



National Green Steel Ltd  
c/- Shearer Consulting Limited

Attention: Craig Shearer  
[craig@craigshearer.co.nz](mailto:craig@craigshearer.co.nz)

13 May 2025

WWLA1147

## National Green Steel, 61 Hampton Downs Road: Hazardous Substances Assessment

### 1. Introduction

Williamson Water & Land Advisory Ltd (WWLA) has prepared this hazardous substances assessment to support the application by National Green Steel Limited (National Green Steel) for consent under the Fast-Track Approvals Act 2024 for a proposed steel recycling facility at 61 Hampton Downs Road, Hampton Downs, Waikato (referred to as 'the site', location provided in **Figure 1**).

This version of the report replaces the previous report (dated 13 March 2025), following receipt of review comments from Waikato District Council advising that the hazardous substance provisions of the Waikato District Plan: Operative in Part are now operative and therefore these aspects of previous plans no longer need to be considered.



Figure 1. Site Location (source: LINZ 2023-2024).

### 2. Background

National Green Steel propose to develop a steel recycling facility on the site. A preliminary site design and layout is provided in **Appendix A**. We understand that the steel recycling process includes steel reception/ handling (including shredding), a steel melting plant and a rolling mill to process the recycled steel. Associated ancillary facilities include a wastewater treatment plant, an

oxygen plant (with bulk oxygen storage), waste slag processing and storage (with approximately 50% of the slag being recycled and the remainder being disposed of appropriately to a landfill licenced to accept this type of waste). Based on our discussions with National Green Steel, we understand that key elements of the facility as they relate to hazardous substances include:

- Bulk oxygen storage, for use in the electric arc furnace (EAF) plant, billet cutting in the continuous casting plant and for general purpose use in various areas of the steel plant. It is anticipated that the oxygen will be stored in three storage vessels: two buffer tanks each of 50 m<sup>3</sup> storing oxygen in gas form and one bulk liquid oxygen storage tank of 20,000 L water capacity (equivalent to approximately 16,000 m<sup>3</sup> of gaseous oxygen).
- Bulk diesel for the refuelling of onsite mobile machinery used in the handling of steel. This will be stored in an above ground skid mounted tank of 2,000 L capacity, with appropriate secondary containment.
- LPG for use as a fuel in the steel melt shop. This will be stored in a bulk LPG storage vessel of 50,000 L water capacity (equivalent to 25,500 kg of LPG).
- Solid waste that, according to the facility operator, is deemed non-hazardous. This includes slag (in the order of 70 tonnes/day) and scale and sludge (20 tonnes/ day), both of which will be partially recycled (50%) with the remainder disposed of to landfill. Approximately 8 tonnes of non-hazardous dust will be produced from the process facility daily, with all of this being disposed of to landfill.
- Secondary containment will be provided for all liquid bulk hazardous substances, as follows:
  - Bulk tanks will either be self-bunded (double skinned) or within bunded areas.
  - Bunds will be constructed of concrete or steel and will be lined with chemically resistant coating where necessary.
  - Intermediate Bulk Containers (IBCs), if stored outside will be stored in covered and bunded areas, and if inside will either be bunded or on drip trays that drain to an area where spills can be recovered. These are most likely to be required for the wastewater treatment plant.
- Stormwater generated in in areas where hazardous substances are stored or used will be collected and diverted for treatment through the onsite wastewater treatment process with disposal of treated wastewater to ground within the site.

A hazardous substances assessment is required to determine the activity status of the hazardous substances proposed to be used at the site under the provisions of Section HAZS – Hazardous substances of the Waikato District Plan (Operative in Part; WDP:OIP; the portions of the hazardous substances section that are not subject to appeal are deemed to be operative), referred to herein as the District Plan.

This document sets out our assessment against the hazardous substances section of the District Plan. This letter has been prepared by a suitably qualified and experienced hazardous substances practitioner. A CV for the assessor is available on request.

### 3. Site setting

The environmental setting is described in **Table 1**. The features of the environmental setting are considered in the context of their potential to affect the distribution, mobility and form of contaminants (if present). These variables set the scene and inform the assessment of risk and effects (**Section 5**).

