

Preparation of Operational Environmental Management Plans

VicTrack Property Management guideline

Guideline for third parties who occupy VicTrack land

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1. Purpose

The purpose of this guidance is to outline the minimum requirements for developing a site specific Operational Environmental Management Plan (**OEMP**) for the management principals, controls and actions to prevent harm to people and the environment as a result of tenant operations and activities undertaken on VicTrack land.

This document includes an OEMP template which can be used by a community groups, non-for-profits, small business (those with less than 20 employees) or a sole trader where an OEMP is required, or as agreed by VicTrack.

If you are a tourist and heritage railway operator, please contact VicTrack for provision of the tourist and heritage railway OEMP template.

2. Context

Tenants that conduct or propose to conduct an activity with potential risk of causing pollution or harm to people or the environment on VicTrack land will be required either through their contract agreement with VicTrack or by communication (such as letter from your leasing agent, findings from an assessment or inspection), to prepare an OEMP for their activity.

For example, if you proposed to store chemicals, fuels or other dangerous goods / hazardous materials on VicTrack land, this activity may cause harm from spills or leaks which could pollute the soil, surface water and groundwater. An OEMP would be requested by VicTrack as a way for you to document your risk assessment and controls for your activities to prevent harm to people and the environment.

This guidance document outlines VicTrack's minimum requirements for developing an OEMP for the management of your risks to the environment associated with your operations on VicTrack land and provides information on:

- Specific responsibilities and obligations of relevant parties in administering an OEMP
- A framework for assessment of the environmental risk of your operations carried out at the site
- General management principles and measures to protect the environment during operations
- Notification protocols for environmental incidents and identified contamination
- A process to review an OEMP and update it as required to ensure risks to the environment are managed adequately over time

The OEMP can be prepared by you, or you can engage an environmental consultant to prepare this on your behalf. If you are a small business, community group, sole trader or non-for-profit, or as agreed with VicTrack, you can choose to use the OEMP template provided in Attachment E.

Any additional Environmental Management Plans required to be prepared for an activity (in addition to the requested operational OEMP), for example a Construction Environmental Management Plan prepared by contractors completing a distinct phase of construction works on the site, may refer to the information detailed in this document for guidance. This document and the site specific OEMP to be prepared does not preclude the conduct of any additional environmental management measures not specifically mentioned.

This document does not specifically include Occupational Health and Safety (OH&S) Regulation requirements that must be complied with. OH&S risks and controls may be required to be documented via the development of a site specific OH&S Plan for your site.

2.1. Legal context

If you undertake an activity with the potential to cause harm to people or the environment, you are required by law¹ to take proactive steps to understand and manage those risks as far as reasonably practical, and:

- Assess your risks and identify ways to eliminate and reduce those risks
- Implement controls and actions to reduce the risk of harm from your activities to people and the environment from pollution or waste, including elimination or reducing hazards associated with the storage and handling of chemicals (dangerous goods and/or hazardous substances)
- Consult and provide information to your staff and contactors on risks, hazards and controls
- Provide training and supervision, including in emergency preparation and response
- Respond if a spill or pollution incident occurs and restore the environment
- Notify the Environment Protection Authority Victoria (EPA) if a pollution event causes or threatens harm to human health or the environment as soon as practical (you also have an obligation to notify VicTrack)
- Minimise risks from potentially contaminated land. If you suspect contamination, there is a duty to manage contamination including investigation to understand risks
- Notify the EPA of certain contamination (refer to the EPA website for guidance on notifiable contamination thresholds)
- Identify and classify industrial waste, then only deposit industrial waste at a lawful place, a location that is authorised and agrees to receive the industrial waste
- Take all reasonable steps to contain priority waste such that it cannot escape, and before disposing to landfill, investigate if the waste can be re-used or recycled. You have a duty to record priority waste details and provide information to the EPA

You can find out more about your duties under the *Environment Protection Act 2017* (Vic) (EP Act) as well as useful guidance documents on ways to comply with the EP Act for certain sectors on the EPA Victoria website: epa.vic.gov.au.

An OEMP can be used as a tool to demonstrate that you can comply with your duties under law, in addition to meeting any contractual obligations with VicTrack.

3. Prepare your OEMP

The OEMP can be prepared by you, or you can engage an environmental consultant to prepare this on your behalf.

When preparing your OEMP, you can either:

- prepare your OEMP document based on the requirements outlined in Section 4, or
- If you are a small business owner (less than 20 employees), community group, sole trader or non-for-profit, or as agreed with VicTrack, you can choose to use the OEMP template provided in Attachment E.

The OEMP is to be submitted to VicTrack for review once complete.

Your lease agreement or written communication from VicTrack/leasing agent may include a timeframe in which you need to prepare your OEMP and provide a copy to VicTrack.

¹ Includes the *Occupational Health and Safety Act 2004* (Vic), *Health and Safety Regulations 2017* (Vic), *Dangerous Goods (Storage and Handling) Regulations 2012* (Vic), and *Environment Protection Act 2017* (Vic)

4. Minimum requirements of your OEMP

Your OEMP is to consider all of the relevant requirements specified in this guideline and detailed below. This can be in a word or PDF document consistent with any of your own document control requirements, and relevant attachments where required.

Description of your operations

Your OEMP needs to adequately describe your site and your activities.

4.1.1. Site details

Relevant site details are required to be listed. The table below provides an example of how such information may be presented and the type of information required.

Table 1. Site Details

Item	Relevant Site Information
Site Address / Railway Lot ID	
Site Area	
Current Site Occupier	
Principal Activity	e.g. car servicing and repairs
Land Use Zoning	
Municipality	
General site condition description	Description of buildings and structures, surface paving

4.1.2. Site activities

The OEMP must include a general description of the site specific operations, activities and any infrastructure that have the potential to adversely affect the environment (including soil, groundwater, air and surface water) or people.

The following table provides typical activities that are commonly encountered on VicTrack land. It is noted, however, that not every activity will apply to all sites. In addition, there may be specific activities not included in the table below that will also need to be included in your OEMP, based on your specific site operations.

Table 2. Typical site activities

Activity	Details to include
Fuel or Chemical Storage	<ul style="list-style-type: none"> • Description of storage type (e.g. above and underground storage tanks, containers, drums and any type of temporary storage) • Description of how spills and leaks are prevented from escaping into the environment • Bunding and secondary containment details for above ground storage, where relevant, and determination if the storage meets the requirements of Australian Standard publication <i>AS1940: The storage and handling of flammable and combustible liquids</i> • Details of any first flush systems, triple interceptor points or oil/water separator systems associated with storage areas, where relevant • Location of fuel and chemical storage area on a site plan as well as description (include detail on how the fuel or chemical is stored e.g. on a sealed surface, undercover, in a dedicated secured area) • Details of fuel or chemical names/ types and volumes stored within a register • Confirmation safety data sheets (SDS) are maintained on site (and are up to date) • A copy of any required environmental permissions as an attachment to the OEMP
Fuel Distribution (Pipework and Dispensers)	<ul style="list-style-type: none"> • Description of fuel distribution locations including dispensers (pumps, etc.) and pipework • A plan of the site attached to the OEMP illustrating fuel distribution pipework and dispensers
Maintenance Activities	<ul style="list-style-type: none"> • Description of all maintenance activities such as vehicle and machinery maintenance, including if activities are undertaken on a sealed or non-sealed surface • Details of chemicals used and wastes produced during maintenance activities • Description of how spills and leaks are prevented from escaping into the environment
Vehicle / Machinery Washing	<ul style="list-style-type: none"> • Description of all vehicle and machinery washing, including locations and frequency • Details of waste water management, e.g. discharge to trade waste, treatment and discharge, interceptors • A copy of any trade waste agreements as an attachment to the OEMP
Waste water / Trade Waste Management	<ul style="list-style-type: none"> • Details of trade waste disposal including sources, locations and volumes • Description of any on site waste water systems, waste water treatment and reclaimed waste water use • A copy of any trade waste agreements as an attachment to the OEMP • A copy of any required environmental permissions as an attachment to the OEMP
Waste Management	<ul style="list-style-type: none"> • Details of wastes produced and handled on site • Details of waste storage, handling and disposal • A copy of any required environmental permissions as an attachment to the OEMP
Soil Management	<ul style="list-style-type: none"> • Details of any soil contained on site, stockpiled, imported or handled • Analytical data for the soil (soil sampling) • A copy of any required environmental permissions as an attachment to the OEMP
Materials storage	<ul style="list-style-type: none"> • Size and description of stored materials., e.g. waste tyre storage, raw materials • A copy of any required environmental permissions as an attachment to the OEMP
Stormwater Management	<ul style="list-style-type: none"> • Description of the stormwater system including locations of inlets and outlets

Activity	Details to include
Emissions to the atmosphere	<ul style="list-style-type: none"> • Description of emissions generated • A copy of any required environmental permissions as an attachment to the OEMP
Operating Hours	<ul style="list-style-type: none"> • Description of operating hours
Site Access	<ul style="list-style-type: none"> • Who has regular access to the site? • Conditions of access (e.g. inductions, signing in)

4.1.3. Site plan

A site plan must be attached to the OEMP. It should identify the various operations at the site and in particular those that represent potential sources of contamination or risk of harm. This may include, but not be limited to, triple interceptors, storage tanks, chemical storage areas, product pipelines, or raw materials handling areas. The site plan should also identify key site features such as buildings, the site boundary and the location of relevant environmental control systems, such as bunding, spill kits and wastewater treatment plant areas.

4.1.4. Environmental site condition

If you have any information on the environmental condition of the site (e.g. contamination within environmental site assessment reports, baseline reports, or biodiversity information within biodiversity reports, cultural heritage information), or information has been disclosed to you in your lease agreement defining pre-existing contamination or biodiversity, the OEMP is to summarise key details.

Where there is known contamination, the OEMP is to describe what contamination is present, the risks, where contamination is located, and reference any provided or prepared management plan for the contamination. If no management plan specific to the contamination exists, the OEMP is to include identification of contamination related hazards, relevant management measures and controls to prevent harm, following the risk management process described in Sections 3.2-3.4 below.

The OEMP should also make note if there are any groundwater monitoring wells that require protection from damage.

Where there is known biodiversity, the OEMP can reference any provided or prepared biodiversity management plan. If no biodiversity management plan exists, the OEMP can outline what biodiversity controls are required, such as not removing or disturbing native vegetation, no go zones, and weed control. Similar information applies to cultural heritage values.

You must disclose information in your OEMP and provide adequate information on environmental conditions and risks to relevant staff and contractors working on your site.

4.2. Environmental risk management

An assessment of environmental risks posed by your operations at the site and associated potential sources of impact to the environment and people is necessary. This involves understanding, preventing and controlling hazards on your site that could cause harm to people or the environment.

Your approach to managing risk will depend on the scale of your activities and how complex they are. It will also depend on the kinds of risks you need to manage.

The EPA has prepared *Publication 1695.1 Assessing and controlling risk: a guide for business*, available from the EPA Victoria website (epa.vic.gov.au), that outlines the risk management framework that can be applied to help prevent harm to human health and the environment. The EPA outlines a four-step risk management process:

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1. Identify the hazards
2. Assess risks
3. Implement controls
4. Check controls

These steps are discussed in Sections 3.3-3.4 and Section 3.11 below.

4.3. Identify the hazards

You need to identify all hazards on your site that could harm human health or the environment, by considering the following:

- Completing a site walk over and documenting potential sources of pollution
- Preparing and reviewing a list of the site infrastructure and operations
- Document the storage and use of chemicals, fuels, oils and raw materials
- Reviewing how you handle materials, including any operating procedures
- Noting the specific types of storage, such as above / underground tanks and drums
- Quality and capacity of storage and bunding / secondary containment
- Known spills and leaks that have occurred
- Reviewing waste management (what is generated, what is received, how is it stored and treated, waste water, trade waste, soil and general waste)
- Dust, odours and emissions generated

All identified hazards must be documented in the OEMP.

An example checklist is provided in **Appendix B** to assist you with the process of identifying hazards, as well as understanding the nature of potential risks to the environment, discussed further in Section 3.3.1.

4.3.1. Assess the risks

To assess the risks from the hazards you identified, you need to look at how the hazards might cause harm, how likely they are to happen and how severe the harm may be, known as likelihood and consequence.

To determine the likelihood of the harm happening, consider if there have already been any instances of pollution such as spills, the response, what controls are currently in place and the frequency of the hazard (does it exist all the time or only sometimes). Then consider the consequence if harm were to occur, this could also be to local or adjacent areas such as creeks, houses, or schools.

The likelihood and consequence information gathered as part of this risk assessment process can be used to develop a risk matrix which can help inform the management and monitoring needs that must be documented in the OEMP. Prioritising the risks (risk ranking) will help target the level of management actions required and determine what monitoring efforts are required. In general terms the higher risks will require the most active management and monitoring.

