

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

Prepared by  
**Ramboll Australia Pty Ltd**

Date  
**20 December 2018**

Project Number  
**318000580**

# **2018 INDEPENDENT ENVIRONMENTAL AUDIT VEOLIA CAMELLIA MATERIALS RECYCLING FACILITY**

## **2018 INDEPENDENT ENVIRONMENTAL AUDIT VEOLIA CAMELLIA MATERIALS RECYCLING FACILITY**

Revision **Final 1**  
Date **20 December 2018**  
Made by **Emily Rowe and David Ford**  
Checked by **Victoria Sedwick**  
Approved by **Victoria Sedwick**  
Description **2018 Independent Environmental Audit of Veolia  
Camellia Materials Recycling Facility**  
Ref: **318000580**

This document is issued to Veolia Environmental Services (Australia) Pty Ltd for the purposes of an Independent Environmental Audit of Veolia Camellia Materials Recovery Facility. It should not be used for any other purpose.

Whilst reasonable attempts have been made to ensure that the contents of this report are accurate and complete at the time of writing, Ramboll Australia Pty Ltd disclaims any responsibility for loss or damage that may be occasioned directly or indirectly through the use of, or reliance on, the contents of this report.

© Ramboll Australia Pty Ltd

Ramboll  
Level 3, 100 Pacific Highway  
PO Box 560  
North Sydney NSW 2060

T +61 2 9954 8100  
[www.ramboll.com](http://www.ramboll.com)

318000580

SSD\_4969\_Camellia\_MRF\_IEA\_Ramboll\_318000580\_Final\_20Dec18

Ramboll

## CONTENTS

<b>1.</b>	<b>EXECUTIVE SUMMARY</b>	<b>1</b>
<b>2.</b>	<b>INTRODUCTION</b>	<b>2</b>
2.1	Background	2
2.2	Audit Team	2
2.3	Audit Objectives	2
2.4	Audit Scope	2
2.5	Audit Period	3
<b>3.</b>	<b>AUDIT METHODOLOGY</b>	<b>3</b>
3.1	Selection and Endorsement of Audit Team	3
3.2	Independent Audit Scope Development	3
3.3	Compliance Evaluation	3
3.4	Site Inspection and Interviews	3
3.5	Consultation	3
3.6	Compliance Status Descriptors	4
<b>4.</b>	<b>AUDIT FINDINGS</b>	<b>4</b>
4.1	Approval and Document List	4
4.2	Compliance Performance	6
4.3	Summary of Agency Notices, Orders, Penalty Notices or Prosecutions	7
4.4	Previous Audit Recommendations	7
4.5	EMP, Sub-plans and Post Approval Documents	7
4.6	EMS	7
4.7	Environmental Performance	7
4.8	Complaints	7
4.9	Incidents	7
4.10	Actual Verses Predicted Environmental Impacts	8
4.11	Site Inspection	8
4.12	Site interviews	8
4.13	Previous Annual Review or Compliance Report Recommendations	8
4.14	Improvement Opportunities	8
4.15	Key Strengths	8
<b>5.</b>	<b>RECOMMENDATIONS AND OPPORTUNITIES FOR IMPROVEMENT</b>	<b>9</b>
5.1	Recommendations in Relation to Non-compliances	9
5.2	Recommendations in Relation to Opportunities for Improvement	9
<b>6.</b>	<b>CONCLUSIONS</b>	<b>9</b>

## APPENDICES

### Appendix A

Independent Audit Tables

### Appendix B

Planning Secretary Audit Team Agreement

### Appendix C

Independent Audit Declaration Form

### Appendix D

Site Inspection Photographs

## GLOSSARY

AEMR	Annual Environmental Management Report
CEMP	Construction Environmental Management Plan
DPE	NSW Department of Planning & Environment
EIS	Environmental Impact Statement
EMS	Environmental Management System
ENM	Excavated Natural Material
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
FERMP	Flood Emergency Response Management Plan
ICNG	Interim Construction Noise Guideline
IEA	Independent Environmental Audit
ISO	International Organisation for Standardisation
MRF	Materials Recycling Facility
NSW	New South Wales
PIRMM	Pollution Incident Response Management Manual
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations (Act)
RAP	Remedial Action Plan
RTS	Response to Submissions Report
SSD	State Significant Development
VENM	Virgin Excavated Natural Material
WMP	Water Management Plan
WMS	Water Management System

## 1. EXECUTIVE SUMMARY

Veolia Environmental Services (Australia) Pty Ltd (Veolia) engaged Ramboll Australia Pty Ltd (Ramboll) to conduct an Independent Environmental Audit (the Audit) of the Camellia Materials Recycling Facility. Veolia is developing the Materials Recycling Facility (MRF) at 37 Grand Avenue, Camellia, New South Wales (NSW). When operational, the MRF will be capable of processing 200,000 tonnes of general solid waste from the commercial and industrial sector. The MRF was approved as State Significant Development under Development Consent SSD 4964 and holds Environment Protection Licence (EPL) 4806. The Independent Environmental Audit (IEA), is required under Condition C9 of Development Consent SSD 4964.

Demolition of the former waste facility (except for three bunded above ground tanks in the south western corner of the site) and contamination remediation works had been completed under previous consents issued by Parramatta City Council.

Development of the MRF under Development Consent SSD 4964 and EPL 4806 is being carried out in two stages comprising:

- Stage 1 - Preloading of the site; and
- Stage 2 - Construction of the MRF.

At the time of this Audit, preloading of the site (Stage 1) had been completed and no activities were being undertaken at the site other than periodic inspections and monitoring. Construction of the MRF (Stage 2) had not commenced.

This is the first Independent Environmental Audit for this development. The Audit Period is from the issue of Development Consent SSD 4964 on 6 July 2016 to the date of the Audit site visit, 31 October 2018. The Audit Period includes the period covered by the first Annual Environmental Management Report (AEMR) for the development (July 2017 to July 2018).

The Auditors assessed the development to be generally compliant with the conditions of Development Consent SSD 4964 and EPL 4806. Four non-compliances were identified, which are considered to be of an administrative nature. Several opportunities for improvement were also identified. Management systems and environmental performance of the development are considered to be adequate for the stage of development. The four non-compliances identified were:

SSD 4964 Condition B7 – Revision 2 of the Stage 1 Water Management Plan (WMP) had not been submitted to the NSW Department of Planning & Environment (DPE) for approval. The Auditors note that this revision (May 2018) has provided additional information and is generally consistent with the previous revision (December 2016). Revision 2 has subsequently been submitted to the DPE. The latest revision should be made publically available following approval.

SSD 4964 Condition C9 – The Independent Environmental Audit was not commissioned within 1 year of the commencement of Stage 1 preloading works. The Auditors note that this non-compliance has been rectified by commissioning of this Audit and that the DPE has been kept informed of the timing. No recommendation on further corrective action is made.

EPL 4806 Condition O4.1 – Veolia has a state-wide Pollution Incident Response Management Manual (PIRMM) and site incident response procedures as part of the Construction Environmental Management Plan (CEMP); however, not all of the requirements of a Pollution Incident Response Management Plan (PIRMP) under the legislation are met. It is recommended that plans be updated to meet all PIRMP requirements under the legislation. Although there are currently no buildings at the site and site is unattended, it is recommended that a copy of the updated plan(s) be kept at the site to satisfy the requirement of the legislation.

