

Environmental Management Plan

Taha Auto Limited
395 Fitzgerald Road
Drury

April 2025



Document Control

Document Status	Revision Description	Revision Date
Rev 0	For RC Application	10.04.2025

This is a live document and shall be reviewed and amended pending changes to on-site activities that are environmentally relevant. This will include any structural changes to the drainage system, the location and methodology of storing environmentally harmful materials and also the staff structure or management practices. This EMP will be reviewed annually at minimum to ensure that it is relevant to the practices and activities on site at all times.

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Purpose of this Document

The site at 395 Fitzgerald Road, Drury is currently operated by Taha Auto Limited for the dismantling and car storage. This operation is described as a 'high risk' activity under the Auckland Unitary Plan (Operative in Part) 2016.

This environmental management plan (EMP) has therefore been prepared as a guidance document to enable the continuation of the recycling operation whilst ensuring adverse environmental effects associated with the activity are appropriately managed.

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EMP Scope & Statutory Context

Under the Auckland Unitary Plan the use of land for automotive dismantling with an outdoor activity area is considered a high risk industrial and trade activity and is categorised as a controlled activity. The discharge of contaminants from such an activity area is regarded as a discretionary activity.

This EMP has therefore been prepared to demonstrate the management of any potential adverse effects from the activity and discharge.

The scope of the Environmental Management Plan consists of:

1. Site Description
2. Receiving Environment
3. Site Operation
4. Contaminants & Associated Environmental Risks
5. Stormwater Drainage System & Environmental Controls
6. Environmental programmes and systems

This EMP will first and foremost be the responsibility of the site owner/operator – Bashir Rahimi. Bashir will be responsible for updates to the EMP and its dissemination to on-site staff. Bashir will also be in charge of the management of the facility in terms of running training programmes and auditing EMP performance.

1. Site Description

Address	395 Fitzgerald Road, Drury
Legal Description	Lot 3 DP 194356
Zone	Business - Light Industry Zone and Future Urban Zone
Property Area	27,679m ²
Activity Area	22,710m ²

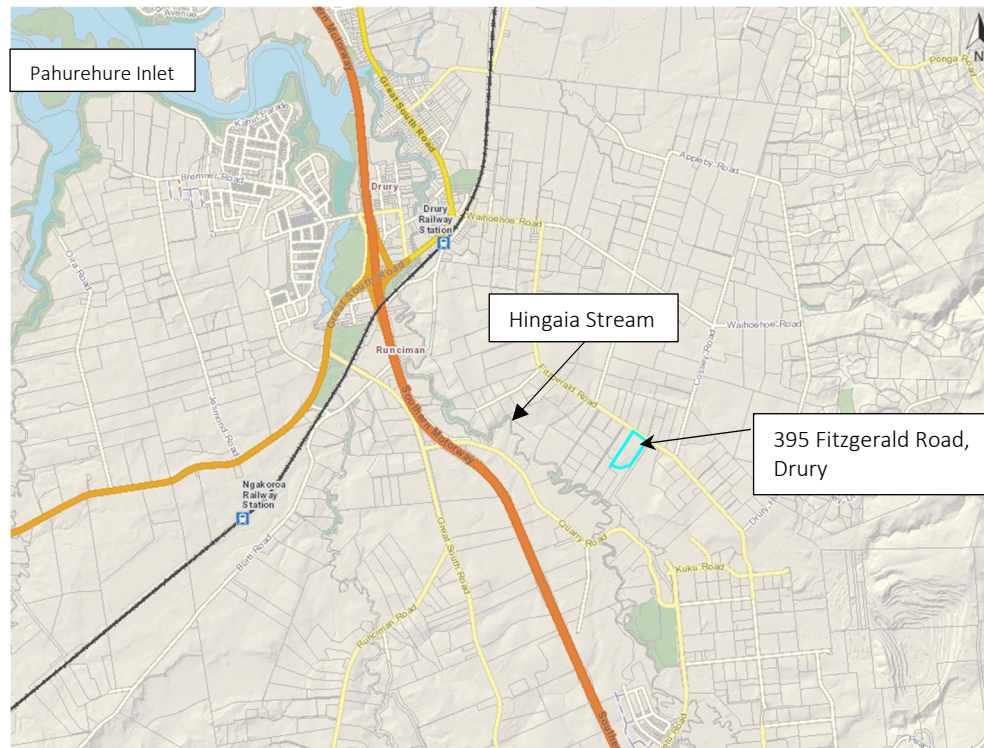


Figure 1: Site Location (Source: Auckland Council Geomaps)

The site is an irregularly shaped 2.7ha rural lot on the south side of Fitzgerald Road in Drury. The eastern half (front) of the site falls gently to Fitzgerald Road and the western half (rear) has a moderate grade to the west falling to a tributary of the Hingaia Stream. The proposed layout will include two 2000m² buildings. One of which will be used for the dismantling and storage (front building) and the second for storage only.