**Table 1. Environmental setting**

<b>Topography and drainage</b>	<p><i>The topographical nature of the site impacts where hazardous substances might migrate to if split.</i></p> <p>The site is dominated by a broad central gully, with topography steepening to a low ridge line (approximately 40 m RL) in the southeast and east.</p>
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	The Waipapa Stream is located along the western boundary of the site. Stormwater from the site discharges directly to the Waipapa Stream via overland flow and constructed drainage ditches. The Waipapa Stream, which is highly modified, largely now being a drainage channel, ultimately discharges to the Waikato River some 3.5 km to the north of the site.
<b>Surrounding land use</b>	The site is located in a mixed-use area. Farmland borders majority of the site, but a motorsport park is located immediately to the north (beyond Hampton Downs Road), a prison some 500 m to the south, a regional landfill to the west (some 1300 m) and State Highway 1 to the east (some 400 m) of the site.
<b>Hydrogeology</b>	<p><i>Hydrogeological conditions affect the potential for hazardous substances to enter and be transported in groundwater.</i></p> <p>Bore logs from NZGD<sup>1</sup> and Wells NZ<sup>2</sup> confirm nearby boreholes encountered clays, sands, silts, siltstones and peats. The information indicates that groundwater was encountered in nearby boreholes between approximately 1 and 3 m below ground level (bgl). Groundwater is expected to be at shallow depth (near surface) in lower parts of the site, however it is likely to be deeper beneath the higher parts of the site.</p>
<b>Sensitive receptors</b>	<p><i>Sensitive environmental receptors could include aquatic or terrestrial ecosystems. This is not an ecological assessment but is instead an initial review of the surrounding environment to assess where contaminants (if present) on the site could migrate to and affect.</i></p> <p>There may be sensitive aquatic and terrestrial ecosystems associated with the Waipapa Stream.</p> <p><i>Sensitive human receptors could for example be children at a school or kindergarten on or adjacent to a site. Workers on industrial land (including or adjacent to a site) would be considered less sensitive.</i></p> <p>The surrounding land comprises principally farmland and commercial operations. Worker at and users of these facilities are not considered to be sensitive with respect to the site. While residents of surrounding farms would typically be considered to be sensitive receptors they are located at significant distance (&gt;200 m) in this instance and are therefore unlikely to be impacted by hazardous substances derived from the site.</p>

## 4. Hazardous Substances Assessment

### 4.1 Waikato District Plan: Operative in Part

***The facility is likely to be considered a “Significant Hazard Facility” under the WDP:OIP, meaning that a Discretionary consent status will apply. An Environmental Management Plan (EMP) will be required and is anticipated to be prepared as a condition of consent when site plans are more developed.***

As described in **Section 2**, hazardous substances will be stored, handled and used at the proposed facility. While quantities are yet to be confirmed, indicative quantities are summarised in Error! Reference source not found.. The primary hazardous characteristics of the substances are flammability and ability to oxidise.

As the final form and layout of the recycling plant is subject to detailed design we have made the following assumptions for the purposes of this assessment:

- The site is zoned Rural under both plans and will not change as part of the current proposal.
- Hazardous substances located on the site will be placed greater than:
  - 50 metres from the nearest water body.
  - 50 metres from the nearest boundary. Preliminary site plans show that the main plant areas will be located greater than 350 m from the nearest existing residence.

<sup>1</sup> Sourced from NZGD Webmap. <https://www.nzgd.org.nz/arcgismapviewer/mapviewer.aspx>

<sup>2</sup> Sourced from Wells NZ Webmap <https://wellsnz.teurukahika.nz/wells/map>

- The facility will treat stormwater from areas where liquid hazardous substances are stored to a standard suitable for discharge to the receiving environment.
- Smaller quantities of chemicals used at the facility, such as cleaning products or maintenance oils etc., are expected to be stored indoors at levels below the thresholds specified in the District Plan. On this basis these substances have not been assessed further.

Under the WDP:OIP, the facility will meet the definition of a “significant hazardous facility” as the volume of LPG storage will exceed 6 tonnes. On this basis, the storage and use of hazardous substances will be a Discretionary Activity (Rule HAZS-R2). An assessment against the requirements of Rule HAZS-R2 are set out in **Table 2**.