Further information on assessing the risk as well as an example risk ranking template is provided in **Appendix A**.

In addition to helping identify hazards, the example checklist provided in **Appendix B** can assist understanding the nature of potential risks to the environment.

Depending on the size of your operations, only parts of the checklist may be relevant.

A relatively low risk tenant activity may only require a descriptive list to identify potential sources of impact and consequences, e.g.:

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- Sources of risk – e.g. carwash, minor volumes of chemical storage
- Consequences – e.g. run-off to stormwater, spillage to ground, inappropriate waste management

If your operations are relatively low risk or have only a few sources of risk, your operations may not require prioritising and can be readily managed with standard environmental controls.

A larger site with more complex operations should undertake a risk management approach consistent with AS/NZS ISO 31000:2018, Risk management –Guidelines (Standard Australia/Standards New Zealand).

4.4. Identify and implement controls

You must put in place controls to prevent your activities from posing a risk to human health and the environment.

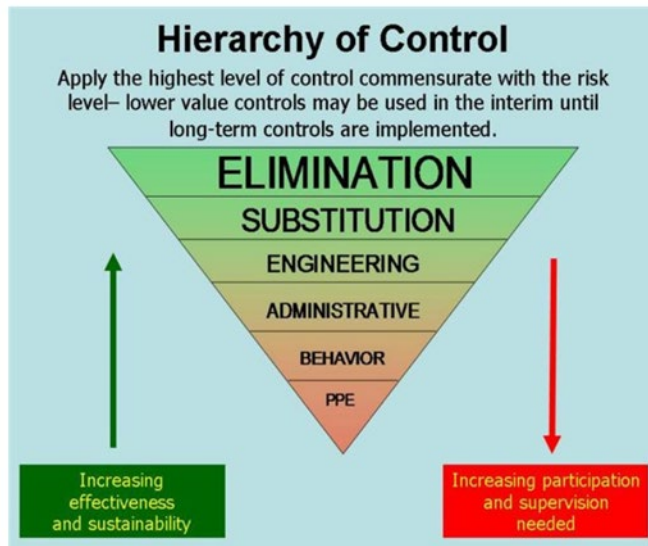
4.4.1. Hierarchy of control

Consider the nature of your site activities and look at ways to eliminate the risk.

There is a hierarchy of risk control to look at possible means to reduce risk from your operations; elimination of the hazards is the most effective control, followed by a substitution of the hazard with something safer.

There may be relatively easy means of reducing the risk to acceptable levels by considering elimination or engineering control measures (e.g. the design of infrastructure to minimise release to the environment) and administrative controls (e.g. training of personnel).

The hierarchy of risk control is presented in the figure below:



4.4.2. Environmental management procedures and controls

The OEMP must include the detail of environmental management procedures and controls to be implemented to prevent harm to people and the environment based on the assessment of risk and the requirements of legislation, regulations and guidelines (refer to Section 4).

The table below provides a number of suggested headings for each hazard type but are not intended to be a comprehensive list applicable to all sites. Environmental management measures must be adopted specific to the site/activity.

Table 3. Common Environmental Procedures for hazards


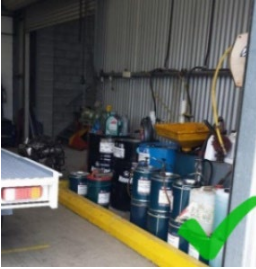

Example Procedures		
Fuel Storage (underground)	Fuel storage (above ground)	Waste Water / Trade Waste Management
Chemical Storage	Dust Management	Waste Storage
Liquid Storage	Waste Management	Spill Management
Stormwater Management	Waste Register	Incident Management and Notification
Contamination (soil or groundwater)	Asbestos	Noise
Septic tanks / onsite waste water management systems		

Examples of common risk control are:

- Wastewater Management from a car/truck wash facility – if not properly managed has the potential to contaminate land, groundwater or surface water. Consideration to be given to appropriate design to cope with the size of the vehicles requiring cleaning (i.e. sizing to ensure adequate paving) and separation of oily water from sediment laden water, maintenance to ensure serviceability (e.g. regular clean out of sediment and triple interceptor traps).
- Contaminated soil – has the potential to harm people and the environment. Consideration to be given to preventing contact with contamination. Examples of controls for contamination may include maintaining barrier layers on site, washing hands after handling potentially contaminated soils, wearing gloves, using extractive fans for trenches if sub surface works are completed.
- Septic tanks- if not properly maintained, can overflow or leak into the surrounding environment. Septic tanks must be maintained, inspected annually and pumped regularly. Maintenance records (including pump-out, service or replacement records) must be kept for a minimum of 5 years and a copy of the records provided to the landlord, VicTrack.
- Chemical storage - that has the potential to contaminate land, groundwater or surface water. Consideration should be given to how the material is stored (e.g. undercover, in a bunded area), what are the spill protection methods (e.g. use of permanent paving and bunding, product transfer infrastructure design), and details of procedures to be followed in the case of a release to the environment.

Further information on good practice for management of liquid chemicals and fuels based on size stored is found below.


Table 4. Storage and Use Controls for Fuels and Chemicals based on Storage Size.

Chemical Storage Size	Storage Container	Controls	Example of Best Practice
< 220 L	Within small containers such as jerry cans.	<ul style="list-style-type: none"> • Containers are in good condition, with intact lids, no rust or holes or signs of leakage. • Contents of each small container (such as jerry cans) are clearly labelled. • Containers are kept within secondary containment (such as within a dangerous goods cabinet, on a bunded pallet or within a sealed bunded area). • The capacity of the secondary containment is at least 25% of the total volume stored in small containers. • Storage areas are located on solid impervious ground, such as concrete or bitumen which is free from cracks and other defects. • Storage areas are located well away from surface water drainage lines, creeks, ponds (etc.) or bare ground, to minimise potential pollution from spills or leaks. • Incompatible dangerous goods are stored separately and have separate bunds. • Safety Data Sheets (SDS) are provided at the point of use and/or in a central location readily accessible. • SDS are no more than 5 years old. • Fully stocked and appropriately sized spill-kit is provided in the vicinity of the storage area. • Regular inspections are conducted to ensure the controls are in use and effective, and any spills have been cleaned up, including spills inside the bund. 	 
> 220 L - <1000L	Within drums and other larger sized containers.	<ul style="list-style-type: none"> • Drums are in good condition, with intact lids, no rust or holes or signs of leakage. • Contents of each drum and container are clearly labelled. • Drums are stored within a dedicated sealed and bunded area, or on pallet bunds (see image). Storage locations are covered to prevent rain ingress. • The capacity of the secondary containment is at least one drum 	



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Chemical Storage Size	Storage Container	Controls	Example of Best Practice
		<p>(205L), or 25% of the total volume stored in drums and small containers – whichever is the greater.</p> <ul style="list-style-type: none">• Any open drums (e.g. for waste oil collection) are stored on a bund and ideally always under cover. Alternatively, regular visual checks are in place to monitor and remove rainwater from bunds.• Drum storage areas are located on solid impervious ground, such as concrete or bitumen which is free from cracks and other defects.• Drum storage areas are located well away from surface water drainage lines, creeks, ponds (etc.) or bare ground, to minimise potential pollution from spills or leaks• Incompatible dangerous goods are stored separately and have separate bunds.• Fully stocked and appropriately sized spill-kit is provided in the vicinity of the storage area.• Where pumps and spears are used to decant/use the drum contents, the pump, spear and pipework are in good condition with no leaks.• Safety Data Sheets (SDS) are provided at the point of use and/or in a central location readily accessible.• SDS are no more than 5 years old.• If drums are stacked, additional controls are put in place to prevent drums falling outside the bund and to contain leaks from elevated drums.• Regular inspections are conducted to ensure the controls are in use and effective, and any spills have been cleaned up, including spills inside the bund.	

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Chemical Storage Size	Storage Container	Controls	Example of Best Practice
≥ 1000 L	Within IBCs or other bulk storage tanks. This includes wastes, fuels, oils and chemicals.	<ul style="list-style-type: none">• IBCs are in good condition, with no evidence of leaks.• IBCs are clearly labelled with the contents.• IBCs are stored within a dedicated sealed and bunded area, or on pallet bunds (see image). Storage locations are covered to prevent rain ingress.• The capacity of the secondary containment is at least one IBC (1000L), or 25% of the total volume stored in the bund – whichever is the greater.• IBC storage areas are located on solid impervious ground, such as concrete or bitumen which is free from cracks and other defects.• IBC storage areas are located well away from surface water drainage lines, creeks, ponds (etc.) or bare ground, to minimise potential pollution from spills or leaks• Fully stocked and appropriately sized spill-kit is provided in the vicinity of the storage area.• Incompatible dangerous goods are stored separately and have separate bunds.• When decanting from IBCs into smaller containers, a nozzle and drip trays are used to capture any spilled substances (see image for best practice example).• Bulk container pumps are provided with drip control underneath to capture any spills.• Where pumps and spears are used to decant/use the IBC contents, the pump, spear and pipework are in good condition with no leaks.• Safety Data Sheets (SDS) are provided at the point of use and/or in a central location readily accessible.• SDS are no more than 5 years old.• If IBCs are stacked, additional controls are put in place to prevent IBCs falling outside the bund and to contain leaks from elevated IBCs.• Regular inspections are conducted to ensure the controls are in use and effective, and any spills have been	

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Chemical Storage Size	Storage Container	Controls	Example of Best Practice
		cleaned up, including spills inside the bund.	
>5,000L	Above ground storage tank (AST)	<ul style="list-style-type: none"> • ASTs are in good condition, with no evidence of leaks. • AST installations are clearly labelled with the contents and any dangerous goods placarding. • ASTs are located within a bund OR the tank is fully self-bunded. • Storage locations are covered to prevent rain ingress to the bund OR Procedures are in place to regularly inspect, test and dispose of collected rainwater to maintain the full bund volume. • The AST bund capacity is 110% of the largest tank volume (taking into account any volume displaced by placement of the tank in the bund), with additional 10% freeboard. • ASTs are protected from accidental impacts. • ASTs are located on solid impervious ground which is free from cracks and other defects. • ASTs are located well away from surface water drainage lines, creeks, ponds (etc.) or bare ground, to minimise potential pollution from spills or leaks. • Fully stocked and appropriately sized spill-kit is provided at the storage area. • Incompatible dangerous goods are stored separately and have separate bunds. • Safety Data Sheets (SDS) are provided at the point of use and/or in a central location readily accessible. • SDS are no more than 5 years old. • ASTs are subject to periodic inspection by a licensed engineer to assess for corrosion and that fittings are tight. • Pumps and hose connections for filling bulk tanks are located within a bund and designed to shut-off flow in the event that a breach occurs. • Regular inspections are conducted to ensure the controls are in use and effective, and any spills have been cleaned up, including spills inside the bund. 	 <p style="text-align: center;">Example of self-bunded AST</p>  <p style="text-align: center;">Example of secondary containment around AST</p>

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Chemical Storage Size	Storage Container	Controls	Example of Best Practice
Refuelling		<ul style="list-style-type: none"> • Mobile tanker trucks used on site, including trailer mounted tanks, are fully self-bunded (e.g., there is a tank within a tank). • Fuel bowsers are fitted with trigger nozzles with automatic cut-off. • An appropriately sized and fully stocked spill kit is located next to fixed refuelling locations and on mobile tanker trucks. • Personnel performing refuelling have been trained in spill response (refer to the procedure attached in Appendix I). • Refuelling is conducted over sealed ground where possible, and well away from waterways and drainage lines. • A drip tray is used to capture minor drips and leaks during refuelling. • Regular inspection of the bowser, nozzle and related equipment for visible signs of degradation. • Annual maintenance of equipment to limit the likelihood of faulty equipment resulting in a spill. • Waste fuel must be collected and disposed of 	
<u>>5,000L</u>	Underground storage tank	<ul style="list-style-type: none"> • Implement all requirements in <i>EPA Guideline 888.4</i>, including a documented UPSS management system. • Implementation of a leak detection system for tank and pipework that is verified to detect a leak of at least 18 L/day and reports monthly minimum (refer to Section 4 of <i>EPA Guideline 888.4</i>). • Annual tank and piping integrity testing, with all records of testing kept. • Annual servicing by a suitably qualified technician of all leak detection equipment (e.g. mechanical line leak detectors, electronic line leak detectors, sensors etc.) and of any cathodic protection systems. • Pumps and hose connections for filling bulk tanks are designed to shut-off flow in the event that a breach occurs. 	

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Chemical Storage Size	Storage Container	Controls	Example of Best Practice
		<ul style="list-style-type: none">• Cathodic protection where ground conditions are potentially corrosive to the tank or piping materials.• Installation and monitoring of groundwater monitoring bores at sensitive sites and validation of the leak detection system by a competent person.• Any new UST installation meets the full requirements of <i>EPA Guideline 888</i>.	