The property relies on roof water and utilises on site wastewater disposal.

2. Receiving Environment, Hydrology and Flooding

The site lies within the Hingaia Stream catchment. Runoff from the western half of the site discharges to a tributary of the Hingaia Stream. Flows from the eastern half discharge to a roadside swale and then into an overland flowpath in the property in the south (411 Fitzgerald) before reaching the Hingaia Stream tributary. The tributary connects with the Hingaia Stream which flows to the Pahurehure Inlet/Manukau Harbour approximately 16 km northwest of the site.

3. Site Operations

Damaged vehicles are brought to site and taken to the dismantling shed. Here they are drained of fluids, engines are removed, and popular items are removed to an inside store. The items are catalogued and made available for online sales. Parts that are not locally sought after and removed and placed within a shipping container for export.

Fuel is removed into small containers and immediately transferred to staff vehicles. Oil and coolant is stored within 1 of two 1m³ containers within a dedicated inside storage area.

Car bodies are typically left largely intact and stored in the yard area.

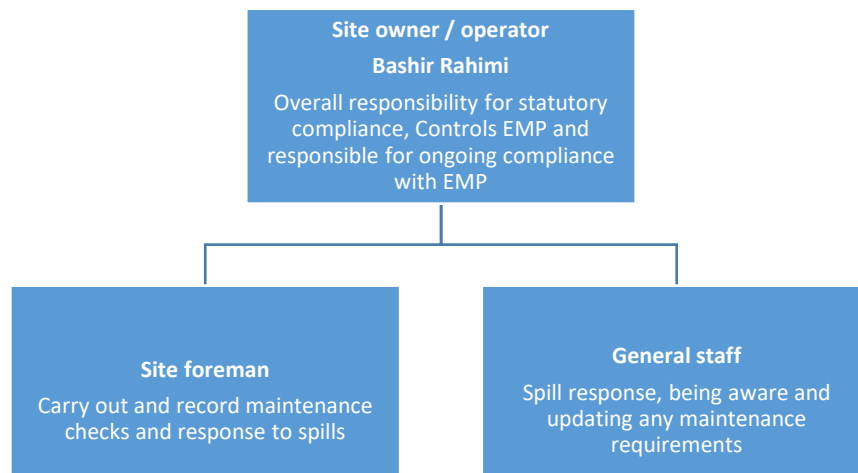


Figure 2: Site Management Structure and Responsibilities

4. Contaminants & Associated Environmental Risks

The predominant contaminants associated with vehicle dismantling and car part storage are listed below. The risk to the environment arise from these contaminants being spilled, dripped or washed on the outdoor yard surfaces where they can then potentially be conveyed to the stormwater system and receiving environment during rain events.

Typical contaminants that may be generated from an automotive dismantling site consist of:

(Source: US EPA Industrial Stormwater Fact Sheet)

- TSS (Total Suspended Solids)
- Petroleum Hydrocarbons
- Heavy Metals
- Ethylene Glycol
- Sulphuric Acid

5. Stormwater Drainage System & Environmental Controls

5.1. *Structural Controls*

To mitigate the effect of increased runoff from the aggregate yard and buildings we have designed an attenuation system to limit peak flows to the predevelopment situation. The 2, 10 and 100 year storm events as well as SMAF stream erosion protection criteria will be addressed. This will be achieved by building a bund around the platform to capture rainfall and release it at a controlled rate via a pipe outlet and weir arrangement. Details of the containment and discharge control devices are included in appendix 1.

The main risk to stormwater quality from the site activities is total suspended sediment and to a lesser degree metals and hydrocarbons. Stormwater treatment will be provided by swale treatment and sedimentation during extended detention within the ponding areas. The swale and extended detention is considered to be best practicable option in this situation.

5.2. *Procedural Controls & Practices*

Procedural controls are the most important part of contaminant control. The stormwater treatment device is last point of defence to avoid contaminant discharge to the environment and will only be truly effective if sensible site procedures are followed to minimise the presence of contamination on the yard surface. Procedural controls include:

- Staff education
- Inspection of parked vehicles for leaks
- Yard surface inspection and maintenance
- Stormwater treatment device inspection and maintenance

Details of these procedural controls are provided in the EMP appendices.

