

Prepared for  
**Veolia Environmental Services (Australia) Pty Ltd**

Prepared by  
**Ramboll Australia Pty Ltd**

Date  
**17 May 2019**

Project Number  
**318000689**

# **2019 INDEPENDENT ENVIRONMENTAL AUDIT VEOLIA WOODLAWN MBT FACILITY**

## 2019 INDEPENDENT ENVIRONMENTAL AUDIT VEOLIA WOODLAWN MBT FACILITY

Revision **Final**  
Date **17 May 2019**  
Made by **Vanessa White, Emily Rowe and Victoria Sedwick**  
Checked by **David Ford**  
Approved by **Victoria Sedwick**  
Description **2019 Independent Environmental Audit of Veolia  
Woodlawn MBT Facility**  
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## GLOSSARY

AEMR	Annual Environmental Management Report
CEMP	Construction Environmental Management Plan
DPE	NSW Department of Planning & Environment
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EMS	Environmental Management System
ENM	Excavated Natural Material
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
ICNG	Interim Construction Noise Guideline
IEA	Independent Environmental Audit
ISO	International Organisation for Standardisation
JSEA	Job Safety and Environment Analysis
MBT	Mechanical Biological Treatment
NSW	New South Wales
OEMP	Operational Environmental Management Plan
PIRMM	Pollution Incident Response Management Manual
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations (Act)
PWS	Paperless Weighbridge System
RAP	Remedial Action Plan
RTS	Response to Submissions Report
SWLMP	Soil, Water and Leachate Management Plan
TSS	Total Suspended Solids
VENM	Virgin Excavated Natural Material
WMBT	Woodlawn MBT
WRVCP	Waste Receipt and Vehicle Control Plan

## 1. EXECUTIVE SUMMARY

Veolia Environmental Services (Australia) Pty Ltd (Veolia) engaged Ramboll Australia Pty Ltd (Ramboll) to conduct an Independent Environmental Audit (the Audit) of the Woodlawn Mechanical Biological Treatment Facility, herein referred to as Woodlawn MBT. Woodlawn MBT is located at 619 Collector Road, Tarago, New South Wales (NSW). Woodlawn MBT is located within the larger Woodlawn Eco-Precinct that comprises the Woodlawn Bioreactor and Crisps Creek Intermodal Facility (IMF). The Project Approval, MP 06\_0239, was granted on 6 November 2007. A Notice of Modification was issued on 17 June 2014. Construction of the Woodlawn MBT commenced in October 2015 and was completed in March 2017. This was followed by a period of commissioning and the Woodlawn MBT was fully operational by July 2017.

Woodlawn MBT accepts municipal mixed solid waste and subjects it to a combination of mechanical and biological treatments to separate out unusable material (e.g. glass and plastic) and recyclable metal and then treat the remaining mainly organic material to produce compost for reuse. Woodlawn MBT holds Environment Protection Licence (EPL) 20476 issued by the NSW Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act).

This is the first Independent Environmental Audit for this development. The Audit Period is from the issue of the Notice of Modification in June 2014 to the date of the Audit site visit, 21 March 2019.

The Auditors assessed the development to be generally compliant with the conditions of Project Approval, MP 06\_0239, and EPL 20476. Three non-compliances were identified, all of which have no recommended actions as they occurred prior to, or during construction, and corrective actions were carried out at the time of the occurrence, or shortly thereafter. Two opportunities for improvement were also identified. The three non-compliances identified were:

EPL 20476 Condition L2.4 – The limit for Total Suspended Solids (TSS) for Discharge Monitoring Point 8 exceeded the 100 percentile concentration limit of 50 mg/L on three consecutive monitoring events (February, June and November 2016). The exceedances were reportedly due to heavy rainfall events before or during monitoring. Veolia undertook corrective action in consultation with the EPA. Given that the exceedances occurred in 2016 and corrective actions were undertaken, the Auditors do not recommend further action.

EPL 20476 Condition M2.1/M2.2 – Two consecutive monitoring rounds for Insoluble Solids were not collected at Monitoring Point 7 due to the late installation of a dust deposition gauge. The dust deposition gauge was subsequently installed and this Condition has been compliant since based upon the available records. Therefore, on this basis, the Auditors do not recommend further action.

EPL 20476 Condition R3.5 (superseded) – Based on the EPA's POEO Public Register EPL 20476, there were four occurrences of a non-compliance with EPL 20476 Condition R3.5 "as monthly reports [were] not provided to the EPA from commencement of construction works on 4 occasions" and the "Licensee [had] rectified [the] matter". On the basis that this Condition was removed from EPL 20476 post-construction, the Auditors do not recommend further action.

## 2. INTRODUCTION

### 2.1 Background

Veolia Environmental Services (Australia) Pty Ltd (Veolia) engaged Ramboll Australia Pty Ltd (Ramboll) to conduct an Independent Environmental Audit (the Audit) of the Woodlawn Mechanical Biological Treatment Facility, herein referred to as Woodlawn MBT. Woodlawn MBT is located at 619 Collector Road, Tarago, New South Wales (NSW). Woodlawn MBT is located within the larger Woodlawn Eco-Precinct that comprises the Woodlawn Bioreactor and Crisps Creek Intermodal Facility (IMF). The Project Approval, MP 06\_0239, was granted on 6 November 2007. A Notice of Modification was issued on 17 June 2014. Construction of Woodlawn MBT commenced in October 2015 and was completed in March 2017. This was followed by a period of commissioning and Stage 1 Woodlawn MBT was fully operational by July 2017.

Woodlawn MBT accepts municipal mixed solid waste and subjects it to a combination of mechanical and biological treatments to separate out unusable material (e.g. glass and plastic) and recyclable metal and then treat the remaining mainly organic material to produce compost for reuse. Woodlawn MBT holds Environment Protection Licence (EPL) 20476 issued by the NSW Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act).

This Independent Environmental Audit (IEA) is required under Condition 6, Schedule 4 of Project Approval MP 06\_0239.

### 2.2 Audit Team

The Audit Team comprised Victoria Sedwick (Lead Auditor), Emily Rowe (Auditor) and Vanessa White (Auditor) of Ramboll. The Audit Report was prepared by the Auditors and reviewed by David Ford (Auditor) and then authorised by the Lead Auditor.

### 2.3 Audit Objectives

The objective of the Audit was to independently and objectively assess the environmental performance and compliance status of the project during the Audit Period.

### 2.4 Audit Scope

The scope for the Audit is taken from Condition 6 (b) to (f) of Schedule 4 of Project Approval MP 06\_0239, as modified in 2014, as follows:

- 6 *Within 2 years of the commencement of operations, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:*
  - a) *be carried out by a suitably qualified, experienced and independent audit team containing a waste management specialist, whose appointment has been endorsed by the Secretary;*
  - b) *include consultation with EPA;*
  - c) *assess the environmental performance of the project, and its effects on the surrounding environment;*
  - d) *determine whether the project is complying with the relevant standards, performance measures and statutory requirements;*
  - e) *review the adequacy of the Environmental Management Plan for the project, compliance with the requirements of this approval, and any other licences and approvals; and, if necessary,*
  - f) *recommend measures or actions to improve the environmental performance of the project, and/or any plan/program required under this approval.*

As required under part b) of Condition 6, the Audit Team consulted with the EPA and under part d) of Condition 6, the Audit also assessed compliance against EPL 20476.

## **2.5 Audit Period**

This is the first Independent Environmental Audit for this development. The Audit Period is from the issue of the Notice of Modification in June 2014 to the date of the Audit site visit, 21 March 2019.

## 3. AUDIT METHODOLOGY

### 3.1 Selection and Endorsement of Audit Team

All of the Ramboll Auditors referred to in Section 2.2 have training and extensive experience in conducting environmental compliance audits and are independent from Veolia. Victoria Sedwick is a certified Lead Auditor with Exemplar Global (Certificate No. 13180). The Audit Team was endorsed by the NSW Department of Planning and Environment (DPE) in a letter dated 29 January 2019 (**Appendix B**).

### 3.2 Independent Audit Scope Development

The scope for the Audit was developed to assess the development's environmental performance in relation to each condition of Project Approval MP 06\_0239 and EPL 20476, which included all post approval documents prepared to satisfy the conditions relevant to the current stage of development.

### 3.3 Compliance Evaluation

The following forms of evidence were gathered during the conduct of the Audit:

- Site inspection of Woodlawn MBT, Tarago on 21st March 2019, which included the taking of photographs;
- Review of documents, reports and other records including approvals, licences, reports prepared to satisfy the conditions, site inspection checklists, site photographs, site plans and drawings, as well as Veolia's correspondence with agencies including the DPE and the EPA;
- Interviews of site personnel (refer Section 3.4);
- Calling the "Community Feedback Line: 1800 241 750" number;
- Phone calls and email communications with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019; and
- Review of documents posted on the internet including Veolia, EPA and DPE websites.

### 3.4 Site Inspection and Interviews

Woodlawn MBT was inspected by the Auditors (Victoria Sedwick, Emily Rowe and Vanessa White) on 21 March 2019. There was one area at the time of the visit, the Fermentation Building, which was not accessed by the Auditors for health and safety reasons. The following Veolia personnel were interviewed on the same day and accompanied the Auditors during the site inspection:

- Ramona Bachu, SHEQ Systems and Assurance Manager, NSW State Office
- Amila Wijedasa, Facility Manager, Woodlawn MBT
- Henare Rakete, Operations Supervisor, Woodlawn MBT
- Christian Chang, Process Engineer, Woodlawn MBT
- Harneet Puarr, Woodlawn Environmental Officer

### 3.5 Consultation

The EPA was consulted concerning this Audit and the environmental performance of Woodlawn MBT. Two phone calls and email correspondence were undertaken with Nick Feneley (refer to Section 4.14).

### 3.6 Compliance Status Descriptors

Although not specifically referenced in Project Approval, MP 06\_0239 and Notice of Modification, this Audit Report has been prepared generally in accordance with the DPE's *Independent Audit Post Approval Requirements* (June 2018). As such, the following compliance status descriptors have been used:

- 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.

Observations have also been made that identify opportunities for improvement.

## 4. AUDIT FINDINGS

### 4.1 Approval and Document List

The following approvals and documents provided by Veolia and/or available on the Veolia website or the EPA website were reviewed by the Auditors:

- Environmental Assessment – Woodlawn Alternative Waste Technology Project, November 2006
- Project Approval, MP 06\_0239, 6 November 2007.
- Environmental Assessment - Woodlawn Alternative Waste Technology Project, December 2013
- Notice of Modification, 17 June 2014.
- EPL 20476
- AEMRs:
  - March 2016
  - November 2016
  - January 2018
  - December 2018
- Woodlawn Mechanical Biological Treatment Facility EPL Monthly Summary:
  - October, November, December 2015
  - January, February, March, April, May, June, July, August, September, October, November, December 2016
  - January, February 2017
- FuelCo, Self Bunded Kube LSK 2500 General Arrangement, Drawing No. LSK-2500-GA, 14 September 2015
- Construction Environmental Management Plan – Woodlawn Mechanical Biological Treatment Facility, March 2016
- Letter from aPLUS plumbing regarding Verification of Compliance – Leachate Barrier System, 24 March 2016
- aPLUS plumbing, Hydraulic Service Plan, Drawing No. H-1001, 1004, 1005
- Copy of Receipt to Goulburn Mularee Council, 18 October 2016
- Annual Return from 22/12/2015 – 21/12/2016, Veolia Environmental Services (Australia) Pty Ltd, Licence 20476, unsigned copy of electronic submission
- Woodlawn Eco Project Complaints Handling Procedure, Document No. PR0-NSW-218-XXX-1, 01 November 2016
- Philip Chun, Occupation Certificate No. 14-203362\_foc1, 30 November 2016
- Operational Environmental Management Plan - Woodlawn Mechanical Biological Treatment Facility, January 2017 (refer Note 1)
- Letter from DPE to Veolia regarding Woodlawn MBT Approval of OEMP MP 06\_0239, 24 January 2017
- Letter from Philip Chun to Veolia regarding Construction Certificate No. 14-203362cc1 and cc2, 30 January 2017
- Letter from DPE to Veolia regarding Noise Audit Team Approval, 11 July 2017

- Letter from Veolia to DPE responding to Approval letter for OEMP MP 06\_0239, 30 August 2017
- SLR, Woodlawn Mechanical Biological Treatment Facility Project Approval (06\_0239) Condition 28 – Noise Audit Report, 30 November 2017
- Letter from Veolia to DPE regarding Submission of Noise Audit Report, dated 6 December 2017
- Annual Return from 22/12/16-21/12/17, Veolia Environmental Services (Australia) Pty Ltd, Licence 20476, unsigned copy of electronic submission
- Woodlawn MBT – Tipping Waste Containers At Reception Building Procedure (undated)
- Woodlawn MBT – Fermentation Operating Procedure (undated)
- Paperless Weighbridge System (PWS) records:
  - PWSReport\_Incoming(31-Dec-2017).xls
  - PWSReport\_Incoming(31-Dec-2018).xls
  - PWSReport\_Incoming(17-Mar-2019).xls
  - PWSReport\_Outgoing\_Ferrous(31-Dec-2017).xls
  - PWSReport\_Outgoing\_Ferrous(31-Dec-2018).xls
  - PWSReport\_Outgoing\_Ferrous(17-Mar-2019).xls
  - PWSReport\_Outgoing\_MWOO(31-Dec-2018).xls
  - PWSReport\_Outgoing\_MWOO(17-Mar-2019).xls
  - PWSReport\_Outgoing\_Residue(31-Dec-2017).xls
  - PWSReport\_Outgoing\_Residue (31-Dec-2018).xls
  - PWSReport\_Outgoing\_Residue (17-Mar-2019).xls
- Ramboll, Independent Environmental Audit – Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 6 June 2018
- NSW Government Gazette No 114 of 2 November 2018
- Annual Return from 22/12/17 – 21/12/18, Veolia Environmental Services (Australia) Pty Ltd, Licence 20476, unsigned copy of electronic submission
- Woodlawn Eco-Precinct Hazardous Substances & Dangerous Goods Register, 21 January 2019
- Copy of Receipt to Goulburn Mularee Council, 29 January 2019
- Letter from DPE to Veolia regarding Woodlawn Mechanical Biological Treatment Facility (Project Approval 06\_0239), Independent Environmental Audit, 29 January 2019
- Woodlawn Bioreactor Complaints Register, for the period 8/12/2005 to 18/2/2019, Excel spreadsheet provided by Veolia, also published on the Veolia website.
- Email from EPA to Ramboll regarding Noise Audit Report, 1 April 2019
- Email from Veolia to DPE regarding delivery of Noise Audit on 6 December, 2017
- Letter from A Plus Plumbing to Lipman Pty Ltd, Re: Veolia MBT Woodlawn, Subcontract No: 1404-6300, Subcontract No: 1404-6300 Design and Construct Hydraulic Services, Verification of Compliance – Leachate Management, 24 November 2016.
- Project Memo from Hatch to Veolia, regarding Woodlawn MBT Facility, Site Water Management and Qualification of Flows, 30 October 2013.
- Letter from Costin Roe Consulting Pty Ltd to Lipman Pty Ltd, Re: Veolia MBT, Collector Road, Woodlawn, NSW, Civil Construction Certification, 23 February 2017.
- Letter from Veolia to the EPA, Re: Update for the Biofilter 2 – Woodlawn Mechanical Biological Treatment Facility, 14 March 2017.

