
OPERATIONAL ENVIRONMENT MANAGEMENT PLAN

Guidance Material

January 2011

FOREWORD

An Operational Environment Management Plan (OEMP) is a 'living' document that identifies the environmental risks (and legal obligations) associated with the day to day operations of a business and specifies the management measures the Operator will implement in order to prevent or minimise the environmental impacts associated with these operations.

Operators at Sydney Metro Airports are assessed and divided into three tiers based on their potential environmental risk. Tier 1 tenants are considered to have potential for significant environmental risk; Tier 2 tenants the potential for moderate environmental risk; while Tier 3 tenants are considered to have potential for minimal environmental risk. This categorisation is based on the nature of the activities undertaken by the tenants and / or their performance in managing their environmental risks in previous years.

The Airport Environment Strategy requires Tier 1 and Tier 2 tenants to prepare Environment Management Plans for their operations.

This Operational Environmental Management Plan guidance material (this Guide) has been developed by Sydney Metro Airports to assist you identify and manage the environmental risks (potential impacts) and legal obligations associated your business operations at Sydney Metro Airports.

This Guide specifies the issues you are required to address in preparing your OEMP. As every business operation is different the common operational activities and impacts used as examples in this Guide may not address the potential environmental issues associated with your business operations.

You are responsible for ensuring;

- a. that the information provided in your OEMP is comprehensive and correct;
- b. the requirements of your final OEMP are communicated to all your staff and sub-contractors;
- c. all the management measures identified in your OEMP are implemented during the course of your operations at the airport; and
- d. the OEMP is reviewed and updated regularly.

All Tier 1 & 2 tenants are required to submit their up to date OEMP to the Sydney Metro Airports Environment Manager.

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DEFINITIONS

Term	Definition
SMA Environment Manager	Sydney Metro Airports Environmental Manager responsible for oversight of the management of environmental matters at the Airport
AEO	Airport Environment Officer responsible for regulation of the Airports Act 1996 and the Airports (Environment Protection) Regulations 1997
OEMP	Operational Environmental Management Plan
the Operator	The Operator includes any person and any entity engaged by them in the course of their operations at the airport (Contractors / Sub-contractors).
SMA	Sydney Metro Airports

ENVIRONMENT MANAGEMENT PLAN

INTRODUCTION

The purpose and the objectives of your OEMP are normally stated in the introduction.

In general the purpose of your OEMP would be to demonstrate that you have;

- identified the environmental risks associated with your operations at the airport;
- assessed the risks; and
- implemented measures to avoid or minimise the risks you have identified.

Your objective in preparing an OEMP would be to communicate your environmental management requirements throughout your organisation and to Sydney Metro Airports and the Airport Environment Officer.

SITE AND OPERATIONAL DETAILS

Following the introduction an OEMP would normally include the operator's details, a description of the site and a brief description of the operations under taken by the organisation. The OEMP would also identify the environmental legislation that applies to the organisation and the environmental management responsibilities of all persons working within the organisation.

Operator details

Provide the following details in your OEMP;

- The name and postal address of your company;
- The full name and postal address of the owner (and the operator) or the company.

Site Description

Include a detailed description of your site including;

- Site features - size, slope, location of drains, location of nearest stormwater drains, vegetation on site;
- Facility features (size, heritage aspects, wash bay, spray booth, under or above ground tanks, chemical store etc)
- A diagram of the site showing the location of the features described above.

Description of Operations

Include a description of the activities that your company undertakes at the airport (e.g. Engine maintenance, parts washing, aircraft washing, and spray painting) and the processes involved in each activity.

Legislative Requirements

Describe the environmental legislation that applies to your operations.

The key environmental legislation that applies to operators at Sydney Metro Airports includes but is not limited to the;

- *Airports Act 1996*
- *Airports (Environment Protection) Regulations 1997*
- *Bankstown (Camden) Airport Statutory Master Plan 2005 – 2035*
- *Bankstown (Camden) Airport Environment Strategy 2010 – 2015*
- *Environment Protection and Biodiversity Conservation Act 1999 and*
- All other relevant environmental legislation, regulations, standards, guidelines and codes of practice

Where an operation involves activities that are not addressed by the above legislation NSW State environmental legislation and other requirements may apply, including the;

- *Protection of the Environment Operations Act 1997* and associated regulations and policies.