**Table 2. Assessment against Rule HAZS-R2 of the WDP:OIP**

Standard	Criteria for assessment	Assessment
HAZS-R2 The storage, handling or use of hazardous substances in a significant hazard facility	a) Risk assessment comprising (abbreviated): the probability and consequence of an accident leading to the release or loss of control of hazardous substances, potential risks and effects on people and neighbouring activities, potential risks and effects on natural ecosystems, potential risks on sites of significance to tangata whenua, potential for natural hazards to impact operation, potential for cumulative adverse effects.	An interim risk assessment, provided in <b>Appendix B</b> , covers the relevant matters raised. Overall, the risk of the facility is likely to be low with the use of structural (engineering) and management controls. The risk assessment will be updated on completion of detailed design.
	b) Alternative locations: An assessment of alternative locations, having particular regard to locations both within the site and outside the site	Locations have been chosen within the site to achieve the greatest set back from site boundaries and more sensitive land users/ ecological receptors, while also being practical for site use such that transport of hazardous substances is minimised. Storage of hazardous substances outside the site boundary would be impractical and result in wider potential effects.
	c) Records for existing activity	Not applicable

As above, the risk assessment in **Appendix B** show that the potential risks can be managed via structural (engineering) and management controls. These will be set out in an EMP that we expect will be prepared as a condition of consent.

#### 4.2 Health & Safety at Work (Hazardous Substances) Regulations 2017

As noted above, the storage of 25,500 kg of LPG and 16,100 m<sup>3</sup> of oxygen on the site will also trigger the requirement for a **Location Compliance Certificate** under the Health & Safety at Work (Hazardous Substances) Regulations 2017. As a Location Compliance Certificate is issued by a Compliance Certifier, this provides independent confirmation that a variety of controls around hazardous substances are in place. These controls include: emergency management (including spill response), control of ignition sources, worker training and information provision, secondary containment, fire detection and response, notification to WorkSafe, compliance with minimum separation distances from protected and public places, establishment of hazardous atmosphere zones. These controls are intended to either prevent the unintended release of the substances or reduce the effects on people and the wider environment if a release were to occur.

### 5. Assessment of Risk and Effects

We provide the following assessment of risk and effects related to the proposal. The hazard identification and risk assessment processes are further detailed in **Appendix B**.



## 5.1 Location, design and management

As described in **Section 3** and shown in **Appendix A**, the facility will be located in a predominantly rural area and the size of the site ensures that there is adequate room for hazardous substance use and storage to be appropriately separated from waterways, site boundaries and more sensitive land uses.

As described in the preceding sections the facility will be designed to ensure that the effects of discharges of hazardous substances to air, land or water are no more than minor. Design factors will include:

- Location of hazardous substances centrally within the facility, with greatest setback from the site boundaries, where possible.
- Appropriate segregation and separation of incompatible substances and processes.
- Secondary containment will be provided for all bulk hazardous substances.
- Stormwater generated in areas where hazardous substances are stored or used will be collected and diverted for treatment through wastewater treatment system.
- Dedicated unloading areas with unloading of bulk liquids using closed systems designed to minimise the risk of material loss.

With respect to management, as described in the preceding sections, the facility will be operated in accordance with a site-specific EMP which will include training and monitoring requirements, unloading and safe handling procedures, spill response plan, etc. It is proposed that as a condition of consent a site-specific EMP will be prepared for submission to the Waikato District Council (WDC) prior to commissioning.

In summary, we consider that implementing appropriate conditions of consent will ensure that the design and management of the proposed steel recycling facility avoids or adequately mitigates adverse effects, including risks, to people, property and the environment. Proposed conditions of consent are included as **Appendix C** to this assessment.

## 5.2 Risk to people, property and the environment

The risk or harm that a particular event presents is a function of the likelihood of the event occurring and the consequence of the event. The hazard identification and risk assessment processes are further detailed in **Appendix B**, we note the following key points:

- With respect to likelihood - hazardous substances will only be released if there is a spill during unloading of chemicals / filling of tanks or a failure of secondary containment. As described above both engineering (e.g. closed systems, high level alarms etc.) and management (e.g. trained staff, monitoring, spill response procedures etc.) controls will be implemented at the facility. On this basis the likelihood of a release occurring which results in effects beyond the boundary of the facility is expected to be only rare or unlikely, in other words probable only in extraordinary circumstances.
- With respect to consequence - the hazardous substances proposed to be stored and used in bulk at the facility (refer to **Section 3**) generally present a low health risk other than via direct contact or fire/explosion. Other than site workers (whose exposure will be managed via workplace health and safety procedures), the nearest human receptors are located at a significant distance from the site so it is highly unlikely that people will be exposed to discharges of hazardous substances. The pathway for exposure to human receptors (other than site workers) is therefore incomplete except via air or vapour discharges. Air or vapour discharges from hydrocarbons would only be relevant in the context of a fire, but in the unlikely event of a fire the impact will be mitigated by robust fire monitoring and control systems that will be required to be implemented as part of the building consent process.