5.2.1. Summary of pollution controls

Risk identification and contaminants of concern		Controls	
Risk	Contaminant(s)	Structural	Procedural
Spills or leaks in yard area	Hydrocarbons, various.	Treatment swales	Staff training All cars drained on arrival
Sediment generation in yard	Total suspended solids	Clean aggregate yard surface. Treatment swales, extended detention	Yard maintenance to keep good clean aggregate cover. Swale and outlet structure maintenance.

Table 2.1: Summary of structural and procedural controls

6. Environmental programmes and systems

6.1. *Inspection and maintenance programme*

Inspection and maintenance of the site and all environmental controls will be undertaken on a regular basis. Inspections will include the yard area and stormwater treatment swales and stormwater outlet control structure. Inspections shall be recorded. Inspection templates are included in appendix 5.

6.2. *Stormwater management programme*

The stormwater management programme will include the upkeep treatment swales and stormwater outlet control structure. An operation and maintenance programme is included as appendix 6.

6.3. *Training programme*

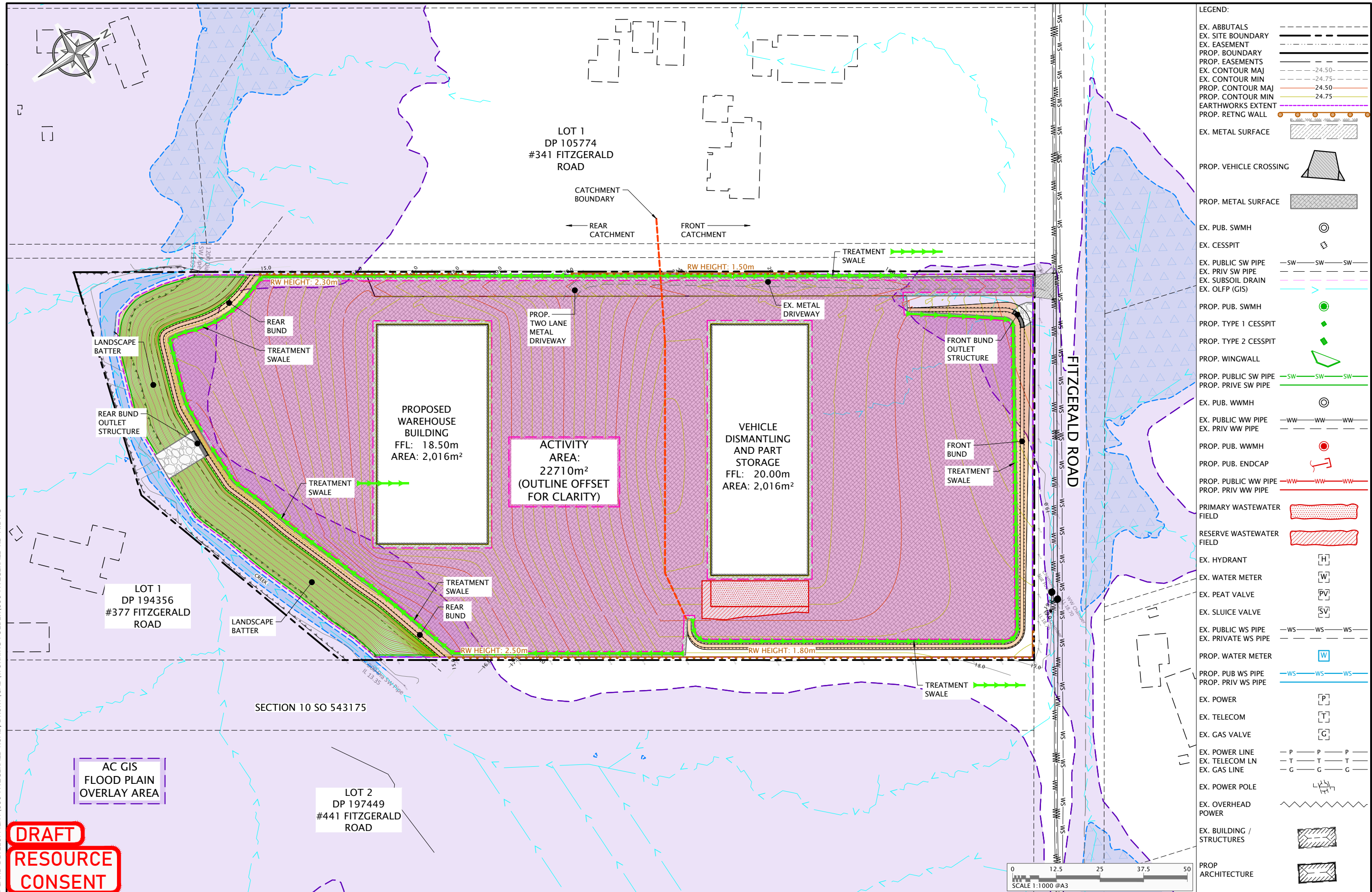
Training will commence with the induction of all new employees to the requirements of the EMP and regular refresher instructions undertaken for all aspects of spill control and stormwater system maintenance. EMP refresher training will be undertaken on an annual basis. A training schedule has been included in appendix 4 to record when training has taken place.