Tip: You also describe the environmental legislation that applies to specific activities you undertake in the procedures that you develop for those activities (See Examples 1 & 2, p12)

Responsibility

An OEMP would normally identify the environmental management responsibilities of all persons in the organisation. Common responsibilities for a variety of positions are described below.

Managing Director who is responsible for,

- Ensuring an OEMP is developed; and
- Ensuring appropriate resources are available to implement the OEMP.

Chief Engineer / Section Manager who is responsible for,

- Identifying the environmental risks associated with the activities undertaken at the site;
- Developing measures that mitigate or minimise the identified environmental risks;
- Ensuring that all personnel working at the site receive training in and implement the environmental measures developed to mitigate or minimise environmental risks at the site; and
- Environmental monitoring to ensure that the management measures adopted are effective.

Personnel who are responsible for,

- Assisting the development of measures that mitigate or minimise identified environmental risks;
- Following measures that mitigate or minimise environmental risks;
- Attending environmental training; and
- Reporting environmental incidents that may occur from time to time.

Contractors and sub-Contractors who are responsible for,

- Identifying the environmental risks associated with their activities at the site;
- Developing measures that mitigate or minimise the identified environmental risks;
- Following instructions and implementing measures that mitigate or minimise environmental risks

Note: Remember to identify the person who will be responsible for updating the OEMP and ensuring that it remains current.

GENERAL MANAGEMENT REQUIREMENTS

An OEMP would also address a number of general management requirements. Some of these matters can be addressed within the procedures that are developed to manage the environmental risks associated with the operations. For example, the records that need to be kept and the monitoring and reporting that needs to be undertaken can be specified in documented procedures.

Environmental Awareness and Training

All persons working within an organisation must be aware of their environmental responsibilities and receive training to help them to meet those responsibilities.

Training can take various forms including site induction, toolbox talks and meetings.

The training that you propose to give your staff and persons working at your site as well as the person responsible for ensuring that the training is delivered should be specified in your OEMP.

Tip: A simple table is sufficient for this purpose.

Staff Position (Staff Member)	Training to be provided	Person responsible for ensuring training provided
Mechanic (Steve)	Location of facilities on site including drains Spill Response Waste disposal Chemical storage & disposal Chemical handling Material Safety Data Sheets	Chief Engineer (Bob)

Environmental Management Records

Appropriate records that demonstrate the environmental obligations of an organisation are being addressed and verify the status of those matters must be maintained.

These records include training records, monitoring data, complaint and incident reports, licences and permits as required, waste transfer receipts, fill validation reports and any other relevant documents / reports as required.

Note: The records must be legible and readily interpretable by a third party.

Tip: You can specify what records you will keep and the person responsible for keeping them in the procedures that you prepare.

Monitoring / Auditing

It is a duty of operators on the airport to monitor the environmental consequences of their activities and the activities of other people operating at their site (Refer Regulation 6.05).

Tip: You can describe the environmental inspections and monitoring you propose to undertake, when monitoring will be undertaken and the person who is responsible for the monitoring in your procedures (See Examples 1 & 2).

Reporting

It is a duty of operators on the airport to report the results of their environmental monitoring to the Sydney Metro Airports (Refer Regulation 6.05).

Sydney Metro Airports requires operators to report;

- Environmental incidents; specifically fuel and chemical spills or any incidents that cause, or have the potential to cause, environmental harm
- The results of water, soil, air quality and noise monitoring. *If monitoring identifies that pollution is occurring the operator must notify the AEM of the matter and the actions that will be taken to address it within 5 days of receipt of the information.* See section below on Non-Conformance with Targets; and
- Complaints received regarding environmental matters. See section below on Complaint Handling.

Tip: If you prepare a procedure on how you propose to manage environmental incidents and another on how you propose to manage complaints about environmental matters made to your organisation you can specify who these matters should be reported to in the procedures. You can also specify reporting requirements for air, water, soil and noise pollution in relevant procedures.

Complaint Handling

An OEMP will normally have a documented procedure for managing any complaints that an organisation may receive in relation to environmental matters, and specify who is responsible for investigating, recording and reporting those complaints.

