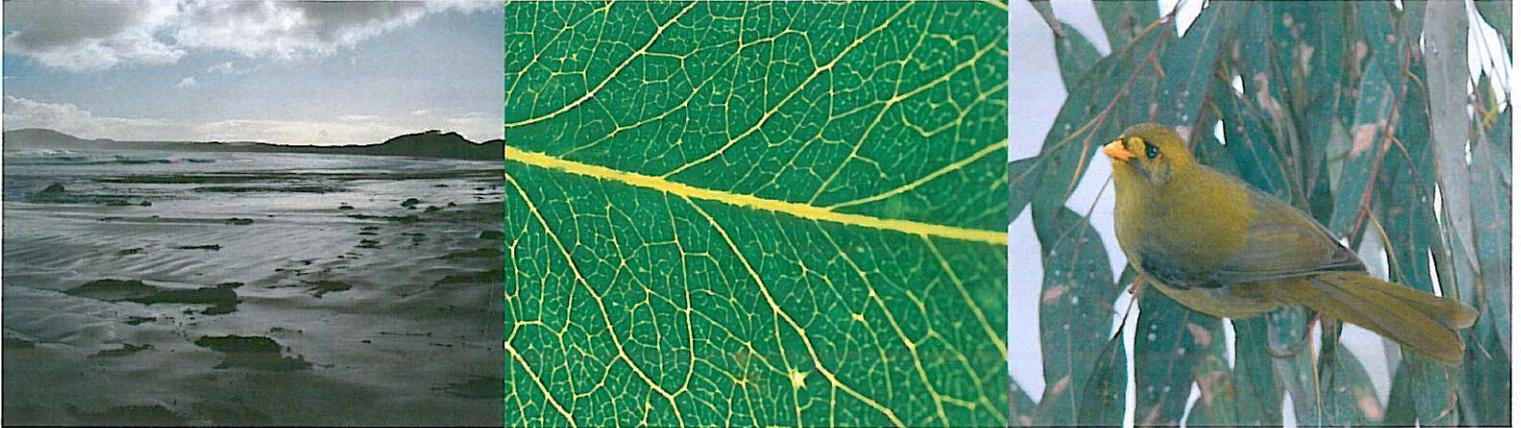




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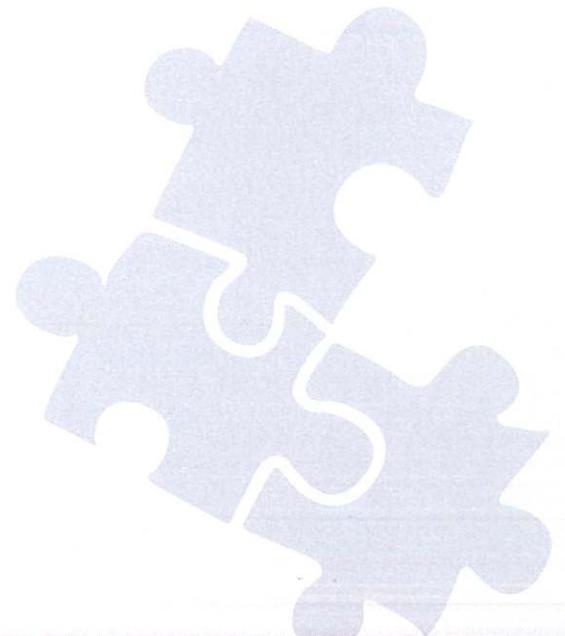


## Environmental Audit

Clyde Transfer Terminal

Veolia Environmental Services  
Corner of Unwin and Shirley Streets,  
Roeshill, NSW 2142

12<sup>th</sup> August 2008

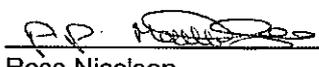
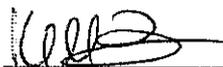


**VEOLIA ENVIRONMENTAL SERVICES AUSTRALIA PTY LTD**ENVIRONMENTAL AUDIT – CLYDE TRANSFER TERMINAL

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**Clyde Transfer Terminal**

322 Parramatta Road, Clyde, NSW

*Prepared for:***Veolia Environmental Services  
Australia Pty Ltd**Corner of Shirley and Unwin Street  
Rosehill NSW 2142*Prepared by:***OTEK Australia Pty Ltd**Level 4, 384 Eastern Valley Way  
Roseville NSW 2069  
Tel: (02) 9417 4499, Fax: (02) 9417 2314Issued: Draft: 29 July 2008  
Final: 12 August 2008Auditor:   
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Senior Environmental Scientist**DISTRIBUTION:**CLIENT: Original, 2 x Copy (3 x CD-ROM)  
OTEK: 1 Copy**LIMITATIONS:**

THIS DOCUMENT IS SUBJECT TO LIMITATIONS NOTED

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## EXECUTIVE SUMMARY

OTEK was engaged by Veolia Environmental Services Australia Pty (Veolia) to conduct an environmental compliance audit of the Clyde Transfer Terminal (CTT) in Parramatta Road, Clyde, NSW. The site has operated for approximately four years. The audit was commissioned to satisfy a requirement of the Conditions of Development Consent (CODC) that was issued for the facility, and covered the period 16<sup>th</sup> January 2007 to 15<sup>th</sup> January 2008. The audit identified the level of compliance with the Conditions of Development Consent, and considered the effectiveness of the environmental management practices at the site.

In the audit period, the CTT received approximately 406,624 tonnes of class 1 solid wastes. The CODC list 137 specific requirements (Conditions) that the CTT must comply with. In April 2007, a notice of amendment (Document number MOD-133-11-2006) was issued with 22 new amendments deleting, replacing, or altering existing conditions. The amendment document states that the development consent is modified by document number MOD-133-11-2006, and was released in April 2007, covering this audit period. While the new odour management system was not commissioned during this period, the audit was conducted against the original CODC and the MOD-133-11-2006 amendments, where applicable. Where ambiguity exists as to the applicability of each condition (if amended), a comment is included in the audit notes.

Of the 137 Conditions in the initial CODC, four were deleted, 14 were replaced, and three were amended, resulting in 133 auditable conditions. Of these 133, 45 were not relevant or auditable. Of the 88 audited Conditions, the CTT was found to be in compliance with 75 Conditions, largely compliant with 9 Conditions and non-compliant with 4 Conditions.

The two major non-compliant Conditions related to the volume of waste accepted on-site (Condition 9) and the annual noise assessment of all trucks (Condition 112). Two minor non-compliances related to odour control in the warehouse (Condition 75), and reporting monitoring results outside of annual reporting (Condition 77).

With respect to the major non-compliances, Veolia has addressed both in full. The exceedence of accepted waste volumes related to the temporary closure of the WSN facility in Auburn and was fully disclosed to the Department of Environment and Climate Change (DECC), who issued a written warning, and the Department of Planning (DoP), who issued a small fine. They have also undertaken a number of studies in order to identify a way of achieving compliance with Condition 112 and continue to liaise with the DECC and DoP with respect to this Condition (112). A modification to Condition 112 is being sought in the near future, to enable compliance with this (or an equivalent) Condition.

Whilst most Environmental Management Plans (EMPs) were found to be fully and effectively implemented, the following three EMPs were less than 100% compliant with stated objectives:

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- Waste Management Plan (Unapproved loads);
- Traffic Management Plan (Right turns from Parramatta Rd); and
- Noise Management Plan (Truck noise monitoring).

The less than complete effectiveness of these EMPs was known to Veolia, and in all instances remedial works or other initiatives were being implemented to address these shortcomings.

## **1 INTRODUCTION**

Veolia Environmental Services Australia Pty Ltd (Veolia) owns and operates the Clyde Transfer Terminal (CTT) at 322 Parramatta Road, Clyde, NSW. Under the new NSW DECC Waste Classification Guidelines, the facility accepts general solid wastes (putrescible and non-putrescible). These wastes are received in an enclosed building and compacted into custom modified shipping containers for transport by rail to the Veolia bioreactor landfill at Woodlawn, approximately 250km south-east of Sydney.

In July 2008, OTEK conducted an environmental compliance audit of the CTT. The audit included a detailed site inspection and site interviews on the 8<sup>th</sup> and 9<sup>th</sup> of July 2008. The purpose of the environmental audit of the site activities and operations was to assess compliance with the *Clyde Transfer (Special Provisions) Act 2003*. That Act granted development consent for the CTT, subject to conditions set out in the document entitled *Clyde Transfer Terminal – Conditions of Development Consent*, as tabled in the Legislative Council on 19<sup>th</sup> November 2003 in the *Clyde Transfer Terminal (Special Provisions) Bill 2003*.

Condition 60 of the Conditions of Development Consent require, *inter alia*, annual independent environmental audits of the performance of the development. The audit reports are to be submitted to the Director-General of the Department of Planning (DoP).

Site photographs can be viewed in Appendix A. Veolia staff escorted OTEK during the inspection and provided information on the operations and performance of the facility. Their hospitality, co-operation and assistance with the audit is acknowledged and appreciated. All requested documents were quickly and efficiently obtained and were current and up to date. Staff on-site were all aware of their responsibilities and were encouraged by site and corporate management to make any contribution to improving all aspects of the operation.

### **1.1 BACKGROUND**

The facility is located at 322 Parramatta Road, Clyde in an industrial estate that adjoins the Clyde rail yards. Development of the site for waste transfer activities was approved in 2003, subject to the Conditions of Development Consent. In accordance with the Consent, the then Department of Environment and Conservation issued an Environment Protection Licence (EPL11763) for the site on 15<sup>th</sup> January 2004.

There have been three previous environmental compliance audits submitted to the Director-General of the Department of Infrastructure, Planning and Natural Resources (as it was at the time):

- *Environmental Compliance Audit of the Clyde Transfer Terminal for Collex Pty Ltd, June 2005* by Environ;
- *Environmental Compliance Audit of the Clyde Transfer Terminal for Collex Pty Ltd, July 2006* by Environ; and

- *Environmental Audit*, Clyde Transfer Terminal, November 2007 by OTEK, Reference No. 4107050.

The 2007 audit report identified five non-conformances with the Conditions of Development Consent, relating to the control of odours (Conditions 70, 71, 76, and 86) and Condition 112, requiring vehicular noise emission testing.

## **2 OBJECTIVES AND SCOPE**

The objective of the environmental compliance audit was to satisfy Condition 60 of the Conditions of Development Consent.

The period of review for this audit is the period 16<sup>th</sup> January 2007 to 15<sup>th</sup> January 2008 (the 2007 operational and reporting period).

The following scope of works was undertaken to achieve this objective:

- A detailed site inspection and interviews were carried out by OTEK at on the 8<sup>th</sup> and 9<sup>th</sup> of July 2008;
- Detailed review of relevant documents supplied by Veolia;
- Assessment of the level of compliance of the with the Conditions of Development Consent;
- Assessment of the implementation of the Operation Environment Management Plan (OEMP);
- Assessment of the effectiveness of sub-plans developed under the OEMP (i.e. Waste, Odour, Noise, Dust, Traffic, Vermin and Pest Control, Stormwater, Contamination and Incident Response management plans); and
- Preparation of an Environmental Compliance Audit Report including a discussion of non-compliances, observations, and recommendations.

## **3 AUDIT METHODOLOGY**

Condition 60 (below) of the Conditions of Development Consent outline the requirements of the audit:

*60. Every year following the date of this consent, or at periods otherwise agreed to by the Director-General, and until such time as agreed to by the Director-General, the Applicant shall arrange for an independent audit of the environmental performance of the development.*

*The audits shall:*

*(a) be conducted pursuant to ISO 14010 Guidelines and General Principles for Environmental Auditing, ISO 14011 Procedures for Environmental Monitoring and any specifications of the Director-General;*

*(b) be conducted by a suitably qualified independent person approved by the Director-General;*

*(c) assess compliance with the requirements of this consent;*

- (d) assess the implementation of the EMP (Construction) and EMP (Operation) and review the effectiveness of the environmental management of the development; and*
- (e) be carried out at the Applicants expense.*

*The audits shall be submitted to the Director-General. The Applicant shall comply with all reasonable requirements of the Director-General in respect of any measures arising from or recommended by the audits and within such time as agreed to by the Director-General.*

In addition the DoP has requested that annual audits at the CTT should include separate sections addressing in detail the implementation and effectiveness of the OEMP and its individual sub-plans (i.e. Waste, Odour, Noise, Dust, Traffic, Vermin and Pest Control, Stormwater, Contamination and Incident Response management plans). To assist in the presentation of information regarding the effectiveness of environmental management activities, Conditions of Development Consent have been grouped into like categories, and so are not always presented in strict numerical sequence.

In this audit we have not assessed for compliance with the initial Construction Environment Management Plan (CEMP), as construction works had concluded prior to the commencement of this audit period. Conditions of Development Consent relation to construction activities have been identified separately, in Section 4.2. A separate CEMP was compiled for the construction of the new odour system. When referred to by the amendments to the CODCs, this second CEMP was audited.

Similarly, for clarity some items specific to the original development, for which there has been no change in status since the previous audit have been included in Section 4.2.

Based on the audit process and findings, the level of compliance with all relevant conditions in the Conditions of Development Consent have been assessed in Section 4.1. Where conditions relate to a common aspect of the facility or its operation, and an OEMP sub-plan, an assessment has also been provided of the effectiveness with which the sub-plan has been implemented.

