

# Work Plan

47 Hope Valley Road, Naval Base

Project No: 24-1569

**IN CONFIDENCE**

**Hayes Recycling Pty Ltd**  
30 September 2024



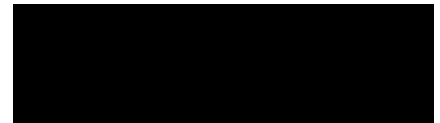


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# 1 Context

Hayes Recycling, a subsidiary of Hayes Metals (the Applicant) purchased Lot 1, 47 Hope Valley Road, Naval Base in April 2024 to establish the first reprocessing facility in Western Australia for subsea flexible and rigid pipes. Up to 65,000 tonnes per annum (tpa)<sup>1</sup> of flexible and rigid pipes will be diverted from landfill and reprocessed into metals and plastics materials for on sale to a combination of Australian foundries and export markets.

A Works Approval application is being submitted under 'Schedule 1 – Prescribed premises' of the Environmental Protection Regulations 1987<sup>2</sup> to the Western Australian Department of Water and Environmental Regulation (DWER). Under Schedule 1, a Works Approval application for the following categories is being applied for:

- Category 47 – Scrap metal recycling: premises (other than premises within category 45) on which metal scrap is fragmented or melted, including premises on which lead acid batteries are reprocessed. 100 tonnes or more per year
- Category 61A - Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land. 1,000 tonnes or more per year
- Category 62: Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use. 500 tonnes or more per year.

## 1.1 Work Plan Scope

Hayes Recycling are establishing their facility at Lot 1, 47 Hope Valley Road, Naval Base (refer Figure 1). To establish the facility, modifications to one of the existing warehouses on site and installation of services are required. This Work Plan details the modifications and service installations to occur to the processing warehouse, including an assessment of possible environmental impacts from these activities and measures to mitigate any impacts.

### 1.1.1 Timeline

Hayes Recycling propose to make modifications to the processing warehouse and install the SURF Rrecycling plant **from September to December 2024**.

The timing of the modifications and installations is so that established supplier contracts from the Western Australian Oil and Gas Sector, for diversion of pipes from landfill and recycling at the Hayes Recycling facility, can commence in early 2025.

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<sup>1</sup> Centre of Decommissioning Australia (CODA, 2023), 'Understanding the opportunity for local disposal and recycling pathways'

<sup>2</sup> Available: [http://www5.austlii.edu.au/au/legis/wa/consol\\_reg/epr1987404/sch1.html](http://www5.austlii.edu.au/au/legis/wa/consol_reg/epr1987404/sch1.html), Accessed: August 2022



Figure 1: Facility location and prescribed Premises boundary

## 2 Modifications and installations

The following modifications and installation activities will be undertaken at the site and location of works are shown on Figure 2.

- Modifications to processing warehouse
  - Install of roller doors (x1) in east facing external wall
  - Cut out (x2) in external (east facing) wall for end points of conveyor to be fitted
  - Modify existing larger roller door at south external wall
  - Install of smaller roller door (x1) at south external wall
  - Additional concrete pads under SURF recycling plant to install points in flooring
  - Installation of temporary generator in southwest corner
- Construction and installation of SURF recycling plant in processing warehouse including:
  - Range of mechanical liberation technologies to remove metals and plastics (details of liberation are commercially sensitive but include stripping, sorting technology, fragmentising, granulation) in the processing warehouse
- Install mechanical fragmentising equipment enclosed in noise / vibration mitigation housing including install of mist system within the hood
- Construction and installation of enclosed picking lines involving cut out of processing warehouse areas and
- Placement mobile equipment
  - Lay moveable compressible drive-over bunding at used pipes storage area
- Placement of mobile storage
  - Sea containers in from south boundary
- Signage / labelling
  - Site work, health and safety (WHS) signage
  - Relevant operational instructions
  - On site traffic flow and speed
  - Mark out of pipes storage bays.

