



PREMIER
METAL RECYCLERS



Site Management Plan

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1 Introduction

1.1 Scope

The scope and context of the Premier Metals Management System is to address the main provisions of waste management, including the waste metal collection, processing, disposal and the ongoing operations and maintenance. The SMP provides the framework to manage and control the environment aspects of the daily site operation and this Site Management Plan has been developed in accordance with the requirements and the relevant planning documentation. The aim of this plan is to further minimise and manage potential adverse environmental impacts from the operational activities. It provides the environmental controls that will be implemented for the activities and sets out conditions under which the project will proceed.

Premier Metals is operating as scrap metal recycling company that uses heavy equipment and machinery to separate, and then process scrap metal into different grades and sizes for export or on-sale to metal foundries. Equipment and machinery employed for the processing of scrap metal is dependent on the nature (size, location, design, etc.) of the facility and typically includes.

All the Premier Metals employees, sub-contractors and visitors shall meet the requirements of this document as applicable to the scope of works. The effective implementation of this management plan is the responsibility of each member of the entire team, which includes sub-contractors and visitors.

1.2 Purpose

The site management plan aims to meet the needs of Premier Metals, ensure legal compliance, provide for continuous improvement, and minimise adverse impact on the environment. The site management plan details the actions necessary to implement the Premier Metals Environment Policy and achieve the agreed environmental objectives.

The SMP is the key environmental management document that Operation Managers rely on to ensure appropriate environmental management practices are followed during the operation and activities.

- Comply with and to meet local government, and community expectations for protection of the environment.
- Identify the potential environmental impacts from the operational activities and document mitigation measures for their management.
- Implement controls to effectively mitigate environmental impacts throughout the operation.
- Detail the legal and other obligations of the operation and ensure compliance.
- Ensure that personnel are fully aware of their environmental obligations.
- Minimise community inconvenience resulting from the operational activities.
- Establish the roles and responsibilities that Premier Metals employees and others have in implementing this plan and the mitigation measures/controls.
- Ensure employees are provided with sufficient training, development, and support to recognize, avert and if necessary, effectively manage an environmental incident or non-conformance.

1.3 Policies

Premier Metals Integrated Management System has been designed and implemented as a means of ensuring that quality products and services are provided in a safe manner whilst addressing all relevant environmental impacts. It serves to act not only as the company Quality, Health & Safety and Environment manual, but also as a bridging document to demonstrate our alignment with and compliance to the following International Standards Organisation documents:

- ISO 9001:2015 Quality Management Systems
- ISO 45001:2018 Occupational Health and Safety Management Systems
- ISO 14001:2015 Environmental Management Systems.

Our processes address all activities including operational, strategy, environmental and occupational health and safety. In addition to standardising our work practices across all aspects of our business, the Premier Metals Management System is designed to ensure that all work is undertaken in accordance with all relevant legislation, regulations, and standards with the flexibility to meet Client requirements and specifications. Therefore, this document also references

various state-based legislation and federal legislation, where required, whilst detailing responsibilities and accountabilities defined in applicable Western Australian WHS Legislation.

Premier Metals is committed to achieving world class health and safety performance across all work departments. Premier Metals provides a working environment in which its employees can fulfill their duties with minimum exposure to hazards and risk to their health and wellbeing.

2 Operational Management

Premier Metals will deliver site operations through ongoing consultation with the community and stakeholders.

2.1 Stakeholders

- Government Departments, Local Council, Department of Environment
- WA Worksafe
- DFES
- WA Police
- Public
- Contractors
- Suppliers

2.2 Contractors

Contractors and subcontractors are responsible for complying with all statutory obligations and are to exercise all possible care for the health and safety of their personnel and other persons at the workplace who may be affected by their activities.

Subcontractors must at all times comply with either the Premier Metals policies or procedures or with their own policies and procedures providing that the subcontractor's health and safety management system meets the relevant statute and contractual obligations.

Premier Metals conducts initial and ongoing evaluations of subcontractors to ensure they have adequate management systems in place and considered the impacts in relation to any contracted work as per the Third-Party Selection and Management

2.3 Hours of Operation

The standard hours of site operation and the procedure and process for works are set out below.

