

Annual Environmental Management Report - Camellia Materials Recycling Facility 2019-2020



Quality Information

Prepared by



.....
 Sara Maddison
 Operations Project
 Manager
BE(Civ), BE(Env)

Reviewed by



.....
 Ramona Bachu
 Environmental Compliance
 Manager
*BSc, GradDip, MEEM, DipPM,
 MEIANZ*

Authorised by



.....
 Promit Biswas
 Technical Manager,
 Landfill, Technical &
 Performance
*BE(Civ)(Hons), Post Grad
 DipPM*

Address:

Veolia Australia and New Zealand
 Corner Unwin and Shirley streets,
 Rosehill, NSW 2142

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Terms and Definitions

Term	Definition
AEMR	Annual Environmental Management Report
BMS	Veolia's Business Management Systems
DA	Development Application
DPIE	Department of Planning, Industry and the Environment
EIS	Environmental Impact Statement
EP&A	Environmental Planning and Assessment (Act and Regulations)
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
IEA	Independent Environmental Audit
The Consent	Development Consent SSD 4964
Veolia	Veolia Australia and New Zealand

Executive Summary

This Annual Environmental Management Report (AEMR) 2019-2020 is the third report prepared to detail the environmental performance of activities undertaken at 37 Grand Avenue, Camellia, NSW (the Site). The AEMR covers the period of 7 July 2019 to 6 July 2020 (2019-2020 reporting period).

The Department of Planning, Industry and the Environment (DPIE) (formerly the Department of Planning and Environment) granted Development Consent SSD 4964 (the Consent) on 6 July 2016 for the development of a Material Recycling Facility (MRF) at the Site. The Consent comprises conditions (the Consent Conditions) stipulating requirements for construction and operational phases. Veolia Australia and New Zealand (Veolia) has prepared this AEMR in accordance with Consent Condition 11, as well as relevant legislative requirements.

A description of the activities that were carried out at the Site in this reporting period is provided in the AEMR, including capping of the site and installation of stormwater infrastructure which commenced 21 January 2020 and was completed 16 June 2020. The AEMR also includes a review of monitoring results, in relation to the environmental performance of the Site against relevant performance measures and statutory requirements, as well as records of any complaints.

An outstanding action from the previous AEMR, related to findings of the Independent Environmental Audit (IEA) undertaken in October 2018, has been resolved. No non-compliances with the Consent were identified in this reporting period.

Section 1 - Introduction

1.1 Site Background

The Site is located at 37 Grand Avenue, Camellia, NSW. Refer to Appendix A for Site Location Plan. Veolia is currently leasing the Site to render it suitable for commercial / industrial land use, with the intention to develop a Materials Recycling Facility (MRF).

The proposed development involves the construction and operation of a facility to house a multi stage processing system in a new, enclosed building, including a combination of equipment designed to separate incoming waste and extract recyclable material for transfer to secondary markets. The MRF will be capable of processing up to 200,000 tonnes per annum of general solid (non-putrescible) waste received from the commercial and industrial sector. There is also the potential to allow for a refuse derived fuel stream for energy recovery.

The development of MRF comprises of two stages:

1. Stage 1 - Preloading of the Site
2. Stage 2 - Construction of the MRF

Stage 1 – Preloading of the site with engineered fill material was completed in the previous reporting period during which consolidation of the site was achieved. Following this, further advice on additional works was sought for the ongoing management of the preloading fill material prior to the commencement of Stage 2 - Construction of the MRF.

Stage 1A covers the additional Stage 1 works not originally anticipated to be undertaken under the approved Stage 1 works. The Stage 1A works involved levelling, grading and placing a two coat seal over the site to improve water management.

The Consent dictates the construction and operational environmental performance requirements of the Site. As a result a Construction and Environmental Management Plan (CEMP) was prepared to describe controls for construction activities, which was approved by DPIE on 23 May 2017. The table below summarises the development activities undertaken during the reporting period associated with the Consent, in accordance with the CEMP.

Table 1.1 – Development activities carried out during the reporting period

Works	Approval Authority	Works Completed	Status
Stage 1A - Additional earthworks and sealing of the site to	DPIE (SSD 4964)	<ul style="list-style-type: none"> • Levelling and grading the preload fill material 	Completed June 2020

improve stormwater management		<ul style="list-style-type: none"> Installation of stormwater collection pipework, pits and drainage swales 	
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Prior to the commencement of Stage 1A works (July 2019 - January 2020) and following the completion of Stage 1A works (June - July 2020) no works were being undertaken on the site. During this period, Veolia personnel were responsible for ensuring environmental controls and mitigation measures were effectively maintained on-site.