Conditions outlined in the notice of amendment modification number MOD-133-11-2006, released on the 4<sup>th</sup> of April 2007 have been assessed. Conditions 84, 85, 86, and 89 have been deleted in accordance with MOD-133-11-2006. It should be noted that these conditions relate to odour management and have not been complied with during this period. These have not been identified as “non-compliances” to allow for a transitional period for the design, construction, permitting, and commissioning of the system.

In this document the term ‘audit period’ refers to the period 16<sup>th</sup> January 2007 to 15<sup>th</sup> January 2008.

#### **4 AUDIT FINDINGS**

The audit findings are presented in tables in the following sub-sections. It is noted that not all of the Conditions of Development Consent are relevant to this audit period. Conditions that are relevant to the audit period are presented and the compliance status discussed in section 4.1.

Some conditions applied to the period when the CTT was being constructed, or to a stated time period that concluded prior to this audit period. In these cases the Conditions of Development Consent have been provided in section 4.2, along with the basis for not auditing the condition.

The audit has used the following descriptors to present the audit findings for each Condition of Development Consent:

- Compliant – the CTT is in full compliance with the Condition;
- Largely Compliant – the CTT is in substantial compliance with the Condition;
- Non Compliant – the CTT is not in compliance with the Condition, or the extent of any compliance is minor;
- Not an auditable Condition – for example where the Condition required performance to the satisfaction of the Director-General and there was no evidence available of that satisfaction; and
- Not Applicable – some Conditions only applied in particular circumstances, and those circumstances did not occur during the audit period.

#### **4.1 CONDITIONS RELEVANT TO AUDIT PERIOD**

##### **4.1.1 General Introductory Conditions**

<b>Condition Number</b>	<b>Compliance Comments</b>	<b>Source Documents</b>	<b>Audit Finding</b>
1. Development shall be carried out in accordance with: (a) DA No. 205-08-01; (b) the EIS prepared for the “Clyde Transfer Terminal” by Maunsell McIntyre Pty Ltd, dated 14 August 2001; (c) the Supplementary EIS prepared for the “Clyde Transfer Terminal” by Maunsell	Installation of the odour filtration system was conducted in accordance with amendments outlined in MOD-133-11-2006 released on the 4 <sup>th</sup> of April 2007.		Compliant

<p>McIntyre Pty Ltd, dated 18 December 2001;</p> <p>(d) all additional information supplied by the Applicant or the Applicant’s consultants or subconsultants to the Department or integrated approval bodies pertaining to the development, including:</p> <p style="padding-left: 40px;">Noise Mitigation Details provided to the EPA by Vipac Engineers &amp; Scientists Ltd by facsimile dated 15 February 2002;</p> <p style="padding-left: 40px;">Stormwater Outlet Design, dated 18 February 2002, provided to the Department by Maunsell Australia Pty Ltd;</p> <p style="padding-left: 40px;">Information on traffic, odour and noise, dated 9 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd;</p> <p style="padding-left: 40px;">Information on the construction EMP, stormwater drainage, site contamination, landscaping and rehabilitation of Duck River, and the property boundary, dated 10 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd;</p> <p style="padding-left: 40px;">Information on odour management, Duck River cycleway, and traffic management, dated 10 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd;</p> <p style="padding-left: 40px;">Information on the property</p>			
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<p>boundary, dated 17 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd;</p> <p>Information on modifications to pipeline, pipe outlet, scour protection works, detention basin, weighbridge and noise barrier, dated 19 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd;</p> <p>Information on a proposed community consultative committee and possible community enhancement projects, dated 4 June 2002, provided to the Department by the Applicant;</p> <p>Information on Parramatta Road plans and odour control procedure, dated 12 June 2002, provided to the Department by Maunsell Australia Pty Ltd; and</p> <p>Information on odour management, dated 4 July 2002, provided to the Department by the Applicant except as modified by the following conditions.</p> <p>(e) Modification application MOD-133-11-2006, accompanied by Statement of Environmental Effects Modification to the Terminal Building Forced Ventilation System Clyde Waste Transfer Station, prepared by Environ and dated October 2006, the Odour Mitigation Study Clyde Waste Transfer Terminal Addendum to Final Report,</p>			
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<p>prepared by the Odour Unit and dated July 2006, and Veolia Environmental Services' letter (and attachments) to the Department of Planning dated 15 February 2007.</p>			
<p>3. It shall be the ultimate responsibility of the Applicant to ensure compliance with these Conditions.</p>	<p>The Applicant (Veolia) was found throughout the audit process to be assuming the responsibility for compliance.</p>	<p>Demonstrated in all documents referenced below.</p>	<p>Compliant</p>
<p>4. These Conditions do not relieve the Applicant of the obligation to obtain all other approvals and licences from all relevant authorities required under any other Act.</p>	<p>The audit process did not identify or give reason to suspect any non-compliance with this condition.</p>		<p>Compliant</p>
<p>5. The Applicant shall comply or ensure compliance with all the requirements of the Director-General in respect of the implementation of any measures arising from these Conditions.</p>	<p>Veolia was found to provide personnel and financial resources to ensure compliance with environmental requirements. Numerous plans and procedures had been established and implemented. As discussed below, in areas where full compliance is currently not being achieved there are initiatives being progressed to address the non-compliances.</p>	<p>Annual Environmental Management Report 2007 Annual Environmental Return, EPL11763. Veolia EMS Odour Control Construction EMP.</p>	<p>Largely Compliant</p>
<p>6. The Applicant must bring to the attention of the Director-General any matter that may require further investigation, or the issuing of instructions from the Director-General, to enable compliance with these Conditions. The Applicant shall comply or ensure compliance with any instruction issued by</p>	<p>Comments regarding Conditions 70 to 91 and 112 provide examples of Veolia following this process. No other matters were identified during the audit that were considered to be matters that should be brought to the attention of the Director-</p>	<p>See Conditions 70 to 91 and 112</p>	<p>Compliant</p>

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<p>the Director-General to enable compliance with these Conditions.</p>	<p>General.</p>		
<p>7. Where the results of any monitoring demonstrate an exceedence of a limit in this consent, the Applicant shall provide, within 30 days of the monitoring, the monitoring results to the Director-General and Auburn Council stating:</p> <p>(a) The reason for the exceedence;</p> <p>(b) Action taken to ensure the limit is not exceeded in the future;</p> <p>(c) Proposed action to ensure the limit is not exceeded in the future;</p> <p>(d) Timetable for implementing the proposed action in (c); and</p> <p>(e) Results of additional monitoring which has been conducted within 7 days of the action taken in (b) and (c) above, to demonstrate compliance with the limit.</p>	<p>Monitoring exceedence on 7<sup>th</sup> December 2007 of Condition 86 in original consent. Condition was deleted 4<sup>th</sup> April 2007.</p> <p>Exceedence was expected and measures were in place to replace the odour filtration system. Exceedence was reported.</p>	<p>Annual Environmental Management Plan 2007.</p> <p>Veolia Environmental Monitoring files and records.</p> <p>Veolia Annual Return to EPA 2008.</p>	<p>Compliant</p>
<p>8. No waste shall be received at the development except waste to be transported by rail from the Clyde Marshalling Yards for disposal at the Woodlawn Bioreactor.</p>	<p>There has been, on occasion, unacceptable wastes delivered to the terminal. In such cases, the appropriate remedial actions have been implemented.</p> <p>All systems implemented at CTT are considered adequate. Whilst a small number of unauthorized loads are delivered to the site, these are out of the control of VES. No additional controls are considered likely to improve VES compliance with respect to this condition. See also comments at</p>	<p>Hippo Station on-line incident reporting</p> <p>Non-conformances record book – weighbridge area.</p> <p>See Conditions 62 to 65.</p>	<p>Largely Compliant</p>

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	Conditions 62 to 65.		
<p>9. The volumes of waste accepted at the development shall not exceed the annual waste input rates in Table 1, approved for acceptance at the Woodlawn Bioreactor, unless otherwise approved by the Minister. The Minister shall give such approval if the need for additional capacity at the Woodlawn Bioreactor is demonstrated by an independent public assessment of landfill capacity and demand in the Sydney Region.</p> <p>The assessment shall:</p> <p>(a) take into account the status of alternative technologies for putrescible waste management and be undertaken at five-yearly intervals;</p> <p>(b) be completed one year before commencement of each five year period from the date of operational commencement of the Woodlawn Bioreactor, or at any other time at the request of the Applicant, with the first review due four years from the date of operational commencement of the Woodlawn Bioreactor; and</p> <p>(c) be undertaken by an independent person or organisation, to be appointed by the Minister, with the costs to be funded by the Applicant.</p>	<p>The tonnage accepted was approximately 406,624 tonnes, exceeding the allowed tonnage of 400,000.</p> <p>The exceedence was due to temporary closure of WSN facility in Auburn. Overflow from this closure was received at Clyde Transfer Terminal.</p> <p>The DECC was notified on 15<sup>th</sup> January 2008.</p>	<p>Annual Environmental Report 2007.</p> <p>EPA Annual Return 2008</p> <p>Veolia systems records.</p> <p>Letter to DECC January 15<sup>th</sup> 2008.</p>	<p>Non-Compliant</p>

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Table 1: Maximum Waste Input Rates			
Years from date of operational commencement of Woodlawn Bioreactor	Maximum input rate (tonnes per annum)		
0-5	400,000		
6-10	360,000		
11-15	325,000		
16-20	290,000		

10. In any event, no more than 500,000 tonnes of waste shall be accepted at the development in any one year.	As for Condition 9.	As for Condition 9.	Compliant
11. The applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the Protection of the Environment Operations Act 1997, having regard to the matters in s.83 of that Act.	The audit process did not identify or give reason to suspect any non-compliance with this condition.	Environmental Protection Licence No. 11763. Veolia/EPA correspondence file.	Compliant
12. The Applicant is to take all practicable measures to prevent and minimise harm to the environment as a result of the Development.	The audit process did not identify or give reason to suspect any non-compliance with this condition. 'Harm' is assumed to have the meaning defined in the <i>Protection of the Environment Operations Act 1997</i> . As noted elsewhere in this report the Application has identified and is in the process of implement initiatives that will further prevent and minimise the risk of harm to the environment.		Compliant
13. If at any time the Director-General is made aware of the occurrence of any impact from the project that poses serious	The audit process did not identify or give reason to suspect any such impact from the project that		Compliant

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<p>environmental or amenity concerns, and is due to the failure of measures required by these Conditions or those measures identified in the documentation referred to in Condition 1 to ameliorate the impact, the Director-General may request the Applicant to cease the activities causing the impact.</p>	<p>could have been brought to the attention of the Director-General, and no such request was made by the Director General.</p>		
<p>14. The Applicant may recommence the activities that were ceased, upon written advice by the Director-General that those concerns have been satisfactorily addressed.</p>	<p>Not applicable – see comments for Condition 13.</p>		<p>Not Applicable</p>
<p>18. The Applicant shall endeavour to resolve any dispute arising out of the implementation of these Conditions.</p>	<p>There has been correspondence with the DoP regarding the implementation of Condition 112, and the Applicant has commissioned works proposing an alternative methodology for satisfying Condition 112 (refer to comments for Condition 112).</p>	<p>See Condition 112</p>	<p>Compliant</p>
<p>19. For any unresolved dispute arising out of the implementation of these Conditions between the Applicant and a public authority, company or person (but excluding any dispute between the Applicant and its contractors and/or subcontractors engaged in the construction or operation of the development), in the first instance either party can refer the matter to the Director-</p>	<p>There were no unresolved disputes during the audit period. Discussions regarding Condition 112 were ongoing and had not concluded during the audit period.</p>		<p>Not Applicable</p>

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<p>General for resolution and, if not resolved, to the Minister.</p> <p>The Minister’s determination of the disagreement shall be final and binding on all parties.</p>			
<p>Monitoring Records</p> <p>20. The results of any monitoring required to be conducted by the Conditions of this Consent or a licence under the Protection of the Environment Operations Act 1997, in relation to the development, must be recorded and retained as specified in this Consent.</p>	<p>The audit inspected monitoring records and found that they satisfy this Condition.</p>	<p>Annual Environmental Management Report 2007.</p>	<p>Compliant</p>
<p>21 (<i>Amended</i>). All records required to be kept by this Consent or an environment protection licence must be:</p> <p>(a) in a legible form, or in a form that can readily be reduced to a legible form;</p> <p>(b) kept for at least 4 years after the monitoring or event to which they relate took place; and</p> <p>(c) provided in a legible form to the Director-General or any authorized officer of the DEC as soon as practicable after a request.</p>	<p>Records were able to be inspected during the audit, in a legible form.</p> <p>Documents are being retained for at least the required period.</p> <p>Whilst the audit did not identify any request , Veolia policy is to comply with such requests.</p>	<p>Veolia Environmental Policy.</p> <p>Veolia/EPA correspondence file.</p>	<p>Compliant</p>
<p>22. The following records must be kept in respect of any samples required to be collected:</p> <p>(a) the date(s) on which the sample was taken;</p>	<p>This information was observed on Veolia records. Some reports did not contain the name of the sampler or the time sampled.</p> <p>OTEK has advised</p>	<p>Annual Environmental Management Report 2007 (which included copies of consultant reports).</p>	<p>Largely Compliant</p>