The general working hours are:

- 7 am – 5 pm, Monday to Friday
- 7 am – 1 pm, Saturday and
- No work on Sundays or public holidays.

During various stages of operation, there may be instances where additional hours of operation may be applied. These may occur when:

Out of hours Deliveries During the various stages of the site operation, there will be instances where oversized deliveries or pickups are necessary. As oversized movements can cause disruptions to the existing traffic, it is required for these movements to occur during the off-peak hours where traffic volumes are typically at their minimum.

2.4 Site Induction

All visitors and contractors will be required to complete an on-line induction that covers the site safety, policies, and PPE element with a competency assessment. This Site Induction addresses the conditions of entry.

General Environmental Duty: "All staff, contractors and visitors must not undertake any activity that pollutes or may pollute the environment unless the person takes all reasonable and practicable measures to prevent or minimise any resulting environmental harm.

2.5 Toolbox Meeting

We will implement monthly toolbox meetings. The toolbox meeting will be in conjunction to safety, quality and health. After each toolbox meeting we will continuously review the topics discussed. If any deficiencies or remedial actions have been noted, the name of the person responsible for the action will be recorded, along with the date for completion.

2.6 Waste Processing

Best practice environmental management strategies have been developed to minimise the impacts including the product storage, processing, transporting, and disposing activities.

Best practice management strategies are used to ensure ongoing minimisation of an activity's environmental harm are developed by considering several components:

- Hierarchy of controls
- Monitoring of environmental receptors.
- Monitoring of environmental releases.

The current site use involves the following.

- Heavy metal sorting and cutting.
- Metal oxy acetylene cutting.
- End of life vehicle dismantling
- Non-ferrous sorting and recycling; and
- Processed metal loading and removal.

All vehicle dismantling and depollution activities are undertaken in accordance with Premier Metals Environmental Management System. No fluids or hazardous material will be retained on the subject land and all open yard spaces will be cleaned regularly of any debris and excess contaminants. The vehicles are depolluted at depollution station where all fluids and contaminants will be removed before dismantling the vehicle in this process and sent to a separate recycling operation for re-use or safe disposal.

Premier Metals accepts the following waste types as per the table below.

Waste Type Acceptance

Environmental Objective	Target
Scrap Metal (Ferrous and Non-Ferrous)	(a) Car bodies (b) Machinery (c) White Goods (d) Light gauge (mixed) scrap (e) Heavy gauge Steel (f) Non – Ferrous (g) E Waste
Hazardous Waste	Acceptance of used lead acid batteries only, for storage and disposal offsite.

2.7 Product Receipt

Recyclable scrap metal materials are commonly delivered to site from either smaller scrap metal yards owned by the facility or external contractors and private operators in various vehicles (for example, trucks, Utes, trailers, semi tippers) where they are weighed, screened (inspected and graded) and received by the facility prior to sorting and processing.

Due to a combination of factors, such as the presence of a payment-by-weight based system, difficulty and expense encountered in disposing of hazardous materials by alternative means (for example, landfill), and a general lack of public awareness of the scrap metal recycling process, it is not uncommon for unacceptable 4 materials to be either

inadvertently presented on site for disposal, or intentionally concealed in the waste load (for example, hidden in EOLVs).

The product inspection needs to be undertaken by the unloading personnel under product receipt activities, therefore, to eliminate the presence of unacceptable materials on site through effective screening. Below are the list of prohibited materials.

- Asbestos
- Used pressure vessels (for example, liquid petroleum gas (LPG), oxygen, acetylene)
- Non-metallic refuse (for example, tyres, foam)
- Chemical substances (for example, pool chlorine, paints)
- Hazardous substances (for example, syringes, needles, and sharps)
- Flammable or explosive substances (for example, fuels and solvents)
- Poisonous materials (for example, bleaches, cleaning products and disinfectants)
- Closed or sealed containers
- Drums that have not been neutralised and certified as clean with tops removed.
- Radioactive material

2.8 Product Storage and Disposal

Materials are stored on site in designated stockpiles or areas waiting either on-site processing or off-site disposal / recycling. Products and waste materials are commonly stored in the following categories:

