

**VEOLIA AUSTRALIA AND NEW  
ZEALAND**  
**2020 INDEPENDENT AUDIT  
REPORT - CLYDE WASTE  
TRANSFER TERMINAL**





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TRANSFER TERMINAL**

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CLYDE WASTE TRANSFER TERMINAL  
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## EXECUTIVE SUMMARY

Epic Environmental Pty Ltd (Epic) was engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Clyde waste transfer terminal (CTT) (the site). This document outlines the method, findings and recommendations of the 2020 IEA. The IEA was undertaken between 20 November to 27 November 2020. The IEA scope included activities undertaken at the site during the period January 2019 to November 2020.

The purpose of the IEA was to address the requirements of Condition 60 of the development consent (DA 205-08-01) and assess overall compliance/conformance and environmental performance of the site. In accordance with Condition 60 b) of the Development Consent, the audit team was approved by the Director-General.

The audit criteria which the site was assessed against for this IEA included:

- Findings of the 2019 IEA (Jackson Environment and Planning Pty Ltd, 2019);
- Conditions of DA 205-08-01;
- Conditions of EPL 11763; and
- Requirements within the CTT draft Operational Environmental Management Plan (the OEMP) and associated sub-plans.

The IEA comprised of an opening meeting, audit interviews, site inspection and closing meeting. A suite of evidence and material was provided by Veolia to verify the findings of the IEA.

### IEA Findings

Overall, Veolia achieved **98%** compliance/conformance against the audit criteria for the 2020 IEA. A total of 254 applicable aspects were audited across the criteria with a total of three non-compliances and no non-conformances identified.

In addition to the high level of compliance / conformance demonstrated by Veolia, Epic identified multiple positive observations during the IEA. These included the high level of training provided to staff and drivers, comprehensive management plans being developed, effective management of the environmental risks on-site and no non-compliances with the EPL. The key non-compliances identified during the IEA include:

- The traffic management plan did not include all the required content of the development consent;
- The emergency response plan did not include all the required content of the development consent; and

- A trust fund as required by the development consent, for the functioning of the Community Consultative Committee had not been established or maintained by Veolia.

### **IEA Recommendations**

Based on the audit findings a variety of recommendations and actions have been provided in this IEA report. The key recommendations to address the non-compliances included:

- Prepare and lodge a modification to the development consent that removes the requirement for Veolia to enforce punitive measures to non-conforming customers. As part of the modification Veolia should consider a revised condition that requires Veolia to provide further training to offending drivers and remove access authorisation for drivers that are repeat offenders;
- Update the emergency response plan to include an annual cost estimate for implementation of the plan; and
- Prepare and lodge a modification to the development consent that removes the requirement for Veolia to establish and maintain a trust fund for a Community Consultative Committee.

All recommendations should be considered and if appropriate implemented by Veolia. Where an alternative action to the provided recommendation is adopted this should be documented and assessed at the subsequent IEA.

# 1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) has been engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Clyde Transfer Terminal (CTT). This document outlines the method and findings of the IEA of the CTT. The IEA was undertaken between 20 November to 27 November 2020. This document outlines the method, findings and recommendations of the 2020 IEA undertaken at the CTT.

## 1.1 BACKGROUND

Veolia operates the CTT on the 322A Parramatta Road, Auburn, New South Wales (the site). The site operates under Development Consent (DA 205-08-01) and Environment Protection Licence (EPL 11763). The site is approved to receive up to 600,000 tonnes of mixed household and commercial waste per annum, which is transported by rail to Veolia's site at Woodlawn, near Tarago NSW, for treatment and resource recovery.

The site consists of the following:

- Transfer Building including waste compactors, leachate containment and odour controls;
- Bitumen hardstand area for container storage;
- Rail siding for loading/unloading containers to/from trains;
- Office and Amenities;
- Entrance/Exit connecting to Parramatta Road;
- Weighbridge Office and Weighbridge; and
- A stormwater oil/silt separator and retention pond.

## 1.2 AUDIT TEAM

The audit team members are listed in **Table 1**. In accordance with Condition 60 b) of the Development Consent, the audit team has been approved by the Director-General (refer **Appendix A**). The auditors confirm their independence and the signed Independent Audit Declaration Form has been provided in **Appendix B**.

**Table 1: Audit Team**

Person	Role	Years' Experience	Qualifications
Romin Nejad	Lead Auditor	16	Lead Auditor (Exemplar Global, No. 115361), BEng (Env), GCert Env Mgmt, GCert Carbon Mgmt, MBA
Gary Bagwell	Technical Expert / Audit Inspector	25+	BEng (Chemical), Grad.Mgmt, LLM (Env)

### **1.3 AUDIT OBJECTIVE**

As per Condition 60 of the development consent for the site, an IEA is required to be undertaken every year to independently verify compliance of environmental obligations at the site.

The key objective of the IEA was to:

- Assess whether the site is operated in compliance with the approval conditions listed under the:
  - Development consent (DA 205-08-01).
  - Environment protection licence (EPL 11763);
- Assess whether the site is being operated in accordance with current practice and standards;
- Assess the overall environmental performance of the site and effects on the surrounding environment and sensitive receptors;
- Review the adequacy and implementation of management plans developed in accordance with the approval conditions; and
- Provide recommendations for the overall improvement of environmental performance of the site.

### **1.4 AUDIT PERIOD**

The audit period is between January 2019 to November 2020. Any activity or evidence that was not within this audit period was not included in the scope of the audit.

### **1.5 AUDIT SCOPE**

The audit scope included activities undertaken during the audit period at the site in relation to the operation of the terminal with respect to the development consent, EPL, (draft) Operational Environmental Management Plan (OEMP) and relevant environmental sub-plans.

## 2 AUDIT METHOD

### 2.1 METHOD DEVELOPMENT

The IEA method was developed with reference to:

- *Independent Audit Post Approval Requirements (DPI&E, 2020)*; and
- *ISO 19011 Guidelines for Auditing Management Systems*.

### 2.2 AUDIT PROGRAM

The IEA was undertaken in accordance with the program provided in **Table 2**.

**Table 2: Proposed Program for the IEA**

Proposed Time	Proposed Date	Task Description	Locations
<b>Pre-Audit Preparations</b>			
17:00	4/11/20	Preparation and provision of Audit Plan to Veolia	Email
17:00	9/11/20	Provision of management plans required for the audit	Email
09:00 – 17:00	11/11/20	Undertake a preliminary document review	Epic Offices
09:00 – 17:00	13/11/20	Develop the audit tools	Epic Offices
<b>Auditing Phase</b>			
11:00 – 11:30	20/11/20	Opening Meeting	Teleconference
08:00 – 14:00	23/11/20	Audit interviews	Teleconference
08:00 – 12:30	24/11/20	Interview with Site Manager	Teleconference
08:00 – 11:00	26/11/20	Site inspection	Site
11:00 – 11:30	27/11/20	Closing Meeting	Teleconference
<b>Audit Reporting</b>			
17:00	11/12/20	Provision of additional evidence not obtained during the audit.	Email
09:00 – 17:00	14/12/20 – 17/12/20	Prepare the draft audit report	Epic Offices
17:00	17/12/20	Issue the draft audit report to Veolia	Email
17:00	8/01/21	Veolia provides comments on draft audit report	Email
17:00	19/01/21	Issue the final audit report to Veolia	Email

### 2.3 PRE-AUDIT CONSULTATION

Upon engagement the audit team held a kick-off meeting with Veolia to discuss the IEA process, expectations and detail information requirements prior to undertaking the IEA. Following the kick-off meeting, Veolia issued letters detailing the proposed scope of the IEA and inviting feedback from the following stakeholders:

- Department of Planning, Industry and Environment (DPI&E), providing the Director General's agreement with the Independent Auditors, (response provided in **Appendix A**);
- Environment Protection Authority (EPA) (response provided in **Appendix C**); and
- Cumberland City Council (CCC) (response provided in **Appendix D**).

## 2.4 AUDIT TOOLS

The following audit tools were used during the IEA. These tools assisted in defining the scope of the IEA, captured any issues identified during the IEA and allowed discussion of potential recommendations on how these items can be rectified. The tools included:

- Audit plan (**Appendix E**)
- Opening meeting agenda and minutes;
- Closing meeting agenda and minutes; and
- Independent audit table (**Appendix F**) and interview questions.

## 2.5 AUDIT CRITERIA

The audit criteria are the requirements against which the site was assessed. The audit criteria for the site included:

- Findings of the 2019 IEA (Jackson Environment and Planning Pty Ltd, 2019);
- Conditions of DA 205-08-01;
- Conditions of EPL 11763; and
- Requirements within the Clyde Waste Transfer Terminal draft Operational Environmental Management Plan (the OEMP) and the following sub-plans<sup>1</sup>:
  - Environmental monitoring program.
  - Waste management plan.
  - Odour management plan.
  - Dust management plan.
  - Traffic management plan.
  - Vermin and pest control plan.
  - Stormwater management plan.
  - Site contamination management plan.
  - Noise management plan.
  - Emergency response plan.

## 2.6 COMPLIANCE / CONFORMANCE STATUS DEFINITIONS

The compliance / conformance assessment ratings used in the audit assessment is outlined in **Table 3**.

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<sup>1</sup> At the time of audit, Veolia had prepared the draft OEMP and associated sub-plans and this document had not been reviewed or approved by DPI&E. Veolia intend to implement the draft OEMP and associated sub-plans in the near future and supersede the existing approved OEMP. Therefore to provide the greatest value of the IEA to Veolia it was determined the audit criteria should verify conformance with the draft OEMP and sub-plans.

**Table 3: Audit Status Definitions**

<b>Audit Status</b>	<b>Abbreviation</b>	<b>Definition</b>
Conformant <sup>1</sup> /compliant <sup>2</sup>	C	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or management plan requirement have been complied/conformed with within the scope of the audit.
Non conformant / compliant	NC	The auditor has determined that one or more specific elements of the conditions or management plan requirements have not been complied/conformed with within the scope of the audit.
Not Triggered	NT	A condition or requirement has an activation or timing trigger that has not been met during the defined audit period (may be a retrospective or future requirement), therefore an assessment of compliance/conformance is not relevant.

<sup>1</sup> **Conformant** applies to non-legislative requirement listed in a procedure, standard or management plan.

<sup>2</sup> **Compliant** applies to legislative requirement listed in legislation or, condition of a license / consent.

## 2.7 AUDIT INTERVIEWS

A number of key staff were interviewed during the IEA, including:

- Site Manager – Rod Jones;
- Environmental Team – Ramona Bachu, Anae Ressos and/or Mary Wong;
- Operations Project Management & Environmental Management Representatives – Sara Maddison; and
- Leading Hands Sioi Mataele.

Interviews were undertaken via teleconference.

## 2.8 SITE INSPECTIONS

A site inspection was undertaken following the audit interviews to visually verify those aspects that could not be confirmed during the audit interviews. Weather on the day of site inspection sunny, with a low of 17.5 °C and a top of 31.7 °C (BOM, 2020). During the seven days prior to the site inspection Parramatta weather station recorded 8 mm of rain. The audit team were escorted by Veolia representatives during the site inspection. The audit team were provided unrestricted access to the site to verify compliance / conformance.

## 2.9 AUDIT EVIDENCE

A comprehensive suite of evidence and material was provided by Veolia to verify the findings of the IEA. The list of material reviewed during the IEA included:

- The OEMP, including the following draft sub-plans:
  - Waste Management Plan for CTT.
  - Odour Management Plan for CTT.
  - Dust Management Plan for CTT.

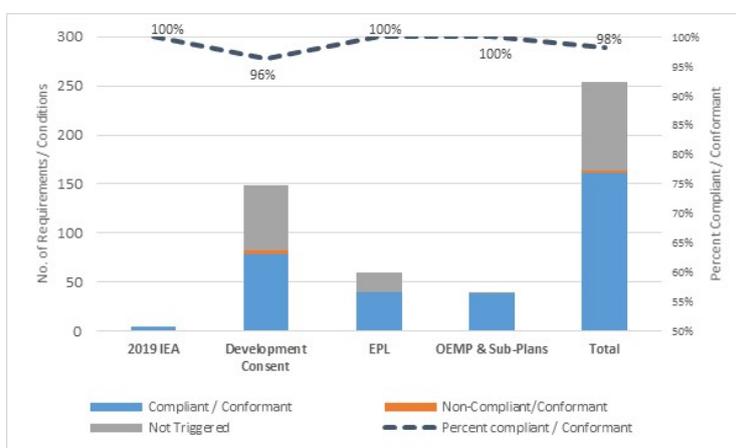
- Traffic Management Plan for CTT.
- Vermin and Pest Control Plan for CTT.
- Stormwater Management Plan for CTT.
- Site Contamination Management Plan for CTT.
- Noise Management Plan – Rail Operations for CTT.
- Noise Management Plan – Terminal Operations for CTT.
- Environmental Monitoring Program for CTT.
- Emergency Response Plan for CTT (ERP);
- 2019 & 2020 Annual Environmental Management Reports (AEMRs);
- Clyde Odour Audit – Reports (XXXIV, XXXV & XXXIII);
- 2019 & 2020 Annual Truck Noise Measurements;
- Clyde Independent Audit Final Report 2018 & 2019;
- 2019 & 2020 Annual Returns;
- Waste Records for 2020;
- Weekly and Monthly Inspection Records for 2020;
- DPI&E approval of the 2008 OEMP;
- Site induction, driver induction and training records;
- Environmental incident records for the period 2019 – 2020;
- Details of Development Consent Modifications – Mod 1 – Mod 5;
- 2020 extraction fan maintenance records;
- Veolia Waste Classification Flowchart;
- The following work instructions and procedures:
  - Weighbridge Operators Work Instruction.
  - Waste Shed Dust Suppression System.
  - Exceedances Notification Work Instruction.
  - Compactor Pit Operations.
  - Control of Non-Conforming Waste Procedure;
- DPI&E approval of the Environmental Management Representative;
- Position Description of the Environmental Management Representative; and
- Evidence of ERP testing in 2020.

## 3 AUDIT FINDINGS

### 3.1 OVERALL COMPLIANCE/CONFORMANCE RESULTS

A total of 254 individual requirements / conditions were audited across the audit criteria, with 90 requirements / conditions determined to be not triggered at the time of the IEA. Of the applicable requirements and conditions, Veolia demonstrated compliance / conformance against **98%** the audit criteria. This equated to a total of three audited requirements / conditions that were identified as NC.

The overall IEA results have been shown in **Figure 1**.



**Figure 1: Overall IEA Results**

The subsequent sections will provide a summary of the findings with the complete independent audit table provided in **Appendix F**.

#### 3.1.1 Positive Observations

A number of positive observations were noted during the IEA including:

- A comprehensive and simple driver induction program has been developed and implemented at the site;
- The draft OEMP and associated sub-plans were comprehensive, well structured and easy to implement;
- Site personnel received a high level of training and induction to ensure compliance;
- No areas of concern were observed during the site inspection. Notably:
  - No odour was noted outside the terminal building.
  - Extensive measures were noted to minimise the attraction of Ibis (Australian White Ibis) on the site (see Plate 1 & 2, **Appendix G**).
  - External areas of the site were clean and no evidence of litter was observed (see Plate 3 & 4, **Appendix G**).
  - Stormwater systems were well maintained (see Plate 5, **Appendix G**).

- A street sweeper was available for deployment (see Plate 6, **Appendix G**)
  - The waste containers were fitted with activated carbon filters (see Plate 7, **Appendix G**).
  - Facilities were provided for the collection of non-conforming waste (see Plate 8, **Appendix G**); and
- A high level of environmental governance was demonstrated with the 100% compliance with the conditions of the EPL demonstrated.

### 3.2 SUMMARY OF AGENCY NOTICES, ORDERS, PENALTY NOTICES OR PROSECUTIONS

No agency notices, orders, penalty notices and prosecutions were noted for the site during the audit period.

### 3.3 AUDIT FINDINGS

#### 3.3.1 2019 IEA Findings

The 2019 IEA identified one NC and four opportunities for improvement. During the 2020 IEA, the NC was closed out through improvement to the driver induction, traffic surveys and working with RMS to improve the intersection. All four opportunities for improvement identified during the 2019 IEA, had been considered and actioned by Veolia.

#### 3.3.2 Development Consent

Veolia was found to be 96% compliant with the conditions of the DA 205-08-01. Notable observations of compliance included:

- Monitoring (including noise, odour and waste monitoring) required by the conditions of consent were up to date and complete;
- Monitoring reports, IEA reports, AEMRs and the OEMP were available on the Veolia website for CTT;
- The required waste records were maintained and up to date;
- Stormwater management on the site was undertaken in accordance with the conditions; and
- Comprehensive training was provided to personnel and drivers.

A total of three non-compliances were identified during the IEA, including:

- **Condition 50:** The TMP was reviewed and largely addressed the consent condition, with the exception of Veolia not having:
  - Implemented an enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached.

- Defined contracts with waste transporters that include conditions addressing entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances.
- Measures to minimise trucks and other heavy vehicles from entering or exiting the premises between the hours: 10pm and 5am Mondays to Saturdays; 10pm and 7am Sundays and public holidays;
- **Condition 126(c):** The Emergency Response Plan was reviewed as part of the IEA and the document largely addressed the requirements of the condition with the exception of an estimate of the cost of implementation; and
- **Condition 136:** The condition requires Veolia to establish and maintain a trust fund to facilitate the functioning of the Community Consultative Committee. During the audit it was determined Veolia had not established such a fund. Whilst it is understood a community consultative committee has not been able to be established, the requirement for payment to a trust fund as required by this condition has not been removed. Therefore Veolia has not demonstrated reasonable compliance with this condition.

Recommendations to address the non-compliances and opportunities for improvement have been provided in **Section 4**.

### 3.3.3 Environmental Protection Licence

Veolia was found to be 100% compliant with the conditions of the EPL 11763. Notable observations of compliance included:

- No evidence of unauthorised environmental harm was observed during the audit;
- Systems to ensure only conformant waste is received and sent to Veolia's Woodlawn facility were observed;
- Comprehensive training was provided to personnel and drivers;
- The site inspection and maintenance records demonstrated plant and equipment is being maintained in a proper and efficient manner;
- The emergency response planning has been undertaken in accordance with the EPL; and
- Monitoring (including noise, odour and waste monitoring) required by the conditions of consent were up to date and complete.

Based on the findings of the IEA no further recommendations are provided for improving management of Veolia's obligations under EPL 11763.

### **3.3.4 OEMP & Associated Sub-Plans**

To verify implementation of the draft OEMP and associated sub-plans, the IEA verified conformance with 40 selected requirements within these documents. Veolia was found to be 100% conformant with the selected requirements of the OEMP and associated sub-plans.

Notable observations of conformance included:

- The documented training records are in accordance with the training required in the OEMP and associated sub-plans;
- Incident investigation records provided reflect the incident investigation requirements in the OEMP;
- On-site waste management on site are undertaken in accordance with the documented waste management plan;
- The site inspection and maintenance records demonstrated plant and equipment is being maintained in a proper and efficient manner;
- On-site waste management on site are undertaken in accordance with the documented waste management plan; and
- Monitoring records were complete and up to date.

### **3.4 ENVIRONMENTAL PERFORMANCE**

Monitoring records were observed for the audit period and demonstrated a high level of environmental performance across the site.

### **3.5 COMPLAINTS**

No complaints were received during the audit period.

### **3.6 INCIDENTS**

A single environmental incident was noted during the audit period. The incident involved a customer truck being cleaned in an unauthorised location and a mess being left following the cleaning. No off-site environmental harm occurred as a result of the incident.

Under Veolia's incident investigation process such an incident is defined as minor and only required a short incident report to be completed. The incident records were observed and were appropriate to the severity of the incident.

## 4 RECOMMENDATIONS

### 4.1 NON-COMPLIANCES / CONFORMANCES

A total of three NCs were identified during the IEA. Recommended actions to the address each of these matters has been provided in **Table 4**. Veolia should consider these recommendations and implement as appropriate or propose alternative actions to address identified NCs.

**Table 4: Recommendations to Resolve Identified NCs**

Unique Identification	Relevant Condition / Section	Recommendation
CTT-DA-NC-01	Development Consent Condition 50	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to enforce punitive measures to non-conforming customers. As part of the modification Veolia should consider a revised condition that requires Veolia to provide further training with offending drivers and remove access authorisation for drivers that are repeat offenders.
CTT-DA-NC-02	Development Consent Condition 126 (c)	Update the emergency response plan to include an annual cost estimate for implementation of the plan.
CTT-DA-NC-03	Development Consent Condition 136	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to establish and maintain a trust fund for a Community Consultative Committee that could not be established.

### 4.2 OPPORTUNITIES FOR IMPROVEMENT

A total of nine opportunities for improvement were identified during the IEA. These opportunities for improvement have been listed as recommendation in **Table 5**. Veolia should consider and implement recommendations these, as appropriate, to improve the overall environmental performance of the site.

**Table 5: Recommendations for Opportunities for Improvements**

Unique Identification	Relevant Condition / Section	Recommendation
CTT-DA-OFI-01	Development Consent Condition 57	Write to the DPI&E and seek written approval for the monitoring consultant (the Odour Unit) as required under condition 57.
CTT-DA-OFI-02	Development Consent Condition 87	Prepare and lodge a modification to the development consent that removes the requirement for monitoring of the forced ventilation system in accordance with the EPL. As EPL 11763 does not require monitoring of the forced ventilation system, condition 87 should be updated to remove any ambiguity.
CTT-DA-OFI-03	Development Consent Condition 113	Develop and implement a process to undertake annual verifications of driver induction training completion. The process could be in the form of annual checks of all drivers against training records provided by the customer.
CTT-DA-OFI-04	Development Consent Condition 114	Prepare and lodge a modification to the development consent that replaces the requirement for Veolia to undertake training with rail operators and change this to a requirement for Veolia to verify the existing training programs provided by the rail operators are suitable to minimise the risk of nuisance being caused to neighbouring properties.