EPL 4806 Condition G1.1 – A copy of EPL 4806 was not kept at the site. Although there are currently no buildings at the site and site is unattended, it is recommended that a copy of the EPL be kept at the site to satisfy the requirement of the licence.

## 2. INTRODUCTION

### 2.1 Background

Veolia Environmental Services (Australia) Pty Ltd (Veolia) engaged Ramboll Australia Pty Ltd (Ramboll) to conduct an Independent Environmental Audit (the Audit) of the Camellia Materials Recycling Facility. Veolia is developing the Materials Recycling Facility (MRF) at 37 Grand Avenue, Camellia, New South Wales (NSW). When operational, the MRF will be capable of processing 200,000 tonnes of general solid waste from the commercial and industrial sector. The MRF was approved by the Planning Assessment Commission of New South Wales as State Significant Development under Development Consent SSD 4964 and holds Environment Protection Licence (EPL) 4806 issued by the NSW Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act). The Independent Environmental Audit (IEA), is required under Condition C9 of Development Consent SSD 4964.

Demolition of the former waste facility (except for three bunded above ground tanks in the south western corner of the site) and contamination remediation works had been completed under previous consents issued by Parramatta City Council.

Development of the MRF under Development Consent SSD 4964 and EPL 4806 is being carried out in two stages comprising:

- Stage 1 - Preloading of the site; and
- Stage 2 - Construction of the MRF.

At the time of this Audit, preloading of the site (Stage 1) had been completed and no activities were being undertaken at the site other than periodic inspections and monitoring. Construction of the MRF (Stage 2) had not commenced.

### 2.2 Audit Team

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

### 2.3 Audit Objectives

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

### 2.4 Audit Scope

The scope for the Audit is taken from Condition C9 of Development Consent SSD 4964 as follows:

*C9. Within 1 year of the date of this consent and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:*

- a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary;*
- c) include consultation with the relevant agencies;*
- d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals);*
- e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and*

- f) *recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.*

As required under part d) of Condition C9, the Audit also assessed compliance against EPL 4806.

## **2.5 Audit Period**

This is the first Independent Environmental Audit for this development. The Audit Period is from the issue of Development Consent SSD 4964 on 6 July 2016 to the date of the Audit site visit, 31 October 2018. The Audit Period includes the period covered by the first Annual Environmental Management Report (AEMR) for the development (July 2017 to July 2018).

## **3. AUDIT METHODOLOGY**

### **3.1 Selection and Endorsement of Audit Team**

All of the Ramboll Auditors referred to in Section 2.2 have training and extensive experience in conducting environmental compliance audits and are independent from Veolia. Victoria Sedwick is a certified Lead Auditor with Exemplar Global (Certificate No. 13180). The Audit Team was endorsed by the NSW Department of Planning and Environment (DPE) in a letter dated 23 August 2018 (**Appendix B**).

### **3.2 Independent Audit Scope Development**

The scope for the Audit was developed to assess the development's environmental performance in relation to each condition of Development Consent SSD 4964 and EPL 4806, which included all post approval documents prepared to satisfy the conditions relevant to the current stage of development.

### **3.3 Compliance Evaluation**

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

- Site inspection of 37 Grand Avenue, Camellia, which included the taking of photographs;
- Review of documents, reports and other records including approvals, licences, reports prepared to satisfy the conditions, site inspection checklists, site plans and drawings, as well as Veolia's correspondence with agencies including the DPE and the EPA;
- Interviews of site personnel (refer Section 3.4);
- Calling the "community phone line" number provided in the CEMP; and
- Review of documents posted on the internet including Veolia, EPA and DPE websites.

### **3.4 Site Inspection and Interviews**

The development at 37 Grand Avenue, Camellia was inspected by the Auditors (David Ford and Emily Rowe) on 31 October 2018. There were no inaccessible areas. The following Veolia personnel were interviewed on the same day and accompanied the Auditors during the site inspection:

- Amandeep Brar, Environmental Planner, NSW State Office
- Promit Biswas, Senior Project Manager, NSW State Office
- Sara Maddison, Operations Project Manager, NSW Resource Recovery

### **3.5 Consultation**

The DPE was consulted concerning the application of the DPE's *Independent Audit Post Approval Requirements* (June 2018) to this Audit.

The DPE was also consulted concerning the Audit findings for Development Consent SSD 4964 conditions B7 and C9.

### 3.6 Compliance Status Descriptors

Although not specifically referenced in Development Consent SSD 4964, this Audit Report has been prepared generally in accordance with the DPE's *Independent Audit Post Approval Requirements* (June 2018). As such, the following compliance status descriptors have been used:

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

The following additional compliance status descriptor has been used on a small number of occasions where the Auditors consider it is justified and have provided some explanation.

Not verified	The auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of sufficient verification the auditor may in some instances be able to ascertain by other means (e.g. personal communication by the proponent) that a requirement has been met but it cannot be independently substantiated. In such a situation, the requirement should still be assessed as not verified. However, the auditor could note in the report that they have no reasons to believe that the operation is non-compliant with that requirement.
--------------	--

Observations have also been made that identify opportunities for improvement.

## 4. AUDIT FINDINGS

### 4.1 Approval and Document List

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

- Development Consent SSD 4964<sup>1</sup>
- EPL 4806<sup>2</sup>
- Construction Environmental Management Plan – Preloading, 37 Grand Avenue Camellia, November 2016 (refer Note 1)
  - Appendix B: Camellia Materials Recycling Facility Water Management Plan, Phases 1A and 1B – Temporary Water Management System, 17006-R01 Revision 0, 20 September 2016
- Camellia Materials Recycling Facility Water Management Plan, Stage 1, Temporary Water Management Plan, 17006-R01 Revision 2, 7 May 2018
- Annual Environmental Management Report, Camellia Materials Recycling Facility, 37 Grand Avenue Camellia, September 2018 (refer Note 1)

---

<sup>1</sup> Available on Veolia's website - <https://www.veolia.com/anz/our-services/services/municipal-residential/recovering-resources-waste/camellia-recycling-centre>

<sup>2</sup> Available on Veolia's website - <https://www.veolia.com/anz/our-services/services/municipal-residential/recovering-resources-waste/camellia-recycling-centre>