JK Williams Pty Ltd (JKW) was the Principal Contractor (the Contractor) engaged by Veolia, responsible for carrying out the Stage 1A works. Between January - June 2020 the Contractor was responsible for implementing Veolia’s management systems for construction activities as detailed in the CEMP for the Site for ensuring effective environmental controls and mitigation measures.

To validate this, checklists, registers and forms were completed as records of site inspections. These documents provided a means to evaluate and verify compliance with the relevant regulatory requirements and the contractual environmental requirements.

No non-compliances were identified during site inspections in this reporting period. In the event a non-compliance is identified during site inspections or through monitoring results, an investigation would be carried out to determine the cause and to ascertain the necessary corrective actions.

1.2 Legislative Requirements

The main legislative instruments governing the environmental performance and activities undertaken at the Site include the EP&A Act regulated by the DPIE, and the *Protection of the Environment Operations Act 1997* (the POEO Act) regulated by the NSW Environment Protection Authority (EPA), as well as their respective associated regulations. Those relevant to the preparation of this AEMR are provided in Table 1.2 below.

In addition to the Consent, Environment Protection Licence 4806, issued by the EPA, also regulates the construction activities conducted at the Site.

Table 1.2 - Consent Condition for the preparation of this AEMR

Relevant Condition	Requirement
<i>PART C - ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</i>	
<i>Annual Review</i>	
<p>C11</p>	<p>Within 1 year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development. This review must:</p> <ul style="list-style-type: none"> (a) describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year; (b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of the results against the: <ul style="list-style-type: none"> i. the relevant statutory requirements, limits or performance measures/criteria; ii. requirements of any plan or program required under this consent; iii. the monitoring results of previous years; and iv. the relevant predictions in the EIS; (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the Development; (e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.

1.3 Responsibilities

- During Stage 1A constructions works environmental site inspections were undertaken and/or supervised by the Contractor in accordance with the CEMP
- Environmental inspections were also were undertaken by Veolia NSW Solid Waste Treatment technical support personnel – Mary Wong (Graduate Environmental Engineer) and Sara Maddison (Operations Project Manager)

Section 2 - Environmental Monitoring & Management

2.1 Monitoring Requirements

The following sections detail the monitoring undertaken throughout the reporting period in accordance with the requirements of the Consent.

Environmental Monitoring Program within the Construction Environmental Management Plan (CEMP) for Stage 1A construction activities provides details on all monitoring requirements for the Consent to measure and assess the effectiveness of on-site environmental management measures implemented during these works.

Table 2.1 Construction Monitoring Requirements

Condition Ref	Type of Monitoring	Frequency	Commentary
Part B, Condition B18	Traffic Spot Monitoring	As required	Ongoing basis
CEMP	Visual Dust Monitoring	Weekly or as required	Ongoing basis
Part B, Condition B24	Noise Monitoring	At the commencement of the project, followed by as required	Background noise monitoring completed July 2017 No complaints related to noise received to trigger additional monitoring
Part B, Condition B26	Vibration Monitoring	As required	Vibration to not exceed the continuous or impulsive vibration criteria in EPA's <i>Assessing Vibration: A Technical Guideline</i> (February 2006) at residential receivers.

			No complaints related to vibration received to trigger additional monitoring
Water Management Plan (Consult.In, 2018) (WMP, appended to the CEMP)	Inspection of Water Management System	Weekly during construction activities on site	Ongoing basis
WMP	Inspection of Sediment and Erosion Controls	Monthly and following all rainfall of greater than 29.5mm over a five-day period	Ongoing basis
WMP	Stormwater Quality Monitoring	During event of temporary basin overflow and as required	No basin overflow events occurred to trigger monitoring

2.1.1 Meteorology

Monitoring meteorological data during this reporting period provided an understanding of the ambient air quality and rainfall conditions at the Site, which was utilised to manage environmental performance, as well as investigate potential impact to nearby sensitive receivers.