- Plan showing site layout and environmental Monitoring Points, Woodlawn MBT Facility, Collector Road, Tarago, Drawing No. 204543-30, Issue F, LandTeam Australia Pty Ltd, 20 February 2017.
- Woodlawn Site EPL – Monitoring Sites, Drawing No.: TOP-G-001, 17 March 2017.
- EPA’s POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2019.
- EPA’s POEO Public Register EPL 20476, Non-compliance detail, Date Received 16 February 2017, downloaded 25 March 2019.
- EPA’s POEO Public Register EPL 20476, Non-compliance detail, Date Received 22 February 2016, downloaded 25 March 2019.
- Letter from LandTeam Australia to Veolia, Re: Volume Survey at Veolia MBT Facility, 21 December 2018.
- Veolia record ‘Volumetric Survey.pdf’.
- Screenshot of the Veolia Asset Management System (VAMS) relating to the Woodlawn MBT.
- Samples of completed Preventative Work Orders:
  - Work Order, #Weighbridge Calibration – 6 Monthly – due late April/October
  - Work Order, # Monthly January – Biofilter Fans Monthly PM
- Environmental Incident Register ‘Rivo - Environmental Incident.xlsx’
- Woodlawn MBT Monthly Safety Performance Summary, Lipman, May 2016.
- Woodlawn MBT Monthly Safety Performance Summary, Lipman, July 2016
- Woodlawn MBT Monthly Safety Performance Summary, Lipman, October 2016
- ALS Certificate of Analysis, CA1700910, relating to Point 11, 24 February 2017.
- ALS Certificate of Analysis, CA1704314, relating to Point 1, 18 August 2017.
- ALS Certificate of Analysis, CA1705714, relating to Point 12, 30 October 2017.
- ALS Certificate of Analysis, CA1801653, relating to Points 4, 6, and 7, 13 March 2018.
- Excel spreadsheet ‘Weather data - May 2008 - present (1).xlsx’.
- Hydrometric Consulting Services, quarterly service report, 13 November 2018.
- Independent Environmental Audit, Woodlawn Bioreactor and Crisps Creek Intermodal Facility, Ramboll Environ Australia Pty Ltd, 16 December 2016.
- Independent Environmental Audit, Woodlawn Bioreactor and Crisps Creek Intermodal Facility, Ramboll Environ Australia Pty Ltd, 6 June 2018.
- 
- The Tarago Times ([https://www.tarago.org.au/tarago\\_community\\_times.php](https://www.tarago.org.au/tarago_community_times.php))
- Signage at the entrance to the Woodlawn Eco-Precinct.
- eConnect EPA: Annual Return Submitted, 22-12-2017 to 21-12-2018, dated 4 February 2019.
- Veolia, NSW Pollution Incident Response Management Manual, 1/1/2018 (downloaded from the Veolia website).
- Veolia, Emergency Response Plan Incorporating Pollution Incident Response Management Plan For Woodlawn Bioreactor, MBT & LTP, 619 Collector Road, Tarago NSW 2580, Crisps Creek Intermodal Facility, Bungendore Road, Tarago NSW 2580, Pylara Farm, 500 Collector Road, Tarago, NSW 2580, Document Reference: PRO-NSW-218-049-19, 1 August 2018.

- Email from EPA to Veolia, regarding Woodlawn MBT – EPL 20476 – Financial Assurance, 9 February 2017.
- Surface Water Sampling Data Sheets dated 01/02/2016, 10/05/2016, 06/06/2016.

#### **4.2 Compliance Performance**

The Auditors assessed the development to be compliant with Project Approval, MP 06\_0239 and EPL 20476 except for the following non-compliances. Recommendations are not provided for the non-compliances as these were related to the construction period. Refer to Section 5.1 for recommended actions. Refer to the Independent Audit Tables (**Appendix A**) for full details of the identified non-compliances and compliance status of other conditions.

##### **NON-COMPLIANCES**

EPL 20476 Condition L2.4 – The limit for Total Suspended Solids (TSS) for Discharge Monitoring Point 8 exceeded the 100 percentile concentration limit of 50 mg/L on three consecutive monitoring events (February, June and November 2016). The exceedances were reportedly due to heavy rainfall events before or during monitoring. Veolia undertook corrective action. Given that the exceedances occurred in 2016 and corrective actions were undertaken, the Auditors do not recommend further action.

EPL 20476 Condition M2.1/M2.2 – Two consecutive monitoring rounds for Insoluble Solids were not collected at Monitoring Point 7 due to the late installation of a dust deposition gauge. The dust deposition gauge was subsequently installed and this Condition has been compliant since on the basis of available records. Therefore, on this basis, the Auditors do not recommend further action.

EPL 20476 Condition R3.5 (superseded) – Based on the EPA's POEO Public Register EPL 20476, there were four occurrences of a non-compliance with EPL 20476 Condition R3.5 "as monthly reports [were] not provided to the EPA from commencement of construction works on 4 occasions" and the "Licensee [had] rectified [the] matter". On the basis that this Condition was removed from EPL 20476 post-construction, the Auditors do not recommend further action.

#### **4.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions**

No Agency Notices, Orders, Penalty Notices or Prosecutions have been issued in relation to the development.

#### **4.4 Previous Audit Recommendations**

There are no previous audit recommendations for this development.

#### **4.5 EMP, Sub-plans and Post Approval Documents**

The Auditors consider the Construction Environmental Management Plan (CEMP); Operational Environment Management Plan (OEMP); Pest and Weed Management Plan; Soil, Water and Leachate Management Plan (SWLMP); Waste Receipt and Vehicle Control Plan (WRVCP); and Landscaping Management Plan for the Woodlawn MBT to be adequate. A number of opportunities for improvement are identified in Section 4.14.

#### **4.6 EMS**

Veolia has a Business Management System (BMS) that is third party accredited to ISO 14001 which has been implemented across the businesses including the WoodlawnEco Precinct (as per an email from the Veolia National Governance Manager). There is no site specific Environmental Management System (EMS). The Auditors consider management systems to be generally appropriate.

#### **4.7 Environmental Performance**

Veolia has completed the four AEMRs for Woodlawn MBT covering the period October 2015 to 8 September 2018. The AEMRs provided background to Woodlawn MBT as well as a summary of performance for the reporting periods. No significant issues or non-compliances were reported, except the three TSS exceedances that were reported in the November 2016 AEMR.

Management systems and environmental performance of the development are considered by the Auditors to be adequate for the stage of development.

#### **4.8 Complaints**

No complaints have reportedly been received in relation to Woodlawn MBT.

#### **4.9 Incidents**

Two environmental incidents were reported internally in March and December 2018. The incidents were considered minor in nature and as such not reportable to regulators under the requirements for regulating environmental harm. As these were minor incidents, they were not reported in the AEMR and Annual Return. Veolia implemented corrective actions.

#### **4.10 Actual Verses Predicted Environmental Impacts**

As mentioned in Section 4.9, there have been no significant or reportable environmental impacts. The Auditors have not identified inconsistencies between actual environmental impacts and the predicted environmental impacts.

#### **4.11 Site Inspection**

The Auditors carried out a site inspection on 21 March 2018 accompanied by the Veolia personnel referred to in Section 3.4. Photographs taken during the site visit and requested for inaccessible areas are provided in **Appendix D**.

#### **4.12 Site interviews**

A meeting was held at the Woodlawn Eco-Precinct Administration Building on the day of the site visit that involved the Auditors and the Veolia personnel referred to in Section 3.4. Information regarding the history of the site and the Project was provided and documents and records were reviewed. Further information was also provided on request via email.

#### **4.13 Previous Annual Review or Compliance Report Recommendations**

As mentioned in Section 4.7, the November 2016 AEMR reported on TSS exceedances that were subsequently rectified at the time. These exceedances were noted on the EPA's POEO Public Register EPL 20476 Licence Summary. No other non-compliances or complaints were identified in the AEMRs and no recommendations were made.

#### **4.14 Improvement Opportunities**

The following area has been identified as an opportunity for improvement. Refer to Section 5.2 for recommended actions.

- *EPL 20476 Condition M5.2* – EPL 20476 requires that a record must be kept of all complaints and Condition M5.2 requires that the record include a number of details. The Complaints Handling Procedure does not address all of the requirements of M5.2 and it focuses on odour complaints and not all potential types of complaints. An observation for improvement is provided that the procedure(s) and associated records be reviewed to ensure that the required information is fully captured and recorded.
- *EPL 20476 Condition L6.1* – the Auditors note that Mr Nick Feneley of the EPA, advised that he expected Woodlawn MBT to be assessed in the Woodlawn Bioreactor odour audits. An observation for improvement is for future odour audits to take the EPA feedback into account, if it has not already been addressed.
- *MP 06\_0239, Schedule 4, Condition 9* – the Consent requires any plan or program required under this consent, or the completion of any independent audit or AEMR to be made publicly available on the Proponent's website. Previous AEMRs (March 2016 and December 2016) were not available via the Veolia website as the link had been broken. An observation for improvement is that records are to continually maintained on the website.

#### **4.15 Key Strengths**

Woodlawn MBT appeared to be in good condition, well maintained and operated by knowledgeable personnel.

## 5. RECOMMENDATIONS AND OPPORTUNITIES FOR IMPROVEMENT

### 5.1 Recommendations in Relation to Opportunities for Improvement

- a) Review the complaints handling procedure(s) and associated records to ensure that the information required under Condition M5.2 is fully captured and recorded.
- b) Review the scope for Woodlawn Bioreactor odour audits to ensure that Woodlawn MBT is assessed if a potential source for odour.
- c) Ensure that systems are in place to make sure records are continually maintained on the website for an interested party to obtain access.

## 6. CONCLUSIONS

The Auditors assessed the development to be generally compliant with the conditions of Project Approval, MP 06\_0239, and EPL 20476. Three non-compliances were identified, all of which have no recommended actions as they occurred prior to, or during, construction and corrective actions were carried out at the time of the occurrence, or shortly thereafter. Three opportunities for improvement were also identified. Management systems and current environmental performance of Woodlawn MBT are considered to adequate.

## **APPENDIX A INDEPENDENT AUDIT TABLES**

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
<b>Schedule 2 – General Administrative Conditions</b>				
1	The Proponent shall implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, and/or rehabilitation of the project.	<ul style="list-style-type: none"> <li>• CEMP dated May 2014</li> <li>• OEMP dated January 2017</li> <li>• Site Inspection</li> <li>• Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer</li> </ul>	<p>Measures to prevent and/or minimise harm to the environment are outlined in the Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP). Specific requirements of the CEMP and OEMP were audited under the relevant conditions below.</p> <p>Veolia has developed and implemented the measures required under the development consent to prevent and/or minimise any harm to the environment may result from their operations. The review of site documentation; observations and interviews with site representatives demonstrated that the existing environmental management system is considered generally adequate in addressing the development consent requirements.</p>	Compliant
2 (as modified)	<p>The Proponent shall carry out the project generally in accordance with the:</p> <p>(a) EA;</p> <p>(b) statement of commitments;</p> <p>(c) modification application MP 06_0239 MOD 1, accompanying Environmental Assessment dated 20 January 2014 and Response to Submissions dated 6 March 2014 prepared by Veolia Environmental Services (Australia) Pty Ltd; and</p> <p>(c) conditions of this approval.</p> <p><i>Note: The layout of the project is shown in Appendix 1.</i></p>		The Auditors' review of documentation, audit observations and interviews with site representatives demonstrated the operation of the site has to date been conducted generally in accordance with the identified documents and conditions of this consent. Compliance with requirements were audited under specific conditions below.	Noted

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
3	If there is any inconsistency between the above, then the conditions of this consent shall prevail to the extent of the inconsistency.			Noted
4	The Proponent shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any reports, plans, programs or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained in these reports, plans, programs or correspondence.	<ul style="list-style-type: none"> <li>OEMP approval by DPE (24/01/17)</li> <li>Letter to DPE by Veolia providing responses to OEMP additional requirements</li> </ul>	<p>The monitoring program detailed in the Soil, Water and Leachate Management Plan, part of the OEMP, was approved by DPE subject to the installation of a new groundwater monitoring well near the Leachate Aeration Dam.</p> <p>Documentation has been provided which responds to the additional DPE requirements. The additional groundwater monitoring well was installed on 25 January 2017 and baseline data collected on 8 March 2017, prior to the commissioning in March 2017 and commencement of operation in July 2017.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
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5	<p>Waste operations may only take place for 25 years from the commencement of operations on site.</p> <p><i>Note: Under this approval the Proponent is required to decommission the project upon the completion of waste operations and rehabilitate the site to the satisfaction of the Secretary. Consequently, this approval will continue to apply in all other respects other than the right to conduct waste operations on site until the site has been rehabilitated to a satisfactory standard.</i></p>	<ul style="list-style-type: none"> <li>Incoming Waste Inventory Records</li> </ul>	<p>The Woodlawn MBT was commissioned between March and June 2017 and operational in July 2017.</p>	Not triggered
6	<p>With the approval of the Secretary, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.</p>			Noted
7	<p>The Proponent shall ensure that any 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><i>Notes:</i></p> <ul style="list-style-type: none"> <li><i>Under Part 4A of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for any building works.</i></li> <li><i>Part 8 of the EP&amp;A Regulation sets out the detailed requirements for the certification of project.</i></li> </ul>	<ul style="list-style-type: none"> <li>BCA construction certificate June 2017</li> <li>Occupational Certificate No.14-203362_foc1</li> </ul>	<p>BCA construction certificate and Occupational Certificate were provided.</p>	Compliant
8	<p>The Proponent shall ensure that all demolition work is carried out in accordance with AS 2601-2001: <i>The Demolition of Structures</i>, or its latest version.</p>		<p>Construction of the Woodlawn MBT was undertaken on vacant land. No demolition has reportedly occurred at the Woodlawn MBT.</p>	Not triggered

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
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9	The Proponent shall ensure that the plant and equipment used on site, or in connection with the project, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	<ul style="list-style-type: none"> <li>Site Inspection</li> <li>Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer</li> <li>Signed Job Safety and Environmental Analysis (JSEA) examples</li> <li>Veolia Asset Management System (VAMS)</li> </ul>	Veolia's maintenance schedule and records and the training and competency records for operators were viewed onsite. It is understood Veolia's internal safe operating procedures are located on a Google Drive system. The Veolia Asset Management System (VAMS) is also used for scheduling and recording maintenance of plant and equipment at the Woodlawn MBT. Training of the employees is undertaken at least annually, or as required. Review of the procedures is undertaken every 3 years unless considered to be high risk and then reviewed annually.	Compliant
<b>Schedule 3 – Special Environmental Conditions</b>				
<b>WASTE MANAGEMENT</b>				
1	The Proponent shall only receive waste on site that has been railed to the Crisps Creek Intermodal Terminal from the Sydney Metropolitan Area. However, with the written approval of the Secretary the Proponent may receive waste on site from LGAs outside the Sydney Metropolitan Area. In seeking this approval, the Proponent shall submit a detailed assessment of the potential impacts associated with the receipt of this waste, including the potential traffic and traffic noise impacts.	<ul style="list-style-type: none"> <li>Incoming Waste Inventory Records</li> </ul>	Based on incoming waste records since the start of operation, receipt of waste has only been via Crisps Creek Intermodal Terminal which receives waste from Clyde Waste Transfer Station and Banksmeadow Transfer Terminal.	Compliant

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<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
2	<p>The Proponent shall not receive:</p> <p>(a) more than:</p> <ul style="list-style-type: none"> <li>• 240,000 tonnes of mixed waste a year on site; and</li> <li>• 40,000 tonnes of garden waste on site; and</li> </ul> <p>(b) waste on site that is:</p> <ul style="list-style-type: none"> <li>• contaminated by chemicals and/or pathogens that would not be rendered harmless by operations on site, or that may constitute a health or environmental risk, including clinical and related waste and diseased carcasses; and</li> <li>• classified as hazardous waste or industrial waste.</li> </ul>	<ul style="list-style-type: none"> <li>• Incoming Waste Inventory Records</li> </ul>	<p>According to waste inventory incoming records the following has been received to site:</p> <ul style="list-style-type: none"> <li>• 08/03/2017-31/12/2017 – 66,433.56 tonnes</li> <li>• 01/01/2018-31/12/2018 – 133,261.44 tonnes</li> <li>• 01/01/2019- 17/03/2019 – 28,132.33 tonnes</li> </ul> <p>It should be noted that under the EPL, a maximum limit of 144,000 tonnes per year of general solid waste (putrescible) is permitted to account for Stage 1 (refer to Condition L3.1 in EPL).</p>	Compliant