Table 5 below describes the disposal requirements of a number of commonly occurring waste types and the controls to minimise risks. All waste must be segregated, with sufficient separation between different types. This ensures no mixing or cross-contamination of waste types which results in improper disposal.

Table 5. Common Waste Types and their Disposal and Storage Requirements.

Waste Type	Waste Codes	Waste Classification	Controls and Disposal Requirements
<p>Oils</p> <p>Used Absorbent Materials</p>	<p>J100 – Waste oils, hydrocarbons, emulsions and transformer fluids excluding poly-chlorinated biphenyls.</p> <p>J120 - Waste oil/water, hydrocarbons/ water mixtures or emulsions.</p> <p>J130 - Triple interceptor waste and stormwater contaminated with oil or hydrocarbon</p> <p>J160 - Waste tarry residues arising from refining, distillation, and any pyrolytic treatment.</p> <p>J170 – Used oil filters.</p> <p>N250 – Absorbents contaminated with residues of hazardous substances</p>	<p>Reportable Priority Waste</p>	<ul style="list-style-type: none"> Storage of waste oils, kerosene, coolants, oil filters used absorbents and other hazardous substances are collected and stored in primary containment (such as Jerry Cans, Drums, IBCs or a dedicated wheelie bin for used absorbents). Refer to Table 5-1 for the appropriate storage requirements relative to the container type. Volumes are kept onsite to practicable minimum. Waste oils are located away from waterways and drains, with sufficient secondary containment to capture any potential spills. As waste oils and oily liquids are classed as a reportable priority waste, all transportation and disposal is tracked through EPA’s online waste tracker tool. Verification that waste transporters have the relevant permission occurs before waste is disposed of offsite.
<p>Batteries</p>	<p>D150 – Cadmium and cadmium compounds</p> <p>D220 - Lead and lead based compounds</p> <p>T300 – E-waste</p>	<p>Reportable Priority Waste (D150 and D220)</p> <p>Priority Waste (T300)</p>	<ul style="list-style-type: none"> Wet batteries are stored undercover on a sealed surface and away from ignition sources to prevent harmful chemicals or materials from being discharged to land or stormwater. Storage to prevent damage or short-circuit – i.e. not stacked, or cardboard / spill tray used between layers. An accessible emergency spill kit is located nearby the storage area, with all personnel properly trained in the general spill response procedure. Volumes are kept onsite to a practicable minimum.
<p>Scrap Metal</p>	<p>Z300 – Steel.</p> <p>Z310 – Aluminium.</p> <p>Z320 – Non-ferrous metals, other than Aluminium.</p>	<p>Industrial Waste</p>	<ul style="list-style-type: none"> Stores of scrap metals which are free from visible signs of contamination (e.g. visible staining or odours) are kept neat and orderly. Scrap metal containing residual oils and other forms of contamination are stored undercover, with sufficient secondary containment to capture any potential leaks or runoff.

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Waste Type	Waste Codes	Waste Classification	Controls and Disposal Requirements
General Rubbish and Recyclable Wastes	-	-	<ul style="list-style-type: none"> General rubbish is stored and regularly disposed of in accordance with relevant local law. Rubbish is stored in covered bins or skips, with good housekeeping to ensure they are not overflowing. Rubbish streams are separated into separate bins (i.e. rubbish, recycling, green waste) to maximise waste recovery. Regular inspections and litter collections from site external areas.
Bund Water / Spill Clean Up	Dependent on material	Dependent on material	<ul style="list-style-type: none"> Regular inspection of bunds (including pallet bunds, inside dangerous goods cabinets and bulk bunds) for accumulated liquid. Prompt removal and containment of accumulated bund water (e.g. pump into an IBC), pending testing and off-site disposal. Any containers with contaminated bund water awaiting disposal are stored as per fuels/chemicals controls.
Soil	Dependent on Laboratory Testing	Category A, B, C or D Soil – Reportable Priority Waste Fill Material – Industrial Waste	<ul style="list-style-type: none"> Long-term soil stockpiles have approval from the landowner / VicTrack to store onsite. 'Potentially contaminated' or confirmed contaminated soils are managed in accordance with the procedure set out in Section 5.3. Volumes of soil are kept onsite to practicable minimum. Prior to disposal, samples of the soil undergo laboratory analysis against relevant analytes detailed in EPA Publication 1828.2. Depending on the results, soils are either classified as Category A, B, C or D waste or as fill material. This classification determines where this waste can be accepted. If soil is classed as fill material, it is an industrial waste and its' disposal is not tracked using the EPA online waste tracker portal. Fill material is disposed of at a 'lawful place' i.e. municipal landfill. Category A, B, C or D soils are all reportable priority waste. As such, their disposal is tracked through the EPA online waste tracker portal. Verification occurs to confirm the transporter of the waste has the relevant permission, and that the soil is disposed of at a location licenced to accept it.
Used Chemical Containers (containing residual liquids)	<p>N100 - Rigid steel or plastic containers with an original volume less than 200 litres contaminated with reportable priority waste (transport).</p> <p>N105 - Rigid steel or plastic containers with an original volume equal to or greater than 200 litres contaminated with reportable priority waste (transport).</p>	Reportable Priority Waste	<ul style="list-style-type: none"> Containers are kept within secondary containment (such as in a bunded cabinet, or on a bunded pallet or within a sealed bunded area). Storage areas are located undercover and on solid impervious ground, such as concrete or bitumen which is free from cracks and other defects. Storage areas are located well away from surface water drainage lines, creeks, ponds (etc.) or bare ground, to minimise potential pollution from spills or leaks. Fully stocked and appropriately sized spill-kit is provided in the vicinity of the storage area. Regular inspections are conducted to ensure the controls are in use and effective, and any spills have been cleaned up, including spills inside the bund. Do not wash containers out to remove any residues unless the site contains a dedicated facility to capture all wash waters with discharge to trade waste or liquid waste contractor. Spent steel and rigid containers larger than 200L (i.e. drums, IBCs) are required to be sent for reuse or recycling. Chemical containers are to be disposed of, or recycled through a licenced contractor.

4.5. Contingency plans

4.5.1. Site emergency plan management

The OEMP must include appropriate information regarding an emergency plan and incident management. In the context of the OEMP, an environmental emergency or incident is any event that can cause or has the potential to cause material harm to the environment or human health. You have a duty under the *Environment Protection Act 2017* (Vic) to respond to harm by taking steps to clean and restore the environment if pollution occurs.

The OEMP may refer to more detailed emergency or incident management procedures that have been developed for the site. An emergency plan must include the following as a minimum:

- Contact details for staff who have the availability and authority to act during an environmental emergency
- Response personnel responsibilities
- Contact details for emergency services as well as the EPA (1300 372 842) and VicTrack (03 9619 1111), and your leasing agent (where relevant)
- The location, types and amounts of hazardous material being stored and used on site
- Steps and controls to minimise harm to the environment
- Instructions and details for notifying relevant government agencies and, if necessary, neighbours
- Notification of environmental incidents (refer to Section 4.5.3 below for more information)
- Incident reporting

4.5.2. Spill management

Spills are expected to be the most common item that will require emergency management. Management must include the following as a minimum:

- Having available appropriate and well maintained spill kits near areas where spills are likely to occur, e.g. near fuel and liquid storage. Spill kits are commercially available and commonly include absorbent materials
- Appropriate training of personnel who will need to use spill kits. The locations, contents and use of spill kits must be documented in the OEMP
- Where potentially large quantities may be involved, a spill response may include use of educator trucks to retrieve spilled material
- Sampling may be required through the engagement of a suitably qualified environmental consultant to assess the extent of impact to the environment (soil, groundwater and/or surface water) and where necessary impacted material may need to be excavated, treated and/or disposed.
- Preparing an incident report and reviewing site practices for areas of improvement

4.5.3. Notification of pollution

If an environmental incident or pollution event happens on VicTrack land, or has the potential to impact VicTrack land, you must notify VicTrack within 24hrs, or as soon as reasonably practical.

If a pollution event causes or threatens harm to human health or the environment, you are required under the *Environment Protection Act 2017* (Vic) to contact the EPA, as soon as practical.

Your OEMP is to include the relevant process for a notification of a pollution incident, and who is responsible for contacting the EPA and VicTrack. Your OEMP is to include the contact details for

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your leasing agent / VicTrack representative, EPA and WorkSafe. The EPA can be contacted on 1300 372 842.

4.5.4. Unexpected Finds

The potential for unexpected contamination or wastes to be encountered should be included in the OEMP. An unexpected find of possible contamination may include stained material, soil or water with a visible sheen, odorous material, buried waste or suspected asbestos.

In such an event, stop work, make the area safe and secure, then contact VicTrack. You may need to engage an environmental professional to assess the risks associated with the unexpected contamination or hazardous materials.

4.5.5. Notification of contamination

The *Environment Protection Act 2017* (Vic) requires certain types of contamination to be notified to the EPA by the person in management or control of the land, called notifiable contamination. Under the *Environment Protection Act 2017* (Vic), you have a duty to notify EPA as soon as you become aware or ought to have been aware of notifiable contamination.

The thresholds and descriptions of notifiable contamination are defined in Part 2.1 of the *Environment Protection Regulations 2021* (Vic) and include the following areas that may be notifiable:

- Soil contamination, including if it has moved or is likely to move onto adjacent land
- Friable asbestos in or on soil
- Actual or likely contamination of groundwater or surface water that is being used or may be used
- Presence of any non-aqueous phase liquid in soil, surface water or groundwater
- Soil vapour contamination above certain thresholds
- On site retention of soil (other than fill material) from contaminated land sourced on-site that is not an activity for which an environmental permission is required

Please refer to the *Environment Protection Regulations 2021* (Vic) and EPA for further information and a complete description of notifiable contamination.

Where notifiable contamination is present:

- If the contamination is agreed to be pre-existing to your occupation of VicTrack land, VicTrack will notify the EPA that the land is contaminated
- Where the contamination has been caused or contributed to by you or your organisation (or your predecessor, including by assignment), you must first inform VicTrack of that contamination, and then you will be required to notify the EPA that the land is contaminated. Your OEMP should consider including a process for notification.

Further details surrounding notifications for contamination can be found in *EPA Publication 2008.1 Notifiable contamination guideline: Duty to notify of contaminated land*, found on EPA's website.

4.6. Environmental permissions

Under the *Environment Protection Act 2017* (Vic), an activity that may present a risk to human health or the environment and where assurance is needed that the risks from the activity are being effectively managed, must be regulated by EPA by obtaining a permission for that activity.

There are three types of permissions:

- Licences are used for high-risk or high complex activities. There are development licences, operating licences, and pilot project licences

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- Permits are for medium-risk activities
- Registrations are used for low-risk activities

Prescribed activities that need an environmental permission are outlined in Schedule 1 *Prescribed permission activities and fees* (refer to column 3) of the *Environmental Protection Regulations, 2021* (Vic). Some examples (but not a complete list) include:

Table 6. Example prescribed activities requiring a permission

Example of prescribed activities that require a permission		
Receiving, storing, or processing waste generated at another site	Immobilising, thermally degrading or incinerating waste	Reportable priority waste management: Storing, treating, reprocessing, containing or disposing any reportable priority waste generated at another site
On site wastewater management systems e.g. septic systems (note this is a permit activity that is administered by your local council, not the EPA)	Sewage treatment: Treating, discharging or depositing sewage exceeding a design or actual flow rate of 5000 litres per day	Disposing septic tank sludge or sewage treatment plant sludge to land
Supplying or using reclaimed wastewater	Supplying or using biosolids	Waste receiving, treatment, processing and waste resource recovery
Supply or use of any waste classified as reportable priority waste	Industrial wastewater treatment: discharging or depositing industrial wastewater generated at another site exceeding a design actual flow rate of 5000 L per day	Bulk storage of petroleum and oil products (and other compounds of carbon) in tanks exceeding 10,000L capacity and a total design capacity of 1 megalitre
Containment on a project site of Category D waste soil generated at that project site	On site retention of contaminated soil (other than fill material) in a structure designed to contain at least 1000m ³ of the soil and to prevent further contamination	Washing or cleansing bulk transport containers that have contained a reportable priority waste or dangerous good
Temporary (no more than 60 days) non-friable asbestos storage of less than 10m ³ not generated at the site	Temporary on site industrial waste treatment	Waste transporting
Bitumen or asphalt batching	Temporary (<60 days) storage of designated waste (1000 L or less) not generated at the site	Timber preserving works
Commercial dry cleaning	Generating electrical power from the consumption of a fuel at a rated capacity of at least 5 MW of electrical power	Cement works
Tyre waste storage (small (>5m ³) and large scale)	Vehicle assembly or sub assembly with a designed production capacity of at least 2000 units per year	Metal melting, galvanising, or finishing

Example of prescribed activities that require a permission

<p>General discharges or emissions to the atmosphere if:</p> <p>a) at least 100kgs per day of certain compounds or gases; or</p> <p>b) at least 500kgs per day of carbon monoxide; or</p> <p>c) any Class 3 substance</p>	<p>Chemical works: Manufacturing</p> <p>a) products by any chemical process with a designed production capacity of at least 2000 tonnes per year of chemical products; or</p> <p>b) where acrylic compounds, herbicides, insecticides or pesticides are manufactured by any chemical process</p>	<p>Operating outside of hours or extended operations</p>
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There are more activities that require a permission. Please refer to the *Environmental Protection Regulations, 2021 (Vic)* for more information on prescribed permission activities and refer to *EPA Publication 1799.2 Permissions scheme policy* for further information on how each permission type works.