With respect to potential environmental effects, the substances proposed to be used are generally acutely toxic to aquatic ecosystems. So, a release of large quantities of the

substances would result in significant short-term effects, i.e. die-off of flora and fauna. However, as noted above with appropriate engineering and management controls a release of large quantities of the substances would only be expected to occur in extraordinary circumstances. In addition, the substances typically have a low potential for bioaccumulation and generally attenuate (for example through volatilisation and/or biodegradation) rapidly in the environment so there is limited potential for long-term effects.

In conclusion, as detailed in **Appendix B**, with industry standard controls in place it is very unlikely that hazardous substances will be released from the site, since the consequence of a release is low to moderate, operation of the steel processing facility presents a low risk overall.

### 5.3 Cumulative effects

The steel recycling facility will be located in a rural area, and there are no other facilities anticipated to store and use hazardous substances in the immediate area. The closest facilities that are likely to store bulk quantities of hazardous substances are the workshops associated with the motorsport park, which are located >400 m to the northwest of the site, beyond Hampton Downs Road. As a result, there are not expected to be any cumulative effects from other source of hazardous substances.

As described in the previous sections, small spills will be contained and managed, so there will be no cumulative effects on human health or the environment because of this type of incident.

## 6. Summary and Conclusions

In summary, this assessment has determined that:

- The quantity of hazardous substances proposed to be stored onsite triggers a Discretionary Activity status under Rule HAZS-R2 of the WDP:OIP.
- The controls and measures that will be put in place at the proposed facility mean that the site is expected to comply with the assessment criteria under Rule HAZS-R2 of the WDP:OIP.

In conclusion, we consider that implementing appropriate conditions of consent, and obtaining a Location Compliance Certificate, will ensure that the design and management of hazardous substance storage and use at the proposed facility avoids or adequately mitigates adverse effects, including risks, to people, property and the environment.

## 7. Closure

Please contact the undersigned if you have any queries in relation to this assessment.

Yours sincerely,



**Steve Tyson**  
Hazardous Substances Advisor  
+64 27 3600 533  
[steve.tyson@wwla.kiwi](mailto:steve.tyson@wwla.kiwi)



**Shane Moore**  
Principal Environmental Specialist  
+64 27 445 7323  
[shane.moore@wwla.kiwi](mailto:shane.moore@wwla.kiwi)

## **Appendix A. Preliminary facility layout plan**







## **Appendix B. Risk Assessment**



## HAZARDOUS SUBSTANCES: HAZARD AND RISK ANALYSIS

Date:	March 2025	Project Director:	Shane Moore
Project No.	WWLA1339	Project Manager:	Lauren Windross
Project Name:	National Green Steel – Steel Recycling Facility, 61 Hampton Downs Road		
Client:	National Green Steel Ltd		

The document presents a qualitative assessment of the potential risk of offsite effects associated with the storage and handling of hazardous substances at the proposed steel recycling facility. This assessment has been undertaken in general accordance with the approach set out in WorkSafe's Good Practice Guidelines<sup>1</sup>. As the final form and layout of the facility is subject to detailed design this analysis should be considered preliminary and be updated once final design information is available.

The key elements of this assessment are:

- It is principally limited to an assessment of offsite effects. It is assumed that onsite effects, e.g. exposure to site workers, will be appropriately controlled in accordance with health and safety regulations and associated legislation<sup>2</sup>.
- Hazard identification – this summarises the properties of the substances and identifies key failure modes or pathways by which hazardous substances could be released and may result in potential effects on offsite human or environmental receptors.
- A qualitative risk assessment - the risk or harm that a particular event presents is a function of the likelihood of the event occurring and the consequence (or severity) of the event. The risk assessment matrix set out below has been applied to qualitatively evaluate the level of risk with and without control measures in place.

**In summary, no hazards have been identified that cannot be adequately mitigated through the implementation of industry standard control measures.**

The following colour coding is used throughout this assessment:

- Green shading** indicates low level of hazard, risk or effect.
- Orange shading** indicates moderate level of hazard, risk or effect.
- Red shading** indicates high level of hazard, risk or effect.