6.4. *Record keeping*

Records shall be kept for all incidents, training sessions and maintenance procedures undertaken that are relevant to the environmental management of the site. These records shall be kept within a dedicated EMP checklist folder within the Taha administration office.

Appendix 1: Site Layout and Drainage Plans

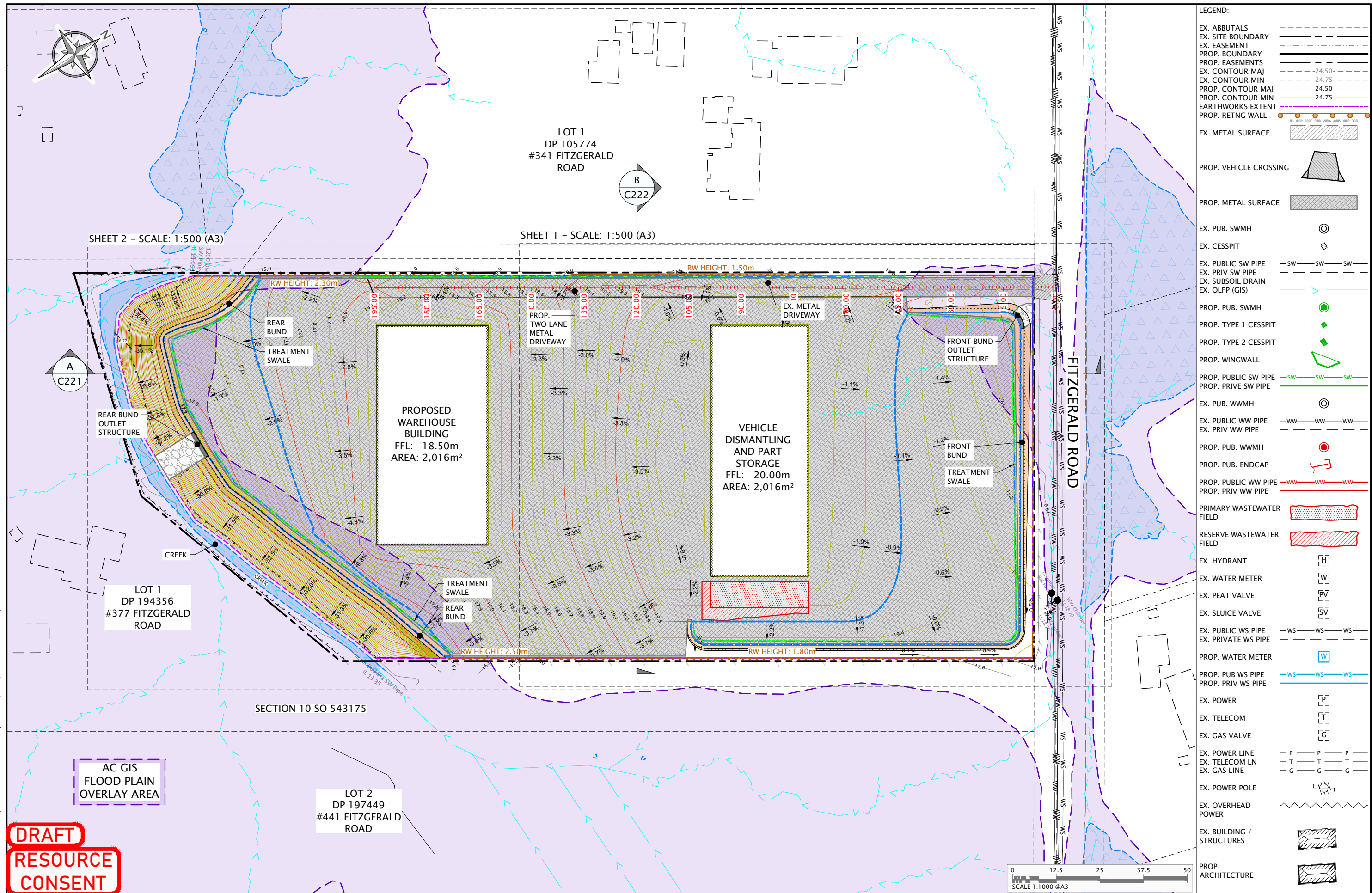
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DRAFT
RESOURCE
CONSENT