- Veolia, NSW Pollution Incident Response Management Manual, 1 January 2018<sup>3</sup>
- Annual Return, Veolia Environmental Services (Australia) Pty Ltd, Licence 4806, unsigned copy of electronic submission
- Letter from DPE to Veolia regarding Camellia Resource Recovery Facility – SSD 4964 Annual Environmental Management Report 2017/18, 21 September 2018
- Letter from DPE to Veolia regarding Camellia Materials Recycling Facility (SSD 4964), Progressive Submission of Management Plans and Approval of Management Plans for Stage 1 Construction (Pre-Loading) Works, 23 May 2017
- Letter from DPE to Veolia regarding Camellia Resource Recovery Facility (SSD 4964) – Endorsement of Independent Environmental Auditors, 23 August 2018
- Letter from Select Civil to Residents and Property Owners Re: 37 Grand Avenue site Re-development Earthworks, 18 July 2017
- Elite Survey, Final Site Survey, Site Volume Calculation, Monitoring Point Locations, Drawing No. ES-SELECT CIVIL-VEOLIA CAMELLIA-DRG-001, Rev. 0, 14/09/2017
- Elite Survey, Topographical As Built of Existing Surface, Drawing No. ES-SELECT CIVIL-VEOLIA CAMELLIA-DRG-004, Rev. 0, 22/08/2018
- Consult.In Pty Ltd, Phase 1C and 1D Bulk Earthworks Layout Plan, Camellia Materials Recycling Facility, 37 Grand Avenue, Camellia, Drawing Number 17006-1015, Revision 3
- Ramboll Environ Australia, Letter to CPB Samsung John Holland Joint Venture, Re: VENM Classification – Northcote Street Tunnel Site and Associated Tunnelling, 19 September 2016
- ADE Consulting Group, Waste Analysis & Classification Report, Northcote Tunnelling Site, Northcote Street, Haberfield NSW, WCX-03-11095 / WAC1 / v2 final, 19 September 2016
- Letter from SLR Consulting Australia Pty Ltd to Veolia regarding Camellia Background Noise Monitoring, 10 August 2017
- Email from Veolia to DPE regarding Camellia Material Recycling Facility (SSD 4964) – Independent Environmental Audit, 21 September 2018
- Email with attached letter from Veolia to DPE regarding Update- Reporting Requirements - SSD 4964 (Camellia Material Recycling Facility) for Conditions C9, C10 and C11, 28 July 2017
- Email correspondence between Veolia and the EPA during the period from 28 February to 13 March 2018 regarding an onsite basin overflow event observed by the EPA on 28 February 2018.
- Veolia, Site Environmental Inspection Report template for 'Camellia Pre-load' project
- Completed Site Environmental Inspection Reports for:
  - 09-08-2018
  - 11-09-2018
  - 08-10-2018
  - 13-11-2018

---

<sup>3</sup> Available on Veolia's website -[https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2018/03/NSW\\_Pollution\\_Incident\\_Response\\_Management\\_Manual.pdf](https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2018/03/NSW_Pollution_Incident_Response_Management_Manual.pdf)

- ALS Environmental Certificate of Analysis, ES1807459, for sample CAM-SUMP collected on 12 March 2018
- ALS Environmental Certificate of Analysis, ES1807507, for samples CAM-SUMP and CAM-HARDSTAND collected on 13 March 2018
- Email from Veolia to DPE regarding Final CEMP for Preloading, 23 December 2016
- Letter from DPE to Veolia regarding Camellia Materials Recycling Facility (SSD 4964) – Independent Environmental Audit, 17 December 2018
- Email from Veolia to DPE regarding Revision 2 of the Stage 1 WMP, 19 December 2018

## 4.2 Compliance Performance

The Auditors assessed the development to be compliant with Development Consent SSD 4964 and EPL 4806 except for the following non-compliances. Refer to Section 5.1 for recommended actions. Refer to the Independent Audit Tables (**Appendix A**) for full details of the identified non-compliances and compliance status of other conditions.

### NON-COMPLIANCES

SSD 4964 Condition B7 – Revision 2 of the Stage 1 Water Management Plan (WMP) had not been submitted to the DPE for approval. The Auditors note that this revision (May 2018) has provided additional information and is generally consistent with the previous revision (December 2016). Revision 2 has subsequently been submitted to the DPE.

SSD 4964 Condition C9 – The Independent Environmental Audit was not commissioned within 1 year of the commencement of Stage 1 preloading works. The Auditors note that this non-compliance has been rectified by commissioning of this Audit and that the DPE has been kept informed. No recommendation on further corrective action is made.

EPL 4806 Condition O4.1 – Veolia has a state-wide Pollution Incident Response Management Manual (PIRMM) and site incident response procedures as part of the CEMP; however, not all of the requirements of a Pollution Incident Response Management Plan (PIRMP) under the POEO Act are met.

EPL 4806 Condition G1.1 – A copy of EPL 4806 was not kept at the site.

### NOT-VERIFIED:

SSD 4964 Condition B18 and EPL 4806 Condition O3.2 – The Auditors were unable to verify that vehicles utilised during the pre-loading works adhered to speed limits; kept loads covered at all times except during loading and unloading; and were cleaned prior to leaving site to prevent tracking of dirt, sand or other materials on public roads, as that work had been completed prior to the site visit. However, the Auditors have no reason to believe the condition has not been complied with.

SSD 4964 Condition B22 and EPL 4806 Condition L4.1 – The Auditors were unable to verify that construction hours were adhered to during the pre-loading works as that work had been completed prior to the site visit. A letter to residents and property owners from the pre-loading contractor dated 18 July 2017 advised residents of the construction hours, which were consistent with Condition B22. Furthermore, there were no reported community complaints. The Auditors have no reason to believe the condition has not been complied with.

SSD 4964 Condition B26 – The Auditors were unable to verify that vibration resulting from the construction activities complied with the vibration criteria specified in Condition B26 as that work had been completed prior to the site visit. Veolia advised that vibrating rollers were not used during pre-loading and that no vibration monitoring had been undertaken. The Auditors have no reason to believe the condition has not been complied with.

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

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

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

There are no previous audit recommendations for this development.

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

The Auditors consider the Construction Environmental Management Plan (CEMP), WMP and Flood Emergency Response Management Plan (FERMP) for Stage 1 to be adequate. A number of opportunities for improvement are identified in Section 4.14.

#### **4.6 EMS**

Veolia has a National Integrated Management System (NIMS) that is certified to ISO 14001. At present, there is no site specific Environmental Management System (EMS) other than the plans prepared for Stage 1 preloading. Given the stage of development of the site, the Auditors consider management systems to be generally appropriate.

#### **4.7 Environmental Performance**

Veolia has completed the first AEMR for the development, covering the period July 2017 to July 2018. The AEMR provided background to the development as well as a summary of performance for the reporting period. No significant issues or non-compliances were reported.

Management systems and environmental performance of the development are considered by the Auditors to be adequate for the stage of development. The Auditors made following observations in relation to the environmental performance of the development:

Onsite basin overflow event observed by the EPA on 28 February 2018 – The EPA emailed Veolia on 28 February 2018 to advise that they had observed “that the south western quarter of the site [was] flooded with water spilling through the containment wall”. The EPA requested that Veolia advise whether there was a water management plan in place and if so, what actions were required and by when, and whether the volume of ponded water was in line with the current contamination management plan/RAP. Veolia responded to the EPA via emails on 8, 9 and 13 March 2018 and advised that the ponding was due to a failed stormwater sump pump switch that was subsequently reset and the pump reactivated. Veolia responded to all of the EPA’s questions. The Auditors understand there was no further action required by the EPA.

Veolia sampled and analysed water from the stormwater sump pit on 12 and 13 March 2018 and a sample from the hardstand adjacent to the pit. The samples were analysed for pH, Electrical Conductivity and Total Suspended Solids, as reported in the AEMR, and for hexavalent chromium. No hexavalent chromium was detected in the water samples, confirming that the ponded stormwater had not been impacted by contaminated fill under the hardstand. Laboratory Certificates of Analysis were provided to the Auditors.

