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2019 Independent Environmental Audit
Veolia Environmental Services Australia
Banksmeadow Transfer Terminal

Jackson Environment and Planning Pty Ltd
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The 2019 Independent Environmental Audit Report has been prepared by the following Staff / Contractors of Jackson Environment and Planning Pty Ltd, Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060:

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We declare that:

The report contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and the information contained in the audit is neither false nor misleading.

Report version	Authors	Date	Reviewer	Approved for issue	Date
Draft	R. Loemker, Dr M. Jackson, A. Parsons	29/04/19	A.Parsons	Dr. M.Jackson	30/04/19
Final	R. Loemker, Dr M. Jackson	20/05/19	Dr M. Jackson	Dr M. Jackson	20/05/19

Executive Summary

This report presents the findings of an Independent Environmental Audit that was conducted to assess the environmental performance of Veolia Environmental Services Australia's Banksmeadow Transfer Terminal, located at 34-36 McPherson Street, Banksmeadow for the period between April 2016 and January 2019.

The audit was conducted by Jackson Environment and Planning Pty Ltd in March 2019, as required under Conditions 6 and 7 (Schedule 4) of the Development Consent (SSD5855). The scope of the Audit was limited to the period since previous audit (April 2016) to January 2019 and was conducted in accordance with the Department of Planning and Environment (2018) *Independent Audit – Post Approval Requirements*. The audit included an assessment of compliance with the following development modifications:

- Modification to allow an additional six months to complete road upgrade works to the intersection at Beauchamp Road and Perry Street; and to prevent the emission of offensive odours and leachate leaking from waste containers (SSD5855 Mod 1).

The audit also included an assessment of compliance with management plans in place, and a comparison of predictions in the original Environmental Impact Statement and subsequent modifications to actual performance. The Audit included environmental performance requirements under Environmental Protection Licence (20581) for the same period, as this is specifically required under Schedule 4, Condition 6(c) of SSD5855.

An assessment of the Actions recommended in the 2016 Independent Environmental Audit conducted Ramboll Australia Pty Ltd was carried out during this audit and it was found that all actions have been completed.

The 2019 audit found no non-compliances, and a small number of observations as follows:

- During the site visit conducted on the 26th March 2019, a small amount of accumulated leachate was identified in the processing building. The design of the building means that leachate drains away from the compactor chutes and across the processing building towards drains on the eastern side. The drains, fitted with fine grates, direct leachate to the leachate tanks. The odour mitigation program appeared to be fully implemented at the time of the site visit, however, an increase in sweeping of grates in the main tipping building should be considered to prevent any ponding of leachate, which can create odour.
- During the site visit, weeds were identified in the vegetated areas of the site. It is understood that there are performance issues with the current contractor which, at the time of the audit were being rectified. It is recommended that weed management, in accordance with the Landscape and Vegetation Management Plan, is resumed to avoid the continued growth and potential spread of weed within, and properties adjacent to the site.

Overall, the environmental performance of the facility is very good. Veolia operates the facility consistently and in accordance with the Operational Environmental Management Plan and sub plans as required by the development consent. There has been a significant reduction in the number of complaints since the start of the audit period (April 2016) as a result of continual improvements to the facility.

This demonstrates that the facility is being operated in an environmentally sound manner in accordance with the conditions of consent.

The Auditors note that Veolia's environmental performance has improved significantly since the 2016 due to improvements in operations and physical changes to the site.

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1. Introduction

This report presents the findings of the Independent Environmental Audit (the Audit) conducted by Jackson Environment and Planning Pty Ltd (JEP) in March 2019. Veolia Environmental Services Australia (Veolia) commissioned JEP to conduct the Audit and assess the environmental performance of Banksmeadow Transfer Terminal (BTT) located at 34-36 McPherson Street, Banksmeadow NSW for the period since previous audit (April 2016) to January 2019.

On 4th February 2019, the Department of Planning and Environment approved the audit team to undertake the audit (refer to Appendix C).

1.1. About the site

Operating under Development Consent (SSD5855) and Environment Protection Licence (EPL) No. 20581, BTT is approved to receive up 400,000 tonnes of putrescible material and 100,000 tonnes of non-putrescible material per annum. Waste that is received at BTT is compacted and containerised for transport, by rail, for resource recovery and treatment at Veolia's Woodlawn Bioreactor.

The Woodlawn Bioreactor, which is located 30 kilometres south of Goulburn and 240 kilometres southwest of Sydney, currently provides a solution for the management of Sydney's putrescible waste.

The BTT consists of the following:

- Incoming and outgoing weighbridges to check the waste type and weight of the waste being delivered to the facility;
- An enclosed warehouse style building for the unloading and handling of waste, with environmental controls such, as dust suppression and odour control systems;
- Two compaction units to load waste into fully sealed shipping containers;
- A container handling area for temporary storage and manoeuvring of full and empty sealed shipping containers prior to loading on to trains; and
- Two rail sidings for the loading of containers onto trains for rail transport to Woodlawn Bioreactor.

1.2. Operational Environmental Management

Veolia manages the environmental performance of BTT the under Operation Environmental Management Plan (OEMP)¹ which has been prepared in conjunction with the Environment Protection Licence to fulfil the requirements of the Development Conditions of Consent (COCs).

The OEMP includes the following management plans:

- Soil, Water & Leachate Management Plan;
- Waste Management Plan;
- Traffic Management Plan;
- Air Quality Management Plan;
- Noise and Vibration Management Plan;
- Landscaping and Vegetation Management Plan; and
- Emergency Response Plan.

¹ Document Code: PLA-NSW-XXX-XXX-1 dated 23 June 2016

The objectives of the OEMP are to:

- Provide an overview of the BTT operations;
- Provide guidance on compliance with relevant environmental legislation, including the Conditions of Development Consent and relating to the operational phase of the BTT;
- Provide a means of implementing appropriate mitigation measures for the key environmental issues;
- Provide a working environmental management tool to follow during the operation stage of the BTT;
- Define roles and responsibilities of the operational team;
- Provide a guide for the interaction with relevant government authorities and other relevant stakeholders, including the community during the operational phase of the BTT; and
- Provide a basis for monitoring, reporting and maintaining compliance with both Veolia and regulatory requirements for the BTT.

2. Independent Environmental Audit

2.1. Legislative Requirements

As required under Schedule 4, Conditions 6 and 7 of Development Consent (SSD 5855), an Independent Environmental Audit report is to be submitted to the Department of Planning and Environment. Specifically, Schedule 4, Condition 6 states:

Within one (1) year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:

- (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) include consultation with the relevant agencies;*
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);*
- (d) review the adequacy of any approved strategy, plan or program required under these approvals; and*
- (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.

Schedule 4, Condition 7 states:

Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

2.2. Audit Scope and Objectives

The scope of the Audit was limited to assessing the environmental performance of BTT, in accordance the COCs of SSD 5855 for the period between April 2016 and January 2019. The scope of the audit included an assessment of the following matters:

- The conditions of all relevant approvals;
- Management plan requirements;
- The requirements of relevant regulatory agencies;
- The status of the operation;
- The key regulatory risks, including past or future risks;
- The predictions of environmental impact assessments;
- The performance of the operation;
- Results from previous audits;
- Any incidents or community complaints;
- Feedback received from other regulatory agencies on the performance of the operation;
- Feedback received from the community / community consultative committee on the performance of the operation; and
- Agency policy or other focus areas.

The audit included the following development modifications:

- Modification to allow an additional six months to complete road upgrade works to the intersection at Beauchamp Road and Perry Street; and to prevent the emission of offensive odours and leachate leaking from waste containers (SSD5855 Mod 1).

Records reviewed fell within this period; however, some observations made by the Auditors relate to the period from January 2019 until the site visit conducted on the 26th March 2019. The audit was conducted in accordance with the Department of Planning and Environment (2018) *Independent Audit – Post Approval Requirements*.

The Audit also included environmental performance requirements under Environmental Protection Licence (20581) for the same period, as required under Schedule 4, Condition 6(c) of SSD5855.

An assessment of the Actions recommended in the 2016 Independent Environmental Audit conducted Ramboll Australia Pty Ltd (report dated 28 July 2016) were also carried out during the Audit.

2.3. Audit Team

In accordance with Schedule 4, Condition 6 of SSD5855 and Section 3 of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018) (the Independent Audit Requirements), Veolia presented the Audit Team to the Department of Planning and Environment and sought approval for the team put forward.

The Audit team from Jackson Environment and Planning Pty Ltd included Dr Mark Jackson (Auditor), Rylan Loemker (Auditor) and Alan Parsons (Lead Auditor).

Approval for the independent audit team was provided to Veolia on 4th February 2019. The letter of approval is provided in Appendix C.

2.4. Methodology

The Independent Environmental Audit was conducted in accordance with the Independent Audit Requirements and ISO 19011 *Guidelines for Auditing Management Systems* (2018)². The Audit involved the following stages.

- **Audit initiation** – Documents relating to the Audit period between April 2016 and January 2019 as well as the findings of previous audit were requested;
- **Document review** – Received documentation was reviewed for the purpose of developing the Audit plan of what will be audited;
- **Audit plan** – An audit plan was developed outlining what would be audited, who would do the auditing, when it would happen and who would be audited;
- **Onsite audit** – The onsite audit began with an opening meeting to make introductions, confirm the scope and extent of the Audit and discuss the schedule. Following the meeting, documents immediately presented by Veolia were reviewed to gather relevant information that might not have been available beforehand. The auditors then commenced the Audit by interviews and collecting the records / observations that demonstrated whether the processes meet the Development Consent conditions and EPL requirements. Audit findings and any audit conclusions were presented at the closing meeting; and
- **Audit Report (this report)** – The final findings will be formally written and distributed in an audit report.

² ISO 19011:2018 *Guidelines for Auditing Management Systems* (2018) replaces ISO 14010:1996 Guidelines for environmental auditing

2.4.1. Compliance Assessment Criteria

Compliance has been assessed using the Independent Audit Requirements (Table 2.1).

Table 2.1. Compliance assessment criteria (Source: DPE [2018] *Independent Audit Post Approval Requirements*).

Assessment	Criteria
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

3. Audit Findings

3.1. Agency and community consultation

Veolia regularly attends the Botany Industrial Park Community Consultative Committee (BIPCCC) meeting which is a forum that brings together the key stakeholders within and external to the Botany Industrial Park (BIP) to discuss the on-going operations of all BIP parties, on-going regulatory performance and community concerns. The BIPCCC brings together representatives from all BIP parties, the NSW Environment Protection Authority, Sydney Water, Safe Work NSW, Bayside Council and interested local business and community members.

Veolia has held a site tour to inform representatives of neighbouring businesses on implemented actions to improve odour management at the Terminal. The site tour was attended by representatives from IXOM and Huntsman Corporation which was the source of a majority of the odour complaints.

During the initial stages of operation, Veolia consulted with the NSW Environment Protection Authority and Bayside Council regarding operational compliance issues in relation to stormwater (refer to section 3.5.2) and odour (refer to Section 3.5.3). Both of these issues have since been resolved.

3.2. Compliance with the 2016 audit findings

An assessment of the actions recommended in the 2016 Independent Environmental Audit conducted Ramboll Australia Pty Ltd (report dated 28 July 2016) were carried out during this audit. The findings are presented in Table 3.1.

Table 3.1. Compliance assessment of the actions recommended in the 2016 Independent Environmental Audit conducted Ramboll Australia Pty Ltd.