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3	<p>The Proponent shall:</p> <p>(a) implement suitable procedures to:</p> <ul style="list-style-type: none"> <li>ensure that the site does not accept wastes that are prohibited; and</li> <li>screen incoming waste loads; and</li> </ul> <p>(b) ensure that:</p> <ul style="list-style-type: none"> <li>all waste sludges and wastes that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; and</li> <li>staff receive adequate training in order to be able to recognise and handle any hazardous or other unapproved waste.</li> </ul>	<ul style="list-style-type: none"> <li>Internal Procedures</li> <li>Signed JSEAs</li> <li>Interview with Facility Manager, Operations Supervisor, Process Engineer and Woodlawn Precinct Environmental Officer</li> </ul>	<p>Screening procedures observed at the Woodlawn MBT include:</p> <ul style="list-style-type: none"> <li>Screening of waste in the receival pit via observation where foreign objects are identified and separated; and</li> <li>During pre-treatment in the Biological Rotating System (BRS) drums where heavy material is separated.</li> </ul> <p>Rejected material from the screening process is transferred to the Woodlawn Bioreactor. All waste is processed during the BRS pre-treatment and liquids removed via leachate drainage. Internal procedures and screening of foreign or reject materials were observed during the site inspection. It is understood staff undertake JSEAs prior to each work activity and are trained annually, or when required.</p>	Compliant

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4 (as modified)	<p>Except for the following, the Proponent shall dispose of all outputs produced on site to the Woodlawn Landfill:</p> <p>(a) recyclables extracted and delivered off-site for resource recovery purposes;</p> <p>(b) restricted solid waste and hazardous waste extracted from the input waste stream and lawfully disposed of off-site; and</p> <p>(c) compost output products approved for use under the POEO Act and Regulations.</p> <p><i>Note: This approval does not alter the restrictions on input rates in the current approval for the Woodlawn Landfill in any way.</i></p>	<ul style="list-style-type: none"> <li>• Outgoing Waste Inventory Records</li> <li>• OEMP dated January 2017</li> <li>• Site Inspection</li> <li>• Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer</li> <li>• Interview with the EPA representative</li> <li>• NSW Government Gazette No 114 of 2 November 2018</li> </ul>	<p>The Waste Receipt Vehicle Control Plan, which is part of the OEMP, has been provided and approved by DPE.</p> <p>The Auditors have reviewed outgoing waste inventory records; the Waste Receipt Vehicle Control Plan; and sighted waste outputs during site visit. Recyclable material (i.e. ferrous metals) are reported to be transported to One Steel Recycling. No restricted solid waste and hazardous waste have been reported at the Woodlawn MBT.</p> <p>A site-specific Resource Recovery Order and Exemption had been issued by the EPA to enable the application of compost to land in areas at the Woodlawn site. The Order imposed the requirements that must be met by the Woodlawn MBT, as the supplier of the compost derived from mixed waste.</p> <p>The Resource Recovery Exemption specific to Veolia and industry general Exemption were revoked in October 2018. As such, product from the Woodlawn MBT is now disposed of to the Woodlawn Bioreactor.</p>	Compliant

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5	<p>Within 3 years of commissioning the plant on site, or as directed by the Secretary, the Proponent shall:</p> <p>(a) review the criteria in condition 4(c) above in consultation with the EPA with a view to moving to approved criteria under the POEO Act and Regulations or establishing criteria that are specifically appropriate for the use in mine rehabilitation at the adjoining Woodlawn mine; and</p> <p>(b) comply with any revised criteria set under the POEO Act and Regulations or by the Secretary.</p>			Not triggered

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<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
6	<p>The Proponent shall prepare and implement a Waste Monitoring Program for the project to the satisfaction of the Secretary. This program must:</p> <p>(a) be prepared in consultation with EPA by a suitably qualified and experienced expert; and</p> <p>(b) include a suitable program to monitor the:</p> <ul style="list-style-type: none"> <li>• quantity, type and source of waste received on site; and</li> <li>• quantity, type and quality of the outputs produced on site.</li> </ul>	<ul style="list-style-type: none"> <li>• OEMP, dated January 2017</li> <li>• OEMP approval by DPE (24/01/17)</li> <li>• Woodlawn MBT - Tipping Waste Containers At Reception Building Procedure</li> <li>• Incoming and Exporting Waste Inventory Records</li> <li>• Interview with the EPA representative</li> </ul>	<p>A waste management system has been incorporated into the OEMP and Veolia had consulted DPE and EPA in producing this program. Approval by the DPE was sighted. The waste management system incorporates a Waste Receipt and Vehicle Control Plan. The Plan details waste transport vehicles entering and exiting the site are weighed on a weighbridge to confirm the weight of waste entering and deposited at the site. The information is maintained through a Weighbridge Management System and provides the following information:</p> <ul style="list-style-type: none"> <li>• Date</li> <li>• Vehicle Registration</li> <li>• Customer</li> <li>• Waste type</li> <li>• Gross and Tare Weight</li> <li>• Gross and Tare Time</li> <li>• PWS Docket Number</li> </ul> <p>It should be noted that within the Waste Receipt and Vehicle Control Plan, the receipt of solid waste is from municipal, commercial and industrial sources within the Sydney Metropolitan Area. The material is initially screened at the Clyde Waste Transfer Station and Banksmeadow Transfer Terminal prior to transportation to the Woodlawn MBT via Crisps Creek Intermodal.</p>	Compliant
<b>CONSTRUCTION, OPERATION &amp; REHABILITATION</b>				

<p>7</p>	<p>The Proponent shall:</p> <p>(a) ensure the floor of the waste processing building (see figure in Appendix 1) is comprised of a concrete pad that is at least 10cm thick;</p> <p>(b) install a leachate barrier system on any surface to be used for the direct impoundment of leachate, such as the composting and other outdoor areas;</p> <p>(c) ensure that this leachate barrier system:</p> <ul style="list-style-type: none"> <li>• has a re-compacted clay or modified soil layer that is at least 60 centimetres thick and has an in-situ coefficient of permeability of less than <math>1 \times 10^{-7}</math> mis, or some other suitable liner approved by EPA; and</li> <li>• drains to the leachate dams at a minimum gradient of 0.5%;</li> </ul> <p>(d) collect all leachate in the leachate dams to prevent it from escaping from the site to surface water, groundwater or subsoil;</p> <p>(e) treat all water from waste storage or handling areas, including the organic waste storage area, or that has been contaminated by leachate, as leachate;</p> <p>(f) ensure that the leachate dams:</p> <ul style="list-style-type: none"> <li>• are capable of accepting a 1 in 10-year, 24-hour duration storm event without overflowing;</li> <li>• have a re-compacted clay or modified soil layer that is at least 90 centimetres thick and an in-situ coefficient of permeability of less than <math>1 \times 10^{-9}</math> mis, or some other suitable liner approved by EPA;</li> <li>• have sides with a slope of less than 1 vertical to 3 horizontal; and</li> <li>• have a 0.5 metre freeboard at all times.</li> </ul>	<ul style="list-style-type: none"> <li>• Site Inspection</li> <li>• Soil, Water Leachate Management Plan (SWLMP) as part of the OEMP</li> <li>• Leachate Barrier System Installation Certificate (24/11/16)</li> <li>• Leachate Drainage Plan</li> </ul>	<p>The Leachate Management Plan, which is part of the OEMP, has been designed to ensure contaminated water and/or leachate drains to the leachate aeration dam. The following information has also been provided as part of the SWLMP:</p> <ul style="list-style-type: none"> <li>• The floor of the processing buildings that comes in contact with waste and any other operational areas likely to be in contact with leachate, have been constructed with concrete at least 10cm thick of concrete.</li> <li>• A leachate barrier system was installed as per requirements detailed in condition (c) in the compost storage area, to ensure the direct impoundment of leachate within this area.</li> <li>• All leachate is collected in the leachate aeration pond recorded to be designed in accordance with condition (f).</li> </ul> <p>The Auditors sighted the Leachate Barrier System Installation Certificate.</p> <p>During the site inspection, specific design aspects including the concrete pads and 0.5 m freeboard could be observed.</p>	<p>Compliant</p>
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<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
8	The Proponent shall manage windrow composting operations in accordance with <i>AS 4454-2003: Composts, Soil Conditioners and Mulches</i> , Appendix N, Best practice guidelines for Composting Systems, or other practices approved by the EPA. [Note: AS 4454 has been reissued in 2012 and Appendix N amended]	<ul style="list-style-type: none"> <li>OEMP approval by DPE (24/01/17)</li> <li>Site Inspection</li> <li>Woodlawn MBT – Fermentation Operating Procedure</li> <li>Facility Photographs</li> </ul>	<p>As detailed in the OEMP, windrow stockpiles in the fermentation building are being kept aerobic and moisture levels are adjusted to minimise anaerobic conditions, which can lead to higher odour levels. As part of the OEMP, the management measure had been approved by DPE.</p> <p>The Auditors have sighted internal operating procedures used to monitor and control the composting process. The Auditors did not enter the fermentation building due to Woodlawn MBT health and safety protocol; however, the Auditors were supplied photographs from within the building. No significant odours were observed during the site visit.</p>	Compliant
9	The Proponent shall: (a) implement suitable measures to prevent the unnecessary proliferation of litter both on and off site; and (b) inspect and clear the site (and if necessary, surrounding area) of litter on a daily basis.	<ul style="list-style-type: none"> <li>Site Inspection</li> <li>Housekeeping and Inspection Procedure, part of the OEMP</li> <li>Interview with Facility Manager</li> </ul>	<p>The Woodlawn MBT is observed to be maintained in good condition, with no litter observed beyond the waste processing area during the site visit.</p> <p>Veolia personnel undertake daily inspections of the Woodlawn MBT. In addition, formal inspections in accordance with the Housekeeping and Inspection Procedure are undertaken.</p>	Compliant

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10	<p>The Proponent shall:</p> <p>(a) implement suitable measures to manage pests, vermin and declared noxious weeds on site; and</p> <p>(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 the surrounding area.</p> <p><i>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</i></p>	<ul style="list-style-type: none"> <li>Pest and Weed Management Plan, part of the Woodlawn Bioreactor OEMP</li> </ul>	<p>The existing Pest and Weed Management Plan implemented for the Woodlawn Eco Precinct includes pest and weed management measures and a description of the monitoring program undertaken at the Woodlawn MBT.</p> <p>The Woodlawn MBT implements management measures in accordance with the Woodlawn Eco Precinct.</p>	Compliant
11	<p>The Applicant shall:</p> <p>(a) implement suitable measures to minimise the risk of fire on site;</p> <p>(b) extinguish any fires on site promptly; and</p> <p>(c) maintain adequate fire-fighting capacity on site.</p>	<ul style="list-style-type: none"> <li>Emergency Response Plan, part of the OEMP (draft dated 19/01/17) (current version dated 01/08/18)</li> </ul>	<p>An Emergency Response Plan has been implemented for the Eco Project Site. The Plan is inspected and reviewed annually. The draft Emergency Response Plan dated 19/01/17 was approved by DPE which was subsequently superseded by the current Emergency Response Plan dated 01/08/18 was also viewed for the Woodlawn MBT.</p>	Compliant
12	<p>Upon the cessation of waste operations, the Proponent shall decommission the project and rehabilitate the site to the satisfaction of the Secretary.</p>			Not Triggered

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13	<p>The Proponent shall prepare and implement a Rehabilitation and Closure Plan for the project to the satisfaction of the Secretary. This plan must be:</p> <p>(a) be prepared in consultation with EPA, SCA, Palerang Council and Goulburn Mulwaree Council by a suitably qualified and experienced expert whose appointment has been approved by the Secretary;</p> <p>(b) be submitted to the Secretary for approval at least 6 months prior to the eighth independent environmental audit of the project (see schedule 4), or as directed otherwise by the Secretary;</p> <p>(c) define the objectives and criteria for rehabilitation and closure;</p> <p>(d) investigate options for the future use of the site;</p> <p>(e) describe the measures that would be implemented to achieve the specified objectives and criteria for rehabilitation and closure;</p> <p>(f) calculate the cost of implementing these measures; and</p> <p>(g) describe how the performance of these measures would be monitored over time.</p>			Not Triggered
<b>SOIL, WATER &amp; LEACHATE MANAGEMENT</b>				
14	<p>Except as may be expressly provided in an EPL for the project, the Proponent shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i>.</p>		Refer to EPL Schedule 3 Condition L1.1 in Table B-1.	Compliant

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15	The Proponent shall store all chemicals, fuels and oils used on site in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. These bunds shall be designed and installed in accordance with the requirements of all relevant Australian Standards, and/or EPA's Environmental Protection Manual <i>Technical Bulletin Bunding and Spill Management</i> .	<ul style="list-style-type: none"> <li>• Site Inspection</li> <li>• Site Plans</li> <li>• Dangerous Goods Inventory</li> <li>• Engineered Drawings of the Diesel Tank</li> <li>• Facility Photographs</li> </ul>	<p>A 2500L diesel tank is located on site. It is self-bunded and therefore does not require a separate bund. Small quantities of other chemicals are stored at the Woodlawn MBT on hardstand areas with appropriate containment.</p> <p>It should be noted photographs were provided of the storage of chemicals in the workshop and not observed during the site visit.</p>	Compliant
16	<p>The Proponent shall prepare and implement a Soil, Water and Leachate Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be submitted to the Secretary for approval prior to carrying out any development on site;</p> <p>(b) be prepared by a suitably qualified and experienced expert;</p> <p>(c) be prepared in consultation with the EPA and SCA; and</p> <p>(d) include:</p> <ul style="list-style-type: none"> <li>• a site water balance;</li> <li>• an erosion and sediment control plan;</li> <li>• a stormwater management scheme;</li> <li>• a surface water, groundwater and leachate monitoring program; and</li> <li>• a surface water, groundwater and leachate response plan.</li> </ul>	<ul style="list-style-type: none"> <li>• SWLMP, part of the OEMP</li> <li>• OEMP approval by DPE (24/01/17)</li> <li>• Interview with the EPA representative</li> </ul>	<p>DPE approved the January 2017 revision of the Soil, Water and Leachate Management Plan prior to operations commencing July 2017. Veolia noted in the Plan that consultation had been conducted with Water NSW, DPE and EPA in preparing the documentation.</p> <p>The Auditors consider that the SWLMP adequately addresses each of the requirements detailed in condition (d).</p>	Compliant