Noise monitoring – SLR Consulting Australia Pty Ltd carried out an unattended ambient noise survey between 18 and 26 July 2017, prior to commencement of pre-loading activities. The survey was for the purpose of background noise monitoring and was conducted at locations near to those specified in EPL 4086 due to property access constraints. SLR compared noise limits in the EPL to those that would apply in accordance with the EPA’s Interim Construction Noise Guideline (ICNG). SLR concluded that the EPL noise limits were significantly lower than those that would be determined in accordance with the ICNG.

#### **4.8 Complaints**

No complaints have reportedly been received in relation to the development.

#### **4.9 Incidents**

No incidents have reportedly occurred to date during the course of the development works.

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

There have been no significant or reportable environmental impacts. The Auditors have not identified inconsistencies between actual environmental impacts and the predicted environmental impacts.

#### **4.11 Site Inspection**

The Auditors carried out a site inspection on 31 October 2018 accompanied by the Veolia personnel referred to in Section 3.4. Photographs taken during the site visit are provided in **Appendix D**.

#### **4.12 Site interviews**

As there are no buildings at the site, a meeting was held at Veolia's Rosehill office on the day of the site visit that involved the Auditors and the Veolia personnel referred to in Section 3.4. Information regarding the history of the site and the development was provided and documents and records were reviewed. Further information was later provided on request via email.

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

No non-compliances or complaints were identified in the AEMR and no recommendation were made.

#### **4.14 Improvement Opportunities**

The following area have been identified as opportunities for improvement. Refer to Section 5.2 for recommended actions.

Development Consent SSD 4964 and EPL 4806 require a number of actions that are triggered by timing or development milestones. Veolia has an environmental compliance program which includes the function of calendar alerts. The environmental compliance program was developed primarily for operational sites and may not be ideally suited for a construction project.

SSD 4964 Condition B3 – The site is predominantly covered with preloading material covered with geofabric which is free of weeds. The Auditors observed Lantana and possibly Castor Oil plant, both Class 4 noxious weeds, on site boundaries, particularly where these weeds are present on the adjoining sites. The presence of the weeds is not considered by the Auditors to represent a loss of amenity in the surrounding area nor an environmental hazard; however, there are opportunities to improve management of noxious weeds.

A red-bellied black snake (*Pseudechis porphyriacus*) was observed by the Auditors during the site visit at the edge of the embankment down to the mangroves, near the main stormwater outlet. This location is outside the site boundary. The red-bellied black snake is a native species and protected under the NSW *Biodiversity Conservation Act 2016*. Personnel at the site, particularly if they are working in the vicinity of waterways, drains and rocks where snakes may nest, should be advised of the risk presented by snakes and other potential biological hazards and the appropriate control measures to keep personnel and protected species safe. The CEMP does not cover protection of native fauna at the site or protection of people that may encounter it.

Although Veolia has advised the community of telephone numbers for the purpose of raising questions or concerns, there is no single complaints line telephone number for the development that is identified as the complaints line.

#### **4.15 Key Strengths**

The pre-loading material at the site was entirely covered in geofabric that appeared to be in good condition. A small number of sand bags were observed to have split; however, it is noted that Site Environmental Inspection Reports indicated that the condition of the sand bags was being monitored and action taken as required.

The foreshore along Parramatta River appeared to be free of litter and there was no visual evidence of impact on the river from the development.

## 5. RECOMMENDATIONS AND OPPORTUNITIES FOR IMPROVEMENT

### 5.1 Recommendations in Relation to Non-compliances

- a) SSD 4964 Condition B7 – Revision 2 of the WMP should be made publically available following approval by the DPE.
- b) EPL 4806 Condition O4.1 – Update PIRMM and/or CEMP to meet all PIRMP requirements under the legislation. Although there are currently no buildings at the site and site is unattended, it is recommended that a copy of the updated plans be kept at the site to satisfy the requirement of the legislation.
- c) EPL 4806 Condition G1.1 – Keep a copy of EPL 4806 at the site to satisfy the requirement of the licence.

### 5.2 Recommendations in Relation to Opportunities for Improvement

- a) Consider whether the environmental compliance program can be improved to better accommodate construction projects as well as operational facilities.
- b) Consider liaising with occupiers of the adjoining sites to improve the effectiveness of noxious weed management along site boundaries.
- c) Update the CEMP to cover management of protected fauna, including the regulatory requirements in relation to their protection and the control measures to prevent harm to protected snakes and the people that may come into close proximity with the snakes.
- d) Consider establishing a single complaints telephone line and reference it consistently in relevant documents, the Veolia website and public notifications. It could be site specific or a telephone line used for Veolia's NSW or National facilities.

## 6. CONCLUSIONS

The Auditors assessed the development to be generally compliant with the conditions of Development Consent SSD 4964 and EPL 4806. Four non-compliances were identified, which are considered to be of an administrative nature. Several opportunities for improvement were also identified. Management systems and environmental performance of the development are considered to be adequate for the stage of development.