Meteorological data is downloaded from the public weather station situated at the Bureau of Meteorology (BoM) Parramatta North (Masons Drive) (Station ID: 066124), recorded at 15 minute intervals. During the reporting period, meteorological conditions such as wind speed, wind direction and rainfall were monitored on an ongoing basis and/or in the event a noise or dust complaint was received.

A summary of daily wind speeds and wind directions at 9am at the nearby BoM weather station is presented in Figure 2.1 and Figure 2.2. During the reporting period, the 9am prevailing wind directions were westerly and north-westerly and the wind speeds were most frequently between 1 – 10 m/s.

Figure 2.1 Distribution of 9AM wind direction data during the reporting period

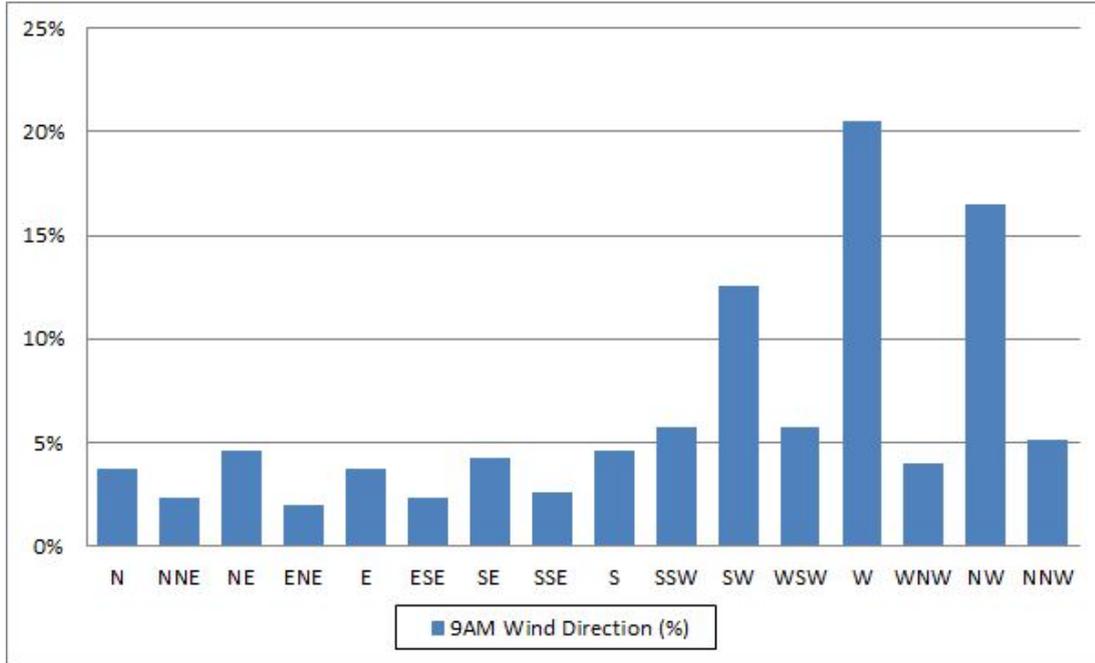
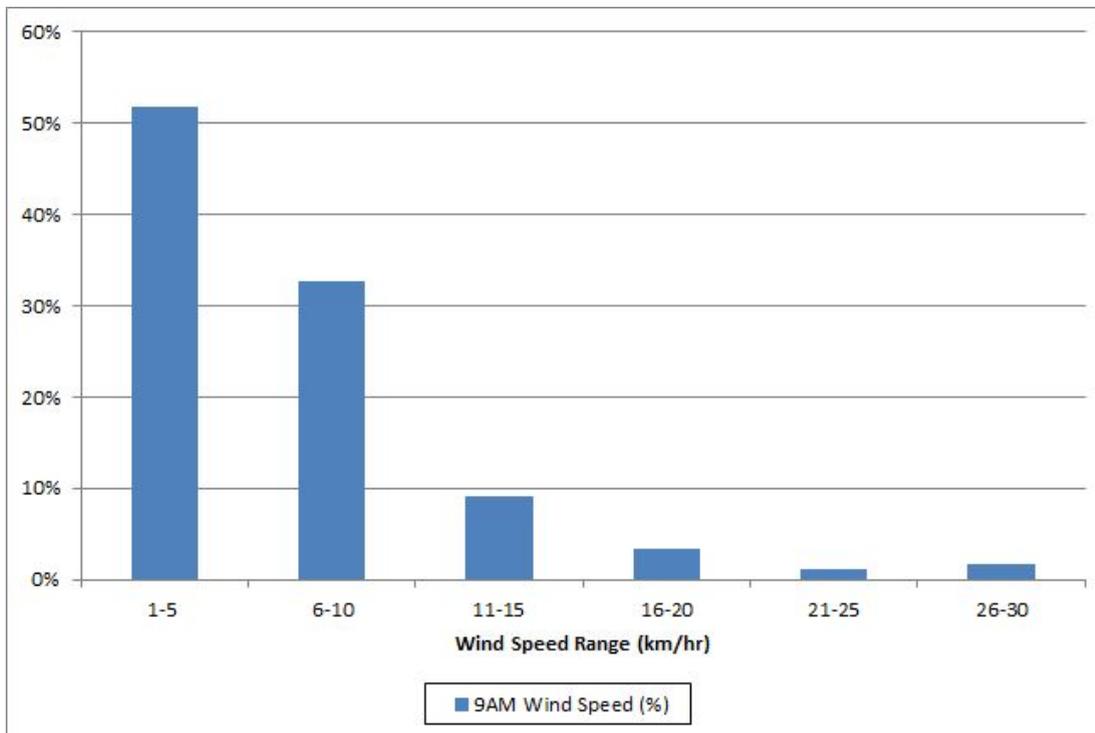