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17	The site water balance must: (a) identify the source of all water collected or stored on the site, including rainfall, stormwater and groundwater; (b) include details of all water use on site and any discharges; (c) describe the measures that would be implemented to minimise water use on site.	<ul style="list-style-type: none"> <li>SWLMP, part of the OEMP</li> <li>OEMP approval by DPE (24/01/17)</li> </ul>	<p>The site water balance is provided in the SWLMP, part of the OEMP. The site water balance includes sources; water use and discharge; and the reuse of water in the leachate aeration pond and from rainwater tanks. The Plan has been approved by DPE.</p> <p>The Auditors consider that the site water balance adequately addresses each of the requirements detailed in conditions (a)-(c).</p>	Compliant
18	The erosion and sediment control plan must: (a) be consistent with the requirements in the latest version of <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom); (b) identify the activities on site that could cause soil erosion and generate sediment; and (c) describe what measures would be implemented to: <ul style="list-style-type: none"> <li>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</li> <li>maintain these structures over time.</li> </ul>	<ul style="list-style-type: none"> <li>EPA Annual Return (2016 - 2018)</li> <li>SWLMP, part of the CEMP and OEMP</li> </ul>	<p>Sediment and erosion controls were set out in the CEMP and OEMP. Control measures are reported to be maintained weekly during dry weather periods; and within 24 hours of the cessation of a rainfall event.</p> <p>Reported in the 2016 Annual Return, Total Suspended Solid (TSS) concentrations for Point 8 exceeded the concentration limit on three occurrences. A hay bale sedimentation trap was installed to reduce/eliminate unfiltered discharge and a sedimentation trap was later installed in March 2016. No concentration exceedances have been detected since.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
19	The stormwater management scheme must: (a) be consistent with the guidance in the latest version of <i>Managing Urban Stormwater: Council Handbook</i> (DEC); (b) be capable of capturing and storing all rainfall and stormwater runoff from areas where waste (including organic outputs) is handled up to an including a 1 :100-year, 24-hour duration storm event: and (c) include the detailed plans for the proposed surface water management system (shown conceptually in Appendix 4).	<ul style="list-style-type: none"> <li>• SWLMP, part of the OEMP</li> <li>• Appendix D1.2 of SWLMP</li> <li>• Occupation Certificate No.14-203362</li> <li>• DPE Approval Letter for the OEMP dated 24/01/17</li> <li>• Letter from Costin Roe Consulting regarding Civil Construction Certificate dated 23/02/17</li> </ul>	<p>The Woodlawn MBT has implemented a surface water management system, consistent with the requirements of <i>Managing Urban Stormwater: Council Handbook</i>.</p> <p>Stormwater Management Compliance verification was provided by the Woodlawn MBT dated 24/11/2016.</p> <p>The system is detailed in the OEMP including a detailed plan provided in Appendix D1.2 of the SWLMP, approved by DPE.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
20	<p>The surface water, groundwater, and leachate monitoring program must:</p> <p>(a) be generally consistent with the guidance in EPA's <i>Environmental Guidelines for Composting &amp; Related Organics Processing Facilities</i>; and</p> <p>(b) include:</p> <ul style="list-style-type: none"> <li>• baseline data;</li> <li>• details of the proposed monitoring network; and</li> <li>• the parameters for testing and respective trigger levels for action under the surface water, groundwater and leachate response plan (see below).</li> </ul>	<ul style="list-style-type: none"> <li>• SWLMP, part of the OEMP</li> <li>• DPE Approval Letter for the OEMP dated 24/01/17</li> <li>• Letter to DPE by Veolia providing responses to OEMP additional requirements</li> </ul>	<p>The monitoring program is detailed in the Soil, Water and Leachate Management Plan, part of the OEMP. The program was approved by DPE subject to the installation of a new groundwater monitoring well near the Leachate Aeration Dam.</p> <p>Documentation has been provided which responds to the additional DPE requirements. The additional groundwater monitoring well was installed on 25 January 2017 and baseline data collected on 8 March 2017, prior to the commencement of operation in July 2017.</p> <p>The Auditors are satisfied the program is being followed.</p>	Compliant
21	<p>The surface water, groundwater and leachate response plan must:</p> <p>(a) include a protocol for the investigation, notification and mitigation of any exceedances of the respective trigger levels; and</p> <p>(b) describe the array of measures that could be implemented to respond to any surface or groundwater contamination that may be caused by the development.</p>	<ul style="list-style-type: none"> <li>• SWLMP, part of the OEMP</li> <li>• DPE Approval Letter for the OEMP dated 24/01/17</li> </ul>	<p>The response plan is detailed in the Soil, Water and Leachate Management Plan, part of the OEMP. The program was approved by DPE.</p>	Compliant
<b>ODOUR</b>				

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
22 (as modified)	The Applicant shall ensure that the project does not cause or permit the emission of offensive odour (as defined in the POEO Act).	<ul style="list-style-type: none"> <li>• Site Inspection</li> <li>• Odour Complaints Register</li> <li>• Consultation with the EPA representative</li> </ul>	<p>No offensive odours were observed during the site inspection; at the entry to the Woodlawn Eco Precinct or outside of the waste processing buildings at the Woodlawn MBT. No complaints have been received in relation to the Woodlawn MBT.</p> <p>Based on the available evidence, the Auditors consider that the odours emitted by the Woodlawn MBT are not significant.</p> <p>The Auditors note that the EPA Officer advised that he expected the Woodlawn MBT to be assessed as a potential source of odour during the Woodlawn Bioreactor odour audits. The Auditors recommend that future odour audits take the EPA feedback into account if it has not already been addressed.</p>	Compliant
<b>AIR QUALITY</b>				

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
23	The Proponent shall ensure that dust generated by the project does not cause additional exceedances of the criteria listed in Tables 1 to 3 (refer to Tables provided in the consent) at any residence on, or on more than 25 percent of, any privately-owned land.	<ul style="list-style-type: none"> <li>• OEMP dated January 2017</li> <li>• Site Inspection</li> <li>• AEMR (2015 – 2018)</li> </ul>	<p>During the site visit, a water truck was in operation suppressing dust on the unsealed surfaces and the Auditors did not observe dust being generated at the Woodlawn MBT during the site visit.</p> <p>Dust monitoring is undertaken monthly at 3 depositional dust gauges which are used to monitor the Woodlawn Eco Precinct. Results are provided and summarised in each Annual Environmental Management Report (AEMR). The annual average dust deposition complied with the criteria at all locations. The Auditors have no reason to believe that dust criteria are exceeded at any private residential receiver.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
24	<p>The Proponent shall prepare and implement an Air Quality Monitoring Program for the project, in consultation with EPA, and to the satisfaction of the Secretary. This program must be submitted to the Secretary for approval prior to construction and include an air monitoring protocol for evaluating compliance with the air quality impact assessment criteria in this consent.</p> <p><i>Note: Initially, this program may concentrate on monitoring the dust deposition impacts of the project. However, in time, it may be expanded to include other pollutants.</i></p>	<ul style="list-style-type: none"> <li>EA dated December 2013</li> <li>CEMP dated May 2014</li> <li>OEMP dated January 2017</li> <li>OEMP dated January 2017</li> <li>DPE Approval Letter for the CEMP and OEMP dated 8/8/14 and 24/01/17</li> <li>Interview with the EPA representative</li> </ul>	<p>Detailed in the EA, air quality impacts were modelled and indicated that air quality pollutant emissions would be below the relevant air quality goals.</p> <p>Dust monitoring is undertaken in accordance with the EPL 20476 (refer to Schedule 4 Condition O3, Table B). Dust Monitoring Program was submitted as part of the CEMP, approved by the DPE prior to the commencement of construction in March 2015 and was subsequently continued as part of the OEMP, approved by the DPE prior to the commencement of operation in July 2017.</p>	Compliant
<b>NOISE</b>				

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
25	<p>The Applicant shall ensure that the noise generated by the development does not exceed the limits in Table 4 (refer to Table in Consent).</p> <p><i>Notes:</i></p> <p>a) <i>Noise from the development is to be measured at the most affected point or within the residential boundary, or at the most affected point within 30 metres of a dwelling (rural situations) where the dwelling is more than 30 metres from the boundary, to determine compliance with the <math>L_{Aeq}</math> (15 minutes) noise limits in the above table. Where it can be demonstrated that direct measurement of noise from the project is impractical, the EPA may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.</i></p> <p>b) <i>The noise emission limits identified in the above table apply under meteorological conditions of:</i></p> <ul style="list-style-type: none"> <li>• <i>wind speeds of up to 3 mis at 10 metres above ground level; or</i></li> <li>• <i>temperature inversion conditions of up to 3°C/100m, and wind speeds of up to 2 mis at 10 metres above ground level.</i></li> </ul>	<ul style="list-style-type: none"> <li>• Construction Noise Management Plan, part of the CEMP</li> <li>• OEMP dated January 2017</li> <li>• Noise Audit Report (30/11/17)</li> </ul>	<p>A construction noise management plan was included as part of the CEMP to outline management if any temporary noise associated with construction of the Woodlawn MBT. No exceedances were recorded in the Construction Monthly summaries and no noise complaints were received.</p> <p>In 2017, a noise audit was undertaken by SLR in response to Condition 28 to assess the noise generated by normal operations. The results of the audit confirmed compliance.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
26	<p>The Proponent shall ensure that the traffic noise generated by the project on the road between the Crisps Creek Intermodal Terminal and the site access road does not exceed 60 dBA <math>L_{Aeq}(1 \text{ hour})</math> at any residence on privately-owned land.</p> <p><i>Note: Traffic noise generated by the project is to be measured in accordance with the relevant procedures in the EPA's Environmental Criteria for Road Traffic Noise.</i></p>	<ul style="list-style-type: none"> <li>Noise Audit Report (30/11/17)</li> <li>Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer</li> </ul>	<p>Detailed in the Noise Audit Report undertaken by SLR, traffic noise generated by trucks travelling between the Crisps Creek Intermodal Terminal and the Woodlawn MBT complies with the assessment criteria.</p> <p>No noise complaints have been received.</p>	Compliant
27 (as modified)	<p>The Proponent shall comply with the operating hours in Table 5, unless otherwise agreed by the Secretary (refer to Table in Consent)</p> <p><i>Note: Operation of BRS Drums and associated infrastructure is permitted to occur over 24 hours</i></p>	<ul style="list-style-type: none"> <li>OEMP dated January 2017</li> <li>Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer</li> <li>Incoming and Outgoing Waste Inventory Records</li> </ul>	<p>Veolia advised that construction and operating hours were within the specified hours.</p> <p>It should also be noted that the waste inventory records confirm that the site does not receive waste on Sundays. Veolia has advised delivery of the waste from Crisps Creek is between 7am – 7pm on Monday to Saturday.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
28	<p>Within 3 months of the commencement of operations, or as directed by the Secretary, the Proponent shall:</p> <p>(a) commission a suitably qualified and experienced expert whose appointment has been approved by Secretary to audit the noise generated by the project during normal operations against the noise and road traffic noise criteria in this approval;</p> <p>(b) send a copy of the audit report to the Department and EPA within 7 days of the completion of the audit.</p>	<ul style="list-style-type: none"> <li>Noise Audit Report (30/11/17)</li> <li>Email from EPA to Ramboll, Subject: Woodlawn MBT – Noise Audit Report, 1 April 2019</li> <li>Approval of Noise Audit Team by DPE (11/7/17)</li> <li>Submission of Noise Audit Report by Veolia (email 6/12/17)</li> </ul>	<p>The Noise Audit Report undertaken by SLR was commissioned by Veolia on 11 July 2017 within 3 months of the commencement of operation.</p> <p>The EPA confirmed they had received the audit on 7 December 2017 and the Auditors have sighted evidence of the delivery of the audit to the DPE on 6 December 2017.</p>	Compliant
<b>METEOROLOGICAL MONITORING</b>				
29	<p>For the life of the project, the Proponent shall ensure that there is a suitable meteorological station in the vicinity of the site that complies with the requirements in the <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i> guideline.</p>	<ul style="list-style-type: none"> <li>OEMP dated January 2017</li> <li>2018 Woodlawn Bioreactor and Crisps Creek Intermodal Facility IEA</li> </ul>	<p>Siting of the existing meteorological station does not meet the requirements of the relevant Australian Standard, in terms of separation distance to the nearest trees. During the 2018 IEA for the Woodlawn Bioreactor and Crisps Creek Intermodal Facility, Veolia obtained advice from the supplier, Hydrometric, that "the current location is acceptable and is probably as good as any location on the site".</p>	Compliant
<b>TRANSPORT</b>				
30 (as modified)	Deleted			Not applicable

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
31 (as modified)	<p>The Proponent shall:</p> <p>(a) provide sufficient car parking on site to accommodate the parking demand of the project;</p> <p>(b) ensure that the:</p> <ul style="list-style-type: none"> <li>car parking is constructed in accordance with the relevant requirements of <i>Australian Standard AS 2890. 1-2004</i>; and</li> <li>internal road network is constructed in accordance with the relevant requirements of <i>Australian Standard AS 2890.2-2002</i>.</li> </ul>	<ul style="list-style-type: none"> <li>Waste Receipt and Vehicle Control Plan (WRVCP), part of the OEMP</li> <li>Site Inspection</li> </ul>	<p>21 car parking for visitors and office staff are located outside of the office building.</p> <p>Veolia has advised that car parking has been accommodated in the WRVCP, part of the OEMP.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
32 (as modified)	<p>The Proponent shall contribute to both Palerang Council and Goulburn Mulwaree Council for the maintenance of the relevant sections of Collector and Bungendore Road that are used by the project. These contributions are to be paid quarterly, are subject to indexation and must be in general accordance with any relevant Section 94 Contributions Plan.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li><i>In the event that one of the Council's does not have a relevant Section 94 Contributions Plan, then the adjoining Council's plan should be used instead.</i></li> <li><i>Goulburn Mulwaree Council's current applicable contributions plan (at 4 April 2014) is the 'Goulburn Mulwaree Section 94 Development Contributions Plan 2009 Amendment No.2'. This plan is subject to indexation each year and is available on Council's website.</i></li> <li><i>Contributions which are directly associated with the local road network shall be separate (in addition to) any royalties Veolia Trust contributes to local community projects.</i></li> </ul>	<ul style="list-style-type: none"> <li>Road Maintenance Receipt from Goulburn Mulwaree Council dated 18/10/16; 29/01/19</li> </ul>	<p>A receipt of the quarterly contributions to the Goulburn Mulwaree Council has been received. Veolia has advised quarterly contributions are paid to the Council.</p> <p>Veolia has advised no invoices have been received from Palerang Council and as such payments are not required at this stage.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
33	<p>Unless the Secretary approves otherwise (see condition 1 in schedule 3), the Proponent shall ensure that:</p> <p>(a) all heavy vehicles associated with the project use the designated heavy vehicle route between the site and the Crisps Creek Intermodal Terminal;</p> <p>(b) heavy vehicles entering or leaving the site with loads are suitably covered; and</p> <p>(c) heavy vehicles leaving the site are cleaned of materials that may fall on the road before they are allowed to leave the site.</p>	<ul style="list-style-type: none"> <li>• Site Inspection</li> <li>• WRVCP, part of the OEMP</li> </ul>	<p>Heavy vehicle restrictions are provided in the Waste Receipt and Vehicle Control Plan, part of the OEMP. Induction and training requirements are also detailed.</p> <p>During the site visit, heavy vehicles were observed travelling along the designated heavy vehicle route and entering the site with loads suitably covered (i.e. containers). The Auditors did not observed vehicles leaving the site.</p> <p>Refer to EPL Schedule 4 Condition O3.3 in Table B.</p>	Compliant
34	<p>The Proponent shall prepare and implement a Transport Code of Conduct for the project to the satisfaction of Secretary. This protocol must:</p> <p>(a) be submitted to the Secretary for approval prior to construction;</p> <p>(b) be prepared in consultation with PC and GMC; and</p> <p>(c) describe the measures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• minimise the impacts of the development on the local and regional road network, including traffic noise; and</li> <li>• ensure that no heavy vehicles use the designated heavy vehicle route during school bus operations on the route.</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic Code of Conduct (April 2011), part of the CEMP</li> <li>• DPE Approval Letter for the CEMP dated 8/8/14</li> <li>• Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer</li> </ul>	<p>Traffic Code of Conduct was supplied to DPE as Appendix C3 of the CEMP, dated May 2014, prior to construction starting in 2015.</p> <p>Veolia has advised the Traffic Code of Conduct is currently being updated.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
34A (as modified)	<p>The Proponent shall prepare and implement a Waste Receipt and Vehicle Control Plan for the project to the satisfaction of the Secretary. The plan shall:</p> <p>(a) be approved by the Secretary prior to the commencement of operation;</p> <p>(b) be prepared in consultation with the EPA;</p> <p>(c) include details of the infrastructure, systems and procedures, that will be implemented to ensure compliance with the requirements of Section 88 of the POEO Act and Clauses 12 and 15 of the Protection of the Environment (Waste) Regulation 2005;</p> <p>(d) include details of all vehicle entry and exit points, including emergency exits; and</p> <p>(e) be incorporated into the Operational Environmental Management Plan for the project.</p>	<ul style="list-style-type: none"> <li>• WRVCP, part of the OEMP</li> <li>• DPE Approval Letter for the OEMP dated 24/01/17</li> <li>• Interview with the EPA representative</li> </ul>	<p>The Waste Receipt and Vehicle Control Plan was prepared as part of the OEMP which was submitted to DPE prior to operations commenced. The Plan was approved by DPE.</p> <p>Veolia noted in the Plan that consultation had been conducted with DPE and EPA in preparing the documentation.</p>	Compliant
<b>VISUAL AMENITY</b>				
35	<p>The Applicant shall ensure that all external lighting associated with the development:</p> <p>(a) does not create a nuisance to surrounding properties or roadways; and</p> <p>(b) complies with <i>AS 4282(INT) 1995- Control of Obtrusive Effects of Outdoor Lighting</i>.</p>	<ul style="list-style-type: none"> <li>• Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer</li> </ul>	<p>Veolia advised minimal external lighting is associated with the Woodlawn MBT. A solar lighting system has been installed at the diesel fuel area.</p> <p>The Approval letter for the CEMP by DPE noted that external lighting requirements during construction were not detailed and note that lighting controls needed to be implemented. Veolia has advised external lighting controls were implemented.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
36 (as modified)	The Proponent shall construct all new buildings associated with the project using materials and colours that complement the surrounding landscape.	<ul style="list-style-type: none"> <li>Landscaping Management Plan, part of the CEMP</li> <li>Site Inspection</li> </ul>	<p>Acknowledgement of the condition has been included into the OEMP and Landscaping Management Plan, both which have been approved by DPE.</p> <p>The Auditors considered the buildings at the site complement the surrounding landscape.</p>	Compliant
37 (as modified)	The Proponent shall prepare and implement a Landscaping Management Plan for the project to the satisfaction of the Secretary. The plan shall: <ul style="list-style-type: none"> <li>(a) be approved by the Secretary prior to the commencement of construction;</li> <li>(b) detail landscaping and vegetation treatments for the project with particular attention to minimising the visibility of the project from residences and public vantage points including Collector Road; and</li> <li>(c) describe the on-going measures that would be implemented to maintain landscaping and vegetation on the site for the life of the project.</li> </ul>	<ul style="list-style-type: none"> <li>Landscaping Management Plan, part of the CEMP</li> <li>DPE Approval Letter for the CEMP dated 8/8/14</li> <li>Site Inspection</li> </ul>	<p>A Landscaping Management Plan was prepared as part of the CEMP. The Plan was prepared and approved by DPE prior to the commencement of construction in 2015.</p> <p>The Auditors observed the landscaped areas during the site visit.</p>	Compliant
<b>Schedule 4 – Environmental Management, Reporting and Auditing</b>				
<b>ENVIRONMENTAL MANAGEMENT PLAN</b>				