## **APPENDIX A INDEPENDENT AUDIT TABLES**

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>	<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>	
<b>Part A – Administrative Conditions</b>			
A1	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the Development.	Compliant	
A2	The Applicant shall carry out the Development in accordance with the: a) EIS; b) RTS; c) Site layout plans and drawings (see Appendix A); and d) Management and Mitigation Measures (see Appendix B).	Compliant	
A3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Noted	
A4	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent; and b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	Noted	It is understood the DPE has not specified additional requirements.
A5	This consent lapses 5 years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under Section 95 of the Act.	Noted	
A6	The Applicant shall ensure that all licences, permits, and approvals/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals/consents.	Compliant	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
A7	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i> .	Not triggered	
A8	The Applicant shall not receive or process on the site more than 200,000 tonnes of waste per calendar year.	Not triggered	
A9	The Applicant shall not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, use, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	Compliant	
A10	The Applicant shall ensure that all plant and equipment used for the Development is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Compliant	No mobile plant was on-site during the Audit inspection and the only operational equipment was the stormwater sump pump. It is understood that the pump is inspected during a monthly site inspection and following rain events.
A11	The Applicant shall ensure that all demolition work is carried out in accordance with <i>Australian Standard AS 2601:2001: The Demolition of Structures</i> , or its latest version.	Not triggered	No demolition has been undertaken under this consent. Demolition of site infrastructure was carried out and completed subject to Parramatta City Council's DA Notice of Determination for the Demolition of Structures (DA/459/2015) dated 9/1/2016.
A12	With the approval of the Secretary, the Applicant may: a) submit any strategy, plan or program required by this consent on a progressive basis; and/or b) combine any strategy, plan or program required by this consent.	Compliant	In a letter dated 25 May 2017, the DPE accepted the staging of the construction works in two stages: <ul style="list-style-type: none"> <li>• Stage 1 - Pre-loading; and</li> <li>• Stage 2 - Construction of the MRF,</li> </ul> and the progressive submission of the management plans including the WMP, CEMP and FERMP. The Department noted that prior to commencement of construction of the MRF, Veolia is required to provide an updated WMP, CEMP and FERMP to the Department for approval.
A13	In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant shall and in the manner prescribed by clause 97 of the Regulation, surrender the development consents described in Table 1 prior to the issue of an Occupation Certificate for the Development.	Not triggered	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
A14	Within 14 days of the issue of a Construction Certificate for the Development, the Applicant shall ensure that there is a suitable meteorological station on the site that complies with the requirements in the latest version of the <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i> . The Applicant shall operate the meteorological station for the life of the Development.	Not triggered	
A15	The Applicant shall: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the Development; and b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the Development.	Not triggered	
A16	Prior to the issue of a Final Occupation Certificate for the Development, the Applicant shall obtain from a Site Auditor, a Site Audit Statement and a Site Audit Report which demonstrates that the site is suitable for its intended use(s).	Not triggered	
A17	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the Development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	Not triggered	
A18	Prior to the issue of a Construction Certificate for the development, unless otherwise agreed with Council, the Applicant shall pay development contributions to Parramatta Council calculated in accordance with <i>Section 94A Development Contributions Plan (Amendment No. 4) Parramatta City Council 20 May 2015</i> .	Not triggered	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
<b>Part B – Environmental Performance</b>			
B1	<p>From the commencement of operation, the Applicant shall implement a Waste Monitoring Program for the Development. The program must:</p> <p>a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;</p> <p>b) include suitable provision to monitor the:</p> <p>(i) quantity, type and source of waste received on site; and</p> <p>(ii) quantity, type and quality of the outputs produced on site.</p> <p>c) ensure that:</p> <p>(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and</p> <p>(ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.</p>	Not triggered	
B2	All processed and unprocessed waste must be stored within the building on the site.	Not triggered	
B3	<p>The Applicant shall:</p> <p>a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and</p> <p>b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in surrounding area.</p> <p><i>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</i></p>	Observation	The site is predominantly covered with preloading material covered with geofabric which is free of weeds. The Auditors observed Lantana and possibly Castor oil plant, both Class 4 noxious weeds, on the street frontage and along the western and eastern boundaries, particularly where these weeds are present on the adjoining sites. The presence of the weeds is not considered by the Auditors to represent a loss of amenity in the surrounding area nor an environmental hazard.
B4	A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water prior to the commencement of construction.	Not triggered	In a letter dated 25 May 2017, the Department advised that the Section 73 Compliance Certificate is to be obtained prior to commencement of Stage 2 construction works, being construction of the MRF.

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
B5	The Development shall comply with Section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	Compliant	
B6	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a Water Management Plan to the satisfaction of the Secretary. The plan must:</p> <p>a) be prepared by a suitably qualified and experienced person(s) in consultation with Council;</p> <p>b) include the details of:</p> <p>(i) the Water Management System (see Condition B8);</p> <p>(ii) erosion and sediment control measures (see Condition B9); and</p> <p>(iii) bunding (see Condition B11).</p>	Compliant	<p>A WMP outlining a Temporary Water Management System (WMS) for the pre-loading stage was prepared by Consult.in Pty Ltd and included in the CEMP (Appendix B) submitted to the DPE on 7 November 2016. Revision 1 of the WMP was provided to the DPE on 23 December 2016. A letter from DPE dated 23/5/2017 indicated that it was considered satisfactory. Veolia is required to provide an updated WMP prior to commencement of Stage 2 construction works, being construction of the MRF.</p> <p>Section 4 of the WMP addressed the consultation undertaken in the preparation of the WMP including with Parramatta City Council. This section was expanded in Revision 2 of the WMP issued on 7 May 2018. The Auditors consider the WMP to be adequate for this stage of development.</p>
B7	The Applicant shall carry out the Development in accordance with the Water Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Non-compliant	The Stage 1 WMP has been revised twice (December 2016 and May 2018). Revision 1 was submitted to the DPE in December 2016. Revision 2 (May 2018) was not submitted to the DPE. The Auditors note that this revision provided additional information and is generally consistent with the previous revision. Revision 2 has subsequently been submitted to the DPE (in December 2018).

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
B8	The Applicant shall operate a Water Management System for the site. The system must: a) be designed by a suitably qualified and experienced person(s) in consultation with Council; b) include: (i) a berm at the front of the site, which is designed to prevent catchment flows up to the 1 in 20 year Average Recurrence Interval event from entering the site; (ii) drainage for surface water toward the Parramatta River where possible; (iii) one way devices to prevent the ingress of river water to the water management system; and (iv) clean surface water diversion around operational areas of the site	Compliant	The WMS for Stage 1 Preloading was designed by Consult.in Pty Ltd as part of the WMP. At the time of the Audit, the pre-load material forms a berm at the front of the site and has a surveyed reduced level of 4.60 m AHD, which is higher than the 1 in 20 year ARI event peak fluvial flood level of 3.09 m AHD.
B9	The Applicant shall implement erosion and sediment control measures on-site in accordance with Managing Urban Stormwater: Soils and Construction Vol 1. (Landcom, 2004).	Compliant	
B10	The Applicant shall implement acid sulfate soils management measures in accordance with the guidance in the NSW Acid Sulfate Soil Management Advisory Committee's <i>Acid Sulfate Soil Manual</i> .	Not triggered	No excavation has been undertaken under this consent. The Auditors sighted an Acid Sulphate Soils Management Plan for stormwater works undertaken under an earlier Parramatta City Council approval (DA/54/2013).
B11	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007</i> .	Not triggered	No chemicals, fuels or oils were observed to be stored on the site.
B12	The Applicant shall ensure that: a) the finished floor level of any new building is a minimum of 0.5 metres above the 1 in 100 year Average Recurrence Interval flood level; and b) any part of a new structure is designed and constructed to be structurally sound during a flood event equivalent to the Probable Maximum Flood.	Not triggered	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
B13	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a flood emergency response plan to the satisfaction of the Secretary. The plan must:</p> <p>a) be prepared by a suitably qualified and experienced person(s) in consultation with Council;</p> <p>b) address the provisions of the <i>Floodplain Risk Management Guideline</i> (25 October 2007, Office of Environment and Heritage);</p> <p>c) include the details of the flood emergency responses for both construction and operation phases of the development;</p> <p>d) include details of:</p> <p>(i) site planning and design features;</p> <p>(ii) predicted flood levels;</p> <p>(iii) flood warning time and flood notification;</p> <p>(iv) evacuation and refuge protocols; and</p> <p>(v) awareness training for employees and contractors.</p>	Compliant	The Flood Emergency Response Management Plan (FERMP) for Stage 1 pre-loading was approved by the DPE in a letter dated 23/5/2017. Veolia is required to provide an updated FERMP prior to commencement of Stage 2 construction work.
B14	The Applicant shall carry out the Development in accordance with the flood emergency response plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Compliant	
B15	<p>The Applicant shall:</p> <p>a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site;</p> <p>b) keep accurate records of the volume and type of fill to be used; and</p> <p>c) make these records available to the Department upon request.</p>	Compliant	VENM was imported onto site to be used as pre-load material, the majority of which will remain onsite. It was sourced from a single site being the WestConnex construction site and comprised high grade rock and gravel material. The Auditors sighted the VENM Classification report for the material and records of truck movements.
B16	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Compliant	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
B17	The Applicant shall: a) carry out the Development so that air and odour emissions are minimised during all meteorological conditions; and b) implement best management practice, including all reasonable and feasible air and odour emission mitigation measures to minimise emissions from the Development.	Compliant	No odour was evident during the site walkover. The pre-load material is covered with geofabric to prevent erosion and dust emissions.
B18	During construction, the Applicant shall ensure that: a) all vehicles on site do not exceed a speed limit of 30 kilometres per hour; b) all loaded construction vehicles entering or leaving the site have their loads covered; and c) all loaded construction vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads.	Not verified	No construction activities were being undertaken at the time of the site visit. The Auditors cannot verify that delivery of pre-loading material complied with the condition; however, the Auditors have no reason to believe the condition has not been complied with.
B19	The Applicant shall carry out an Odour Audit of the Development no later than 6 months after operation of the Development. The audit must: a) be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Secretary; b) audit the Development in full operation; c) include a summary of odour complaints and any actions that were carried out to address the complaints; d) validate the Development against odour impact predictions in the EIS; e) review design and management practices in the Development against industry best practice for odour management; and f) include an action plan that identifies and prioritises any odour mitigation measures that may be necessary to reduce odour emissions.  <i>Note: The odour audit may be prepared so that it addresses the requirements of this consent and the EPL for the Development.</i>	Not triggered	