Unique Identification	Relevant Condition / Section	Recommendation
CTT-DA-OFI-05	Development Consent Condition 130, 131 & 132	As the previous Auburn Council has now amalgamated into the Cumberland City Council, Veolia should re-engage with the current Council with regards to Condition 130, 131 & 132. Specifically, Veolia should identify whether there is any interest from the Council to collaborate on a Duck Creek Riparian Zone improvement project.
CTT-OEMP-OFI-01	s4.3.2 of the OEMP	A list of interested parties (i.e., stakeholders) contact details should be prepared for the site. At a minimum this should include: <ul style="list-style-type: none"> <li>▪ All neighboring properties;</li> <li>▪ Relevant local community members;</li> <li>▪ Respondents to the development consent modifications; and</li> <li>▪ The Local Councilor.</li> </ul> These parties should be invited to any community open day.
CTT-OEMP-OFI-02	s5.1.2 of the OEMP	Remove any reference to Aurburn Council across the OEMP and associated sub-plans.
CTT-OEMP-OFI-03	s5.2 of the OEMP	Prepare and implement a formal management review process in accordance with s5.2 of the OEMP.
CTT-OEMP-OFI-04	s4.1 of the Dust Management Plan	Update s4.1 of the Dust Management Plan to remove the requirement for certain adverse weather conditions to trigger a risk assessment. Existing mitigation measures are considered suitable for management of dust risks from the site.

## 5 CONCLUSION

This document outlines the method, findings and recommendations of the 2020 IEA undertaken by Epic at the CTT. The IEA was undertaken in accordance with Condition 60 & 61 of the Development Consent (DA 205-08-01). The IEA was conducted to:

- Assess the level of compliance against the conditions of approval;
- Assess whether current practices and standards are being implemented;
- Evaluation the overall environmental performance of the site;
- Assess the adequacy and implementation of management plans; and
- Identify recommendations for the overall improvement of environmental performance.

The IEA was undertaken between 20 November and 27 November 2020 and captured evidence for the period January 2019 to November 2020. The audit criteria used for the IEA, including the findings of the 2019 IEA, Conditions of DA 205-08-01, Conditions of EPL 11763, the OEMP, and the associated sub-plans. A total of 254 individual requirements / conditions were audited across the audit criteria, with 90 determined to not be triggered at the time of IEA and three non-compliances/conformances. Veolia demonstrated compliance / conformance against **98%** the audit criteria.

In addition to the high level of compliance / conformance demonstrated by Veolia, Epic identified multiple positive observations during the IEA. These included the high level of training provided to staff and drivers, comprehensive management plans being developed, effective management of the environmental risks on-site and no non-compliances with the EPL. The key non-compliances identified during the IEA include:

- The traffic management plan did not include all the required content of the development consent;
- The emergency response plan did not include all the required content of the development consent; and
- A trust fund as required by the development consent for the functioning of the Community Consultative Committee had not been established or maintained by Veolia.

Recommendations to assist Veolia in addressing the findings of this IEA have been provided. All recommendations should be considered and if appropriate implemented by Veolia. Where an alternative action to the provided recommendation is adopted this should be documented and assessed at the subsequent IEA.

Finally, the audit team would like to thank all of the audit participants for their time, assistance and cooperation in undertaking this audit.

## 6 REFERENCES

Department of Planning, Industry and the Environment, 2020, *Requirement 2, Independent Audit - Post Approval Requirements*, Sydney, New South Wales

International Organization for Standardization, 2018, *ISO 19011:2018 Guidelines For Auditing Management Systems*

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Jackson Environment and Planning Pty Ltd, 2019, *2019 Independent Environmental Audit Veolia Environmental Services Australia Clyde Transfer Terminal*, Sydney New South Wales

## 7 LIMITATIONS AND DISCLAIMER

Epic Environmental Pty Ltd (Epic) has prepared the following report for the exclusive benefit of Veolia Australia and New Zealand Pty Ltd (Client) and for the singular purpose of detailing the findings of the 2020 Independent Environmental Audit of the Clyde Transfer Terminal located in Clyde NSW. All interpretations, findings or recommendations outlined in this report should be read and relied upon only in the context of the report.

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- b. has not undertaken any verification to the accuracy or reliability included in this information (with the exception where such verification formed part of the scope of works);
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# **APPENDIX A – PLANNING SECRETARY AUDIT TEAM AGREEMENT**



Sara Maddison  
Operations Project Manager, Solid Waste Treatment  
Veolia Australia & New Zealand  
Cnr Unwin & Shirley Streets,  
**ROSEHILL NSW 2142**

21/10/2020

Dear Madam,

**Agreement of Independent Auditors  
Clyde Waste Transfer Terminal (DA 205-08-01)**

I refer to your request (DA205-08-01-PA-10) for the Secretary's approval of suitably qualified persons to prepare an Independent Environmental Audit (IEA) of the operations at the Clyde Waste Transfer Terminal.

The Department has reviewed the nominations and information you have provided, and is satisfied that these experts are suitably qualified & experienced. Consequently, I can advise that the Secretary approves the appointment of the following audit team in accordance with Condition 60 of DA 205-08-01 (Consent) to prepare the IEA. The Secretary has agreed to the following audit team:

- Lead Auditor – Romin Nejad of Epic Environmental Pty Ltd (Epic); and
- Technical Reviewer – Gary Bagwell of Epic; and
- Audit Assistant – Todd O'Brien of Epic.

Please ensure this correspondence is appended to the IEA Report.

In terms of audit scope, the IEA must be prepared, undertaken and finalised in accordance with the requirements of Conditions 60 and 61 of the Consent. The Department acknowledges that the IEA will be undertaken in accordance with the *Independent Audit Post Approval Requirements* (Department 2020) (PARs), but the Department notes that it can only be carried out to the extent that it does not contradict Conditions 60 and 61 of the Consent. Failure to meet Consent requirements and the PARs may require revision and resubmission. The Department also acknowledges that the audit period has been revised to cover operations occurring from January 2019 to the date of the IEA which the Department understands to conclude on 20 November 2020.

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Senior Compliance Officer Hala Fua on 8837 6328.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Pope', written in a cursive style.

Julia Pope  
Team Leader Compliance - Metro  
Compliance

As nominee of the Planning Secretary



# **APPENDIX B – INDEPENDENT AUDITOR DECLARATION FORM**

## Memo

To: Veolia Australia & New Zealand	From: Romin Nejad	Attention: Planning Secretary
Project: Clyde Waste Transfer Terminal - Independent Environmental Audit		
Project No: SC200058.01	Date: 14 December 2020	
<b>Subject: Independent Audit Report Declaration</b>		

<b>Project Name</b>	<b>Clyde Waste Transfer Station – Independent Environmental Audit</b>
<b>Consent Number</b>	205-08-01
<b>Description of Project</b>	Waste Transfer Terminal - The terminal is licensed to accept general solid wastes (both putrescible and non-putrescible). These wastes are received in an enclosed building and compacted into custom modified shipping containers for transport by rail to Veolia's Woodlawn Bioreactor.
<b>Project Address</b>	322 Parramatta Road, Clyde, NSW 2124
<b>Proponent</b>	Veolia Australia and New Zealand
<b>Title of Audit</b>	Independent Environmental Audit
<b>Date</b>	14 December 2020

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:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. 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;
- vi. 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;
- vii. 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
- viii. 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)

<b>Name of Auditor</b>	Romin Nejad
<b>Role in IEA</b>	Lead Auditor
<b>Signature</b>	
<b>Qualification</b>	Lead Auditor (Exemplar Global, No. 115361), BEng (Env), Gcert Env Mgmt, Gcert Carbon Mgmt, MBA
<b>Company</b>	Epic Environmental Pty Ltd
<b>Company Address</b>	Suite 4.01, Miller Street, Pyrmont, NSW, 2009

<b>Name of Auditor</b>	Gary Bagwell
<b>Role in IEA</b>	Technical Expert / Audit Inspector
<b>Signature</b>	
<b>Qualification</b>	BEng (Chemical), Grad.Mgmt, LLM (Env)
<b>Company</b>	Epic Environmental Pty Ltd
<b>Company Address</b>	Suite 4.01, Miller Street, Pyrmont, NSW, 2009



## **APPENDIX C – EPA CONSULTATION RESPONSE**



DOC20/797544-1

Ms Sara Maddison  
Veolia Environmental Services (Australia) Pty Ltd  
Cnr Unwin and Shirley Streets  
ROSEHILL NSW 2142

Email: sara.maddison@veolia.com

15 October 2020

Dear Ms Maddison

**Independent Environmental Audit – Clyde Transfer Terminal – EPA comments**

I am writing to you about your request for comments from the Environment Protection Authority (**EPA**) as part of the Independent Environment Audit (**IEA**) for Veolia Environmental Services (Australia) Pty Ltd's (**Veolia**) Clyde Transfer Terminal required by Project Approval 205-08-01 issued by the Department of Planning, Industry and Environment.

Veolia holds Environment Protection Licence No. 11763 (the Licence) for the facility. As such, when Epic Environmental Pty Ltd (Epic) undertaken the IEA, all aspects of compliance with the Licence and relevant environmental legislation including the *Protection of the Environment Operations Act 1997* and its associated regulations should be considered.

Epic are able to find information about the Licence and any regulatory action taken by the EPA on our public register at <https://www.epa.nsw.gov.au/licensing-and-regulation/public-registers>. We note that Veolia have been cooperative and responsive in dealing with the EPA in relation to this facility when required.

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

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Trevor Wilson'.

**TREVOR WILSON**  
**Unit Head – Metro South Operations**  
**Regulatory Operations Metro**

**Phone** 131 555  
**Phone** +61 2 9995 5555  
(from outside NSW)

**TTY** 133 677  
**ABN** 43 692 285 758

Locked Bag 5022  
Parramatta  
NSW 2124 Australia

4 Parramatta Square  
12 Darcy St, Parramatta  
NSW 2150 Australia

[info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)  
[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)



## **APPENDIX D – CUMMBERLAND CITY COUNCIL CONSULTATION RESPONSE**

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**ATTN: General Manager RE: Clyde Transfer Terminal - Independent Environmental Audit**

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**Alicia Brogan** <Alicia.Brogan@cumberland.nsw.gov.au>  
To: "Maddison, Sara" <sara.maddison@veolia.com>  
Cc: "anae.ressos@veolia.com" <anae.ressos@veolia.com>

29 September 2020 at 08:46

Hi Sara,

Cumberland City Council has reviewed the details of the audit team and scope, and is satisfied with the content. We don't have any further comment to make at this time.

Kind Regards,

**ALICIA BROGAN**

TEAM LEADER ENVIRONMENTAL HEALTH

16 Memorial Avenue, PO Box 42 Merrylands NSW 2160

T +61 2 8757 9204

E [Alicia.Brogan@cumberland.nsw.gov.au](mailto:Alicia.Brogan@cumberland.nsw.gov.au)W [www.cumberland.nsw.gov.au](http://www.cumberland.nsw.gov.au)**From:** Maddison, Sara [mailto:[sara.maddison@veolia.com](mailto:sara.maddison@veolia.com)]**Sent:** Monday, 28 September 2020 11:57 AM**To:** Records Department <[council@cumberland.nsw.gov.au](mailto:council@cumberland.nsw.gov.au)>**Cc:** Anae Ressos <[anae.ressos@veolia.com](mailto:anae.ressos@veolia.com)>**Subject:** ATTN: General Manager RE: Clyde Transfer Terminal - Independent Environmental Audit

Good afternoon,

Veolia in accordance with our consent conditions are planning to undertake our annual Independent Environmental Audit (IEA) of the Waste Transfer Facility in Clyde, NSW. The IEA will be undertaken in accordance with Independent Audit Post Approval Requirements (DPIE, 2020), which states the proponent should seek feedback on the audit scope from relevant stakeholders.

Accordingly we have attached our recent correspondence detailing the audit team and scope to the Planning Secretary and invite Cumberland Council to provide comment before 15 October 2020.

Regards,

**Sara Maddison**  
**Operations Project Manager - NSW Resource Recovery**

Phone: +612 9841 2914 / Mob: +61 439 820 254  
Cnr Unwin & Shirley Streets / Rosehill / NSW 2142 Australia  
<http://www.veolia.com/anz/>

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## APPENDIX E – AUDIT PLAN



**VEOLIA AUSTRALIA AND NEW  
ZEALAND**

**2020 INDEPENDENT  
ENVIRONMENTAL AUDIT -  
AUDIT PLAN**





## VEOLIA AUSTRALIA AND NEW ZEALAND

### 2020 INDEPENDENT ENVIRONMENTAL AUDIT - AUDIT PLAN

4 NOVEMBER 2020

CLYDE WASTE TRANSFER TERMINAL  
**EPIC ENVIRONMENTAL PTY LTD**

Suite 4.01, 55 Miller Street,  
Pyrmont, NSW 2009

**Email:** [enquiries@epicenvironmental.com.au](mailto:enquiries@epicenvironmental.com.au)

[www.epicenvironmental.com.au](http://www.epicenvironmental.com.au)

**ABN:** 54 169 579 275

**ACN:** 169 579 275





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## Document History and Status

Revision	Date Issued	Approved By	Date Approved	Revision Type	Issued To
A	3/11/20	G.Bagwell	3/11/20	Final Draft	S Maddison

<b>Printed:</b>	3 November 2020
<b>Last saved:</b>	3 November 2020 01:38 PM
<b>File name:</b>	SC200058-ClydeIEA-AuditPlan
<b>Author:</b>	Romin Nejad
<b>Project manager:</b>	Romin Nejad
<b>Client:</b>	Veolia Australia and New Zealand
<b>Document Title:</b>	2020 Independent Environmental Audit - Audit Plan
<b>Document version:</b>	Final
<b>Project number:</b>	SC200058.01

# 1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) has been engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Clyde, waste transfer terminal (the site). This document provides a detailed audit plan to guide the execution and reporting of the 2020 IEA. The audit plan should be reviewed by Veolia and issued to relevant auditees prior to the execution of the audit.

## 1.1 PURPOSE

As per Condition 60 of the development consent (DA 205-08-01) for the site, an IEA is required to be undertaken every year to ensure ongoing compliance of environmental obligations at the site. This IEA has been undertaken to address Condition 60 and evaluate compliance with the development consent conditions.

## 1.2 SCOPE

The audit scope will include activities undertaken at the site, in relation to the operation of the waste transfer terminal.

### 1.1.1 Audit Period

The audit period will be between January 2019 to November 2020 with respect to the audit criteria. Any activity or evidence that is not within this audit period will not be included in the scope of the audit.

## 1.3 OBJECTIVES

The key objectives of this IEA are to:

- Assess whether the site is operated in compliance with the approval conditions listed under the:
  - Development consent (DA 205-08-01).
  - Environment protection licence (EPL 11763);
- Assess whether the site is being operated in accordance with current practice and standards, including (but not limited to):
  - Waste management.
  - Waste-water management and treatment.
  - Odour management.
  - Stormwater management.
  - Noise mitigation.
  - Hazardous chemical storage and handling;

- Assess the overall environmental performance of the site and effects on the surrounding environment and sensitive receptors;
- Review the adequacy and implementation of procedures and management plans developed in accordance with the approval conditions; and
- Provide recommendations for the overall improvement of environmental performance of the site.

#### **1.4 AUDIT CRITERIA**

The audit criteria are the requirements which the site will be assessed against. The audit criteria for the site will be as follows:

- Conditions of the DA 205-08-01;
- Commitments within the Clyde Waste Transfer Terminal Environmental Management Plan (Operation Stage) (the EMP) and the following sub-plans:
  - Environmental monitoring program.
  - Waste management plan.
  - Odour management plan.
  - Dust management plan.
  - Traffic management plan.
  - Vermin and pest control plan.
  - Stormwater management plan.
  - Site contamination management plan.
  - Noise management plan.
  - Incident response plan; and
- Conditions of the EPL 11763.

## 2 AUDIT PLANNING

### 2.1 AUDIT TEAM

The audit team members have been provided in **Table 1**. In accordance with Condition 60 b) of the development consent, the audit team has been approved by the Director-General.

**Table 1: Audit Team**

Person	Role	Years' Experience	Qualifications
Romin Nejad	Lead Auditor	16	Lead Auditor (Exemplar Global, No. 115361), BEng (Env), GCert Env Mgmt, GCert Carbon Mgmt, MBA
Gary Bagwell	Technical Expert / Audit Inspector	25+	BEng (Chemical), Grad.Mgmt, LLM (Env)
Todd O'Brien	Auditing Assistant	4	BSc (Earth Science), LAA

### 2.2 VEOLIA STAFF PARTICIPATION REQUIREMENTS

#### 2.2.1 Opening Meeting

The opening meeting will be held via teleconference. The meeting will be facilitated by Romin Nejad (Epic) and should be attended by Gary Bagwell (Epic) and select Veolia personnel. The Veolia audit representative will be responsible for organising suitable time for undertaking the opening meeting.

#### 2.2.2 Interviews

A number of key staff will be required to be interviewed during the audit. The roles that may be interviewed for the site will include:

- Site Manager – Rod Jones;
- Environmental Team – Ramona Bachu, Anae Ressos and/or Mary Wong;
- Operations Project Management – Sara Maddison; and
- Leading Hands Sioi Mataele and/or Sydney Afeaki.

Interviews will be held via teleconference. A separate interview session will be scheduled with each interviewee. The Veolia audit representative will be responsible for organising suitable times for undertaking the audit interviews.

#### 2.2.3 Site Inspection

Following the audit interviews, a site inspection will be undertaken by Epic to visually verify compliance of certain conditions. It is understood a Veolia representative will liaise with relevant parties to obtain access and will be available to escort the audit team inspector around relevant areas of the site.

## 2.2.4 Closing Meeting

Within a week of the site inspection a closing meeting will be held via teleconference. The meeting will be facilitated by Romin Nejad (Epic) and should be attended by Gary Bagwell (Epic) and all Veolia interviewees. The Veolia audit representative will be responsible for organising suitable time for undertaking the closing meeting.

## 2.3 AUDIT PROGRAM

The proposed program to execute the audit will be as detailed in **Table 2**. Should the precise timeframes require amending, these can be accommodated through discussions with the Lead Auditor.

**Table 2: Proposed program for the audit**

Proposed Time	Proposed Date	Task Description	Locations	Who
<b>Pre-Audit Preparations</b>				
17:00	4/11/20	Preparation and provision of Audit Plan to Veolia	Email	Epic
17:00	9/11/20	Provision of management plans required for the audit	Email	Veolia
09:00 – 17:00	11/11/20	Undertake a preliminary document review	Epic Offices	Epic
09:00 – 17:00	13/11/20	Develop the audit tools	Epic Offices	Epic
<b>Auditing Phase</b>				
11:00 – 11:30	20/11/20	Opening Meeting	Teleconference	All
10:00 – 12:00	23/11/20	Interview with the Environment Team – Session 1	Teleconference	Epic & Veolia
13:00 – 14:00	23/11/20	Interview with Operations Project Manager	Teleconference	Epic & Veolia
14:00 – 16:00	23/11/20	Interview with the Environment Team – Session 2	Teleconference	Epic & Veolia
09:00 – 11:30	24/11/20	Interview with Site Manager	Teleconference	Epic & Veolia
13:00 – 14:00	24/11/20	Interview with Leading Hands	Teleconference	Epic & Veolia
09:00 – 16:00	26/11/20	Site inspection	Site	Epic & Veolia
11:00 – 11:30	27/11/20	Closing Meeting	Teleconference	All
<b>Audit Reporting</b>				
17:00	11/12/20	Provision of additional evidence not obtained during the audit.	Email	Veolia
09:00 – 17:00	14/12/20 – 19/12/20	Prepare the draft audit report	Epic Offices	Epic
-	21/12/20 – 03/01/20	Christmas Shutdown	-	-
17:00	08/01/20	Issue the draft audit report to Veolia	Email	Epic
17:00	15/01/20	Veolia provides comments on draft audit report	Email	Veolia
17:00	22/01/20	Issue the final audit report to Veolia	Email	Epic

## 2.4 COMMUNICATIONS PLAN

All communications regarding the planning of the audit, information requirements and audit execution will be either by email or phone to the Veolia audit representative.

## 3 AUDIT EXECUTION

The following audit methodology has been prepared with reference to the *Hazardous Industry Planning Advisory Paper No 5 Hazard Audit Guidelines* (January 2011).

### 3.1 AUDIT SCORING CRITERIA

The proposed compliance assessment rating to be used in the audit assessment are outlined in **Table 3** below.

**Table 3: Audit Scoring Criteria**

Audit Rating	Abbreviation	Definition
Conformant/compliant	C	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or management plan requirement have been complied/conformed with within the scope of the audit.
Non conformant/compliant	NC	The auditor has determined that one or more specific elements of the conditions or management plan requirements have not been complied/conformed with within the scope of the audit.
Not Triggerred	NT	A condition or requirement has an activation or timing trigger that has not been met during the defined audit period (may be a retrospective or future requirement), therefore an assessment of compliance/conformance is not relevant.