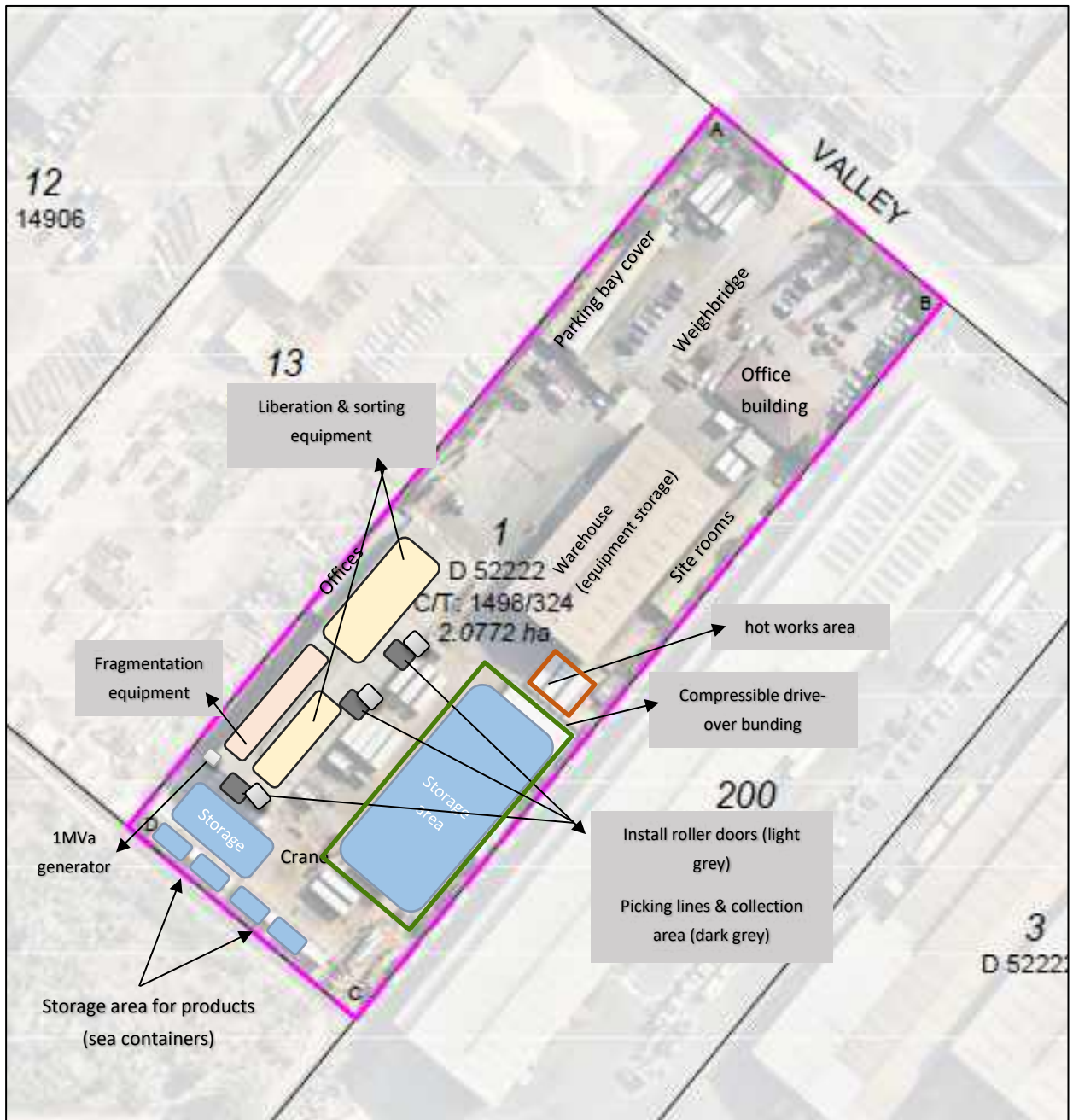


Figure 2: Construction modifications and installations (not to scale)

### 3 Potential emissions assessment

An assessment of potential emissions during the modification of the processing warehouse, construction and positioning of the recycling plant has been conducted (refer Table 1) in relation to potential pathways and receptors (refer Table 2).