<p>1</p>	<p>The Proponent shall prepare and implement an Environmental Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA by a suitably qualified and experienced expert;</p> <p>(b) be submitted to the Secretary for approval prior to commencement of operations;</p> <p>(c) describe in detail the management measures that would be implemented to address:</p> <ul style="list-style-type: none"> <li>• the relevant matters referred to in Section 4 and Appendix B of the EPA's <i>Environmental Guidelines for Composting &amp; Related Organics Processing Facilities</i>; and</li> <li>• the conditions of this approval;</li> </ul> <p>(d) include a copy of:</p> <ul style="list-style-type: none"> <li>• the management plans and monitoring programs required in Schedule 3 of this approval;</li> <li>• a quality assurance program for the design and installation of the leachate management system has been developed in accordance with <i>Australian Standard AS 3905.2</i>;</li> </ul> <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project; and</li> <li>• respond to emergencies; and</li> </ul> <p>(f) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project.</p>	<ul style="list-style-type: none"> <li>• DPE Approval Letter for the OEMP dated 24/01/17</li> <li>• Letter to DPE by Veolia providing responses to OEMP additional requirements</li> </ul>	<p>The OEMP was submitted for review to the DPE on 28 October 2016.</p> <p>DPE has approved the OEMP dated 19/01/17 subject to installation of a new groundwater monitoring well. Subsequent installation and confirmation of the additional requirements were undertaken prior to the commencement of operations in July 2017.</p> <p>Letter provided to DPE responding to OEMP additional requirements was provided 30/08/17 after the commencement of operations.</p>	<p>Compliant</p>
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<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
<b>REPORTING</b>				
2	Prior to carrying out any development on site, and then operations, the Proponent shall certify in writing to the Secretary that it has complied with all the relevant conditions of this approval.	<ul style="list-style-type: none"> <li>• CEMP dated May 2014</li> <li>• OEMP dated January 2017</li> <li>• AEMR dated:                             <ul style="list-style-type: none"> <li>○ March 2016</li> <li>○ November 2016</li> <li>○ January 2018</li> <li>○ December 2018</li> </ul> </li> <li>• Construction Monthly Summaries dated:                             <ul style="list-style-type: none"> <li>○ October 2015 to February 2017</li> </ul> </li> <li>• DPE Approval Letter for the CEMP and OEMP dated 8/8/14 and 24/01/17</li> </ul>	<p>Veolia has produced a CEMP and OEMP prior to construction and operation of the Woodlawn MBT. Veolia has provided construction monthly summaries during the construction stage and AEMRs since the start of construction to comply with the relevant conditions of the approval.</p> <p>DPE has provided Approval letters for each of these plans.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
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3	Within 24 hours of detecting an exceedance of the limits/performance criteria in this approval, or the occurrence of an incident that causes (or may cause) harm to the environment, the Proponent shall notify the Department and EPA of the exceedance/incident.	<ul style="list-style-type: none"> <li>Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer</li> </ul>	Veolia has advised no incidents to have occurred which would require notification to the Department and EPA.	Not triggered
4	Within 6 days of notifying the Department and EPA, the Proponent shall provide a written report to the Department and EPA that: (a) describes the date, time, and nature of the incident; (b) identifies the cause, or likely cause, of the incident; and (c) describes what action has been taken to date address the incident, and what actions are proposed to be implemented in the future to either address the consequences of the incident or avoid a recurrence of the incident.			Not triggered

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
5	<p>Every year from the date of this approval, unless the Secretary agrees otherwise, the Proponent shall submit an AEMR to the Secretary and relevant agencies. The AEMR shall:</p> <ul style="list-style-type: none"> <li>(a) identify the standards and performance measures that apply to the development;</li> <li>(b) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years;</li> <li>(c) include a summary of the monitoring results for the development during the past year;</li> <li>(d) include an analysis of these monitoring results against the relevant:                             <ul style="list-style-type: none"> <li>• impact assessment criteria;</li> <li>• monitoring results from previous years; and</li> <li>• predictions in the EIS;</li> </ul> </li> <li>(e) identify any trends in the monitoring results over the life of the development;</li> <li>(f) identify any non-compliance during the previous year; and</li> <li>(g) describe what actions were or are being taken to ensure compliance.</li> </ul>	<ul style="list-style-type: none"> <li>• AEMR dated:                             <ul style="list-style-type: none"> <li>○ March 2016</li> <li>○ November 2016</li> <li>○ January 2018</li> <li>○ December 2018</li> </ul> </li> </ul>	<p>AEMRs have been prepared for each year since the start of construction in 2015. The AEMRs are structured and presented to address each of the conditions (a) – (g).</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>				
6	<p>Within 2 years of the commencement of operations, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:</p> <p>(a) be carried out by a suitably qualified, experienced and independent audit team containing a waste management specialist, whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with EPA;</p> <p>(c) assess the environmental performance of the project, and its effects on the surrounding environment;</p> <p>(d) determine whether the project is complying with the relevant standards, performance measures and statutory requirements;</p> <p>(e) review the adequacy of the Environmental Management Plan for the project, compliance with the requirements of this approval, and any other licences and approvals; and, if necessary,</p> <p>(f) recommend measures or actions to improve the environmental performance of the project, and/or any plan/program required under this approval.</p>	<ul style="list-style-type: none"> <li>Letter from DPE to Veolia regarding Woodlawn Mechanical Biological Treatment Facility (Project Approval 06_0239), Independent Environmental Audit, 29 January 2019.</li> <li>NSW EPA consultation – telephone calls and email communications with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<p>The Independent Environmental Audit which is the subject of this report was commissioned within two years of the commencement of operation. The Audit Team was endorsed by the DPE. The Auditors consulted the EPA.</p>	Compliant
7	<p>Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, with a response to any recommendations contained in the audit report.</p>		<p>Veolia intends to submit the final report in week commencing 20<sup>th</sup> May 2019.</p>	Compliant

<b>Table A-1: Compliance with Project Approval 06_0239</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
8	Within 3 months of submitting a copy of the audit report to the Secretary, the Proponent shall review and if necessary revise the plans/programs required under this approval to the satisfaction of the Secretary.			Not triggered
<b>ACCESS TO INFORMATION</b>				
9	Within 1 month of the approval of any plan or program required under this consent, or the completion of any independent audit or AEMR required under this approval, the Proponent shall: (a) ensure that a copy of the relevant documents is made publicly available on the Proponent's website; and (b) provide a copy of the relevant document/s to any interested party upon request.	<ul style="list-style-type: none"> <li>• Veolia website (<a href="https://www.veolia.com/anz/our-services/our-facilities/landfills/woodlawn-bioreactor-facility">https://www.veolia.com/anz/our-services/our-facilities/landfills/woodlawn-bioreactor-facility</a>)</li> <li>• DPE Approval Letter for the CEMP and OEMP dated 8/8/14 and 24/01/17</li> </ul>	<p>Information required to be made publicly available on the Veolia website. The following information was not provided on the website:</p> <ul style="list-style-type: none"> <li>• AEMR (dated March 2016 and December 2016)</li> </ul> <p>Veolia advised that during an update of the website in December 2018, a link was broken removing the above documentation. The information has subsequently been uploaded onto the website again.</p> <p>The Auditors recommend records are to be regularly checked that all documents are included on the website and can be accessed.</p>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
<b>1 Administrative Conditions</b>				
<i>A1 What the licence authorises and regulates</i>				
A1.1	<p>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.</p> <p>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 (refer to Table in Licence).</p>			Noted
<i>A2 Premises of plant to which this licence applies</i>				
A2.1	<p>The licence applies to the following premises:</p> <p>WOODLAWN MECHANICAL BIOLOGICAL TREATMENT FACILITY 619 COLLECTOR ROAD, TARAGO NSW 2580</p> <p>PART LOTS 33 AND 69 DP 754919 AND PART LOT 4 DP 830765 AS SHOWN AS HATCHED AREA ON DRAWING 204543-30 "PLAN SHOWING SITE LAYOUT AND</p>			Noted

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	ENVIRONMENTAL MONITORING POINTS", ISSUE B, 17/9/14.			
<i>A3 Information supplied to the EPA</i>				
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 Protection of the Environment Operations (Savings and Transitional) Regulation 1998; 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>			Noted
A3.2	Any other document and/or management plan is not to be taken as part of the documentation in condition A3.1, other than those documents and/or management plans specifically referenced in this licence.			Noted

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
<b>2 Discharge to Air and Water and Applications to Land</b>				
<i>P1 Location of monitoring/discharge points and areas</i>				
P1.1	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 (refer to Table in Licence).	<ul style="list-style-type: none"> <li>Plan showing site layout and environmental Monitoring Points, Woodlawn MBT Facility, Collector Road, Tarago, Drawing No. 204543-30, Issue F, LandTeam Australia Pty Ltd, 20 February 2017.</li> <li>Woodlawn Site EPL – Monitoring Sites, Drawing No.: TOP-G-001, 17 March 2017.</li> </ul>	<ul style="list-style-type: none"> <li>Three air quality monitoring points: 4, 6, 7</li> </ul>	Noted
P1.2	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point (refer to Table in Licence).	<ul style="list-style-type: none"> <li>Plan showing site layout and environmental Monitoring Points, Woodlawn MBT Facility, Collector Road, Tarago, Drawing No. 204543-30, Issue F, LandTeam Australia Pty Ltd, 20 February 2017.</li> <li>Woodlawn Site EPL – Monitoring Sites, Drawing No.: TOP-G-001, 17 March 2017.</li> </ul>	<ul style="list-style-type: none"> <li>Four water monitoring points: 1 (water), 8 (discharge), 11 (groundwater), 12 (leachate); and one discharge point: 8</li> </ul>	Noted
P1.3	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises (refer to Table in Licence).	<ul style="list-style-type: none"> <li>Plan showing site layout and environmental Monitoring Points, Woodlawn MBT Facility, Collector Road, Tarago, Drawing No. 204543-30, Issue F, LandTeam Australia Pty Ltd, 20 February 2017.</li> <li>Woodlawn Site EPL – Monitoring Sites, Drawing No.: TOP-G-001, 17 March 2017.</li> </ul>	<ul style="list-style-type: none"> <li>Two noise monitoring points: 2, 3; and</li> <li>One weather monitoring point: 10</li> </ul>	Noted
<b>3 Limit Conditions</b>				
<i>L1 Pollution of waters</i>				
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.	<ul style="list-style-type: none"> <li>EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2019.</li> <li>EPA's POEO Public Register EPL 20476, Non-compliance detail, Date Received 16 February 2017, downloaded 25 March 2019.</li> <li>Annual Return 22-12-2015 to 21-12-2016.</li> <li>AEMR, Woodlawn Mechanical Biological Treatment Facility, November 2016.</li> </ul>	<ul style="list-style-type: none"> <li>The site maintains separation between leachate generating areas and stormwater with drainage to separate retention dams.</li> <li>Water monitoring is conducted at two surface water locations at the site boundary (Point 8) and downstream in Allionanoyonyiga Creek (Point 1), as</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
			<p>well as one groundwater well (Point 12).</p> <ul style="list-style-type: none"> <li>The Auditors observe that the 100 percentile concentration limit for Total Suspended Solids (Condition L2.4) was exceeded at Discharge Monitoring Point 8 where water discharges from the premises to a waterway / creek. It was reported in the AEMR (November 2016) and corresponding Annual Return, and Veolia implemented corrective actions. The Auditors understand that the EPA did not find Veolia to be non-compliant with Condition L1.1. On this basis the Auditors consider this Condition to be compliant.</li> </ul>	
<i>L2 Concentration limits</i>				
L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number) [in Condition L2.4], 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.			Noted
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.			Noted
L2.3	To avoid any doubt, this condition does not authorise the pollution of			Noted