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<p>(b) the time(s) at which the sample was collected;</p> <p>(c) the point at which the sample was taken; and</p> <p>(d) the name of the person who collected the sample.</p>	<p>Veolia to ensure all details (a) through (d) are included in future consultant's reports</p>		
<p>25. (<i>Amended</i>) The Applicant shall prepare an EMP (Construction Stage) which is specific to the development.</p> <p>25A. Prior to commencement of construction of the odour control system subject to MOD-133-11-2006, the Applicant shall prepare and obtain approval from the Director-General for a Construction Environmental Management Plan (CEMP) specific to such works. The CEMP, to be submitted to the Director-General and the DEC, shall include (but not necessarily be limited to) measures to be undertaken to minimize environmental impacts during construction with particular emphasis on measures for mitigating odour, dust, noise, and traffic impacts on surrounding landuses. The CEMP shall provide details of how the environmental performance of the remediation works will be monitored, what actions will be taken to address identified adverse environmental impacts, and how the relevant requirements of conditions 26 to 38 shall be addressed. The CEMP shall</p>	<p>Site interviews indicate the Construction Environmental Management Plan (CEMP) was implemented in full during the construction phase.</p>	<p>CEMP</p>	<p>Compliant</p>

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<p>reflect restrictions to construction hours as follows: Monday to Friday from 7am to 6pm, and Saturdays from 8am to 5pm, with no construction work on Sundays and Public Holidays. The CEMP shall be implemented during construction.</p>			
<p>Environmental Management Plan (EMP) (Operation Stage - OEMP)</p> <p>39. The Applicant shall prepare an EMP (Operation Stage) which is specific to the development.</p>	<p>The audit reviewed the OEMP, including changes made by revisions and considers that it satisfies this condition.</p>	<p>OEMP dated February 2008 revision H (included amendments from audit period)</p>	<p>Compliant</p>
<p>40. The EMP (Operation Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.</p>	<p>The OEMP is comprehensive and specific and is considered to comply with the requirements of this condition.</p> <p>Reference to Waste Classes out of date and should be updated to reflect current Waste Classification Guidelines (2008) as outlined in EPA License 11763.</p>	<p>OEMP dated February 2008 revision H.</p>	<p>Largely Compliant</p>
<p>41. The EMP (Operation Stage) shall include, but is not necessarily limited to, the following plans:</p> <ul style="list-style-type: none"> <li>(a) Waste Management Plan</li> <li>(b) Odour Management Plan</li> <li>(c) Dust Management Plan</li> <li>(d) Traffic Management Plan (includes monitoring and enforcement of “left turn only”)</li> </ul>	<p>The audit confirmed that all of the listed sub-plans had been prepared. They were, with the exceptions noted in the following subsections, found to be comprehensive and specific and are considered to satisfy this condition.</p> <p>Compliance with the</p>	<p>All individual OEMP sub-plans were reviewed.</p>	<p>Compliant</p>

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<p>(e) Vermin and Pest Control Plan (includes housekeeping measures)</p> <p>(f) Stormwater Management Plan</p> <p>(g) Site Contamination Management Plan</p> <p>(h) Incident Response Plan</p> <p>(i) Noise Management Plan</p> <p><i>Amendment</i> – Prior to commencement of operation of the odour control system subject to MOD-133-11-2006, the Applicant shall review the EMP (Operation) in order to update procedures, measures and monitoring requirements applicable to the modified odour control system. The revision of the EMP shall cover the relevant plans (a) – (i) outlined above, including (but not necessarily limited to) the Odour Management Plan, the Dust Management Plan, and the Noise Management Plan. The revised EMP (Operation) shall be submitted to the DEC and the Director-General. The Director-General’s approval of the revised EMP (Operation) shall be obtained prior to commencement of operation of the odour control system.</p>	<p>amendment further demonstrated by postponing operation of the odour management system until approval was granted from the DECC (not received until June 2008).</p>		
<p>42. The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Operation Stage).</p>	<p>The OEMP was found to address all of the elements required by this condition.</p>		<p>Compliant</p>
<p>43. The Applicant must not accept any uncontainerised</p>	<p>The OEMP was approved prior to the</p>	<p>Veolia/DoP</p>	<p>Compliant</p>

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waste at the premises until the EMP (Operation Stage) has been approved by the Director-General.	period under audit.	correspondence file	
45. All site personnel (including contractors and subcontractors) during the operational stage must be inducted and trained to ensure compliance with the approved EMP (Operation Stage).	The auditors sighted a range of training documents and records that demonstrated that appropriate training was being provided to staff, contractors and subcontractors.	Veolia training programs and training records. Site induction video.	Compliant
46. The approved EMP (Operation Stage) shall be made publicly available on request to the Applicant.	The audit confirmed that it is Veolia's policy to provide such information requested by the public. The form in which the OEMP would be provided would be determined by Veolia depending on the specifics of the request.	Veolia Environmental Policy	Compliant

**4.1.2 Waste Management Plan**

<b>Condition Number</b>	<b>Compliance Comments</b>	<b>Source Documents</b>	<b>Audit Finding</b>
47. The Waste Management Plan must address, but is not necessarily limited to, the following issues:  (a) Procedures for inspecting and recording each load of uncontainerised waste received at the terminal and for separating and disposing of any component of the waste that is not permitted to be accepted  (b) Priority waste handling given to the most offensive wastes,	Each of these specific requirements was found to be adequately addressed in the Waste Management Plan.	Waste Management Plan, February 2008 – Revision J.  Various CTT procedures.  Audit interviews.	Compliant

<p>otherwise “first in/first out” waste handling</p> <p>(c) Procedures for cleaning vehicles before they leave the premises in a manner that prevents the tracking of waste from the premises</p> <p>(d) An education program for all drivers of waste vehicles using the site, about waste types permitted to be received at the premises and the need to ensure their vehicle does not track waste from the premises</p> <p>(e) The inclusion of conditions in contracts with waste transporters addressing acceptable waste types and punitive measures for non-compliances</p> <p>(f) An enforcement program to be maintained for the duration of the development which includes the imposition of punitive measures for delivering unacceptable waste types</p> <p>(g) Procedures for minimising wind blown litter from leaving the premises and for regular patrols of surrounding areas to collect any litter that has been carried from the premises</p> <p>(h) Procedures for preventing washdown waters and any other liquid that has been in contact with waste from entering the stormwater system</p> <p>(i) An operational contingency plan to be implemented in the event of equipment failure, industrial action or other</p>			
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<p>situation that prevents the containerisation of waste that has been in the terminal building in excess of 18 hours</p> <p>(j) Fire management procedures including the management of fire water in a manner that will not pollute waters.</p>			
<p>62. The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises unless permitted to do so by an environment protection licence.</p>	<p>One load (out of 63,336) was inappropriately delivered to the facility.</p>	<p>Annual Environmental Management Report 2007.</p> <p>Non-conforming load register.</p>	<p>Largely Compliant</p>
<p>63. The Applicant must ensure that waste received at the premises is restricted to inert and solid waste as defined in Schedule 1, Part 3 of the Protection of the Environment Operations Act 1997 or is assessed as inert waste or solid waste following the technical assessment procedure outlined in Technical Appendix 1 of the Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (EPA, 1999)</p>	<p>Condition reflects superseded waste classes (classification changed outside this audit period).</p> <p>EPL11763 restricts waste received to General Solid Waste</p> <p>See comments for Condition 62.</p>	<p>Site signage, contract conditions, driver training and site checks and inspections.</p> <p>Hippo Station incident reporting highlights non-conforming loads.</p> <p>Non-conforming load register.</p>	<p>Largely Compliant</p>
<p>64. No waste shall be removed from the premises except:</p> <p>(a) construction waste arising from activities during the construction stage of the development</p> <p>(b) waste in sealed shipping containers to be transported by rail for disposal at the</p>	<p>Inappropriately delivered wastes were separated and redirected to the proper disposal destination on each of the four occasions.</p> <p>Oversize or non-compactable items (eg. larger steel or concrete items) that could damage</p>	<p>Annual Environmental Management Report 2007.</p> <p>On-site discussion with Operations Staff.</p>	<p>Compliant</p>

<p>Woodlawn Bioreactor</p> <p>(c) small quantities of waste not permitted by the EPL to be received at the terminal, that have been separated out from the incoming waste stream through a documented operational procedure of regular waste inspections and associated control measures: these wastes are to be disposed of to a lawful waste facility</p> <p>(d) waste generated from onsite activities such as plant maintenance and repairs, that is not suitable for acceptance at the Woodlawn Bioreactor: these wastes are to be disposed of to a lawful waste facility</p> <p>(e) wastewater generated onsite: these wastes are to be disposed of to sewer</p> <p>(f) leachate generated from the onsite management of waste: these wastes are to be disposed of to sewer or a lawful liquid waste treatment plant</p> <p>(g) recyclable materials generated from the onsite office: these wastes are to be directed to a suitable recycling facility.</p>	<p>the compacting equipment is separated out for recycling or for disposal to an alternative facility.</p>		
<p>65. The Applicant shall implement the approved Waste Management Plan to the satisfaction of the Director-General.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Director-General, the concluding remarks below address the effectiveness of the implementation of the</p>		<p>Not an auditable Condition</p>

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	Waste Management Plan.		
66. The Applicant will not accept asbestos at the premises. The Waste Management Plan must make provision for identification of asbestos in waste not knowingly received at the premises and for the proper and safe disposal of any asbestos so identified.	The CTT prohibits the receipt of asbestos.	Site signage, contract conditions, driver training and site checks and inspections.	Compliant
67. Records shall be made and maintained of each load of waste entering the premises, including the identification of the vehicle, weight, nature and origin of the waste received, and whether the waste was received in pre-packaged shipping containers or for on-site containerisation.	All required data is created at the weighbridge.	Delivery dockets, site procedures and site information management system records.  RMS – Refuse Management System.	Compliant
68. Records shall be made and maintained of any waste leaving the premises by motor vehicle, including the identification of the vehicle, and the weight, classification and destination of the waste.	Inspection of records confirmed this to occur.	Waste disposal dockets and records.  RMS	Compliant
69. Records shall be made and maintained of all events involving the removal of any waste received at the premises which is not permitted to be accepted at the premises.	See comments for Condition 62.		Compliant

**Implementation and Effectiveness of the Waste Management Plan:**

The audit found that the Waste Management Plan, whilst well implemented, was not 100 per cent effective in ensuring that only authorised wastes were delivered to the facility. CTT

implemented a range of initiatives to inform customers and drivers of the wastes that are able to be delivered to the facility. In one case a prohibited waste was delivered to CTT. However, in such cases the appropriate remedial and punitive actions were implemented to ensure the waste was recovered and disposed of to an approved destination. The CTT informs the Veolia representative from the source area, who follows up with the client.

Given there were approximately 63,336 deliveries in the year, this represents a very small breach rate, and an improvement on the previous year.

The audit found the external site conditions to be relatively litter free (with the exception of working areas beneath the compactors). This also demonstrated the effectiveness of the implementation of this sub-plan. Discussions with staff and contractors during the audit confirmed that individuals had a solid appreciation of their individual roles and responsibilities, as outlined in the Waste Management Plan.

The audit concluded that Veolia was aware of the extent to which the Waste Management Plan was effective, and was continuing to expand information programs and develop new initiatives to ensure that only approved wastes were delivered to the site.

**4.1.3 Odour Management Plan**

Condition Number	Compliance Comments	Source Documents	Audit Finding
<p>48. (<i>Amended</i>) The Odour Management Plan must address, but is not necessarily limited to, the following issues:</p> <p>(a) detailed description of the odour control system subject to MOD-133-11-2006, including (but not necessarily limited to) scaled drawings of the system and its location, technical specifications and operational methods;</p> <p>(b) procedures for the management of waste at the premises at all times to minimise the generation of odours;</p> <p>(c) protocols for the operation of the odour control mechanisms for the terminal building,</p>	<p>Each of these specific requirements was found to be adequately addressed in the Odour Management Plan.</p>	<p>Odour Management Plan, February 2008 – Revision H.</p> <p>Various CTT procedures.</p> <p>Audit interviews.</p>	<p>Compliant</p>

<p>including the forced air extraction system, to minimise the risk of any adverse impact on surrounding commercial and residential areas;</p> <p>(d) procedures for the maintenance and repair of the forced air extraction system on the terminal building;</p> <p>(e) an emission monitoring program designed to determine compliance with the DEC's odour goal of less than 2OU at the nearest sensitive receiver and to establish the efficiency of the forced air extraction system and appropriate equipment maintenance schedules. The program is to include odour emission monitoring using dynamic olfactometry in such a way as to allow determination of the performance of the odour control system;</p> <p>(f) An odour audit program which provides for a comprehensive odour audit of the premises and nearby commercial and residential areas, by an independent, appropriately qualified and experienced person, to be conducted 3-monthly for the initial 24 months of receiving uncontainerised waste at the terminal, 3-monthly for the 12 months following commissioning the odour control system subject to MOD-133-11-2006, and 6-monthly thereafter, unless otherwise</p>			
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<p>approved in writing by the Director-General;</p> <p>(g) An operational contingency plan to be initiated in the event of equipment failure, industrial action or any other situation that prevents the containerisation of any waste that has been in the terminal building in excess of 18 hours. Such a plan shall include suspending the acceptance of further uncontainerised waste at the premises;</p> <p>(h) A testing program designed to determine appropriate maintenance schedules for replacement of odour adsorption material in the pressure relief vents of the waste containers;</p> <p>(i) Procedures for the maintenance and repair of the odour adsorption and pressure relief vents of the waste containers, including the replacement of the odour adsorption material; and</p> <p>(j) A community consultation program on odour. The community consultation program may include a community survey, to be developed in conjunction with the community consultative committee.</p>			
<p>70. (<i>Amended</i>) The Applicant shall install a forced ventilation system in the Terminal Building in accordance with MOD-133-11-2006, the design specified in</p>	<p>Approval received for construction on 11<sup>th</sup> December 2007 with a modified design to that described in Condition</p>	<p>Construction EMP Odour Control System Modification October 2007  Annual</p>	<p>Compliant</p>