Risk Assessment Matrix		Consider the likelihood of a hazardous event occurring				
		Very unlikely to happen	Unlikely to happen	Possibly could happen	Likely to happen	Very likely to happen
Consider the severity of injury/illness	Catastrophic (e.g. fatal)	Moderate	Moderate	High	Critical	Critical
	Major (e.g. Permanent Disability)	Low	Moderate	Moderate	High	Critical
	Moderate (e.g. Hospitalisation/Short or Long Term Disability)	Low	Moderate	Moderate	Moderate	High
	Minor (e.g. First Aid)	Very Low	Low	Moderate	Moderate	Moderate
	Superficial (e.g. No Treatment Required)	Very Low	Very Low	Low	Low	Moderate

<sup>1</sup> WorkSafe New Zealand, 2016. Major Hazard Facilities: Safety Assessment. Good Practice Guidelines. July 2016.

<sup>2</sup> For example: Health and Safety at Work (Hazardous Substances) Regulations 2017.

## HAZARD IDENTIFICATION

Substance	Quantity	Hazard level <sup>3</sup>	Potential failure (release) modes	Exposure pathways	Adopted hazard rating (and rationale)
LPG	25,500 kg	Health	<ul style="list-style-type: none"> <li>Tank leak or rupture during use</li> <li>Fire</li> </ul>	<ul style="list-style-type: none"> <li>Inhalation of substance.</li> <li>Flammable</li> </ul>	Low – as hazard is limited to direct exposure of workers on site
		Environment		<ul style="list-style-type: none"> <li>Substance discharging to air</li> </ul>	Low – as rapidly disperses and biodegrades so effects will be short-term only
Diesel fuel	1,660 kg	Health	<ul style="list-style-type: none"> <li>Spill during filling of tank</li> <li>Tank leak or rupture during use</li> <li>Fire</li> </ul>	<ul style="list-style-type: none"> <li>Dermal contact or ingestion of substance.</li> <li>Flammable</li> </ul>	Moderate – due to potential offsite deposition by fire
		Environment		<ul style="list-style-type: none"> <li>Substance entering waterways, soil or groundwater</li> </ul>	Moderate - due to persistence in environment
Oxygen	16,100 m <sup>3</sup>	Health	<ul style="list-style-type: none"> <li>Tank leak or rupture during use</li> </ul>	<ul style="list-style-type: none"> <li>Flammable</li> </ul>	Low – as hazard is limited to direct exposure of workers on site
		Environment		<ul style="list-style-type: none"> <li>Substance discharging to air</li> </ul>	Low – as naturally occurring and rapidly disperses, no effects likely

## RISK ANALYSIS

Hazard	Potential harm	Risk assessment without controls <sup>4</sup>			Mitigation measures / hazard controls	Residual risk with controls		
		L	S	R		L	S	R
Spill during delivery of bulk liquids (e.g. hose failed, tank overfilled etc.)	Health effects due to dermal contact with, inhalation or ingestion of substance	P	M	H	<ul style="list-style-type: none"> <li>The facility will be operated in accordance with a site-specific Environmental Management Plan (EMP) which will include training, monitoring and maintenance requirements, unloading and safe handling procedures, spill response plan, etc.</li> <li>A containment system will be provided for the bulk chemical delivery area(s).</li> </ul>	VU	O	L

<sup>3</sup> Ministry for the Environment, 2002. Land Use Planning Guide for Hazardous Facilities. A resource for local authorities and hazardous facility operators. A report prepared by the Hazardous Facilities Screening Procedure Review Group in conjunction with the Ministry for the Environment.

<sup>4</sup> L = Likelihood, S = Severity, R = Risk

Likelihood: VU = Very unlikely, U = Unlikely, P = Possible, L = Likely, VL = Very likely