### 3.2 DEVELOP AUDIT TOOLS

The following audit tools will be utilised as part of the auditing program. These tools will assist in defining the scope of the audit and will capture any issues identified during the audit and allow discussion of potential recommendations on how these items can be rectified. The tools include:

- Opening meeting agenda and minutes;
- Closing meeting agenda and minutes; and
- Audit checklist and interview questions.

### 3.3 UNDERTAKING AUDIT

#### 3.3.1 Document Review

With regards to the operations undertaken at the site, documentation provided by Veolia prior to the audit, will be reviewed to determine preliminary findings. These findings will be clarified with the Veolia representatives during the audit interviews (if required).

### **3.3.2 Conduct an Opening Meeting**

An opening meeting will be conducted at the start of the audit. The opening meeting will:

- Introduce audit team;
- Confirm audit objectives, scope and criteria;
- Confirm communications channels;
- Outline the audit process and schedule;
- Identify and set expectations and requirements; and
- Address Health and Safety requirements and confidentiality.

Meeting minutes will be maintained and issued by Epic prior to the meeting.

### **3.3.3 Undertake Interviews**

Audit interviews will be undertaken by the lead auditor via teleconference. Questions delivered during the audit interviews will be based on condition or requirements applicable to the interviews area of responsibility. The Veolia representative will be responsible for scheduling the audit interviews with Veolia personnel.

If any items of non-compliance/conformance are identified during the interview they will be raised with Veolia and noted in the report. If an item which poses a safety risk or risk of environmental harm, the Veolia representative will be notified immediately.

### **3.3.4 Site Inspection**

A Veolia representative will be required to accompany the auditor or auditor's team member on the site inspection and identify all locations requiring auditing. Photographs and measurements (where appropriate) will be taken of items of interest or items requiring corrective action. If any items of non-compliance/conformance are identified, they will be raised with Veolia and noted in the report. If an item which poses a safety risk or risk of environmental harm, the Veolia representative will be notified immediately.

### **3.3.5 Conduct the Closing Meeting**

A closing meeting will be conducted with Veolia at the end of the audit. It will provide opportunity for Epic to outline positive and negative findings identified during the audit, Veolia to respond or clarify any findings, and the Epic to confirm the process following the audit. Meeting minutes will be maintained and issued by Epic following the meeting.

### 3.3.6 Audit Findings

The findings of the document review and interviews will be assessed and each finding assigned a rating within the audit checklist. Once complete the audit checklist will be provided (in excel format) to Veolia for a review and response to each finding. Each Veolia response to a non-compliance must also specify actions and the completion timing (dd/mm/yyyy) of such actions that are to be taken in response to each non-compliance. For each opportunity for improvement Veolia must provide reasons if they propose not to implement any measures or make any changes in response.

### 3.3.7 Independent Audit Report

Once the findings are assessed, rated and reviewed, an independent audit report will be prepared. The independent audit report will include:

- Introduction, including:
  - Background of the site.
  - The audit team.
  - The objectives of the audit.
  - The audit scope.
  - The audit period;
- Audit method, including
  - Development of audit scope was developed.
  - A summary of the audit process adopted to determine the compliance status and assess.
  - A list of the approvals and documents audited.
  - Details of personnel interviewed including their name and position title.
  - Details of site inspections undertaken.
  - A summary of the consultation undertaken prior to the audit.
  - Meanings of compliance status descriptors used, as set out in this document;
- Audit findings, including
  - A summary of the assessment of compliance.
  - Details of notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period.
  - Exception reporting of all non-compliances identified during the audit period.
  - A discussion of the status of actions arising from previous audits and the progress or outcomes of each action.
  - A discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate and implemented.
  - A discussion of other matters considered relevant by the auditor or the Department.

- A summary of complaints, and the adequacy of the response to, and management of complaints.
- Details of any incidents and the adequacy of the response to, and management of such incidents.
- An assessment of the compliance between actual and predicted impacts documented in environmental impact assessment.
- Evidence collected through site inspections undertaken during the audit.
- Any continual environmental management improvement opportunities identified as part of the audit.
- Positive observations identified by the auditor related to environmental management and performance;
- Recommendations and opportunities for improvement; and
- The following appendices:
  - Complete audit checklist including responses to findings.
  - A copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s).
  - Documentation detailing consultation with the Department, and other agencies or stakeholders.
  - Completed and signed Independent Audit Declaration Form.
  - Site inspection photographs.

## 4 GENERAL AUDIT MATTERS

### 4.1 LOGISTICAL ARRANGEMENTS FOR AUDIT

Transport to and from the site will be organised by Epic.

### 4.2 GENERAL AUDIT MATTERS

The audit inspector will have completed any Veolia health and safety inductions prior to undertaking the site inspection. The audit inspector will be escorted at all times by a Veolia representative.

In accordance with the site requirements, the following PPE will be worn by the auditor/ auditor team members:

- Long Pants;
- Long sleeve shirt;
- Steel cap work boots; and
- Protective eyewear.

### 4.3 MATTERS RELATED TO CONFIDENTIALITY

All information supplied, sighted and disclosed as part of this audit will remain confidential. Outcomes of the audit will be provided to Veolia.

### 4.4 AUDITORS CODE OF CONDUCT

All certified auditors have an obligation to improve the standing of their profession by observing the Exemplar Global Code of Conduct (Code). Compliance with the Code is a condition of certification and all auditors have signed an agreement to comply with the Code and are required to confirm that they have complied with the Code at each period of surveillance and re-certification.

#### Code of Conduct

- Auditors will act professionally, accurately and in an unbiased manner.
- Auditors will strive to increase the competency and prestige of the profession.
- Auditors will assist those in their employ or under their supervision in developing their professional competency.
- Auditors will not undertake any assignments that they are not competent to perform.
- Auditors will not represent conflicting or competing interests and will disclose to any client or employer any relationships that may influence their judgment.
- Auditors will not discuss or disclose any information relating to any assignment unless required by law or authorised in writing by the client and/or their employing organization.

- Auditors will not accept any inducement, commission, gift or any other benefit from client organizations, their employees or any interested party or knowingly allow colleagues to do so.
- Auditors will not intentionally communicate false or misleading information that may compromise the integrity of any assignment or the personnel certification process.
- Auditors will comply with Exemplar Global Certification Requirements, procedures and advisories which are relevant to their profession or certification.
- Auditors will not act in any way that would prejudice the reputation of Exemplar Global or the personnel certification process and will cooperate fully with an enquiry in the event of any alleged breach of this code.

#### 4.5 KEY CONTACTS

Table 4: Key Contacts

Name	Company and Position	Phone	Email
Sara Maddison	Veolia Representative	0439 820 254	<a href="mailto:sara.maddison@veolia.com">sara.maddison@veolia.com</a>
Romin Nejad	Epic, Environmental Lead Auditor	0403 116 766	<a href="mailto:rnejad@epicenvironmental.com.au">rnejad@epicenvironmental.com.au</a>
Gary Bagwell	Epic, Project Director and Audit Inspector	0499 001 131	<a href="mailto:gbagwell@epicenvironmental.com.au">gbagwell@epicenvironmental.com.au</a>

## 5 LIMITATIONS AND DISCLAIMER

Epic Environmental Pty Ltd (Epic) has prepared the following report for the exclusive benefit of Veolia (Client) and for the singular purpose of documenting an audit plan for the 2020 Clyde Waste Transfer Terminal Independent Environmental Audit. All interpretations, findings or recommendations outlined in this report should be read and relied upon only in the context of the report as a whole.

The following report cannot be relied upon for any other purpose, at any other location or for the benefit of any other person, without the prior written consent of Epic. Except with Epic's prior written consent, this report may not be:

- a. released to any other person, whether in whole or in part;
- b. used or relied upon by any other party; or
- c. filed with any Governmental agency or other person or quoted or referred to in any public document.

This report has been prepared based on information provided by the Client and other parties. In preparing this report Epic:

- a. presumed the accuracy of the information provided by the Client (including its representatives);
- b. has not undertaken any verification to the accuracy or reliability included in this information (with the exception where such verification formed part of the scope of works);
- c. has not undertaken any independent investigations or enquiries outside the scope of works with respect to information provided for this report; and
- d. provides no warranty or guarantee, expressed or implied, as to the accuracy or reliability of the information provided in this report.

In recognition of the limited use of this report, the Client agrees that, to the maximum extent permitted by law, Epic (including its representatives and related entities) is not liable for any losses, claims, costs, expenses, damages (whether pursuant to statute, in contract or tort, for negligence or otherwise) suffered or incurred by the Client or any third party as a result of the information, findings, opinions, estimates, recommendations and conclusions provided in this report.

Without limiting the above, Epic (including its representatives and related entities) is not liable, in any way whatsoever:

- a. for the use or reliance of this report for any purpose other than that for which it has been prepared;
- b. for any use or reliance upon this report by any person other than the Client;
- c. where another person has a different interpretation of the same information contained in the report;
- d. for any consequential or indirect losses, or for loss of profit or goodwill or any loss or corruption of any data, database or software.

If a section of this disclaimer is determined by any court or other competent authority to be unlawful and/or unenforceable, the other sections of this disclaimer continue in effect. Where further information becomes available, or additional assumptions need to be made, Epic reserves its right to amend this report, but is not obliged to do so.

## 6 REFERENCE

NSW Government 2020, *Independent Audit Post Approval Requirements* (Department of Planning, Industry and Environment)

*AS/NZS ISO 19011:2019 - Guidelines for auditing management systems.*



The Epic team provides a wide range of skills and experience on numerous environmental management issues, across a wide range of public, commercial and industrial projects. At Epic, we focus on the practical aspects of environmental planning, engineering and science, offering comprehensive services in:

- Strategic advice and project support;
- Contaminated site assessment, management and remediation;
- Asbestos assessment and advisory;
- Naturally Occurring Radiological Material assessment and management;
- Contaminated land auditing services (QLD –Contaminated Land Auditor; NSW – Contaminated Site Auditor);
- Statutory planning and impact assessment covering QLD, NSW and Commonwealth legislation;
- Environmental approvals and permitting – full array;
- Ecological (fauna, flora and habitat) site assessments;
- Site suitability assessments;
- Environmental offset assessments and development of management strategies;
- Waste auditing and management;
- Landfill design and management;
- Compliance and auditing;
- Erosion sediment control; and
- Hydrogeology.

## CONTACT

Sydney / Brisbane / Melbourne / Hobart

1800 779 363  
enquiries@epicenvironmental.com.au

[www.epicenvironmental.com.au](http://www.epicenvironmental.com.au)



## APPENDIX F – INDEPENDENT AUDIT TABLE



**CONFIDENTIAL**

**Veolia Australia & New Zealand  
Clyde Transfer Terminal –  
2020 Independent Environmental Audit – Audit Checklist**

**IEA Date:** 20 - 27 November 2020

**Auditor:**

Romin Nejad  
\_\_\_\_\_  
(Name)

*Romin Nejad*  
\_\_\_\_\_  
(Sign)

**Date** 18/01/2021

**Key for Compliance Assessment**

Audit Rating	Rating	Definition
Conformant/compliant	C	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or OEMP requirement have been complied/conformed with within the scope of the audit.
Non conformant/compliant	NC	The auditor has determined that one or more specific elements of the conditions or OEMP requirements have not been complied/conformed with within the scope of the audit.
Not Triggered	NT	A condition or requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance/conformance is not

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**Verification of 2019 IEA Findings**

Condition Ref	2019 Non-Compliance or Non-Conformance	2019 Audit Result	Verification of Closure	2020 Status
Consent Condition 119	A driver education program commenced in May 2018 and a pamphlet was cited to try and address this issue. Traffic survey on 11 and 12 March 2019 was done outside the audit period. Though over two days, 160 vehicles were observed turning right into the development. It is considered probable this non-compliance also occurred in 2018.	Non-Compliance	The following was documented during the audit: - The driver induction program was revised - Traffic surveys - Working with RMS to upgrade the turning into the site to permit the right hand turning.	C
None	It is recommended that the GPT and other stormwater assets on the site, which are maintained by external contractors, are put onto the maintenance register and a record of maintenance activities that have been performed is kept on the site to demonstrate these systems are being serviced.	Recommendation	The weekly site inspection checklist includes routine inspections of the GPT and stormwater infrastructure.	C
None	On the hardstand area within the container loading area, some hydraulic fluid was observed. This is regularly cleaned up through absorbent material. However, this should be checked more regularly to ensure no residual oil is left on the hardstand which can be transferred into stormwater during wet weather events.	Recommendation	The weekly site inspection checklist includes a general inspection of the yard for spill.	C
None	Some weed growth was observed on the southern side of the site adjacent to the rail corridor. Landscaping and maintenance activities of this area could help improve visual aesthetics and reduce the amount of exposed soil that could move into waterways during a large storm event.	Recommendation	Green options have been engaged as the landscaping maintenance contractor.	C
None	The western side of the site partly drains towards the stormwater detention pond, with the western corner clearly running off the site without any treatment. Although no waste is handled in this area, waste collection vehicles do drive over this part of the site, and it was recommended that a spill kit be placed on the Western corner to be available to clean up any minor spills that occur from waste collection vehicles.	Recommendation	A spill kit has been placed near the turning circle.	C

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Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
<b>General Conditions</b>					
1	<p>Development shall be carried out in accordance with:</p> <p>(a) DA No. 205-08-01;</p> <p>(b) the EIS prepared for the "Clyde Transfer Terminal" by Maunsell McIntyre Pty Ltd, dated 14 August 2001;</p> <p>(c) the Supplementary EIS prepared for the "Clyde Transfer Terminal" by Maunsell McIntyre Pty Ltd, dated 18 December 2001;</p> <p>(d) all additional information supplied by the Applicant or the Applicant's consultants or subconsultants to the Department or integrated approval bodies pertaining to the development, including:</p> <ul style="list-style-type: none"> <li>· Noise Mitigation Details provided to the EPA by Vipac Engineers &amp; Scientists Ltd by facsimile dated 15 February 2002;</li> <li>· Stormwater Outlet Design, dated 18 February 2002, provided to the Department by Maunsell Australia Pty Ltd;</li> <li>· Information on traffic, odour and noise, dated 9 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd;</li> <li>· Information on the construction EMP, stormwater drainage, site contamination, landscaping and rehabilitation of Duck River, and the property boundary, dated 10 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd;</li> <li>· Information on odour management, Duck River cycleway, and traffic management, dated 10 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd;</li> <li>· Information on the property boundary, dated 17 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd;</li> <li>· Information on modifications to pipeline, pipe outlet, scour protection works, detention basin, weighbridge and noise barrier, dated 19 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd;</li> <li>· Information on a proposed community consultative committee and possible community enhancement projects, dated 4 June 2002, provided to the Department by the Applicant;</li> <li>· Information on Parramatta Road plans and odour control procedure, dated 12 June 2002, provided to the Department by Maunsell Australia Pty Ltd; and</li> <li>· Information on odour management, dated 4 July 2002, provided to the Department by the Applicant</li> </ul> <p>(e) Modification application MOD-133-11-2006, accompanied by Statement of Environmental Effects Modification to the Terminal Building Forced Ventilation Sydney Clyde Waste Transfer Station, prepared by Environ and dated October 2006, the Odour Mitigation Study Clyde Waste Transfer Terminal Addendum to Final Report, prepared by the Odour Unit and dated July 2006, and Veolia Environmental Services' letter (and attachments) to the Department of Planning dated 15 February 2007,</p> <p>(f) modification application DA-205-08-01-MOD-2 and;</p> <p>(g) modification application DA-205-08-01-MOD-3 and accompanying letter dated 14 December 2009</p> <p>(h) modification application DA-05-08-01-MOD-4 and accompanying Environmental Assessment letter prepared by Veolia Environmental Services (Australia) Pty Ltd and dated 20 January 2014.</p>	C	The findings of this audit	The audit did not identify any major issues that would indicate non-compliance with this condition.	
2	<p>In the event of any inconsistency between;</p> <p>(a) the conditions of this consent and any document listed from condition 1(a) to 1(g) inclusive, the conditions of this consent shall prevail to the extent of the inconsistency; and</p> <p>(b) any document listed from condition 1(a) to 1(g) inclusive, the most recent document shall prevail to the extent of the inconsistency</p>	NT		This is a note only not auditable	
2A	<p>The Proponent shall comply with any reasonable requirements of the Planning Secretary arising from the Department's assessment of;</p> <p>(a) any reports, plans, programs, strategies or correspondence that are submitted in accordance with the conditions of this approval; and</p> <p>(b) the implementation of any actions or measures contained in these reports, plans, programs, strategies or correspondence.</p>	NT		Not relevant to the current audit period	
2B	<p>The Proponent shall prepare revisions of any strategies, plans or programs required under this approval if directed to do so by the Planning Secretary. Such revisions shall be prepared to the satisfaction of, and within a timeframe approved by, the Planning Secretary</p>	NT		This is a note only not auditable	
<b>Compliance</b>					