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<p>the report Addendum to Final Report-Odour Mitigation Study – Clyde Waste Transfer Terminal – Collex Pty Ltd prepared by the Odour Unit Ltd and dated July 2006, and drawing N3630/100 titled Clyde Transfer Terminal Roof and Gallery Level Proposed Ducting Layour Details prepared by Turnkey Environmental Systems Pty Ltd. The system shall include a single air exhaust stack to discharge all air from the waste receival and compaction/loading building, in accordance with the following specifications (see below):</p> <p>The six original fans drawing air from the building through the odour control system shall be replaced with six fans of at least 18kW capacity (each) as per MOD-133-11-2006. The forced air extraction system installed under MOD-122-11-2006 shall be capable of operating in a proper and efficient manner under continuous duty.</p> <p>Any variations of the design and specifications indicated above resulting from the detailed design of the odour control system shall be approved by the Director-General, in consultation with the DEC, prior to the commencement of construction. As part of such approval, the Director-General may require the applicant to provide information demonstrating that the final design will not result in</p>	<p>70.</p>	<p>Environmental Management Report 2007</p> <p>Veolia/DoP correspondence.</p>	
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increased impacts as those predicted in the documents referred to under condition 1(e).						
Minimum Stack Height (metres above existing ground level)	Minimum Stack Height above the top of the roof (metres)	Minimum Stack Diameter (metres)	Minimum Stack Exit Velocity (m/s)	Minimum Stack Exit Volumetric Flow Rate (m3/s)	Location (X coordinate)	Location (Y coordinate)
21	4	2.64	20	109.48	317145	6254129
<p>71. (<i>Amended</i>) Construction of the Terminal Building forced ventilation system in accordance with MOD-133-11-2006 shall be undertaken under continuous operation of the original forced ventilation system (as per design approved by the Director-General in correspondence to Collex dated 5 January 2003). Forced ventilation in the Terminal Building, by the operation of the original system or the new system subject to MOD-133-11-2006, shall not be interrupted at any time during the period of transferring odour control systems, unless otherwise approved by the Director-General following a written application for temporary stoppage of the ventilation system during that period. Such application shall provide details of stoppage time required, impacts predicted, and proposed mitigation measures and notification requirements. This condition does not apply at times when waste is not contained in the building.</p>		<p>Noted in Odour Management Plan OEMP in Conditions of Consent.</p> <p>No evidence sighted of occurrence.</p>		<p>Odour Management plan OEMP.</p>		<p>Not a directly auditable condition.</p> <p>Anecdotal evidence indicates compliance.</p>

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<p>72. (<i>Amended</i>) Prior to commencement of construction of the works required under MOD-133-11-2006, the Applicant shall notify the Director-General, Auburn Council, the DEC, and the Community Consultative Committee in writing of the date of commencement of construction, details of the main construction activities and anticipated duration of construction and times of the main construction activities.</p>	<p>Correspondence between all parties is continuing and ongoing.</p>	<p>CCC meeting minutes Veolia/DoP/DECC correspondence</p>	<p>Compliant</p>
<p>73. The Applicant shall implement the approved <i>Odour Management Plan</i> to the satisfaction of the Director-General.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Director-General, the concluding remarks below address the effectiveness of the implementation of the Odour Management Plan.</p>		<p>Not an auditable Condition</p>
<p>74. The Applicant must not cause or permit the emission of offensive odours from the premises, as defined under section 129 of the <i>Protection of the Environment Operations Act 1997</i>.</p>	<p>Nineteen odour complaints were received by the CTT during the audit period. However not all of these complaints were likely to be attributable to the CTT, and no comment can be made as to if any of these complaints could have been considered offensive. There were no prosecutions for offensive odour during the audit period. Independent odour audits detected very</p>	<p>Annual Environmental Management Report 2007. Annual Report EPAL11763 Odour Audit Reports. Veolia Environmental Records.</p>	<p>Compliant</p>

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	<p>weak odours of a garbage character downwind on the CTT boundary, but no odours were detectable off-site (May and December 2007).</p>		
<p>75. The Applicant is not permitted to use deodorisers for odour control at the premises, unless otherwise approved by the Director-General.</p>	<p>Mains water only is used in the dust suppression system. An odour neutralizing chemical (Deodour Air 1000) is occasionally used in minor quantities from a domestic type portable hand-pump spray container for worker comfort within the building. Veolia have not sought permission from the Director-General as it is considered to be an OH&amp;S issue, and is only used for localised worker comfort. Veolia also consider Deodour Air to be an odour neutralizer rather than a deodorizer. Veolia intend to seek clarification during the next audit period.</p>	<p>Audit inspection, correspondence and discussions.</p>	<p>Non Compliant (subject to interpretation)</p>
<p>76. (<i>Amended</i>) The Applicant shall continuously operate the forced ventilation system subject to MOD-133-11-2006 (and the original forced ventilation system until the system subject to MOD-133-11-</p>	<p>The forced air extraction system (but not the odour filtration system) operates at all times wastes are present in the building. The system subject to MOD-133-11-</p>	<p>Correspondence and discussion.</p>	<p>Compliant</p>

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<p>2006 becomes operational) whenever waste is contained within the building, unless otherwise approved by the Director-General. As part of such approval, the Director-General may require the Applicant to carry out additional investigations and implement additional measures to mitigate any off-site impacts that may be anticipated or identified from such investigations.</p>	<p>2006 was commissioned after the audit period.</p>		
<p>77. (<i>Amended</i>) Within three months of the commissioning of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall conduct:</p> <p>(a) odour emission rate sampling and analysis from the single stack (conducted in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DEC January 2007); and</p> <p>(b) odour dispersion modelling for the stack odour discharge conducted in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (DEC, August 2005) and the Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW (DEC, November 2006)</p> <p>To confirm whether the operation of the modified stack design meets the DEC’s odour goal of less than 2 OU at the nearest sensitive receiver.</p>	<p>The forced ventilation system subject to MOD-133-11-2006 was not operational during the audit period.</p>		<p>Not Applicable</p>

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<p>78. <i>(Amended)</i> The results of any odour performance testing and modelling conducted in accordance with the conditions of this Consent, including those required under condition 77, must be submitted to the Community Consultative Committee, the EPA, the Director-General and be made publicly available, within 8 weeks of the testing and modelling having been completed.</p>	<p>Odour performance testing results.</p> <p>No record was sighted that testing results were submitted within 8 weeks. VES were reporting results in accordance with the previous Condition 78. See discussion below.</p> <p>OTEK has recommended that Veolia conforms to this condition with respect to future testing and modeling.</p>	<p>Annual Environmental Management Report 2007.</p> <p>Odour Audit No. 9 – 28<sup>th</sup> May 2007</p>	<p>Non-Compliant</p>
<p>79. <i>(Amended)</i> Following the review of the investigations required under condition 77, or any other odour related investigations and documentation required under this consent, the Director-General in consultation with the DEC may require the Applicant to carry out additional investigations and implement additional measures to mitigate any identified off-site odour impacts.</p>	<p>No requests have been made for additional measures, if such requests were made it would be Veolia's policy to comply with any requests.</p>	<p>Veolia/DoP correspondence file.</p>	<p>Compliant</p>
<p>80. All odour monitoring and management plans shall be made available to the public on request to the Applicant.</p>	<p>The audit confirmed that it is Veolia's policy to provide such information requested by the public. The form in which the OEMP would be provided would be determined by Veolia depending on the specifics of the request.</p>	<p>Veolia Environmental Policy.</p>	<p>Compliant</p>

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<p>81. Any containerised waste shall not be exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent.</p>	<p>The audit inspected a random sample of containers, and confirmed that this condition is satisfied.</p>		<p>Compliant</p>
<p>82. The design of the pressure release mechanism and odour filtration system on the waste containers shall be approved by the Director-General prior to the acceptance of any uncontainerised waste at the premises.</p>	<p>The design has not changed during the audit period.</p>		<p>Compliant</p>
<p>83. Any waste that has been packed into containers on the site, shall not be re-exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent.</p>	<p>The audit inspected a random sample of containers, and confirmed that this condition is satisfied.</p>		<p>Compliant</p>
<p>84. Deleted as per MOD-133-11-2006</p>			
<p>85. Deleted as per MOD-133-11-2006</p>			
<p>86. Deleted as per MOD-133-11-2006</p>			
<p>87. (<i>Amended</i>) The applicant shall carry out monitoring of the forced ventilation system subject to MOD-133-11-2006 (including air emissions monitoring or other) as may be</p>	<p>The system subject to MOD-133-11-2006 was not commissioned during the audit time period, however the required pollutants were</p>	<p>Annual Environmental Management Report 2007.</p>	<p>Compliant</p>

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<p>required under any Environment Protection License. The monitoring results shall be reported in the Annual Environmental Management report required under condition 59.</p>	<p>monitored during the audit period, and reported in the Annual Environmental Management report.</p>		
<p>88. Monitoring for the concentration of a pollutant emitted to the air must be done in accordance with:</p> <p>(a) any methodology which is required by or under the Protection of the Environment Operations Act 1997 to be used for the testing of the concentration of the pollutant; or</p> <p>(b) if no such requirement is imposed by or under the Protection of the Environment Operations Act 1997, any methodology which the general terms of approval or a condition of the licence (as the case may be) requires to be used for that testing; or</p> <p>(c) if no such requirement is imposed by or under the Protection of the Environment Operations Act 1997 or by the general terms of approval or a condition of the licence (as the case may be), any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p> <p>Note: The Clean Air (Plant and Equipment) Regulation 1997 requires testing for certain</p>	<p>Approved methodologies were used.</p>	<p>Odour Audit report 9 August 2007.</p>	<p>Compliant</p>

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<p>purposes to be conducted in accordance with test methods contained in the publication “Approved Methods for the Sampling and Analysis of Air Pollutants in NSW”.</p>			
<p>90. (<i>Amended</i>) Prior to the installation of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall provide to the DEC, manufacturer’s performance guarantees, demonstrating to the satisfaction of the DEC that the equipment will comply with the design parameters specified in this consent and/or the Environment Protection License.</p>		<p>Manufacturer’s design drawings Correspondence</p>	<p>Compliant</p>
<p>91. A meteorological station must be sited and operated at the premises in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW. The Applicant shall undertake the sampling and analysis of the meteorological parameters specified in table below. Sampling and analysis of meteorological parameters shall be carried out strictly in accordance with the methods and references specified in the table.</p>	<p>The CTT was operated as required by this condition.</p>	<p>Annual Environmental Management Report 2007. Veolia environmental records. Compact disc with meteorological data.</p>	<p>Compliant</p>

Parameter	Units of measure	Averaging Period	Method <sup>1</sup>	Frequency
Wind Speed @ 10 m	m/s	1 hour	AM-2 & AM-4	Continuous
Wind Direction @ 10 m	°	1 hour	AM-2 & AM-4	Continuous
Sigma Theta @ 10 m	°	1 hour	AM-2 & AM-4	Continuous
Temperature @ 10 m	K	1 hour	AM-4	Continuous
Temperature @ 2 m	K	1 hour	AM-4	Continuous
Solar Radiation	W/m <sup>2</sup>	1 hour	AM-4	Continuous
Rainfall	mm	24 hours	AM-4	Continuous
Evaporation	mm	24 hours	Note <sup>2</sup>	Continuous
<b>Additional Requirements</b>		<b>Method<sup>1</sup></b>		
Siting		AM-1 & AM-4		
Measurement		AM-2 & AM-4		

Note: <sup>1</sup>All methods are specified in the *Approved Methods for the Sampling and Analysis of Air Pollutants in NSW*.  
 Note: <sup>2</sup>Method approved by the EPA in writing.

**Implementation and Effectiveness of the Odour Management Plan:**

For the majority of the audit period, correspondence between Veolia, and the DECC and DoP was occurring for the design, approval, construction, and commissioning of the new odour filtration system. The new Odour Management Plan is being implemented and many of the previously-identified odour issues will be sufficiently improved to become compliant with all Conditions.

One of the non-compliances highlighted is in regards to a lack of reporting monitoring results within 8 weeks. Further investigation indicated Veolia's interpretation of the Condition to mean results associated with condition 77 were to be reported within 8 weeks. No data had been collected for this monitoring requirement. However, OTEK have advised that we interpret the condition to indicate any odour monitoring should be reported within 8 weeks, not just those associated with the new system. OTEK notes that the results were reported within the annual report. Veolia have indicated they will begin to submit results within 8 weeks.

The second non-compliance relates to the local use of an odour neutralizer for the comfort of the workers within the waste dumping area. The auditors interpret condition 75 to reflect large-scale use of deodorizers to mask the odour through the filtration system. The auditors attempted to find a suitable definition for neutralizer vs deodorizer, but found the two were used interchangeably throughout the industry. Further clarification as to the intent of this condition would be beneficial.