- EOLVs for dismantling and Processing
- Ferrous scrap metal for processing through Shear / Cutting
- Non-ferrous scrap metal for processing through Shear / Cutting
- Tyres for sorting and transfer off site
- Pressure vessels for decommissioning and processing through Shear / transfer off site
- Liquid waste (for example, hydrocarbons, battery acid) for transfer off site
- Batteries for transfer off site
- Materials awaiting oxy-acetylene cutting prior to processing through Shear / Cutting
- Containing contaminants such as foam, plastic, dirt, hydrocarbons, and heavy metals.

2.9 Waste Storage and Disposal

The storage of waste fluids from the vehicles such as brake fluid, engine oil, radiator coolants etc. will be kept in a safe, designated area away from any potential collision with forklifts or other vehicles. These areas are undercover and will have Bunding that would secure liquid storage areas. The disposal of waste liquids and solids will be undertaken by approved authorised waste collectors such as Cleanaway, Suez etc.

Spill kits are available near the waste storage location and contain the following:

- Absorbent material
- Container for waste absorbent
- Shovel, broom, dustpan, and gloves
- Catch trays for spills.

Licensed waste collection companies such as Cleanaway will provide the following waste management services for Premier Metals

- Waste Oil
- Waste Fuel
- Wastewater
- Waste Coolant

Suez Waste Management

- General Waste collection

Red Hill Waste Management Facility

- General Waste collection

3 Environmental Management

3.1 Environmental Management System

The site management plan aims to meet the needs of Premier Metals, ensure legal compliance, provide for continuous improvement, and minimise adverse impact on the environment. The site management plan details the actions necessary to implement the Premier Metals Environment Policy and achieve the agreed environmental objectives.

All relevant environmental legal requirements are identified and recorded on an Environmental Legal Obligation Register. A review of legislative changes and their impact on Premier Metals operations is conducted annually.

The SMP provides requirements in the areas of:

- Planning & Review
- Implementation
- Monitoring and Evaluation
- Review and Improvement

The SMP is the key environmental management document that Operation Managers rely on to ensure appropriate environmental management practices are followed during the operation and activities.

3.2 Environmental Assessment Criteria and Actions

Table 3 provides guidance on recommended action for various assessment criteria thresholds during and following development assessment. As part of the review process, Premier Metals Project Manager will ensure that all recommended actions are taken into consideration.

Assessment Criteria and actions

Environmental Impact	Recommended Action
Groundwater /Stormwater Contamination	<ul style="list-style-type: none"> • Control measures and monitoring by bunding the area immediately and take cleaning action. • Clean stormwater diversion around site • Hydrocarbon and refuelling areas bunded • Spill kits accessible on site and well-maintained • Site tidiness and general waste hierarchy practices
Surface Water Contamination	<ul style="list-style-type: none"> • Must be maintained free of leaks and defects
Equipment utilised for metal recycling processing	<ul style="list-style-type: none"> • Must be maintained in good working order and • Must be operated in a manner that ensure related noise and vibration emissions comply with Environmental Protection Regulation.
Fragmenting/Shredding Equipment	<ul style="list-style-type: none"> • Must incorporate a dust extraction system that is maintained in good working order. • Must only operate in conjunction with the dust extraction system. • Must be fitted with noise abatement cladding; and • Must be operated in a manner that ensures related noise and vibration emissions comply with the Environmental Protection (Noise) Regulations 1997.
Oxy-cutting area and Equipment	<ul style="list-style-type: none"> • Oxy-cutting area must be kept free of combustible materials including vegetation and organic litter; and • Any combustible materials that cannot be removed must be covered using suitable guards or covers during cutting activities.
Vehicle Processing Area	<ul style="list-style-type: none"> • All liquid waste from the vehicle must be drained prior to dismantling and the processing area must flow into a sump containing a dedicated oil water separator.
Granulator	<ul style="list-style-type: none"> • Located within an undercover area; and • Ground area to be maintained free of non-conforming waste types.
All on site fire prevention equipment	<ul style="list-style-type: none"> • All on site fire management and prevention equipment including, but not limited to: • Hose reels and a water cannon to be stored so access is not impeded by infrastructure or equipment; and

- All on site fire management and prevention equipment must be always maintained in good working order.