Item No.	Reference	Recommendation	Timeframe for Completion/ Implementation	Action to be Taken	Date Completed
Development Consent SSD5585					
1	Condition 6 and 7 of Schedule 4	Ensure Audit due dates are recorded with a Compliance Tracking Program or equivalent (the Vault).	30 November 2016	SHEQ Governance Program and environmental tools have been developed to track audit dates. Email notifications have also been setup to alert relevant staff of upcoming events	November 2016
Observations					
2	Complaints	Ensure that the record of complaints are submitted in the EPL Annual Return	31 August 2016	Complaints are reported in the EPL Annual Return	Anually
3	PIRMP	Finalise and upload relevant parts of ERP/PIRMP on Veolia's website prior to commencing operations	31 August 2016	The Emergency Response Plan PIRMP has been updated and the PIRM manual is available on Veolia's website	August 2016
4	EPL	Continue to consult with the EPA regarding licensed discharge points to be recorded on the EPL prior to commencing operations	31 August 2016	Completed	August 2016
5	Diesel	Install improved containment and spill controls at the refueling (and tanker unloading) area adjacent to the diesel aboveground tank prior to the diesel tank becoming operational	31 August 2016, or prior to being operational, as appropriate	Installation of roof cover and bunding around fuel tank	August 2016

Item No.	Reference	Recommendation	Timeframe for Completion/ Implementation	Action to be Taken	Date Completed
Development Consent SSD5585					
6	Odour Management	Following commissioning and testing of the building ventilation system, observations for odour intensity along the site boundary should be undertaken initially on weekly basis by site personnel that are not desensitized to the odour. If the odour observations detected odour from the facility at the site boundary, the effectiveness of the ventilation system will need to be reviewed	Within two months being fully operation, or 30 November 2016 as appropriate	The weekly site inspections checklist has been amended to include weekly odour detection along the site boundary	October 2016
7	Environmental Performance	Upload the OEMP and the AEMR to the Veolia website after approval by DPE	31 August 2016	OEMP and AEMR were uploaded on Veolia website	July 2016

3.3. Compliance checklists

Compliance checklists were developed based on the conditions of consent for SSD5585, the conditions of EPL 20581 and in accordance with the *Independent Audit Guideline* and *ISO 19011 Guidelines for Auditing Management Systems* (2018). The detailed list of compliance conditions is provided in Appendix A (SSD5585) and B (EPL 20581). The compliance assessment summary is provided in Section 3.4.

3.4. Compliance with management plan requirements

Overall, the site is compliant with the management plans under the OEMP. No non-compliances were identified as summarised in Table 3.2 below. A number of observations were made during the audit and these are summarised in Section 3.5.

Two letters were issued by the NSW EPA to Veolia in the early stages of the operation of the facility relating to odour emissions and stormwater discharges, however these have since been resolved and are thus considered compliant. These are further explained in Section 3.5.2 and 3.5.3.

Table 3.2. Compliance with management plan requirements.

Management Plan	Compliance
Soil, Water & Leachate Management Plan	Compliant
Waste Management Plan	Compliant
Traffic Management Plan	Compliant
Air Quality Management Plan	Compliant
Noise and Vibration Management Plan	Compliant
Landscaping and Vegetation Management Plan	Compliant
Emergency Response Plan	Compliant

3.5. Compliance assessment summary

Veolia has demonstrated good overall compliance with the conditions of consent of SSD5585 as well as conditions of EPL 20581. During the 2019 Audit, which covers the period between April 2016 and January 2019, no non-compliances were identified, however a number of observations have been made and are summarised below.

Given the high level of compliance, the three-year audit cycle is recommended to continue.

3.5.1. Observations

3.5.1.1. Accumulated leachate in processing building

During the site visit conducted on the 26th March 2019, accumulated leachate was identified in the processing building. The design of the building means that leachate drains away from the compactor chutes and across the processing building towards drains on the eastern side. The drains, fitted with fine grates, direct leachate to the leachate tanks. At the time of the site visit, these grates were blocked with waste debris, restricting the flow of leachate.

During audit interviews, it was established that the leachate drains are clean regularly with a street sweeper as well as proprietary, non-toxic, bio-degradable product is used to breakdown grease (e.g. Simple Green).

Leachate is a leading cause of odour in waste facilities. While the odour mitigation program appeared to be fully implemented at the time of the site visit, it is recommended that Veolia increase the frequency of cleaning of the grates in the main tipping building to ensure that the leachate drains are free of debris to allow leachate to drain freely and reduce the potential of odour.

3.5.1.2. Weed management

During the site visit, weeds were identified in the vegetated areas of the site. It is understood that there are performance issues with the current contractor which, at the time of the audit were being rectified. It is recommended that weed management, in accordance with the Landscape and Vegetation Management Plan, is resumed to avoid the continued growth and potential spread of weed within, and properties adjacent to the site.

3.5.2. Invitation to show cause

On the 6th November 2017, the NSW EPA issued a show cause notice to Veolia for failure to comply with condition L2.1 of Environment Protection Licence No. 20581 by discharging over the limits stipulated in condition L2.4 from monitoring point 1.

Veolia submitted to the EPA Annual Return 92724 which reported upon compliance with licence conditions at the Premises during the period of 2 July 2016 to 1 July 2017. The Annual Return included the concentration monitoring summary for water quality Monitoring Point 1 which is located at the point of discharge of stormwater from the Premises to the McPherson St stormwater system. The highest sample values and the mean of sample values reported to the NSW EPA significantly exceeded the 100 percentile concentration limits for all monitored pollutants except pH (Condition L2.4). The NSW EPA at the believed that during these sampling events polluting discharge passed from the Premises into the McPherson St stormwater system.

Following this, Veolia implemented a number of improvements including upgrades to the leachate collection system on the building entrance ramp. After further inconsistencies in water quality results, Veolia commissioned an external stormwater consultant. On the 2 February 2018 a stormwater consultant identified stormwater backflow from the Council drain into Monitoring Point 1.

The council drain is located at the lowest point of the McPherson Street cul-de-sac and collects surface water runoff from McPherson Street and stormwater from an underground drainage line along McPherson Street. Stormwater samples collected from the council drain indicated water quality in this pit is of poor quality and contains elevated levels of Ammonia, BOD and TSS. Stormwater from the Council drain was identified to be cross-contaminating water collected at Monitoring Point 1.

Veolia contacted Bayside Council to further investigate this issue and determine a viable option for rectification. This resulted in modifications to the stormwater system to isolate the backflow from McPherson Street cul-de-sac. Since the modifications, stormwater quality results have improved and are now below the concentration limits in Condition L2.4.

3.5.3. Odour Complaints

On 16 February 2018, EPA officers undertook an odour survey of the Banksmeadow area and at approximately 11am detected a strong odour at the Ixom facility which was determined to have been emitted from the Premises. Furthermore, Neighbouring facilities had notified the EPA alleging odours from the Premises are affecting their business and staff. The EPA was provided detailed odour complaint logs and a history of odour mitigation commitments made by Veolia. These records date from 13 October 2016 to 16 February 2018.

Further correspondence from the NSW EPA dated 29 March 2018 detailed a voluntary Pollution Reduction Program (PRP) with proposed actions to improve odour management at Banksmeadow Transfer Terminal, including:

- Perform an assessment on the effectiveness of the discharge stack and provide options to improve performance;
- Perform a study to assess the efficacy of the activated carbon filter system installed on the ventilation louvre of each waste container.

Based on odour monitoring results obtained in May 2018, it was found the discharge stack was operating at optimal performance and were not further measured. However, based on the results, an additional carbon pad filter (two in total) was installed in waste container ventilation opening and the replacement frequency was increased to six-monthly (previously annual).

Additional odour mitigation works were completed at the Terminal, including:

- February 2018 – sealing up of the eastern and southern breezeways to increase air extraction from the waste shed and minimise risk of odour escaping the shed;
- April 2018 – Sealing up of the gap opening between the interface of the waste floor and compactor areas to increase air extraction from waste shed and minimise risk of odour escaping the shed;
- May 2018 – Adjustments of the extraction duct louvres to optimise air extraction from the waste shed; and
- May 2018 – Six-monthly industrial clean up service of the air extraction duct to remove dust build up.

Odour sampling conducted in May 2018 indicated that the odour emission rate had reduced by a factor of 6 times, equivalent to an odour emission factor of 63 ou.m³ /s per tonne of waste.

Since the completion of the odour mitigation actions outlined above, there had been a significant reduction in odour complaints from neighbouring businesses or residents. Veolia has proactively been contacting neighbouring groups to obtain feedback on potential off-site odour impacts during previously problematic weather conditions (south-westerly winds). These communications have confirmed the improved odour performance at the Terminal.

3.6. Compliance with environmental assessment documentation

A summary of compliance predictions in the Environmental Impact Statement documentation and in subsequent modifications is provided in Table 3.3. Overall the Site was compliant with the requirements of the Environmental Impact Statement documentation.

Table 3.3. Compliance with Environmental Impact Statement documentation.

Compliance Parameter	Compliance
The Banksmeadow TT would be designed to receive and containerise up to 400,000 t of putrescible waste for transfer via rail to the Woodlawn Eco Project site.	Compliant
The Proposal would be expected to require up to 215 trucks per day for the delivery of putrescible waste and up to 140 trucks per day for the delivery of non-putrescible waste.	Compliant
The transfer of putrescible waste from the facility would be by via rail, requiring one train per day.	Compliant
On site detention would be provided onsite to achieve Botany Bay City Council’s requirement of 20% annual exceedance probability event ‘natural condition’ detention and to offset the calculated flood storage volume of 810 m	Compliant
A 40 kL tank for stormwater storage would be provided beneath the terminal building for the purposes of washdown and toilet flushing to minimise potable water demand at the facility.	Compliant
Development of a Waste Management Plan that would be incorporated into the OEMP for the Site, which would detail waste screening processes, waste handling and loading procedures and including an Asbestos Waste Management Procedure.	Compliant
Development of an Operational Contingency Plan which would be incorporated into the OEMP and specify the procedures to be followed in the event of external or internal events that disrupt the operation of the Proposal	Compliant
A Noise Management Plan – Terminal Operations and a Noise Management Plan – Rail Operations would be developed for the Proposal, which would prescribe operational measures to minimise noise generation on site.	Compliant

Table 6-4: Predicted L_{Aeq,15min} Operational Noise Levels

Receiver	L _{Aeq,15min} (dBA) Noise Levels				Intrusiveness Criteria L _{Aeq,15min} (dBA)	Amenity Criteria L _{Aeq,Period} (dBA)	Exceedance
	Neutral Met Conditions		Adverse Met Conditions				
	Day	Eve	Night	Night	Day/Eve/Night	Day/Eve/Night	
Hillsdale Residential Receivers	34	32	34	36	50 / 50 / 50	50 / 40 / 37	Nil
Matraville Residential Receivers	35	31	35	36	50 / 50 / 50	50 / 40 / 37	Nil
Industrial Units Beauchamp Rd	61	53	59	60	n/a	65 / 65 / 65	Nil
Goodman Botany Bay Industrial Park	58	54	57	58	n/a	65 / 65 / 65	Nil
Toll Shipping	43	42	43	44	n/a	65 / 65 / 65	Nil
Orica Southland	64	64	64	64	n/a	70 / 70 / 70	Nil
Orica Botany Bay	65	64	65	65	n/a	70 / 70 / 70	Nil
Botany Building Recyclers	69	68	69	69	n/a	70 / 70 / 70	Nil

Compliant

Compliance Parameter	Compliance
The putrescible waste side of the terminal building would be enclosed, with the exception of vehicle access openings and an air extraction system. The air extraction system would service the putrescible waste and compactor area, within the northern end of the building, and would manage odour through a single exhaust point to allow for dispersion.	Compliant
The ventilation system for the putrescible waste area of the transfer terminal building would have a single vent stack that would extend to a height of 21 m with a diameter of 2.6 m and be designed to have an exit velocity from the stack of 20 m/s to ensure that the odour emissions from the facility achieve the odour criteria prescribed in the EPA Air Quality Guidelines.	Compliant
Containers used to transport putrescible waste by rail would have carbon filters installed within the air vent and rubber seals around the openings to prevent the emission of odour.	Compliant

3.7. Incidents

There were no environmental incidents recorded for the period between April 2016 and January 2018.