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A	INITIAL ISSUE	18/09/24	JDT	TAHA AUTO LIMITED	395 FITZGERALD ROAD, DRURY, AUCKLAND	SITE LAYOUT PLAN	MT	LH	JDT
							APPROVED BY:	ORIGIN:	
							MT	18 SEPTEMBER 2024	
							PROJECT NUMBER:		
							395 FITZGERALD RD		
							SCALE (@A3):	DRAWING NO.	REVISION:
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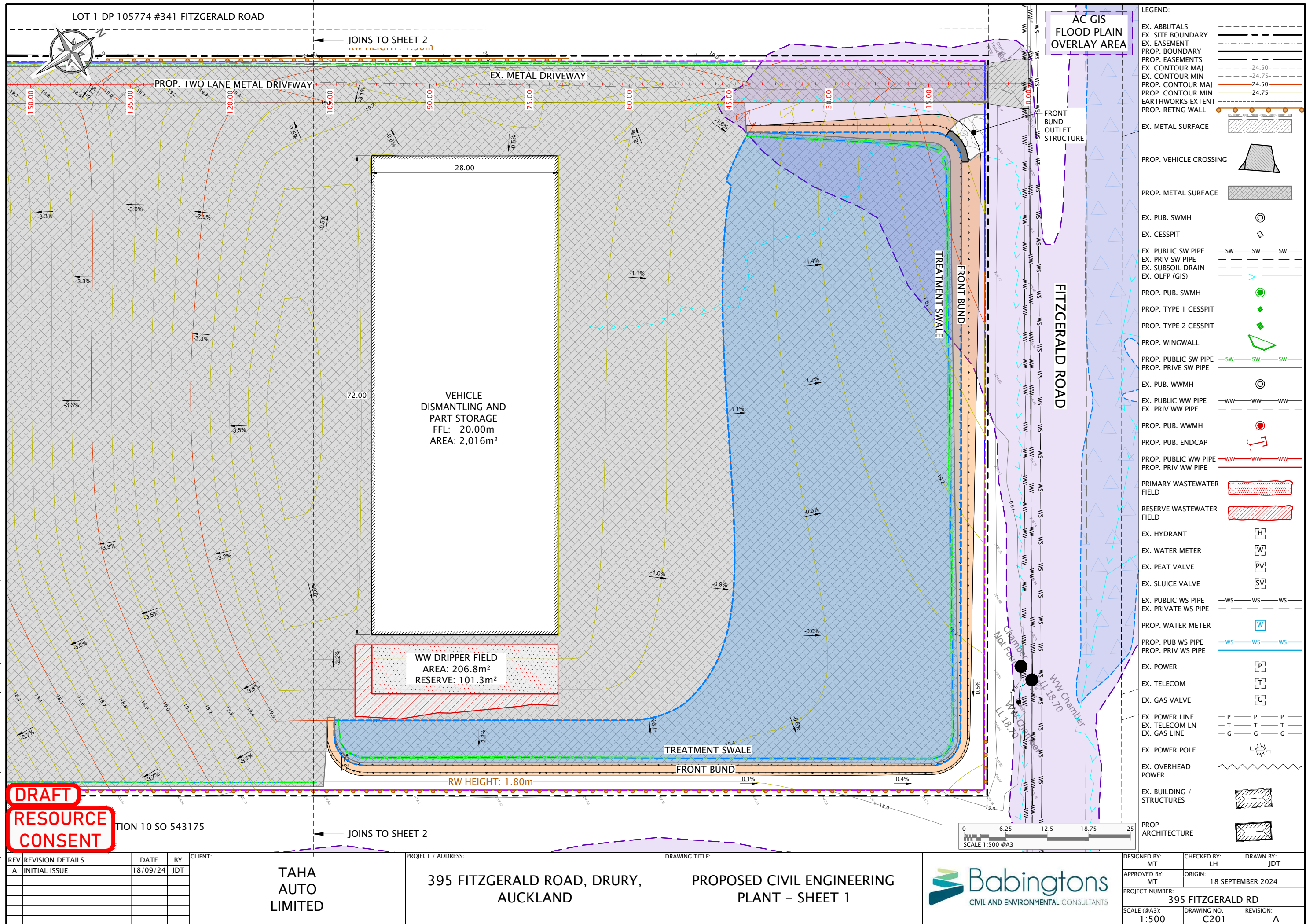
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EX. SITE BOUNDARY	---
PROP. BOUNDARY	---
PROP. EASEMENTS	---
EX. CONTOUR MAJ	---24.50---
EX. CONTOUR MIN	---24.75---
PROP. CONTOUR MAJ	---24.50---
PROP. CONTOUR MIN	---24.75---
EARTHWORKS EXTENT	---
PROP. RETNG WALL	---
EX. METAL SURFACE	---
PROP. VEHICLE CROSSING	---
PROP. METAL SURFACE	---
EX. PUB. SWMH	---
EX. CESSPIT	---
EX. PUBLIC SW PIPE	---SW---SW---SW---
EX. PRIV SW PIPE	---
EX. SUBSOIL DRAIN	---