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
3	It shall be the ultimate responsibility of the Applicant to ensure compliance with these conditions	C	The findings of this audit	The audit did not identify any major issues that would indicate non-compliance with this condition.	
4	The conditions do not relieve the Applicant of the obligation to obtain all other approvals and licenses from all relevant authorities required under any other Act.	NT		This is a note only not auditable	
5	The Applicant shall comply or ensure compliance with all the requirements of the Director-General in respect of the implementation of any measures arising from these Conditions.	NT		This is a note only not auditable	
6	The Applicant must bring to the attention of the Director-General any matter that may require further investigation, or the issuing of instructions from the Director-General, to enable compliance with these Conditions. The Applicant shall comply or ensure compliance with any instruction issued by the Director-General to enable compliance with these Conditions.	C	None	Veolia advised there have been no issues identified by the Director General during the audit period.	
7	Where the results of any monitoring demonstrate an exceedance of a limit in this consent, the Applicant shall provide, within 30 days of the monitoring, the monitoring results to the Director-General and Auburn Council stating: (a) The reason for the exceedance; (b) Action taken to ensure the limit is not exceeded in the future; (c) Proposed action to ensure the limit is not exceeded in the future; (d) Timetable for implementing the proposed action in (c); and (e) Results of additional monitoring which has been conducted within 7 days of the action taken in (b) and (c) above, to demonstrate compliance with the limit.	C	Odour Audits, Odour Monitoring Results.	Based on a review of monitoring results no exceedances were identified during the audit period.	
<b>Waste Volumes</b>					
8	No waste shall be received at the development except waste to be transported by rail from Clyde to the Crisps Creek Intermodal Facility for disposal or treatment at Woodlawn.	C	Waste Records During Site Inspection	It was confirmed during the audit all waste received on the site is transported to Woodlawn. The exception to this is small quantities of non-conforming waste (gas bottles or large steel) which is sent to other facilities.	
9	Condition was deleted - Mod 4	NT		Condition has been removed	
10	The Proponent must ensure that no more than 600,000 tonnes per annum of waste is received at the development in any calendar year.	C	Annual Environmental Management Report - Clyde Transfer Terminal 2019	The waste records for 2019 show that 458,053 tonnes of material were processed at the facility.	
10A	The Proponent must ensure that no more than 500 tonnes of waste is present on the terminal floor at any one time, except under the limited circumstances detailed in the Operational Contingency Management Plan for the development, required by condition 54A and approved by the Development Secretary.	C	Site Inspection	At the time of inspection less than 500 T was observed on the terminal floor. Spot checks observed during the audit, demonstrated the terminal floor is consistently below 500T.	
<b>Fit and Proper Person</b>					
11	The applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the Protection of the Environment Operations Act 1997, having regard to the matters in s.83 of that Act.	C	Environment Protection Licence (EPL)	The EPA has issued an EPL thereby deeming the Licensee a fit and proper person to hold a licence.	
<b>Obligation to Prevent and Minimise Harm to the Environment</b>					
12	The Applicant is to take all practicable measures to prevent and minimise harm to the environment as a result of the Development.	C	Site inspection	No apparent unauthorised environmental harm was observed during the audit.	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
13	If at any time the Director-General is made aware of the occurrence of any impact from the project that poses serious environmental or amenity concerns, and is due to the failure of measures required by these Conditions or those measures identified in the documentation referred to in Condition 1 to ameliorate the impact, the Director-General may request the Applicant to cease the activities causing the impact.	C	None	Veolia advised that no issues have been identified by the DG during the audit period (unable to verify this during the audit).  Reviewed the online incident system (Sphere) and only a single minor incident was observed in the last 2 years.	
14	The Applicant may recommence the activities that were ceased, upon written advice by the Director-General that those concerns have been satisfactorily addressed.	NT		Not relevant to the current audit period	
<b>Date of Commencement</b>					
15	The date of commencement shall be the date that the Applicant determines to proceed with the development. The Applicant must provide the date of commencement in writing to the Director-General before commencement of the development.	NT		Not relevant to the current audit period	
<b>Pre-Construction Compliance Report</b>					
16	At least two weeks prior to commencement of construction (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General a report detailing the level of compliance with each Condition of this Consent that relates to pre-construction activities. The report shall include, but not necessarily be limited to: (a) the identification of each relevant Condition (b) the details of any study or report required by the relevant Conditions (c) the level of compliance with each relevant Condition (d) the reasons for any non-compliance (e) any action taken or proposed to make good any non-compliance, and (f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions	NT		Not relevant to the current audit period	
<b>Pre-Operation Compliance Report</b>					
17	At least one month prior to the receipt of uncontainerised waste at the premises (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General a report detailing the level of compliance with each Condition of this Consent that relates to pre-operation activities. The report shall include, but not necessarily be limited to: (a) identification of each relevant Condition (b) the details of any study or report required by the relevant Conditions (c) the level of compliance with each relevant Condition (d) the reasons for any non-compliance (e) any action taken or proposed to make good any non-compliance, and (f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions	NT		Not relevant to the current audit period	
<b>Dispute Resolution</b>					
18	The Applicant shall endeavour to resolve any dispute arising out of the implementation of these Conditions.	C	None	Veolia advised there have been no disputes related to the conditions during the audit period (unable to be verified during the audit).	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
19	For any unresolved dispute arising out of the implementation of these Conditions between the Applicant and a public authority, company or person (but excluding any dispute between the Applicant and its contractors and/or subcontractors engaged in the construction or operation of the development), in the first instance either party can refer the matter to the Director-General for resolution and, if not resolved, to the Minister. The Minister's determination of the disagreement shall be final and binding on all parties.	C	None	Veolia advised there have been no disputes related to the conditions during the audit period (unable to be verified during the audit).	
<b>Monitoring Records</b>					
20	The results of any monitoring required to be conducted by the Conditions of this Consent or a licence under the Protection of the Environment Operations Act 1997, in relation to the development, must be recorded and retained as specified in this Consent.	C	Environmental monitoring records including noise and odour	All monitoring records are maintained on Veolia's internal drive and were observed for 2019 - 2020.	
21	All records required to be kept by this Consent or an environment protection licence must be: (a) in a legible form, or in a form that can readily be reduced to a legible form; (b) kept for at least 4 years after the monitoring or event to which they relate took place; and (c) provided in a legible form to the Planning Secretary or any authorised officer of the EPA as soon as practicable after request.	C	Environmental monitoring records including noise and odour	Records for 2016 were observed for odour unit.	
22	The following records must be kept in respect of any samples required to be collected: (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.	C	Odour Audit 2019 - 2020  Annual Truck Noise Measurements	Odour monitoring and truck noise measurement reports addressed the consent condition.	
<b>GENERAL ENVIRONMENTAL MANAGEMENT</b>					
<b>Site Contamination</b>					
23	The applicant shall obtain an environmental report prepared by a site auditor accredited under the Contaminated Land Management Act 1997 to determine the nature and extent of contamination at the site and any investigation and/or remediation necessary before the land is suitable for commercial/industrial use. Prior to construction the Applicant shall obtain written endorsement from the site auditor for the following aspects of the Site Contamination Management Plan: (a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination (b) A plan to manage dust during the construction and operational stages in a manner that protects the health of on-site and off-site personnel.	NT		Not relevant to the current audit period	
24	Prior to completion of construction, any amelioration measures required to enable a site audit statement to be issued shall be implemented.	NT		Not relevant to the current audit period	
<b>Environmental Management Plan (EMP) (Construction Stage)</b>					
25	The Applicant shall prepare an EMP (Construction Stage) which is specific to the development.	NT		Not relevant to the current audit period	
25A	Prior to commencement of construction of the odour control system subject to MOD-133-11-2006, the Applicant shall prepare and obtain approval from the Planning Secretary for a Construction Environmental Management Plan (CEMP) specific to such works. The CEMP, to be submitted to the Planning Secretary and the EPA, shall include (but not necessarily be limited to) measures to be undertaken to minimise environmental impacts during construction with particular emphasis on measures for mitigating odour, dust, noise and traffic impacts on surrounding land uses. The CEMP shall provide details of how the environmental performance of the remediation works will be monitored, what actions will be taken to address identified adverse environmental impacts, and how the relevant requirements of conditions 26 to 38 shall be addressed. The CEMP shall reflect restrictions to construction hours as follows; Monday to Friday from 7am to 6pm, and Saturdays from 8am to 5pm, with no construction work on Sundays and Public Holidays. The CEMP shall be implemented during construction.	NT		Not relevant to the current audit period	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
26	The EMP (Construction Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.	NT		Not relevant to the current audit period	
27	The Applicant must not commence any works until the EMP (Construction Stage) has been completed and submitted to the Director-General.	NT		Not relevant to the current audit period	
28	The Applicant shall certify the EMP (Construction Stage) as being in accordance with the Conditions of Consent prior to submitting it to the Director-General.	NT		Not relevant to the current audit period	
29	The EMP (Construction Stage) shall be made publicly available.	NT		Not relevant to the current audit period	
30	The EMP (Construction Stage) shall include, but is not necessarily limited to, the following plans: (a) Soil and Water Management Plan (b) Construction Noise Management Plan (c) Dust Management Plan (d) Construction Waste Management Plan (e) Site Contamination Management Plan (f) Landscaping P lan	NT		Not relevant to the current audit period	
31	The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Construction Stage).	NT		Not relevant to the current audit period	
32	All site personnel (including contractors and subcontractors) during the construction stage must be inducted and trained to ensure compliance with the EMP (Construction Stage).	NT		Not relevant to the current audit period	
33	The Soil and Water Management Plan (SWMP) must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities. The SWMP must be prepared in accordance with the requirements for such plans outlined in Managing Urban Stormwater: Soils and Construction (available from the Department of Housing).	NT		Not relevant to the current audit period	
34	The Construction Noise Management Plan must address, but is not necessarily limited to, the following issues: (a) compliance standards (b) community consultation (c) complaints handling monitoring/system (d) site contact person to follow up complaints (e) mitigation measures, including details of any noise attenuation measures (f) the design and operation of the proposed mitigation methods demonstrating best practice (g) construction times (h) contingency measures where noise complaints are received (i) monitoring methods and programs.	NT		Not relevant to the current audit period	
35	The Dust Management Plan must include, but not necessarily be limited to, control strategies to achieve compliance with dust emission limits in this Consent and any environment protection licence.	NT		Not relevant to the current audit period	
36	The Construction Waste Management Plan must include, but not necessarily be limited to, strategies to ensure any waste generated during the construction stage is recycled, reused or disposed of in a lawful manner.	NT		Not relevant to the current audit period	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
37	The Site Contamination Management Plan must include, but not necessarily be limited to, the following issues that apply to construction stage activities: (a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination (b) A plan to manage dust in a manner that protects the health of on-site and off-site personnel.	NT		Not relevant to the current audit period	
38	The Landscaping Plan must include, but not necessarily be limited to: (a) the recommendations of the Visual Assessment Study in the EIS for landscaping and planting of native species, and (b) commitments by the Applicant for an appropriate financial or in-kind contribution towards landscaping the Parramatta Road frontage to soften and screen the access point as viewed from Parramatta Road.	NT		Not relevant to the current audit period	
<b>Environmental Management Plan (EMP) (Operation Stage)</b>					
39	The Applicant shall prepare an EMP (Operation Stage) which is specific to the development.	C	Operational Environmental Management Plan for Clyde Transfer Terminal (OEMP)	The draft OEMP specific to the site was observed.	
40	The EMP (Operation Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.	C	Operational Environmental Management Plan for Clyde Transfer Terminal (OEMP)	The Draft OEMP was reviewed and assessed as compliant with the conditions of consent and best management practice.	
41	The EMP (Operation Stage) shall include, but is not necessarily limited to, the following plans: (a) Waste Management Plan (b) Odour Management Plan (c) Dust Management Plan (d) Traffic Management Plan (e) Vermin and Pest Control Plan (f) Stormwater Management Plan (g) Site Contamination Management Plan (h) Incident Response Plan (i) Noise Management Plan (j) Operational Contingency Management Plan	C	Operational Environmental Management Plan for Clyde Transfer Terminal and various sub-plans	The Draft OEMP included the sub-plans required by the consent.	
42	The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Operation Stage).	C	Operational Environmental Management Plan for Clyde Transfer Terminal and various sub-plans	The draft OEMP addresses the relevant elements in Attachment of the consent.	
43	The Applicant must not accept any uncontainerised waste at the premises until the EMP (Operation Stage) has been approved by the Director-General.	C	Department of Planning Approval of the OEMP dated Feb 2008	Approval of the OEMP published online was observed during the audit.	
44	The Applicant shall certify the EMP (Operation Stage) as being in accordance with the Conditions of Consent prior to seeking approval of the Director-General.	C	The findings of this audit	This audit included a review of the draft OEMP and sub-plans to certify the documents are in accordance with the consent.	
45	All site personnel (including contractors and subcontractors) during the operational stage must be inducted and trained to ensure compliance with the approved EMP (Operation Stage).	C	Induction and LMS training records	Training records for inducted staff members were provided and reviewed and demonstrated a robust training process at Veolia.	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
46	The approved EMP (Operation Stage) shall be made publicly available on request to the Applicant.	C	<a href="https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station">https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</a>	The approved OEMP was observed to be available on the Veolia website.	
47	The Waste Management Plan must address, but is not necessarily limited to, the following issues: (a) Procedures for inspecting and recording each load of uncontainerised waste received at the terminal and for separating and disposing of any component of the waste that is not permitted to be accepted (b) Priority waste handling given to the most offensive wastes, otherwise “first in/first out” waste handling (c) Procedures for cleaning vehicles before they leave the premises in a manner that prevents the tracking of waste from the premises (d) An education program for all drivers of waste vehicles using the site, about waste types permitted to be received at the premises and the need to ensure their vehicle does not track waste from the premises (e) The inclusion of conditions in contracts with waste transporters addressing acceptable waste types and punitive measures for non-compliances (f) An enforcement program to be maintained for the duration of the development which includes the imposition of punitive measures for delivering unacceptable waste types (g) Procedures for minimising wind blown litter from leaving the premises and for regular patrols of surrounding areas to collect any litter that has been carried from the premises (h) Procedures for preventing washdown waters and any other liquid that has been in contact with waste from entering the stormwater system (i) An operational contingency plan to be implemented in the event of equipment failure, industrial action or other situation that prevents the containerisation of waste that has been in the terminal building in excess of 18 hours (j) Fire management procedures including the management of fire water in a manner that will not pollute waters.	C	Waste Management Plan for Clyde Transfer Terminal	The WMP was reviewed and addressed the requirements of the consent.	

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48	<p>The Odour Management Plan must address, but is not necessarily limited to, the following issues:</p> <p>(a) Procedures for the management of waste at the premises at all times to minimise the generation of odours.</p> <p>(b) Protocols for the operation of the odour control mechanisms for the terminal building, including the forced air extraction and odour filtration system, to minimise the risk of any adverse impact on surrounding commercial and residential areas.</p> <p>(c) Procedures for the maintenance and repair of the forced air extraction and odour filtration system on the terminal building, including the replacement of the dust filters and odour adsorption material</p> <p>(d) Criteria to be utilised to determine when the replacement of dust filters and odour adsorption material for the terminal building is to be carried out.</p> <p>(e) An emission monitoring program designed to determine the odour generation rates from the waste in the terminal building and to establish the capture and removal efficiency of the forced air extraction and odour filtration system and appropriate equipment maintenance schedules for replacement of dust filters and odour adsorption material. The program is to include odour emission monitoring using dynamic olfactometry in such a way as to allow determination of the performance of the odour control system with and without each component of the forced air extraction and odour filtration system in operation.</p> <p>(f) An odour audit program which provides for a comprehensive odour audit of the premises and nearby commercial and residential areas, by an independent, appropriately qualified and experienced person, to be conducted 3-monthly for the initial 24 months of receiving uncontainerised waste at the terminal, and 6-monthly thereafter, unless otherwise approved in writing by the Director-General.</p> <p>(g) An operational contingency plan to be initiated in the event of equipment failure, industrial action or any other situation that prevents the containerisation of any waste that has been in the terminal building in excess of 18 hours. Such a plan shall include suspending the acceptance of further uncontainerised waste at the premises.</p> <p>(h) A testing program designed to determine appropriate maintenance schedules for replacement of odour adsorption material in the pressure relief vents of the waste containers.</p> <p>(i) Procedures for the maintenance and repair of the odour adsorption and pressure relief vents of the waste containers, including the replacement of the odour adsorption material; and</p> <p>(j) A community consultation program on odour. The community consultation program may include a community survey, to be developed in conjunction with the community consultative committee.</p>	C	Odour Management Plan for Clyde Transfer Terminal	The OMP was reviewed and addressed the requirements of the consent.	
49	<p>The Dust Management Plan shall include but not necessarily limited to, control strategies to achieve compliance with any dust emission limits in this consent and any applicable environment protection license. The Dust Management Plan shall adopt the recommendations made by Turnkey Environmental Services Pty Ltd (dated 13 Feb 2006) and provided in Appendix D of the Statement of Environmental Effects Modification to the Termination Building Forced Ventilation System Clyde Waste Transfer Station (Environ, Oct 2006) in relation to the dust suppression spray system at the terminal. The Dust Management Plan shall provide for the monitoring of the performance of the dust suppression system and for improving its performance as it may be necessary. Following the receipt of any dust related complaints, the Planning Secretary may require the Applicant to undertake further investigations, monitoring or implement measures aimed to mitigate identified dust impacts on residential areas associated with the operation of the terminal</p>	C	Dust Management Plan for Clyde Transfer Terminal (DMP)	The DMP was reviewed and addressed the requirements of the consent.	

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50	<p>The Traffic Management Plan must address, but is not necessarily limited to, the following issues:</p> <p>(a) An education program for all drivers and owners of waste vehicles using the site, about the “left turn only” restrictions on entering and leaving the premises via Parramatta Road</p> <p>(b) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the “left turn only” restriction upon entering or leaving the premises via Parramatta Road.</p> <p>(c) An education program for all drivers and owners of waste vehicles using the site, about the waste transport routes permitted to be used in the vicinity of the development</p> <p>(d) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the permitted transport routes</p> <p>(e) An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached</p> <p>(f) Contracts with waste transporters to include conditions addressing entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances.</p> <p>(g) Measures to minimise trucks and other heavy vehicles from entering or exiting the premises between the following hours: 10pm and 5am Mondays to Saturdays; 10pm and 7am Sundays and public holidays.</p>	NC	Traffic Management Plan for the Clyde Transfer Terminal (TMP)	<p>The TMP was reviewed and addressed the requirements, with the exception of:</p> <p>(e) An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached</p> <p>(f) Contracts with waste transporters to include conditions addressing entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances.</p> <p>(g) Measures to minimise trucks and other heavy vehicles from entering or exiting the premises between the following hours: 10pm and 5am Mondays to Saturdays; 10pm and 7am Sundays and public holidays.</p> <p>The auditor understands punitive measures would be difficult for a commercial business to enforce. Veolia stated they prefer to re-train offending parties. Therefore it is recommended a modification to the consent to remove the requirement to enforce punitive damages.</p>	CTT-DA-NC-01
51	<p>The Vermin and Pest Control Plan must address, but is not necessarily limited to, the following issues:</p> <p>(a) Removing all waste from the tipping areas at the end of each day</p> <p>(b) Cleaning up all waste tipping and handling areas at the end of each day</p> <p>(c) Regular cleaning of catch drains and drainage sumps</p> <p>(d) Minimising onsite waste storage and handling</p> <p>(e) Maintaining any bird deterrent measures such as hanging wires</p> <p>(f) Routine inspection and action for potential vector habitats</p> <p>(g) Using commercial vector control specialists</p> <p>(h) Conducting routine litter patrols to collect trash on site, around the perimeter, on immediately adjacent properties and on approach roads.</p>	C	Vermin and Pest Control Plan for Clyde Transfer Terminal (VCPC)	The VCPC was reviewed and addressed the requirements of the consent.	
52	The Stormwater Management Plan must describe the post construction measures to be employed to operate and maintain the stormwater controls at the premises in a manner that minimises the pollution of waters.	C	Stormwater Management Plan for Clyde Transfer Terminal (SMP)	The SMP was reviewed and addressed the requirements of the consent.	
53	The Site Contamination Management Plan must include any actions recommended in the environmental report by the site auditor that apply to operation stage activities.	C	Site Contamination Management Plan for Clyde Transfer Terminal (SCMP)	The SCMP was reviewed and addressed the requirements of the consent.	

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54	<p>The Noise Management Plan shall be drafted in consultation with the rail operator for operation of the rail siding adjacent to the waste packaging terminal for the rail haulage services for Collex. The plan is to be submitted to Auburn Council. The plan must address the objective of mitigating operational rail noise from operations directly attributable to the loading and unloading of containers and associated rail operation on the siding adjacent to the Collex terminal, relating to the movement of containers from the Collex packing terminal. The plan must also identify reasonable noise mitigation strategies:</p> <p>a) Upgrade to hardstand areas utilised for loading and unloading of trains and rail track upgrade where feasible;  b) Resurfacing of hardstand area with appropriate noise mitigation materials;  c) Track repair and realignment where feasible and appropriate to minimise forklift travel having regard for other rail operations and heritage issues;  d) Container management protocols to minimise movement and handling of containers with an emphasis on noise mitigation;  e) Identification and utilisation of forklifts to minimise noise impacts and implement measures to minimise use of reversing alarms at night;  f) Establishment of a noise complaints procedure;  g) Investigating the scheduling of trains outside critical hours subject to metropolitan curfew, Rail Infrastructure Corporation slot management and rail operational considerations;  h) Ongoing community consultation; and  i) Employee education in noise mitigation practices.</p>	C	<p>Noise Management Plan for Clyde Transfer Terminal - Rail Operations (NMP - Rail)</p> <p>&amp;</p> <p>Noise Management Plan for Clyde Transfer Terminal - Terminal Operations (NMP - Terminal)</p>	The NMPs were reviewed and addressed the requirements of the consent.	
54A	<p>Prior to the commencement of expanded operations under DA No. 205-08-01 MOD 5, the Proponent must prepare an Operational Contingency Management Plan (OCMP) to the satisfaction of the Planning Secretary. The OCMP must form part of the EMP (Operation) required by condition 41. The OCMP must:</p> <p>(a) be prepared by a suitably qualified and experience person(s);  (b) be prepared in consultation with the EPA;  (c) detail the exception circumstances when the amount of waste in the terminal building would exceed 500 tonnes at any one time  (d) describe the measures in place to minimise the number of instances of these exceedances;  (e) identify all potential impacts arising from these instances;  (f) characterise these impacts, such as effects, duration, receptors, level of impact;  (g) detail appropriate mitigation measures.</p>	NT		Unable to audit the level of satisfaction of the Director - General	
54B	<p>The Proponent must</p> <p>(a) not commence expanded operations until the OCMP required by condition 54A is approved by the Planning Secretary; and  (b) implement the most recent version of the OCMP approved by the Planning Secretary for the duration of the development.</p>	NT		Unable to audit the level of satisfaction of the Director - General	

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<b>Environmental Management Representative (EMR)</b>					
55	<p>The Applicant shall employ or contract a suitably qualified Environmental Management Representative (EMR) throughout the duration of the development. The EMR shall:</p> <p>(a) be the principle person responsible for overseeing environmental management of the development and supervision of environmental services</p> <p>(b) have the authority to stop work if an adverse impact on the environment has occurred or is likely to occur</p> <p>(c) be responsible for the certification of all environmental management plans and procedures</p> <p>(d) be responsible for considering and advising on matters specified in the Conditions of Consent and compliance with such matters</p> <p>(e) oversee the receipt of, and response to, complaints about the environmental performance of the development</p> <p>(f) be present on-site during any critical construction or operational activity as defined in the relevant Environmental Management Plan</p> <p>(g) be a member of the Community Consultative Committee for the development</p>	C	DG approval of EMR dated 21/12/18 & PD for the Operations Project Manager	DG approval for the nominated EMR was provided in 2018.  The Position Description for the Operations Project Manager (nominated as EMR) includes these responsibilities.	
<b>Environmental Monitoring Program</b>					
56	<p>The Applicant shall prepare and implement a detailed Environmental Monitoring Program for the proposed development. The program shall include, but is not necessarily limited to, all the monitoring required by this Consent, the environment protection licence, the EMP (Construction Stage) and the EMP (Operation Stage) for the development. The program must:</p> <p>(a) Identify the environmental issues to be monitored</p> <p>(b) For each issue, indicate whether its monitoring is required by this Consent, the environment protection licence, the EMP (Construction Stage), the EMP (Operation Stage), or by another instrument</p> <p>(c) Set standards and performance measures for each issue</p> <p>(d) Describe in detail how each issue is to be monitored, who will conduct the monitoring, how often the monitoring will be conducted, and how the results of the monitoring will be recorded and reported to the Director-General and other relevant authorities</p> <p>(e) Indicate the actions taken and procedures to be followed if any non-compliance is detected.</p>	C	<p>Environmental Monitoring Program for Clyde Transfer Terminal (EMP)</p> <p>WIS-8466-CTT - Exceedances Notification Work Instruction</p>	The EMP was reviewed and it address the requirements of the condition.	
57	<p>All monitoring required by this Consent must be:</p> <p>(a) conducted by suitably qualified persons approved by the Director-General</p> <p>(b) conducted in accordance with established standards and protocols</p> <p>(c) reported annually in the Annual Environmental Management Report.</p>	C	Multiple odour monitoring reports and AEMRs	<p>All monitoring undertaken at the site is undertaken by personnel or contractors that are suitably qualified. The monitoring records for odour monitoring include detailed method statements that are consistent with Australian Standards (AS/NZS 4392.3:2001).</p> <p>Condition 57(a) also requires the persons undertaking the monitoring are approved by the Director-General. This written approval was unable to be supplied during the audit. It is likely the approval was sought in 2004 and may not have been filed electronically. However due to the monitoring reports being supplied to the department for many years and published online without issue, compliance is inferred.</p>	CTT-DA-OFI-01

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58	The Applicant shall include a report on the Environmental Monitoring Program in the Annual Environmental Management Report. The report must: (a) summarise the results from the Environmental Monitoring Program over the previous year (b) analyse the results in relation to both past performance, and the relevant standards and performance measures of the development (c) identify any emerging trends in the data over the life of the development (d) include a copy of the detailed monitoring results as an attachment.	C	The AEMR for 2019 and 2020	The AEMRs reviewed address the requirement of the condition	
<b>Annual Environmental Management Report</b>					
59	Between twelve and fourteen months after the issue date of an environment protection licence for the development, and annually thereafter for the duration of the development, the Applicant shall submit an Annual Environmental Management Report to the Director-General, the EPA and the Community Consultative Committee. The report shall be made available to the public on request to the Applicant. The report may be combined with the Annual Return required by the environment protection licence to be submitted to the EPA. The report must: (a) identify all the standards, performance measures, and statutory requirements the development is required to comply with (b) review the environmental performance of the development to determine whether it is complying with the standards, performance measures, and statutory requirements (c) identify each occasion during the previous year when the standards, performance measures, or statutory requirements have not been complied with (d) where any non-compliance is identified, describe the actions or measures taken to ensure compliance, who is responsible for carrying out the actions, and when the actions were (or will be) implemented (e) include a summary of any complaints made about the development, and indicate the actions taken to address the complaints (f) include a report on the Environmental Monitoring Program as specified in this Consent.	C	The AEMR for 2019 and 2020	The AEMRs reviewed address the requirement of the condition.	
<b>Independent Environmental Audits</b>					
60	Every year following the date of this consent, or at periods otherwise agreed to by the Director-General, and until such time as agreed to by the Director-General, the Applicant shall arrange for an independent audit of the environmental performance of the development. The audits shall: (a) be conducted pursuant to ISO 14010 – Guidelines and General Principles for Environmental Auditing, ISO 14011 – Procedures for Environmental Monitoring and any specifications of the Director-General; (b) be conducted by a suitably qualified independent person approved by the Director-General; (c) assess compliance with the requirements of this consent; (d) assess the implementation of the EMP (Construction) and EMP (Operation) and review the effectiveness of the environmental management of the development; and (e) be carried out at the Applicants' expense.	C	2019 Independent Environmental Audit Veolia Environmental Services Australia Clyde Transfer Terminal	Annual audits were observed for 2018 and 2019.	
<b>Monitoring and audit results to be publicly available</b>					
61	The results of all monitoring and auditing required by this Consent must be made publicly available at the same time they are submitted to the Director-General	C	<a href="https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station">https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</a>	Monitoring records were available online at the time of audit.	
<b>WASTE MANAGEMENT</b>					
<b>Waste Receipt and Removal</b>					
62	The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises unless permitted to do so by an environment protection licence.	C	Audit of the EPL	No evidence of non-compliance with this condition was observed.	

