prior to discharging into Duck River.

Stormwater captured from the roof of the transfer and office/amenity buildings, classified as "clean", is directed straight to the stormwater retention pond or the rainwater tank for reuse on site.

Stormwater from the hot load area (refer to Appendix A) passes through the oil/water separator under normal operation. When a hot load is disposed of in the area, the firewater is collected and stored in a dedicated underground tank. This stored liquid is classified as leachate and is disposed of appropriately off site at a licenced facility in accordance with NSW Environment Protection Authority (EPA) requirements.

4.1.1. Treatment

The stormwater treatment system for the CTT has been designed to treat stormwater contaminants that have the potential to be present at the facility. Types of possible contaminants include:

- Gross pollutants (cigarette butts, paper, wind blown matter);
- Oil and grease; and
- Leachate

The treatment system effectively removes the contaminants from the stormwater prior to final discharge into Duck River.

Gross pollutants are minimised through routine litter patrols and housekeeping of the site perimeter for wind blown material.

The CTT building floor has been designed so that any water that may come into contact with the waste is directed to the leachate sump, for collection and treatment at an appropriate disposal facility or disposal at Woodlawn.

4.2. Leachate Management Plan

The leachate management system is independent of the stormwater system, ensuring that separation between rainfall run-off and leachate is maintained. The gradient of the waste shed floor leads to the Compactor chutes. Therefore, as soon as waste is tipped any associated liquids (leachate) is captured in the leachate system.

Leachate generated during compaction and associated equipment cleaning water is captured in the leachate system tank. The leachate tank has a capacity of 32 kilolitres (kL) and is located in the north-western end of the

Compactor area. All leachate from the tipping floor, compacting process and compactor wash-down water is captured in the tank.

Leachate, as described above, is disposed of in accordance with regulatory requirements. That is, leachate is either pumped into a dedicated ISO tanker that is transported by rail to the Woodlawn Eco Precinct or into road tankers and transported to an appropriately licenced facility.

4.3. Other Control Measures

A self-bunded diesel storage tank is also located at the CTT. All refuelling takes place in close proximity to the tank. The pump has an automatic cut off incase of hose failure and spill control materials are available in plentiful supply in the area.

Hot Loads, defined as a waste collection vehicle where it is identified or the driver suspects fire on-board, are tipped in a separate area away from other waste and where the fire services have easy access. The area at the CTT site marked "Hot Load" has a separate storage tank so that any water used to douse a smoulder/fire can be transported to a licensed facility. Refer to the <u>Hot Load Management Work Instruction (WIS-5541)</u>.

5. Stormwater Monitoring and Reporting

5.1. Monitoring Program

In accordance with Condition 56 of the Development Consent, an Environmental Monitoring Program (EMP) has been prepared to detail the monitoring schedule, calendar and locations for all environmental aspects.

Using water quality parameters outlined in the following guidance documents, a number of parameters have been established for surface water monitoring at the CTT, as detailed in **Table 5.2** below. These include physical, chemical indicators and inorganic parameters.

- Protection of The Environment Operations (POEO) Act, 1997; and
- Australian and New Zealand Guidelines for Fresh and Marine Water Quality, 2000.

Neither surface water nor groundwater monitoring are regulatory requirements for the CTT. If required, monitoring of surface water will be undertaken and assessed against the following discharge quality limits.

Parameter	Frequency	Standard	Criteria / Performance Measure / Trigger
рН	As required, or following a significant	The Australian Water Quality	6.5 to 8.5
Suspended solids	rainfall event (>100mm)	Guidelines for Fresh	No greater than 50mg/L
Oils and grease		and Marine Waters (ANZECC, 2000)	No visible films or odour
Litter			No visible litter washed (or blown) from the site

Table 5.1Stormwater Runoff Discharge Requirements

5.1.1. Maintenance

Inspection of the stormwater treatment system is carried out on a regular basis and after significant rainfall events. Debris is removed when identified by inspection, or on a programmed basis. Any material accumulated within the retention basin or the silt/oil chamber is removed manually or by high suction vacuuming and disposed of in an approved manner.

Checking and cleaning out the treatment system, as well as inspections for the pumps and retention pond are part of the stormwater maintenance procedure for the CTT. Other stormwater maintenance involves visually inspecting pits and drainage points as part of the Weekly Site Inspection Checklist. Cleaning out of the humeceptor and inspection of culverts for obstructions are undertaken on a biannual basis, or as required.

5.2. Performance Reporting and Review

Annual management reviews of the environmental performance of the CTT will assess the continuing suitability, adequacy and effectiveness of the on-site environmental management measures implemented. This review will include performance against the goals of the SMP.

Where performance reporting is required under the COCs or EPL, all relevant environmental monitoring data and information will be recorded and maintained on site. This will include, but not be limited to, the following:

- Sampling dates, times and name of sampler;
- Chain of Custody, analysis and results;
- Complaints received and corrective actions taken; and
- Copy of the EPL, development consent and other relevant approvals.

Veolia will use monitoring data to review and identify any exceedances against the adopted goals with the appropriate corrective actions applied as discussed below.

Details of compliance reporting requirements are provided in Section 5.1.2 of the OEMP.

5.3. Exceedances and Corrective Actions

5.3.1. Surface water, Groundwater and Leachate Response Plan

In line with the regulatory requirements, a response plan has been prepared detailing the measures to be implemented in response to any surface or groundwater contamination that may arise through operation of the CTT, as well as a protocol for the investigation, notification and mitigation of any exceedances of the respective trigger levels.