Severity: C = Catastrophic, M = Major, O = Moderate, I = Minor, S = Superficial

Risk ranking: C = Critical, H = High, M = Moderate, L = Low, VL = Very low

Hazard	Potential harm	Risk assessment without controls <sup>4</sup>			Mitigation measures / hazard controls	Residual risk with controls		
		L	S	R		L	S	R
	Environment effects due to large volumes of substance entering waterways, soil or groundwater	P	C	C	<ul style="list-style-type: none"> <li>Where possible unloading of bulk liquids will be undertaken using closed systems designed to minimise the risk of material loss. Tanks will also be fitted with overpressure vents, liquid level indicators and high-level alarms.</li> <li>Stormwater generated in in areas where hazardous substances are stored or used will be collected and diverted for treatment through the water treatment system.</li> <li>Hazardous substances will be located centrally within the facility, with greatest setback from the site boundaries, where possible.</li> </ul>	VU	M	L
Leak from or rupture of bulk tank during use	Health effects due to dermal contact with, inhalation or ingestion of substance	U	M	M	<ul style="list-style-type: none"> <li>The EMP, stormwater and location controls set out above will be implemented in relation to operation of the bulk tanks. In addition:</li> <li>Bulk tanks will either be self-bunded (double skinned) or within bunded areas with bunds constructed of concrete and lined with chemically resistant coating where necessary.</li> </ul>	VU	O	L
	Environment effects due to large volumes of substance entering waterways, soil or groundwater	U	C	M		VU	M	L
Spill during unloading of packaged liquids (e.g. IBC dropped and punctured or ruptured etc.)	Health effects due to dermal contact with, inhalation or ingestion of substance	P	O	M	<ul style="list-style-type: none"> <li>Refer to the controls described in relation to delivery of bulk liquids.</li> <li>IBCs will only be moved by trained staff, using appropriate equipment, and within designated areas.</li> </ul>	VU	I	VL
	Environment effects due to substance entering waterways, soil or groundwater	P	O	M		VU	O	L
Leak from or rupture of IBC during use	Health effects due to dermal contact with, inhalation or ingestion of substance	U	M	M	<ul style="list-style-type: none"> <li>IBCs, if stored outside will be stored in covered bunded areas and if inside will either be bunded or on drip trays that drain to an area where spills can be recovered.</li> <li>Stormwater generated in in areas where hazardous substances are stored or used will be collected and diverted for treatment through the water treatment plant.</li> <li>Where possible the IBCs will be located centrally within the facility, with greatest setback from the site boundaries.</li> </ul>	VU	O	L
	Environment effects due to large volumes of substance entering waterways, soil or groundwater	U	M	M		VU	O	L
Fire associated with LPG or diesel spill	Health effects due to exposure to smoke	P	M	M	<ul style="list-style-type: none"> <li>EMP will include procedures for response to fire, including controls such as fire extinguishers.</li> <li>Substances will be appropriately separated / segregated.</li> <li>Refilling will be undertaken by trained delivery contractor.</li> </ul>	VU	O	L



## **Appendix C. Proposed conditions of consent**

The following conditions of consent are proposed in relation to hazardous substance matters:

- 1) The consent holder shall provide copies of Location and Stationary Container Compliance certificates, issued by an authorised Compliance Certifier, to the Council prior to the steel recycling facility becoming operational.
- 2) The consent holder shall prepare an Environmental Management Plan which to be provided for Council approval as part of the building consent application process for the steel recycling facility (or sooner if available).

*Advice note:*

*The purpose of the Environmental Management Plan is to ensure the risks from the site are managed appropriately.*

- 3) The Environmental Management Plan must include, but not be limited to:
  - a) identification of the specific activities conducted on the site;
  - b) identification of potential contaminants associated with these activities, including a Hazardous Substance Inventory and associated Material Safety Data Sheets;
  - c) methods used to contain identified contaminants and prevent them contacting stormwater runoff as far as practicable, and methods to manage environmental risks from site activities;
  - d) a Spill Response Plan;
  - e) accurate site drainage plan(s) showing the location of all site catchpits, containment systems, treatment devices and the discharge point(s) of the site stormwater system;
  - f) an appropriate auditing programme to ensure site performance with all components of the Environmental Management Plan;
  - g) methods for providing and recording staff training.
  - h) an Operation and Maintenance Plan.
- 4) The site must be operated and managed in accordance with the Environmental Management Plan for the duration of the consented activity.
- 5) The Environmental Management Plan must be reviewed and updated after 12 months from the date of commissioning of the steel recycling facility Plant, to ensure all components of the Environmental Management Plan are still relevant.
- 6) The Environmental Management Plan must be kept on site and accessible at all times.
- 7) The Hazardous Substance Inventory, associated Material Safety Data Sheets, and Spill Response Plan must be kept up to date and maintained onsite at all times.
- 8) Suitable spill kits must be made available onsite at all times for the duration of the consented activity.