EX. OLFP (GIS)	---
PROP. PUB. SWMH	---
PROP. TYPE 1 CESSPIT	---
PROP. TYPE 2 CESSPIT	---
PROP. WINGWALL	---
PROP. PUBLIC SW PIPE	---SW---SW---SW---
PROP. PRIVE SW PIPE	---
EX. PUB. WWMH	---
EX. PUBLIC WW PIPE	---WW---WW---WW---
EX. PRIV WW PIPE	---
PROP. PUB. WWMH	---
PROP. PUB. ENDCAP	---
PROP. PUBLIC WW PIPE	---WW---WW---WW---
PROP. PRIV WW PIPE	---
PRIMARY WASTEWATER FIELD	---
RESERVE WASTEWATER FIELD	---
EX. HYDRANT	[H]
EX. WATER METER	[W]
EX. PEAT VALVE	[PV]
EX. SLUICE VALVE	[SV]
EX. PUBLIC WS PIPE	---WS---WS---WS---
EX. PRIVATE WS PIPE	---
PROP. WATER METER	[W]
PROP. PUB WS PIPE	---WS---WS---WS---
PROP. PRIV WS PIPE	---
EX. POWER	[P]
EX. TELECOM	[T]
EX. GAS VALVE	[G]
EX. POWER LINE	---P---P---P---
EX. TELECOM LN	---T---T---T---
EX. GAS LINE	---G---G---G---
EX. POWER POLE	---
EX. OVERHEAD POWER	---
EX. BUILDING / STRUCTURES	---
PROP ARCHITECTURE	---