3.3 Environmental Mitigation measures

Environmental mitigation measures are necessary to meet the requirements comprises a series of control tables that have been developed to address each of the operational environmental hazards and risks identified in the Aspects and Impacts.

Following is a complete list of the management plans and relevant sections that have been included in this SMP.

Mitigation Measure	Responsibility
The SMP shall be updated in line with changes to work plans. All workers shall be advised of changes to the activities and procedures.	Operation Manager / Management
All employees shall be inducted about site environmental conditions and sensitive areas as identified in this SMP and receive training, as appropriate. Induction and training records shall be kept and maintained;	Operation Manager / HR
All pollution incidents that threaten or harms the environment shall be reported immediately to relevant authorities	Operation Manager / Management
A Hazardous Material Register and respective Safety Data Sheets (SDSs) shall be always kept on site and regularly maintained;	Operation Manager

3.4 Noise Management

Mitigation Measure	Responsibility
Noise generating works shall be undertaken in accordance with the standard hours of work within the approved SMP are as follows: <ul style="list-style-type: none"> - Monday to Friday 7:00am to 5:00pm. - Saturday 8:00am to 1:00pm. 	Operation Manager Machine Operators
Well maintained and low noise generating machinery would be used and machinery operated at the minimum necessary power setting;	Operation Manager
Regular inspection and maintenance of equipment and machinery to ensure that it is in good condition;	Operation Manager
Machinery and equipment would be operated in an effective manner to minimise noise	Operation Manager
Workers would be inducted about noise from the works and reduction strategies	Operation Manager
Noise monitoring would be undertaken if community complaints are received to ensure that noise mitigation measures have been effectively implemented.	Operation Manager
Regular inspection and maintenance of equipment and machinery to ensure that it is in good condition.	Operation Manager
Machinery and equipment would be operated in an effective manner to minimise noise	Operation Manager
Well maintained and low noise generating machinery would be used and Machinery operated at the minimum necessary power setting.	Operation Manager

3.5 Traffic management

The objective of this Traffic Management is to provide traffic management procedures to form part of the Premier Metals Site Management Plan. The objectives of the traffic management plans are to describe the measures to ensure that:



- Provide a convenient, safe, and appropriate environment for everyone entering the site.
- Manage and control vehicular movements to and from the site.
- Maintain current on street parking in the vicinity of the site where practical.
- Maintain safety for all workers, visitors, and sub-contractors.
- Maintain appropriate access to the site for excavation and construction traffic.

Traffic Operational Activities


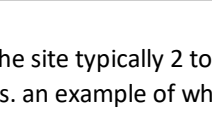
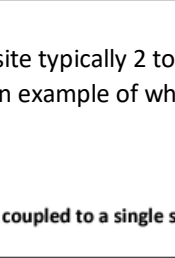

All transport vehicles enter the site from Kelvin Road, and then via the incoming weighbridge. Vehicles accessing the non-ferrous area of the transfer terminal building drive in via the entry door on the corner of the building. before exiting via the same entry, on the alternate side.

Operational Vehicle Types

The number of daily vehicles accessing the site is forecast to vary from 3 to 30 vehicles every day. The forecast daily volume of vehicles for each time onsite will be between 3 to 5 trucks. A range of heavy vehicle types will be onsite, with the majority of vehicles being most of the trucks are 2 axle rigid trucks starting at a Gross Vehicle Mass of around 3.5 tonnes. The following will illustrate the size of heavy vehicles during operation to and from the site.

Rigid Trucks		Coding	GVM / GCM (tonnes)
2-axle rigid		R11	15.5
3-axle rigid		R12	23.0
4-axle rigid		R22	27.5

Rigid Trucks will be entering the site typically 2 to 4 trucks at a time having between two and five axles and GVMs between 24.5 and 39.5 tonnes. an example of which is shown in Figure below. They range in length between approximately 9 m and 11 m.