Annual stack monitoring was performed within the audit period and exceedences were found. In addition, a section of the forced ventilation system was inoperable for some of the audit period. Veolia was aware of the extent to which the Odour Management Plan during the audit period was ineffective, and have completed the necessary measures and capital expense to improve the facility. The auditors are confident that if recommended monitoring timeframes are adhered to, the Odour Management Plan will be successfully implemented during the current operating year.

**4.1.4 Dust Management Plan**

Condition Number	Compliance Comments	Source Documents	Audit Finding
<p>49. (<i>Amended</i>) The Dust Management Plan shall include, but not necessarily limited to, control strategies to achieve compliance with any dust emission limits in this consent and any applicable environment protection license. The Dust Management Plan shall adopt the recommendations made by Turnkey Environmental Services Pty Ltd (dated 13 Feb 2006) and provided in Appendix D of the Statement of Environmental Effects Modification to the Terminal Building Forced Ventilation System Clyde Waste Transfer Station (Environ, Oct 2006) in relation to the dust suppression spray system at the terminal. The Dust Management Plan shall provide for the monitoring of the performance of the dust suppression system and for improving its performance as it may be necessary. The Dust Management Plan shall incorporate an Ambient Air Quality Monitoring Plan, prepared in accordance with conditions 96 and 97, including requirements for monitoring and reporting any changes in TSP and dust deposition levels in the nearest residential areas after installation of the odour control system subject to MOD-133-11-2006. Following review of monitoring performance results,</p>	<p>The Dust Management Plan was revised in June 2007 to incorporate an ambient air quality monitoring plan, but there is no mention of a dust suppression spray system. This has been added to the most recent Dust Management Plan, revision H, released February 2008. While this is outside of the audit period, interim notes were included in the June 2007 revision G, Version 1, and this condition is considered to be satisfied.</p>	<p>Dust Management Plan, June 2007 – Revision G.  Various CTT procedures.</p>	<p>Compliant</p>

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<p>the Director-General may require the Applicant to undertake further investigations, monitoring, or implement measures aimed to mitigate identified dust impacts on residential areas associated with the operation of the terminal.</p>			
<p>92. The Applicant shall implement the Dust Management Plan (Construction Stage) and the approved Dust Management Plan (Operation Stage) to the satisfaction of the Director-General.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Director-General, the concluding remarks below address the effectiveness of the implementation of the Dust Management Plan (Operation Stage).</p>		<p>Not an auditable Condition</p>
<p>93. All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.</p>	<p>The site audit identified a range of site activities being implemented which were considered to be effective in minimising the emission of dust from the site. Ambient air monitoring results confirm this.</p>	<p>Procedures noted.</p>	<p>Compliant</p>
<p>94. All trafficable areas and vehicle manoeuvring areas in or on the premises shall be maintained at all times in a condition that will minimise the generation or emission from the premises, of wind-blown or traffic generated dust.</p>	<p>The audit inspection confirmed that this condition is being complied with.</p>		<p>Compliant</p>
<p>95. Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading</p>	<p>The audit inspection confirmed that this condition is being complied with. It is further noted that the</p>		<p>Compliant</p>

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<p>and unloading. (EPA)</p>	<p>majority of deliveries are in fully contained compactor trucks.</p>		
<p>96. The Applicant must prepare and implement an Ambient Air Quality Monitoring Plan. The Plan must address, but not necessarily be limited to, the following:</p> <p>(a) Monitoring methodologies and standards (sampling and analysis);</p> <p>(b) Monitoring for concentrations of total suspended particulates (TSP) and dust deposition rates;</p> <p>(c) Locations where monitoring will be carried out;</p> <p>(d) Detailed monitoring cycle and the duration of each monitoring cycle; and</p> <p>(e) Reporting.</p>	<p>The Dust Management Plan addresses the requirements of this condition and all required sampling events were completed during the audit period.</p>	<p>Dust Management Plan, June 2007 – Revision G.</p> <p>Annual Environmental Management Report 2007.</p> <p>Veolia environmental records.</p>	<p>Compliant</p>
<p>97. The Applicant shall undertake sampling and analysis for ambient air pollutants in accordance with the methods and the frequencies detailed in the table below. Ambient air pollutant monitoring sites shall be selected in accordance with Approved Methods for the Sampling and Analysis of Air Pollutants in NSW.</p>	<p>See comments for Condition 96.</p>		<p>Compliant</p>

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Pollutant	Location	Method <sup>1</sup>	Frequency
Particulate matter (TSP)	Nearest residence or public space and background	AM-1, AM-15	As per AM-15
Particulates (Deposited matter)	Nearest residence or public space and background	AM-1, AM-19	As per AM-19

*Note: <sup>1</sup> All methods are specified in the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW and all monitoring must be conducted strictly in accordance with the requirements outlined in this document.*

98. Detailed records of operating conditions inside the waste terminal building shall be made coincident with any monitoring for odour or dust required by Conditions of this Consent.	Observations were not viewed in all reports/audits on general housekeeping in operation terminal	Emission Testing Report – The Odour Unit 14 <sup>th</sup> December 2007  Odour Audit IX Clyde Waste Terminal – The Odour Unit August 2007  Odour Audit X Clyde Waste Terminal – December 2007.	Largely Compliant
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**Implementation and Effectiveness of the Dust Management Plan:**

The audit found that the Dust Management Plan was sufficiently implemented and effective to ensure that excessive dust was not generated at the site.

General terminal conditions and housekeeping notes were not included on all consultant reports/audits. In order to fully satisfy condition 98, consultants should be asked to comply in full with this condition and explicitly state the inside condition of the terminal.

The audit found the site conditions, facilities and procedures were resulting in a site where observed and measured dust levels and the absence of dust related complaints all demonstrate that CTT is effectively managing this aspect of their operations.

**4.1.5 Traffic Management Plan**

Condition Number	Compliance Comments	Source Documents	Audit Finding
50. The Traffic Management Plan must address, but is not necessarily limited to, the following issues:  (a) An education program for all drivers and owners of waste vehicles using the site, about	Each of these specific requirements was found to be adequately addressed in the Traffic Management Plan.	Traffic Management Plan, Feb 2007 – Revision J.  Various CTT procedures.	Compliant

<p>the “left turn only” restrictions on entering and leaving the premises via Parramatta Road</p> <p>(b) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the “left turn only” restriction upon entering or leaving the premises via Parramatta Road.</p> <p>(c) An education program for all drivers and owners of waste vehicles using the site, about the waste transport routes permitted to be used in the vicinity of the development</p> <p>(d) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the permitted transport routes</p> <p>(e) An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached</p> <p>(f) Contracts with waste transporters to include conditions addressing entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances.</p> <p>(g) Measures to minimise trucks and other heavy vehicles from entering or exiting the premises between the following hours: 10pm and 5am Mondays to Saturdays; 10pm and 7am Sundays and public holidays.</p>			
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<p>118. All access to the development shall be via a sealed access road from Parramatta Road. No vehicle shall enter or exit the development via the internal road connecting the Clyde Marshalling Yards to Rawson Street.</p>	<p>The audit could find no reason to suspect that this condition is not being complied with.</p>	<p>Audit inspections.</p>	<p>Compliant</p>
<p>119. No vehicle entering the development shall turn right off Parramatta Road.</p>	<p>There were a total of 15 traffic infringements in the audit period, some of which were a breach of this condition. Controls in place limit the occurrence of these infringements as much as possible.</p>	<p>Annual Environmental Management Report 2007. Hippo Station incident reports. Veolia environmental records.</p>	<p>Largely Compliant</p>
<p>120. No vehicle exiting the development shall turn right onto Parramatta Road.</p>	<p>See comments regarding Condition 119.</p>	<p>Annual Environmental Management Report 2007. Hippo Station incident reports. Veolia environmental records.</p>	<p>Largely Compliant</p>
<p>121. The Traffic Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Director-General.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Director-General, the concluding remarks below address the effectiveness of the implementation of the Traffic Management Plan.</p>		<p>Not an auditable Condition</p>

<p>123. The Applicant must ensure no trucks or other heavy vehicles enter or exit the premises between the hours 10pm to 5am Mondays to Saturdays and 10pm to 7am Sundays and public holidays, unless otherwise provided in the Traffic Management Plan approved by the Director-General.</p>	<p>Documentation reviewed in the audit shows that the Traffic Management Plan approved by Director General allows for 24 hour operation of the Terminal.</p>	<p>Traffic Management Plan, Feb 2007 – Revision J.</p>	<p>Compliant</p>
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**Implementation and Effectiveness of the Traffic Management Plan:**

The audit found that the Traffic Management Plan was largely but not fully effective in ensuring that all traffic movements were consistent with the Conditions of Development Consent. There were 15 traffic infringements – for incorrectly turning onto or off of Parramatta Road. This is out of a total of 63 000 vehicle movements in the period.

The audit found the site conditions, facilities and procedures were resulting in a site where observed and traffic behaviour demonstrate that CTT is effectively managing this aspect of their operations in the overwhelming majority of instances.

The audit concluded that Veolia was aware of the extent to which the Traffic Management Plan was effective, and was continuing to expand information programs and develop new initiatives to ensure that all drivers fully complied with it.

**4.1.6 Vermin and Pest Control Plan**

Condition Number	Compliance Comments	Source Documents	Audit Finding
<p>51. The Vermin and Pest Control Plan must address, but is not necessarily limited to, the following issues:</p> <p>(a) Removing all waste from the tipping areas at the end of each day</p> <p>(b) Cleaning up all waste tipping and handling areas at the end of each day</p> <p>(c) Regular cleaning of catch drains and drainage sumps</p>	<p>Each of these specific requirements was found to be adequately addressed in the Vermin and Pest Control Plan, except for the following:</p> <p>Conditions a and b: these requirements are not reflected in the plan, and are probably not feasible given the 24 hour nature of operations. In practice</p>	<p>Vermin and Pest Control Plan, Feb 2007 – Revision K.</p> <p>Various CTT procedures.</p>	<p>Compliant</p>

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<p>(d) Minimising onsite waste storage and handling</p> <p>(e) Maintaining any bird deterrent measures such as hanging wires</p> <p>(f) Routine inspection and action for potential vector habitats</p> <p>(g) Using commercial vector control specialists</p> <p>(h) Conducting routine litter patrols to collect trash on site, around the perimeter, on immediately adjacent properties and on approach roads.</p>	<p>the intent of these clauses is being satisfied as all waste is removed from the tipping floor well within 24 hours of being tipped, and the tipping and handling areas are cleaned daily.</p>		
<p>115. The design of the terminal building and associated waste handling facilities shall incorporate such reasonable measures to eliminate or minimise the potential for birds, rodents, flies and other pests to congregate at the development. Consideration shall be given to incorporating the following measures</p> <p>(a) sealing surfaces to prevent moisture and odour absorption</p> <p>(b) elimination of crevices where waste, moisture and vermin can accumulate</p> <p>(c) providing screening of the ventilation openings in the building</p> <p>(d) eliminating horizontal surfaces where birds can congregate</p> <p>(e) minimising horizontal ledges where dust and litter can</p>	<p>Audit inspections and other inspection records confirmed that the terminal has been designed and is operated in a manner that has achieved compliance with this condition.</p>	<p>Audit inspections. Environmental files.</p>	<p>Compliant</p>

accumulate  (f) using fencing and netting to prevent wind-blown litter from escaping.			
116. The Vermin and Pest Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Director-General.	Whilst the audit cannot comment regarding the satisfaction held by the Director-General, the concluding remarks below address the effectiveness of the implementation of the Vermin and Pest Control Plan.		Not an auditable Condition
117. The Applicant must take all practicable measures to prevent the attraction and infestation of the premises with vermin and pests.	Audit inspections and review of records confirmed that this condition is being satisfied.	Vermin and Pest Control Plan, February 2007 – Revision K.  Veolia Environmental files.	Compliant

#### **Implementation and Effectiveness of the Vermin and Pest Control Plan:**

The audit found that the Vermin and Pest Control Plan was sufficiently implemented and effective to ensure that vermin and pests were properly controlled at the site. There was no observed or reported vermin or pest infestations.

As the site operates 24 hours per day, there is no 'end of day' at which to undertake clean-up activities. Rather, the actual rubbish management procedures are considered appropriate, as wastes are removed from the tipping floor well inside 24 hours, and the floor is cleaned daily.

The audit found the site conditions, facilities and procedures were resulting in a site where observed and reported incidence of vermin pests demonstrate that CTT is effectively managing this aspect of their operations.

#### **4.1.7 Stormwater Management Plan**

<b>Condition Number</b>	<b>Compliance Comments</b>	<b>Source Documents</b>	<b>Audit Finding</b>
52. The Stormwater Management Plan must describe the post construction	Each of these specific requirements was found to be adequately	Stormwater Management Plan, Feb 2007 – Revision	Compliant

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measures to be employed to operate and maintain the stormwater controls at the premises in a manner that minimises the pollution of waters.	addressed in the Stormwater Management Plan.	I. Various CTT procedures.	
99. Except as may be expressly provided by a licence under the Protection of the Environment Operations Act 1997 in relation of the development, section 120 of the Protection of the Environment Operations Act 1997 must be complied with and in connection with the carrying out of the development.	The audit found that waters at the site are properly managed to ensure compliance with this condition.	Site inspection and audit observations.	Compliant
100. Any water that comes into contact with waste at the premises must be directed to the leachate collection system.	The site has a comprehensive water collection and segregation system.	Site inspection.	Compliant
102. Stormwater pollution controls must be implemented prior to and for the duration of the operation of the development. The controls shall be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the Scheme shall be consistent with the guidance contained in Managing Urban Stormwater: Council Handbook (available from the EPA). The controls shall incorporate minimum levels of treatment in the following table:	There was no change to the systems during the audit period.	Site inspection.	Compliant

Development component	Minimum level of stormwater treatment
Undeveloped sections of access road	Existing overland flow to Duck River
Roof water	On-site detention
Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units	First flush system, GPT, oil and grease separation, on-site detention

**Implementation and Effectiveness of the Stormwater Management Plan:**

The audit found that the Stormwater Management Plan was sufficiently implemented and effective to ensure that activities at the site do not result in pollution of waters.