3.8. Agency consultation on key environmental issues

Under Condition 6(b) of Schedule 4 of SSD Consent 5855, relevant agencies are to be consulted on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, Jackson Environment and Planning consulted the NSW EPA, Bayside Council and the NSW Department of Planning and Environment.

3.8.1. NSW EPA

In a letter dated 23 April 2019, Laura Ansted, A/ Unit Head from the Waste Compliance Department of the NSW EPA provided the following matters for consideration in the Independent Environmental Audit (refer to Attachment D):

1. The operation and maintenance of the mechanical ventilation system to ensure negative pressure in the putrescible waste and compactor areas as required by condition O7.1 of EPL 20581;
2. Stormwater discharges and non-compliances with the requirements of condition L2.4 of EPL 20581 in relation to suspended solids, and the required actions or measures to rectify this issue;
3. The environmental performance of the site in relation to offensive odours and section 129 of the *Protection of the Environment Operations Act 1997*, and the effectiveness and adequacy of odour reduction works completed by Veolia at the Premises. The IEA should consider the relationship between the odour reduction works completed, any odour sampling commissioned by Veolia, and any odour complaints received or logged by Veolia; and
4. Compliance with the relevant Australian Standards and Condition O5.4 of EPL 20581 in relation to bunding and spill containment systems on the Premises.

In response to the above points, the following information is provided:

1. A number of improvement works were completed at the Terminal which are summarised in Section 3.5.3. These improvement works have been demonstrated to improve the mechanical ventilation system to ensure compliance with condition O7.1 of EPL 20581;
2. This issue has been addressed in Section 3.5.2;
3. As mentioned above, a number of improvement works were completed at the Terminal which are summarised in Section 3.5.3. Since the completion of the improvement works outlined above, there had been a significant reduction in odour complaints from neighbouring businesses or residents. Veolia has proactively been contacting neighbouring groups to obtain feedback on potential off-site odour impacts during previously

problematic weather conditions (south-westerly winds). These communications have confirmed the improved odour performance at the Terminal; and

4. The audit found that the bunding and spill containment systems on the Premises are compliant with the relevant Australian Standards and Condition O5.4 of EPL.

3.8.2. Bayside Council

No comments were received from Bayside Council. Should feedback be received in future, an addendum to the Audit Report will be prepared for Department of Planning and Environment.

3.8.3. NSW Department of Planning and Environment

In an email dated 15 April 2019, Mr Alfarid Hussain, Compliance Officer from Planning Services provided comment on behalf of the Department of Planning and Environment NSW (Department) regarding the environmental performance of the Banksmeadow Transfer Terminal (refer to Attachment E). It was recognised that over the past one year, the Department has not received any community complaints or incident notifications in relation to the project. However, the Department requests that:

1. The auditors determine whether the site's management plans relating to the operational side of the project are being implemented; and
2. The IEA report includes an update as to whether the Veolia is remediating the site in accordance with the site's Remediation Action Plan (RAP), following the penalty notice that was issued to Veolia Environmental Services (Australia) Pty Ltd on 29 March 2017 for failing to remediate the site in accordance with the approved RAP, specifically:
 - Remediation for zinc was not in accordance with the RAP;
 - Site sourced fill was not validated as suitable in service trenching; and
 - Capping of the site to contain asbestos impacted fill.

In response to the above points, the following information is provided:

1. This audit has determined that the facility is being operated in an environmentally sound manner in accordance with the Operational Environmental Management Plan and sub plans as required by the development consent.
2. In a letter dated 28 February 2017 to the Director of Compliance and Investigations at the Department of Planning and Environment, Veolia provided a response pertaining to the Remedial Action Plan prepared for the site. It was determined that during a validation assessment further remediation was required which was reflected in a revised RAP, prepared by a suitably qualified and experienced expert and approved by the site auditor. The amended RAP and subsequent remediation was undertaken at the Premises and addressed those issues raised above. The Site Audit Report issued for the site concluded that remediation had been completed largely in accordance with the RAP, with the deviations acknowledged and deemed acceptable in light of the objectives of the RAP. There was no further remediation work carried out on the site after the penalty notice was issued on 29 March 2017.

3.9. Overview and discussion of environmental performance

Overall, the environmental performance of the facility is good. Veolia operates the facility consistently and in accordance with the Operational Environmental Management Plan and sub plans as required by the development consent. The number of complaints has decreased following improvements to the odour management system at the site. There were no environment incidents during the audit period which demonstrates that the facility is being operated in an environmentally sound manner in accordance with the conditions of consent and Veolia is committed to continuous improvement.

The operation of the facility appeared to be running efficiently and staff members were well trained and experienced, and training records also verified this aspect. During the on-site audit, it was observed that the site was clean and free of litter, there were no signs of waste outside of the processing facility and no excessive noise. The stormwater management system appeared to be in good working order. A slight odour was identified external to the Waste Transfer Building during the on-site audit and this is attributed to the leachate accumulation within the shed, a result of blocked leachate drains. The issue was rectified during the site visit.

3.10. Continuous improvement opportunities

The audit identified a number of areas for improvement as provided in this section.

One of the main areas for improvement is to regularly update the OEMP and subplans. Regular updates of the Operational Environmental Management Plan and sub-plans would allow Veolia to more proactively review changes to the site, changes in legislation as well as any changes to the conditions of consent as a result of the outcome of any development modifications.

Improvements in housekeeping procedures within the processing building are also recommended. Due to the design of the facility, leachate can potentially accumulate if drains are not kept clean and free of debris. Managing leachate will assist Veolia in maintaining low odours from the processing building.

3.11. Recommended Actions

Findings and recommended actions from the Audit are provided in Table 3.4.

Table 3.4. Recommended Actions for the observations/non-compliances from the 2019 Independent Environmental Audit.

Item No.	Reference	Observation / Non-compliance	Recommended Action	Timeframe for Completion/ Implementation	Date Completed
Development Consent SSD5585					
1	Consent Condition 21	Weed management	It is recommended that weed management, in accordance with the Landscape and Vegetation Management Plan, is resumed to avoid the continued growth and potential spread of weed within, and properties adjacent to the site.	Already completed	10 May 2019
2	Schedule 3 – Environmental Performance Conditions – Condition 9 and Condition 10	Observation	Increase the frequency of drain cleaning in the main tipping building and include regular inspections to ensure that the leachate is not accumulating and potentially causing odour which could migrate outside of the processing shed.	2 Months	

4. Conclusions

An Independent Environmental Audit was conducted to assess the environmental performance of Veolia Environmental Services Australia's Banksmeadow Transfer Terminal, located at 34-36 McPherson Street, Banksmeadow for the period between April 2016 and January 2019.

The audit was conducted by Jackson Environment and Planning Pty Ltd in March 2019, as required under Conditions 6 and 7 (Schedule 4) of the Development Consent (SSD5855). The scope of the Audit was limited to the period since previous audit (April 2016) to January 2019 and was conducted in accordance with the Department of Planning and Environment (2018) *Independent Audit – Post Approval Requirements*. The audit included an assessment of compliance with the following development modifications:

- Modification to allow an additional six months to complete road upgrade works to the intersection at Beauchamp Road and Perry Street; and to prevent the emission of offensive odours and leachate leaking from waste containers (SSD5855 Mod 1).

The audit also included an assessment of compliance with management plans in place, and a comparison of predictions in the original Environmental Impact Statement and subsequent modifications to actual performance. The Audit included environmental performance requirements under Environmental Protection Licence (20581) for the same period, as this is specifically required under Schedule 4, Condition 6(c) of SSD5855.

An assessment of the Actions recommended in the 2016 Independent Environmental Audit conducted Ramboll Australia Pty Ltd was carried out during this audit and it was found that all but actions have been completed.

The 2019 audit found no non-compliances, and a small number of observations as follows:

- During the site visit conducted on the 26th March 2019, a small amount of accumulated leachate was identified in the processing building. The design of the building means that leachate drains away from the compactor chutes and across the processing shed towards drains on the eastern side. The drains, fitted with fine grates, direct leachate to the leachate tanks. The odour mitigation program appeared to be fully implemented at the time of the site visit, however, an increase in sweeping of grates in the main tipping building should be considered to prevent any ponding of leachate, which can create odour.
- During the site visit, weeds were identified in the vegetated areas of the site. It is understood that there are performance issues with the current contractor which, at the time of the audit were being rectified. It is recommended that weed management, in accordance with the Landscape and Vegetation Management Plan, is resumed to avoid the continued growth and potential spread of weed within, and properties adjacent to the site.

Overall, the environmental performance of the facility is very good. Veolia operates the facility consistently and in accordance with the Operational Environmental Management Plan and sub plans as required by the development consent. There has been a significant reduction in the number of complaints since the start of the audit period (April 2016) as a result of continual improvements to the facility.

This demonstrates that the facility is being operated in an environmentally sound manner in accordance with the conditions of consent.

5. Independent Audit Certification

Development Name	Banksmeadow Transfer Terminal
Development Consent No.	Development Consent SSD5855
Description of Development	The construction and operation of a waste transfer terminal
Development Address	34-36 McPherson Street, Banksmeadow NSW
Operator	Veolia Environmental Services (Australia) Pty Ltd
Operator Address	Po Box 171 Granville NSW 2142
Independent Audit	
Title of Audit	2019 Independent Environmental Audit – Banksmeadow Transfer Terminal
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines – Independent Audits</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. Immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <p><i>Note.</i></p> <p><i>a) The Independent Audit is an ‘environmental audit’ for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p><i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Signature	
Name of Lead / Principal Auditor	Alan Parsons
Address	1 Power Place, Jindabyne NSW 2627
Email Address	alan.parsons@arprisk.com.au
Auditor Certification	DNV GL Business Assurance
Date	20 May 2019