A permission ensures certain standards and conditions are met, and a permission holder must comply with the conditions stipulated in their permission.

If your activity requires a permission from the EPA, a copy of that obtained permission should be included in your OEMP, along with any requirements from the EPA to monitor or control your hazards from your activity.

If you are unsure if your activity needs a permission, you can complete a permission pathway form available on the EPA website.

To operate a new or modify an existing septic tank or wastewater management system, a permit is required from your Local Government Authority/ council.

4.7. Record keeping

Record keeping is an important part of ensuring the requirements of an OEMP are being met. The following are the types of records that, as a minimum, should be maintained and be available for review upon request.

- Regular inspection records, including identified issues and actions (refer to **Appendix C** for an example inspection record)
- Outcomes of any OEMP audits (refer to Section 3.9). This must include records of improvement actions and their implementation that were a result of the OEMP audit
- Reports summarising and discussing results of environmental monitoring data, where relevant. The results should be referenced when reviewing the OEMP and considering actions to improve environmental management
- Annual volumes of trade waste discharged to sewer and associated monitoring data. This information will typically be required by the responsible authority for a trade waste agreement
- Management and tracking of residual solid and liquid wastes that are either industrial or prescribed wastes. Information must include where they have been disposed off-site and the volumes disposed
- Any statutory reports that are required for the site. For example, EPA Annual Performance Statements, National Greenhouse and Energy Reporting documents, National Pollutant Inventory reports requirements to comply with an environmental permission
- Waste tracking, waste disposal or clean out (e.g. triple interceptor pump out) receipts/records
- Septic tank/onsite wastewater management system maintenance records (including pump-out, service or replacement records) for a minimum of 5 years and a copy of the records provided to the landlord, VicTrack

4.8. OEMP training requirements

All employees must undertake training to ensure that they are informed regarding their responsibilities under the OEMP. Employees include contractors who may only work at the site from time to time. The training must ensure that all employees understand their obligations to ensure that the requirements of the OEMP are implemented. OEMP implementation training should include the following:

- Explanation of the objectives of your OEMP
- Familiarisation with the management, procedures and controls to prevent harm to the environment and people from site activities, in particular focusing on the employee's area of work and responsibility
- What to do if there is an environmental incident, who to report it to and how
- Monitoring requirements of the OEMP, where relevant to the employee's area of work and responsibility

Records must be kept to ensure that training is up to date. They must include the following:

- Who was trained and when
- Sign on sheet to confirm training/induction has been completed. It is recommended this be included as an attachment to the OEMP
- The name of the trainer
- A description of the training content, or confirmation training included all relevant requirements of the OEMP

It is expected that needs for training frequency and updating will be based on the outcomes of OEMP auditing and review.

4.9. OEMP auditing

4.9.1. OEMP auditing

A program for periodic auditing of the OEMP is to be developed and outlined to review the implementation and effectiveness of the OEMP. Auditing should assess whether the OEMP is being properly implemented and maintained, if controls put in place are adequate to prevent harm to people and the environment, as well as identify areas of improvement, and if staff are adequately trained. The OEMP must detail the following:

- Staff responsible for carrying out an audit
- The scope and method for an audit. That will commonly refer to a checklist that has been developed specifically for the activities and management measures at the site, and a thorough inspection and interview with staff, where relevant. The audit checklist should be detailed, and an expanded version of the example provided in **Appendix C** (general site inspection)
- Timing and frequency
- Reporting requirements/record keeping
- Follow up for any identified actions or areas of improvement

4.9.1.1. Audit frequency

The frequency of audits must reflect the level of risk posed by potential environmental audits. It should also be based on the outcomes of previous audits (e.g. previous audits may have identified that some activities are not being managed adequately and require more frequent auditing).

At a minimum, it is expected that implementation of the OEMP will be audited once every 12 months. Auditing of record keeping may need to be more frequent (e.g. quarterly).

4.9.2. Improvement actions

The OEMP should define procedures for dealing with non-compliance with environmental management controls, record keeping and training. That includes defining who is responsible and have the authority to investigation and take improvement actions.

The non-compliances and improvement actions must be recorded.

4.9.3. VicTrack assurance

From time to time, VicTrack or a consultant engaged by VicTrack may undertake an assurance assessment of tenanted sites. This will generally involve an inspection and interview with relevant staff. A copy of your OEMP will be requested as well as any other environmental management procedures, reports or permissions you may have. A notification will be provided to you prior to VicTrack or a consultant attending site for this purpose.

4.10. OEMP review

The OEMP must be reviewed regularly to ensure that environmental controls and procedures are still applicable to the activities being carried out, and the OEMP requirements are up to date with the current regulations and standards. This section must define:

- Who is responsible for the review
- When it is to be carried out
- How the reviewed and updated OEMP needs to be approved by relevant staff
- How staff and contractors will be informed of changes to the OEMP
- Provision of updated copies of the OEMP to VicTrack

At a minimum, the OEMP must be reviewed once every 2 years. It must also be reviewed whenever activities at the site are modified to check if the risk assessment and management measures need to be updated, or as legislation changes.

4.11. Check controls

Monitoring of the controls you have put in place to prevent risks is important so you can understand if the controls are working as intended.

4.11.1. Environmental inspection

It is recommended you undertake regular site inspections, to monitor the condition of your site, confirm monitoring requirements are being undertaken and check effectiveness of controls. It is recommended this be undertaken monthly, where possible.

Inspections should be documented and recorded, including any actions required to rectify any issues observed or areas of improvement. An example of a general environmental site inspection checklist is provided in **Appendix C**.

4.11.2. Environmental monitoring

Environmental monitoring must be documented in the OEMP to ensure the protection of the environment.

The following table provides examples of common types of environmental monitoring that may be required, where applicable, under an OEMP or lease agreement with VicTrack, or external requirements (e.g. EPA permissions or notices). They represent common types of monitoring but do not represent the only types of monitoring that may be required.

Table 7. Environmental Monitoring

Item	Monitoring Examples
Wastes Generated	<ul style="list-style-type: none"> • Industrial wastes generated may need to be sampled and analysed where they are required to be collected and disposed of by a licensed contractor in accordance with EPA Industrial Waste Guidelines • Waste tracking records (e.g. EPA online Waste Tracker) • Any record keeping for that process must be documented in the OEMP
Wastewater / Trade Waste	<ul style="list-style-type: none"> • Where it is to be discharged to sewer, volumes and quality of trade waste must be in accordance with an agreement with the relevant water authority known as a 'trade waste agreement' • The monitoring and reporting required as part of a trade waste agreement should be documented in the OEMP • For wastewater management systems, complying with any requirements of your EPA environmental permission
Stormwater	<ul style="list-style-type: none"> • Schedule of inspections of the stormwater system (e.g. inlets and outlets on site) must be documented to ensure that it is operating effectively and there is no evidence of contaminated water entering • Monitoring of the storage of chemicals or waste must be completed to ensure no pollutants can directly enter any stormwater system
Discharges to Surface Water	<ul style="list-style-type: none"> • It is assumed that the only discharges to surface water will be rainwater. However, if any specific agreements are in place to discharge treated water to surface water the monitoring and reporting associated with that must be documented in the OEMP
Soil	<ul style="list-style-type: none"> • It is not expected that regular monitoring of soil monitoring will be required given that site operations must be conducted in a way that minimises the potential for impact to the environment and people. However, where spills or leaks occur, soil sampling and analysis may be required as part of clean up • There may be baseline soil sampling and assessment required as part of your lease agreement, or provided to you in your lease • If stockpiles of soil are generated or stored on site, appropriate stockpile management, soil transport tracking and waste tracking records (e.g. EPA online Waste Tracker) for disposal
Groundwater	<ul style="list-style-type: none"> • Detail the scope (e.g. frequency, analysis and reporting requirements) of any groundwater monitoring activities. Groundwater monitoring activities must be conducted in accordance with relevant EPA guidelines including Hydrogeological Assessment Guidelines (EPA Publication 668), Groundwater Sampling Guidelines (EPA Publication 669).

4.12. Responsibilities and accountabilities

To ensure the successful implementation of an OEMP, various stakeholders are required to assume responsibility for actions to ensure environmental risks are being managed appropriately. All good OEMPs should document those stakeholders within a “roles and responsibilities” section.

4.12.1. Organisational structure

Specific information regarding your organisational structure, with a focus on those with responsibilities for the development and implementation of the OEMP, is required to be included.

Table 8. Roles and Responsibilities

Role	Responsibility
Site Owner (VicTrack)	Review supplied Tenant OEMP to ensure it meets VicTrack's minimum requirements Provision of guidance to tenants/lessees regarding the minimum requirements expected of an OEMP May conduct compliance auditing and request a copy of the site specific OEMP
Site Occupiers (Tenants / Lessees)	Responsibility for the development, implementation and review of the OEMP, ensuring it reflects site operations, and ensuring controls are put in place to protect people and the environment, with consideration of this guidance document Comply with all relevant legislation and regulations Ensuring that all site occupants, employees, sub-contractors it engages and any other personnel accessing the site whilst under its control are inducted to and comply with the requirements of the OEMP Conducting its own compliance auditing of implementation of the OEMP Reporting any incidents, complaints, non-conformances and corrective actions taken to the Site Owner
Tradesmen / Contractors	Perform any on-site work in the manner specified in the OEMP Develop a task-specific management plan (e.g. JSA or SWMS) with reference to the OEMP guidance, in consultation with the Lessee / Site Manger Reference to the OEMP guidance should be included in site inductions such that all employees and sub-contractors are aware of the requirements of this OEMP

5. Legislative and regulatory framework

It is the responsibility of the lessee to ensure activities are managed to comply with all relevant legislation and regulations.

As part of developing any OEMP, you should provide a commitment to environmental protection during use of the site and a commitment to the implementation of the OEMP.

Legislation, regulations and guidelines relevant to your operations should also be identified and documented in the OEMP. The following sections highlights some key legislation and guidelines associated with environmental management.

5.1.1. Legislation and regulations

Key Victorian legislation and regulations that apply for the protection of the environment include:

- *Environment Protection Act 2017* (Vic)
- *Environment Protection Regulations 2021* (Vic)
- *Environmental Reference Standards* including:
 - Ambient air
 - Ambient sound
 - Land
 - Water

In addition, there are regulations that apply to the safe management of petroleum hydrocarbons which include consideration of protection of the environment. These are:

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- *Dangerous Goods (Storage and Handling) Regulations 2012 (Vic)*
- *Occupational Health and Safety (OHS) Regulations 2007 (Vic)*
- *Occupational Health and Safety Act 2004 (Vic)*
- *Dangerous Goods Act 1985 (Vic)*

5.1.2. Environmental management guidelines

There are a range of guidelines that cover aspects of environmental management. These include guidelines regarding:

- underground petroleum storage systems
- bunding for liquid storage
- stormwater management
- environmental management at major construction sites
- industrial waste including waste categorisation and management, and waste avoidance and reduction

The following environmental management guidelines should be considered when developing the OEMP and management of the asset:

- EPA Publications:
 - *480 – Environmental guidelines for Major Construction Sites, 1996*
 - *668 – Hydrogeological Assessment (Groundwater Quality) Guidelines, 2006*
 - *669 – Groundwater Sampling Guidelines, 2000*
 - *701 – Sampling and analysis of waters, wastewaters, soils and wastes, 2009*
 - *888.4 – The design, installation and management requirements for Underground Petroleum Storage Systems (UPSSs), 2015*
 - *978 – Reducing stormwater pollution: A guide for industry, 2005*
 - *1589 – Contaminated soil – treatment and disposal, 2015*
 - *1667.3 - Management and storage of combustible recyclable and waste materials - guideline*
 - *1695.1 – Assessing and controlling risk: A guide for business, 2018*
 - *1698 – Liquid storage and handling guidelines, 2018*
 - *1730 – Solid storage and handling guidelines, 2019*
 - *1819.1 – Agriculture – guide to preventing harm to people and the environment, 2021*
 - *1820.1 – Construction – guide to preventing harm to people and the environment, 2021*
 - *1822.1 – Manufacturing – guide to preventing harm to people and the environment, 2021*
 - *1825.1 – Waste and recycling – guide to preventing harm to people and the environment, 2021*
 - *1828.2 – Waste disposal categories – characteristics and thresholds, 2021*
 - *1961 – Guideline for Assessing and Minimising Air Pollution, 2022*
 - *1968.1 - Guide to classifying industrial waste, 2021*
 - *1990.1 - Managing industrial waste – Your duties as a waste producer, 2021*
 - *1991 - Responding to harm caused by pollution, 2021*
 - *2001.1 – Guidance for the clean-up and management of contaminated groundwater, 2021*
 - *2008.1 - Notifiable contamination guideline: Duty to notify of contaminated land, 2021*

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- 2010 Potentially contaminated land – A guide for business, 2021
- Worksafe Publications:
 - Industry Standard Contaminated Construction Site – Construction and Utilities, 2017
 - Asbestos-contaminated soil – Guidance Note, 2010

6. Provision of OEMP to VicTrack

On completion of your OEMP, ensure that you provide a copy of the OEMP to VicTrack and/or its leasing agent. VicTrack will review the OEMP and where relevant will provide comment to ensure it meets expectations of VicTrack for your lease and use of VicTrack land.