Single articulated vehicles (prime mover coupled to a single semi-trailer)		Coding	GVM / GCM (tonnes)
3-axle semi, single drive, single axle		A111	24.5
4-axle semi, single drive, tandem axle		A112	32.0
5-axle semi, single drive, tri-axle		A113	35.5
5-axle semi, tandem drive, tandem axle		A122	39.5

Management Measures

Traffic monitoring during the operations will be undertaken, generally in accordance with daily heavy vehicle movements, Weekly management meetings will take place with all key parties ensuring safety issues and program schedules are reviewed and minuted. Any revision to plans or documentation will be noted.

Prior to any oversized movements, all necessary oversize and/or over mass permits will be obtained. If deemed necessary by guidelines, liaisons between Police and relevant local authorities will be held to manage and formulate the route of the oversized vehicles and machinery.

Mitigation Measure	Responsibility
Traffic, transportation and access mitigation and management strategies shall be implemented as part of the SMP and updated as required. This shall include:	Operation Manager Project Manager
Transportation, heavy vehicle, and equipment delivery shall be undertaken in accordance with Main Roads	Operation Manager Project Manager
A requirement to adhere to traffic speed limits both on and off-site	Operation Manager Project Manager
A requirement to obey all traffic signs	Everyone

3.6 Air Quality Management

Air quality can have major impacts on human and environmental wellbeing. Management principles are designed to reduce and control the effects of air pollution generated from on and off-site activities on adjacent receptors, travelling public, workers and flora and fauna.

The generation of dust on and off site is considered to be the greatest contributor to adverse air quality impacts. However, this should be limited due to works undertaken to seal access roads and surrounding areas. Potential dust sources during operation are likely to be:

- Vehicle and machinery movements;
- Exhaust emissions; and

- Dust from the general work areas.

Mitigation Measure	Responsibility
Work areas, access points and driveways have been sealed. The remaining areas of the site are to be maintained to limit dust generation.	Operation Manager
General housekeeping, including sweeping, will be undertaken to limit the amount of dust in work areas.	All Employees
All dust-generating activities will be inspected daily. Management strategies for controlling dust that will be employed include the use of water carts, water mist sprays, reduced speeds, signage to vehicle drivers and plant/equipment and barriers.	Operation Manager
Vehicles and equipment shall be properly maintained to the manufacturer's specifications and comply with the Clean Air Regulation under the <i>Protection of the Environment Operations Act</i> .	Drivers
If necessary, dust suppression techniques shall be implemented, such as water spraying of surfaces and covering stockpiles	Operation Manager Manager
Air quality mitigation and management strategies shall be implemented in accordance with the SMP. This shall include: <ul style="list-style-type: none"> • Reducing vehicle speeds when in the yard to minimise the generation of dust. 	Drivers Contractors

3.7 Stormwater Management

The Stormwater management plan provide objectives for how stormwater should be managed in an area and a process to manage stormwater in a considered and coordinated manner that targets priority issues.

The Site Stormwater and Drainage Management Plan has been prepared in support of proposed shredder plant operation and to provide a set of Best Practice site management procedures to control the severity and extent of any contaminants discharge. The pollutant discharge from the site is minimised to meet Best Practice.

On-site Detention System

The whole site has been considered as a single catchment discharging to the council drain located at the front of buildings and carpark. Purceptor system will be installed at discharge point as a treatment system which is a filtration system, is an above- or below-ground device that allows the water to pass through filter media to remove pollutants.

Assessment Criteria and actions

The stormwater management will be based on the following hierarchy of control mechanism, using structural measures, such as treatment techniques or retention basins, to improve water quality and control run-off.

Activity	Environmental Impact	Source control options	Infiltration Controls	Primary Treatment Options
Drainage from all operational area	Generation of contaminated stormwater during rainfall event from operational areas (e.g., uncovered scrap metal stockpiles) and release off site or to groundwater.	<ul style="list-style-type: none"> • Clean stormwater diversion around site • Fragmentiser residues stored separately from tyres, foams, batteries, 	<ul style="list-style-type: none"> • Fragmentiser residues, batteries and liquid storages stored in hard stand areas. • Detention / filtration 	<ul style="list-style-type: none"> • Oil / water separator are installed in the warehouse and dismantling area. • Purceptor system will be installed at discharge point as a treatment system which is a filtration system, is an above- or below-ground device that allows the water to pass through filter media to remove pollutants.