Appendix A – Development Consent Compliance Table

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
Obligation to Minimise Harm to The Environment				
1	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the development.	The findings from this audit	None	Compliant
Terms of Consent				
2	The Applicant shall carry out the development generally in accordance with the: (a) EIS; (b) RAP; (c) RTS; (d) management and mitigation measures (Appendix A); (e) site layout plans and drawings in the EIS (see Appendix B); and (f) conditions of this Consent.	The findings from this audit	None	Compliant
3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this Consent shall prevail to the extent of any inconsistency.	None	None	Not Triggered
4	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department’s assessment of: (a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this Consent; and (b) the implementation of any actions or measures	None	None	Not Triggered
Limits of Consent				
5	The Applicant shall not receive or process more than: (a) 400,000 tonnes per annum of putrescible material; and (b) 100,000 tonnes per annum of non-putrescible material at the site.	Waste summary reports	None	Compliant
6	The Applicant shall only receive, store, handle or dispose of General Solid Waste or other classes of waste that are authorised for receipt on site by an EPL.	Waste summary reports	None	Compliant
Statutory Requirements				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7	The Applicant shall ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	The findings from this audit	<p>Veolia has obtained the relevant licences, permits and approvals required to undertake the operational activities, including:</p> <ul style="list-style-type: none"> - Environment Protection Licence (EPL 20581). - Approval of the Operational Environmental Management Plan and sub-plans 	Compliant
Structural Adequacy				
8	<p>The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA.</p> <p>Notes: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</p>	None	This condition is not relevant to the current Audit period.	Not Triggered
Demolition				
9	The Applicant shall ensure that all demolition work is carried out in accordance with <i>Australian Standard AS 2601:2001: The Demolition of Structures</i> , or its latest version.	None	This condition is not relevant to the current Audit period.	Not Triggered
Operation of Plant and Equipment				
10	<p>The Applicant shall ensure that all plant and equipment used for the development is:</p> <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	The Auditors observed plant and equipment operated and maintained in a proper and efficient manner as far as could be practically reviewed during the Audit.	None	Compliant
Staged Submission of Plans or Programs				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
11	<p>With the approval of the Secretary, the Applicant may:</p> <ul style="list-style-type: none"> (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or (b) combine any strategy, plan or program required by this consent. 	None	None	Not Triggered
12	<p>Until they are replaced by an equivalent strategy, plan or program approved under this consent, the Applicant shall continue to implement existing strategies, plans or programs for operations on site that have been approved by previous consents or approvals.</p> <p>Notes:</p> <ul style="list-style-type: none"> • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program shall clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages and the trigger for updating the strategy, plan or program; and • There must be a clear relationship between the strategy, plan or program that are to be combined. 	None	None	Not Triggered
13	The Applicant shall submit detailed design plans of the terminal building that are generally in accordance with the plans in the EIS (Appendix B) to the Secretary for approval prior to the issue of a construction certificate.	None	This condition is not relevant to the current Audit period.	Not Triggered
Protection of Public Infrastructure				
14	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. 	None	None	Not Triggered
Dispute Resolution				
15	In the event that a dispute arises between the Applicant and a public authority other than the Department, in relation to a specification or requirement applicable under this approval, the matter shall be referred by either party to the Secretary, or if not resolved, to the Minister, whose determination of the dispute shall be final and binding to all parties. For the purposes of this condition, 'public authority' has the same meaning as provided under Section 4 of the EP&A Act.	None	None	Not Triggered
Development Contribution				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
16	<p>Prior to the commencement of operation of the development, the Applicant shall pay development contributions to the City of Botany Bay Council of \$495,992.00, or an amount otherwise agreed with Council.</p> <p>Note: This contribution is subject to indexation to reflect quarterly variations in the Consumer Price Index All Group Index Number for Sydney, as published by the Australian Bureau of Statistics.</p>	The Auditors sighted an email dated 18th August 2016 from the City of Botany Bay Council (now Bayside Council) acknowledging payment.	None	Compliant
SCHEDULE 3 – ENVIRONMENTAL PERFORMANCE CONDITIONS				
Remediation				
	Remedial Action Plan			
1	The Applicant shall remediate the site in accordance with the approved RAP prior to the commencement of operation. Amendments to the approved RAP required as a result of further site investigations must be prepared by a suitably qualified and experienced expert and approved by the site auditor.	None	This condition is not relevant to the current Audit period.	Not Triggered
2	Prior to the commencement of remediation, the Applicant shall demonstrate to the satisfaction of the Secretary that the RAP has been certified by an accredited site auditor.	None	This condition is not relevant to the current Audit period.	Not Triggered
3	Prior to the commencement of any construction or remediation works, the Proponent shall engage a Site Auditor accredited by the EPA under Part 4 of the <i>Contaminated Land Management Act 1997</i> to provide advice and statutory site audits throughout the remediation project and on completion of the project	None	This condition is not relevant to the current Audit period.	Not Triggered
4	Contaminated material encountered during construction work intended for off-site disposal at an appropriate EPA licensed facility shall be segregated and stored in a dedicated area on site until removal, to the satisfaction of the EPA.	None	This condition is not relevant to the current Audit period.	Not Triggered
	Completion of Work			
5	Upon completion of remediation works, the Applicant shall demonstrate to the satisfaction of the Secretary that the accredited site auditor has prepared a site audit statement and a site audit report which demonstrate that the site is suitable for its intended use(s).	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
6	<p>Within 3 months of the completion of the reinstatement of the site the Applicant shall prepare, in consultation with the EPA, and submit a Site Validation Report, to the satisfaction of the Secretary. The report shall be prepared in accordance with the NSW EPA (1997) Guidelines for Consultants Reporting on Contaminated Sites and include but not be limited to:</p> <ul style="list-style-type: none"> (a) comments on the extent and nature of the remediation undertaken; (b) sampling and analysis plan and sampling methodology; (c) results/interpretation and discussion of results; (d) results of any validation sampling, compared to relevant guidelines; (e) discussion of the suitability the remediated areas for intended land use; 	None	This condition is not relevant to the current Audit period.	Not Triggered
Contamination				
	Groundwater Treatment			
7	<p>The Applicant shall prepare and implement a Groundwater Monitoring and Treatment Program for the project, to be approved by the Secretary and Site Auditor prior to the commencement of construction. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA and NOW; (b) detail baseline data on groundwater levels and quality; (c) include: <ul style="list-style-type: none"> • groundwater treatment criteria; • a program to monitor groundwater levels, flows and quality; • maintenance program for the facility to ensure the on-going effectiveness of the groundwater treatment process; • a protocol for the investigation, notification and mitigation of identified exceedances of the groundwater treatment criteria; • contingency measures to address exceedances and issues with groundwater treatment, including an investigation of alternative remediation treatment options; and • mechanisms to report results to relevant agencies. 	None	This condition is not relevant to the current Audit period.	Not Triggered
	Human Health			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
8	The Proponent shall ensure that all works are carried out in accordance with <i>NSW Work Health and Safety Regulation 2011</i> and the requirements of WorkCover NSW.	This condition is not relevant to the Audit scope however the Auditors observed staff operating in a safe and proper manner as far as could be practically reviewed during the Audit.	None	Not Triggered
Soil, Water and Leachate				
	Stormwater Management			
9	The Applicant shall: <ul style="list-style-type: none"> (a) design and install the stormwater management and collection system in consultation with the City of Botany Bay Council, generally in accordance with the conceptual design in the EIS and applicable Australian Standards and to the satisfaction of the Secretary; (b) ensure that the system capacity has been designed in accordance with the Blue Book Volumes 1 and 2B; (c) divert existing clean surface water around operational areas of the site; (d) direct all sediment laden water in overland flow away from the leachate management system; and (e) prevent cross-contamination of clean and sediment or leachate laden water. 	The Auditors sighted Civil Engineering Report Prepared by: Costin Roe Consulting Pty Ltd dated 1 June 2015 (Rev B).	None	Compliant
	Soil, Water and Leachate Management Plan			