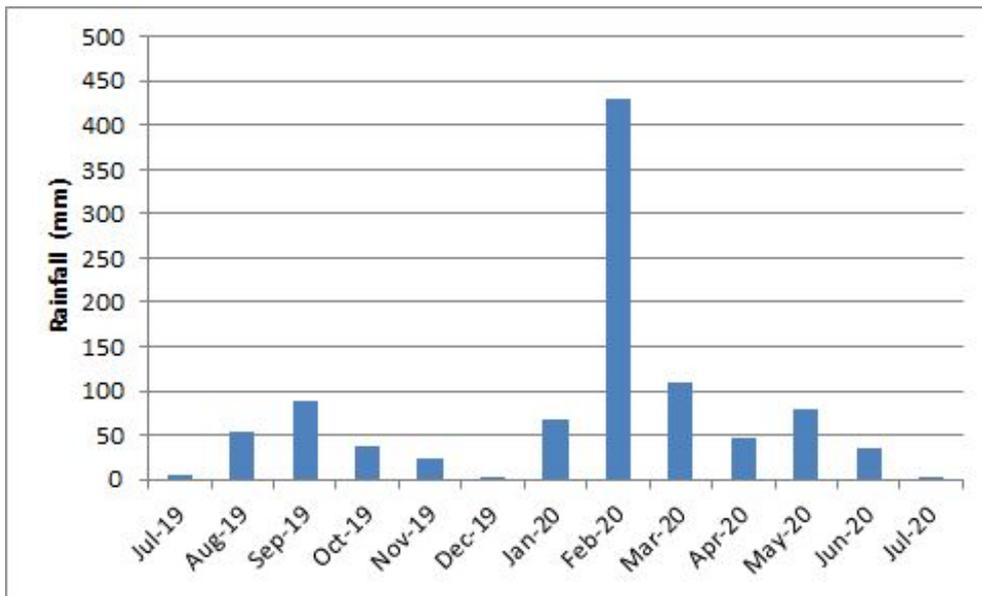
Figure 2.2 Distribution of 9AM wind speed data during the reporting period



Ongoing rainfall data was monitored to supplement stormwater system operation and discharge, as well as for general housekeeping management such as inspection and maintenance of sediment and erosion control measures.

A summary of rainfall data at the Site during the reporting period is presented in Figure 2.3. Overall, the average rainfall for the Site during the reporting period was approximately 75.4mm per month. Significant rainfall (401mm in total) was observed during the first two weeks of February 2020.

Figure 2.3 Monthly rainfall data during the reporting period



2.2 Air Quality

Air quality monitoring in accordance with the Consent, was carried out as required to determine whether activities conducted at the Site impacted ambient air quality. Stage 1A activities were undertaken on-site over a period of five months, the remainder of the time no activity occurred. Further details regarding air quality monitoring and management practices undertaken at the Site are provided in the following sections.

2.2.1 Dust

The Environmental Impact Statement (CH2MHILL, 2013) predicted air quality impacts during the construction phase of the Site that activities, associated with levelling and grading imported fill material on the site, would have the potential to generate dust emissions. However it was expected that any dust generated during Stage 1A works would be localised to the site and managed accordingly.