REV	REVISION DETAILS	DATE	BY	CLIENT:	PROJECT / ADDRESS:	DRAWING TITLE:	DESIGNED BY:	CHECKED BY:	DRAWN BY:
A	INITIAL ISSUE	18/09/24	JDT	TAHA AUTO LIMITED	395 FITZGERALD ROAD, DRURY, AUCKLAND	PROPOSED CIVIL ENGINEERING OVERALL PLAN	MT	LH	JDT
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							MT	18 SEPTEMBER 2024	
							PROJECT NUMBER:		
							395 FITZGERALD RD		
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REV	REVISION DETAILS	DATE	BY
A	INITIAL ISSUE	18/09/24	JDT

CLIENT:

TAHA
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LIMITED

PROJECT / ADDRESS:

395 FITZGERALD ROAD, DRURY,
AUCKLAND

DRAWING TITLE:

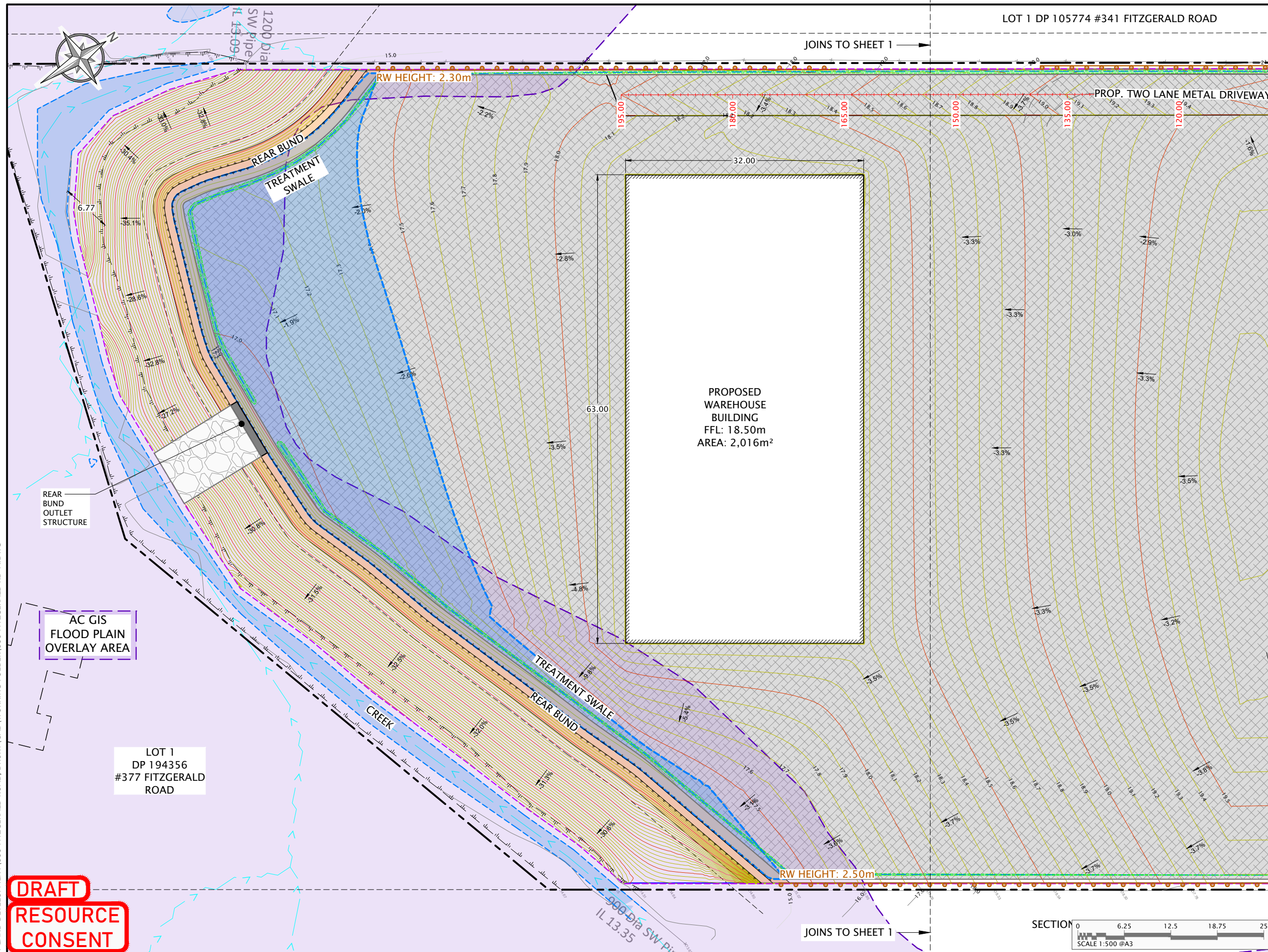
PROPOSED CIVIL ENGINEERING
PLANT - SHEET 1

Babingtons
CIVIL AND ENVIRONMENTAL CONSULTANTS

DESIGNED BY: MT	CHECKED BY: LH	DRAWN BY: JDT
APPROVED BY: MT	ORIGIN: 18 SEPTEMBER 2024	
PROJECT NUMBER: 395 FITZGERALD RD		
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PRINTED ON: 16/10/2023

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LEGEND:

- EX. ABUTTALS
- EX. SITE BOUNDARY
- EX. EASEMENT
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A	INITIAL ISSUE	18/09/24	JDT	TAHA AUTO LIMITED	395 FITZGERALD ROAD, DRURY, AUCKLAND	PROPOSED CIVIL ENGINEERING PLANT - SHEET 2	MT	LH	JDT
							APPROVED BY:	ORIGIN:	
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							PROJECT NUMBER:		
							395 FITZGERALD RD		
							SCALE (@A3):	DRAWING NO.	REVISION:
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Appendix 2: Emergency Spill Response Plan

All spills are likely able to be contained on-site, subject to the following procedure:

1. Always use the personal protective equipment (PPE) stored in the spill kit.
2. Use socks or booms in the spill kit to arrest the spread of the spill and absorbent material to soak up the spilt liquid.
3. If the spill enters the stormwater system check the yard sumps and have any trapped contaminants removed by vacuum truck. Check filtration system and have serviced if necessary.
4. Bag the used absorbent material and store in the outdoor chemical storage area until it can be collected by the waste contractor.
5. Record the spill incident in the register attached to this response plan.

The following additional measures are to be followed in the event of a **significant spillage** on site (considered as more than 20 litres).