		<p>and liquid storages. Separate drainage.</p> <ul style="list-style-type: none"> • Hydrocarbon and refuelling areas banded • Spill kits accessible on site and well-maintained • Site tidiness and general waste hierarchy practices. 	<p>ponds are lined.</p> <ul style="list-style-type: none"> • Concentrated flow drainage pathways are lined. • Access roads are sealed. • Operational areas sealed 	<ul style="list-style-type: none"> • Inspect and correct for significant sediment and debris accumulation on surface flow paths. • Clean-up of general site litter on a weekly basis, prior to anticipated heavy rainfall and after significant rainfall events. •
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The following are recommended best management practices that may be included in stormwater pollution prevention plans:

Inbound scrap quality control

Identify, inspect, educate, notify, verify.

- List potential incoming materials that pose a threat to the facility, the environment, or public safety (e.g., post-burn municipal scrap metal containing residual ash and oil and residues from turnings).
- Identify materials that are prohibited, and those that require special handling and are accepted only under certain conditions.
- Inspect incoming loads and the scale and/or when unloaded.
- Facility truck drivers may perform initial inspection during pickup.
- Provide appropriate quality control program information to suppliers, customers, and employees.

Spill prevention and response

Identify spill prone activities and areas:

- Fluid storage areas, equipment maintenance, fuelling operations, scrap vehicle processing and crushing, oily scrap and turnings storage areas, scrap processing areas, and any other areas where fluids are used or stored.

Prevent and contain spills and leaks:

- Provide secondary containment or double-walled tanks, especially for fluids stored outside, fix leaking equipment, contain all scrap-related fluids (solvents, oil, cutting fluids), take corrective action in areas where leaks or spills commonly occur. Comply with federal Spill Prevention Control and Countermeasure (SPCC) plan requirements, if applicable.

Spill response and cleanup, spill kits

- Be prepared. Have spill kits (typically granular absorbents, pads, and socks) wherever fluids are used or stored. Clean up spills immediately. Clean up stains. Keep spill kits well stocked.

Disposal of used absorbents

- Disposal of absorbents usually is subject to state regulation. Often the absorbents can be placed in trash and transported to landfill if absorbents are not saturated (no free-flowing fluids). Some states require that used absorbents be recycled or disposed of as a hazardous waste.

3.8 Environmental incident and response

Emergency Planning Procedure will be followed in the case of all emergencies. Premier Metals also have a Pollution Incident Response Management Plan as part of our Operational planning.

All incident investigations shall include the following basic elements:

- Identify the cause of the incident;
- Identify the necessary corrective action(s);
- Identify personnel responsible for carrying out corrective action(s);
- Implement or modifying controls necessary to avoid repetition;
- Record any changes in written procedures required.

3.9 Environmental Monitoring, Inspections & Audits

During the operation, environmental monitoring will be conducted to ensure compliance to legislation, as well as the objectives and targets stipulated in this SMP.

All regular environmental monitoring activities such as vehicle checks, inspections and audits will be detailed on the prestart checklist, The frequency and specific monitoring criteria will be assessed periodically throughout the operation to ensure that they are consistent with the aspects and impacts’ section of the Risk Register, as well as the current level of risk to the environment.

3.10 Environmental Management Plan and Legal Compliance Audits

Environmental audits are carried out as planned in accordance with SMP and Premier Metals will conduct a series of internal audits in addition to other inspections, to verify compliance with the SMP and Legal Compliance The monthly Environmental audit will focus on the compliance status of the operation against the Conditions of Approval and applicable legislation.

3.11 Fire Management

The risk of fire during operational works is a factor. Certain activities can increase the risk of fires, for example: potential ignition sources such as vehicle and equipment exhaust systems, and construction activities such as welding and grinding. Fires can cause damage to life, property and productivity and impact environmentally on flora and fauna.