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63	The Applicant must ensure that waste received at the premises is restricted to inert and solid waste as defined in Schedule 1, Part 3 of the Protection of the Environment Operations Act 1997 or is assessed as inert waste or solid waste following the technical assessment procedure outlined in Technical Appendix 1 of the Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (EPA, 1999).	C	Site Inspection	All the waste is brought under a contract. The weighbridge checks the waste type from the contractor. At the tipping floor terminal personnel check waste is conformant.  The site inspection demonstrated there were sufficient facilities available at the site to remove and dispose of non-conforming waste.	
64	No waste shall be removed from the premises except: (a) construction waste arising from activities during the construction stage of the development (b) waste in sealed shipping containers to be transported by rail for disposal at the Woodlawn Bioreactor (c) small quantities of waste not permitted by the EPL to be received at the terminal, that have been separated out from the incoming waste stream through a documented operational procedure of regular waste inspections and associated control measures: these wastes are to be disposed of to a lawful waste facility (d) waste generated from onsite activities such as plant maintenance and repairs, that is not suitable for acceptance at the Woodlawn Bioreactor: these wastes are to be disposed of to a lawful waste facility (e) wastewater generated onsite: these wastes are to be disposed of to sewer (f) leachate generated from the onsite management of waste: these wastes are to be disposed of to sewer or a lawful liquid waste treatment plant (g) recyclable materials generated from the onsite office: these wastes are to be directed to a suitable recycling facility.	C	Site inspection & Waste Records	No evidence of non-compliance with this condition was observed from the records reviewed.	
65	The Applicant shall implement the approved Waste Management Plan to the satisfaction of the Director-General.	NT		Unable to audit the level of satisfaction of the Director - General.	
<b>Asbestos Waste</b>					
66	The Applicant will not accept asbestos at the premises. The Waste Management Plan must make provision for identification of asbestos in waste not knowingly received at the premises and for the proper and safe disposal of any asbestos so identified.	C	Site inspection, training records (asbestos training)	Training records were observed that demonstrated the site manager and leading hands were trained in asbestos identification. Posters noted during the site inspection showed there was communication to personnel to assist with the identification of asbestos.	
<b>Waste Management and Record Keeping</b>					

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67	Records shall be made and maintained of each load of waste entering the premises, including the identification of the vehicle, weight, nature and origin of the waste received, and whether the waste was received in pre-packaged shipping containers or for on-site containerisation.	C	Site inspection	The waste records observed during the site inspection addressed the condition of consent.	
68	Records shall be made and maintained of any waste leaving the premises by motor vehicle, including the identification of the vehicle, and the weight, classification and destination of the waste.	C	Waste Records observed during the site inspection	The waste records observed during the site inspection addressed the condition of consent.	
69	Records shall be made and maintained of all events involving the removal of any waste received at the premises which is not permitted to be accepted at the premises.	C	Waste Records observed during the site inspection	Records of non-compliant waste received at CTT and transported off-site were observed. This included gas bottles and steel waste.	
<b>ODOUR MANAGEMENT</b>					
70	<p>The Applicant shall install a forced ventilation system in the Terminal Building in accordance with MOD-133-11-2006, the design specified in the report Addendum to Final Report – Odour Mitigation Study – Clyde Waste Transfer Terminal – Collex Pty Ltd prepared by the Odour Unit Ltd and dated July 2006, and drawing N3630/100 tilted Clyde Transfer Terminal Roof and Gallery Level Proposed Ducting Layout Details prepared by Turnkey Environmental Systems Pty Ltd. The system shall include a single air exhaust stack to discharge all air from the waste receipt and compaction/loading building, in accordance with the following specifications;</p> <p>Minimum Stack Height (meters above existing ground level) Minimum Stack Height above the top of the roof (meters) Minimum Stack Diameter (meters) Minimum Stack Exit Velocity (m/s) Minimum Stack Exit Volumetric Flowrate (m3/s) Location (X coordinate) Location (Y coordinate) 21 4 2.64 20 109.48 317145 6254129</p> <p>The six original fans drawing air from the building through the odour control system shall be replaced with six fans of at least 18kW capacity (each) as per MOD-133-11-2006. The forced air extraction system installed under MOD-133-11-2006 shall be capable of operating in a proper and efficient manner under continuous duty</p> <p>Any variations of the design and specifications indicated above resulting from the detailed design of the odour control system shall be approved by the Planning Secretary, in consultation with the EPA, prior to the commencement of construction. As part of such approval, the Planning Secretary may require the Applicant to provide information demonstrating that the final design will not result in increased impacts as those predicted in the documents referred to under condition 1(e)</p>	NT		Unable to audit the level of satisfaction of the Director - General	
71	Construction of the Terminal Building forced ventilation system in accordance with MOD-133-11-2006 shall be undertaken under continuous operation of the original forced ventilation system (as per design approved by the Planning Secretary in correspondence to Collex dated 5 January 2003). Forced ventilation in the Terminal Building, by the operation of the original system or the new system subject to MOD-133-11-2006, shall not be interrupted at any time during the period of transferring odour control systems, unless otherwise approved by the Planning Secretary following a written application for temporary stoppage of the ventilation system during that period. Such application shall provide details of stoppage time required, impacts predicted, and proposed mitigation measures and notification requirements. This condition does not apply at times when waste is not contained within the building.	NT		Not relevant to the current audit period	
72	Prior to commencement of construction of the works required under MOD-133-11-2006, the Applicant shall notify the Planning Secretary, Auburn Council, the EPA and the Community Consultative Committee in writing of the date of commencement of construction, details of the main construction activities and anticipated duration of construction and times of the main construction activities.	NT		Not relevant to the current audit period	

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73	The Applicant shall implement the approved Odour Management Plan to the satisfaction of the Director-General.	NT		Not relevant to the current audit period	
74	The Applicant must not cause or permit the emission of offensive odours from the premises, as defined under section 129 of the Protection of the Environment Operations Act 1997.	C	Site inspection	No noticeable odour was noted outside of the terminal building at the time of the site inspection. The weekly inspection included an item for checking noticeable odour.  No odour complaints have been received for the CTT during the audit period.	
75	The Applicant shall continuously operate the forced ventilation system subject to MOD-133-11-2006 (and the original forced ventilation system until the system subject to MOD-133-11-2006 becomes operational) whenever waste is contained within the building, unless otherwise approved by the Planning Secretary. As part of such approval, the Planning Secretary may require the Applicant to carry out additional investigations and implement additional measures to mitigate any off-site impacts that may be anticipated or identified from such investigations.	C	Site inspection	Maintenance records of the forced ventilation system were observed and demonstrated the system is functioning. During the site inspection it appeared the forced ventilation system was operational.	
76	Within three months of the commissioning of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall conduct;  (a) odour emission rate sampling and analysis from the single stack (conducted in accordance with Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (EPA, January 2007)); and  (b) odour dispersion modelling for the stack odour discharge conducted in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA, August 2005) and the Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW (EPA, November 2006).	NT		Not relevant to the current audit period	
77	The results of any odour performance testing and modelling conducted in accordance with the conditions of this consent, including those required under condition 77, shall be submitted to the Community Consultative Committee, the EPA, the Planning Secretary and shall be made publicly available, within eight weeks of the testing and modelling having been completed.	NT		Not relevant to the current audit period	
78	Following the review of the investigations required under condition 77, or any other odour related investigations and documentation required under this consent, the Planning Secretary in consultation with the EPA may require the Applicant to carry out additional investigations and implement additional measures to mitigate any identified off-site odour impacts.	NT		Not relevant to the current audit period	
79	The results of any odour performance testing conducted in accordance with the conditions of this Consent may be submitted to the Director-General together with a proposal to vary the continuous operation of the forced air extraction and odour filtration system. The proposal must be prepared in consultation with the Community Consultative Committee and the EPA. Any variation to the continuous operation of the forced air extraction and odour filtration system must not be carried out except with the written approval of the Director-General.	NT		Not relevant to the current audit period	
80	All odour monitoring and management plans shall be made available to the public on request to the Applicant.	C	<a href="https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station">https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</a>	All odour monitoring records were observed to be published online.	
81	Any containerised waste shall not be exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent.	C	Site inspection	All waste containers observed during the site inspection were sealed and the pressure release was observed to be directed via a filtration system	

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82	The design of the pressure release mechanism and odour filtration system on the waste containers shall be approved by the Director-General prior to the acceptance of any uncontainerised waste at the premises.	NT		Not relevant to the current audit period	
83	Any waste that has been packed into containers on the site, shall not be re-exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent.	C	Site inspection	All waste containers observed during the site inspection were sealed and the pressure release was observed to be directed via a filtration system	
84	Deleted Condition (MOD-133-11-2006)	NT		Condition has been removed	
85	Deleted Condition (MOD-133-11-2006)	NT		Condition has been removed	
86	Deleted Condition (MOD-133-11-2006)	NT		Condition has been removed	
87	The Applicant shall carry out monitoring the forced ventilation system subject to MOD-133-11-2006 (including air emissions monitoring or other) as may be required under any Environment Protection License. The monitoring results shall be reported in the Annual Environmental Management report required under condition 59.	C	Clyde Waste Transfer Terminal Odour Audit XXXIII - XXXV  Annual Environmental Management Report - Clyde Transfer Terminal 2019	AEMRs for the audit period were reviewed and demonstrated monitoring was undertaken in accordance with the EPL. It should be noted the EPL does not specify monitoring of the forced ventilation system.	CTT-DA-OFI-02
88	Monitoring for the concentration of a pollutant emitted to the air must be done in accordance with: (a) any methodology which is required by or under the Protection of the Environment Operations Act 1997 to be used for the testing of the concentration of the pollutant; or (b) if no such requirement is imposed by or under the Protection of the Environment Operations Act 1997, any methodology which the general terms of approval or a condition of the licence (as the case may be) requires to be used for that testing; or (c) if no such requirement is imposed by or under the Protection of the Environment Operations Act 1997 or by the general terms of approval or a condition of the licence (as the case may be), any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	C	Clyde Waste Transfer Terminal Odour Audit XXXIII - XXXV  Annual Environmental Management Report - Clyde Transfer Terminal 2020	With reference to condition 88(a), the PEO Act refers to the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> , which does not prescribe a specific method for ambient odour monitoring. With reference to condition 88 (b), no specific method for ambient odour monitoring is prescribed in the consent conditions or EPL. In the most recent AEMR, Veolia states the standards used for ambient odour emissions are: <i>German Standard VDI 3940 "Determination of Odorants in Ambient Air by Field Inspections"</i> .  Discussions with the odour monitoring consultant (The Odour Unit) have confirmed the methods adopted for ambient odour monitoring are consistent with the methods EPA utilises for its monitoring. The ambient odour monitoring is undertaken in accordance with condition 48 (f).	
89	Deleted Condition (MOD-133-11-2006)	NT		Condition has been removed	
90	Prior to the installation of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall provide to the EPA, manufacturer's performance guarantees, demonstrating to the satisfaction of the EPA that the equipment will comply with the design parameters specified in this consent and/or the Environmental Protection License.	NT		Not relevant to the current audit period	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification																																																												
91	<p>A meteorological station must be sited and operated at the premises in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW. The Applicant shall undertake the sampling and analysis of the meteorological parameters specified in table below. Sampling and analysis of meteorological parameters shall be carried out strictly in accordance with the methods and references specified in the table.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin: 10px 0;"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Averaging Period</th> <th>Method<sup>1</sup></th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Wind Speed @ 10 m</td> <td>m/s</td> <td>1 hour</td> <td>AM-2 &amp; AM-4</td> <td>Continuous</td> </tr> <tr> <td>Wind Direction @ 10 m</td> <td>°</td> <td>1 hour</td> <td>AM-2 &amp; AM-4</td> <td>Continuous</td> </tr> <tr> <td>Sigma Theta @ 10 m</td> <td>°</td> <td>1 hour</td> <td>AM-2 &amp; AM-4</td> <td>Continuous</td> </tr> <tr> <td>Temperature @ 10 m</td> <td>K</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Temperature @ 2 m</td> <td>K</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Solar Radiation</td> <td>W/m<sup>2</sup></td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Rainfall</td> <td>mm</td> <td>24 hours</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Evaporation</td> <td>mm</td> <td>24 hours</td> <td>Note<sup>2</sup></td> <td>Continuous</td> </tr> <tr> <td colspan="3"><b>Additional Requirements</b></td> <td colspan="2"><b>Method<sup>1</sup></b></td> </tr> <tr> <td colspan="3">Siting</td> <td colspan="2">AM-1 &amp; AM-4</td> </tr> <tr> <td colspan="3">Measurement</td> <td colspan="2">AM-2 &amp; AM-4</td> </tr> </tbody> </table> <p><small>Note: <sup>1</sup> All methods are specified in the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW.  Note: <sup>2</sup> Method approved by the EPA in writing.</small></p>	Parameter	Units of measure	Averaging Period	Method <sup>1</sup>	Frequency	Wind Speed @ 10 m	m/s	1 hour	AM-2 & AM-4	Continuous	Wind Direction @ 10 m	°	1 hour	AM-2 & AM-4	Continuous	Sigma Theta @ 10 m	°	1 hour	AM-2 & AM-4	Continuous	Temperature @ 10 m	K	1 hour	AM-4	Continuous	Temperature @ 2 m	K	1 hour	AM-4	Continuous	Solar Radiation	W/m <sup>2</sup>	1 hour	AM-4	Continuous	Rainfall	mm	24 hours	AM-4	Continuous	Evaporation	mm	24 hours	Note <sup>2</sup>	Continuous	<b>Additional Requirements</b>			<b>Method<sup>1</sup></b>		Siting			AM-1 & AM-4		Measurement			AM-2 & AM-4		C	Meteorological station	Observed the meteorological station and the data required was included in the monitoring report.	
Parameter	Units of measure	Averaging Period	Method <sup>1</sup>	Frequency																																																													
Wind Speed @ 10 m	m/s	1 hour	AM-2 & AM-4	Continuous																																																													
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<b>DUST MANAGEMENT</b>																																																																	
92	The Applicant shall implement the Dust Management Plan (Construction Stage) and the approved Dust Management Plan (Operation Stage) to the satisfaction of the Director-General.	C	Site Inspection	No evidence of non-conformance with the dust management plan was observed during the audit.																																																													
93	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	C	Site inspection	No evidence of dust generating activities occurring at CTT were observed during the site inspection.																																																													
94	All trafficable areas and vehicle manoeuvring areas in or on the premises shall be maintained at all times in a condition that will minimise the generation or emission from the premises, of wind-blown or traffic generated dust.	C	Site inspection	The site was in a clean condition during the site inspection. Weekly and monthly inspection records included the inspection of litter. A street sweeper was available at the time of audit for daily sweeps of the site.																																																													
95	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading. (EPA)	C	Site inspection	No trucks were observed entering or exiting the site with the tailgate open. It was also observed the truck driver induction includes a requirement to keep the tail gate closed when entering or leaving the site.																																																													
96	The Applicant must prepare and implement an Ambient Air Quality Monitoring Plan. The Plan must address, but not necessarily be limited to, the following: (a) Monitoring methodologies and standards (sampling and analysis); (b) Monitoring for concentrations of total suspended particulates (TSP) and dust deposition rates; (c) Locations where monitoring will be carried out; (d) Detailed monitoring cycle and the duration of each monitoring cycle; and (e) Reporting.	C	Environmental Monitoring Program for Clyde Transfer Terminal  Odour Management Plan for Clyde Transfer Terminal  Dust Management Plan for Clyde Transfer Terminal	The monitoring programs that address this condition are described within: - Odour Management Plan - Dust Management Plan - Environmental Monitoring program																																																													
97	Deleted Condition (DA-205-08-01-MOD-3)	NT		Condition has been removed																																																													
<b>AIR MONITORING</b>																																																																	
98	Detailed records of operating conditions inside the waste terminal building shall be made coincident with any monitoring for odour or dust required by Conditions of this Consent.	C	Waste Records	Records for waste at the facility at any one time were available during the audit.																																																													
<b>WATER MANAGEMENT</b>																																																																	

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99	Except as may be expressly provided by a licence under the Protection of the Environment Operations Act 1997 in relation of the development, section 120 of the Protection of the Environment Operations Act 1997 must be complied with and in connection with the carrying out of the development.	C	Site Inspection & Stormwater Management Plan for Clyde Transfer Terminal	No evidence of potential stormwater contamination was observed during the site inspection. The documented stormwater management plan was reflected and adequately implemented during the audit.									
100	Any water that comes into contact with waste at the premises must be directed to the leachate collection system.	C	Site Inspection & Stormwater Management Plan for Clyde Transfer Terminal	All leachate waste observed to be directed to a leachate collection system which was taken off-site as liquid waste.									
101	The approved Soil and Water Management Plan must be implemented prior to and for the duration of the construction stage of the development.	NT		Not relevant to the current audit period									
102	Stormwater pollution controls must be implemented prior to and for the duration of the operation of the development. The controls shall be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the Scheme shall be consistent with the guidance contained in Managing Urban Stormwater: Council Handbook (available from the EPA). The controls shall incorporate minimum levels of treatment in the following table: <table border="1" style="margin-left: 40px; margin-top: 10px;"> <thead> <tr> <th>Development component</th> <th>Minimum level of stormwater treatment</th> </tr> </thead> <tbody> <tr> <td>Undeveloped sections of access road</td> <td>Existing overland flow to Duck River</td> </tr> <tr> <td>Roof water</td> <td>On-site detention</td> </tr> <tr> <td>Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units</td> <td>First flush system, GPT, oil and grease separation, on-site detention</td> </tr> </tbody> </table>	Development component	Minimum level of stormwater treatment	Undeveloped sections of access road	Existing overland flow to Duck River	Roof water	On-site detention	Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units	First flush system, GPT, oil and grease separation, on-site detention	C	Site Inspection & Stormwater Management Plan for Clyde Transfer Terminal	The stormwater management plan reviewed during the audit addressed this condition. The site inspection observed the minimum level of stormwater treatment. '	
Development component	Minimum level of stormwater treatment												
Undeveloped sections of access road	Existing overland flow to Duck River												
Roof water	On-site detention												
Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units	First flush system, GPT, oil and grease separation, on-site detention												
<b>SITE CONTAMINATION</b>													
103	The Site Contamination Management Plan must be implemented to the satisfaction of the Director-General, prior to and for the duration of the development	C	Site Contamination Management Plan for Clyde Transfer Terminal	No evidence of non-conformance with the Site Contamination Management Plan was observed during the audit.									
<b>NOISE MANAGEMENT</b>													
104	The Applicant shall implement the approved Construction Noise Management Plan, to the satisfaction of the Director-General.	NT		Not relevant to the current audit period									
105	The Applicant shall implement the Noise Management Plan, to the satisfaction of the Director-General.	C	Noise Management Plan for Clyde Transfer Terminal	No evidence of non-conformance with the Noise Management Plan was observed during the audit.									
106	All construction work at the premises that creates audible noise at residential premises must only be conducted between 7:00am and 5:00pm on Mondays to Fridays and between the hours of 8:00am and 5:00pm on Saturdays. There shall be no construction activities on Sundays or public holidays. The allowable construction times may be varied by an environment protection licence.	NT		Not relevant to the current audit period									
107	The delivery of construction material outside the hours of construction permitted by this Consent is not permitted except when required by police or other authorities for safety reasons; and/or because the operation, personnel or equipment are endangered. In such circumstances, notification is to be provided to the EPA and affected residents at least 24 hours prior to the delivery, or within a reasonable period in the case of an emergency.	NT		Not relevant to the current audit period									
108	Deleted Condition (DA-205-08-01-MOD-3)	NT		Condition has been removed									
109	Deleted Condition (DA-205-08-01-MOD-3)	NT		Condition has been removed									
110	Deleted Condition (DA-205-08-01-MOD-3)	NT		Condition has been removed									