During the previous reporting period, immediately following the placement of the preload fill material, a geofabric layer (bidim) was keyed onto the surface of the material. Until Stage 1A works commenced in January 2020, the bidim layer continued to be maintained on site presenting minimal opportunities for dust generation and dispersal.

During Stage 1A site leveling and grading activities, the Contractor was responsible for maintaining dust mitigation measures to minimise airborne dust generation and subsequent impact on neighbouring sites and workers. The following dust control measures were implemented on site during the reporting period:

- Water spraying using water trucks to minimise any airborne dust generation
- To avoid tracking of dirt, sand and other materials, all loaded construction vehicles leaving the Site are cleaned using a cattle grid
- Cleaning of dust and debris from public paved roads using a street sweeper
- Ground disturbance and exposed surfaces were minimised and occurred progressively to prevent generation of dust
- Maintaining height limits on stockpiled materials to 2 metres.

Daily site inspection checklists were used during the construction activities to assess the effectiveness of control measures.

Following the completion of Stage 1A works, and the site being sealed, dust generation is no longer a potential issue. Therefore daily site inspections were reduced to monthly checks.

No dust complaints were received during the reporting period.

2.2.2 Exhaust Emissions

Exhaust emissions, such as diesel exhaust from construction traffic and machinery, had the potential to temporarily impact on local air quality during Stage 1A activities. In the EIS, it was predicted that, given the relatively low number of vehicles and machinery expected during the Stage 1A works compared to existing traffic at the Camellia industrial area, exhaust emissions were unlikely to cause significant impacts on the local and regional air quality.

As per the CEMP, in order to minimise exhaust emissions during construction activities, the following air quality mitigation measures were in place during the reporting period;

- Vehicle and machinery exhaust systems were serviced and maintained by the Contractor
- The Contractor was responsible for carrying out inspections of machinery through daily pre-start checklists.

No complaints relating to exhaust emissions were received during the reporting period.

2.3 Noise and Vibration

During Stage 1A works, construction and traffic noise and vibration activities had the potential to generate nuisance noise and vibration emissions but were managed in accordance with the following mitigation measures.

2.3.1 Noise

As part of the Environmental Impact Statement (EIS), a noise assessment was conducted by Bridges Acoustics Pty Ltd to assess the predicted construction and traffic noise levels generated as a result of the preloading works. Given the industrial nature of the area, the neighbouring properties were considered not likely to be sensitive to environmental noise. The nearest sensitive noise receivers were the residences located in and around John Street, Rydalmere (approximately 230 m from the Site). Based on the assessment no exceedance in noise impact above background levels was anticipated to occur as a result of construction noise emissions at the Site.

As per the CEMP, in order to minimise noise impacts of construction activities, the following noise and vibration mitigation measures were in place during the reporting period;

- Site speed limit of 20 km/hr enforced by the Contractor to avoid unnecessary noise due to fast engine speeds
- Machinery were fitted with squashed duck reversing alarms as opposed to reversing beepers. In addition all machinery and vehicles were fitted with flashing lights.
- The Contractor carried out maintenance and servicing of machinery to ensure all machines used on the Site were maintained in working order, with particular emphasis on exhaust silencers, covers on engines and transmissions, and squeaking or rattling components.

- Daily pre-start checks were performed on all machinery to ensure that the plant are in good order for operation.
- Construction activities were restricted to the construction hours specified below in Table 2.1.

Table 2.1 - Construction Hours of Operation

Activity	Day	Hours
Construction	Monday - Friday	7:00am-6:00pm
	Saturday	8:00am-1:00pm
	Sunday & Public Holidays	Nil

In July 2017, prior to the commencement of Stage 1 Preloading works, SLR Consulting were engaged to conduct an unattended background noise survey at the two closest noise sensitive receivers. In the event a noise complaint is received, this data would assist in the investigation of potential noise impacts from construction activities. In the event of levels detected above the set limits for noise, a review of construction activities, plant and equipment would be triggered to resolve the issue.

There were no noise complaints received from either industrial or residential neighbours during the 2019-2020 reporting period therefore no additional noise monitoring was undertaken.