The audit found the site conditions, facilities and procedures were resulting in a site where observed and reported pollution of waters was not occurring. Recommendations from the previous audit were incorporated into the updated Stormwater Management Plan.

**4.1.8 Site Contamination and Noise Management Plans**

Condition Number	Compliance Comments	Source Documents	Audit Finding
53. The Site Contamination Management Plan must include any actions recommended in the environmental report by the site auditor that apply to operation stage activities.	The Site Contamination Management Plan addressed the auditor's recommended actions.	Site Contamination Management Plan, February 2007 Revision F  Correspondence from Environ.	Compliant
54. The Noise Management Plan shall be drafted in consultation with the rail operator for operation of the rail siding adjacent to the waste packaging terminal for the rail haulage services for Collex. The plan is to be submitted to Auburn Council. The plan must address the objective of mitigating operational rail noise from operations directly attributable to the loading and unloading of containers and associated rail operation on the siding adjacent to the Collex	Each of these specific requirements was found to be adequately addressed in the Noise Management Plan.	Noise Management Plan – Rail Operations Feb 2007 Revision E.  Noise Management Plan – Transfer Terminal Feb 2007 Revision G	Compliant

<p>terminal, relating to the movement of containers from the Collex packing terminal. The plan must also identify reasonable noise mitigation strategies:</p> <ul style="list-style-type: none"> <li>a) Upgrade to hardstand areas utilised for loading and unloading of trains and rail track upgrade where feasible;</li> <li>b) Resurfacing of hardstand area with appropriate noise mitigation materials;</li> <li>c) Track repair and realignment where feasible and appropriate to minimise forklift travel having regard for other rail operations and heritage issues;</li> <li>d) Container management protocols to minimise movement and handling of containers with an emphasis on noise mitigation;</li> <li>e) Identification and utilisation of forklifts to minimise noise impacts and implement measures to minimise use of reversing alarms at night;</li> <li>f) Establishment of a noise complaints procedure;</li> <li>g) Investigating the scheduling of trains outside critical hours subject to metropolitan curfew, Rail Infrastructure Corporation slot management and rail operational considerations;</li> <li>h) Ongoing community consultation; and</li> <li>i) Employee education in noise mitigation practices.</li> </ul>			
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<p>105. The Applicant shall implement the Noise Management Plan, to the satisfaction of the Director-General.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Director-General, the concluding remarks below address the effectiveness of the implementation of the Noise Management Plan.</p>		<p>Not an auditable Condition</p>
<p>106. <i>(Amended)</i> Except as permitted under condition 25A, all construction work at the premises that creates audible noise at residential premises must only be conducted between 7:00am and 5:00pm on Mondays to Fridays and between the hours of 8:00am and 5:00pm on Saturdays. There shall be no construction activities on Sundays or public holidays. The allowable construction times may be varied by an environment protection licence.</p>	<p>As per condition 25A</p>		<p>Compliant</p>
<p>108. Noise generated at the premises during the operation stage must not exceed the noise limits presented in the table below:</p>	<p>Construction noise monitoring was conducted at the most sensitive location off-site. Noise was 10dB(A) higher than operational threshold limits. It was then assumed that operational noise would be lower than construction noise, suggesting that operational noise was below required levels. However, there is no specific requirement for noise monitoring</p>	<p>Annual Environmental Management Report 2007.</p>	<p>Compliant</p>

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	frequency. Based on the absence of complaints, the facilities present on-site and the distances to residential areas, it is considered that noise emissions would have been in compliance with this condition.		
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Noise Limits (dB(A))

Location	Day	Evening	Night	
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	LA <sub>1</sub> (1 minute)
First St, Granville (nearest residence)	44	38	39	56
10 Hampstead Rd, Auburn	40	38	38	54
17 Cumberland Rd, Auburn	41	39	39	52

For the purpose of this condition:

- (a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays
- (b) Evening is defined as the period from 6pm to 10pm
- (c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays
- (d) L<sub>Aeq</sub>(15minute) is defined as the equivalent continuous ‘A’ weighted sound pressure level- the energy average of the noise measured over a 15 minute period
- (e) LA<sub>1</sub> (1 minute) is defined as the sound pressure level exceeded for one percent of a 1 minute measurement period.

108A. ( <i>Amended</i> ) Within three months of the commissioning of the forced ventilation system subject to MOD-133-11-2006, or as may be agreed by the Director-General, the Applicant shall conduct and submit to the Director-General and the DEC a noise assessment of the terminal whilst operating under normal conditions including operation of the forced ventilation system. The	Not applicable for the audit period – forced ventilation system subject to MOD-133-11-2006 was not commissioned.		Not Applicable
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<p>assessment shall be conducted in accordance with the requirements of the New South Wales Industrial Noise Policy (EPA 2000) for the purpose of assessing compliance with the noise criteria described in condition 108. The assessment shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>(a) Noise monitoring</li> <li>(b) Methodologies for noise monitoring</li> <li>(c) Location of noise monitoring, and</li> <li>(d) Details of any entries in the Complaints Register relating to noise impacts.</li> </ul> <p>Subject to the results of the assessment, the Director-General may require the Applicant to conduct further investigations or implement measures aimed to achieve compliance with the noise criteria.</p>			
<p>109. Noise from the premises is to be measured at the most affected point on or within the residential boundary to determine compliance with the LAeq (15 minute) noise limits.</p> <p>Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance.</p> <p>Note: See Chapter 11 of the NSW Industrial Noise Policy.</p>	<p>Noise was measured at the nearest residential location (William St) and on-site during construction phase, no operational noise assessments were conducted during the audit period</p>	<p>Annual Environmental Report 2007.</p>	<p>Not Applicable</p>

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<p>The modification factors presented in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise level where applicable.</p>			
<p>110. Noise from the premises is to be measured at 1m from the dwelling façade to determine compliance with the LA1 (1 minute) noise limits.</p>	<p>Not applicable for the audit period – as no operational noise monitoring was conducted.</p>	<p>Annual Environmental Management Report 2007.</p>	<p>Not Applicable this audit period</p>
<p>111. The noise emission limits apply under meteorological conditions of:  (a) wind speeds up to 3 m/s at 10 metres above ground level; and/or  (b) temperature inversion conditions of up to 3 oC/100m.</p>	<p>Not applicable for the audit period – as no operational noise monitoring was conducted.</p>	<p>Annual Environmental Management Report 2007.</p>	<p>Not Applicable this audit period</p>
<p>112. The Applicant shall ensure that annual noise emission assessments of all trucks owned or operated by the Applicant or trucks the subject of a delivery contract with the Applicant are carried out. The assessment shall assess compliance with relevant noise emission requirements of ADR 28/01 or its successor. The assessment shall be made available to Auburn Council and to the Director-General within 3 weeks of the Applicant’s annual licensing report to the EPA. If any non-compliance with the relevant noise emission requirements is identified, the assessment report shall recommend mitigation measures with the objective of</p>	<p>Veolia has commissioned studies and corresponded with the DoP regarding the inappropriateness of this condition. An alternative condition has been proposed by Veolia and correspondence is ongoing regarding the application of this condition.</p>	<p>Annual Environmental Management Report 2007.  Veolia/DoP correspondence file.</p>	<p>Non Compliant</p>

<p>ensuring compliance with relevant noise emission requirements of ADR 28/01.</p>			
<p>113. The Applicant shall implement an induction program for all drivers of trucks that deliver waste to the waste terminal with the objective of mitigating noise impacts of trucks entering and leaving the waste terminal, including driving procedures and throttle management. The program is to be designed in consultation with Auburn Council and is to emphasise the importance of noise emission control, driving and operating practices and procedures for night time activities.</p>	<p>The audit reviewed the induction program and induction records, and found it to be compliant with this condition.</p>	<p>Induction material. Induction Records.</p>	<p>Compliant</p>
<p>114. The Applicant shall, in conjunction with the rail operator, implement an induction program for all train drivers and other rail staff dedicated to transporting containers to and from the Collex terminal area by train to Woodlawn. The program is to emphasise noise mitigation measures through "Good Neighbour" rail techniques such as notch control, idling practices, shunting speeds and engine control and shall form an integral part of the operational noise management plan.</p>	<p>Veolia advised the audit that this requirement is included in their contractual arrangement with the rail operator.</p>		<p>Compliant</p>

**Implementation and Effectiveness of the Noise Management Plan:**

The audit found that the Noise Management Plan was sufficiently implemented and effective to ensure that activities at the site do not result in noise complaints.

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The absence of noise monitoring results is considered appropriate. However dialog must continue with the DoP until an alternative to Condition 112 is agreed to. Until that happens the CTT is non-compliant with this condition.

The audit found the site conditions, facilities and procedures were resulting in a site where observed and reported noise levels were not excessive.

**4.1.9 General Conditions**

Condition Number	Compliance Comments	Source Documents	Audit Finding
<p>55. The Applicant shall employ or contract a suitably qualified Environmental Management Representative (EMR) throughout the duration of the development. The EMR shall:</p> <p>(a) be the principle person responsible for overseeing environmental management of the development and supervision of environmental services</p> <p>(b) have the authority to stop work if an adverse impact on the environment has occurred or is likely to occur</p> <p>(c) be responsible for the certification of all environmental management plans and procedures</p> <p>(d) be responsible for considering and advising on matters specified in the Conditions of Consent and compliance with such matters</p> <p>(e) oversee the receipt of, and response to, complaints about the environmental performance of the development</p> <p>(f) be present on-site during any</p>	<p>Audit investigations confirmed that there was an appropriately appointed and empowered EMR during the audit period (Peter Nicholas)</p>	<p>Site interview</p>	<p>Compliant</p>

<p>critical construction or operational activity as defined in the relevant Environmental Management Plan</p> <p>(g) be a member of the Community Consultative Committee for the development.</p>			
<p>56. The Applicant shall prepare and implement a detailed Environmental Monitoring Program for the proposed development. The program shall include, but is not necessarily limited to, all the monitoring required by this Consent, the environment protection licence, the EMP (Construction Stage) and the EMP (Operation Stage) for the development. The program must:</p> <p>(a) Identify the environmental issues to be monitored</p> <p>(b) For each issue, indicate whether its monitoring is required by this Consent, the environment protection licence, the EMP (Construction Stage), the EMP (Operation Stage), or by another instrument</p> <p>(c) Set standards and performance measures for each issue</p> <p>(d) Describe in detail how each issue is to be monitored, who will conduct the monitoring, how often the monitoring will be conducted, and how the results of the monitoring will be recorded and reported to the Director-General and other</p>	<p>Each of these specific requirements was found to be adequately addressed in the Terminal Testing and Inspection Schedule.</p>	<p>Terminal Testing and Inspection Schedule</p>	<p>Compliant</p>

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<p>relevant authorities</p> <p>(e) Indicate the actions taken and procedures to be followed if any non-compliance is detected.</p>			
<p>57. All monitoring required by this Consent must be:</p> <p>(a) conducted by suitably qualified persons approved by the Director-General</p> <p>(b) conducted in accordance with established standards and protocols</p> <p>(c) reported annually in the Annual Environmental Management Report.</p>	<p>The audit found that these conditions were complied with.</p>	<p>Annual Environmental Management Report 2007.</p> <p>Veolia environmental files.</p>	<p>Compliant</p>
<p>58. The Applicant shall include a report on the Environmental Monitoring Program in the Annual Environmental Management Report. The report must:</p> <p>(a) summarise the results from the Environmental Monitoring Program over the previous year</p> <p>(b) analyse the results in relation to both past performance, and the relevant standards and performance measures of the development</p> <p>(c) identify any emerging trends in the data over the life of the development</p> <p>(d) include a copy of the detailed monitoring results as an attachment.</p>	<p>The audit found that these conditions were complied with.</p>	<p>Annual Environmental Management Report 2007.</p>	<p>Compliant</p>
<p>59. Between twelve and fourteen months after the issue date of an environment</p>	<p>Each of these specific requirements was found to be adequately</p>	<p>Annual Environmental Management Report</p>	<p>Compliant</p>