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111	Deleted Condition (DA-205-08-01-MOD-3)	NT		Condition has been removed	
112	The Applicant shall implement a Heavy Vehicle Noise Monitoring Management Program for the development to the satisfaction of the Planning Secretary. This program must; (a) monitor heavy vehicle noise on site, in accordance with the methods outlined in the "Truck Noise Monitoring – Proposed Test and Management Plan" prepared by Heggies and dated 26 May 2008; (b) be undertaken quarterly for a year starting in October 2008, and annually thereafter, unless otherwise agreed by the Planning Secretary (c) measure at least 25% of the heavy vehicles visiting the site; (d) identify heavy vehicles exceeding the relevant noise criteria specified in Australian Design Rule 28/01, or its successor, and ensure that the owners of these subsequently comply with the relevant noise criteria (e) report the number of non-compliant heavy vehicles identified and the actions undertaken to address these non-compliances in the Annual Environmental Monitoring Report; and (f) be amended, should the monitoring activities not achieve the aim of the program to the satisfaction of the Planning Secretary	C	Noise Management Plan for Clyde Transfer Terminal - Terminal Operations  Annual Truck Noise Measurements Clyde Transfer Terminal 2019 & 2020	The Noise Management Plan for the site includes an annual noise monitoring program and noise limits for heavy vehicles. The Annual Truck Noise Measurements Clyde Transfer Terminal was reviewed and addressed the requirements of this condition.	
113	The Applicant shall implement an induction program for all drivers of trucks that deliver waste to the waste terminal with the objective of mitigating noise impacts of trucks entering and leaving the waste terminal, including driving procedures and throttle management. The program is to be designed in consultation with Auburn Council and is to emphasise the importance of noise emission control, driving and operating practices and procedures for night time activities.	C	Clyde Transfer Terminal - Driver Induction	An induction program for drivers was observed during the audit. It was advised during the audit this is delivered to the customer via the Site Manager attending the site and delivering a train the trainers presentation. This process has a reliance on the customers being proactive in delivering the training.  Records of drivers having completed the training are provided to Veolia for filing. No verification of customers drivers being completed (e.g. spot audit or annual review) was observed during the audit.	CTT-DA-OFI-03
114	The Applicant shall, in conjunction with the rail operator, implement an induction program for all train drivers and other rail staff dedicated to transporting containers to and from the Collex terminal area by train to Woodlawn. The program is to emphasise noise mitigation measures through "Good Neighbour" rail techniques such as notch control, idling practices, shunting speeds and engine control and shall form an integral part of the operational noise management plan.	C	None	Whilst the auditor was advised training has been supplied to the rail operator, no training records were available at the time of audit. It is understood Pacific National has internal training processes for "Good Neighbour" rail techniques that may be sufficient to address this condition however it was beyond the scope of this audit to verify this.	CTT-DA-OFI-04
<b>VERMIN AND PEST MANAGEMENT</b>					
115	The design of the terminal building and associated waste handling facilities shall incorporate such reasonable measures to eliminate or minimise the potential for birds, rodents, flies and other pests to congregate at the development. Consideration shall be given to incorporating the following measures: (a) sealing surfaces to prevent moisture and odour absorption (b) elimination of crevices where waste, moisture and vermin can accumulate (c) providing screening of the ventilation openings in the building (d) eliminating horizontal surfaces where birds can congregate (e) minimising horizontal ledges where dust and litter can accumulate (f) using fencing and netting to prevent wind-blown litter from escaping.	NT		Not relevant to the current audit period	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
116	The Vermin and Pest Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Director-General.	C	Site inspection and Vermin and Pest Control Plan for Clyde Transfer Terminal	The Vermin and Pest Control Plan was adequately implemented during the audit.	
117	The Applicant must take all practicable measures to prevent the attraction and infestation of the premises with vermin and pests.	C	Site Inspection	All reasonable and practical measures for preventing the attraction of vermin and pests was observed during the audit.	
<b>TRAFFIC MANAGEMENT</b>					
118	All access to the development shall be via a sealed access road from Parramatta Road. No vehicle shall enter or exit the development via the internal road connecting the Clyde Marshalling Yards to Rawson Street	C	Site Inspection	During the site inspection it was observed all vehicles were entering and exiting via the sealed access road from Parramatta Road. This requirement was also reflected in the site induction and traffic management plan.	
119	No vehicle is permitted to turn right into the site off Parramatta Road until the intersection upgrade works have been completed to the satisfaction of Cumberland Council and Roads and Maritime Services (RMS).	C	Site Inspection	During the site inspection no vehicles were observed to be turning right into the site off Parramatta Road. This requirement was also reflected in the site induction and traffic management plan.	
119A	Prior to the commencement of construction of the intersection upgrade works, the design of the intersection must be prepared in consultation with and to the satisfaction of Cumberland Council and RMS. The intersection design must accommodate the largest vehicle associated with the development as follows: (a) turning right into the development from Parramatta Road (e.g. 12.5 metre rigid waste trucks); (b) turning left into the development from Parramatta Road (e.g. semi trailers); and (c) turning left out of the development onto Parramatta Road (e.g. semi trailers)	NT		Not relevant to the current audit period	
119B	All intersection works must be to the full cost of the Proponent and at no cost to RMS or Cumberland Council	NT		Not relevant to the current audit period	
119C	The intersection upgrade works along Parramatta Road/private access road must be designed to meet RMS requirements, and endorsed by a suitable qualified practitioner. The design requirements must be in accordance with AUSTRROADS and other Australian Codes of Practice. The certified copies of the civil design plans must be submitted to RMS for consideration and approval prior to the release of the Construction Certificate by the Principle Certifying Authority and commencement of road works	NT		Not relevant to the current audit period	
119D	The Proponent is required to enter into a Work Authorisation Deed (WAD) for the intersection works.	NT		Not relevant to the current audit period	
119E	Within 6 months of commencement of right-turn movements into the site, a road safety audit (RSA) must be undertaken for the intersection of Parramatta Road and the private access road by a suitably qualified, independent professional. The results of the RSA, including a program for the implementation of any audit recommendations, must be submitted to Cumberland Council and RMS for consideration and review within 60 days of completion of the audit.	NT		Not relevant to the current audit period	
120	No vehicle exiting the development shall turn right onto Parramatta Road.	C	Site Inspection	During the site inspection no vehicles were observed to be turning right from the site off Parramatta Road. This requirement was also reflected in the site induction and traffic management plan.	
121	The Traffic Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Director-General.	C	Site Inspection	The Traffic Management Plan was adequately implemented at the time of audit.	
122	Prior to the commencement of construction activities, the Applicant shall demonstrate to the satisfaction of the Director-General, it has reasonable arrangements in place in respect of its use of the right of carriageway, concerning traffic sharing, protection of underground and above-ground services in the vicinity of the carriageway and the potential impacts on the existing weighbridge.	NT		Not relevant to the current audit period	

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123	Deleted Condition (DA-205-08-01-MOD-5) The Applicant shall fund a traffic study, to be conducted by an independent, suitably qualified person. The study is to be completed and submitted to the Director-General within 14 months from commencement of operations, review the operation of the access road in the first 12 months of the development and recommend any future actions to ensure sufficient future capacity of the access road. The Applicant shall provide a reasonable financial contribution towards any upgrade of the access road recommended by the study.	NT		Not relevant to the current audit period	
124	The Applicant shall fund a traffic study, to be conducted by an independent, suitably qualified person. The study is to be completed and submitted to the Director-General within 14 months from commencement of operations, review the operation of the access road in the first 12 months of the development and recommend any future actions to ensure sufficient future capacity of the access road. The Applicant shall provide a reasonable financial contribution towards any upgrade of the access road recommended by the study.	NT		Not relevant to the current audit period	
<b>EMERGENCY MANAGEMENT</b>					
<b>Emergency Management Plan</b>					
125	In relation to activities, which in the event of a disruption to operations may result in significant pollution being emitted, the Applicant must: (a) conduct an assessment to determine the potential internal and external causes of disruption of operations at the premises; (b) determine how these disruptions would impact on operations; and (c) identify the pollution that would result due to the disruption of operations and what impact the pollution would have on the health of the community and the environment.	C	Emergency Response Plan - Clyde Transfer Terminal	Emergency Response Plan includes an identification of the events that could result in a significant pollution event.	
126	In relation to matters identified in the previous condition, the Applicant must prepare an Emergency Management Plan. The Plan shall address, but not necessarily be limited to: (a) identification of threats to the environment and/or public health that could arise in relation to the construction and operation of development. These threats may include fire, overflow, power or other utility failure, natural disaster etc; (b) identification of strategies to minimise and ameliorate the effects of any water pollution identified from the groundwater and surface water monitoring programs; (c) an estimate of the cost of implementation; (d) actions to effectively respond to the disruption of operations so the risk of pollution is minimised; (e) a communications strategy for alerting relevant agencies and the potentially affected community in the event of the disruption to operations leading to significant pollution; and (f) ensuring that all relevant employees are familiar with the emergency management plan.	NC	Emergency Response Plan - Clyde Transfer Terminal	The Emergency Response Plan was reviewed as part of the audit and the document addresses the requirements of the condition with the exception of: (c) an estimate of the cost of implementation	CTT-DA-NC-02
127	The Applicant shall consult with the NSW Fire Brigades and install a fire main and hydrants as required by the Fire Brigades. The system shall comply with AS 2419.	NT		Not relevant to the current audit period	
<b>LANDSCAPING</b>					
128	The Applicant shall implement the Landscaping Plan in consultation with Auburn Council and to the satisfaction of the Director-General.	C	Site inspection	The landscaping plan was adequately implemented at the time of audit and site inspection.	
<b>DEVELOPMENT SETBACK</b>					
129	The Applicant shall not construct any new buildings, hardstand, storage areas or vehicle manoeuvring areas within 30 metres of the Duck River Mean High Water Mark (as measured horizontally), to allow for the establishment of a viable riparian zone and multi-purpose recreation path.	NT		Not relevant to the current audit period	
<b>RIPARIAN RESTORATION</b>					
130	The Applicant shall prepare at its own expense a site specific Riparian Zone Management Plan to address the issues contained in Auburn's draft Duck River Riparian Management Plan. The Plan shall be submitted to Auburn Council's Director Service Planning prior to the issue of the Occupation Certificate, or as otherwise agreed to by Auburn Council. Any riparian restoration activities undertaken by the Applicant shall, where appropriate, be consistent with but not necessarily limited to the activities listed in Attachment 3.	C	Audit Interview	It is understood the previous Council was not interested in collaborating with Veolia to address this condition. There is a new amalgamated Council that has commenced operations since the previous engagement.	CTT-DA-OFI-05
<b>DUCK RIVER ACCESSWAY</b>					

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131	The Applicant shall facilitate as appropriate and as required by the Director-General, the provision of a 3.0 metre wide reinforced concrete multi-purpose recreation path along the landward side of a 30 metre riparian/public open space dedication zone between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.	C	Audit Interview	It is understood the previous Council was not interested in collaborating with Veolia to address this condition. There is a new amalgamated Council that has commenced operations since the previous engagement.	CTT-DA-OFI-05
<b>LAND DEDICATION</b>					
132	The Applicant shall facilitate as appropriate and as required by the Director-General and/or contribute to the dedication to Auburn Council of land incorporating the riparian restoration zone and multi-purpose recreation path between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.	C	Audit Interview	It is understood the previous Council was not interested in collaborating with Veolia to address this condition. There is a new amalgamated Council that has commenced operations since the previous engagement.	CTT-DA-OFI-05
<b>HERITAGE</b>					
133	The Applicant shall contribute to the development and installation of heritage interpretation signage in consultation with Auburn Council, regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and associated pre-use of the area occupied by the development. The heritage signage is to be approved by Auburn Council and installed within 6 months of commencement of the approved use or as otherwise agreed to by Auburn Council.	NT		Not relevant to the current audit period	
<b>COMMUNITY LIASON</b>					
<b>Community Consultative Committee</b>					
134	The Proponent must make all reasonable attempts to establish and maintain a Community Consultative Committee generally in accordance with the Community Consultative Committee Guidelines for State Significant Projects, unless otherwise agreed to in writing by the Planning Secretary. The Proponent must submit a report to the Department every 12 months documenting its progress in establishing and maintaining the Community Consultative Committee over time.	C	<a href="https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station">https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</a>	Since receipt of the conditions of consent, Veolia has attempted to establish a Community Consultative Committee with little success. Therefore alternative measures have been proposed and approved by the DPIE, including: <ul style="list-style-type: none"> <li>● Publishing the community information phone line and email address on the Veolia's Corporate Website on the Clyde Transfer Terminal webpage.</li> <li>● Inviting community members to an Open Day at Clyde Transfer Terminal.</li> <li>● Creation of an email distribution list to engage with interested stakeholders on a routine basis communicating updates on activities on site.</li> <li>● Sending Clyde Transfer Terminal's Annual Environmental Monitoring Reports (AEMR) to Cumberland Council.</li> </ul>	
135	The Applicant shall, at its own expense: (a) provide appropriate facilities for meetings of the Committee; (b) nominate a representative to attend all meetings of the Committee; (c) provide to the Committee regular information on the progress of the work and monitoring results; (d) promptly provide to the Committee such other information as the Chairperson of the Committee may reasonably request concerning the environmental performance of the development; and (e) provide reasonable access for site inspections by the Committee.	C	<a href="https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station">https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</a>	As above	
136	The Applicant shall establish a trust fund to be managed by the Chairperson of the Committee to facilitate functioning of the Committee, and pay \$2000 per annum to the fund for the duration of the development. The payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. The Applicant shall also contribute reasonable funds for payment of the independent Chairperson, to the satisfaction of the Director-General.	NC	Audit Interview	The condition requires Veolia to establish and maintain a trust fund to facilitate the functioning of the Community Consultative Committee. During the audit it was determined Veolia had not established such a fund. Whilst it is understood a community consultative committee has not been able to be established, the requirement for payment to a trust fund as required by this condition has not been removed. Therefore Veolia has not demonstrated reasonable compliance with this condition.	CTT-DA-NC-03
<b>COMMUNITY ENHANCEMENT PROGRAM</b>					

**Clyde Transfer Terminal  
2020 Independent Environmental Audit  
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
137	<p>Prior to the commencement of construction, or as otherwise approved by the Director-General in consultation with Auburn Council, the Applicant shall take all reasonable steps to negotiate an agreed outcome with Auburn Council for an appropriate level of contribution (financial or in-kind) towards mitigating the social and community impacts resulting from the construction and operation of the development.</p> <p>The contribution shall provide, but not necessarily be limited to, the following:</p> <p>(a) the payment of \$50,000 (unless otherwise agreed to by the Director-General) to Auburn Council as a contribution to the drafting of a masterplan for the entire Clyde Marshalling Yards</p> <p>(b) appropriate monetary lump sum contributions to be negotiated with Auburn Council for the purposes of:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> the widening of the Western Overbridge;</li> <li><input type="checkbox"/> establishing a vegetated riparian restoration zone along the eastern bank of Duck River from Parramatta Road to the Clyde railway bridge;</li> <li><input type="checkbox"/> establishing a multi-purpose recreation path adjacent to the riparian zone from Parramatta Road to the Clyde railway bridge; and</li> <li><input type="checkbox"/> the development and installation of heritage interpretation signage along the multi-purpose recreation path regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and associated pre-use of the area occupied by the development.</li> </ul> <p>(c) ongoing or as otherwise agreed to financial contributions proportional to the tonnage throughput of the terminal for the purpose of local community enhancement projects and/or activities in accordance with a community enhancement plan to be prepared by Auburn Council to reflect community priorities and needs.</p> <p><i>Should such a negotiated outcome not be reached, the Applicant shall abide by the requirements of the Director-General concerning community enhancement contribution in light of an independent investigation to establish such contribution. Such investigation is to be carried out by an independent person(s) to be appointed by the Director-General in consultation with the Applicant and Auburn Council.</i></p> <p><i>The commencement of any construction on-site shall not proceed unless the above outcomes have been agreed or otherwise approved by the Director-General in consultation with Auburn Council.</i></p>	NT		Not relevant to the current audit period	
	<b>Elements to be addressed in the Environmental Management Plan (Construction Stage) and the Environmental Management Plan (Operation Stage)</b>				

**Clyde Transfer Terminal**  
**2020 Independent Environmental Audit**  
Determination of a Development Application for State Significant, Development Consent (205-08-01)

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
Attachment 1	<p>The EMP (Construction Stage) and EMP (Operation Stage) shall address but not be limited to:</p> <ol style="list-style-type: none"> <li>1. identification of the statutory and other obligations which the Applicant is required to fulfil during construction stage including all approvals and consultations/agreements required from authorities and other stakeholders, and key legislation and policies which control the Applicant's implementation of the development</li> <li>2. periodic or otherwise revision of the EMP to address changed or evolving circumstances</li> <li>3. definition of the role, responsibility, authority, accountability and reporting of all personnel relevant (including sub-contractors) to compliance with the construction EMP</li> <li>4. measures to avoid the occurrence of adverse environmental impacts</li> <li>5. induction and training of all personnel (including sub-contractors) to ensure compliance with the construction EMP</li> <li>6. the role of the EMR</li> <li>7. measures to provide positive environmental offsets to unavoidable adverse environmental impacts</li> <li>8. environmental management procedures for all construction processes which are important for the quality of the environment in respect of permanent and/or temporary works</li> <li>9. monitoring, inspection and test plans for all activities and environmental qualities which are important to the environmental management of the project including performance criteria, specific tests, protocols (eg. frequency and location) and procedures to follow including procedures for notifying all relevant authorities should non-compliance with any limits or performance standards specified in the construction EMP arise</li> <li>10. environmental management instructions for all complex environmental control processes which do not follow common practice or where the absence of such instructions could be potentially detrimental to the environment</li> <li>11. requirements to undertake environmental audits to ensure that the construction EMP is working and steps the Applicant intends to take to ensure that all plans and procedures are being complied with</li> <li>12. delegation of responsibilities for compliance with the EMP and relevant environmental statutes</li> <li>13. community consultation and notification strategy (including the local community and all relevant authorities) and complaint handling procedures</li> <li>14. project records to be maintained to provide objective evidence of the level of compliance with the construction EMP.</li> </ol>	NT		Not relevant to the current audit period	

**Clyde Transfer Terminal  
2020 Independent Environmental Audit  
Environmental Protection License (No. 11763)**

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification									
<b>1</b>	<b>Administrative Conditions</b>													
<b>A1</b>	<b>What the licence authorises and regulates</b>													
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.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Waste processing (non-thermal treatment)</td> <td>Non-thermal treatment of general waste</td> <td>Any annual processing capacity</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - other types of waste</td> <td>Any other types of waste stored</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity	Waste storage	Waste storage - other types of waste	Any other types of waste stored	C	Site inspection and audit interviews	Only authorised scheduled activities as detailed in the condition were observed to be undertaken on the site.	
Scheduled Activity	Fee Based Activity	Scale												
Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity												
Waste storage	Waste storage - other types of waste	Any other types of waste stored												
<b>A2</b>	<b>Premises or plant to which this licence applies</b>													
A2.1	<p>The licence applies to the following premises:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Premises Details</th> </tr> </thead> <tbody> <tr> <td>CLYDE TRANSFER TERMINAL</td> </tr> <tr> <td>PARRAMATTA ROAD</td> </tr> <tr> <td>CLYDE</td> </tr> <tr> <td>NSW 2142</td> </tr> <tr> <td>PART LOT 201 DP 1007683</td> </tr> </tbody> </table>	Premises Details	CLYDE TRANSFER TERMINAL	PARRAMATTA ROAD	CLYDE	NSW 2142	PART LOT 201 DP 1007683	C	Site inspection	The site is located at the listed premises.				
Premises Details														
CLYDE TRANSFER TERMINAL														
PARRAMATTA ROAD														
CLYDE														
NSW 2142														
PART LOT 201 DP 1007683														
<b>A3</b>	<b>Information supplied to the EPA</b>													
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 the 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>	C	Compliance register	Management plans developed in accordance with the conditions and audited. A compliance program is undertaken annually to verify compliance.										
<b>2</b>	<b>Discharges to Air and Water and Applications to Land</b>													
<b>P1</b>	<b>Location of monitoring /discharge points and areas</b>													

**Clyde Transfer Terminal**  
**2020 Independent Environmental Audit**  
**Environmental Protection License (No. 11763)**