<b>Table A-1: Compliance with Development Consent SSD4964</b>																		
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>															
B20	Within six months of commissioning the Odour Audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with the Applicant's response to any recommendations contained in the audit report.	Not triggered																
B21	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of the Odour Audit report.	Not triggered																
B22	<p>The Applicant shall comply with the construction and operation hours in Table 2 unless otherwise specified in the EPL and agreed in writing by the Secretary.</p> <p><b>Table 2: Construction Hours</b></p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday - Friday</td> <td>7 am to 6 pm</td> </tr> <tr> <td>Saturday</td> <td>8 am to 1 pm</td> </tr> <tr> <td>Sunday &amp; Public Holidays</td> <td>Nil</td> </tr> <tr> <td rowspan="2">Operation</td> <td>Waste processing</td> <td>Any day 6 am to 10 pm</td> </tr> <tr> <td>Delivery and dispatch</td> <td>Any day Any time</td> </tr> </tbody> </table>	Activity	Day	Hours	Construction	Monday - Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Sunday & Public Holidays	Nil	Operation	Waste processing	Any day 6 am to 10 pm	Delivery and dispatch	Any day Any time	Not verified	No construction activities were being undertaken at the time of the site visit. The Auditors cannot verify that pre-loading works complied with the condition; however, the Auditors have no reason to believe the condition has not been complied with.
Activity	Day	Hours																
Construction	Monday - Friday	7 am to 6 pm																
	Saturday	8 am to 1 pm																
	Sunday & Public Holidays	Nil																
Operation	Waste processing	Any day 6 am to 10 pm																
	Delivery and dispatch	Any day Any time																
B23	Despite Condition B22, any activity may occur at any time if that activity is required to be performed by police or other authorities for safety reasons; and/or if there is an on-site emergency that poses an immediate danger to personnel or equipment; and/or the operation or personnel or equipment is endangered. In such circumstances, prior notification shall be provided to the EPA and any affected residents as soon as possible, or within a reasonable period in the case of emergency.	Not triggered																

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
B24	The Applicant shall: a) implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development; b) minimise the noise impacts of the Development during adverse meteorological conditions; c) install a steel fence on the northern and north-eastern side of the truck path; d) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and e) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.	Not triggered	
B25	The Applicant shall ensure that the operational noise generated from the Development does not exceed the criteria in Table 3.	Not triggered	
B26	The Applicant shall ensure that vibration resulting from the Development does not exceed the continuous or impulsive vibration criteria in EPA's <i>Assessing Vibration: A Technical Guideline</i> (February 2006) at residential receivers.	Not verified	No pre-loading or construction activities were being undertaken at the time of the site visit. Veolia advised that vibrating rollers were not used during pre-loading. The Auditors have no reason to believe the condition has not been complied with.

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
B27	<p>The Applicant shall ensure that:</p> <p>a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of Australian Standard AS 2890.1 and AS 2890.2;</p> <p>b) the swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTROADS Guide to Road Design;</p> <p>c) the Development does not result in any vehicles queuing on the public road network;</p> <p>d) all vehicles are wholly contained on site before being required to stop;</p> <p>e) all loading and unloading of materials is carried out on site;</p> <p>f) turning areas in the car park are kept clear of any obstacles, including parked cars, at all times;</p> <p>g) all trucks entering or leaving the site with loads have their loads covered;</p> <p>h) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads; and</p> <p>i) all vehicles enter and leave the site in a forward direction.</p>	Not triggered	
B28	<p>The Applicant shall:</p> <p>a) implement suitable measures to minimise the risk of fire on-site;</p> <p>b) extinguish any fires on-site promptly; and</p> <p>c) maintain adequate fire-fighting capacity on-site.</p>	Compliant	
B29	<p>All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with <i>Australian Standard AS 4282 1997</i>.</p>	Not triggered	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
B30	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a Landscape Management Plan to the satisfaction of the Secretary. The plan shall:</p> <p>a) detail the landscaping measures including vegetation that is to be planted to minimise the visual impact of the Development, particularly from adjoining premises and public vantage points; and</p> <p>b) include measures for monitoring and maintenance of revegetated areas.</p>	Not triggered	A Landscape Management Plan will be prepared as part of the detailed design for Stage 2 construction and will be submitted to the Secretary for approval.
B31	The Applicant shall carry out the Development in accordance with the Landscape Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Not triggered	
B32	The Applicant shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered. If human remains are uncovered, you must immediately stop work, not further disturb the remains and notify NSW Police. OEH and the Aboriginal community must be contacted if the remains are suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, you must immediately stop work, not further disturb the objects and notify OEH by calling Environment Line on 131 555. Works must not resume in the designated area until the relevant written consent is received from NSW Police and/or OEH. Any Aboriginal objects discovered must be registered on the Aboriginal Heritage Management Information System (AHIMS), in accordance with section 89A of the <i>National Parks and Wildlife Act 1974</i> .	Not triggered	The Stage 1 pre-loading activities have not involved excavation.
B33	<p>The Applicant shall:</p> <p>a) install and maintain a perimeter fence and security gates on the site; and</p> <p>b) ensure that the security gates on site are locked whenever the site is unattended.</p>	Compliant	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
<b>Part C – Environmental Management, Reporting and Auditing</b>			
C1	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s);</li> <li>b) describe all activities to be undertaken on the site during construction, including a clear indication of construction stages;</li> <li>c) identify the statutory approvals that apply to the Development;</li> <li>d) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment;</li> <li>e) detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts;</li> <li>f) describe of the roles and responsibilities for all relevant employees involved in construction;</li> <li>g) include arrangements for community consultation and complaints handling procedures during construction; and</li> <li>h) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent;</li> </ul>	Compliant	A CEMP for Stage 1 pre-loading was submitted to the DPE on 7 November 2016. A letter from DPE dated 23/5/2017 approved the CEMP. The Auditors consider the CEMP to be adequate for this stage of the development. Veolia is required to provide an updated CEMP prior to commencement of Stage 2 construction works, being construction of the MRF.
C2	The Applicant shall carry out the development in accordance with the Construction Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Compliant	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
C3	<p>Prior to the commencement of operation, the Applicant shall prepare an Operational Environmental Management Strategy to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s);</li> <li>b) provide a strategic framework for environmental management of the Development;</li> <li>c) identify the statutory approvals that apply to the Development;</li> <li>d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;</li> <li>e) describe in general how the environmental performance of the Development would be monitored and managed; and</li> <li>f) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development;</li> <li>(ii) receive, handle, respond to, and record complaints;</li> <li>(iii) resolve any disputes that may arise;</li> <li>(iv) respond to any non-compliance; and</li> <li>(v) respond to emergencies.</li> </ul> </li> </ul>	Not triggered	
C4	<p>The Applicant shall carry out the Development in accordance with the Operational Environmental Management Strategy approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	Not triggered	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
C5	<p>The Applicant shall ensure that the environmental management plans/strategies required under this consent are prepared in accordance with any relevant guidelines and include:</p> <p>a) detailed baseline data;</p> <p>b) a description of:</p> <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures/criteria;</li> <li>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures;</li> <li>(iv) the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</li> </ul> <p>c) a program to monitor and report on the:</p> <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the Development;</li> <li>(ii) effectiveness of any management measures;</li> <li>(iii) a contingency plan to manage any unpredicted impacts and their consequences;</li> <li>(iv) a program to investigate and implement ways to improve the environmental performance of the Development over time;</li> </ul> <p>d) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> <li>(i) incidents;</li> <li>(ii) complaints;</li> <li>(iii) non-compliances with statutory requirements; and</li> <li>(iv) exceedances of the impact assessment criteria and/or performance criteria; and</li> <li>(v) a protocol for periodic review of the plan.</li> </ul>	Compliant	Management plans are considered to address relevant requirements for this stage of development.
C6	The Secretary may waive some of the requirements in Condition C5 if they are unnecessary or unwarranted for particular management plans/strategies.	Noted	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
C7	The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the Development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	Not triggered	Veolia advised that no incidents have occurred that have had caused or threatened to cause material harm to the environment.
C8	The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Compliant	The CEMP, 2016 WMP (Revision 1) and AEMR are available on the Veolia website ( <a href="https://www.veolia.com/anz/our-services/services/municipal-residential/recovering-resources-waste/camellia-recycling-centre">https://www.veolia.com/anz/our-services/services/municipal-residential/recovering-resources-waste/camellia-recycling-centre</a> ).