2.3.2 Vibration

The Construction Vibration criterion was developed in accordance with the *Assessing Vibration: Technical Guideline* (NSW EPA, 2006) at residential receivers which outlines that the continuous or impulsive vibration not to exceed the criteria in Table 2.2.

Table 2.2 - Vibration Performance Criteria

Location	Assessment Period	Preferred Values		Maximum Values	
		Z axis	X and y axis	Z axis	X and y axis
Continuous vibration					
Critical areas ²	Day-or night-time	0.0050	0.0036	0.010	0.0072

Residences	Daytime	0.010	0.0071	0.020	0.014
	Night-time	0.007	0.005	0.014	0.010
Impulsive vibration					
Critical areas²	Day-or night-time	0.0050	0.0036	0.010	0.0072
Residences	Daytime	0.30	0.21	0.60	0.42
	Night-time	0.10	0.071	0.20	0.14

Note: Daytime is 7.00am to 10:00pm and night-time is 10:00pm to 7:00am.

Ground vibration caused by compaction was assessed in the EIS to be negligible and to pose no potential impact on sensitive receivers. No vibration complaints were received from either industrial or residential neighbours during the reporting period to trigger additional vibration monitoring.

2.4 Surface Water

Prior to the commencement of Stage 1A works, site runoff was managed through a temporary water management system, as per the WMP (Consult.In, 2018). The front portion of the site was bunded to hold stormwater as a temporary basin, which was then pumped to the Site's outlet and discharged into Parramatta River.

The temporary water management system also included the use of erosion and sediment controls to minimise sediment runoff into waterways. These controls comprised sandbags, sediment fencing around the base of the slopes and emplacement of a geotextile layer (bidim) across the entire site over the engineered fill.

The efficacy of these measures was assessed against the performance criteria given in the table below.

Table 2.3 - Surface Water Performance Criteria for the Temporary Water Management System

Monitoring Point	Parameter	Performance Criteria	Reference
Temporary basin sump	Total Suspended Solids	50 mg/L	WMP

As per the WMP, in the event the temporary sediment basin at the southern end of the site is found to be overflowing, two consecutive samples of the basin outlet water must be collected to

verify performance of erosion and sediment control measures against the performance criteria in Table 2.3. During the reporting period, no basin overflow events occurred therefore no water samples were required to be collected from the basin. Site inspections carried out during the significant rainfall in February 2020 (refer to Section 2.1.1), found that the temporary basin was not overflowing and all stormwater control measures were working effectively.

During Stage 1A works, the Contractor was responsible for managing their temporary water management system (including sediment and erosion controls) and undertaking inspections of the system which were documented in site inspection checklists.

Stage 1A works included the installation of a new stormwater system and grading of the site to work predominantly as overland and channel flow. Following the completion of these works in June 2020, visual monitoring of the key components of the new stormwater management system have been done on a routine basis, including inspections of the cap and the new stormwater pits and swales.

No issues related to stormwater management were noted during this reporting period.

2.5 Traffic

A traffic impact statement (TIS) was undertaken as part of the EIS to assess the potential impact of the Site on surrounding traffic during construction. It was found that variations in the daily construction vehicle generation for each construction activity conducted during preloading of the Site (as per Table 2.4) would cause temporary noise impacts and have the potential to cause minor congestion/traffic disruptions in the surrounding areas.

Table 2.4 - Anticipated truck movements during Stage 1 Activities

Construction Activities	Anticipated truck movements per day	Indicative Timing
Preloading of the Site	60 truck movements/ day	over a 3-week period
Settlement Period	N/A	over a period of approximately 12 months
Removal of the excess material	5-10 truck movements/ day	over a period of 1 week

During the reporting period a total of 96 heavy vehicle movements occurred between 21 January - 26 March 2020, when excess preload material was being removed from the Site. During this period, a number of mitigation measures were implemented at the Site to manage potential traffic impacts as detailed in the CEMP including;

- Daily 2 way radio communication with drivers at the entry to update drivers, with any recent changes to procedures and to manage traffic
- A Traffic Management Plan (TMP) was implemented on-site during construction works. The TMP was continually updated in line with the tipping plan, which was communicated through Site inductions and toolbox talks.
- On-site parking used for construction traffic parking and deliveries away from the immediate construction zone in order to avoid congestion

The implemented traffic control measures on site assisted with the effective management of traffic flow. No traffic congestion or impacts to locality were noted and no complaints were received during the reporting period.

