

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

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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**
Ref: **318000689**

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CONTENTS

1.	EXECUTIVE SUMMARY	1
2.	INTRODUCTION	2
2.1	Background	2
2.2	Audit Team	2
2.3	Audit Objectives	2
2.4	Audit Scope	2
2.5	Audit Period	3
3.	AUDIT METHODOLOGY	4
3.1	Selection and Endorsement of Audit Team	4
3.2	Independent Audit Scope Development	4
3.3	Compliance Evaluation	4
3.4	Site Inspection and Interviews	4
3.5	Consultation	4
3.6	Compliance Status Descriptors	4
4.	AUDIT FINDINGS	6
4.1	Approval and Document List	6
4.2	Compliance Performance	9
4.3	Summary of Agency Notices, Orders, Penalty Notices or Prosecutions	9
4.4	Previous Audit Recommendations	9
4.5	EMP, Sub-plans and Post Approval Documents	9
4.6	EMS	9
4.7	Environmental Performance	9
4.8	Complaints	10
4.9	Incidents	10
4.10	Actual Verses Predicted Environmental Impacts	10
4.11	Site Inspection	10
4.12	Site interviews	10
4.13	Previous Annual Review or Compliance Report Recommendations	10
4.14	Improvement Opportunities	10
4.15	Key Strengths	11
5.	RECOMMENDATIONS AND OPPORTUNITIES FOR IMPROVEMENT	12
5.1	Recommendations in Relation to Opportunities for Improvement	12
6.	CONCLUSIONS	13

APPENDICES

Appendix A
Independent Audit Tables

Appendix B
Planning Secretary Audit Team Agreement

Appendix C
Independent Audit Declaration Form

Appendix D
Site Inspection Photographs

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)
- 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

APPENDIX B PLANNING SECRETARY AUDIT TEAM AGREEMENT

APPENDIX C INDEPENDENT AUDIT DECLARATION FORM

INDEPENDENT AUDIT DECLARATION FORM

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

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