<p>protection licence for the development, and annually thereafter for the duration of the development, the Applicant shall submit an Annual Environmental Management Report to the Director-General, the EPA and the Community Consultative Committee. The report shall be made available to the public on request to the Applicant. The report may be combined with the Annual Return required by the environment protection licence to be submitted to the EPA. The report must:</p> <p>(a) identify all the standards, performance measures, and statutory requirements the development is required to comply with</p> <p>(b) review the environmental performance of the development to determine whether it is complying with the standards, performance measures, and statutory requirements</p> <p>(c) identify each occasion during the previous year when the standards, performance measures, or statutory requirements have not been complied with</p> <p>(d) where any non-compliance is identified, describe the actions or measures taken to ensure compliance, who is responsible for carrying out the actions, and when the actions were (or will be) implemented</p>	<p>addressed in the Annual Environmental Management Report.</p>	<p>2007.</p>	
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<p>(e) include a summary of any complaints made about the development, and indicate the actions taken to address the complaints</p> <p>(f) include a report on the Environmental Monitoring Program as specified in this Consent.</p>			
<p>60. Every year following the date of this consent, or at periods otherwise agreed to by the Director-General, and until such time as agreed to by the Director-General, the Applicant shall arrange for an independent audit of the environmental performance of the development. The audits shall:</p> <p>(a) be conducted pursuant to ISO 14010 – Guidelines and General Principles for Environmental Auditing, ISO 14011 – Procedures for Environmental Monitoring and any specifications of the Director-General;</p> <p>(b) be conducted by a suitably qualified independent person approved by the Director-General;</p> <p>(c) assess compliance with the requirements of this consent;</p> <p>(d) assess the implementation of the EMP (Construction) and EMP (Operation) and review the effectiveness of the environmental management of the development; and</p> <p>(e) be carried out at the</p>	<p>The independent audit reports have been performed annually, as required.</p> <p>This independent audit has had the particular focus of reviewing the effectiveness of the environmental management of the development.</p>	<p>2005, 2006 and 2007 Independent Environmental Audit Reports.</p>	<p>Compliant</p>

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<p>Applicants' expense.</p> <p>The audits shall be submitted to the Director-General. The Applicant shall comply with all reasonable requirements of the Director-General in respect of any measures arising from or recommended by the audits and within such time as agreed to by the Director- General.</p>			
<p>61. The results of all monitoring and auditing required by this Consent must be made publicly available at the same time they are submitted to the Director-General.</p>	<p>As per comments for Condition 46.</p>	<p>Veolia Environmental Policy</p>	<p>Compliant</p>
<p>103. The Site Contamination Management Plan must be implemented to the satisfaction of the Director-General, prior to and for the duration of the development.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Director-General, it is noted that there were no excavation works performed on-site during the audit period that would have activated the Site Contamination Management Plan.</p>		<p>Not an auditable Condition</p>
<p>125. In relation to activities, which in the event of a disruption to operations may result in significant pollution being emitted, the Applicant must:</p> <p>(a) conduct an assessment to determine the potential internal and external causes of disruption of operations at the premises;</p> <p>(b) determine how these disruptions would impact on</p>	<p>Veolia has satisfied this condition, in their Incident Response Plan.</p>	<p>Incident Response Plan February 2007 Revision J</p>	<p>Compliant</p>

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<p>operations; and</p> <p>(c) identify the pollution that would result due to the disruption of operations and what impact the pollution would have on the health of the community and the environment.</p>			
<p>126. In relation to matters identified in the previous condition, the Applicant must prepare an Emergency Management Plan. The Plan shall address, but not necessarily be limited to:</p> <p>(a) identification of threats to the environment and/or public health that could arise in relation to the construction and operation of development. These threats may include fire, overflow, power or other utility failure, natural disaster etc;</p> <p>(b) identification of strategies to minimise and ameliorate the effects of any water pollution identified from the groundwater and surface water monitoring programs;</p> <p>(c) an estimate of the cost of implementation;</p> <p>(d) actions to effectively respond to the disruption of operations so the risk of pollution is minimised;</p> <p>(e) a communications strategy for alerting relevant agencies and the potentially affected community in the event of the disruption to operations leading to significant pollution; and</p>	<p>Veolia has satisfied this condition, in their Incident Response Plan.</p>	<p>Incident Response Plan February 2007 Revision J</p>	<p>Compliant</p>

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<p>(f) ensuring that all relevant employees are familiar with the emergency management plan.</p> <p>The Applicant should regularly review the adequacy of the plan obtaining expert advice as required.</p> <p>Note: When developing this emergency plan, consideration should be given to the possible integration with current emergency management plans for the entire site.</p>			
<p>128. The Applicant shall implement the Landscaping Plan in consultation with Auburn Council and to the satisfaction of the Director-General.</p>	<p>Whilst the audit cannot comment regarding the satisfaction held by the Director-General, the standard of landscaping observed during the audit was considered sufficient to satisfy this condition.</p>	<p>Audit inspection</p>	<p>Not an auditable Condition</p>
<p>129. The Applicant shall not construct any new buildings, hardstand, storage areas or vehicle manoeuvring areas within 30 metres of the Duck River Mean High Water Mark (as measured horizontally), to allow for the establishment of a viable riparian zone and multi-purpose recreation path.</p>	<p>No works were conducted in this area during the audit period.</p>	<p>Audit inspection</p>	<p>Compliant</p>
<p>134. The Applicant shall establish and maintain a Community Consultative Committee for the whole duration of the development, and take all reasonable steps to ensure that the first meeting is held prior to commencement of construction. Selection of representatives shall be agreed</p>	<p>The audit established that this condition is being complied with.</p>	<p>Meeting Minutes and file</p>	<p>Compliant</p>

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<p>by the Director-General and the appointment of an independent Chairperson shall be to the satisfaction of the Director-General in consultation with the Applicant, Parramatta City Council and Auburn Council. The Committee shall include two representatives from the Applicant (including the Environmental Officer), four community representatives and a representative from each Council. Representatives from relevant government agencies (including Planning NSW) may be invited to attend meetings of the Committee as required. The Committee may make comments and recommendations about the implementation of the development and draft management plans, environmental plans and/or studies. The Applicant shall ensure that the Committee has access to the necessary plans and/or studies for such purposes. The Applicant shall consider the recommendations and comments of the Committee and provide a response to the Committee and the Director-General.</p>			
<p>135. The Applicant shall, at its own expense:</p> <ul style="list-style-type: none"> <li>(a) provide appropriate facilities for meetings of the Committee;</li> <li>(b) nominate a representative to attend all meetings of the Committee;</li> </ul>	<p>The audit established that this condition is being complied with.</p>	<p>Veolia Committee Files</p>	<p>Compliant</p>

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<p>(c) provide to the Committee regular information on the progress of the work and monitoring results;</p> <p>(d) promptly provide to the Committee such other information as the Chairperson of the Committee may reasonably request concerning the environmental performance of the development; and</p> <p>(e) provide reasonable access for site inspections by the Committee.</p>			
<p>136. The Applicant shall establish a trust fund to be managed by the Chairperson of the Committee to facilitate functioning of the Committee, and pay \$2000 per annum to the fund for the duration of the development. The payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. The Applicant shall also contribute reasonable funds for payment of the independent Chairperson, to the satisfaction of the Director-General.</p>	<p>The audit established that this condition is being complied with.</p>	<p>Veolia Committee Files Veolia financial records</p>	<p>Compliant</p>
<p>137. Prior to the commencement of construction, or as otherwise approved by the Director-General in consultation with Auburn Council, the Applicant shall take all reasonable steps to negotiate an agreed outcome with Auburn</p>	<p>The audit established that all payments required by this condition were complied with.</p>	<p>Veolia Committee Files Veolia financial records</p>	<p>Compliant</p>

<p>Council for an appropriate level of contribution (financial or in-kind) towards mitigating the social and community impacts resulting from the construction and operation of the development. The contribution shall provide, but not necessarily be limited to, the following:</p> <p>(a) the payment of \$50,000 (unless otherwise agreed to by the Director-General) to Auburn Council as a contribution to the drafting of a masterplan for the entire Clyde Marshalling Yards</p> <p>(b) appropriate monetary lump sum contributions to be negotiated with Auburn Council for the purposes</p> <p>of:</p> <ul style="list-style-type: none"> <li>the widening of the Western Overbridge;</li> <li>establishing a vegetated riparian restoration zone along the eastern bank of Duck River from Parramatta Road to the Clyde railway bridge;</li> <li>establishing a multi-purpose recreation path adjacent to the riparian zone from Parramatta Road to the Clyde railway bridge; and</li> <li>the development and installation of heritage interpretation signage along the multi-purpose recreation path regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and</li> </ul>			
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<p>associated pre-use of the area occupied by the development.</p> <p>(c) ongoing or as otherwise agreed to financial contributions proportional to the tonnage throughput of the terminal for the purpose of local community enhancement projects and/or activities in accordance with a community enhancement plan to be prepared by Auburn Council to reflect community priorities and needs. Should such a negotiated outcome not be reached, the Applicant shall abide by the requirements of the Director-General concerning community enhancement contribution in light of an independent investigation to establish such contribution. Such investigation is to be carried out by an independent person(s) to be appointed by the Director-General in consultation with the Applicant and Auburn Council.</p> <p>The commencement of any construction on-site shall not proceed unless the above outcomes have been agreed or otherwise approved by the Director-General in consultation with Auburn Council.</p>			
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**4.2 CONDITIONS NOT RELEVANT TO AUDIT PERIOD**

Condition	Comment
<p>2. (Amended) In the event of any inconsistency between:</p> <p>(a) the conditions of this consent and any document listed from condition 1(a) to 1(e) inclusive, the conditions of this consent shall prevail to the extent of the inconsistency; and</p>	<p>Noted</p>

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<p>(b) any document listed from condition 1(a) to 1(e) inclusive, the most recent document shall prevail to the extent of the inconsistency.</p>	
<p>15. The date of commencement shall be the date that the Applicant determines to proceed with the development. The Applicant must provide the date of commencement in writing to the Director-General before commencement of the development</p>	<p>Not Audited – relevant in prior audit period</p>
<p>Pre-Construction Compliance Report</p> <p>16. At least two weeks prior to commencement of construction (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General a report detailing the level of compliance with each Condition of this Consent that relates to pre-construction activities. The report shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>(a) the identification of each relevant Condition</li> <li>(b) the details of any study or report required by the relevant Conditions</li> <li>(c) the level of compliance with each relevant Condition</li> <li>(d) the reasons for any non-compliance</li> <li>(e) any action taken or proposed to make good any non-compliance, and</li> <li>(f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions</li> </ul>	<p>Not Audited – relevant in prior audit period</p>
<p>Pre-Operation Compliance Report</p> <p>17. At least one month prior to the receipt of uncontainerised waste at the premises (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General a report detailing the level of compliance with each Condition of this Consent that relates to pre-operation activities. The report shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>(a) identification of each relevant Condition</li> <li>(b) the details of any study or report required by the relevant Conditions</li> <li>(c) the level of compliance with each relevant Condition</li> <li>(d) the reasons for any non-compliance</li> <li>(e) any action taken or proposed to make good any non-compliance, and</li> <li>(f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions</li> </ul>	<p>Not Audited – relevant in prior audit period</p>

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<p>23. The applicant shall obtain an environmental report prepared by a site auditor accredited under the Contaminated Land Management Act 1997 to determine the nature and extent of contamination at the site and any investigation and/or remediation necessary before the land is suitable for commercial/industrial use.</p> <p>Prior to construction the Applicant shall obtain written endorsement from the site auditor for the following aspects of the Site Contamination Management Plan:</p> <p>(a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination</p> <p>(b) A plan to manage dust during the construction and operational stages in a manner that protects the health of on-site and off-site personnel.</p>	<p>Not Audited – relevant in prior audit period</p>
<p>24. Prior to completion of construction, any amelioration measures required to enable a site audit statement to be issued shall be implemented.</p> <p>26. The EMP (Construction Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.</p> <p>27. The Applicant must not commence any works until the EMP (Construction Stage) has been completed and submitted to the Director-General.</p> <p>28. The Applicant shall certify the EMP (Construction Stage) as being in accordance with the Conditions of Consent prior to submitting it to the Director-General.</p> <p>29. The EMP (Construction Stage) shall be made publicly available.</p>	<p>Not Audited – relevant in prior audit period</p>
<p>30. The EMP (Construction Stage) shall include, but is not necessarily limited to, the following plans:</p> <p>(a) Soil and Water Management Plan</p> <p>(b) Construction Noise Management Plan</p> <p>(c) Dust Management Plan</p> <p>(d) Construction Waste Management Plan</p> <p>(e) Site Contamination Management Plan</p> <p>(f) Landscaping Plan</p> <p>31. The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Construction Stage).</p> <p>32. All site personnel (including contractors and subcontractors) during the construction stage must be inducted and trained to ensure compliance with the EMP (Construction Stage).</p>	<p>Not Audited – relevant in prior audit period</p>

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<p>33. The Soil and Water Management Plan (SWMP) must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities. The SWMP must be prepared in accordance with the requirements for such plans outlined in Managing Urban Stormwater: Soils and Construction (available from the Department of Housing).</p>	<p>Not Audited – relevant in prior audit period</p>
<p>34. The Construction Noise Management Plan must address, but is not necessarily limited to, the following issues:</p> <ul style="list-style-type: none"> <li>(a) compliance standards</li> <li>(b) community consultation</li> <li>(c) complaints handling monitoring/system</li> <li>(d) site contact person to follow up complaints</li> <li>(e) mitigation measures, including details of any noise attenuation measures</li> <li>(f) the design and operation of the proposed mitigation methods demonstrating best practice</li> <li>(g) construction times</li> <li>(h) contingency measures where noise complaints are received</li> <li>(i) monitoring methods and programs.</li> </ul>	<p>Not Audited – relevant in prior audit period</p>
<p>35. The Dust Management Plan must include, but not necessarily be limited to, control strategies to achieve compliance with dust emission limits in this Consent and any environment protection licence.</p>	<p>Not Audited – relevant in prior audit period</p>
<p>36. The Construction Waste Management Plan must include, but not necessarily be limited to, strategies to ensure any waste generated during the construction stage is recycled, reused or disposed of in a lawful manner.</p>	<p>Not Audited – relevant in prior audit period</p>
<p>37. The Site Contamination Management Plan must include, but not necessarily be limited to, the following issues that apply to construction stage activities:</p> <ul style="list-style-type: none"> <li>(a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination</li> <li>(b) A plan to manage dust in a manner that protects the health of on-site and off-site personnel.</li> </ul>	<p>Not Audited – relevant in prior audit period</p>
<p>38. The Landscaping Plan must include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>(a) the recommendations of the Visual Assessment Study in the EIS for</li> </ul>	<p>Not Audited – relevant in prior audit</p>