2.6 Soil

In accordance with Condition B15 of the Consent, all fill material used for preloading of the site was classified as Virgin Excavated Natural Material (VENM).

The imported fill material was sourced from WestConnex stage 1B tunnel spoil and applied under the WestConnex Stage 1B Tunnel Spoil Exemption 2016 issued by the EPA.

During the reporting period, as part of the regrading of the site, 10,609 tonnes of excess cut material classified under the Recovered Aggregate Order 2014 (EPA 2014c) was removed from the site for use as subgrade replacement material for road construction purposes.

As per the CEMP, the Contractor was responsible for implementing soil and erosion control measures during Stage 1A works. No measures were identified to be breached during this reporting period.

2.8 Heritage

No excavation works were conducted therefore items of indigenous heritage were not encountered during the reporting period.

2.9 Pest and Vermin noxious weeds

During the reporting period, visual inspections for pests and vermin were undertaken at the Site. For this AEMR period, no pest and vermin management issues were reported.

Weed management was undertaken in the reporting period as part of the site maintenance works including clearing of vegetation to minimise weed re-establishment and invasions.

2.10 Complaints

Following the receipt of a complaint:

1. Any complaints, queries and issues received regarding noise, dust or other general community disturbances are documented individually in the Site's Complaints Register
2. Meteorological wind data is downloaded from the BoM website
3. All complaints are investigated and details recorded and actioned as per Veolia's incident management processes
4. The Site Manager or nominee communicates any corrective actions taken on the site with the complainant

No complaints were received by the Site during this reporting period.

Section 3 - Environmental Performance

The environmental performance of the Site is assessed through the results of environmental monitoring, internal inspections, as well as external and internal environmental audits.

3.1 Previous Findings and Corrective Actions

In the previous AEMR no non-compliances against the Consent were reported, however there was an outstanding action from the findings of the IEA, as per Table 3.1 below, which was resolved in this reporting period.

Table 3.1 - Outstanding action from previous reporting period

Relevant Condition	Non-compliance	Corrective Action	Team Responsible	Status
EPL 4806 Condition O4.1	Recommendation to update the Pollution Incident Response Management Plan (PIRMP) to meet all the requirements under the legislation.	<p>As a corrective action to this non compliance, Veolia had committed to reviewing the CEMP and Flooding Emergency Response Plan (ERP) to ensure consistent referencing with the Pollution Incident Response Management Manual and PIRMP were addressed.</p> <p>In the previous reporting period, the Flooding ERP was under development in consultation with Parramatta Council.</p>	NSW SHEQ team	<p>Complete</p> <p>The Site Emergency Response Plan (ERP) was updated to incorporate the amended PIRMP requirements and Contractor's ERP during the Stage 1A works and the approved Flooding ERP.</p>

		In this reporting period, the updated PIRMP Guidelines were published (EPA, 2020)		
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3.2 Current Findings

No non-compliances have been identified against the Consent Conditions during the 2019-2020 reporting period. Management systems and environmental performance of the development are considered to be adequate for this stage of development.

3.3 Future Planned Works

In accordance with the CEMP, Veolia will continue to conduct monitoring and maintenance activities over the next year.

3.4 Conclusion

A review of the environmental performance of the Site during the last reporting period determined the Site was managed in accordance with the Consent and CEMP. Veolia will continue to monitor and assess the Site's environmental performance through to the next reporting period, as well as report on the progress of closing out of corrective actions.

References

1. CH2M HILL (2013) Camellia Recycling Centre: Environmental Assessment. CH2M HILL Australia Pty Ltd. February 2013.
2. Consult.In (2016) Camellia MRF - Water Management Plan. Consult.In Pty Ltd. December 2016
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6. Veolia (2016). Construction and Environmental Management Plan (CEMP) – Preloading Stage. Veolia Australia and New Zealand. November 2016.
7. Veolia (2019) Camellia Materials Recycling Facility - Annual Environmental Management Report (AEMR). Veolia Australia and New Zealand. September 2019.

Appendices

Appendix A - Site Plan



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P

F

NRG Automotive Repairs

Concrete Recyclers

Veolia Environmental Services

SAMI Bitumen Technologies

Hymix Concrete

Antoine St

Dean St

Park Rd

Charles Quay-Parazette

Charles Quay-Parazette

Charles Quay-Parazette

Grand Ave

Grand Ave