Complaints in relation to noise or pollution made to operators on the airport must be reported to the SMA Airport Environment who will investigate and confirm that the complaints have been satisfactorily resolved.

Non Conformance with Targets

An OEMP will normally document the action an organisation will take in the event they do not achieve specified targets.

Non-conformances with the standards specified in the Schedules to the Airports (Environment protection) Regulations 1997, and the action taken to rectify them, must be documented and reported in your OEMP.

The SMA Environment Manager will investigate to confirm that non-conformances have been satisfactorily resolved.

Tip: You can prepare a procedure that specifies the actions you will take if your monitoring identifies air, water; soil or noise pollution or you can specify these in relevant procedures.

Environmental Incidents and Emergencies

All OEMP include a documented procedure stating how an organisation will respond to environmental incidents and / or emergencies.

It is a requirement that your OEMP identifies any 'abnormal operation' or emergency that could occur as a result of your operations and that would cause environmental harm if they were to occur. Your OEMP must specify the manner in which your organisation will respond to such matters.

All environmental incidents and emergencies must be reported to the SMA Duty Operations Officer (0419 294 432) and the SMA Environment Manager as soon as practicable.

SMA will direct the emergency response and / or provide assistance, as required (i.e. if the matter impacts, or threatens to impact, aviation areas and / or off-airport areas).

SMA will investigate all environmental incidents and emergencies to confirm they have been resolved.

Tip: [SMA Environment Information Sheet – Spill Response Procedure and Spill Response Chart](#) provides advice on spill response and is available on the airport's website.

IDENTIFICATION OF ENVIRONMENTAL IMPACTS & RISKS

All OEMP identify the environmental impacts associated with the organisation's operations and assess the level of risk associated with those impacts. Management strategies that prevent or, where prevention isn't possible, minimise the impacts can then be developed.

This section is designed to help you to identify and assess the environmental risks associated with your operations, so that you can identify the activities that require management strategies in order to protect the environment.

Identification of potential environmental impact

In order to identify the potential environmental impacts associated with your business;

1. List all the operations and activities involved in carrying out your business;
2. Identify what aspect of the environment the activities could interact with; and
3. Identify the potential impact if the activity isn't managed appropriately.

Establishment of environmental risk

In order to establish the level of risk to the environment associated with the potential impacts you have identified use the risk matrix table below to determine;

1. The likelihood that a potential environmental impact will occur, if the activity isn't managed;
2. The consequence to the environment if the impact were to occur; and
3. Assess the level of risk associated with each activity if it isn't properly managed.

Risk Matrix Table

Consequence	Likelihood					
	Practically impossible	Highly Unlikely	Unlikely	Possible	Quite Likely	Common occurrence
Catastrophic	High	Severe	Severe	Severe	Severe	Severe
Massive	Moderate	High	Severe	Severe	Severe	Severe
Major	Low	Moderate	High	High	Severe	Severe
Moderate	Low	Low	Moderate	Moderate	High	High
Minor	Negligible	Low	Low	Low	Moderate	Moderate
Slight	Negligible	Negligible	Low	Low	Low	Low

An understanding of what each of the risk rating means is provided in the Risk Rating table below.

Risk Rating Table

Rating	
Severe	Significant damage, medium to long term or permanent effect, off site and off airport impacts, significant cost to repair (consider cessation of activity)
High	Extensive damage, medium to long term effect, off site and potential off airport impact, moderate to high cost to repair (documented management procedures required)
Moderate	Moderate damage, short to medium term effect, off-site impacts repairable at low to moderate cost (documented management procedures required)
Low	Discernable impact, short term effect, local (on-site) impact only, repairable at little cost (management actions required)
Negligible	No discernable impact, no action required

An example of the potential aspects and impacts associated with a common airport operation and activities is provided in the table below.