Risk	Control Measure
Ignition of a fire onsite	<ul style="list-style-type: none"> • Identify and mitigate potential ignition sources. • implement no smoking areas and butt bins. Implementation of robust waste acceptance procedures that prevent unauthorised wastes from being accepted so far as possible and limiting their potential impact if received in error. • Segregation of wastes. • Use of effective signage designating waste type and quantity to be stored in each location. • Stockpile construction, size and arrangement. • Maintain high standards of house-keeping to ensure the site is free from loose/discarded combustible wastes and dusts as possible. • Design and maintain trafficable areas to allow vehicles to manoeuvre within the area for the purposes of stockpile management and maintenance.
Spread of fire across the facility	<ul style="list-style-type: none"> • Placement of non-combustible waste (i.e. loose glass, non-reactive metals) between combustible wastes. • Use of structural firebreaks (i.e., masonry walls between stockpiles) • Provisions for firefighting intervention. • Provision of assistance to firefighters.

3.12 Continuous Improvement

An evaluation of environmental management performance will be conducted against environmental policies, objectives, and targets for the purpose of identifying opportunities for improvement. The continual improvement process for the operation is designed to:

- Identify areas of opportunity for improvement of environmental management which leads to improved environmental performance.
- Develop and implement a plan of corrective and preventative action to address root causes.
- Verify the effectiveness of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement and
- Review performance against objectives and targets.

Implementation of strategies/ techniques to improve the environmental performance of the operation is the responsibility of the Operation Manager and Management Team. Project activities will also be reviewed and improved by the following means:

3.13 Environmental Monitoring Program

Issue	Monitoring Parameter	Frequency	Performance Criteria
Water Quality	Visual inspection for indications of silt-laden waters, waste waters or pollution (e.g., grease/oil, effluent)	Weekly and after each rainfall event	No visible pollution
Noise, Vibration, Odours, Traffic	Complaints	As and when complaint arises	No complaints from community, stakeholders, or authorities
Noise	Adherence to approved work hours and noise levels.	Daily	
	Sound pressure levels from mobile and fixed plant items including vehicles.	As needed	
Air Quality	Direct observation of surrounding vegetation for dust layer. Visible dust in air. Visual exhaust from machinery, Observation of odours	Weekly	No dust, odours or exhaust pollutants
Waste	Effectiveness and appropriateness of waste management and disposal. Effectiveness of chemical bunds. Waste amount, type and proposed disposal locations	Weekly	Legislative requirements
Hazard / Risk	Appropriate storage and use of hazardous materials (appropriate housekeeping)	Weekly	Legislative requirements
Traffic / Access	Effectiveness of temporary traffic control measures.	Weekly	Correct traffic movements
	Adherence to approved transport hours and routes	Weekly	Traffic Management Plan

4 Roles and Responsibilities

All Premier Metals key team members shall ensure that the environmental objectives of the site Management Plan are implemented. The responsibilities of the key Premier Metals team members and other key personnel are summarised in Table below.

4.1 Personnels Responsibilities

The general responsibilities for the key operational personnel are described in Table 6.