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
C9	<p>Within 1 year of the date of this consent and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:</p> <p>a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary;</p> <p>c) include consultation with the relevant agencies;</p> <p>d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals);</p> <p>e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</p> <p>f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.</p>	Non-compliant	<p>The date of the consent was 6 July 2016. An Independent Environmental Audit was not commissioned within 1 year of this date; however, the Auditors sighted communication between Veolia and the DPE noting that no activities had been carried out under the consent in the first year (July 2016 to July 2017) and, therefore, the requirements of Conditions C9, C10 and C11 were not triggered. The commencement of works under this consent was commencement of preloading in July 2017. This IEA was commissioned in September 2018, which was not within 1 year of the commencement of Stage 1 preloading activities on 27 July 2017. While this is considered to be a non-compliance, the Auditors note that the non-compliance has been rectified by commissioning of this Audit and that the DPE has been kept informed of the timing. No further action is recommended. The DPE has subsequently issued a letter dated 17 December 2018 confirming that the first IEA was due to be commissioned by July 2018 and then future IEAs every three years thereafter.</p>
C10	<p>Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>	Not triggered	<p>It is anticipated that this Audit report will be submitted to the DPE within three months of commissioning.</p>

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
C11	<p>Within 1 year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development. This review must:</p> <p>a) describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;</p> <p>b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of the results against the:</p> <p>(i) the relevant statutory requirements, limits or performance measures/criteria;</p> <p>(ii) requirements of any plan or program required under this consent;</p> <p>(iii) the monitoring results of previous years; and</p> <p>(iv) the relevant predictions in the EIS;</p> <p>c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>d) identify any trends in the monitoring data over the life of the Development;</p> <p>e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</p> <p>f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.</p>	Compliant	<p>The date of the consent was 6 July 2016. An AEMR was not prepared for the period July 2016 to July 2017. The Auditors sighted communication between Veolia and the DPE noting that no activities had been carried out under the consent during that period and, therefore, the requirements of Conditions C9, C10 and C11 were not triggered.</p> <p>Veolia submitted the AEMR for the period July 2017 to July 2018 to the DPE on 6 September 2018 and the DPE confirmed that the AEMR was considered to generally satisfy the requirements of the condition.</p>

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
C12	<p>Within 3 months of the submission of an:</p> <p>a) annual review under Condition C11 above;</p> <p>b) incident report under Condition C7 above;</p> <p>c) audit under Condition C9 above; or</p> <p>d) any modification to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</i></p>	Compliant	The AEMR indicates that following the basin overflow in March 2018, the Site Inspection Checklist was revised to include a pump check.
C13	The Applicant shall ensure that the operation of the Development is undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary.	Not triggered	

<b>Table A-1: Compliance with Development Consent SSD4964</b>			
<b>CONDITION</b>		<b>COMPLIANCE STATUS</b>	<b>AUDIT COMMENTS</b>
C14	<p>The Applicant shall:</p> <ul style="list-style-type: none"> <li>a) ensure a 24 hour contact telephone number for the site is posted on the front fence of the site, and on its website;</li> <li>b) make copies of the following publicly available on its website:                             <ul style="list-style-type: none"> <li>(i) the documents referred to in Condition A2;</li> <li>(ii) all current statutory approvals for the Development;</li> <li>(iii) all approved strategies, plans and programs required under the conditions of this consent;</li> <li>(iv) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</li> <li>(v) a complaints register, updated on a monthly basis;</li> <li>(vi) the annual reviews of the Development;</li> <li>(vii) any independent environmental audit of the Development, and the Applicant's response to the recommendations in any audit; and</li> <li>(viii) any other matter required by the Secretary; and</li> </ul> </li> <li>c) keep this information up to date.</li> </ul>	Observation	<p>A contact telephone number is posted on the front fence. The Auditors note that the contact number goes to a recorded message service outside business hours.</p> <p>The EIS and RTS are not on the Veolia website; however, a link to these documents on the DPE Major Projects website is provided on the Veolia website.</p> <p>There have been no complaints and, therefore, a complaints register had not been created at the time of the Audit.</p> <p>The latest revision of the WMP (May 2018) is not available on the Veolia website.</p>