Section 4 details the project management and site measures to be put in place to prevent and / or mitigate any potential emissions.

**Table 1: Activities & potential emission points**

| Source of emission                                  | Potential emission | Potential pathway     | Potential receptors                                       | Potential impacts |
|---|--------------------|-----------------------|---|-------------------|
| Modifications to processing warehouse               | Dust               | Air / wind dispersion | Industrial offices & workshops adjacent and opposite site | Amenity           |
|   | Noise              |                       |   |                   |
|   | Waste              | Site                  |   |                   |
| Construction & installation of SURF Recycling Plant | Noise              | Air / wind dispersion |   |                   |
|   | Waste              | Site                  |   |                   |
| Install liberator                                   | Noise              | Air / wind dispersion |   |                   |
| Construction & installation of picking stations     | Dust               | Air / wind dispersion |   |                   |
|   | Noise              |                       |   |                   |

**Table 2: Potential receptors to the site**

| Receptors            | Description  | Proximity to Premises                         |
|----------------------|--|---|
| Sensitive receptors  | No residential communities in proximity to the site.   | Beyond 2 kms radius of the site's boundaries. |
| Industrial receptors | Industrial premises consisting of engineering and asset management businesses, commercial shipping vessel manufacturing and surface coatings manufacturer. | Adjacent and opposite.                        |
| Ecological receptors | Beeliar Regional Park.<br>Long Swamp.  | Within 2 kms radius of the site's boundaries. |



## 4 Potential Emissions Mitigation Measures

Overall project management that will mitigate potential emissions to the site include:

- Short term nature and extent of construction activities
- Prevailing wind direction for the area is in a south westerly direction (away from industrial receptors)
- Site is zoned 'General Industry' and has appropriate planning approvals in place for "resource recovery" by the City of Kwinana
- Construction activities to occur in line with Western Australian Environmental Protection (Noise) Regulations 1997<sup>3</sup> from 7am to 7pm
- Site staff and contractors will be inducted and informed of potential emissions and measures to manage including site specific management plans:
  - Emergency management plan
  - Traffic management plan (refer section 5.1)
  - Fire and Bushfire Management Plan (refer Attachment 8D)
- General site housekeeping activities.

Site specific mitigation measures that will mitigate noise and dust potential emissions:

- Site is landscaped with vegetation surrounding the site boundaries to the north, east and west, with bushland located to the southern boundary
- Enclosed warehouse industrial facilities located adjacent and opposite with site landscaping and activities predominantly occur within enclosed warehouse facilities
- Sealed hardstand in good condition across the entire site
- Limit of 10 kms vehicle movement on site
- Processing facility located in the southwest corner of the site and not directly adjacent to warehouse / buildings on the property west of the facility
- Storage of flexible and rigid pipes (no more than 10m high) will act as a noise barrier to the warehouse / buildings on the property east of the facility.

Modification / installation activities that will mitigate noise, dust and waste potential emissions:

- Recycling plant construction and installation, and associated service / utility requirements to occur in enclosed warehouse processing facility
- Processing facility fitted with roller doors that can be closed during installation of plant and equipment
- Installations of equipment to occur between 7am and 7pm in line with noise regulations
- Site supervisor to monitor (visual / auditory) dust and noise at the boundary of the property on daily basis during construction and installation.