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification															
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="4" style="text-align: center;"><i>Air</i></th> </tr> <tr> <th style="text-align: center;">EPA identification no.</th> <th style="text-align: center;">Type of Monitoring Point</th> <th style="text-align: center;">Type of Discharge Point</th> <th style="text-align: center;">Location Description</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">Air emissions monitoring; Discharge to air</td> <td style="text-align: center;">Air emissions monitoring; Discharge to air</td> <td style="text-align: center;">A 2.64 diameter exhaust stack, 21 metres above ground level installed centrally to the roof line supported off the mezzanine level, labelled as "New stack 2640mm" on map titled "Stack position-centre discharge" submitted to the EPA on 5 Nov 2007</td> </tr> </tbody> </table>	<i>Air</i>				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Air emissions monitoring; Discharge to air	Air emissions monitoring; Discharge to air	A 2.64 diameter exhaust stack, 21 metres above ground level installed centrally to the roof line supported off the mezzanine level, labelled as "New stack 2640mm" on map titled "Stack position-centre discharge" submitted to the EPA on 5 Nov 2007	C	Site Inspection	A single air emission point was noted during the audit on the roof of the waste facility.				
<i>Air</i>																				
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																	
1	Air emissions monitoring; Discharge to air	Air emissions monitoring; Discharge to air	A 2.64 diameter exhaust stack, 21 metres above ground level installed centrally to the roof line supported off the mezzanine level, labelled as "New stack 2640mm" on map titled "Stack position-centre discharge" submitted to the EPA on 5 Nov 2007																	
<b>3</b>	<b>Limit Conditions</b>																			
<b>L1</b>	<b>Pollution of waters</b>																			
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.	C	Site Inspection & Stormwater Management Plan for Clyde Transfer	No evidence of potential stormwater contamination was observed during the site inspection. The documented stormwater management plan was reflected and adequately implemented																
<b>L2</b>	<b>Waste</b>																			
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Code</th> <th style="text-align: center;">Waste</th> <th style="text-align: center;">Description</th> <th style="text-align: center;">Activity</th> <th style="text-align: center;">Other Limits</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">NA</td> <td style="text-align: center;">General solid waste (putrescible)</td> <td style="text-align: center;">As defined in Schedule 1 of the POEO Act, in force from time to time</td> <td style="text-align: center;">Waste processing (non-thermal treatment) Waste storage</td> <td style="text-align: center;">NA</td> </tr> <tr> <td style="text-align: center;">NA</td> <td style="text-align: center;">General solid waste (non-putrescible)</td> <td style="text-align: center;">As defined in Schedule 1 of the POEO Act, in force from time to time</td> <td style="text-align: center;">Waste processing (non-thermal treatment) Waste storage</td> <td style="text-align: center;">NA</td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste processing (non-thermal treatment) Waste storage	NA	NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste processing (non-thermal treatment) Waste storage	NA	C	Site Inspection, Waste Records, Weighbridge Operators Work Instruction, Control of Non-Conforming Waste Procedure	<p>Only general solid waste was observed to be received at the site during the site inspection and based on a review of the waste records.</p> <p>Further controls observed to minimise non-conforming waste entering the waste stream was the procedure for non-conforming waste, facilities for the removal of non-conforming waste (e.g. gas bottles and steel), signage at the entrance detailing prohibited waste and work instructions for weighbridge operators detailing actions for non-conforming waste. Training on work instructions was also verified during the audit.</p>	
Code	Waste	Description	Activity	Other Limits																
NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste processing (non-thermal treatment) Waste storage	NA																
NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste processing (non-thermal treatment) Waste storage	NA																
L2.2	The authorised amount of waste permitted on the premises cannot exceed 4,000 tonnes at any one time.	C	Site Inspection	It was observed during the audit the capacity for waste at the site would be approx. 3,000 tonnes.																
<b>L3</b>	<b>Noise limits</b>																			

**Clyde Transfer Terminal**  
**2020 Independent Environmental Audit**  
**Environmental Protection License (No. 11763)**

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification																				
L3.1	<p>Noise generated at the premises must not exceed the noise limits presented in the table below:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Location</th> <th>Day - LAeq (15 min)</th> <th>Evening - LAeq (15 min)</th> <th>Night - LAeq (15 min)</th> <th>Night- LA1 (1 min)</th> </tr> </thead> <tbody> <tr> <td>First St, Granville (nearest residence)</td> <td>44</td> <td>38</td> <td>39</td> <td>56</td> </tr> <tr> <td>10 Hampstead Rd, Auburn</td> <td>40</td> <td>38</td> <td>38</td> <td>54</td> </tr> <tr> <td>17 Cumberland Rd, Auburn</td> <td>41</td> <td>39</td> <td>39</td> <td>52</td> </tr> </tbody> </table>	Location	Day - LAeq (15 min)	Evening - LAeq (15 min)	Night - LAeq (15 min)	Night- LA1 (1 min)	First St, Granville (nearest residence)	44	38	39	56	10 Hampstead Rd, Auburn	40	38	38	54	17 Cumberland Rd, Auburn	41	39	39	52	C	Audit Interview	No noise complaints were received by the facility during the Audit period.	
Location	Day - LAeq (15 min)	Evening - LAeq (15 min)	Night - LAeq (15 min)	Night- LA1 (1 min)																					
First St, Granville (nearest residence)	44	38	39	56																					
10 Hampstead Rd, Auburn	40	38	38	54																					
17 Cumberland Rd, Auburn	41	39	39	52																					
L3.2	<p>For the purpose of Condition L3.1:</p> <p>a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays,</p> <p>b) Evening is defined as the period from 6pm to 10pm</p> <p>c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays</p> <p>d) LAeq(15minute) is defined as the equivalent continuous 'A' weighted sound pressure level- the energy average of the noise measured over a 15 minute period.</p> <p>e) LA1 (1 minute) is defined as the sound pressure level exceeded for one percent of a 1 minute measurement period.</p>	NT		This is a note only not auditable																					
L3.3	Noise from the Clyde Transfer Terminal premises is to be measured at the most affected point on or within the residential boundary to determine compliance with the LAeq(15 minute) noise limits in condition L3.1.	NT		Not relevant to the current audit period																					
L3.4	Noise from the Clyde Transfer Terminal premises is to be measured at 1m from the dwelling façade to determine compliance with the LA1(1 minute) noise limits in condition L3.1.	NT		Not relevant to the current audit period																					
L3.5	The noise emission limits identified in condition L3.1 apply under meteorological conditions of: <ul style="list-style-type: none"> <li>• Wind speeds up to 3 m/s at 10 metres above ground level; and/or</li> <li>• Temperature inversion conditions of up to 3 degrees Celsius/100m.</li> </ul>	NT		Not relevant to the current audit period																					
<b>L4</b>	<b>Potentially offensive odour</b>																								
L4.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.	C	Site Inspection & Clyde Odour Audits XXXV & XXXIV	No noticeable odour was identified outside the terminal during the site inspection. Odour monitoring data for 2019 and 2020 demonstrated the ambient odour levels are below the performance criteria of 2 odour units.																					
<b>L5</b>	<b>Other limit conditions</b>																								
L5.1	The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the Protection of the Environment Operations (Waste) Regulation 2014.	NT		Not relevant to the current audit period																					
<b>4</b>	<b>Operating Conditions</b>																								
<b>O1</b>	<b>Activities must be carried out in a competent manner</b>																								

**Clyde Transfer Terminal**  
**2020 Independent Environmental Audit**  
**Environmental Protection License (No. 11763)**

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
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.	C	LMS Training Records	The training records were observed as part of the audit and demonstrated all personnel receive adequate training to ensure awareness and competence.	
<b>O2</b>	<b>Maintenance of plant and equipment</b>				
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.	C	Maintenance Records and Site Inspection	Maintenance schedules for fixed plant are managed via SAP. Mobile plant is maintained by the manufacturers in accordance with their specifications.  To verify adequate maintenance records for the following plant was requested and verified: - Humesceptor (annual pump-out) - Extraction fans - Container handlers  During the site inspection all plant and equipment was observed to be in good maintenance.	
<b>O3</b>	<b>Dust</b>				
O3.1	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.	C	Site Inspection	No evidence of dust generating activities occurring at CTT were observed during the site inspection.	
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	C	Site inspection	No trucks were observed entering or exiting the site with the tailgate open. It was also observed the truck driver induction includes a requirement to keep the tail gate closed when entering or leaving the site.	
<b>O4</b>	<b>Emergency Response</b>				
O4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.	C	Emergency Response Plan - Clyde Transfer Terminal	A up to date Emergency Response Plan was observed during the audit.	
O4.2	The licensee must have adequate fire prevention measures in place, and ensure that facility personnel are able to access fire-fighting equipment and manage fire outbreaks at any part of the premises.	C	Site Inspection	Adequate fire prevention equipment was observed during the site inspection.	
<b>O5</b>	<b>Processes and management</b>				
O5.1	The licensee must ensure that any general solid waste (putrescible) and/or general solid waste (non-putrescible) received for storage or recovery or processing at the premises is assessed and classified in accordance with the DECC Waste Classification Guidelines as in force from time to time.	C	NSW Resource Recovery Incoming Waste Classification Flowchart & Incoming Weighbridge Report	Waste records are classified in accordance with the DECC Waste Classification Guidelines.	

**Clyde Transfer Terminal**  
**2020 Independent Environmental Audit**  
 Environmental Protection License (No. 11763)

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification								
O5.2	The licensee must ensure that each waste for recovery/recycling is stockpiled separately.	NT		Not relevant to the current audit period									
<b>O6</b>	<b>Waste Management</b>												
O6.1	Stormwater and wastewater management – operating phase. All areas that involve the handling of waste including container transfer and handling areas, clean container storage areas and internal roadways must be sealed.	C	Site Inspection	All areas involved in the handling of waste, containers or internal roadways were sealed.									
O6.2	Vehicles leaving the premises must not track materials to external surfaces.	C	Site Inspection	No evidence of material tracking to external surfaces was observed during the site inspection.									
<b>5</b>	<b>Monitoring and Recording Conditions</b>												
<b>M1</b>	<b>Monitoring records</b>												
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.	C	Odour and Noise Monitoring Records (2019 - 2020)	Monitoring records were observed during the audit.									
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	C	Odour and Noise Monitoring Records (2016)	Monitoring records for 2016 were observed and available at the time of audit.									
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	C	Odour and Noise Monitoring Records (2019 - 2020)	The monitoring reports maintained on-site included the details required by this condition.									
<b>M2</b>	<b>Requirement to monitor concentration of pollutants discharged</b>												
M2.1	Air <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Other</th> <th>Units of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Selection of sampling positions</td> <td>-</td> <td>-</td> <td>TM-1</td> </tr> </tbody> </table>	Other	Units of Measure	Frequency	Sampling Method	Selection of sampling positions	-	-	TM-1	NT		Not relevant to the current audit period	
Other	Units of Measure	Frequency	Sampling Method										
Selection of sampling positions	-	-	TM-1										
<b>M3</b>	<b>Recording of pollution complaints</b>												

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
M3.1	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.	C	CTT Complaints Register	No complaints received within the audit period. A register of complaints was observed during the audit.	
M3.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	C	CTT Complaints Register	The complaints register includes the possibility to include these records.	
M3.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	C	CTT Complaints Register	No complaints received within the last 4 years.	
M3.4	The record must be produced to any authorised officer of the EPA who asks to see them.	NT		Not relevant to the current audit period	
<b>M4</b>	<b>Telephone complaints line</b>				
M4.1	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.	C	<a href="https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer">https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer</a>	The complaints line was communicated on the site website.	
M4.2	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.	C	<a href="https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station">https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</a>	The complaints line was communicated on the site website and documented on the site entrance.	
M4.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	NT		Not relevant to the current audit period	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
<b>6</b>	<b>REPORTING CONDITIONS</b>				
<b>R1</b>	<b>Annual return documents</b>				
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 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.	C	Annual Return (2019 & 2020)	The annual returns reviewed were submitted in the approved form.	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	C	Annual Return (2019 & 2020)	The annual returns were submitted for the required reporting period.	
R1.3	Where this licence is transferred from the licensee to a new licensee: 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 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.	NT		Not relevant to the current audit period	
R1.4	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: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	NT		Not relevant to the current audit period	
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').	C	Annual Return (2019 & 2020)	The annual returns were submitted within 2 months of the reporting period.	
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.	C	Annual Return (2016)	The annual return for 2016 was observed in the Veolia folder during the audit.	
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.	C	Annual Return (2019 & 2020)	The annual returns were certified.	
<b>R2</b>	<b>Notice of environmental harm</b>				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	NT		Evidence of a notification for a different site was observed. No relevant incident requiring notification was observed during the audit period.  The corporate incident management procedure includes the procedure for notification of the EPA.	
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.	NT		Not relevant to the current audit period	
<b>R3</b>	<b>Written report</b>				

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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.	NT		No evidence that a written report has been requested from the EPA in the last 2 years.	
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.	NT		No evidence that a written report has been requested from the EPA in the last 2 years.	
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.	NT		No evidence that a written report has been requested from the EPA in the last 2 years.	
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	NT		No evidence that a written report has been requested from the EPA in the last 2 years.	
<b>7</b>	<b>GENERAL CONDITIONS</b>				
<b>G1</b>	<b>Copy of licence kept at the premises or plant</b>				
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	C	Site inspection	A hardcopy of the EPL was observed in the site office during the site inspection.	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	NT		Not relevant to the current audit period	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises	C	Site inspection	A hardcopy of the EPL was observed in the site office during the site inspection.  When queried a operator (leading hand) was aware of the location of the EPL.	
<b>G2</b>	<b>Other general conditions</b>				
G2.1	The licensee must establish a community environment liaison committee, comprising representatives of the community, the applicant, Parramatta City Council and Auburn Council that will meet at least quarterly. Representatives from relevant NSW Government agencies (including the Department of Planning and the Department of Environment and Climate Change) may be invited to attend meetings as required. Discussion at the meetings must include the progress in implementation of the development consent and other statutory approvals, and must provide adequate time for the community to raise matters of concern associated with the environmental impact of the development, with a view to achieving mutually satisfactory solutions.	C	<a href="https://www.veolia.com/au/our-services/our-facilities/transfer-stations/clyde-transfer-station">https://www.veolia.com/au/our-services/our-facilities/transfer-stations/clyde-transfer-station</a>	Since receipt of the conditions of consent Veolia has attempted to establish a Community Consultative Committee with little success. Therefore alternative measures have been proposed and approved by the DPIE, including: <ul style="list-style-type: none"> <li>● Publishing the community information phone line and email address on the Veolia's Corporate Website on the Clyde Transfer Terminal webpage.</li> <li>● Inviting community members to an Open Day at Clyde Transfer Terminal.</li> <li>● Creation of an email distribution list to engage with interested stakeholders on a routine basis communicating updates on activities on site.</li> <li>● Sending Clyde Transfer Terminal's Annual Environmental Monitoring Reports (AEMR) to Cumberland Council</li> </ul>	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
<b>8</b>	<b>SPECIAL CONDITIONS</b>				
<b>E1</b>	<b>Requirement to maintain financial assurance</b>				
E1.1	<p>(a) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA prior to 30 June 2015. The financial assurance must be in favour of the EPA in the amount of one hundred thousand dollars (\$100,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p> <p>(b) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by 30 June 2017. The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of two hundred thousand dollars (\$200,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person. Note that this total financial assurance is inclusive of that required in E1.1a).</p> <p>(c) The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by the Australian Prudential Regulatory Authority (APRA).</p>	C	Email records of financial assurance	Bank guarantees are maintained by the corporate office. Bank guarantee was received by the EPA in 2015 email observed verifying compliance.	
E1.2	The financial assurance must be maintained during the operation of the premises and thereafter until such time as the EPA is satisfied the premises are environmentally safe.	C	Email records of financial assurance	Bank guarantees are maintained by the corporate office. Bank guarantee was received by the EPA in 2015 email observed verifying compliance.	
E1.3	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed 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.	C	Email records of financial assurance	Bank guarantees are maintained by the corporate office. Bank guarantee was received by the EPA in 2015 email observed verifying compliance.	
E1.4	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	NT		Not relevant to the current audit period	
E1.5	The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: (a) the financial assurance required by condition E1.1; or (b) the adjusted financial assurance as required by condition E1.3 and E1.4.	C	Email records of financial assurance	Bank guarantees are maintained by the corporate office. Bank guarantee was received by the EPA in 2015 email observed verifying compliance.	
<b>E2</b>	<b>Environmental obligations of licensee (Works and Programs)</b>				

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
E2.1	While the licensee's premises are being used for the purpose to which the licence relates, the licensee must: (a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents. (b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. (c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.	C	Site Inspection, Emergency Response Plan - Clyde Transfer Terminal, Control of Non-Conforming Waste Procedure, CTT website	(a) No evidence of leak or spills of potential contaminants outside of the waste tipping floor was observed during the site inspection. Emergency Response Procedures for spills was observed. (b) Systems for identifying and removing non-conforming waste were observed during the audit. (c) All monitoring data was observed to be available on the CTT website.	
E2.2	After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must: (a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; (b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.	NT			
<b>E3</b>	<b>EPA may claim on a financial assurance</b>				
E3.1	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	NT		Not relevant to the current audit period	

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2020 Independent Environmental Audit  
Implementation of the OEMP and associated Sub-Plans**

Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
	<b>Operational Environmental Management Plan (OEMP) for Clyde Transfer Terminal</b>				
4.2.1	All employees receive suitable environmental training, to ensure they are aware of their responsibilities and are competent to carry out their work. The Induction Review Checklist provides details of induction aspects undertaken by all site personnel to ensure all induction requirements are met. Components of Veolia's general induction program are as follows: <ul style="list-style-type: none"> <li>● Veolia corporate induction via LMS online modules;</li> <li>● Veolia national Sustainability Awareness Program;</li> <li>● <del>Safety, health, environment and quality induction</del></li> </ul>	C	Induction Records, Training Records, Audit Interviews.	All records demonstrated adequate implementation of this section of the OEMP.	
4.2.2	In addition to the general induction, all employees (including subcontractors) receive site specific training covering the following: <ul style="list-style-type: none"> <li>● OEMP and related documents;</li> <li>● Site environmental objectives and targets;</li> <li>● Understanding individual authorities and responsibilities;</li> <li>● Significant project aspects, impacts and controls;</li> <li>● Potential consequences of departure from procedures;</li> <li>● Emergency procedure and response; and</li> <li>● <del>Understanding the legal obligations</del></li> </ul>	C	Toolbox on Odour and Spill Response, Work Instruction Training Records.	All records demonstrated adequate implementation of this section of the OEMP.	
4.3.2	Alternate measures listed below have been proposed and approved by the DPIE: <ul style="list-style-type: none"> <li>● Publishing the community information phone line and email address on the Veolia's Corporate Website on the Clyde Transfer Terminal webpage (<a href="https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station">https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station</a>) for all stakeholders to make enquiries, complaints or seek more information.</li> <li>● Inviting community members to an Open Day at Clyde Transfer Terminal including all parties that put submissions to the Development Consent modification application submitted in 2017.</li> <li>● Creation of an email distribution list to engage with interested stakeholders on a routine basis communicating updates on activities on site.</li> <li>● Sending Clyde Transfer Terminal's Annual Environmental Monitoring Reports (AEMR) to Cumberland Council.</li> </ul>	C	Site website, Stakeholder lists, and AEMRs	Veolia demonstrated the systems are available to achieve conformance with the commitments made to DPIE as listed in the OEMP.  Despite this, during the site inspection it was noted only 2 stakeholder contact details had been recorded on the site (including Boral and Manildra).	CTT-OEMP-OFI-01
4.4.2.1	Incident notification processes will reflect the extent of the event and the incident classification. Reporting will be in accordance with the Veolia NSW Incident Reporting Procedure as summarised in Figure 4.3 below. This procedure is used for the identification and reporting of hazards and/or incidents that have affected or have the potential to affect the environment or health and safety of a worker, contractor, subcontractor or a visitor to Veolia. Incidents are logged in The Vault and managed in the following sequence: <ul style="list-style-type: none"> <li>● Log incident;</li> <li>● Investigate incident;</li> <li>● Close incident;</li> </ul> Any notifiable environmental incidents or potential incidents associated with the CTT, with actual or potential significant impacts on people or the biophysical environment, will be notified as soon as practicable to DPIE, Auburn Council and other relevant agencies. This notification will be followed by a written report within 7 days of the incident.	C	Incident Records (Inc 10134680) & Incident Investigation Process Map	Incident investigation records supplied during the audit demonstrated conformance with this aspect of the OEMP.	
5.1.2	In the event that any monitoring results demonstrate an exceedance of a limit specified by COCs, Veolia undertakes the following measures: <ul style="list-style-type: none"> <li>● within 30 days of the monitoring, a report would be submitted to the Planning Secretary and Auburn Council which provides details of the exceedance including any reasons, actions, timeframes for any proposed actions, and results of additional monitoring; and</li> <li>● within seven (7) days of any action taken to meet the required limit, undertake further monitoring to demonstrate compliance with the limit.</li> </ul>	C	Audit Interviews	No exceedance was observed during the audit period.  It is noted the OEMP still makes reference to the now superceded Auburn Council.	CTT-OEMP-OFI-02

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
5.2	<p>Annual management reviews of the CTT OEMP and the environmental performance of the CTT will assess the continuing suitability, adequacy and effectiveness of the onsite environmental management measures implemented. The inputs to the management review process will include (but not be limited to):</p> <ul style="list-style-type: none"> <li>● internal and external audits findings;</li> <li>● incidents management and investigation of non-conformance events, incidents, near misses and management of all complaints received;</li> <li>● implementation of all compliance and legislative changes as identified at a corporate level; and</li> <li>● trend analysis on operational data.</li> </ul> <p>The output of management review will include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>● possible changes to the management plans, procedures, practices, objectives and targets associated with the environmental management of the CTT;</li> <li>● improvement of the effectiveness of the Veolia management system and its processes; and</li> <li>● resource needs.</li> </ul>	C	AEMR, Audit Interviews	Various meeting invites for management meetings that include discussion of environmental performance elements was observed. The wording of the OEMP section suggests there is a formal management review that is undertaken on an annual basis focusing on the continuing suitability, adequacy and effectiveness of the onsite environmental management measures implemented. During the audit it was identified there is no such process formally implemented.	CTT-OEMP-OFI-03
<b>Waste Management Plan (WMP) for Clyde Transfer Terminal</b>					
3.1.2	<p>The operation of the CTT includes receipt of solid waste from municipal, commercial and industrial sources within the Sydney Metropolitan Area (SMA) as follows:</p> <ul style="list-style-type: none"> <li>● Waste is accepted, weighed and unloaded on the tipping floor of the transfer terminal building, where screening for non-conforming waste is completed in accordance with the EPL.</li> <li>● The waste is pushed by front end loaders into compactors via a chute. Scales within the compactors are used to notify the operators of the weight of waste in real time.</li> <li>● The waste is then compacted and transferred from the compactor into a modified 40 foot shipping container with the use of a hydraulic ram.</li> <li>● Loaded shipping containers are transferred daily onto train wagons for transport via rail to the Crisps Creek Intermodal Facility (IMF), approximately 250 kilometres southwest of Sydney, in the Southern Tablelands.</li> <li>● Empty shipping containers are unloaded daily from train wagons.</li> </ul> <p><i>Procedures for the operation of plant and equipment on site, including front</i></p>	C	Site Inspection	No non-conformance with this section of the WMP was identified during the site inspection.	
4.1	All weighbridges on the site are National Measurement Institute (NMI) approved and maintained in proper working order and would be certified at least once a year in accordance with the Commonwealth National Measurement Act 1960.	C	Weighbridge calibration certificates (2020, 2019)  Compactor calibration certificates checks.	Inward and outbound calibration was observed during the audit.	
4.1.1	The weighbridge is the primary location on site for tracking waste, including monitoring the quantity, type and source of waste received on site, and the quantity, type and quality of the outputs produced on site.	C	Site Inspection	Waste tracking records were available within the weighbridge during the site inspection.	