Before you submit the OEMP, ensure that the OEMP includes all of the relevant requirements specified in this guideline and use the OEMP components checklist provided in **Appendix D** to confirm all sections of the OEMP have been considered prior to submission of the OEMP to VicTrack.

7. Reference documents

These guidelines should be read and applied in conjunction with the following documents:

Document ID	Document Title
PR-GL 003	Environmental Management Plan – Guideline on the management of potentially contaminated land
	Your lease agreement

8. Document review and approval

Delegation	Name	Position	Version	Date
Owner	Narelle Simmons	Group Manager Environment	3.0	27 August 2024
Reviewers	Narelle Simmons	Group Manager Environment	3.0	27 August 2024
Approver	Narelle Simmons	Group Manager Environment	3.0	27 August 2024

9. Document history

Version	Amendment description	Author	Date
Version 1.0	Creation of document	Lyndal Gibbs	4 Nov 2016
Version 2.0	Updated legislation references, changes to reflect new legislation, additional site activity details, inclusion of site general inspection and Appendix C, provision of OEMP to VicTrack section, and Appendix D	Madelyn Nunn	9 March 2022
Version 3.0	Inclusion of OEMP template as Appendix E, inclusion of septic tank information	Madelyn Nunn	6 August 2024

10. Review period

This guideline will be reviewed at least every two (2) years by the Document Owner, or amended as appropriate.

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Appendix A – Guide to Environmental Risk Assessment

Identifying Sources of Risk

Each operational activity or situation that can interact with the environment must be first identified before the risk can be assessed. Identifying sources of risk (hazards) must consider the activities described in Section 3.2 and 3.3. To help identify those risks a checklist is included in **Appendix B**. The checklist in **Appendix B** is provided as an example of the types of issues to consider. Although it includes common sources of potential impacts to the environment it is not designed to be a comprehensive checklist for all types of operations. An example identification of risk table is as follows.

Table 9. Example risk identification

Environmental aspect or hazard	Potential event of incident	Potential consequence	Receptor or surrounding environment	Potential environmental impact
Storage of fuel in an underground tank	Leakage due to holes in the tank or pipeline	Contamination of soil and groundwater	Soil and groundwater	Need for soil clean up and use of groundwater limited due to contamination
Wash water from vehicle maintenance activities	Overflow or wash water and release to stormwater	Contamination of stormwater	Surface water at stormwater discharge point	Contamination may impact on the aquatic ecosystem

Assessing Likelihood

The likelihood of each risk occurring should be considered using descriptions such as those in the example risk matrix below. The five likelihood rating levels should remain but the descriptions can be modified to suit the operational context of the site.

Assessing Consequence

The consequence, if each event were to occur, is to be determined using descriptions such as those in the example risk matrix below. Similar to assessing likelihood the descriptions can be modified to suit the operational context of the site.

Assessing Level of Risk

Risk is defined as a function of the likelihood of a hazard occurring and the consequences of that hazard. As a mathematical formula, risk is represented by the following equation:

$$\text{Risk} = \text{Consequence} \times \text{Likelihood}$$

An example risk matrix table is provided below, taken from *EPA Publication 1695*. Additional categories may be added but the levels of risk must be clearly defined.

Figure 1. Example risk matrix (Source: EPA Publication 1695)

Permanent or long-term serious environmental harm / life threatening or long-term harm to health and wellbeing. Serious environment harm / high-level harm to health and wellbeing. Medium level of harm to health and wellbeing or the environment over an extended period of time. Low environmental impact / low potential for health and wellbeing impacts. No or minimal environmental impact, or no health and wellbeing impacts.	Consequence	Severe	Medium	High	High	Extreme	Extreme
		Major	Medium	Medium	High	High	Extreme
		Moderate	Low	Medium	Medium	High	High
		Minor	Low	Low	Medium	Medium	High
		Low	Low	Low	Low	Medium	Medium
		Rare	Unlikely	Possible	Likely	Certain	
		Likelihood					
		Could happen but probably never will	Not likely to happen in normal circumstances	May happen at some time	Expected to happen at some time	Expected to happen regularly under normal circumstances	

Description of risk ratings

Risk level	Description
Extreme	Totally unacceptable level of risk. Stop work and/or take action immediately.
High	Unacceptable level of risk. Controls must be put in place to reduce to lower levels.
Medium	Can be acceptable if controls are in place. Attempt to reduce to <i>low</i> .
Low	Acceptable level or risk. Attempt to eliminate risk but higher risk levels take priority.

Environmental Risk Register

The lessee must use the outcomes of the environmental risk assessment to develop and maintain a risk register. Examples are provided below as Figure 2, and an example template as Figure 3.

Figure 2. Example risk registers.

Table 5: Example risk register

Date	Location	Environment element	Aspects (activities/ emissions for each phase of project)	Potential impact	Pathways for risk (factors influencing risk occurring)	Existing control	Likelihood	Consequence	Level of risk	Comments
[Include the date of assessment]	[Indicate where the hazard is located. This might be a readily recognised description of the location or GPS coordinates.]	[Indicate what element the risk relates to. For example; air, water, and land.]	[List the environmental aspects and hazards of the site.]	[Describe the potential consequence if an incident were to occur.]	[What are the things that increase the likelihood of the risk occurring?]	[What are the controls that are in place to try and prevent or mitigate the risk?]	[Insert the 'likelihood level' from Table 2.]	[Insert the 'consequence level' from Table 3.]	[Insert the 'level of risk' from Table 4. Including the colour code for the level of risk helps to visualise the results.]	[Include any additional comments that are relevant to interpretation of the level of risk. See level of risk descriptors in 4.3.3.]
01 Sep 2009	Discharge point 1, at the rear of the property behind building 15.	Water	Wastewater with high nutrient levels being discharged to receiving waters.	Algal blooms leading to fish deaths and ecosystem degradation. Also preventing recreational use of the waterway by swimmers and boaters etc.	Low flow of receiving waters, sunlight and elevated water temperature. Issues with treatment of the wastewater, such as equipment failure.	Secondary treatment of wastewater. Maintenance of treatment processes and equipment.	B	3	High	Looking to upgrade the level of wastewater treatment, so will re-address the level of risk when upgrade is done.
01 Sep 2009	Tank farm	Air	Storage of odorous chemicals.	Offensive odours reducing amenity of downwind areas.	Tank venting via carbon canister – failure of canister.	Carbon canister used to adsorb chemicals.	E (due to frequent servicing)	2	Medium	Canister requires regular servicing to maintain this level of risk

Environmental Risk Register

As at 12 March 2012. Updated version available at <www.sustainability.unsw.edu/risk>

Category	Description of Hazard/Risk	Raw Risk Assessment		Raw Risk Rating	Legislation	Standards/Codes/ Guidance	University Policies/Procedures	Controls	Residual Risk Rating
		L*	C*						
1. Chemical	<ul style="list-style-type: none"> • Environmental pollution due to accidental leakage, spills, emissions: <ul style="list-style-type: none"> ○ air ○ water ○ soil/ground • Compliance issues, breach of licenses • Production of hazardous waste • New chemicals arising from research with uncertain properties and subsequent environmental affects 	B	2	Extreme	<ul style="list-style-type: none"> • Protection of the Environment Operations Act 1997 • Environmentally Hazardous Chemicals Act 1985 • Dangerous Goods (Road and Rail Transport) Act 2008 • Environment Protection and Biodiversity Conservation Act 1999 • Poisons and Therapeutic Goods Act 1966 • Contaminated Land Management Act 1997 	<ul style="list-style-type: none"> • AS/NZS 2243 Safety in laboratories • AS 1940: 2004 The Storage and Handling of Flammable and Combustible Liquids. • AS/NZS 2243.1: 2005 Safety in Laboratories Part 1: Planning and operational aspects • AS/NZS 2243.10: 2004 Safety in Laboratories Part 10: Storage of Chemicals • AS/NZS 2243.2: 2006 Safety in Laboratories Part 2: Chemical Aspects • AS/NZS 4452: 1997 The Storage and handling of Toxic Substances 	<ul style="list-style-type: none"> • Environmental Law Compliance Register • UNSW Environmental Risk Assessment procedure • UNSW Environmental Policy • Green Lab Environmental Compliance Training and resources • Hazardous waste removal and storage procedures 	<ul style="list-style-type: none"> • Risk assessments • Staff and student work specific training • Green Lab Environmental Compliance training and audits • Hazardous waste is removed according to proper procedures • Hazardous waste is stored in designated special facilities 	Low

Figure 3. Example hazard and risk register template

This register is appropriate for low risk businesses. High risk or large businesses may need to adopt a more complete register.

Hazard	Potential harm	Risk assessment			Existing controls	What further controls are required	Actions		
		Consequence	Likelihood	Risk rating			Action by	Due date	Date complete

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Appendix B – Operations – Review Checklist

Site and Contact Details

Tenant Details		
Company:		
Address/location:		
Site Contact Name	Relationship to Site	Phone Number
Contact 1:		
Contact 2:		
Other		
Site Buildings, Infrastructure and Operations		
Potential Sources of Contamination (e.g. tanks, fuel/chemical/ waste storage, trade waste, maintenance areas, substations):		
Chemicals / Raw materials used on-site (types & volumes)		
Describe how materials are handled, if you have any operating procedures		
Known Spills / Leaks (Details of spill/leak type (i.e. chemical/fuel), source, location, extent, amount lost, remedial actions, etc)		
List any known environmental permissions from EPA for your activities:		

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Chemical Storage – above ground

Describe chemical storage area (e.g. container, drum storage, tank). Are drums/containers/above ground tanks undercover? Where are they located? Are containers/drums/above ground tanks empty or full? Are drums/containers secured? What is the size of any above ground tank(s) or containers?

Are containers storing liquid on an impervious base free of cracks or gaps? Is there any adequate secondary containment / bunding system for spills? Is there potential for neighbouring stormwater drains to be impacted? Does the secondary containment meet Australian Standards

If area is bunded, how is accumulated rainwater or spills removed from the area? Are there any pits or interceptors? Is there any evidence of bund contents being emptied (receipts)?

Are all drums/containers securely closed? Are all in good condition? Describe the condition.

Are all drums/containers/above ground storage tanks labelled appropriately? Are all drums segregated by hazard class? Is appropriate hazardous goods signage evident?

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Chemical storage - Underground Storage Tanks (USTs)

UST	Product ₂	Type ¹	Capacity	Status ₃	Age	Last Inspection / Integrity Test	Overfill Protection	Leak Detection Type
1								
2								
3								
4								
<p>¹ Steel, fibreglass, split compartment, etc. ² Unleaded Petrol (ULP), Premium Unleaded Petrol (PULP), Diesel, Liquid Petroleum Gas (LPG), waste oil, etc. ³ In use, decommissioned, abandoned, unknown.</p>								
<p>Describe fill points and bowsers for each UST (if relevant)? Are spills and leaks evident in these areas?</p>								
<p>Are groundwater monitoring wells and spill containment present?</p>								
<p>Have USTs and associated fuel lines had integrity testing completed recently? Have the tests passed?</p>								

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Stormwater (SW), waste water and Trade Waste Management

Describe general facility appearance (housekeeping, major staining)? Nature and extent of site paving? Where does SW pool? Ground slopes between SW points? Sheen on SW puddles?