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<sup>3</sup> [WALW - Environmental Protection \(Noise\) Regulations 1997 - Home Page \(legislation.wa.gov.au\)](http://legislation.wa.gov.au)

### 4.1 Traffic site plan

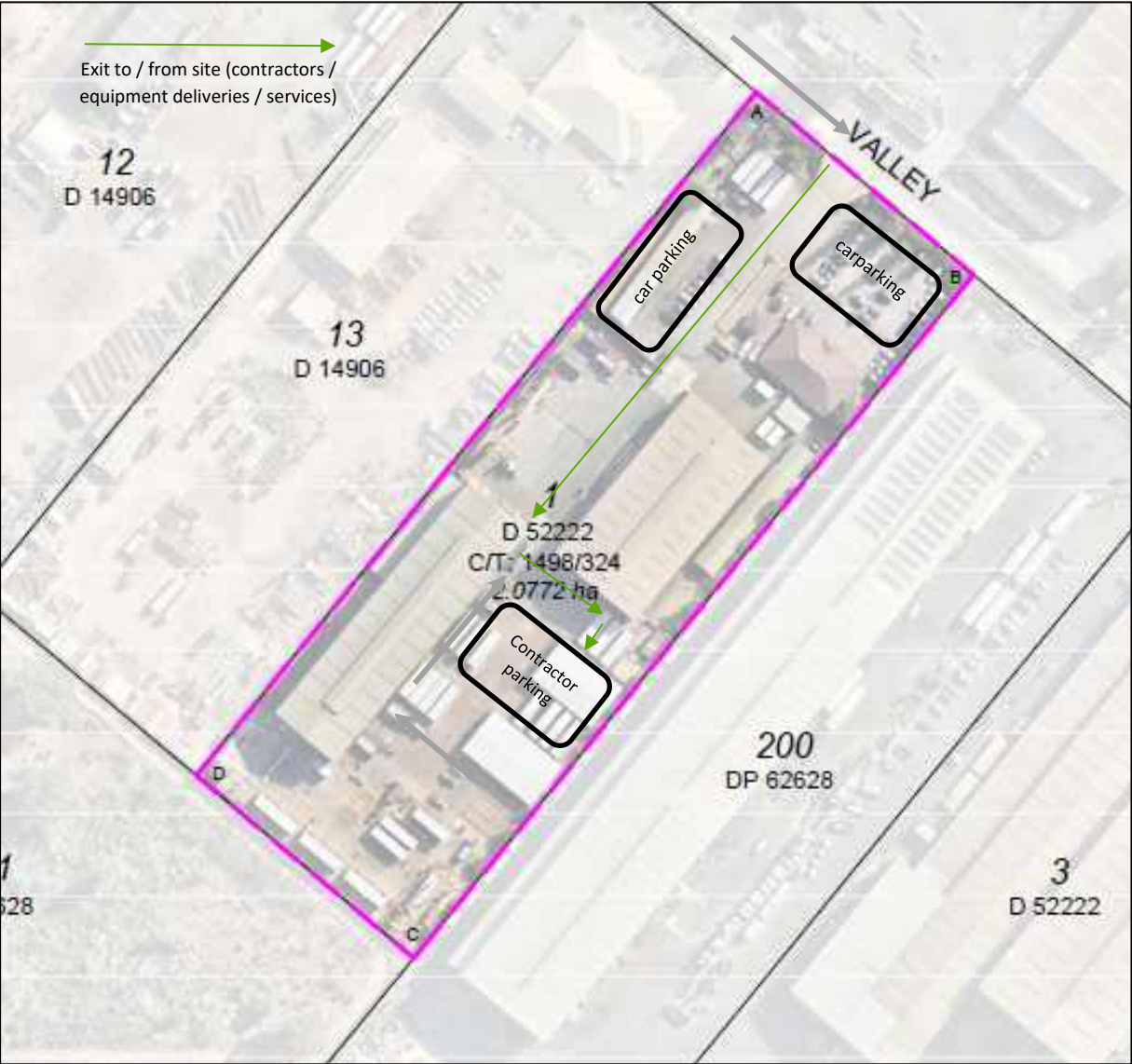


Figure 3: Traffic site plan

## Appendix A

Examples of equipment. Note: Equipment is indicative only and actual equipment installed will differ but be similar to that presented below.

### Picking line



Supplier: Focus Enviro <https://focusenviro.com.au/products/mps48/>

### Bunding



Supplier: Global Spill & Safety <https://globalspill.com.au/product/smart-bund-drive-over-bunding-75mm-sb4x75/>