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	waters by any pollutant other than those specified in the table\.			
L2.4	Water and/or Land Concentration Limits (refer to Table in Licence).	<ul style="list-style-type: none"> <li>EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2019.</li> <li>EPA's POEO Public Register EPL 20476, Non-compliance detail, Date Received 16 February 2017, downloaded 25 March 2019.</li> <li>Annual Return 22-12-2015 to 21-12-2016.</li> <li>Annual Return 22-12-2016 to 21-12-2017.</li> <li>Annual Return 22-12-2017 to 21-12-2018.</li> </ul>	<ul style="list-style-type: none"> <li>Both the Annual Return and the EPA's POEO Public Register EPL 20476 indicate that Total Suspended Solids quarterly monitoring results for Discharge Monitoring Point 8 exceeded the 100 percentile concentration limit of 50 mg/L on three consecutive monitoring events (February, June and November 2016). The exceedances were reportedly due to heavy rainfall events before or during monitoring. Veolia undertook corrective action in consultation with the EPA. Given that the exceedances occurred in 2016 and corrective actions were undertaken, the Auditors do not recommend further action.</li> </ul>	Non-compliant
<i>L3 Waste</i>				
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 "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>	<ul style="list-style-type: none"> <li>Paperless Weighbridge System (PWS) records:                             <ol style="list-style-type: none"> <li>1) PWSReport_Incoming(31-Dec-2017).xls</li> <li>2) PWSReport_Incoming(31-Dec-2018).xls</li> <li>3) PWSReport_Incoming(17-Mar-2019).xls</li> <li>4) PWSReport_Outgoing_Ferrous(31-Dec-2017).xls</li> <li>5) PWSReport_Outgoing_Ferrous(31-Dec-2018).xls</li> <li>6) PWSReport_Outgoing_Ferrous(17-Mar-2019).xls</li> <li>7) PWSReport_Outgoing_MWOO(31-Dec-2018).xls</li> <li>8) PWSReport_Outgoing_MWOO(17-Mar-2019).xls</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>Based on the available evidence, the site receives only one type of waste, referred to as Mixed Waste, comprising a mixture of municipal waste and garden waste, from the Banksmeadow Transfer Terminal and the Clyde Waste Transfer Station.</li> <li>Based on the PWS records for the calendar year 2018, the quantity of incoming waste was 133,261 tonnes, which is less than the EPL limit for General solid waste (putrescible).</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	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. This condition does not limit any other conditions in this licence (refer to Table in Licence).	9) PWSReport_Outgoing_Residue(31-Dec-2017).xls 10) PWSReport_Outgoing_Residue (31-Dec-2018).xls 11) PWSReport_Outgoing_Residue (17-Mar-2019).xls <ul style="list-style-type: none"> <li>Site inspection on 21 March 2019</li> </ul>		
L3.2	The authorised amount of waste permitted on the premises cannot exceed 30,000 tonnes at any one time.	<ul style="list-style-type: none"> <li>Letter from LandTeam Australia to Veolia, Re: Volume Survey at Veolia MBT Facility, 21 December 2018.</li> <li>Veolia record 'Volumetric Survey.pdf'.</li> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<ul style="list-style-type: none"> <li>The Auditors observed that it is difficult to assess the amount of waste on the premises at any one time using the PWS records. The EPA required Veolia to carry out a volumetric survey of the waste and on 18 December 2018, the surveyed quantity was 36,610 m<sup>3</sup>, including the compost maturation pad, which Veolia calculated was approximately 22,885 tonnes when waste density was taken into account. This is less than the EPL limit of 30,000 tonnes.</li> <li>Mr Nick Feneley advised the Auditors that he inspected the premises on 28 March 2019 and was satisfied that the quantity of compost being stored onsite had reduced relative to a previous inspection and the amount of waste being stored onsite at that time was less than the EPL limit.</li> </ul>	Compliant
<b>L4 Noise limits</b>				
L4.1	Noise generated at the premises that is measured at each noise monitoring point established under	<ul style="list-style-type: none"> <li>Woodlawn Mechanical Biological Treatment Facility, Project Approval (06_0239), Condition</li> </ul>	<ul style="list-style-type: none"> <li>Noise monitoring was conducted at residential properties following commencement of operations. Noise</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
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	this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2 (refer to Table in Licence).	28 - Noise Audit Report, SLR Consulting Australia Pty Ltd, 30 November 2017.	levels were assessed to be less than the noise limit.	
<i>L5 Hours of operation</i>				
L5.1	<p>All operational activities at the premises may only be conducted between the hours of 6am and 10pm Monday to Saturday.</p> <p><i>Note: This condition does not apply to emergency situations where works are required to avoid the loss or life or property or to prevent environmental harm.</i></p> <p><i>Note: Operation of BRS drums and associated infrastructure is permitted to occur over 24 hours.</i></p>	<ul style="list-style-type: none"> <li>• PWS records</li> <li>• Site interview on 21 March 2019, Mr Henare Rakete, Operations Supervisor, Woodlawn MBT.</li> </ul>	<ul style="list-style-type: none"> <li>• The Woodlawn MBT Operations Supervisor advised that the site's hours of operation were 6am to 10pm, Monday to Saturday.</li> <li>• The PWS records confirm that the site does not receive waste on Sundays.</li> </ul>	Compliant
<i>L6 Potentially offensive odour</i>				
L6.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	<ul style="list-style-type: none"> <li>• Woodlawn Bioreactor Complaints Register, for the period 8/12/2005 to 18/2/2019, Excel spreadsheet provided by Veolia, also published on the Veolia website.</li> <li>• AEMRs: March 2016; November 2016; January 2018; December 2018.</li> <li>• Annual Return 22-12-2015 to 21-12-2016.</li> <li>• Annual Return 22-12-2016 to 21-12-2017.</li> <li>• Annual Return 22-12-2017 to 21-12-2018</li> </ul>	<ul style="list-style-type: none"> <li>• The Auditors did not observe significant odours outside the buildings on-site.</li> <li>• Based on the available Annual Returns and AEMRs, the Woodlawn MBT has not received any odour complaints.</li> <li>• The Complaints Register is compiled for the Woodlawn Eco-Precinct, which includes the Woodlawn MBT, the</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
		<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019</li> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<p>Woodlawn Bioreactor and the Crisps Creek Intermodal Facility. Whilst odour complaints have been received, the Veolia process for responding to complaints has determined that the source of the odour was not the Woodlawn MBT.</p> <ul style="list-style-type: none"> <li>Based on the available evidence, the Auditors consider that the odours potentially emitted by the Woodlawn MBT are not significant relative to other sources in the Woodlawn Eco-Precinct.</li> <li>Mr Nick Feneley advised that he expected the Woodlawn MBT to be assessed in the Woodlawn Bioreactor odour audits. An observation for improvement is for future odour audits to take the EPA feedback into account, if it has not already been addressed.</li> </ul>	
<b>4 Operating Conditions</b>				
<i>O1 Activities must be carried out in a competent manner</i>				
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.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019</li> </ul>	<ul style="list-style-type: none"> <li>Based on the site inspection and interviews of personnel, the site and its facilities appeared to be managed in a competent manner. The Auditors did not enter the Organic Buffer Storage or Fermentation Building.</li> <li>Personnel interviewed were knowledgeable about their roles and responsibilities.</li> <li>The operators in the Reception Building demonstrated how they</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
			process and handle the waste materials.	
<i>O2 Maintenance of plant and equipment</i>				
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.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019</li> <li>Screenshot of the Veolia Asset Management System (VAMS) relating to the Woodlawn MBT.</li> <li>Samples of completed Preventative Work Orders               <ol style="list-style-type: none"> <li>Work Order, #Weighbridge Calibration – 6 Monthly – due late April/October</li> <li>Work Order, # Monthly January – Biofilter Fans Monthly PM</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>Veolia has a preventative maintenance system, VAMS. All assets including plant and equipment are registered in VAMS and the system issues maintenance and service work orders.</li> <li>As noted above, the operators in the Reception Building demonstrated how they process and handle the waste materials.</li> </ul>	Compliant
<i>O3 Dust</i>				
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>The main roads to access the Woodlawn MBT are paved, thus minimising dust from truck movements.</li> <li>The Auditors observed a water truck in use at the Woodlawn MBT and Woodlawn Bioreactor that was spraying water along the internal roads.</li> </ul>	Compliant
O3.2	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> <li>OEMP, Veolia, 19 January 2017</li> </ul>	<ul style="list-style-type: none"> <li>Site personnel advised that speed limits are implemented on all internal roads including unpaved roads to minimise dust emissions from truck movements.</li> <li>The Auditors observed a water truck in use at the Woodlawn MBT and Woodlawn Bioreactor that was spraying water along the internal roads.</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
			<ul style="list-style-type: none"> <li>The OEMP indicates that sprinklers are used to dampen the outdoor compost piles for dust prevention purposes.</li> </ul>	
O3.2 (super-seded) Refer to Note 1.	The dust control measures detailed in the Construction Dust Management Plan dated May 2014 must be implemented for the duration of construction activities.	<ul style="list-style-type: none"> <li>'Environment Protection Licence Monthly Summary' Reports for the Woodlawn MBT for October 2015 to February 2017.</li> <li>Site inspection and interview on 21 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>Dust monitoring was conducted during construction.</li> <li>Based on the absence of air quality complaints during construction, the Auditors have no reason to believe that this Condition was non-compliant.</li> </ul>	Compliant
O3.3	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>The Auditors observed that the waste is transported from the IMF to site in fully enclosed containers. A second truck that transports rejected waste from the Reception Building to the Bioreactor was observed to be covered appropriately.</li> </ul>	Compliant
<i>O4 Processes and management</i>				
O4.1	The licensee must take all practicable measures to minimise the tracking of mud, waste and other materials by vehicles leaving the premises.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> <li>Environmental Incident Register 'Rivo - Environmental Incident.xlsx'</li> </ul>	<ul style="list-style-type: none"> <li>The external roads and internal roads used by the waste trucks travelling between the IMF and the Woodlawn MBT are paved, thus minimising the risk of tracking mud, waste or other materials leaving the premises. Trucks are visually checked following unloading to ensure that the rear door is properly closed before departure.</li> <li>No evidence of tracking of mud, waste or other materials was sighted by the Auditors on Collector Road or internal roads.</li> <li>There was one reported incident (Incident ID 10012055, 31 December 2018) of a "small amount of [waste] material dropped on few sections of</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
			the road” when some waste material had fallen from a crane onto the roof of a truck container that subsequently left the site. A second truck driver spotted the material and notified the driver who immediately returned to site. The Auditors consider that this was an anomalous occurrence and unlikely to be a regular occurrence supported by the register of environmental incidents and procedures.	
O4.1 (super-seded)  Refer to Note 1.	Prior to the commencement of construction, the licensee must install sediment and erosion controls as set out in Section 6 of the Construction Soil, Water and Leachate Management Plan dated May 2014	<ul style="list-style-type: none"> <li>• ‘Environment Protection Licence Monthly Summary’ Reports for the Woodlawn MBT for October 2015 to February 2017.</li> <li>• Site inspection and interview on 21 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>• The October and November 2015 monthly summary reports indicate that the installation of sediment and erosion controls including sedimentation ponds, silt fence erection and site runoff controls, was completed by the end of November 2015. Based on the available information, the Auditors have no reason to believe that this Condition was non-compliant.</li> </ul>	Compliant
O4.2 (super-seded)  Refer to Note 1.	All erosion and sediment control measure installed on the premises must be inspected and works undertaken to repair and/or maintain these controls: 1. Weekly during dry weather periods; and 2. Within 24 hours of the cessation of a rainfall event causing runoff to occur from the premises.	<ul style="list-style-type: none"> <li>• Woodlawn MBT Monthly Safety Performance Summary, Lipman, May 2016.</li> <li>• Woodlawn MBT Monthly Safety Performance Summary, Lipman, July 2016</li> <li>• Woodlawn MBT Monthly Safety Performance Summary, Lipman, October 2016</li> <li>• AEMR, Woodlawn Mechanical Biological Treatment Facility, November 2016.</li> <li>• Surface Water Sampling Data Sheets dated 01/02/2016, 10/05/2016, 06/06/2016.</li> </ul>	<ul style="list-style-type: none"> <li>• Lipman’s monthly safety performance summaries indicate that four site inspections were conducted per month.</li> <li>• The AEMR, November 2016, contains EPL Monthly Summary reports, which provide a description of project progress including comments on sediment controls. They also provide comment on rectification work on sediment controls, for example use of hay bales, on occasions when</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	The licensee must record all such inspections including observations and works undertaken to repair and/or maintain erosion and sediment controls.		<p>sediment control overflows were observed. For example, the February 2016 report for which there was a TSS exceedance at EPL Point 8 states that "Sediment controls including V drains and are being continually monitored and an area of sedimentation control outflow was identified and rectified by the use of hay bales". The June 2016 report, which was when there was another TSS exceedance, includes photographs of Points 1 and 8 including silt fencing installed upstream of Point 8.</p> <ul style="list-style-type: none"> <li>• Samples of surface water sampling data sheets provide observations relating to discharge flow and turbidity, as well as the weather conditions. The samples provided were recorded during and following rainfall.</li> <li>• The Auditors have been unable to verify that observations of inspections are recorded relating to sediment and erosion controls other than what has been mentioned reported in the EPL Monthly Summary reports. However, based on the reports, the Auditors consider this Condition to be compliant.</li> </ul>	
<i>05 Other operating conditions</i>				
O5.1	The stormwater retention pond must be capable of containing all stormwater runoff generated at the premises during a 24-hour	<ul style="list-style-type: none"> <li>• OEMP, Veolia, 19 January 2017</li> <li>• Occupation Certificate No. 14-203362_foc1, Philip Chun Building Compliance, 30 January 2017.</li> </ul>	<ul style="list-style-type: none"> <li>• The Soil Water &amp; Leachate Management Plan attached as Appendix D1 to the OEMP, state that "the 4.6 ML onsite stormwater</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	duration 1-in-100-year Average Recurrence Interval (ARI) rainfall event.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> <li>Letter from Costin Roe Consulting Pty Ltd to Lipman Pty Ltd, Re: Veolia MBT, Collector Road, Woodlawn, NSW, Civil Construction Certification, 23 February 2017.</li> </ul>	<p>retention pond meets the capacity for a 1 in 100-year ARI 24-hour storm event".</p> <ul style="list-style-type: none"> <li>The Occupation Certificate relies on an Installation Certificate for Stormwater Management Compliance Verification issued by A Plus Plumbing &amp; Building Services Pty Ltd on 24 November 2016. However, the Auditors have not been provided with that verification statement. The Occupation Certificate also relies on a Civil Construction Certificate issued by Lipman Pty Ltd on 23 February 2017.</li> <li>The Lipman Civil Construction Certification confirms "that the existing stilling pond has the capacity to contain stormwater runoff from the site from a 1 in 100 year 24hour storm".</li> </ul>	
O5.2	The leachate aeration pond must be capable of accepting the leachate generated at the premises by any 1-in-10-year, 24-hour-period rainfall event without overflowing.	<ul style="list-style-type: none"> <li>OEMP, Veolia, 19 January 2017</li> <li>Occupation Certificate No. 14-203362_foc1, Philip Chun Building Compliance, 30 January 2017.</li> <li>Letter from A Plus Plumbing to Lipman Pty Ltd, Re: Veolia MBT Woodlawn, Subcontract No: 1404-6300, Subcontract No: 1404-6300 Design and Construct Hydraulic Services, Verification of Compliance – Leachate Management, 24 November 2016.</li> <li>Site inspection and interview on 21 March 2019.</li> <li>Project Memo from Hatch to Veolia, regarding Woodlawn MBT Facility, Site Water Management and Qualification of Flows, 30 October 2013.</li> </ul>	<ul style="list-style-type: none"> <li>The Soil Water &amp; Leachate Management Plan attached as Appendix D1 to the OEMP, states that "The leachate aeration pond of capacity 1.9ML has been designed for a 1 in 10-year ARI 24-hour event".</li> <li>The Occupation Certificate relies on an Installation Certificate for Leachate Management Compliance Verification issued by A Plus Plumbing &amp; Building Services Pty Ltd on 24 November 2016.</li> <li>The Verification of Compliance – Leachate Management confirms that</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
			<p>the "Leachate pond has been designed and built in accordance with the Hatch design documentation with a minimum capacity of 1.95ML. As per the attached as built survey the pond has a capacity of 2.1ML".</p> <ul style="list-style-type: none"> <li>The Hatch memo calculated that the volume of process wastewater (leachate) generated including wet weather contributions from a "100 yr ARI 24 hr duration event (138.7 mm)" was 1.5 ML. The as-built capacity of the leachate aeration pond is approximately 0.6 ML greater than the capacity calculated by Hatch.</li> <li>On the basis of the Hatch calculation, the A Plus Plumbing Verification of Compliance and Lipman Occupation Certificate, the Auditors consider this Condition to be compliant.</li> </ul>	
05.3	A freeboard of at least 0.5 metres must be maintained in the leachate aeration pond at all times.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> <li>Photograph of pole with free board marking.</li> <li>Letter from A Plus Plumbing to Lipman Pty Ltd, Re: Veolia MBT Woodlawn, Subcontract No: 1404-6300, Subcontract No: 1404-6300 Design and Construct Hydraulic Services, Verification of Compliance – Leachate Management, 24 November 2016.</li> </ul>	<ul style="list-style-type: none"> <li>Site personnel monitor a pole in the leachate aeration dam that has tape marking the maximum allowed height for the leachate in the pond. The level in the pond was well below that level.</li> <li>The Verification of Compliance – Leachate Management confirms that the leachate pond has been "designed to have a 0.5m freeboard with pump out requirements by others".</li> </ul>	Compliant
05.4	Waste must not be received in the fermentation building until such time as Biofilter #2 is operational.	<ul style="list-style-type: none"> <li>Occupation Certificate No. 14-203362_foc1, Philip Chun Building Compliance, 30 January 2017.</li> </ul>	<ul style="list-style-type: none"> <li>The Occupation Certificate relies on an Odour Control System Installation Certificate issued by Downer Australia on 10 November 2016. However, the</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
		<ul style="list-style-type: none"> <li>Letter from Veolia to the EPA, Re: Update for the Biofilter 2 – Woodlawn Mechanical Biological Treatment Facility, 14 March 2017.</li> <li>Site inspection and interview on 21 March 2019.</li> </ul>	<p>Auditors have not been provided with that certificate and therefore, cannot verify that the certificate shows Biofilter #2 was operational prior to the issue of the Occupation Certificate in January 2017.</p> <ul style="list-style-type: none"> <li>Site personnel advised that Biofilter #2 was operational prior to commencement of commissioning in March 2017.</li> <li>The update from Veolia to the EPA indicated that Biofilter #2 was “complete and prepared to be used during the wet commissioning of MBT Facility”. On the basis of this update, the Auditors consider this Condition to be compliant.</li> </ul>	
<b>5 Monitoring and Recording Conditions</b>				
<i>M1 Monitoring records</i>				
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.			Noted
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	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> <li>Woodlawn Bioreactor Complaints Register, for the period 8/12/2005 to 18/2/2019, Excel spreadsheet provided by Veolia, also published on the Veolia website.</li> <li>AEMRs: March 2016; November 2016; January 2018; December 2018.</li> <li>ALS Certificate of Analysis, CA1700910, relating to Point 11, 24 February 2017.</li> </ul>	<ul style="list-style-type: none"> <li>Monitoring data is available in a legible form within site records, for example Excel spreadsheets, as well as reported in AEMRs, Annual Returns and on the public website. Records are available for the period from construction through to operation of the Woodlawn MBT.</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	c) produced in a legible form to any authorised officer of the EPA who asks to see them.	<ul style="list-style-type: none"> <li>ALS Certificate of Analysis, CA1704314, relating to Point 1, 18 August 2017.</li> <li>ALS Certificate of Analysis, CA1705714, relating to Point 12, 30 October 2017.</li> <li>ALS Certificate of Analysis, CA1801653, 13 March 2018.</li> <li>Surface Water Sampling Data Sheets dated 01/02/2016, 10/05/2016, 06/06/2016.</li> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<ul style="list-style-type: none"> <li>The Complaints Register that is maintained for the whole Woodlawn Eco-Precinct contains records for more than four years.</li> <li>Mr Nick Feneley advised that the EPA has not requested monitoring data.</li> </ul>	
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.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> <li>ALS Certificate of Analysis, CA1700910, relating to Point 11, 24 February 2017.</li> <li>ALS Certificate of Analysis, CA1704314, relating to Point 1, 18 August 2017.</li> <li>ALS Certificate of Analysis, CA1705714, relating to Point 12, 30 October 2017.</li> <li>ALS Certificate of Analysis, CA1801653, 13 March 2018.</li> <li>Surface Water Sampling Data Sheets dated 01/02/2016, 10/05/2016, 06/06/2016.</li> </ul>	<ul style="list-style-type: none"> <li>Site records include the required information.</li> </ul>	Compliant
<i>M2 Requirement to monitor concentration of pollutants discharged</i>				
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	<ul style="list-style-type: none"> <li>Annual Return 22-12-2015 to 21-12-2016.</li> <li>Annual Return 22-12-2016 to 21-12-2017.</li> <li>Annual Return 22-12-2017 to 21-12-2018.</li> <li>EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2019.</li> <li>EPA's POEO Public Register EPL 20476, Non-compliance detail, Date Received 22 February 2016, downloaded 25 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>The EPA's POEO Public Register EPL 20476 indicates that there were two occurrences of a non-compliance "with M2.1/M2.2 as samples were not collected from MP7 on 2 occasions due to late installation of dust deposition gauge. Licensee has installed gauge". The dust deposition gauge was subsequently installed and this</li> </ul>	Non-compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	measure, and sample at the frequency, specified opposite in the other columns:		Condition has been compliant since on the basis of available records. Therefore, the Auditors do not recommend further action.	
M2.2	Air Monitoring Requirements (refer to Table in Licence).	<ul style="list-style-type: none"> <li>ALS Certificate of Analysis, CA1801653, relating to Points 4, 6, and 7, 13 March 2018.</li> <li>Annual Return 22-12-2015 to 21-12-2016.</li> <li>Annual Return 22-12-2016 to 21-12-2017.</li> <li>Annual Return 22-12-2017 to 21-12-2018.</li> <li>EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2019.</li> <li>EPA's POEO Public Register EPL 20476, Non-compliance detail, Date Received 22 February 2016, downloaded 25 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>Air monitoring using dust deposition gauges has been performed in accordance with Condition M2.2, except for on two occasions due to the late installation of a dust deposition gauge at Monitoring Point 7. The dust deposition gauge was subsequently installed and this Condition has been compliant since on the basis of available records. Therefore, on this basis, the Auditors do not recommend further action.</li> </ul>	Non-compliant
M2.3	Water and/or Land Monitoring Requirements (refer to Tables in Licence).  <i>Note: Special Frequency 1 means once at the commissioning of the monitoring well.</i>	<ul style="list-style-type: none"> <li>ALS Certificate of Analysis, CA1700910, relating to Point 11, 24 February 2017.</li> <li>ALS Certificate of Analysis, CA1704314, relating to Point 1, 18 August 2017.</li> <li>ALS Certificate of Analysis, CA1705714, relating to Point 12, 30 October 2017.</li> <li>ALS Certificate of Analysis, CA1801653, 13 March 2018.</li> <li>AEMRs: March 2016; November 2016; January 2018; December 2018.</li> <li>Annual Return 22-12-2015 to 21-12-2016.</li> <li>Annual Return 22-12-2016 to 21-12-2017.</li> <li>Annual Return 22-12-2017 to 21-12-2018.</li> <li>EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2019.</li> <li>EPA's POEO Public Register EPL 20476, Non-compliance detail, Date Received 22 February 2016, downloaded 25 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>Water monitoring has been performed in accordance with Condition M2.3.</li> <li>Veolia reported non-compliances in the 2016-2017 Annual Return as monitoring requirements were not met for Points 1, 8 and 11 due to dry weather. The EPA advised that it was considered the reporting of the non-compliances in the Annual Return to be appropriate due to the dry weather.</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
		<ul style="list-style-type: none"> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>		
<i>M3 Testing methods – concentration limits</i>				
M3.1	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p> <p>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or</p> <p>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p> <p><i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for</i></p>	<ul style="list-style-type: none"> <li>ALS Certificate of Analysis, CA1801653, relating to Points 4, 6, and 7, 13 March 2018.</li> <li>Independent Environmental Audit, Woodlawn Bioreactor and Crisps Creek Intermodal Facility, Ramboll Environ Australia Pty Ltd, 6 June 2018.</li> </ul>	<ul style="list-style-type: none"> <li>An example of a NATA Certified Certificate of Analysis prepared by ALS for dust samples in a water matrix was reviewed. ALS analytical procedures are generally carried out in accordance with the Approved Methods Publication. Rainfall was also calculated.</li> <li>Two of the three dust gauges, Points 4 and 6, are common to the Woodlawn Bioreactor and the sampling methods, AM-19, was previously assessed and found to be compliant by Ramboll during previous IEAs of the Woodlawn Bioreactor and Crisps Creek IMF facilities. The Auditors requested evidence that the Insoluble Solids monitoring is conducted in accordance with sampling method, AM-19, however, this has not been provided. The Auditors have no reason to believe that the monitoring is not being conducted in accordance with AM-19.</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	<i>the Sampling and Analysis of Air Pollutants in NSW".</i>			
M3.2	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.	<ul style="list-style-type: none"> <li>ALS Certificate of Analysis, CA1700910, relating to Point 11, 24 February 2017.</li> <li>ALS Certificate of Analysis, CA1704314, relating to Point 1, 18 August 2017.</li> <li>ALS Certificate of Analysis, CA1705714, relating to Point 12, 30 October 2017.</li> <li>ALS Certificate of Analysis, CA1801653, 13 March 2018.</li> </ul>	<ul style="list-style-type: none"> <li>Examples of NATA Certified Certificates of Analysis prepared by ALS for water samples (including groundwater, surface water and leachate samples) have been reviewed. ALS analytical procedures are carried out in accordance with the Approved Methods Publication.</li> </ul>	Compliant
<i>M4 Weather monitoring</i>				
M4.1	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively (refer to Table in Licence).	<ul style="list-style-type: none"> <li>Excel spreadsheet 'Weather data - May 2008 - present (1).xlsx'.</li> <li>Hydrometric Consulting Services, quarterly service report, 13 November 2018.</li> <li>Independent Environmental Audit, Woodlawn Bioreactor and Crisps Creek Intermodal Facility, Ramboll Environ Australia Pty Ltd, 16 December 2016.</li> <li>Independent Environmental Audit, Woodlawn Bioreactor and Crisps Creek Intermodal Facility, Ramboll Environ Australia Pty Ltd, 6 June 2018.</li> </ul>	<ul style="list-style-type: none"> <li>Hourly average weather monitoring data is being monitoring on a continuous basis in accordance with M4.1. Whilst the Auditors have not been provided with 24 hour average rainfall, it can be calculated from the 1 hour average data.</li> <li>The meteorological station is common to the Woodlawn Eco-Precinct and its sampling methods were previously assessed and found to be compliant by Ramboll during previous IEAs of the Woodlawn Bioreactor and Crisps Creek IMF facilities. The issue of its siting of was identified during these audits but the station supplier, Hydrometric Consulting Services, reportedly advised Veolia that "that the current location is acceptable and is as good as any location on the site".</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
			<ul style="list-style-type: none"> <li>It was observed that there were two gaps in the data in February 2015 (13 days) and June 2018 (5 days).</li> <li>The December 2018 AEMR does not summarise the weather monitoring data but states that it can be provided on request.</li> <li>The weather monitoring data is not provided or referenced on Veolia's public website for environmental monitoring data.</li> <li>A service report was provided that indicates that the meteorological station is serviced on a quarterly basis.</li> </ul>	
<i>M5 Recording of pollution complaints</i>				
M5.1	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.	<ul style="list-style-type: none"> <li>Woodlawn Bioreactor Complaints Register, for the period 8/12/2005 to 18/2/2019, Excel spreadsheet provided by Veolia, also published on the Veolia website.</li> <li>AEMRs</li> <li>Annual Returns</li> </ul>	<ul style="list-style-type: none"> <li>Based on the available Annual Returns and AEMRs, the Woodlawn MBT has not received any complaints. The Woodlawn Bioreactor Complaints Register is compiled as a spreadsheet that is a legible record and was readily available to the Auditors. There is no Complaints Register for the Woodlawn MBT as no complaints have reportedly been received that were found on investigation to be sourced from the Woodlawn MBT.</li> </ul>	Compliant
M5.2	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;	<ul style="list-style-type: none"> <li>Woodlawn Bioreactor Complaints Register, for the period 8/12/2005 to 18/2/2019, Excel spreadsheet provided by Veolia, also published on the Veolia website.</li> <li>Woodlawn Eco Project Complaints Handling Procedure, PRO-NSW-218-XXX-1, 1/11/2016.</li> <li>Site inspection and interview on 21 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>The following findings relate to the Complaints Register and procedure but the Auditors observed that no complaints have reportedly been received that were found on investigation to be from the Woodlawn MBT.</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	<p>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;</p> <p>d) the nature of the complaint;</p> <p>e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>f) if no action was taken by the licensee, the reasons why no action was taken.</p>		<ul style="list-style-type: none"> <li>The Complaints Handling Procedure focuses on the information requirements for preparing reports to regulatory authorities as opposed to record keeping requirements that meets Condition M5.2. Hence, it does not address all of the requirements of M5.2, for example, the personal details. It also focuses on odour incidents and not all potential types of pollution complaints.</li> <li>The Woodlawn Bioreactor Complaints Register meets the requirements of this Condition. The personal details are recorded separately to the published Complaints Register.</li> <li>An observation for improvement is provided that the procedure(s) and associated records be reviewed to ensure that the required information is fully captured and recorded.</li> <li>Given that the Complaints Register is a combined register for the Woodlawn Eco-Precinct, the register is found on the public website as the 'Woodlawn Bioreactor – Complaints Register'. It is suggested that the register is also included under the search for the Woodlawn MBT.</li> </ul>	
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	<ul style="list-style-type: none"> <li>Woodlawn Bioreactor Complaints Register, for the period 8/12/2005 to 18/2/2019, Excel spreadsheet provided by Veolia, also published on the Veolia website.</li> </ul>	<ul style="list-style-type: none"> <li>The Auditors observed that no complaints have reportedly been received that were found on investigation to be from the Woodlawn MBT. However, the Complaints</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
			Register has been maintained for the Woodlawn Eco-Precinct for a period greater than four years.	
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	<ul style="list-style-type: none"> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Nick Feneley advised that he has not requested complaints data.</li> </ul>	Not triggered
<i>M6 Telephone complaints line</i>				
M6.1	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.	<ul style="list-style-type: none"> <li>Woodlawn Eco Project Complaints Handling Procedure, PRO-NSW-218-XXX-1, 1/11/2016.</li> <li>Site inspection and interview on 21 March 2019.</li> <li>Signage at the entrance to the Woodlawn Eco-Precinct.</li> <li>The Tarago Times (<a href="https://www.tarago.org.au/tarago_community_times.php">https://www.tarago.org.au/tarago_community_times.php</a>)</li> <li>Call to the Woodlawn Bioreactor Community Feedback Line: 1800 241 750, 8 April 2019.</li> </ul>	<ul style="list-style-type: none"> <li>The site has a Woodlawn Bioreactor Community Feedback Line: 1800 241 750, that is advertised in a number of ways including in The Tarago Times, a local community newsletter, and on the sign at the main entrance to the Woodlawn Eco-Precinct.</li> <li>The Auditors verified that the Woodlawn Bioreactor Community Feedback Line: 1800 241 750 was operational.</li> </ul>	Compliant
M6.2	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.	<ul style="list-style-type: none"> <li>Signage at the entrance to the Woodlawn Eco-Precinct.</li> <li>The Tarago Times (<a href="https://www.tarago.org.au/tarago_community_times.php">https://www.tarago.org.au/tarago_community_times.php</a>)</li> </ul>	<ul style="list-style-type: none"> <li>The complaints line telephone number is advertised in The Tarago Times, a local community newsletter, and on the sign at the main entrance to the Woodlawn Eco-Precinct.</li> </ul>	Compliant
M6.3	The preceding two conditions do not apply until either the date of the issue of this licence.			Compliant
<b>6 Reporting Conditions</b>				
<i>R1 Annual return documents</i>				
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:	<ul style="list-style-type: none"> <li>Annual Return 22-12-2015 to 21-12-2016.</li> <li>Annual Return 22-12-2016 to 21-12-2017.</li> <li>Annual Return 22-12-2017 to 21-12-2018.</li> </ul>	<ul style="list-style-type: none"> <li>Based on the EPA website Licence Summary, four Annual Returns have been submitted to the EPA. The Auditors have reviewed completed</li> </ul>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	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. 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.	<ul style="list-style-type: none"> <li>eConnect EPA: Annual Return Submitted, 22-12-2017 to 21-12-2018, dated 4 February 2019.</li> <li>EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2019.</li> <li>Veolia, NSW Pollution Incident Response Management Manual, 1/1/2018 (downloaded from the Veolia website).</li> <li>Veolia, Emergency Response Plan Incorporating Pollution Incident Response Management Plan For Woodlawn Bioreactor, MBT &amp; LTP, 619 Collector Road, Tarago NSW 2580, Crisps Creek Intermodal Facility, Bungendore Road, Tarago NSW 2580, Pylara Farm, 500 Collector Road, Tarago, NSW 2580, Document Reference: PRO-NSW-218-049-19, 1 August 2018.</li> </ul>	Annual Returns for the previous three reporting periods. <ul style="list-style-type: none"> <li>The Auditors confirmed that the site has a Pollution Incident Response Management Manual and a Pollution Incident Response Management Plan (PIRMP) that combined meet the requirements of the Protection of the Environment Operations Act 1997.</li> </ul>	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.  <i>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.</i>	<ul style="list-style-type: none"> <li>Annual Return 22-12-2015 to 21-12-2016.</li> <li>Annual Return 22-12-2016 to 21-12-2017.</li> <li>Annual Return 22-12-2017 to 21-12-2018.</li> </ul>		Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <p>a) 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</p> <p>b) 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> <p><i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i></p>			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> <p>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>b) in relation to the revocation of the licence - the date from which</p>			Not triggered