Example 1: Assessment of Operational Aspects and Impacts

Operation Activity	Aspect	Impact	Risk Rating			Recommended Mitigation
			Likelihood	Consequence	Risk	
Aircraft Service <i>Degreasing parts</i>	Spill of dangerous goods (fuel, oil, chemical)	Spilt material enters storm water drain causing water pollution	Possible	Moderate	Moderate	Require all work to be conducted over a drip tray with spill response equipment at hand.
		Spilt material enters soil causing soil contamination	Possible	Moderate	Moderate	Require all work to be conducted over a drip tray with spill response equipment at hand.
Aircraft Service <i>Disposal of waste liquids (oil)</i>	Inappropriate storage of waste liquids	Waste liquids leach to soil and water causing water pollution and soil contamination	Quiet likely	Major	Severe	Provide an appropriate container for waste liquids and install on a bunded pallet; train staff in disposal of liquid wastes
	Inappropriate disposal of liquid wastes	Liquid wastes disposed to incorrect waste disposal facility	Unlikely	Major	High	Engage an appropriately licensed waste contractor to collect liquid wastes; retain waste transfer receipts
Aircraft Service <i>Disposal of waste solids</i>	Inappropriate disposal of waste solids	Waste solids disposed to incorrect landfill	Unlikely	Moderate	Moderate	Engage an appropriately licensed waste contractor to collect solid wastes; retain waste transfer receipts.
		Recyclable waste solids not separated	Common	Slight	Low	Provide separate containers for recyclable materials; train staff in separation of recyclable from non-recyclable wastes.

IDENTIFICATION OF MITIGATION MEASURES

When the level of risk associated with each operation and activity undertaken by an organisation has been established, environmental management measures (e.g. procedures and / or mitigating measures) for all activities that have potential impacts can be developed. Those activities assessed as having the greatest risk would normally be addressed in greater detail than those with low or negligible impacts.

The mitigating measures that are developed must be documented; should identify the monitoring that will be undertaken to ensure that the measures are effective; and, the person or persons responsible for ensuring the measure is implemented.

Staff with responsibility for implementing and maintaining the measure must be trained in its requirements.

Tip: The documented measures (or procedures) can also be used to identify the records that will be kept (e.g. Licences and permits or monitoring data that demonstrates the measure is operating effectively).

Documentation of mitigation measures

The environmental protection measures an organisation intends to take can be documented in a variety of ways; written procedures, tables, flow charts, diagrams etc.

Example 2 on the next page is an example of a written procedure and Example 3 is an example of a table of procedures.

Example Environment Management Plan

An example of an OEMP for a small to medium sized maintenance organisation is provided separately.

EXAMPLE 2: Written Procedure

PROCEDURE X.X

Title (Describe the operation that this measure addresses)

1. OBJECTIVE

Describe the aim of the procedure. What are you trying to achieve with the mitigation measures you have developed?

2. LEGISLATIVE REQUIREMENTS

Identify the legislative requirements that affect this operation (e.g. OH&S, Airport (Environment Protection) Regulations 1997 etc).

Tip: This information can found in the [Sydney Metropolitan Airports Environmental Information Sheets](#).

3. PERSONS RESPONSIBLE

Identify the department(s) or person(s) responsible for implementing and maintaining this procedure.

4. PROCEDURE

Describe the measures that will be implemented to avoid or minimise any adverse environmental effects of the operation. Include any monitoring requirements. Identify the documents that may need to be retained in relation to this operation (Licences, Permits, and Monitoring Data).

5. AMENDMENTS

Identify who is responsible for approving amendments to the procedure.

EXAMPLE 3: Procedure Table

PROCEDURE: Describe the operation this procedure addresses		
OBJECTIVE: Describe the aim of the procedure. What are you trying to achieve with the mitigation measures you have developed?		
LEGAL REQUIREMENTS: Identify the legislative requirements that affect this operation (e.g. OH&S, Airport (Environment Protection) Regulations 1997 etc). Tip: This information can found in the Sydney Metropolitan Airports Environmental Information Sheets .		
ACTIVITY	PROCEDURE	RESPONSIBILITY
Describe the activity	Describe the measures that will be implemented to avoid or minimise any adverse environmental effects of the operation. Include any monitoring requirements. Identify the documents that may need to be retained in relation to this operation (Licences, Permits, and Monitoring Data).	Identify the department(s) or person(s) responsible for implementing and maintaining this procedure.
AMENDMENTS: Identify who is responsible for approving amendments to the procedure.		