How is stormwater run-off from the facility controlled? Is stormwater diverted away from process, maintenance, fuelling and chemical storage areas? Where is stormwater run-off from the site discharged too?

What wastewater discharge points are located on-site? What are the nature of the discharge points (septic system, trade waste system, outfall to surface water)?

What waste water treatment systems are located on-site (oil/water separators, triple interceptors, biological treatment, filtering (sand, bag, cartridge), physical/chemical treatment)?

List any trade waste discharge permits, environmental permissions and any discharge monitoring practices

Has the facility received any warning, violations or fines for not meeting the discharge criteria?

Where possible, obtain annual trade waste discharge volumes (compare to stormwater runoff estimates)

What is the quality of trade waste? Soil and grease content? Obtain latest analytical data?

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Waste Management

Identify all liquid waste streams (e.g. used oil, tank sludge, solvents, soil) generated or handled at the site, and describe how it is stored / treated

--

Identify all solid waste streams (e.g. spent filters, batteries, etc) generated or handled at the site, and describe how it is stored / treated

--

Are there on-site waste disposal practices (e.g. collection for disposal to landfill, thermal unit, combined with waste water, impoundment lagoon)? What waste streams does this include?

--

Is any waste received on site? Do you have any environmental permissions for receiving or transporting waste?

--

Are spill kits located in the area? Are spill trays used to collect waste oils? Do employees/site workers demonstrate a good understanding for waste management requirements?

--

Is there evidence of waste disposal (i.e. waste transport certificates, invoices from waste collectors)?

--

Waste Storage Container
Type and Location

Disposal Method

Quantity

Waste Storage Container Type and Location	Disposal Method	Quantity

Dust Management and Emissions

Identify any sources of dust, and any controls to suppress dust

--

Consider all emissions generated from site operations, and any emission control systems in place

--

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Appendix C – Example site inspection checklist

Inspection Register	
Date:	Time:
Name:	Title/role:
Signature:	

Inspection Details

Attribute	Issue observed (Y/N/NA)	Description/comments	Action required (Y/N)
Storage and management			
Is the ground surface sealed and in good condition (e.g. no cracks, staining)?			
All chemicals / fuels / raw materials stored in an appropriate manner in dedicated areas?			
Are all storage containers in good condition, with intact lids, no rust or holes or signs of leakage or spills?			
Are all chemical containers and tanks kept within effective secondary containment?			
Is there a spill kit nearby that contains adequate materials and is well stocked?			
Are drip trays being used and effective in capturing spills when decanting or refuelling?			
Is there any evidence of leaks?			
Is there any evidence of spills?			
Are pits/interceptors/wastewater management systems in good working condition?			
Are stormwater inlets and outlets operating effectively, and no evidence of contaminated water entering?			
Bunds/secondary containment areas appear in good			

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Attribute	Issue observed (Y/N/NA)	Description/comments	Action required (Y/N)
condition? Are they adequate for the materials stored?			
Do any bunds need emptying of accumulated water?			
Containers and storage areas secure and labelled?			
All chemicals/fuels listed in site register?			
Site OEMP is available on site?			
Waste Management			
Are wastes stored in covered bins or skips or stored under cover?			
Is waste being kept to a practicable minimum and disposed of appropriately offsite?			
Are any bins overflowing? Is there any surplus waste, or stockpiled material / soil?			
Are the waste type volumes at any time on-site <5m ³ ? (Waste tyres >5m ³ at any time on-site will require tenant to obtain EPA permissions)			
Are all batteries stored undercover on a sealed surface within secondary containment?			
Training and incidents			
All staff are trained on environmental procedures and inducted to the OEMP?			
No dust is escaping the site?			
Have any environmental incidents occurred, and have they been reported to VicTrack and the EPA?			
Monitoring requirements undertaken, as required (e.g. under trade waste agreement, groundwater monitoring)?			

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Attribute	Issue observed (Y/N/NA)	Description/comments	Action required (Y/N)
Have all environmental permissions and agreements been obtained for the site activities? Are the conditions of these (if any) being complied with?			
Soil stockpile management			
Are soil stockpiles located away from waterways and drainage lines?			
Are surface water flows diverted around stockpiles?			
Are silt screens, geofabric or other suitable materials being used to trap sediment emanating from the base of the stockpile?			
Are all potentially contaminated or contaminated material stockpiles covered with a tarpaulin?			
Are all highly contaminated materials covered and located on impervious ground within secondary containment?			

Action record

Action Item	Person Responsible	Date Action Item completed	Signature

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Appendix D – OEMP components checklist

OEMP component (minimum requirements)	Included/complete (Y/NA)
Site details (refer to Section 4.1.1)	
Site-specific activities/operations (refer to Section 4.1.2)	
Site plan (refer to Section 4.1.3)	
Environmental site conditions (where relevant) (refer to Section 4.1.4)	
Environmental risk assessment (refer to Sections 4.2-4.3) <ul style="list-style-type: none"> • Considers Appendix B checklist 	
Environmental management procedures / controls for activities/operations (refer to Section 4.4)	
Contingency plans (refer to Section 4.5): <ul style="list-style-type: none"> • Emergency/incidents, including reporting • Spills • Unexpected finds • Notification of incidents/pollution • Notification of contamination 	
Environmental permissions (refer to Section 4.6)	
Record keeping (refer to Section 4.7)	
Training requirements (refer to Section 4.8) <ul style="list-style-type: none"> • Sign on/induction sheet/register 	
OEMP Auditing (refer to Section 4.9)	
OEMP Review (refer to Section 10)	
Site inspection details / frequency (refer to Section 4.11.1)	
Environmental monitoring (refer to Section 4.11.2)	
Roles and responsibilities (refer to Section 4.12) <ul style="list-style-type: none"> • Organisational structure (where relevant) 	
Provision of the OEMP to VicTrack/leasing agent	

Appendix E – OEMP template

This OEMP template has been developed to assist small business', community groups, sole traders or non-for-profit organisations (or other Tenants where agreed with VicTrack), to comply with the requirements of a lease or non-compliance notice (where applicable). It may also be used voluntarily by Tenants to document risks of harm and controls in line with their General Environmental Duty of the *Environment Protection Act 2017 (Vic)*.

This OEMP template aims to address the variety of different hazards and activities you may undertake on VicTrack land.

If you would like a Microsoft Word version of this template document, please request this from your leasing agent.

When using this OEMP template, you are required to fill out each section with the relevant site-specific description or select the relevant tick box (you can select or write down "Not Applicable" or "N/A" if a section is not relevant to your operations and activities).

Disclaimer

This document is reviewed periodically and new editions may be published. It is important that users ensure when reviewing and updating their OEMP that they consult with VicTrack on the latest version of this template published by VicTrack at any time.

Information contained in this document does not constitute legal or any other professional advice.

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Nothing in this document diminishes the responsibility of designers and constructors for applying the requirements of any applicable law or standard.

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

Site Address / Railway Lot ID	
Organisation (where relevant)	
Name and position of person preparing this OEMP	
Date this OEMP was prepared	
Next review date (aim for at least every 3-5 years)	
Record keeping Where is this OEMP to be kept/saved?	

Table 1. Site information

Item	Relevant Site Information
Describe the activities undertaken on site (e.g. servicing of cars)	
Describe the key features on the site (e.g. buildings, site surface, chemical or fuel storage areas, fuel pipework /dispensers, monitoring bores, septics (on-site wastewater) tanks/systems).	

Describe the site condition of the ground surface
(e.g. concrete in good condition with no visible cracks)

Please provide a site plan in Attachment 1 with the following details:

Site plan attached:

Yes

No

- **Site boundary**
- **Key site features**
- **Environmental control areas (spill kits, bunds, storage areas (chemical/oils / waste)**
- **Any monitoring bores (if present)**

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Table 2. Existing environmental records

Item	Relevant Site Information
<p>Do you have any existing environment or asbestos reports?</p>	<p> <input type="checkbox"/> Yes – prepared by/for you <input type="checkbox"/> Yes – prepared by VicTrack <input type="checkbox"/> No </p> <p>If yes, please describe where known (e.g. biodiversity, cultural heritage information, asbestos registers, environmental site assessments):</p>
<p>Do you know of any management plans provided to you (e.g. in the lease)?</p>	<p> <input type="checkbox"/> Asbestos Management Plan <input type="checkbox"/> Environmental Management Plan <input type="checkbox"/> Biodiversity Management Plan <input type="checkbox"/> Cultural Heritage Contingency Plan <input type="checkbox"/> Other <input type="checkbox"/> None </p>
<p>Have you had any EPA visits / EPA notices at the site? If yes, please describe</p>	<p> <input type="checkbox"/> No <input type="checkbox"/> Yes, describe: </p>
<p>Do you need any environmental permission for your site activity?</p>	<p><i>Under the Environment Protection Act 2017 (Vic), an activity that may present a risk to human health or the environment and where assurance is needed that the risks from the activity are being effectively managed, must be regulated by EPA by obtaining a permission for that activity. More information can be found in Section 4.6 of the VicTrack PR-GL 002 Preparation of Operational Environmental Management Plan Guidance Document</i></p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No, proceed to Table 3 </p>
<p>Do you have any existing environmental permission?</p>	<p> <input type="checkbox"/> Registration, provide EPA reference number: <input type="checkbox"/> Permit, provide EPA reference number: <input type="checkbox"/> Licence, provide EPA reference number: <input type="checkbox"/> No, yet to be completed </p>
<p>Are there any conditions in the permission? If yes, please describe</p>	<p> <input type="checkbox"/> None <input type="checkbox"/> Yes. Conditions: </p>

Legal Context

The General Environmental Duty (GED), contained in the *Environment Protection Act 2017* (Vic) (EP Act), requires any person who is engaging in an activity that may give rise to risk of harm to human health or the environment from pollution or waste to minimise those risks, so far as reasonably practicable, including:

- Use and maintain plant, equipment, processes and systems in a manner that minimises risks of harm to human health and the environment from pollution and waste;
- Use and maintain systems for identification, assessment and control of risks of harm to human health and the environment from pollution and waste that may arise in connection with the activity, and for the evaluation of the effectiveness of controls;
- Use and maintain adequate systems to ensure that if a risk of harm to human health or the environment from pollution or waste were to eventuate, its harmful effects would be minimised;
- Ensure that all substances are handled, stored, used or transported in a manner that minimises risks of harm to human health and the environment from pollution and waste; and
- Provide information, instruction, supervision and training to any person engaging in the activity to enable those persons to comply with the GED.

The EP Act provides the following guidance on what is meant by so far as reasonably practicable:

1. *A duty imposed on a person under this Act to minimise, so far as reasonably practicable, risks of harm to human health and the environment requires the person —*
 - a. *to eliminate risks of harm to human health and the environment so far as reasonably practicable; and*
 - b. *if it is not reasonably practicable to eliminate risks of harm to human health and the environment, to reduce those risks so far as reasonably practicable.*
2. *To determine what is (or was at a particular time) reasonably practicable in relation to the minimisation of risks of harm to human health and the environment, regard must be had to the following matters —*
 - a. *the likelihood of those risks eventuating;*
 - b. *the degree of harm that would result if those risks eventuated;*
 - c. *what the person concerned knows, or ought reasonably to know, about the harm or risks of harm and any ways of eliminating or reducing those risks;*
 - d. *the availability and suitability of ways to eliminate or reduce those risks;*
 - e. *the cost of eliminating or reducing those risks.*

Hazard Identification

Below is a list of activities that have the potential to cause harm to the environment and people (e.g. spills, leaks, dust generation, waste). Please select all that apply to your Site and operations, and list others as required.