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
4.2.2	<p>Hazardous, liquid and industrial waste would not be allowed at the site. The following non-conforming waste types are not accepted at the CTT:</p> <ul style="list-style-type: none"> <li>● Radioactive wastes;</li> <li>● Toxic wastes including any; <ul style="list-style-type: none"> <li>○ Material containing arsenic, cyanide or sulphide.</li> <li>○ Toxic soluble salts of the following metals: barium, boron, cadmium, copper, chromium, lead, manganese, mercury, selenium, silver or zinc.</li> </ul> </li> <li>● Pesticide or weedicide, in particular any of the following: <ul style="list-style-type: none"> <li>○ Chlorinated hydrocarbons.</li> <li>○ Fluorinated hydrocarbons.</li> <li>○ Organophosphates.</li> <li>○ Carbamates.</li> <li>○ Phenols.</li> </ul> </li> <li>● Soluble acid or alkali or acidic or basic compounds;</li> <li>● Liquid wastes;</li> <li>● Hazardous wastes e.g. Asbestos;</li> <li>● Any flammable liquid or material deriving from grease, oil, tar petroleum, shale or coal;</li> <li>● Any sludge or material (unless it can be shown to be innocuous and harmless) being the refuse from any industrial process carried out in any: <ul style="list-style-type: none"> <li>○ Tanning or leather processing plant.</li> <li>○ Petroleum or petrochemical plant.</li> <li>○ Chemical plant.</li> <li>○ Paint manufacturing plant.</li> <li>○ Metal treatment plant.</li> <li>○ Vegetable oil or mineral oil processing plant.</li> <li>○ Pharmaceutical or drug manufacturing plant.</li> <li>○ Medical and quarantine wastes; and</li> </ul> </li> </ul>	C	Site Inspection	No evidence of prohibited waste being accepted at the site was observed during the site inspection.	
4.3	<p>Where non conforming waste is detected, this waste would be separated from the general waste stream and set aside for removal offsite to a facility licensed to receive this type of waste for processing, recycling or disposal.</p> <p>In accordance with Condition of Development Consent 47(d), an education program has been developed to ensure all drivers accessing the site are inducted in the conditions of site entry. Details regarding this training program are provided in section 4.2.2 of the OEMP.</p> <p>The induction program is supported by the following measures:</p> <ul style="list-style-type: none"> <li>● Verbal advice from weighbridge operator;</li> <li>● Printed material to be handed to the driver at the weighbridge;</li> <li>● Spot checks by Facility Manager or EMR;</li> <li>● Tool box meetings; and</li> <li>● Site entry signage</li> </ul>	C	Site inspection	Facilities for the separation of common non-conforming wastes (including gas bottles and large metal pieces) was observed during the site inspection.	
4.4.1	<p>The induction program is supported by the following measures:</p> <ul style="list-style-type: none"> <li>● Verbal advice from weighbridge operator;</li> <li>● Printed material to be handed to the driver at the weighbridge;</li> <li>● Spot checks by Facility Manager or EMR;</li> <li>● Tool box meetings; and</li> <li>● Site entry signage</li> </ul>	C	Driver Induction program and audit Interviews	An induction program for drivers was observed during the audit. It was advised during the audit this is delivered to the customer via the Site Manager attending the site and delivering a train the trainers presentation.	
4.5.2	<p>Wind blown matters addressed by using the following controls:</p> <ul style="list-style-type: none"> <li>● All waste is unloaded within the terminal building</li> <li>● Daily litter patrols of the site are conducted by site personnel Results of the litter patrol, including corrective actions taken to ensure wind blown litter does not leave the premises, are recorded on the Weekly Site Inspection Checklist, which forms part of the BMS.</li> </ul>	C	Site Inspection	The site conformed with this section of the WMP during the site inspection.	

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification																				
5.1	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Item</th> <th style="text-align: left;">Type of Inspection / Testing</th> <th style="text-align: left;">Frequency of Inspection</th> <th style="text-align: left;">Responsibility</th> </tr> </thead> <tbody> <tr> <td>Weighbridge</td> <td>Certification and / or calibration</td> <td>Annual</td> <td>Plant Maintenance Supervisor</td> </tr> <tr> <td>Compactors 1 &amp; 2</td> <td>Calibration</td> <td>Annual</td> <td>Plant Maintenance Supervisor</td> </tr> <tr> <td>Waste volume monitoring - Storage on site - Annual limit</td> <td>- Inspection (waste on floor) - Tonnage data review</td> <td>Daily</td> <td>Facility Manager, Leading Hand(s)</td> </tr> <tr> <td>Site inspection and housekeeping checks</td> <td>Inspection</td> <td>Weekly</td> <td>Leading Hand or nominated person</td> </tr> </tbody> </table>	Item	Type of Inspection / Testing	Frequency of Inspection	Responsibility	Weighbridge	Certification and / or calibration	Annual	Plant Maintenance Supervisor	Compactors 1 & 2	Calibration	Annual	Plant Maintenance Supervisor	Waste volume monitoring - Storage on site - Annual limit	- Inspection (waste on floor) - Tonnage data review	Daily	Facility Manager, Leading Hand(s)	Site inspection and housekeeping checks	Inspection	Weekly	Leading Hand or nominated person	C	<p>Weighbridge calibration certificates (2020, 2019)</p> <p>Compactor calibration certificates checks.</p> <p>Weekly &amp; monthly checks RIVO</p>	<p>Calibration and inspection records were provided during the audit to demonstrate conformance.</p>	
Item	Type of Inspection / Testing	Frequency of Inspection	Responsibility																						
Weighbridge	Certification and / or calibration	Annual	Plant Maintenance Supervisor																						
Compactors 1 & 2	Calibration	Annual	Plant Maintenance Supervisor																						
Waste volume monitoring - Storage on site - Annual limit	- Inspection (waste on floor) - Tonnage data review	Daily	Facility Manager, Leading Hand(s)																						
Site inspection and housekeeping checks	Inspection	Weekly	Leading Hand or nominated person																						
<b>Odour Management Plan for Clyde Transfer Terminal</b>																									
3.1	A weather station has been installed on site, and will remain in place throughout the operation of the CTT. Dust measurements are accompanied by quantitative measurement of prevailing local weather conditions throughout the monitoring period.	C	Weather station records and Site inspection	Records for the weather station were provided during the audit. The weather station was observed during the site inspection.																					
4	<p>All works shall be made to conform to relevant regulations and guidelines for the handling of dust and to ensure emissions are minimised. These are:</p> <ul style="list-style-type: none"> <li>● Handling of the waste inside the CTT: All the waste received at CTT is handled inside the terminal building.</li> <li>● Odour impacts from waste received: a forced air extraction system in the transfer terminal building to capture and disperse odour emissions from the waste handling area, including the compactors area.</li> </ul>	C	Site Inspection	<p>During the site inspection all activities were observed to be undertaken within the terminal building, which had a forced air extraction system installed.</p> <p>Maintenance records for the air extraction system were also observed during the audit.</p>																					
4	<p>The following general operational measures have been implemented through to manage any potential source odour impacts associated with the operational phase of the CTT:</p> <ul style="list-style-type: none"> <li>● The terminal building is enclosed, with the exception of vehicle access openings and an air extraction system.</li> <li>● The air extraction system services the waste handling area within the terminal building so as to manage odour through a single exhaust point.</li> <li>● Plastic strips installed on the doorways will help contain odour within the terminal building.</li> <li>● Containers used for the transport of waste have been purpose built for the CTT. They include activated carbon filtration packs fitted to the air exhaust vent on the container as well as rubber seals to help contain odour.</li> </ul>	C	Site Inspection	<p>The following was observed during the site inspection:</p> <ol style="list-style-type: none"> <li>1. Terminal was enclosed with the exception of the vehicle access opening.</li> <li>2. The air extraction system was observed (however operation was unable to be verified on the day).</li> <li>3. Plastic strips were installed at the doorways.</li> <li>4. Containers were sealed and included filtration packs.</li> </ol>																					
4.1.6	Maintenance schedule for odour control system and ventilation equipment is carried out typically in accordance with the manufacturer's specification and includes monthly mechanical maintenance. Regular inspections are undertaken as per the CTT Environmental Inspection & Testing Schedule, included in section 5.1.1 of the OEMP.	C	Maintenance Records (Sept 20 & Oct 20) & Maintenance Register	A maintenance schedule and associated completed maintenance records were provided during the audit.																					
5.1	<p>The following information is also collected and can be correlated with the general monitoring information to provide a better understanding of site conditions relevant to odour management:</p> <ul style="list-style-type: none"> <li>● automatic weather monitoring station data, including temperature, wind speed and direction;</li> <li>● odour emission rate data;</li> <li>● details regarding odorous loads including time, date and nature of waste pollution complaints register information</li> <li>● weighbridge information relating to incoming waste, including type, time and weight; and compactor information relating to compacted waste, including time and weight for each load.</li> </ul>	C	Audit Interviews, Site Inspections, Monitoring Data, Waste Records, Complaint Register	The information required under this section was available and verified during the audit.																					

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification				
5.1.5	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #4CAF50; color: white;">Action</th> <th style="background-color: #4CAF50; color: white;">Schedule</th> </tr> </thead> <tbody> <tr> <td>Odour auditing of premises and nearby receivers</td> <td>Ongoing 6-monthly</td> </tr> </tbody> </table>	Action	Schedule	Odour auditing of premises and nearby receivers	Ongoing 6-monthly	C	Clyde Waste Transfer Terminal Odour Audit XXXIII - XXXV  Annual Environmental Management Report - Clyde Transfer Terminal	Odour audit records were observed and verified during the audit.	
Action	Schedule								
Odour auditing of premises and nearby receivers	Ongoing 6-monthly								
<b>Dust Management Plan for Clyde Transfer Terminal</b>									
4	<p>Mitigation measures have been incorporated into the design of the CTT facility to minimise the risk and consequences associated with the key dust management issues. All works shall be made to conform to relevant regulations and guidelines for the handling of dust and to ensure emissions are minimised. These are:</p> <ul style="list-style-type: none"> <li>● Handling of the waste inside the CTT: All the waste received at CTT is handled inside the terminal building; and</li> <li>● Dust emissions from handling of waste: if required, the deluge system inside the terminal building can be used as a dust suppression system during dust generating activities.</li> </ul>	C	Site Inspection	During the site inspection all waste handling was observed within the building. Suitable dust management measures were observed.					
4	<p>The following general operational measures have been implemented through to manage any potential source of dust impacts associated with the operational phase of the CTT:</p> <ul style="list-style-type: none"> <li>● The terminal building is enclosed, with the exception of vehicle access openings and an air extraction system.</li> <li>● Dust generated from waste is to be managed by the deluge system, located within the transfer building, if required.</li> <li>● Plastic strips installed on the doorways will help contain odour and dust within the terminal building.</li> <li>● Containers used for the transport of waste have been purpose built for the CTT. The waste is completely enclosed and sealed during transportation.</li> </ul>	C	Site Inspection	<p>The following was observed during the site inspection:</p> <ol style="list-style-type: none"> <li>1. Terminal was enclosed with the exception of the vehicle access opening.</li> <li>2. A deluge system was available although unlikely to be required.</li> <li>3. Plastic strips were installed at the doorways.</li> <li>4. Containers were sealed and included filtration packs.</li> </ol>					
4.1	In the event of any adverse meteorological conditions and extraordinary events during the operational stage likely to impact air quality, an incident specific risk assessment will be undertaken to devise suitable control measures. This process may also result in work ceasing on site until adverse weather conditions subside, if it is not practical to implement suitable control measures.	C	Audit Interviews	No evidence of non-conformance with this section was observed during the audit. However, responses from audit interviews demonstrated there is no specific system for assessing adverse meteorological conditions has been established. Site personnel were unsure what would constitute adverse meteorological conditions that would trigger the incident specific risk assessment.	CTT-OEMP-OFI-04				
5.1	Visual assessment of dust levels are undertaken on site through daily walk arounds by site personnel and completion of housekeeping inspections.	C	Audit Interviews	It was confirmed during interviews that daily walk arounds would identify dust migration, although dust is not a major issue with the type of waste that is being received at the facility.					
<b>Traffic Management Plan for the Clyde Transfer Terminal (TMP)</b>									
4.1.1	Entering or exiting the CTT site is via a left turn from the slip lane on Parramatta Road, into the sealed right of carriageway. Arrangements have been made with neighbouring users, in regard to traffic sharing on the right of carriageway. 12.5m rigid waste trucks are not permitted to turn right into the site entrance until intersection upgrade works have been completed to the satisfaction of Cumberland Council and Roads and Maritime Services (RMS). Access to the site from Rawson Street is not allowed.	C	Site Inspection, Driver Induction	No evidence of right turns from or to Parramatta Road were observed during the site inspection. This was also observed to be covered in the driver induction and on signage at the site entrance.					
4.1.3	Heavy Vehicle drivers are required to be inducted prior to entering the site. The induction covers all the site rules, weighbridge usage and site transport management procedures.	C	Driver Induction	The driver induction addressed this section of the TMP.					

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent Audit Findings	Unique Identification
4.1.3	The education program is supported by the following measures: <ul style="list-style-type: none"> <li>● Signage posted, advising allowable entry/exit movements as shown in Appendix B, and including: <ul style="list-style-type: none"> <li>○ Exit to Parramatta Road;</li> <li>○ Administration areas;</li> <li>○ Weighbridge; and</li> <li>○ On Parramatta Road (for "right turn in" movement).</li> </ul> </li> <li>● Instructions from weighbridge staff advising allowable entry</li> </ul>	C	Site Inspection	Signage at the front of the Site included instruction on advising allowable entry and exit movements as required under this section.	
<b>Vermin and Pest Control Plan for Clyde Transfer Terminal</b>					
4.1	All buildings and equipment are maintained in such a manner that will not encourage the presence of pests. Efforts shall be taken to prevent access to insects, birds and rodents, as well as steps to remove them when their presence has been detected.	C	Site Inspection	Suitable measures to minimise the attraction of pests were observed during the site inspection.	
4.1.4	The pest controller is required to use approved chemicals only. A list of chemicals proposed and Safety Data Sheet (MSDS) for each are submitted and approved prior to use by the contractor.	C	Site inspection	Approved SDSs for chemicals used by pest controller were observed during the audit.	
5.1	Pest and vermin inspections are undertaken on a quarterly basis by an external contractor and treated with baits or spray as required. Inspections are also undertaken on a routine basis by the CTT's operators, as part of general housekeeping and recorded on relevant housekeeping and inspection checklists.	C	Quarterly Pest & Vermin Reports	Inspections were observed and conformant with these requirements.	
<b>Stormwater Management Plan for Clyde Transfer Terminal (SMP)</b>					
4.1.1	Gross pollutants are minimised through routine litter patrols and housekeeping of the site perimeter for wind blown material.	C	Site Inspection	The site was observed to be in a clean condition at the time of inspection.	
4.2	The leachate management system is independent of the stormwater system, ensuring that separation between rainfall run-off and leachate is maintained. The gradient of the waste shed floor leads to the Compactor chutes. Therefore, as soon as waste is tipped any associated liquids (leachate) is captured in the leachate system. Leachate generated during compaction and associated equipment cleaning water is captured in the leachate system tank. The leachate tank has a capacity of 32kL and is located in the north-western end of the Compactor area. All leachate from the tipping floor, compacting <del>operations and compactor wash-down water is captured in the tank.</del>	C	Site Inspection	The leachate management system was observed to be independent of the stormwater system and in conformance with the SMP.	
4.3	The design of the CTT facility includes a self-bunded diesel storage tank. All refuelling takes place in close proximity to the tank. The pump has an automatic cut off in case of hose failure and spill control materials are available in plentiful supply in the area.	C	Site Inspection	A self-bunded diesel tank was observed.	
3.1.3	Surface water runoff from the Container Storage hardstand, Compactor Apron and car park are processed through the Pond 1 First Flush system, which is divided into three sections.	C	Site Inspection	The site inspection confirmed site grades are in accordance with the SMP.	
5.1.1	Inspection of the stormwater treatment system is carried out on a regular basis and after significant rainfall events. Debris is removed when identified by inspection, or on a programmed basis. Any material accumulated within the retention basin or the silt/oil chamber is removed manually or by high suction vacuuming and disposed of in an approved manner.	C	Site Inspection, Audit Interviews	Records for inspection and maintenance of the stormwater treatment system were observed. During the site inspection the first flush system appeared to be well maintained.	
<b>Site Contamination Management Plan for Clyde Transfer Terminal</b>					
4.1.1	The following information in relation to the storage, treatment and disposal of waste is recorded in accordance with EPA requirements: <ul style="list-style-type: none"> <li>● Amount and type of waste transported;</li> <li>● Name and licence plate number of the transporter;</li> <li>● Date of transportation; and</li> <li>● Name and location of the receiving waste facility.</li> </ul>	NT		Not relevant to the current audit period	

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4.1.4	The surface of the site has been sealed to minimise the potential disturbance of groundwater and groundwater will not be utilised for any aspect of the operation. In accordance with the site auditor recommendations, groundwater will not be abstracted for use without ascertaining that it is suitable for the proposed use.	NT		Not relevant to the current audit period	
<b>Environmental Monitoring Program for Clyde Transfer Terminal</b>					
2	Review the monitoring schedule and seek evidence of completed.	C	All monitoring reports	All monitoring records were observed and up to date.	
<b>Emergency Response Plan - Clyde Transfer Terminal</b>					
4.1	Hard copies of the ERP are available in the Terminal's site and weighbridge offices, which is communicated to all relevant site workers during training in the requirements of the ERP.	C	Site inspection	Hardcopies of the ERP were available at the terminals weighbridge.	
4.2	The ERP will as a minimum be tested annually in accordance with the Emergency Response Procedure and requirements of the PIRMP Guidelines. The ERP must also be tested within one month of any pollution incident occurring. Records of any testing conducted will be maintained. The Incident/Emergency/Crisis Log Template can be used and the corrective actions logged in Rivo as an ad hoc inspection.	C	Site inspection, Sphera Cloud Records, Emergency/Crisis Scenario Record	ERP test records for 2020 were observed during the audit.	

## APPENDIX G – SITE INSPECTION PHOTOS



**Plate 1: Spikes installed at weighbridge to detract birds landing**



**Plate 2: Netting on the roof of the terminal building to detract birds landing**



**Plate 3: Clean housekeeping container storage**



**Plate 4: Good housekeeping weighbridge area**



**Plate 5: First flush stormwater system**



**Plate 6: Street sweeper available on-site**



**Plate 7: Waste container fitted with activated carbon filter**



**Plate 8: Facilities for removal of non-conforming waste (gas bottles)**



The Epic team provides a wide range of skills and experience on numerous environmental management issues, across a wide range of public, commercial and industrial projects. At Epic, we focus on the practical aspects of environmental planning, engineering and science, offering comprehensive services in:

- Strategic advice and project support;
- Contaminated site assessment, management and remediation;
- Asbestos assessment and advisory;
- Naturally Occurring Radiological Material assessment and management;
- Contaminated land auditing services (QLD –Contaminated Land Auditor; NSW – Contaminated Site Auditor);
- Statutory planning and impact assessment covering QLD, NSW and Commonwealth legislation;
- Environmental approvals and permitting – full array;
- Ecological (fauna, flora and habitat) site assessments;
- Site suitability assessments;
- Environmental offset assessments and development of management strategies;
- Waste auditing and management;
- Landfill design and management;
- Compliance and auditing;
- Erosion sediment control; and
- Hydrogeology.

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