Handling of any water and leachate related incidents will be managed in accordance with the process outlined in Section 4.4 of the OEMP. The Facility Manager, or their site nominee, will record and manage all incidents in accordance with Veolia's incident notification and reporting procedures. Incidents will be managed in

accordance with the Incident Management Standard or on a case by case basis depending on the severity of the incident as described in Section 5.1.1 of the OEMP.

At completion of any investigation, any corrective actions required will be recorded and managed in accordance with the NSW Corrective Action Procedure in a timely manner.

An <u>Emergency Response Plan (MAN-5569)</u> (ERP) has been developed for the CTT site. The ERP, which incorporates the Pollution Incident Response Management Plan, identifies the procedures to be followed in the event of an emergency. The process for dealing with potential incidents and emergencies at the CTT is summarised in **Figure 5.1**.

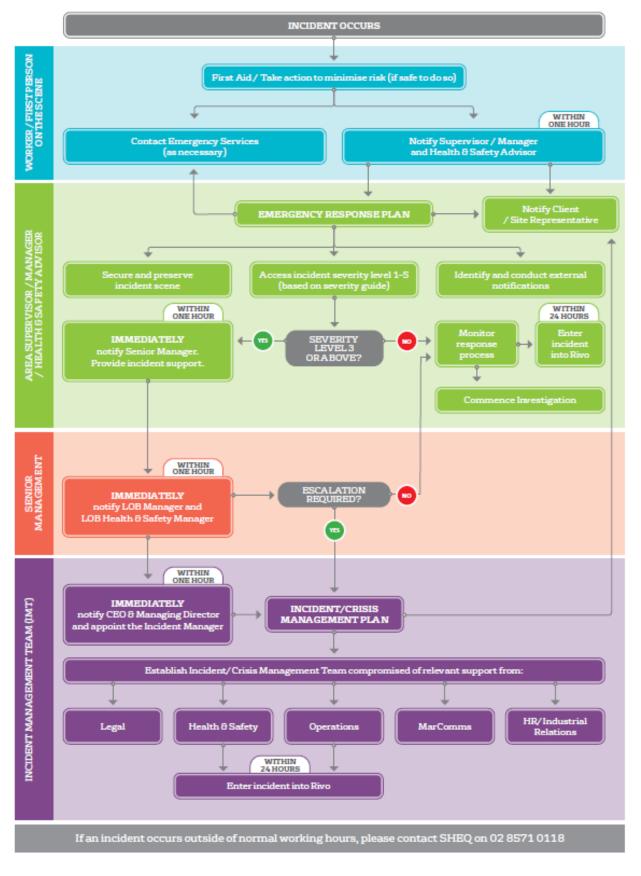


Figure 5.1 Incident Response Process Map

This process guides any response to surface water, groundwater or leachate contamination through such incidents as spills or discharges, which may include the use of absorbent material to contain the spill/discharge.

Spill kits are available onsite at all times and training in their use is provided to all CTT personnel.

Any fuel, lubricant, or hydraulic fluid spillage is contained in absorbent spill materials, with contaminated material disposed of to a licensed waste facility. A typical spill response procedure to be followed by Veolia is summarised in **Figure 5.2** below.

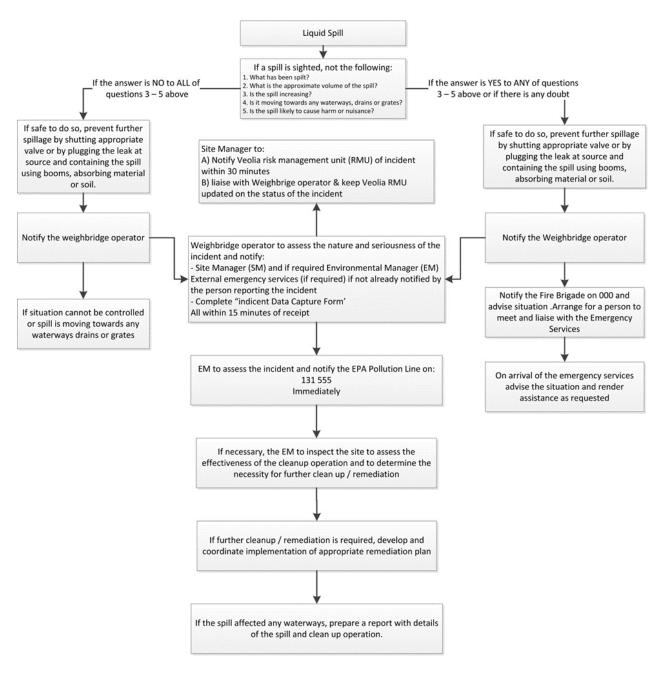


Figure 5.2 Typical Spill Response Flow Chart

5.3.2. Spill Response

In the event of a spill, the liquid and solid spill emergency procedures are to be followed, as detailed in the Emergency Response Plan (ERP).

5.4. Publishing of Monitoring Data

Where required, Veolia publishes the results of any environmental monitoring required under the EPL on the following website:

https://www.veolia.com/anz/about/about-veolia/operational-compliance/nsw-monitoring-reports

References

Document Name

Maunsell McIntyer (2001a). *Clyde Transfer Terminal Environmental Impact Statement,* Maunsell McIntyer Pty Ltd. August 2001.

Maunsell (2001b). *Clyde Transfer Terminal Supplementary Environmental Impact Statement,* Maunsell Australia Pty Ltd. December 2001.

Appendix A - Stormwater Management System