10	<p>The Applicant shall prepare and implement a Soil, Water and Leachate Management Plan for the development in consultation with the City of Botany Bay Council, NOW and the EPA and to the satisfaction of the Secretary. This plan must be prepared and implemented by a suitably qualified and experienced person and be submitted for approval prior to commencement of construction. The plan must include:</p> <ul style="list-style-type: none"> (a) a site water balance that: <ul style="list-style-type: none"> • identifies the source of all water collected or stored on site, including rainfall, stormwater and groundwater; • includes details of all water use on site and any discharges; and • describes the measures that will be implemented to minimise water use on site. (b) an erosion and sediment control plan that: <ul style="list-style-type: none"> • is consistent with the requirements in the latest version of the Blue Book Volume 1 and Volume 2B; • identifies the activities on site that could cause soil erosion and generate sediment; and • describe the measures that will be implemented to: <ul style="list-style-type: none"> ○ minimise soil erosion and the transport of sediment to downstream waters, including the location, function and capacity of any erosion and sediment control structures and maintain these structures over time; ○ ensure that any topsoil stockpiles on site are suitably managed to ensure that the topsoil in these stockpiles can be beneficially used in the proposed revegetation and rehabilitation of the site. (c) a leachate management plan that: <ul style="list-style-type: none"> • includes final detailed design specifications of the leachate management and collection system on site. (d) a stormwater management plan that: <ul style="list-style-type: none"> • is consistent with the guidance in the latest version of the Blue Book Volume 1 and Volume 2B; • includes final detailed design specifications for the stormwater management and collection system; and • demonstrates how the requirements of Condition 9 of this schedule has been addressed. (e) a surface water, groundwater and leachate monitoring program that includes: <ul style="list-style-type: none"> • baseline data; • details of the proposed monitoring network; and • the parameters for testing and respective trigger levels for action 	<p>The Auditors sighted the <i>Soil, Water and Leachate Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.</p>	None	Compliant
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Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	under the surface water, groundwater and leachate response plan (f) a surface water, groundwater and leachate response plan that: <ul style="list-style-type: none"> includes a protocol for the investigation, notification and mitigation of any exceedances of the respective trigger levels; and describes the measures that could be implemented to respond to any surface or groundwater contamination that may be caused by any development. 			
	Water			
11	A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water prior to the commencement of construction.	The Auditors sighted the Section 73 Compliance Certificate dated 19 April 2016	None	Compliant
	Discharge of Water			
12	The development shall comply with Section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	The table contained in Appendix B summarises the audit results against the requirements of the EPL.	None	Compliant
	Groundwater Interception and Extraction			
13	The Applicant shall obtain the necessary water related approvals from NOW in the event that groundwater is likely to be intercepted or extracted during construction.	None	This condition is not relevant to the current Audit period.	Not Triggered
	Acid Sulphate Soils Management Plan			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
14	<p>Prior to the commencement of any site preparation or construction works on the site, the Applicant shall prepare and implement an Acid Sulfate Soils Management Plan for the development to the satisfaction of the Secretary. This Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA and NOW by a suitably qualified and experienced expert; (b) be approved by the Secretary prior to the commencement of any site preparation or construction works; (c) outline the preliminary investigations that have be undertaken to test for the presence of ASS in accordance the NSW State Government's Acid Sulphate Soils Manual (ASSMAC 1998); (d) detail the protocols to be put in place and followed in the event that ASS is encountered; (e) detail how the ASS will be tested, handled and stockpiled; (f) detail measures to prevent erosion and sedimentation of ASS; and, if necessary (g) outline how the ASS will be disposed of off-site (e.g. at a licensed facility). 	None	This condition is not relevant to the current Audit period.	Not Triggered
	Bunding			
15	<p>The Applicant shall store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (Environment Protection Authority, 1997).</p>	<p>The auditors observed a small quantity of chemicals associated with the operation. These chemicals were appropriately stored on banded pallets. chemicals will be stored.</p> <p>A double skinned above ground tank for bulk diesel storage was also observed by the Auditors. The equipment refueling and tanker unloading area had adequate containment / spill controls as observed during the site visit.</p>	None	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Waste				
	Waste Storage and Processing			
16	All uncontainerised waste shall be stored within the building at the premises and all waste processing activities shall be conducted within the building at all times.	Site visit	None	Compliant
17	To prevent unmanageable waste storage, the Applicant shall ensure that: <ul style="list-style-type: none"> (a) the storage of waste within the building shall not exceed more than 1,500 tonnes at any one time; (b) waste stockpiles within the building shall not exceed 4.5m in height; and (c) the container stacking height shall not exceed 3 loaded containers. 	<p>The Auditors sighted the Waste Management Plan (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.</p> <p>Waste stockpiles and container stacking heights were observed during the site visit.</p>	The Operational Contingency Control Measures note the limit on the amount of waste permitted on the premises and includes measures, such as diverting waste to other facilities, in the event that the site cannot process waste and remain under the limit (e.g. due to an interruption to rail services).	Compliant
	Restrictions of the Receipt, Storage, Handling and Disposal of Waste			
18	The development shall ensure that any waste generated on the site during construction is classified in accordance with the EPA's <i>Waste Classification Guidelines</i> and disposed of to a facility that may lawfully accept the waste.	None	This condition is not relevant to the current Audit period.	Not Triggered
	Waste Management			
19	The Applicant shall prepare and implement a Waste Monitoring Program for the development to the satisfaction of Secretary. This program must: <ul style="list-style-type: none"> (a) be prepared in consultation with EPA by a suitably qualified and experienced expert; and (b) include a suitable program to monitor the: <ul style="list-style-type: none"> • quantity, type and source of waste received on site; and • quantity, type and quality of the outputs produced on site. (c) ensure that: <ul style="list-style-type: none"> • all waste that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; and • staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos 	The Auditors sighted the <i>Waste Monitoring Program</i> within the <i>Waste Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.	None	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
20	<p>The Applicant shall prepare and implement a Waste Management Plan for the development, in consultation with the EPA and to the satisfaction of the Secretary. The plan shall:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert; (b) be submitted for approval by the Secretary prior to the commencement of construction; (c) include an asbestos risk assessment for demolition work prior to the removal of any asbestos from the site; (d) include final details of the waste management system implemented at the site; (e) ensure that appropriate waste storage facilities are included in the final design of the waste management system; (f) detail the type and quantity of waste to be generated by the construction and operation of the development; (g) detail the quality of waste to be received on site; (h) detail the materials to be reused or recycled, either on or off site; (i) detail the procedures for handling, storage, collection of recycling and disposal of all waste in accordance with best practice industry standards and guidelines; (j) detail the procedures for the management of waste material, excluding recyclable waste, to ensure: <ul style="list-style-type: none"> • the waste material is regularly removed from the site to an appropriately licensed facility; and • any stockpiles of waste material are stored on sealed areas. (k) if deemed necessary, outline reasonable and feasible measures that may be required to improve waste management at the site and prioritise recommendations for implementation. 	<p>The Auditors sighted the <i>Waste Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.</p>	None	Compliant
	<i>Pest, Vermin & Noxious Weed Management</i>			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
21	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement suitable measures to manage pests, vermin and declared noxious weeds on site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on-site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in surrounding area. <p>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the <i>Noxious Weed Act 1993</i>.</p>	<p>The Auditors sighted Landscape and Vegetation Management Plan (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.</p> <p>Pests and vermin were not observed during the site visit.</p>	<p>The Auditors observed weeds during the site visit. It is understood that the current contractor for weed management is under review (due to performance issues). Weed management is currently undertaken quarterly with the last inspection undertaken on 22nd February 2019.</p>	Compliant
Traffic and Access				
	<i>Access and Road Upgrade Work</i>			
22	Prior to the commencement of operations, the Applicant must obtain approval for rail access from the Australian Rail Track Corporation.	None	This condition is not relevant to the current Audit period.	Not Triggered
23	Within six months of the commencement of limited operations in accordance Condition 234 the Applicant must complete the road upgrade works at the intersection of Beauchamp Road and Perry Street and the left turn deceleration lane into the site, in consultation with City of Botany Bay Council and Randwick City Council, and to the satisfaction of RMS and the Secretary.	None	This condition is not relevant to the current Audit period.	Not Triggered
23A	The Applicant may commence operations prior to the completion of the road upgrade works referred to in Condition 23 above provided the Applicant does not receive or process more than 18,000 tonnes per month in the period prior to the completion of the road works upgrades.	None	This condition is not relevant to the current Audit period.	Not Triggered
23B	During the reduced operation phase specified in condition 23A above, records of hourly truck numbers and their capacity shall be kept and provided to the City of Botany Bay Council when requested.	None	This condition is not relevant to the current Audit period.	Not Triggered
24	Detail design plans for the intersection works referred to in condition 23 above, including Traffic Control Signal plans, must be prepared by a suitably qualified person in consultation with City of Botany Bay Council and Randwick City Council and submitted to the RMS for review and endorsement prior to the commencement of construction of the road upgrade works. The Applicant will be required to enter into a Works Authorisation Deed (WAD) with RMS for the works. The WAD will need to be executed prior to the RMS's assessment of the detailed design plans.	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
25	The Applicant must be responsible for all public utility adjustment/relocation works, necessitated by the above work and as required by the various public utility authorities and/or their agents	None	This condition is not relevant to the current Audit period.	Not Triggered
26	All works/regulatory signposting associated with the development are to be at no cost to the RMS.	None	This condition is not relevant to the current Audit period.	Not Triggered
Traffic Monitoring				
27	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) keep accurate records of the volume of waste transported to the site; (b) nominate a haulage route to be used by heavy vehicles accessing the site; and (c) make these records available in its Annual Review 	<p>The Auditors sighted the Traffic Management Plan (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.</p> <p>The Auditors sighted the following documents:</p> <ul style="list-style-type: none"> • 2016 Annual Environment Management Report – BTT AEMR 2015-2016 (dated 28 June 2016). • 2017 Annual Environment Management Report – BTTAEMR2017 (dated 30 June 2017). • 2018 Annual Environment Management Report – BTTAEMR2018 (dated 28 June 2018) 	None	Compliant
Operating Conditions				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
28	<p>The Applicant shall ensure that:</p> <ul style="list-style-type: none"> (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2; (b) the swept path of the longest vehicle entering and exiting the subject site, as well as maneuverability through the site, is in accordance with AUSTRROADS Guide to Road Design; (c) the development does not result in any vehicles queuing on the public road network; (d) a right turn restriction into the site from Beauchamp Road shall be implemented between 6am – 8pm; (e) heavy vehicles do not use Perry Street to travel to/from the site; (f) heavy vehicles and bins associated with the development do not park or stand on local roads or footpaths in the vicinity of the site; (g) all vehicles are wholly contained on site before being required to stop; (h) all loading and unloading of materials is carried out on site; (i) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; (j) all trucks entering or leaving the site with loads have their loads covered; and (k) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads. 	Site visit	None	Compliant
	Waste Transportation			
28A	The Applicant shall ensure that all waste containers are designed, constructed and maintained to prevent the emission of offensive odour and be water-tight to prevent the leakage of leachate during transport and handling activities.	Site visit	None	Compliant
	Traffic Management Plan			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
29	<p>The Applicant shall prepare and implement a Traffic Management Plan for the development, to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert in consultation with RMS, City of Botany Bay Council and Randwick City Council; (b) be approved by the Secretary prior to the commencement of construction; (c) include construction traffic management measures detailing: <ul style="list-style-type: none"> • access and parking arrangements for the site during construction; • measures to ensure that the local road network is not utilised by vehicles during construction; • measures to control traffic movements from site during construction; • procedures for notifying residents of construction traffic routes and potential disruptions to routes and access; and • the impact of the development on the road network, where temporary road closures are required during construction. (d) include a plan showing the designated haulage route/s to be used by heavy vehicles during operation; (e) include a driver’s code of conduct; (f) describe the measures that will be implemented to ensure: <ul style="list-style-type: none"> • the nominated haulage routes are used; • drivers adhere to the right turn restriction into the site from Beauchamp • Road between 6am-10am and 3pm-7pm, as required by Condition 28(d); • conflicts with other road users are minimised; • drivers adhere to the code of conduct including; • road noise impacts are minimised through measures such as limiting truck • compression braking; and • compliance with the relevant conditions of this consent. (g) <u>include</u> a program to monitor the effectiveness of these measures. 	<p>The Auditors sighted the <i>Traffic Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.</p>	<p>None</p>	<p>Compliant</p>
Hazard and Risk				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
30	<p>At least one month prior to the commencement of construction of the proposed development (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Secretary may agree, the Applicant shall prepare and submit a Fire Safety Study and a Hazard and Operability Study to the Secretary.</p> <p>(a) <u>Fire Safety Study</u> A Fire Safety Study for the proposed development. This study shall cover the relevant aspects of the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 2, ‘Fire Safety Study Guidelines’ and the New South Wales Government’s ‘Best Practice Guidelines for Contaminated Water Retention and Treatment Systems’. The study shall be prepared in consultation with Fire and Rescue NSW and submitted to the Secretary.</p> <p>(b) <u>Hazard and Operability Study</u> A Hazard and Operability Study for the proposed development, chaired by a qualified person, independent of the development, whose appointment has been endorsed by the Secretary prior to the commencement of the study. The study shall be consistent with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 8, ‘HAZOP Guidelines’. The study report must be accompanied by a program for the implementation of all recommendations made in the report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.</p>	None	This condition is not relevant to the current Audit period.	Not Triggered
31	<p>Dangerous Goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with:</p> <p>(a) all relevant Australian Standards;</p> <p>(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>(c) the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin</i> (Environment Protection Authority, 1997).</p> <p>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>	Site visit	None	Compliant
	Emergency Response			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
32	The Applicant shall maintain and implement an emergency response plan for the site. The emergency response plan shall: <ul style="list-style-type: none"> (a) be submitted to the Secretary prior to the commencement of operation; (b) be kept on-site at all times; (c) include a risk assessment of likely incidents that could occur on-site (e.g. spills, explosion, fire) based on the activities being undertaken, site risks and consequence to the receiving environment; and (d) document the systems and procedures to deal with the types of incidents identified including relevant incident notification procedures. 	The Auditors sighted the Site Emergency Response Plan - Banksmeadow Transfer Terminal (Document Code: MAN-5174-1) dated 7 th August 2018	None	Compliant
Air Quality				
	Odour			
33	The Applicant shall ensure the development does not cause or permit the emission of any offensive odour (as defined by the POEO Act).	Complaints summary Site visit	Refer to Section 3.5 of body of report	Compliant
	Odour Management Plan			
34	The Applicant shall prepare and implement an Odour Management Plan to the satisfaction of the Secretary. This plan must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert in consultation with the EPA and City of Botany Bay Council; (b) be approved by the Secretary prior to the commencement of operations; (c) describe the measures that would be implemented on site to minimise the odour impacts of the development; (d) identify triggers for contingency action; and (e) include a program for monitoring the odour impacts of the development. 	The Auditors sighted the <i>Air Quality Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016	None	Compliant
	Dust Management			
35	The premises shall be maintained in a condition which minimises or prevents the emission of dust from the premises	Site visit	None	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
36	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement best management practice, including all reasonable and feasible dust and odour mitigation measures to prevent and minimise dust emissions from operations; (b) prevent and minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events; (c) regularly assess air quality monitoring data and relocate, modify, and/or stop operations to ensure compliance with the relevant conditions of this consent; (d) minimise any visible off-site air pollution; and (e) minimise surface disturbance of the site, other than as permitted under this consent. 	<p>The Auditors sighted the Air Quality Management Plan (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016</p>	<p>None</p>	<p>Compliant</p>
37	<p>During construction, the Applicant shall ensure that:</p> <ul style="list-style-type: none"> (a) all vehicles on site do not exceed a speed limit of 30 kilometres per hour; (b) all loaded vehicles entering or leaving the site have their loads covered; and (c) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads. 	<p>None</p>	<p>This condition is not relevant to the current Audit period.</p>	<p>Not Triggered</p>
<i>Air Quality Management Plan</i>				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
38	<p>The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert in consultation with the EPA, (b) be approved by the Secretary prior to the commencement of construction; (c) describe the measures that would be implemented to: <ul style="list-style-type: none"> • minimise the fugitive emissions from excavating, handling and treating contamination hot spots including details on methods for dealing with soil contamination variability; • include well-defined triggers for additional air quality measures for excessive fugitive emissions including stop-work during adverse weather; • ensure all reasonable and feasible dust and odour mitigation measures are employed to prevent and minimise dust and odour emissions from construction and operation of the development; • ensure compliance with the relevant conditions of this consent and the EPL; and • prevent and minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events; (d) include a cleaning protocol which: <ul style="list-style-type: none"> • details the procedures to be undertaken to routinely manage, maintain and clean the internal surfaces of the premises to ensure operating conditions inside the facility minimise the potential to generate odour, dust and the carriage of waste outside the facility; and • describes how all external surfaces would be routinely managed and maintained so as to be kept free of dust, waste material and other contaminants; and (e) include a protocol for determining any exceedances of the relevant conditions of approval and criteria in the EPL and responding to complaints. 	<p>The Auditors sighted the <i>Air Quality Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016</p>	<p>None</p>	<p>Compliant</p>
Noise				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal																	
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status													
39	<p>The Applicant shall comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Secretary.</p> <table border="1"> <caption>Table 1: Operating Hours</caption> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday - Friday</td> <td>7:00am – 6:00pm</td> </tr> <tr> <td>Saturday</td> <td>8:00am – 1:00pm</td> </tr> <tr> <td>Sunday & Public Holidays</td> <td>Nil</td> </tr> <tr> <td>Operations</td> <td colspan="2">24 hours</td> </tr> </tbody> </table>	Activity	Day	Hours	Construction	Monday - Friday	7:00am – 6:00pm	Saturday	8:00am – 1:00pm	Sunday & Public Holidays	Nil	Operations	24 hours		None	None	Compliant
Activity	Day	Hours															
Construction	Monday - Friday	7:00am – 6:00pm															
	Saturday	8:00am – 1:00pm															
	Sunday & Public Holidays	Nil															
Operations	24 hours																
	Operating Conditions																
40	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement best management practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development; (b) minimise the noise impacts of the development during adverse meteorological conditions when noise criteria do not apply; (c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and (d) regularly assess noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent 	<p>Site visit</p> <p>The Auditors also sighted the <i>Noise and Vibration Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.</p>	None	Compliant													
	Noise and Vibration Management Plan																