1. Establish spill size and any associated hazards.
2. If necessary switch off all electrical power to the site.
3. Attempt to contain the spill and prevent it from entering the stormwater system - utilise *spill absorbent drain & cover mats* contained in the spill kit.
4. Notify all customers and staff and request that no vehicles be started.
5. Phone the Fire Brigade. Dial 111 and explain the situation.
6. Follow the directions of the Fire Brigade.
Note: *When the Fire Brigade has been called to a spill site, their procedures include notification to the Council and Hazardous Substances Inspector.*
7. Evacuate the staff and customers from all areas of the store and ask them to proceed to the assembly point.
8. Eliminate all sources of ignition.
9. Close off the site using the hazard warning tape.
10. Call waste removal contractor to clean up and dispose of spillage.
11. Phone the site owner/operator.
12. Advise the Auckland Council pollution hotline – p. (09) 377 3107
13. Identify emergency equipment that may need to be replenished or replaced and arrange to have that done. Refer to spill kit contents list. Have stormwater devices emptied and serviced.

Appendix 3: Environmental Incident Register (To be copied and used as required)

Date	Description of Incident	Description of Response	Signature

Appendix 4 - Staff Training Programme

Training topic	Summary of training purpose and content	Recipients (specify job titles of relevant staff and/ or contractors)	Frequency or target date
Induction to EMP	Overview of EMP including site information, pollution risks and controls	All staff / contractors	At beginning of employment / contract
Refresher for EMP	Refresher overview of EMP including recent changes and updates	All staff / contractors	One year after employment or contract commences, or more frequently if required
Emergency spill response plan	Identification of on-site 'environmentally hazardous substances' and required spill response (as per SRP in appendix 2 of EMP)	All staff / contractors	At beginning of employment / contract and then 3 monthly
Inspection and maintenance programme training			
Yard and drainage inspections	Inspections for spills, Stormwater outlet clearance.	All staff	At beginning of employment
Spill Kit check	Spill kit contents review	All staff	At beginning of employment
Stormwater treatment device and 'Stormwater management and maintenance programme'			
Training on function and inspection swales and outlet control structure	How the devices work, how to check when maintenance is required	All staff supervisors	At beginning of employment / contract and at 6 monthly intervals

Appendix 5: Maintenance and Inspection Procedure

Area	Procedure	Frequency	Response
Yards	Inspect yard areas for spills and leaks from vehicles, as well as general rubbish and accumulated sediment. Check for damage to yard/muddy areas.	Monthly	If spills or leaks present, use absorbent from spill kit to soak up fluid and dispose correctly to clean up and resolve source. Remove rubbish from yard. Top up yard with fresh aggregate
Swales	Check for accumulated rubbish. Check for erosion. Check for surface water ponding	Monthly and post storm	Remove rubbish. Add topsoil to low or eroded areas and resow.
Stormwater Outlet	Check for pipe or spillway blockage. Check for erosion at outlet.	Monthly and post storm	Clear blockages. Place additional rock if erosion present.
Spill Kit	Check that the spill kit is fully stocked as per contents printed on underside of lid	Monthly or after use of the spill kit	Restock or reorder as required

Appendix 6: Stormwater Device Sizing, Details and Operation & Maintenance Plans

Stormwater - Inspection and Maintenance Schedule

NB: All items to be inspected weekly and post storm events. The information can be kept on an electronic spreadsheet or hard copy.

Location:		Inspected by:	
Consent Number:		Date:	
Item	Inspection instructions	Item condition and actions taken	
Stormwater control bunds	Check for signs of erosion and stabilise as required.		
Swale channel	Check for healthy grass cover, ponding and erosion. Top up hollows where ponding is occurring or erosion areas with topsoil and resow.		
Outlet control structure	Check outlet pipe and spillway slots for structural integrity and blockage. Clear blockages or repair components as necessary. Check for erosion of spillway or downstream. Add rip rap if required.		

Appendix 7: Hazardous Substances Inventory and Material Safety Data Sheets

Hazardous Good	Volume	Location
Diesel	<1000L	IBC in workshop
Petrol	<1000L	IBC in workshop

Note: All chemicals to be stored in the workshop in watertight containers.

Appendix 8 – Stormwater Monitoring Programme

Frequency

Stormwater sampling is to be undertaken on a quarterly basis

Sampling Locations

Two grab samples shall be taken at the low flow outlet pipe at each the stormwater outlet control structure

Sampling Analytes

Samples will be tested for the following parameters:

- PH
- Total Suspended Solids (TSS)
- Dissolved heavy metals (copper, lead, chromium, nickel and zinc)
- Poly aromatic Hydrocarbons (PAH)
- Total petroleum hydrocarbons (TPH)

The results shall be compared ANZECC Guidelines at an appropriate trigger value for freshwater

If contaminant concentrations exceed the guideline levels, accounting for reasonable mixing, the Auckland Council compliance team shall be notified and actions will be undertaken to achieve compliance. All test results shall be kept and incorporated into the annual compliance report that will be made available at the request of Auckland Council.