Table 3. Hazard identification table

Activity	Environmental Hazard
<input type="checkbox"/> Bulk storage of chemicals/oils/fuels or dangerous goods – in an above ground storage tank & associated pipework (often greater than 5,000L)	Uncontrolled release of fuels and chemicals to land, stormwater, surface water and/or groundwater due to inadequate bunding, improper disposal or containment failure
<input type="checkbox"/> Bulk storage of chemicals/oils/fuels or dangerous goods – in an underground storage tank & associated pipework (often greater than 5,000L)	Uncontrolled release of fuels and chemicals to soil and/or groundwater due to inadequate bunding, improper disposal or containment failure
<input type="checkbox"/> Bulk storage of chemicals/oils/fuels or dangerous goods – in containers (e.g. IBCs) and/or multiple drums (greater than 1,000L)	Uncontrolled release of fuels and chemicals to land, stormwater, surface water and/or groundwater due to inadequate bunding, improper disposal or containment failure
<input type="checkbox"/> Storage of chemicals/oils/fuels or dangerous goods in quantities greater than 220L and less than 1,000L (e.g. multiple drums)	Uncontrolled release contents to land, stormwater, surface water and/or groundwater due to inadequate bunding, improper disposal or containment failure
<input type="checkbox"/> Storage of chemicals/oils/fuels or dangerous goods in a drum (e.g. 220L)	Uncontrolled release contents to land, stormwater, surface water and/or groundwater due to inadequate bunding, improper disposal or containment failure
<input type="checkbox"/> Storage of chemicals/oils/fuels or dangerous goods in quantities less than 50L (e.g. jerry cans)	Uncontrolled release of fuels and chemicals (<50 L) to land, stormwater, surface water and/or groundwater due to inadequate bunding, improper disposal or containment failure
<input type="checkbox"/> Maintenance pits/sumps (vehicle/equipment inspection and maintenance pits)	Pit failure causing uncontrolled release, resulting in pollution.
<input type="checkbox"/> Refuelling (plant, equipment, vehicles)	Spillage of fuel during handling, resulting in pollution.
<input type="checkbox"/> Storage of fertilisers	Uncontrolled release during storage or handling, causing pollution. Leaching of fertiliser to soil during storage, causing pollution of land.
<input type="checkbox"/> Storage of waste tyres greater than 5m ³	Fire hazard Leaching of contaminants to land
<input type="checkbox"/> Storage of industrial waste (e.g. waste oils, oily rags, ash/coke, empty oil/chemical/fuel containers, batteries)	Fire risk Leaching of contaminants to land
<input type="checkbox"/> Septic tanks or other on-site wastewater management systems	Overflowing or leaking, causing contamination to soil and potentially groundwater.
<input type="checkbox"/> Stockpiled material (open air)	Dust inhalation Contamination to land and surface water
<input type="checkbox"/> Servicing / repairs / maintenance	Minor spills of fuel or oil causing contamination to land Minor spills of fuel or oil, running off to stormwater systems and natural receiving water bodies

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	Activity	Environmental Hazard
<input type="checkbox"/>	Triple Interceptor Trap (TIT)	Overflowing or leaking, causing contamination to soil and potentially groundwater.
<input type="checkbox"/>	Truck/car/vehicle washing or wash bays	Wash waters running off to stormwater systems, causing pollution to stormwater and natural receiving water bodies.
	<i>Describe any other site-specific activity and environmental hazards in the rows below:</i>	

Risk Assessment

Using the hazards identified in Table 3 above, prepare a risk assessment in the below table for each hazard.

You can use the risk matrix in Appendix A, Figure 1 of the PR-GL 002 *Preparation of Operational Environmental Management Plans Guideline for third parties who occupy VicTrack land* to assist with terms and definitions of likelihood, consequence and risk.

Table 4. Risk assessment

Hazard description / environmental risk	What is the likelihood of it happening	What is the consequence	Risk level
<i>E.g. 1: Uncontrolled release of fuels and chemicals (<220 L) to land, surface water and/or groundwater due to inadequate bunding, improper disposal or containment failure</i>	<i>Possible</i>	<i>Minor</i>	<i>Medium</i>
<i>E.g. 2: Uncontrolled release or leak of fuel to soil, surface water and/or groundwater when refuelling vehicles or equipment</i>	<i>Likely</i>	<i>Moderate</i>	<i>High</i>

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Hazard description / environmental risk	What is the likelihood of it happening	What is the consequence	Risk level

Dangerous Goods

Table 5. Dangerous Goods Register

Item	Relevant Site Information
Do you have any chemicals oils /fuels/ dangerous goods or raw materials on-site?	<input type="checkbox"/> Yes. If yes, please complete the below table <input type="checkbox"/> No, please go to Environmental Controls section

Name of chemical	Issue date of SDS *	Volume / quantity	Location stored	Comment
<i>Example: Ethanol</i>	<i>19/02/2021</i>	<i>10 L</i>	<i>Flammable liquid cabinet in storage room 1</i>	<i>Solvent for paint</i>

Notes:

* SDS = Safety Data Sheet. SDS's have an expiry of 5 years and need to be updated accordingly.

Environmental Controls

In Table 6 to Table 11 below, document how the hazards identified in Table 3 will be controlled on your site to eliminate or reduce the risk as far as reasonably practicable. Select all that apply in the “Control measure to be implemented”.

Please provide a storage description in Column 2 where requested or provide photos / plans. Further information on best practice storage can be found in the VicTrack PR-GL 002 *Preparation of Operational Environmental Management Plan Guidance Document*.

Table 6. Environmental controls – Chemicals, Oils and Dangerous Goods

Environmental hazard	Control measure to be implemented
<p>Dangerous goods, chemicals, oils and any other items / materials leaking and causing pollution.</p> <p><i>Are dangerous goods, chemicals, oils and/or items and materials stored in a way that would contain any leaks?</i></p>	<p><input type="checkbox"/> Not Applicable. No dangerous goods/chemicals/oils/fuels stored or handled on site (includes refuelling with mobile tanker). Proceed to Table 7</p> <p><input type="checkbox"/> Stored undercover</p> <p><input type="checkbox"/> Stored on sealed surface (e.g. concrete)</p> <p><input type="checkbox"/> Stored in a flammable liquid / dangerous goods cabinet</p> <p><input type="checkbox"/> Stored in a bunded area</p> <p><input type="checkbox"/> Self-bunded</p> <p><input type="checkbox"/> Fuel bowsers fitted with trigger nozzles that include auto-shut/cut off valves</p> <p><input type="checkbox"/> Leak detection systems in place</p> <p><input type="checkbox"/> Containers in good condition – with intact lids, no rust / holes or signs of leakage</p> <p><input type="checkbox"/> Stored away from stormwater drains</p> <p>Other:</p> <p><u>Describe:</u></p>

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Environmental hazard	Control measure to be implemented
<p>Dangerous goods, chemicals, oils and any other items / materials spilling during handling and causing pollution.</p> <p><i>Are materials handled in a way that would contain spills? Please describe.</i></p>	<p><input type="checkbox"/> Designated bunded refuelling / handling areas. Please identify the location on site:</p> <p><input type="checkbox"/> Portable bunding. Please identify location on-site:</p> <p><input type="checkbox"/> Use of drip trays / oil mats. Please identify location on-site:</p> <p><input type="checkbox"/> Refuelling / handling of materials undertaken way from stormwater drains.</p> <p><input type="checkbox"/> Regular inspections for spills and to check efficiency of existing controls.</p> <p><input type="checkbox"/> Refuelling areas are sealed</p> <p><input type="checkbox"/> Annual tank & pipe integrity testing</p> <p><input type="checkbox"/> Annual servicing of leak detection systems</p> <p><input type="checkbox"/> Spill kit kept on site in a designated area, and staff are aware and trained in its use.</p> <p><u>Describe:</u></p>
<p>Is there a fully stocked spill kit on site?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Please identify the location on site:</p>
<p>Has there been any training/induction/demonstration to staff/workers/site users on using the spill kit?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Please outline any details:</p>

Table 7. Environmental controls – Stormwater

Environmental hazard	Control measure to be implemented
<p>Contaminated stormwater run-off leaving site and potentially causing contamination to receiving water bodies and groundwater.</p> <p><i>How is stormwater run-off controlled? Is stormwater diverted away from process, maintenance, refuelling and fertiliser / chemical storage areas?</i></p> <p><i>Where is stormwater run-off from the site discharged too?</i></p>	<p><input type="checkbox"/> Not Applicable</p> <p><input type="checkbox"/> Yes, stormwater runoff is diverted away from site activity areas.</p> <p><input type="checkbox"/> No, stormwater runoff is not diverted from site activity areas.</p> <p><u>Describe:</u> <i>Please provide details on any treatment of stormwater, where it is discharged to, including information on any trade waste agreement / consent to sewer, or if stormwater requires collection and offsite disposal:</i></p>

Table 8. Environmental controls – Wastewater

Environmental hazard	Control measure to be implemented
<p>Wastewater storage leaking or spilling and causing pollution to soil and groundwater.</p>	<p><i>Are there any onsite wastewater management systems?</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> None/Not applicable, proceed to Table 10 <input type="checkbox"/> Septic tank <input type="checkbox"/> Triple interceptor trap <input type="checkbox"/> Pureceptor <input type="checkbox"/> Other onsite wastewater management system: <p><i>How are these systems managed?</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Trade Waste Agreement. <ul style="list-style-type: none"> - Agreement number: _____ <input type="checkbox"/> Regular maintenance of onsite wastewater systems. <ul style="list-style-type: none"> - Are maintenance records maintained? Please describe: <p><input type="checkbox"/> Regular inspections of onsite wastewater systems for any failure signs</p>

Table 9. Onsite Wastewater Management System (OWMS) Details

Item	Detail/describe
Capacity of OWMS	
Failure Signs of System	
Required Maintenance (including frequency)	
Where will maintenance records be kept (keep records of maintenance/pump out/servicing for at least 5 years)?	

Table 10. Environmental controls – Dust

Environmental hazard	Control measure to be implemented
<p>Inhalation of contaminated dust</p> <p><i>Are there any sources of dust, and any controls to suppress dust (e.g. water mist)?</i></p>	<p><input type="checkbox"/> Not applicable (no dust sources), proceed to Table 11</p> <p><input type="checkbox"/> Water misting / wetting down areas</p> <p><input type="checkbox"/> Sealed areas</p> <p><input type="checkbox"/> Adequate cover</p> <p><input type="checkbox"/> Undercover</p> <p><u>Please provide any additional pertinent information:</u></p>

Table 11. Environmental controls – Waste

Environmental hazard	Control measure to be implemented
<p>Incorrect management of waste leading to contamination / pollution of land, stormwater, water ways and groundwater.</p> <p><i>Are there systems in place to manage and regularly dispose of waste on Site?</i></p>	<p><i>What wastes are stored on site (including priority waste¹ and/or reportable priority waste²)?</i></p> <p><input type="checkbox"/> None, no waste is generated or stored. Proceed to Table 12</p> <p><input type="checkbox"/> General waste</p> <p><input type="checkbox"/> Waste oil, fuel, chemicals, paint, or other hazardous liquids</p> <p><input type="checkbox"/> Empty oil / fuel / chemical containers and drums</p> <p><input type="checkbox"/> Oily rags</p> <p><input type="checkbox"/> Tyres</p> <p><input type="checkbox"/> Batteries</p> <p><input type="checkbox"/> Inert / industrial waste, such as scrap metal, wood, concrete, bricks, building rubble</p> <p><input type="checkbox"/> Recyclable material. Please describe:</p> <p><input type="checkbox"/> Other. Please describe:</p> <p><i>Are there any onsite waste controls?</i></p> <p><input type="checkbox"/> Waste stored in a dedicated waste area(s)</p> <p><input type="checkbox"/> Waste stored on sealed/concrete areas</p> <p><input type="checkbox"/> Waste volumes maintained to practical minimum</p> <p><input type="checkbox"/> Waste stored away from drains</p> <p><input type="checkbox"/> Secondary containment / bunding</p> <p><input type="checkbox"/> Bunded cabinet /container</p> <p><input type="checkbox"/> Waste stored undercover</p> <p><input type="checkbox"/> Fully stocked spill kit near waste storage areas</p> <p><input type="checkbox"/> Use of licenced contractors for disposal</p> <p><input type="checkbox"/> Waste classification information kept on site</p> <p><input type="checkbox"/> Tyre volume kept to <5m³</p> <p><input type="checkbox"/> EPA waste online tracker used for reportable priority waste and soils</p> <p><input type="checkbox"/> Other:</p>
<p>Where will records of waste disposal and tracking be kept/saved (keep for 5 years)?</p>	

Notes:

1. **Priority waste** is described by EPA Vic as a subset of industrial waste such as processed food waste, e-waste and liquid organic wastes which have greater regulatory controls.
2. **Reportable priority waste** is described by EPA Vic as a subset of priority waste that is generally hazardous by nature and poses the greatest risk to the environment and human health. This waste has the highest levels of regulatory controls.

Contingency Plans

Site emergency plan

In the context of this OEMP, an environmental emergency or incident is any event that can cause or has the potential to cause material harm to the environment or human health.

You have a duty under the *Environment Protection Act 2017* (Vic) to respond to harm by taking steps to clean and restore the environment if pollution occurs. If a pollution event causes or threatens harm to human health or the environment, you are required under the *Environment Protection Act 2017* (Vic) to contact the EPA, as soon as practical.

Note that VicTrack can assist in determining if the incident requires notification to EPA.

Emergency contact information

In the event of an environmental emergency, contact EPA Victoria and VicTrack as soon as practicable.

Please include your own personnel and relevant emergency contact details in the below.