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
41	<p>The Applicant shall prepare and implement a Noise and Vibration Management Plan for the development in consultation with the EPA and to the satisfaction of the Secretary. The plan must:</p> <ul style="list-style-type: none"> (a) be prepared and implemented by a suitably qualified and experienced person in consultation with the City of Botany Bay Council, Randwick City Council and the EPA; (b) be approved by the Secretary prior to the commencement of construction; (c) describe the measures that will be implemented to ensure: <ul style="list-style-type: none"> • best management practice is being employed on site; and • the noise and vibration impacts of the development are minimised during any meteorological conditions; and • compliance with the relevant conditions of this consent. (d) describe the noise management system; (e) include a noise and vibration monitoring program that: <ul style="list-style-type: none"> • is capable of evaluating the performance of the development; • includes a protocol for determining compliance with the predictions in the EIS and RTS; • adequately supports the noise management system; and • evaluates and reports on the effectiveness of the noise management system; and (f) include details of short term vibration trials of construction equipment that are conducted in consultation with the surrounding landowners. 	<p>The Auditors sighted the <i>Noise and Vibration Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016</p>	None	Compliant
Energy Efficiency				
42	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement all reasonable and feasible measures to minimise energy use and greenhouse gas emissions during construction and operation; and (b) ensure the development will continue to operate at industry best practice over time. 	None	None	Compliant
Visual Amenity				
	Lighting			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
43	<p>The Applicant shall ensure that the lighting associated with the development:</p> <ul style="list-style-type: none"> (a) complies with the latest version of AS 4282(INT) - <i>Control of Obtrusive Effects of Outdoor Lighting</i>; and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. 	Complaints Summary	<p>Assumed to be compliant based on issuing of the Occupation Certificate.</p> <p>The Site visit was conducted during the day, therefore could not be assessed, however, the Auditors have no reason to believe the condition has not been complied with</p> <p>No complaints have been received regarding lighting at the Site.</p>	Compliant
Signage				
44	<p>The Applicant shall install all signs in consultation with City of Botany Bay Council.</p> <p>Note: This condition does not apply to any signage identified as exempt or complying development in <i>State Environmental Planning Policy (Exempt and Complying Development Codes) 2008</i></p>	None	This condition is not relevant to the current Audit period.	Not Triggered
Landscaping and Vegetation Management				
45	<p>The Applicant shall prepare and implement a Landscaping and Vegetation Management Plan for the development in consultation with City of Botany Council and to the satisfaction of the Secretary. The plan shall:</p> <ul style="list-style-type: none"> (a) be approved by the Secretary prior to the commencement of construction; (b) detail any trees that are proposed to be removed, ringbarked, cut, topped or lopped; (c) detail any revegetation works at the site, with particular attention to minimizing the visibility of the site from residences and public vantage points, minimizing bushfire risk and the use of indigenous species; (d) ensure that any clearing or trimming of vegetation on the western side of McPherson Street, at the intersection with Beauchamp Road, is undertaken in consultation with City of Botany Bay Council; and (e) describe the on-going measures (e.g. weed control and regular pruning) that would be implemented to maintain landscaping and vegetation on the site for the life of the development. 	The Auditors sighted the <i>Landscaping and Vegetation Management Plan</i> (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016	None	Compliant

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Aviation Safety				
46	At least 35 days prior to the commencement of construction of the project, the Applicant must obtain all necessary approvals from the Sydney Airports Corporation for the erection of any temporary structure or construction equipment.	None	This condition is not relevant to the current Audit period.	Not Triggered
Heritage				
47	The development shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered onsite. The NSW Police, the Aboriginal Community and the OEH are to be notified. Works shall not resume in the designated area until approval in writing from the NSW Police and/or the OEH has been obtained.	Audit interview	None	Not Triggered
Security				
48	The Applicant shall ensure that: (a) the site is secured by a perimeter fence and security gates; and (b) the security gates on site are patrolled at all times.	Site visit and audit interview	None	Compliant
SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
Environmental Management				
	<i>Construction Environmental Management Plan</i>			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
1	<p>The Applicant shall prepare and implement a Construction Environmental Management Plan for the development to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> (a) be submitted to the Secretary for approval no later than two weeks prior to the commencement of construction or demolition or within such period otherwise agreed by the Secretary; (b) identify the statutory approvals that apply to the development; (c) consolidate all relevant management plans and monitoring programs required in the conditions of this Consent; (d) outline all environmental management practices and procedures to be followed during construction and demolition works associated with the development; (e) describe all activities to be undertaken on the site during construction of the development, including a clear indication of construction stages; (f) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts; (g) describe the roles and responsibilities for all relevant employees involved in construction and demolition works associated with the development; (h) include arrangements for community consultation and complaints handling procedures during construction and demolition; and (i) include copies of the various strategies and plans that are required under the conditions of this Consent once they have been approved. <p>Note:</p> <ol style="list-style-type: none"> 1. Construction of the Development shall not commence until written approval of this plan has been received from the Secretary. 2. The City of Botany Bay Council shall be provided with a copy of the approved Construction Environmental Management Plan within 7 days of the date of its approval. 	None	This condition is not relevant to the current Audit period.	Not Triggered
	Operational Environmental Management Plan			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
2	<p>The Applicant shall prepare and implement an Operational Environmental Management Plan to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be submitted to the Secretary for approval prior to commencement of operations; (b) be prepared by a suitably qualified and experienced expert; (c) provide the strategic framework for environmental management of the development; (d) identify the statutory requirements that apply to the development; (e) consolidate all relevant environmental management plans and monitoring programs required in the conditions of this consent and committed to in the EIS; (f) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the development. (g) describe in general how the environmental performance of the development would be monitored and managed; and (h) describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the development; • respond to any non-compliances; and • respond to emergencies. 	<p>The Auditors sighted the Operational Environmental Management Plan (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016</p>	<p>None</p>	<p>Compliant</p>
	Management Plan Requirements			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
3	<p>The Applicant shall ensure that the Management Plans required under this consent are prepared in accordance with any relevant guidelines, and include:</p> <ul style="list-style-type: none"> (a) detailed baseline data; (b) a description of: <ul style="list-style-type: none"> • the relevant statutory requirements (including any relevant approval, licence or lease conditions); • any relevant limits or performance measures/criteria; and • the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; (c) a description of the measures that will be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: <ul style="list-style-type: none"> • impacts and environmental performance of the development; and • effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: <ul style="list-style-type: none"> • incidents; • complaints; • non-compliances with statutory requirements; and • exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan. <p>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	<p>The Auditors sighted the Operational Environmental Management Plan (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016 and relevant sub-plans</p>	<p>None</p>	<p>Compliant</p>
Reporting				
	Incident Reporting			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
4	The Applicant shall notify the Secretary, City of Botany Bay Council and any other relevant agencies of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of this incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident.	Audit interview	None	Not Triggered
	Regular Reporting			
5	The Applicant shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.	<p>The Auditors sighted the following documents on the Veolia website:</p> <ul style="list-style-type: none"> • 2016 Annual Environment Management Report – BTT AEMR 2015-2016 (dated 28 June 2016). • 2017 Annual Environment Management Report – BTTAEMR2017 (dated 30 June 2017). • 2018 Annual Environment Management Report – BTTAEMR2018 (dated 28 June 2018) 	None	Compliant

Independent Environmental Audit

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
6	<p>Within one (1) year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <ul style="list-style-type: none"> (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals); (d) review the adequacy of any approved strategy, plan or program required under these approvals; and (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals. <p>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</p>	<p>The Auditors sighted the 2016 Independent Environmental Audit conducted by Ramboll Australia Pty Ltd (report dated 28 July 2016).</p> <p>This audit satisfies the first audit required 3 years after the first audit.</p>	None	Compliant
7	<p>Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>	This audit report	None	Compliant
	Annual Review			

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
8	<p>Within one (1) year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the development to the satisfaction of the Secretary. This review must:</p> <ul style="list-style-type: none"> (a) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year; (b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against: <ul style="list-style-type: none"> • the relevant statutory requirements, limits or performance measures/criteria; • the monitoring results of previous years; and • the relevant predictions in the EIS; (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the development; (e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the current calendar year to improve the environmental performance of the development. 	<p>The Auditors sighted the following documents:</p> <ul style="list-style-type: none"> • 2016 Annual Environment Management Report – BTT AEMR 2015-2016 (dated 28 June 2016). • 2017 Annual Environment Management Report – BTTAEMR2017 (dated 30 June 2017). • 2018 Annual Environment Management Report – BTTAEMR2018 (dated 28 June 2018) 	None	Compliant
	Revision of Strategies, Plans & Programs			
9	<p>Within 3 months of the submission of an:</p> <ul style="list-style-type: none"> (a) annual review under Condition D8 of this schedule; (b) incident report under Condition D4 of this schedule; (c) audit report under Condition D6 of this schedule; and (d) any modifications to this consent, <p>the Applicant shall review, and if necessary, revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</p>	None	None	Not Triggered
Access to Information				

Conditions of Development Consent – SSD 5855 (incorporating MOD 1) - Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
10	<p>The Applicant shall:</p> <p>(a) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> • the EIS; • current statutory approvals for the development; • approved strategies, environmental management plans or programs; • a summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; • a complaints register, updated on a quarterly basis; • copies of any annual reviews (over the last 5 years); • any independent environmental audit, and the Applicant’s response to the recommendations in any audit; and • any other matter required by the Secretary; and <p>(b) keep this information up-to-date, to the satisfaction of the Secretary.</p>	The Auditors sighted the required documents on the Veolia website	None	Compliant