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	notice revoking the licence operates.			
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').	<ul style="list-style-type: none"> <li>Annual Return 22-12-2015 to 21-12-2016.</li> <li>Annual Return 22-12-2016 to 21-12-2017.</li> <li>Annual Return 22-12-2017 to 21-12-2018.</li> <li>eConnect EPA: Annual Return Submitted, 22-12-2017 to 21-12-2018, dated 4 February 2019.</li> </ul>	The Auditors have reviewed completed Annual Returns for the previous three reporting periods, which appeared to be supplied to the EPA via eConnect.	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.	As above		Compliant
R1.7	Within the Annual Return, the Statements 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.	<ul style="list-style-type: none"> <li>eConnect EPA: Annual Return Submitted, 22-12-2017 to 21-12-2018, dated 4 February 2019.</li> <li>EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2019.</li> </ul>	The Auditors observe that the Annual Returns provided have a Company Secretary as the signatory. Based on the Licence Summary, four Annual Returns have been submitted to and accepted by the EPA. On this basis, the Auditors assume that the Annual Returns, which were submitted electronically, were appropriately signed.	Compliant
<i>R2 Notification of environmental harm</i>				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.  <i>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the</i>	<ul style="list-style-type: none"> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<ul style="list-style-type: none"> <li>No incidents have been notified in accordance with this Condition.</li> </ul>	Not triggered