Table 12. Emergency contact information

Company	Contact name	Contact number
Emergency services	-	000
EPA Victoria	-	1300 372 842
WorkSafe Victoria	-	1800 146 089
The Victorian Poisons Information Centre	-	13 11 26
VicTrack	-	03 9619 1111
Leasing agent		

General spill response procedure / management

Spills are expected to be the most common item that will require emergency management. In the event of an identified spill incident, all efforts must be undertaken to contain and minimise the effect of the incident on the environment. This can be achieved by isolating the cause and erecting suitable barriers to prevent the spread or flow of the spilled material. General spill responses to follow are outlined below:

Immediately after a spill, following the below actions can limit the spread of spilled material:

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- A punctured drum or jerry can which is spilling material can be rolled over so that the puncture is on top to slow the rate of the spill.
- If a fallen drum is leaking from the top, it can be placed upright again.
- Broken or damaged pipes which are leaking may be stopped by closing an up-stream valve or shutting down a pump.

An appropriately sized spill kit is to be located near any chemical storage or potential spill areas, and the contents of this spill kit used to clean up and capture the spill:

- Appropriate training of personnel who will need to use spill kits. The locations, contents and use of spill kits must be documented in the OEMP.
- Where potentially large quantities may be involved, a spill response may include use of educator trucks to retrieve spilled material.
- Appropriate PPE shall be worn whilst cleaning the spilled contents. This includes protective chemical gloves and safety goggles.
- Containment measures are to be placed around the perimeter of the spill area to contain any liquid and stop it from spreading.
- Absorbent pads are to be placed on top of the spill and the liquid, with the soaked pads removed and placed in the provided waste bags.
- The spill area is to be cleaned with a suitable detergent and water.

If it is deemed the spill incident could cause “material harm” to human health or the environment (noting that VicTrack can assist in determining this), the EPA must be immediately notified on 1800 372 842. Material harm is defined as:

- There is an adverse effect on human health or the environment.
- There is an adverse effect on an area of high conservation value or of special significance.
- The clean-up or management of the pollution or cost of restoration would cost \$10,000 or more.

VicTrack must also be given prompt written notice of the occurrence of any spills at the site.

In the event of a major spill which cannot be contained with the contents of the spill kit, the following actions are to be taken:

- Notify emergency services on 000.
- Alert people in the area and evacuate the area, ensuring people are upwind from the spill or keep persons indoors to avoid inhalation of potentially dangerous fumes.
- If safe to do so, block and cover all entrances to stormwater drains, flow-through interceptor pits or other water bodies to protect these from spilled material runoff.

Engage a licenced waste contractor to collect and dispose of the spilled material.

- Sampling may be required through the engagement of a suitably qualified environmental consultant to assess the extent of impact to the environment (soil, groundwater and/or surface water) and where necessary impacted material may need to be excavated, treated and/or disposed.
- Preparing an incident report and reviewing site practices for areas of improvement

Unexpected Finds

During site works that involve subsurface disturbance of site soils, such as removing existing concrete slabs, or creating excavations for site improvements, there is potential for unexpected finds. Unexpected finds include contaminated materials such as soil and/or water with visible (e.g. staining) or odours signs of contamination, buried waste or suspected asbestos.

Where encountered the following protocol must be adopted:

- Stop work

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- Isolate the area from site personnel and the public and make the site safe
- Notify VicTrack or the landowner of the unexpected find
- With the assistance of VicTrack, determine if the identified contamination is Prescribed Notifiable Contamination (PNC) and if it is, notify the EPA.
- You may need to engage an environmental professional to assist with identification and management options, or discuss it with VicTrack.

Thresholds and descriptions for PNC are defined in Part 2.1 of the *Environmental Protection Regulations 2021* (Vic) and include the following issues that may be notifiable. Typically, monitoring and assessment will be required to gather the required information for notification:

- Soil contamination, including if it has moved or is likely to move onto adjacent land.
- Friable asbestos in or on soil.
- Actual or likely contamination of groundwater or surface water that is being used or may be used.
- Presence of any non-aqueous phase liquid in soil, surface water or groundwater.
- Soil vapour contamination above certain thresholds.
- Onsite retention of soil (other than fill material) from contaminated land source onsite that is not an activity for which an environmental permission is required.

EPA Publication 2008.2 – Guide to the duty to notify of contaminated land provides further details on notification of contamination and is available on the EPA website.

Notification of contamination

The *Environment Protection Act 2017* (Vic) requires certain types of contamination to be notified to the EPA by the person in management or control of the land, called notifiable contamination. Under the *Environment Protection Act 2017* (Vic), you have a duty to notify EPA as soon as you become aware or ought to have been aware of notifiable contamination.

The thresholds and descriptions of notifiable contamination are defined in Part 2.1 of the *Environment Protection Regulations 2021* (Vic) and include the following areas that may be notifiable:

- Soil contamination, including if it has moved or is likely to move onto adjacent land
- Friable asbestos in or on soil
- Actual or likely contamination of groundwater or surface water that is being used or may be used
- Presence of any non-aqueous phase liquid in soil, surface water or groundwater
- Soil vapour contamination above certain thresholds
- On site retention of soil (other than fill material) from contaminated land sourced on-site that is not an activity for which an environmental permission is required

Please refer to the *Environment Protection Regulations 2021* (Vic) and EPA for further information and a complete description of notifiable contamination.

Where notifiable contamination is present:

- If the contamination is agreed to be pre-existing to your occupation of VicTrack land, VicTrack will notify the EPA that the land is contaminated
- Where the contamination has been caused or contributed to by you or your organisation (or your predecessor, including by assignment), you must first inform VicTrack of that contamination, and then you will be required to notify the EPA that the land is contaminated. Your OEMP should consider including a process for notification.

Further details surrounding notifications for contamination can be found in *EPA Publication 2008.1 Notifiable contamination guideline: Duty to notify of contaminated land*, found on EPA's website.

Check Controls

Monitoring of the controls you have put in place to prevent risks is important so you can understand if the controls are working as intended.

Environmental inspection

Regular site inspections to monitor the condition of your site can be used to confirm monitoring requirements are being undertaken and check effectiveness of controls. It is recommended this be undertaken as a minimum monthly, where possible, subject to frequency of site use.

Inspections should be documented and recorded, including any actions required to rectify any issues observed or areas of improvement. An example of a general environmental site inspection checklist is provided in **Attachment 3**.

Table 13. Inspections

Inspection	Description
Frequency of inspection to check controls	<input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Other. Please describe:
Who will be responsible for inspections to check controls?	
Where will records of inspections and any areas of improvement be kept/saved?	

Environmental monitoring

Environmental monitoring may be required at your site under a trade waste agreement, your lease agreement, a plan, or external requirements (e.g. EPA permissions or notices). Please outline any monitoring that may be required.

Table 14. Environmental Monitoring

Item	Monitoring Required
<i>E.g. Wastewater / Trade Waste</i>	<ul style="list-style-type: none"> • <i>Where it is to be discharged to sewer, volumes and quality of trade waste must be in accordance with an agreement with the relevant water authority known as a 'trade waste agreement'</i> • <i>The monitoring and reporting required as part of a trade waste agreement should be documented in the OEMP</i> • <i>For wastewater management systems, complying with any requirements of your EPA environmental permission</i>

Item	Monitoring Required

OEMP Training / Induction

Site personnel, (including volunteers, subcontractors etc) or workers who are involved in any of the following activities are to read and understand the relevant requirements of this OEMP, and are to ensure they are informed regarding how to complete their work in a manner that minimises risks of harm, e.g. by implementing the management controls under this OEMP:

- Storage and use of fuels and chemicals.
- Refuelling and fuel storage in bulk tanks.
- Soil and stockpile management.
- Waste management.
- Wastewater Management.
- Surface water and stormwater management.
- Amenity (Noise, odour and dust) management.
- General spill response procedure.
- Site inspections.
- Maintenance of plant and / or equipment.

Training / information is to include:

- Provision of information including this OEMP
- Familiarisation with the management, procedures and controls to prevent harm to the environment and people from site activities, in particular focusing on the employee's area of work and responsibility
- What to do if there is an environmental incident, who to report it to and how
- Monitoring requirements of the OEMP, where relevant to the area of work and responsibility

Records must be kept to ensure that training is up to date.

Attachment 2 of this OEMP includes an induction sign-on sheet. This sign-on sheet is to be kept onsite and readily available for all personnel who engage in activities that require knowledge of risk management and minimisation measures.

Roles and Responsibilities

Role	Responsibility
Tenant	<ul style="list-style-type: none"> • Prepare and keep this OEMP up to date with relevant information regarding activities and control measures. • Implementation this OEMP to ensure compliance with the GED and lease conditions. • Update this OEMP as required to reflect any changes in Site activities, or material amendments made to the lease conditions, legislation or guidelines, the outcomes of any checks, inspections and/or reviews, the outcomes of updated risk assessments or other new information. • Report any incidents, complaints, non-conformances and corrective actions to the Site Owner. • Induct new employees / volunteers / members / site users and contractors onto this OEMP if required and ensure they are aware of their responsibilities when working at the Site. • Operate and maintain any onsite wastewater management systems (i.e. septic tanks) so as to minimise the risk to human health and the environment, and provide the landlord / site owner with any maintenance / service records. • Read this OEMP. Sign onto the induction sheet
VicTrack (where VicTrack is the landowner and landlord)	<ul style="list-style-type: none"> • Provide with this OEMP template to Tenants who are required to prepare an OEMP and require guidance • Provide the Tenant with relevant information held by VicTrack that the Tenant needs in order to fulfil their Duty to Manage contaminated land. This includes any information around identified legacy contamination, and any relevant management plan / requirements.
Relevant Site Personnel and Contractors	<ul style="list-style-type: none"> • Operate in a manner that aligns with the requirements of this OEMP and law • For any construction, development, excavation or other non-routine works at the site, seek approval from VicTrack and develop a task-specific management plan (e.g. JSA or SWMS) with reference to the relevant sections of this OEMP for the required task/contractor • Read this OEMP. Sign onto the induction sheet

Provision of OEMP to VicTrack

On completion of your OEMP, ensure that you provide a copy of the OEMP to VicTrack and/or its leasing agent. VicTrack will review the OEMP and where relevant will provide comment to ensure it meets expectations of VicTrack for your lease and use of VicTrack land.

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Attachment 1: Site Plan

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Attachment 2: Induction register

Sign the below register to acknowledge that you have read and understood the contents of this OEMP.

Name	Company	Signature	Date

Attachment 3: Site inspection checklist

Inspection Register	
Date:	Time:
Name:	Title/role:
Signature:	

Inspection Details

Attribute	Issue observed (Y/N/NA)	Description/comments	Action required (Y/N)
Storage and management			
Is the ground surface sealed and in good condition (e.g. no cracks, staining)?			
All chemicals / fuels / raw materials stored in an appropriate manner in dedicated areas?			
Are all storage containers in good condition, with intact lids, no rust or holes or signs of leakage or spills?			
Are all chemical containers and tanks kept within effective secondary containment?			
Is there a spill kit nearby that contains adequate materials and is well stocked?			
Are drip trays being used and effective in capturing spills when decanting or refuelling?			
Is there any evidence of leaks?			
Is there any evidence of spills?			
Are pits/interceptors/wastewater management systems in good working condition?			
Are stormwater inlets and outlets operating effectively, and no evidence of contaminated water entering?			
Bunds/secondary containment areas appear in good			

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Attribute	Issue observed (Y/N/NA)	Description/comments	Action required (Y/N)
condition? Are they adequate for the materials stored?			
Do any bunds need emptying of accumulated water?			
Containers and storage areas secure and labelled?			
All chemicals/fuels listed in site register?			
Site OEMP is available on site?			
Waste Management			
Are wastes stored in covered bins or skips or stored under cover?			
Is waste being kept to a practicable minimum and disposed of appropriately offsite?			
Are any bins overflowing? Is there any surplus waste, or stockpiled material / soil?			
Are the waste type volumes at any time on-site <5m ³ ? (Waste tyres >5m ³ at any time on-site will require tenant to obtain EPA permissions)			
Are all batteries stored undercover on a sealed surface within secondary containment?			
Training and incidents			
All staff are trained on environmental procedures and inducted to the OEMP?			
No dust is escaping the site?			
Have any environmental incidents occurred, and have they been reported to VicTrack and the EPA?			
Monitoring requirements undertaken, as required (e.g. under trade waste agreement, groundwater monitoring)?			

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Attribute	Issue observed (Y/N/NA)	Description/comments	Action required (Y/N)
Have all environmental permissions and agreements been obtained for the site activities? Are the conditions of these (if any) being complied with?			
Soil stockpile management			
Are soil stockpiles located away from waterways and drainage lines?			
Are surface water flows diverted around stockpiles?			
Are silt screens, geofabric or other suitable materials being used to trap sediment emanating from the base of the stockpile?			
Are all potentially contaminated or contaminated material stockpiles covered with a tarpaulin?			
Are all highly contaminated materials covered and located on impervious ground within secondary containment?			

Action record

Action Item	Person Responsible	Date Action Item completed	Signature