Appendix B – Environment Protection Licence Compliance Table

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal													
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status									
1 – ADMINISTRATIVE CONDITIONS													
A1	<i>What the licence authorises and regulates</i>												
A1.1	This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2: Construction of the Veolia Banksmeadow Waste Transfer Terminal	None	This audit was carried out during the operational phase following completion of construction works	Compliant									
A1.2	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. <table border="1" data-bbox="280 790 1137 917"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Waste processing (non-thermal treatment)</td> <td>Non-thermal treatment of general waste</td> <td>Any annual processing capacity</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - other types of waste</td> <td>Any other types of waste stored</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity	Waste storage	Waste storage - other types of waste	Any other types of waste stored	Site visit	None	Compliant
Scheduled Activity	Fee Based Activity	Scale											
Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity											
Waste storage	Waste storage - other types of waste	Any other types of waste stored											
A2	<i>Premises or plant to which this licence applies</i>												
A2.1	The licence applies to the following premises: <i>BANKSMEADOW TRANSFER TERMINAL</i> <i>34-36 MCPHERSON STREET</i> <i>BANKSMEADOW</i> <i>NSW 2019</i> <i>LOTS A & B DP.366725, LOT 1 DP.435497, AND PART LOT 2 DP.1006865</i>	Site visit	None	Compliant									
A3	<i>Information supplied to the EPA</i>												

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal																
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status												
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>(a) the applications for any licences (including former pollution control approvals) which this licence replaces under the <i>Protection of the Environment Operations (Savings and Transitional) Regulation 1998</i>; and</p> <p>(b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Site visit	None	Compliant												
2 – DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND																
P1	Location of monitoring/discharge points and areas															
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1" data-bbox="273 810 1137 944"> <thead> <tr> <th colspan="4">Water and land</th> </tr> <tr> <th>EPA Identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water quality monitoring point</td> <td></td> <td>Adjacent to site entry point on MacPherson Road Banksmeadow.</td> </tr> </tbody> </table>	Water and land				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Water quality monitoring point		Adjacent to site entry point on MacPherson Road Banksmeadow.	None	Water quality sampling point is identified; however, condition M2.2 specifies required action	Compliant
Water and land																
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description													
1	Water quality monitoring point		Adjacent to site entry point on MacPherson Road Banksmeadow.													
3 – LIMIT CONDITIONS																
L1	Pollution of waters															
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	The findings of this audit	None	Compliant												
L2	Concentration Limits															
L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Water quality sampling summary sheet. Audit interview	Refer to Section 3.5.3 of the body of this report	Compliant												
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.															

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal																																								
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																																				
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.	Water quality sampling summary sheet. Audit interview	None	Compliant																																				
L2.4	<p>Water and/or Land Concentration Limits</p> <p>POINT 1</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of Measure</th> <th>50 Percentile concentration limit</th> <th>90 Percentile concentration limit</th> <th>3DGM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>10</td> </tr> <tr> <td>Nitrogen (ammonia)</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>1</td> </tr> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>10</td> </tr> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td></td> <td>6 - 8.5</td> </tr> <tr> <td>TSS</td> <td>milligrams per litre</td> <td></td> <td></td> <td></td> <td>50</td> </tr> </tbody> </table>	Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	BOD	milligrams per litre				10	Nitrogen (ammonia)	milligrams per litre				1	Oil and Grease	milligrams per litre				10	pH	pH				6 - 8.5	TSS	milligrams per litre				50	None	Water quality sampling point is identified; however, condition M2.2 specifies required action	Not Triggered
Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																																			
BOD	milligrams per litre				10																																			
Nitrogen (ammonia)	milligrams per litre				1																																			
Oil and Grease	milligrams per litre				10																																			
pH	pH				6 - 8.5																																			
TSS	milligrams per litre				50																																			
L3	Waste																																							
L3.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td></td> <td></td> <td>100,000t per annum</td> </tr> <tr> <td>NA</td> <td>General solid waste (putrescible)</td> <td></td> <td></td> <td>400,000t per annum</td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General solid waste (non-putrescible)			100,000t per annum	NA	General solid waste (putrescible)			400,000t per annum	The Auditors sighted the Waste Summary Report	None	Compliant																					
Code	Waste	Description	Activity	Other Limits																																				
NA	General solid waste (non-putrescible)			100,000t per annum																																				
NA	General solid waste (putrescible)			400,000t per annum																																				

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L3.2	The authorised amount of waste permitted on the premises cannot exceed 6,225 tonnes at any one time.	Site visit and audit interviews	None	Compliant
L4	Potentially offensive odour			
L4.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the <i>Protection of the Environment Operations Act 1997</i> . Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	Site visit and complaints record	Refer to Section 3.5.3.	Non-compliant
4 – OPERATING CONDITIONS				
O1	Activities must be carried out in a competent manner			
O1.1	Licensed activities must be carried out in a competent manner. This includes: (a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	The Auditors observed waste handling activities being undertaken in a proper manner as far as could be practically reviewed during the Audit.	None	Compliant
O2	Maintenance of plant and equipment			
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: (a) must be maintained in a proper and efficient condition; and (b) must be operated in a proper and efficient manner.	The Auditors observed plant and equipment installed, operated and maintained in a proper and efficient manner as far as could be practically reviewed during the Audit.	None	Compliant
O3	Dust			
O3.1	A dust suppression system must be operated and maintained within the transfer building to effectively suppress all dust emissions.	The Auditors did not observe dust being created within the transfer building as far as could be practically reviewed during the Audit.	None	Compliant

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O3.2	All operations and activities occurring at the premises must be carried out in a manner that will prevent the emission of dust from the premise.	The Auditors observed waste handling activities being undertaken in a proper manner so as to not create dust as far as could be practically reviewed during the Audit.	None	Compliant
O4	Emergency Response			
O4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.	The Auditors sighted the Site Emergency Response Plan - Banksmeadow Transfer Terminal (Document Code: MAN-5174-1) dated 7th August 2018	None	Compliant
O4.2	The licensee must have adequate fire prevention measures in place and ensure that facility personnel are able to access fire-fighting equipment and manage fire outbreaks at any part of the premises.	The Auditors sighted the Fire Safety Statement dated 16 th November 2018 (assessment date 2 nd October 2018).	None	Compliant
O5	Processes and management			
O5.1	(non-putrescible) received for storage or recovery or processing at the premises is assessed and classified in accordance with the EPA Waste Classification Guidelines as in force from time to time.	The Auditors sighted the Waste Management Plan (Document Code: PLA-NSW-XXX-XXX-1) dated 23 June 2016.	Waste is managed appropriately in accordance with the Waste Management Plan	Compliant
O5.2	The licensee must ensure that each waste for recovery/recycling is stockpiled separately	Site visit and audit interview	The auditors observed waste being received and separated into separate bays according to waste type	Compliant
O5.3	No maintenance or cleaning of waste vehicles or waste containers shall be conducted at the Premises	Site visit	None	Compliant

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O5.4	All servicing, maintenance and re-fueling activities must be conducted in a covered area that excludes all stormwater, is constructed of sealed hardstand and to contain all spills within. This condition commences and continues to be in effect from 14 November 2016	Site visit	None	Compliant
O6	Waste Management			
O6.1	All waste processing activities shall be conducted within the transfer building	Site visit	None	Compliant
O6.2	No waste shall be stored outside the transfer building except when containerised for the purpose of transport to the Woodlawn Eco-Project Site	Site visit	None	Compliant
O6.3	Waste shall be processed on a first in, first out basis.	Site visit and audit interview	None	Compliant
O6.4	Vehicles leaving the waste processing areas must not track materials outside the transfer building	Site visit	None	Compliant
O6.5	All areas that involve the handling of waste including container transfer and handling areas, clean container storage areas and internal roadways must be sealed	Site visit	None	Compliant
O6.6	All waste containers shall be maintained so as to contain all waste, liquid and odour	Site visit	None	Compliant
O6.7	Stormwater from all external areas used for waste activities must drain via the stormwater monitoring point. This condition commences and continues to be in effect from 14 November 2016	Site visit and stormwater drainage designs	None	Compliant
O6.8	The Licensee must operate a stormwater isolation valve that: <ol style="list-style-type: none"> 1. Is located prior to the point of stormwater egress from the Premises; 2. Discharges via the stormwater monitoring point; 3. Is closed whenever a spill occurs at the Premises on surfaces that drain stormwater; and 4. Is installed and maintained to be effective from 14 November 2016. 	Site visit and audit interview	None	Compliant
O7	Other operating conditions			
O7.1	The mechanical ventilation system must be operated and maintained to ensure the putrescible waste and compactor areas are maintained under negative pressure and can only discharge to atmosphere via the stack.	Site visit and audit interview	None	Compliant
5 – Monitoring and Recording Conditions				
M1	Monitoring records			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	The Auditors sighted environmental monitoring summary	None	Compliant

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal																												
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																								
M1.2	All records required to be kept by this licence must be: (a) in a legible form, or in a form that can readily be reduced to a legible form; (b) kept for at least 4 years after the monitoring or event to which they relate took place; and (c) produced in a legible form to any authorised officer of the EPA who asks to see them.	The Auditors sighted various record from the commencement of the operations however, this has been for less than 4 years.	None	Compliant																								
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: (a) the date(s) on which the sample was taken; (b) the time(s) at which the sample was collected; (c) the point at which the sample was taken; and (d) the name of the person who collected the sample.	The Auditors sighted environmental monitoring summary	None	Compliant																								
M2	Requirement to monitor concentration of pollutants discharged																											
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	The Auditors sighted environmental monitoring summary	None	Compliant																								
M2.2	Water and/ or Land Monitoring Requirements	None	None	Not Triggered																								
	<table border="1"> <thead> <tr> <th colspan="4">POINT 1</th> </tr> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> <tr> <td>Nitrogen (ammonia)</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> <tr> <td>Oil and Grease</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> <tr> <td>pH</td> <td>pH</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> <tr> <td>TSS</td> <td>milligrams per litre</td> <td>Daily during any discharge</td> <td>Other Approved Method 1</td> </tr> </tbody> </table>				POINT 1				Pollutant	Units of measure	Frequency	Sampling Method	BOD	milligrams per litre	Daily during any discharge	Other Approved Method 1	Nitrogen (ammonia)	milligrams per litre	Daily during any discharge	Other Approved Method 1	Oil and Grease	milligrams per litre	Daily during any discharge	Other Approved Method 1	pH	pH	Daily during any discharge	Other Approved Method 1
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pH	pH	Daily during any discharge	Other Approved Method 1																									
TSS	milligrams per litre	Daily during any discharge	Other Approved Method 1																									
M3	Testing methods - concentration limits																											
M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted	None	None	Compliant																								
M4	Recording of pollution complaints																											

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M4.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	The auditors sighted the Complaints Register	None	Compliant
M4.2	The record must include details of the following: (a) the date and time of the complaint; (b) the method by which the complaint was made; (c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (d) the nature of the complaint; (e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and (f) if no action was taken by the licensee, the reasons why no action was taken.	The auditors sighted the Complaints Summary	None	Compliant
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	The auditors sighted the Complaints Summary commenced in December 2016 which is currently 2 years for the operation of the facility	None	Compliant
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	None	None	Not Triggered
M4	Telephone complaints line			
M5.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Site visit	None	Compliant
M5.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Site visit	None	Compliant
M5.3	The preceding two conditions do not apply until 2 July 2015 the date of the issue of this licence.	None	None	Compliant
6 – REPORTING CONDITIONS				
R1	Annual return documents			