General Site Management Responsibilities

Role	Responsibility
Management and Operation Manager	<p>Ensure works proceed with all necessary environmental approvals / permits.</p> <p>Ensure all personnel receive environmental inductions and training.</p> <p>Ensure that all site personnel and subcontractors are aware of their responsibilities.</p> <p>Ensure personnel assigned to perform environmental tasks are competent to do so or are under the direct control of a competent person.</p> <p>Monitor overall environmental management performance.</p> <p>Ensure effective environmental communication occurs in accordance with the SMP</p> <p>Ensure all staff and subcontractors comply with the SMP</p> <p>Manage installation of appropriate environmental controls.</p> <p>Stop work and/or otherwise mitigate the effects of an activity that may cause unexpected environmental harm.</p> <p>Review and acknowledge periodic environmental inspection reports.</p> <p>Maintain records of environmental induction for contractors and subcontractors.</p> <p>Manage environmental monitoring program on regular basis.</p>
General Manager	<p>Ensure that any changes to the schedule of works are communicated to the in a timely manner.</p> <p>Report all environmental incidents to regulation Authority</p> <p>Action an appropriate response in accordance with company procedure in the event of an environmental incident.</p> <p>Inspect and monitor environmental compliance on regular basis and provide feedback of the regular environmental inspections</p> <p>Aspect and Impacts reviewed and updated during the operation</p> <p>Manage environmental monitoring program on a regular basis</p>
Environmental Officer	<p>Prepare and review SMP periodically</p> <p>Ensure the Company commitment to the environmental management of works</p> <p>Confirm that all necessary environmental controls are implemented and maintained for the duration of the operation,</p> <p>Provide regular environmental progress reports to the Operation Manager.</p> <p>Attend site on a periodic basis, monitor environmental compliance and supervise high-risk environmental activities when appropriate.</p> <p>Can be contacted when required or if unavailable has delegated authority.</p> <p>Facilitate the environmental induction and training of employees and subcontractors.</p> <p>Complete and maintain all necessary environmental documentation for the contract, if appropriate.</p> <p>Report all environmental incidents immediately and investigate. Facilitate corrective action as appropriate. Ensure complaints and near misses are dealt with appropriately.</p>

Aspect and Impacts reviewed and updated during the whole operation

Manage environmental monitoring program on regular basis

Employees and Subcontractors

Adhere to the directives of this Site Management Plan.

Act in an environmentally responsible manner.

Report incidents to their supervisors immediately.

Satisfactorily perform all environmental works as specified by contractual arrangement or recognised authority.

Participate in subsequent investigations and implementation or preventive action(s) as required.

Attend all required environmental awareness, induction, and training sessions.

5 Projects Management

5.1 Project Description

Premier Metals is Proposing to install a shredder plant at 87 Kelvin Road Maddington WA 6109, which process light and heavy metal to a specified grade, using the general process described below.

- Pre-sorted metal products are fed along a conveyor belt into a shredder ('hammer mill'), which pulverises the material.
- During the shredding process, an air blower removes light materials such as paper and fabric.
- Steam is employed during the shredding process to reduce oxygen levels around the hammer mill and so minimise the risk of fire, explosion, and odours.
- Shredded material is then fed over an eddy-current generator, which separates non-ferrous scrap (for example, aluminium, copper, brass), and a magnet to remove ferrous scrap.
- Foam, fabrics, rubber, and other textiles are removed, resulting in a material known as 'shredder floc', which is disposed of as lined-landfill waste.
- The shredded metals may be further sorted by hand prior to being deposited in a stockpile for on-sale.

Typically, three main classes of products are produced as the result of shredder facility operation. These include:

Ferrous metals (for example, steel)	approximately 80% by weight
Non-ferrous metals (for example, copper, aluminium, batteries)	approximately 3% by weight
waste products (floc)	approximately 17% by weight.

The key characteristics of the project are detailed in Table 1.

Table 1: Project Details

Project Component	Description
Plant Type	Metal Recycling Shredder
Location	87 Kelvin Road Maddington WA 6109
Make	Bonfiglioli Drake 16 HP
Model	Mobile Drake 2000-16
Zoned	General Industrial
Project Working hours	Mon-Fri 7am to 5pm; Sat 7am to 1pm Sunday Closed
Project Commencement	Upon Approval

5.2 Environmental Settings

The proposed shredder plant could cause range of risks to the environment due to the nature of materials received on site and the activities associated with their operation.

Figure 1: Aerial Photograph of Site



6.0 PERFORMANCE REVIEW

An annual review of performance of this management plan is to coincide with the review process of the Site Management Plan (SMP). The Quality, Health and Safety and Environmental policies have been defined, along with other pertinent business policies, our policies are reviewed annually during the management review meetings or when an internal or external influence requires it. Policies are only updated when deemed necessary following review.

The review process is to assess performance against objectives of this plan and the stated actions within the SMP, with any relevant outcomes, supporting information, reports and/or data, discussed within the relevant section of the SMP, and supporting information/reports provided within the appendices.

AMENDMENT REGISTER

Revision	Date	Details of Revision
Version 1	01/03/2020	Site Management Plan Established
Version 2	08/09/2023	Changes throughout the document.