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	<i>environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</i>			
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.	<ul style="list-style-type: none"> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<ul style="list-style-type: none"> <li>No incidents have been notified in accordance with this Condition.</li> </ul>	Not triggered
<i>R3 Written report</i>				
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.	<ul style="list-style-type: none"> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Nick Feneley advised that the EPA has not requested an R3 written report.</li> </ul>	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.	<ul style="list-style-type: none"> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Nick Feneley advised that the EPA has not requested an R3 written report.</li> </ul>	Not triggered

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
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.	<ul style="list-style-type: none"> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer, Waste Compliance, on 25 March 2019 and 1 April 2019.</li> </ul>	<ul style="list-style-type: none"> <li>Mr Nick Feneley advised that the EPA has not requested an R3 written report.</li> </ul>	Not triggered
R3.4	The EPA may make a written request for further details in relation to any of the above	<ul style="list-style-type: none"> <li>NSW EPA consultation – telephone calls with Mr Nick Feneley, Senior Operations Officer,</li> </ul>	<ul style="list-style-type: none"> <li>Mr Nick Feneley advised that the EPA has not requested an R3 written report.</li> </ul>	Not triggered

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	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.	Waste Compliance, on 25 March 2019 and 1 April 2019.		
R3.5 (super-seded)  Refer to Note 1.	Unless otherwise agreed in writing by the EPA, during construction activities the licensee must submit a monthly report which includes but may not be limited to: a) a brief narrative on the progress of the project; b) a narrative summary and tables of all monitoring data collected for the previous month; c) graphs of all monitoring data collected for the previous month and over the course of the entire project; d) details of; i. any Air Quality Management Plan trigger level exceedances or NSW OEH Air Quality Criteria exceedances (dust), and; ii. water quality monitoring events where the total suspended solids value exceeds 50 mg/L; e) the results of the licencees investigation, findings, and response to elevated trigger	<ul style="list-style-type: none"> <li>EPA’s POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2019.</li> <li>EPA’s POEO Public Register EPL 20476, Non-compliance detail, Date Received 22 February 2016, downloaded 25 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>The EPA’s POEO Public Register EPL 20476 indicates that there were four occurrences of a non-compliance “with R3.5 as monthly reports [were] not provided to the EPA from commencement of construction works on 4 occasions. Licensee has rectified matter. EPA to monitor compliance”. On the basis that this Condition was removed post-construction, the Auditors do not recommend further action.</li> </ul>	Non-compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	<p>value, NSW OEH Air Quality Criteria, TSS, and pH values; and</p> <p>f) any licence non compliances and the results of the any investigations, findings, and responses to these non-compliances.</p> <p>The report must be submitted electronically on the fifth business day of the month for the previous months activities.</p>			
<b>7 General Conditions</b>				
<i>G1 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.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>A copy of the Licence was located in the breezeway of the Woodlawn MBT Admin Office.</li> </ul>	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.			Not triggered
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	<ul style="list-style-type: none"> <li>Site inspection and interview on 21 March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>A copy of the Licence was located in the breezeway of the Woodlawn MBT Admin Office.</li> </ul>	Compliant
<b>8 Special Conditions</b>				
<i>E1 Financial Assurance</i>				
E1.1	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 institution" under the	<ul style="list-style-type: none"> <li>Email from EPA to Veolia, regarding Woodlawn MBT – EPL 20476 – Financial Assurance, 9 February 2017.</li> </ul>	<p>Veolia provided a Bank Guarantee DG573933418 to the EPA prior to 24 February 2017.</p> <p>The EPA confirmed in the email that Condition E1.1 was satisfied.</p>	Compliant

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	<p>Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by no later than 5pm on 24 February 2017.</p> <p>This financial assurance must be in favour of the EPA in the amount 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.</p>			
E1.2	The financial assurance must contain a term that provides that any money claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.	<ul style="list-style-type: none"> <li>Email from EPA to Veolia, regarding Woodlawn MBT – EPL 20476 – Financial Assurance, 9 February 2017.</li> </ul>	The EPA confirmed in the email that Condition E1.2 was satisfied.	Compliant
E1.3	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure.	Refer to E1.2		Noted
E1.4	The financial assurance must be replenished by the full amount claimed or realised if the EPA has			Not triggered

<b>Table A-2: Compliance with Environmental Licence 20476</b>				
<b>APPROVAL (ID)</b>	<b>REQUIREMENT</b>	<b>EVIDENCE COLLECTED</b>	<b>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</b>	<b>COMPLIANCE STATUS</b>
	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.			
E1.5	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.			Not triggered
E1.6	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 and b) the adjusted financial assurance as required by condition E1.5 and E1.6	<ul style="list-style-type: none"> <li>Email from EPA to Veolia, regarding Woodlawn MBT – EPL 20476 – Financial Assurance, 9 February 2017.</li> </ul>		Compliant
E1.7	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.			Noted

Note 1: A previous version of Environment Protection Licence 20476 issued on 22 December 2014 included a number of Conditions (O3.2, O4.1, O4.2, R3.5) relating to construction of the Woodlawn MBT that were subsequently removed following completion of construction. Ramboll has assessed these Conditions as far as practical in the Audit.

## **APPENDIX B PLANNING SECRETARY AUDIT TEAM AGREEMENT**



Amandeep Brar  
Environmental Planner NSW  
Veolia Environmental Services (Australia) Pty Ltd  
Cnr Unwin and Shirley Streets  
ROSEHILL NSW 2142

Dear Amandeep

**Woodlawn Mechanical Biological Treatment Facility (Project Approval 06\_0239)  
Independent Environmental Audit**

I refer to your letter dated 25 January 2019 seeking the Secretary's endorsement for an audit team to undertake the Independent Environmental Audit (audit) under Project Approval 06\_0239 as modified (the approval) for the Woodlawn Mechanical Biological Treatment (MBT) facility.

Having considered the qualifications and experience of the Ramboll Australia Pty Ltd audit team, namely;

- Victoria Sedwick – Exemplar Global Registered Lead Environmental Auditor
- David Ford
- Roesebud Yu
- Emily Rowe
- Venessa White

the Secretary endorses the appointment of this team to undertake the audit in accordance with Condition 6 of Schedule 4 of the approval. This approval is conditional on the audit team being independent of the development.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and meet the requirements of the Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018) which can be accessed at:

<https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>

The audit report is to:

- Include consultation with relevant agencies;
- include a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
- not use the term "partial compliance"

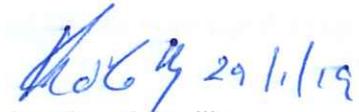
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this approval; and
- identify opportunities for improved environmental management and performance.

Within 3 months of commissioning the audit, or otherwise as agreed by the Secretary, Veolia Environmental Services (Australia) Pty Ltd (Veolia) is to submit a copy of the audit report to the Secretary together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Secretary, it is recommended that Veolia review the report to ensure it complies with the relevant approval condition.

Should you wish to discuss this matter please contact Jennifer Rowe on the details above.

Yours sincerely



Katrina O'Reilly

**Team Leader Compliance**  
*as nominee for the Secretary*

## **APPENDIX C INDEPENDENT AUDIT DECLARATION FORM**

## INDEPENDENT AUDIT DECLARATION FORM

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Project Name: Woodlawn Mechanical Biological Treatment Facility  
Consent Number: Project Approval, MP 06\_0239  
Description of Project: Construction and operation of a materials recycling facility  
Project Address: 619 Collector Road, Tarago, New South Wales  
Proponent: Veolia Environmental Services (Australia) Pty Ltd  
Title of Audit: 2019 Independent Environmental Audit of Veolia MBT Facility  
Date: 17 May 2019

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I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the Audit has been undertaken in accordance with relevant condition(s) of consent and generally in accordance with the *Independent Audit Post Approval Requirements (Department 2018)*;
- the findings of the Audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the Audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this Audit except as otherwise declared to the Department prior to the Audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes :

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Lead Auditor: Victoria Sedwick

Signature:



Qualification: Exemplar Global Lead Auditor Accreditation No.13180

Company: Ramboll Australia Pty Ltd

Company Address: PO Box 560, North Sydney NSW 2060

## **APPENDIX D SITE INSPECTION PHOTOGRAPHS**



Photo 1: Delivery truck unloading bay, located to the east of the reception building. Looking towards to the north.

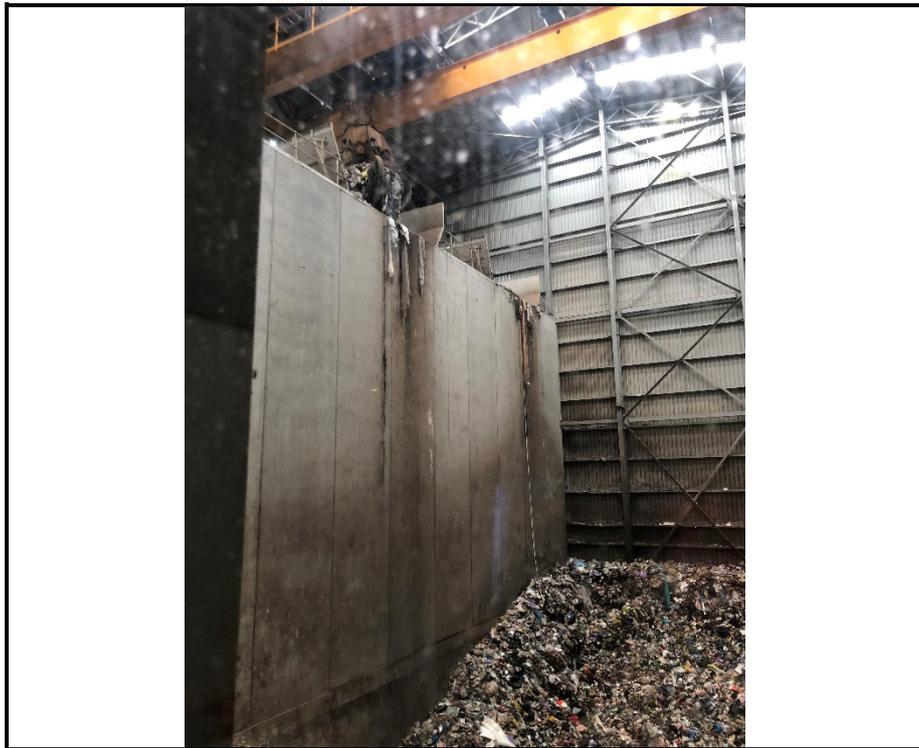


Photo 2: Inside the Reception building within the eastern portion of the site, looking towards the north.

Title: Independent Environmental Audit	Approved:	Project-No.:	Date:
Site: Woodlawn MBT Facility	VS	318000689	28/03/19
Client: Veolia Environmental Services Pty Ltd			



Photo 3: Water cart travelling along southern boundary of the Facility towards the refining building and ducting to biofilter for odour control. Looking towards the west.



Photo 4: Biofilter located along the southern boundary adjacent to the administration building. Looking towards the west.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318000689	Date: 28/03/19
Site: Woodlawn MBT Facility			
Client: Veolia Environmental Services Pty Ltd			



Photo 5: BRS drum located within the central portion of the Facility, looking towards the north.



Photo 6: Collection bin for metals separated during the BRS drum process. Located along the southern side of the refining building, looking towards the north.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318000689	Date: 28/03/19
Site: Woodlawn MBT Facility			
Client: Veolia Environmental Services Pty Ltd			



Photo 7: Fermentation building and compost storage, located in the north-western portion of the Facility. Looking towards the west.



Photo 8: Leachate aeration pond, located in the north-western portion of the MBT facility. Looking towards the north.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318000689	Date: 28/03/19
Site: Woodlawn MBT Facility			
Client: Veolia Environmental Services Pty Ltd			



Photo 9: Refuelling station, located north-eastern corner of the MBT facility, looking towards the east.

Title: Independent Environmental Audit	Approved:	Project-No.:	Date:
Site: Woodlawn MBT Facility	VS	318000689	28/03/19
Client: Veolia Environmental Services Pty Ltd			