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	Annual Return documentation	The Auditors sighted the Annual Return documentation	Compliant
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p>	Annual Return documentation	The Auditors sighted the Annual Return documentation	Compliant
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ol style="list-style-type: none"> (g) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and (h) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <p>Note: An application to transfer a licence must be made in the approved form for this purpose</p>	None	None	Not Triggered
R1.4	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <ol style="list-style-type: none"> (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or (b) in relation to the revocation of the licence - the date from which notice revoking the licence operates. 	None	None	Not Triggered

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Annual Return documentation	The Auditors sighted the Annual Return documentation	Compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Annual Return documentation	The Auditors sighted the Annual Return documentation	Compliant
R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Annual Return documentation	The Auditors sighted the Annual Return documentation	Compliant
R2	Notification of environmental harm			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	None	None	Not Triggered
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	None	None	Not Triggered
R3	Written report			
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: (a) where this licence applies to premises, an event has occurred at the premises; or (b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event	None	None	Not Triggered
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	None	None	Not Triggered

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R3.3	The request may require a report which includes any or all of the following information: (a) the cause, time and duration of the event; (b) the type, volume and concentration of every pollutant discharged as a result of the event; (c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; (d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; (e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; (f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and (g) any other relevant matters	None	None	Not Triggered
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	None	None	Not Triggered
7 – GENERAL CONDITIONS				
G1	<i>Copy of licence kept at the premises or plant</i>			
G1.1	A copy of this licence must be kept at the premises to which the licence applies	Site visit	The licence is available electronically at the site.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Site visit	The licence is available electronically at the site	Not Triggered
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site visit	The licence is available electronically at the site	Compliant
8 – SPECIAL CONDITIONS				
E1	<i>Financial assurance</i>			

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E1.1	<p>(a) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA prior to issuing this licence. The financial assurance must be in favour of the EPA in the amount of one hundred thousand dollars (\$100,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p> <p>(b) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by 30 June 2017. The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of two hundred thousand dollars (\$200,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. Note that this total financial assurance is inclusive of that required in E1.1a).</p> <p>(c) The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by the Australian Prudential Regulatory Authority (APRA).</p>	The previous Audit sighted the evidence of payment of financial assurance	None	Compliant
E1.2	The financial assurance must be maintained during the operation of the premises and thereafter until such time as the EPA is satisfied the premises are environmentally secure.	None	None	Not Triggered
E1.3	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	None	None	Not Triggered
E1.4	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	None	None	Not Triggered

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E1.5	The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: (a) the financial assurance required by condition E1.1; or (b) the adjusted financial assurance as required by condition E1.3 and E1.4.	None	None	Not Triggered
E2	<i>Environment Obligations of Licensee (Works and Programs)</i>			
E2.1	While the licensee’s premises are being used for the purpose to which the licence relates, the licensee must: (a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee’s employees or agents. (b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. (c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.	Site audit	A minor spill was observed during the site visit which was in the process of being cleaned-up	Compliant
E2.2	In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must: (a) Make all efforts to contain all firewater on the licensee’s premises; (b) Make all efforts to control air pollution from the licensee’s premises; (c) Make all efforts to contain any discharge, spill or run-off from the licensee’s premises; (d) Make all efforts to prevent flood water entering the licensee’s premises; (e) Remediate and rehabilitate any exposed areas of soil and/or waste; (f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of; (g) At the request of the EPA monitor groundwater beneath the licensee’s premises and its potential to migrate from the licensee’s premises; (h) At the request of the EPA monitor surface water leaving the licensee’s premises; and (i) Ensure the licensee’s premises is secure.	None	None	Not Triggered

Conditions of EPL 20581 Banksmeadow Waste Transfer Terminal				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E2.3	<p>After the licensee’s premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:</p> <p>(a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee’s premises;</p> <p>(b) rehabilitate the site, including assessment and if required remediation of any site contamination.</p>	None	None	Not Triggered
E3	<i>EPA May Claim on a Financial Assurance</i>			
E3.1	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	None	None	Not Triggered

Appendix C – Audit Team Letter of Approval



Contact: Alfarid Hussain
Phone: (02) 9474 6456
Email: compliance@planning.nsw.gov.au

Veolia Australia Group Pty Ltd
Level 4, 65 Pirrama Rd
Pyrmont NSW 2009

4 February 2019

Attn: Ms Amandeep Brar, Environmental Planner

Dear Ms Brar

Banksmeadow Transfer Terminal (SSD 5855) – Independent Environmental Audit Team

Reference is made to your letter dated 24 January 2019 seeking approval of Mr Alan Parsons, Managing Director, ARP Risk Management Solutions Pty Ltd as the lead auditor, and Dr Mark Jackson and Mr Rylan Loemker from Jackson Environment and Planning Pty Ltd in assisting roles to undertake an Independent Environmental Audit Report (IEA) required under Schedule 4, Condition 6 of SSD 5855, as modified (**Approval**).

Approval is granted having considered the qualifications and experience of Mr Parsons, Dr Jackson and Mr Loemaker. This approval is conditional upon the auditors' independence from the project.

In preparing the IEA, you should ensure the audit:

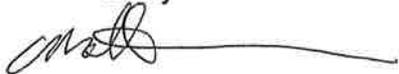
- is conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and the Department's Independent Audit Post Approval Requirements (IAPAR), dated June 2018, available at <https://www.planning.nsw.gov.au/~media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.ashx>;
- include compliance tables as an attachment to the main report indicating the compliance status of each condition of the approval (and any other statutory instrument required to be audited). This table should be consistent with *Appendix A- Independent Audit Table Example* of the IAPAR;
- avoids terms such as "partial compliance". An audit is to make findings of either "compliant" or "non-compliant";
- includes recommended actions in response to non-compliances; and
- identifies opportunities for improved environmental management and performance.

Finally, the Department requests that you:

- review the IEA report to ensure it complies with the relevant conditions of consent, prior to submitting the report to the Secretary; and
- submit an action plan with the audit report(s) detailing your response to the auditor's recommendations and timeframes to implement any adopted recommendations. If you do not agree with an observation or a recommendation, please provide reasons as to why a recommendation can't be adopted.

Should you have any further enquiries about this matter, please contact Alfarid Hussain on (02) 9274 6456 or compliance@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C Mathieson', followed by a long horizontal line extending to the right.

Chris Mathieson
Team Leader – Compliance
As a nominee of the Secretary

Appendix D – Agency Consultation – NSW EPA Response



DOC19/310143-1

Dr Mark Jackson
Director
Jackson Environment and Planning Pty Ltd
Suite 102, Level 1, 25-29 Berry Street
NORTH SYDNEY NSW 2060

via email: mark@jacksonenvironment.com.au

EMAIL

Attention: Rylan Loemker

Dear Dr Jackson

**2019 Independent Environmental Audit – Veolia Environmental Services (Australia) Pty Ltd
Banksmeadow Transfer Terminal**

I refer to your email and letter dated 8 April 2019 regarding an Independent Environmental Audit (IEA) to be undertaken of the Banksmeadow Transfer Terminal operated by Veolia Environmental Services (Australia) Pty Ltd (**Veolia**), located at 34-36 McPherson Street, Banksmeadow NSW (**the Premises**).

Veolia hold Environment Protection Licence (EPL) No. 20581 to undertake waste processing (non-thermal treatment) and waste storage at the Premises. Condition 6 and 7 in Schedule 4 of Development Consent SSD 5855 issued by the Department of Planning and Environment requires the IEA to be completed within 1 year of the date of the consent, and every 3 years thereafter.

The Environment Protection Authority (EPA) provides the following matters for consideration in the IEA:

- The operation and maintainance of the mechanical ventilation system to ensure negative pressure in the putrescible waste and compactor areas as required by condition O7.1 of EPL 20581.
- Stormwater discharges and non-compliances with the requirements of condition L2.4 of EPL 20581 in relation to suspended solids, and the required actions or measures to rectify this issue.
- The environmental performance of the site in relation to offensive odours and section 129 of the *Protection of the Environment Operations Act 1997*, and the effectiveness and adequacy of odour reduction works completed by Veolia at the Premises. The IEA should consider the relationship between the odour reduction works completed, any odour sampling commissioned by Veolia, and any odour complaints received or logged by Veolia.
- Compliance with the relevant Australian Standards and Condition O5.4 of EPL 20581 in relation to bunding and spill containment systems on the Premises.

The compliance history of EPL 20581 can be viewed by searching the EPA's Public Register at:
<https://apps.epa.nsw.gov.au/prpoeoapp/>

If you have any questions regarding this matter please contact Stephanie Todd on (02) 9995 6929.

Yours sincerely

A handwritten signature in blue ink, followed by the date '23/4/19'.

Laura Ansted
A/ Unit Head Waste Compliance
Environment Protection Authority

Appendix E – Agency Consultation – Department of Planning and Environment Response

From: [Alfarid Hussain](mailto:Alfarid.Hussain@planning.nsw.gov.au)
To: rylan@jacksonenvironment.com.au; rylan@jacksonenvironment.com.au
Cc: [Brar, Amandeep](mailto:Brar.Amandeep@planning.nsw.gov.au)
Subject: RE: Agency Consultation - 2019 Independent Environmental Audit - Veolia's Banksmeadow Transfer Terminal
Date: Monday, 15 April 2019 4:51:47 PM

Dear Mr Loemker,

Reference is made to the below email and letter dated 8 April 2019 seeking comment from the Department of Planning and Environment NSW (**Department**) regarding the environmental performance of the Banksmeadow Transfer Terminal (**the project**) approved by the Department under SSD 5855, as modified, to be reviewed as a part of the 2019 Independent Environmental Audit (**IEA**).

Over the past one year, the Department has not received any community complaints or incident notifications in relation to the project. However, the Department requests the auditors determine whether the site's management plans relating to the operational side of the project are being implemented.

Finally, it is noted that a penalty notice was issued to Veolia Environmental Services (Australia) Pty Ltd on 29 March 2017 for failing to remediate the site in accordance with the approved Remediation Action Plan (**RAP**). The Department requests that the IEA report includes an update as to whether the Veolia is remediating the site in accordance with the site's RAP.

If you have any further questions, do not hesitate to contact me on the details below.

Kind regards,

Alfarid Hussain

Compliance Officer

Planning Services

Level 30, 320 Pitt Street | GPO Box 39 | Sydney NSW 2001

T 02 9274 6456 M: 0436 681 733

General Compliance email: compliance@planning.nsw.gov.au



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From: rylan@jacksonenvironment.com.au <rylan@jacksonenvironment.com.au>

Sent: Monday, 8 April 2019 11:19 PM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Cc: Mark Jackson <mark@jacksonenvironment.com.au>

Subject: Agency Consultation - 2019 Independent Environmental Audit - Veolia's Banksmeadow Transfer Terminal

Importance: High

Good evening Mr Mathieson

Please find attached a letter in relation to the Independent Environmental Audit of the Banksmeadow Waste Transfer Terminal, located at 34-36 McPherson Street, Banksmeadow NSW. Jackson Environment and Planning Pty Ltd would like to present the Department with the opportunity to comment on the environmental performance of the Banksmeadow Transfer Terminal, to be reviewed as part of the Independent Environmental Audit of the development.

Please feel free to me on 0427 835 607 or this email should you need any further information.

Regards,

Rylan Loemker BEnvSc (Hons), GradDipBusTech
Senior Consultant
Jackson Environment and Planning Pty Ltd
Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060
T: 02 8056 1849 or M: 0427 835 607
E: rylan@jacksonenvironment.com.au
W: www.jacksonenvironment.com.au