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landscaping and planting of native species, and  (b) commitments by the Applicant for an appropriate financial or in-kind contribution towards landscaping the Parramatta Road frontage to soften and screen the access point as viewed from Parramatta Road.	period
44. The Applicant shall certify the EMP (Operation Stage) as being in accordance with the Conditions of Consent prior to seeking approval of the Director-General.	Not Audited – relevant in prior audit period
89. Deleted as per MOD-133-11-2006	
101. The approved Soil and Water Management Plan must be implemented prior to and for the duration of the construction stage of the development.	Not Audited – relevant in prior audit period
104. The Applicant shall implement the approved Construction Noise Management Plan, to the satisfaction of the Director-General.	Not Audited – relevant in prior audit period
122. Prior to the commencement of construction activities, the Applicant shall demonstrate to the satisfaction of the Director-General, it has reasonable arrangements in place in respect of its use of the right of carriageway, concerning traffic sharing, protection of underground and above-ground services in the vicinity of the carriageway and the potential impacts on the existing weighbridge.	Not Audited – relevant in prior audit period
124. The Applicant shall fund a traffic study, to be conducted by an independent, suitably qualified person. The study is to be completed and submitted to the Director-General within 14 months from commencement of operations, review the operation of the access road in the first 12 months of the development and recommend any future actions to ensure sufficient future capacity of the access road. The Applicant shall provide a reasonable financial contribution towards any upgrade of the access road recommended by the study.	Not Audited – relevant in prior audit period
127. The Applicant shall consult with the NSW Fire Brigades and install a fire main and hydrants as required by the Fire Brigades. The system shall comply with AS 2419.	Not Audited – relevant in prior audit period
130. The Applicant shall prepare at its own expense a site specific Riparian Zone Management Plan to address the issues contained in Auburn’s draft Duck	Not Audited – relevant in

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<p>River Riparian Management Plan. The Plan shall be submitted to Auburn Council’s Director Service Planning prior to the issue of the Occupation Certificate, or as otherwise agreed to by Auburn Council. Any riparian restoration activities undertaken by the Applicant shall, where appropriate, be consistent with but not necessarily limited to the activities listed in Attachment 3.</p>	<p>prior audit period</p>
<p>131. The Applicant shall facilitate as appropriate and as required by the Director-General, the provision of a 3.0 metre wide reinforced concrete multi-purpose recreation path along the landward side of a 30 metre riparian/public open space dedication zone between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.</p>	<p>Not Audited – relevant in prior audit period</p>
<p>132. The Applicant shall facilitate as appropriate and as required by the Director-General and/or contribute to the dedication to Auburn Council of land incorporating the riparian restoration zone and multi-purpose recreation path between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.</p>	<p>Not Audited – relevant in prior audit period</p>
<p>133. The Applicant shall contribute to the development and installation of heritage interpretation signage in consultation with Auburn Council, regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and associated pre-use of the area occupied by the development. The heritage signage is to be approved by Auburn Council and installed within 6 months of commencement of the approved use or as otherwise agreed to by Auburn Council.</p>	<p>Not Audited – relevant in prior audit period</p>

**5 CONCLUSIONS**

OTEK undertook an independent environmental audit of the Clyde Transfer Terminal at 322 Parramatta Road, Clyde, NSW for the audit period 16<sup>th</sup> January 2007 to 15<sup>th</sup> January 2008. The audit was commissioned to satisfy a requirement of the Conditions of Development Consent that was issued for the facility. The audit identified the level of compliance with the Conditions of Development Consent, and considered the effectiveness of the environmental management practices at the site.

In the audit period, the CTT received approximately 406,000 tonnes of class 1 solid wastes (now classified as general solid waste – putrescible).

The Conditions of Development Consent list 137 specific requirements (Conditions) that the CTT must comply with. In April 2007, a notice of amendment was issued with 22 new amendments deleting, replacing, or altering existing conditions. This resulted in a total of 133 auditable conditions. Of these, 43 were not auditable or applicable to this audit period.

Of the 88 relevant, auditable Conditions, the CTT was found to be in compliance with 75 Conditions, largely compliant with 9 Conditions and non-compliant with 4 Conditions. The four non-compliant Conditions related to:

- Condition 9 – allowable volumes of waste;
- Condition 75 – use of odour neutraliser;
- Condition 78 – reporting monitoring results within eight weeks; and
- Condition 112 – annual noise assessment of all trucks.

Two of these non-compliant conditions are currently being addressed, or have been addressed in full by Veolia:

- The DECC and DoP were notified of the exceedence in allowable waste. The exceedence was due to the temporary closure of the Auburn WSN facility.
- CTT has undertaken a number of studies in order to identify a way of achieving compliance with Condition 112. A modification to Condition 112 is being sought, and various pilot tests are being conducted.

The non-compliance relating to the odour neutraliser was reported in the previous audit period. Discussions between Veolia and the DoP have not clarified the intent of this condition, however Veolia (and the auditors) interpret this condition to indicate large scale use of deodorisers to mask the industrial odours of the processing floor. Veolia's use of Deodour Air 100 is strictly for Occupational Health reasons (maintaining comfort of workers). OTEK recommends that Veolia request confirmation from the DoP that use of this spray is allowed under condition 75.

The non-compliance relating to the reporting of monitoring results within 8 weeks reflects a different interpretation of the condition. The auditors interpret this amended condition to suggest all odour monitoring results should be forwarded within eight weeks, however, Veolia staff have interpreted this to mean only those monitoring results outlined in condition 77. This has now been brought to the attention of Veolia and further results will be forwarded on within the stated time period.

The following Environmental Management Plans were found to be effectively implemented, as evaluated by the degree of environmental performance achieved by each plan:

- Dust Management Plan;
- Vermin and Pest Control Plan;
- Stormwater Management Plan;
- Site Contamination Management Plan; and
- Incident Response Plan.

The following Environmental Management Plans were found to be implemented to an extent that resulted in less than 100% compliance with stated objectives, as evaluated by the degree of environmental performance achieved by each plan:

- Waste Management Plan;
- Traffic Management Plan; and
- Noise Management Plan.

The implementation of the Waste Management Plan was not fully effective, as one load of unauthorised waste was delivered to the terminal. This is out of a total of more than 63,000 deliveries. Appropriate remedial measures were implemented which ensured these unauthorised wastes were segregated and disposed of to their proper destinations. Unauthorised wastes were not forwarded to the Woodlawn Bioreactor. In addition CTT continues to explore and implement existing and new measures to ensure greater compliance with the Waste Management Plan by its customers.

A small number of vehicles turned onto or off of Parramatta Road in breach of the Traffic Management Plan. Whilst the Traffic Management Plan was effective to the extent that the number of turning breaches is small, the Plan cannot be considered to be fully effectively implemented whilst breaches continue to occur. CTT continues to implement a range of measures, and continues to explore new measures, to increase the effectiveness of the Traffic Management Plan.

The inability to measure truck noise levels on-site is an ongoing failing of the Noise Management Plan. It is expected that the performance of this plan will improve when a modified Condition 112 is agreed to.

The audit report also lists the following areas where environmental performance could be further improved:

- Condition 22 – ensuring consultants list the time of sample collection and name of the person collecting the sample during routine monitoring;
- Condition 40 – ensuring reference to waste classification is updated; and
- Condition 98 – better recording operating conditions inside the terminal building at the time of any odour or dust monitoring event (this request must be passed on to consultants).

## 6 **LIMITATIONS**

The conclusions provided in this Environmental Audit Report are relevant to the nature of the activities undertaken by Veolia Environmental Services Australia Pty Ltd at 322 Parramatta Road, Clyde, NSW, the facilities present at the time of the audit and the statutory obligations currently enacted as at the date of this report.

We do not make any representation or warranty that the conclusions in this report will be applicable in the future as there may be changes to legislation, the operating requirements of Veolia Environmental Services Australia Pty Ltd, the condition of the site, or other factors that would affect the conclusions contained in this report.

OTEK has used a degree of skill and care ordinarily exercised by reputable members of our profession practicing in the same or similar locality. Conclusions are based on representative information gathered during the site inspection of the Clyde Transfer Terminal, and additional information provided by Veolia Environmental Services staff.

This report has been prepared for Veolia Environmental Services Australia Pty Ltd and the Department of Planning and for the specific purpose to which it refers. No responsibility is accepted to any third party and neither the whole of the report or any part or reference thereto may be published in any document, statement or circular nor in any communication with third parties without our prior written approval of the form and context in which will appear. Approval is given for the report to be made available to the public.

This report and the information contained in it is the intellectual property of OTEK. Veolia Environmental Services Australia Pty Ltd is granted an exclusive licence for the use of the report for the purpose described in the report.

**APPENDIX A**  
**PHOTOLOG**

**PHOTOGRAPHIC LOG**  
CLYDE TRANSFER TERMINAL, CLYDE, NEW SOUTH WALES

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Photo 1: Stormwater retention

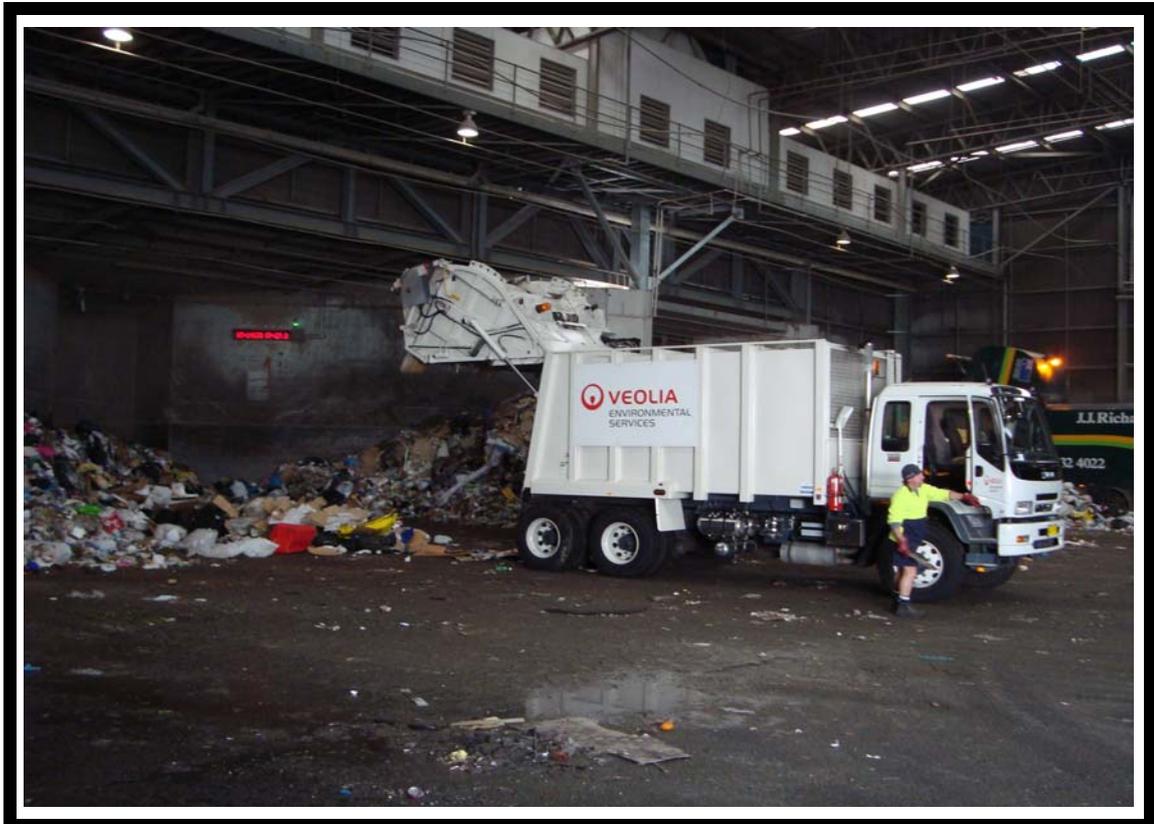


Photo 2: Unloading residential waste into compactor loading area

**PHOTOGRAPHIC LOG**  
CLYDE TRANSFER TERMINAL, CLYDE, NEW SOUTH WALES

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Photo 3: Newly commissioned forced air ventilation system



Photo 4: Containers being loaded onto rail car for transport to Woodlawn Bioreactor

## PHOTOGRAPHIC LOG

CLYDE TRANSFER TERMINAL, CLYDE, NEW SOUTH WALES

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Photo 5: Container with compacted waste 'slug' being tidied prior to transfer to rail car.