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
<b>1</b>	<b>Administrative Conditions</b>		
A1	<i>What the licence authorises and regulates</i>		
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <p><i>Refer to table in EPL</i></p>	Noted	
A1.2	<p>This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2.</p> <p>There are 3 stages to the scheduled development works of which the following stages are authorised by this licence:            Stage 1 - Preloading of Site and Stage 2 - Construction of Materials Recycling Facility. This licence does not permit Stage 3 - Operation of the Materials Recycling Facility. A licence variation will be required prior to the commencement of Stage 3.</p>	Noted	
A2	<i>Premises or plant to which this licence applies</i>		
A2.1	<p>The licence applies to the following premises:</p> <p>CAMELLIA RECYCLING CENTRE            37 GRAND AVE            CAMELLIA NSW 2142            LOT 1 DP 539890</p>	Noted	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>														
<b>Condition</b>	<b>Compliance Status</b>	<b>Audit Comments</b>												
<i>A3</i>	<i>Information supplied to the EPA</i>													
A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to:  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  b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	Noted												
<b>2</b>	<b>Discharges to Air and Water and Applications to Land</b>													
<i>P1</i>	<i>Location of monitoring/ discharge points and areas</i>													
P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.  <i>No areas identified in EPL</i>	Noted												
P1.2	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.  <i>Noise/Weather</i>	Noted												
<table border="1"> <thead> <tr> <th>EPA identification no.</th> <th>Type of monitoring point</th> <th>Location description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Meteorological Station</td> <td></td> </tr> <tr> <td>2</td> <td>Noise monitoring</td> <td>23 John Street Rydalmere</td> </tr> <tr> <td>3</td> <td>Noise monitoring</td> <td>18 Milton Street Rydalmere</td> </tr> </tbody> </table>			EPA identification no.	Type of monitoring point	Location description	1	Meteorological Station		2	Noise monitoring	23 John Street Rydalmere	3	Noise monitoring	18 Milton Street Rydalmere
EPA identification no.	Type of monitoring point	Location description												
1	Meteorological Station													
2	Noise monitoring	23 John Street Rydalmere												
3	Noise monitoring	18 Milton Street Rydalmere												

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>														
<b>Condition</b>			<b>Compliance Status</b>	<b>Audit Comments</b>										
<b>3</b>	<b>Limit Conditions</b>													
<i>L1</i>	<i>Pollution of waters</i>													
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.		Compliant											
<i>L2</i>	<i>Waste</i>													
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. 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" data-bbox="232 1034 999 1142"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>As defined in Schedule 1 of the POEO Act, as in force from time to time</td> <td>Resource recovery</td> <td></td> </tr> </tbody> </table>		Code	Waste	Description	Activity	Other Limits	NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Resource recovery		Not triggered	
Code	Waste	Description	Activity	Other Limits										
NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Resource recovery											
L2.2	No more than 200,000 tonnes of waste is to be received at the Premises per calendar year.		Not triggered											
L2.3	No more than 200,000 tonnes of waste is to be processed at the Premises per calendar year.		Not triggered											
L2.4	All processed and unprocessed waste must be stored wholly within the building at the Premises.		Not triggered											

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
L2.5	The authorised amount of waste permitted on the Premises must be applied to this Licence prior to the commencement of Stage 3 - 'Operation of the Materials Recycling Facility' of the development.	Not triggered	
L2.6	No waste is permitted to be received at the Premises for the purposes of resource recovery as outlined in Condition L2.1 until the Scheduled Development Works are complete and this Licence is varied to permit the operation of the Materials Recycling Facility.	Not triggered	
L2.7	No waste is permitted to be processed at the Premises for the purposes of resource recovery as outlined in Condition L2.1 until the Scheduled Development Works are complete and this Licence is varied to permit the operation of the Materials Recycling Facility.	Not triggered	
L3	<i>Noise Limits</i>		
L3.1	Noise emissions from the premises must be in compliance with the requirements of the EPA's NSW industrial noise policy.	Not triggered	
L3.2	Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2.	Not triggered	SLR Consulting Australia Pty Ltd (SLR) carried out an unattended ambient noise survey for the purpose of background noise monitoring between 18 and 26 July 2017, prior to commencement of Stage 1 pre-loading activities.

**Table A-2: Compliance with Environment Protection Licence 4806**

Condition		Compliance Status	Audit Comments																																								
<p>Point 2</p> <table border="1"> <thead> <tr> <th>Time period</th> <th>Measurement parameter</th> <th>Measurement frequency</th> <th>Noise level dB(A)</th> </tr> </thead> <tbody> <tr> <td>Day</td> <td>Day-LAeq(15 minute) (7am-6pm Mon.-Sat. &amp; 8am-6pm Sun &amp; Public Holidays)</td> <td>-</td> <td>40</td> </tr> <tr> <td>Evening</td> <td>Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)</td> <td>-</td> <td>40</td> </tr> <tr> <td>Night</td> <td>Night-LAeq(15 minute) (10pm-7am Mon.-Sat. &amp; 10pm-8am Sun.)</td> <td>-</td> <td>40</td> </tr> <tr> <td>Night</td> <td>Night-LA1 (1 minute)</td> <td>-</td> <td>56</td> </tr> </tbody> </table> <p>Point 3</p> <table border="1"> <thead> <tr> <th>Time period</th> <th>Measurement parameter</th> <th>Measurement frequency</th> <th>Noise level dB(A)</th> </tr> </thead> <tbody> <tr> <td>Night</td> <td>Night-LA1 (1 minute)</td> <td>-</td> <td>56</td> </tr> <tr> <td>Day</td> <td>Day-LAeq(15 minute) (7am-6pm Mon.-Sat. &amp; 8am-6pm Sun &amp; Public Holidays)</td> <td>-</td> <td>35</td> </tr> <tr> <td>Evening</td> <td>Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)</td> <td>-</td> <td>35</td> </tr> <tr> <td>Night</td> <td>Night-LAeq(15 minute) (10pm-7am Mon.-Sat. &amp; 10pm-8am Sun.)</td> <td>-</td> <td>35</td> </tr> </tbody> </table>		Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	40	Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	40	Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	40	Night	Night-LA1 (1 minute)	-	56	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Night	Night-LA1 (1 minute)	-	56	Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	35	Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	35	Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	35		
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																																								
Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	40																																								
Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	40																																								
Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	40																																								
Night	Night-LA1 (1 minute)	-	56																																								
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																																								
Night	Night-LA1 (1 minute)	-	56																																								
Day	Day-LAeq(15 minute) (7am-6pm Mon.-Sat. & 8am-6pm Sun & Public Holidays)	-	35																																								
Evening	Evening-LAeq(15 minute) (6pm-10pm Mon.-Sun.)	-	35																																								
Night	Night-LAeq(15 minute) (10pm-7am Mon.-Sat. & 10pm-8am Sun.)	-	35																																								
L3.3	<p>For the purpose of condition L3.2;</p> <ul style="list-style-type: none"> <li>• Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays.</li> <li>• Evening is defined as the period 6pm to 10pm.</li> <li>• Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sunday and Public Holidays.</li> </ul>	Noted																																									

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
L3.4	<p>The noise limits set out in condition L3.2 apply under all meteorological conditions except for the following:</p> <p>a) Wind speeds greater than 3 metres/second at 10 metres above ground level.</p> <p>b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or</p> <p>c) Stability category G temperature inversion conditions.</p>	Noted	
L3.5	<p>For the purposes of condition L3.4:</p> <p>a) Data recorded by a meteorological station installed on site must be used to determine meteorological conditions; and</p> <p>b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy.</p>	Noted	A meteorological station has not yet been installed on site.

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
L3.6	<p>To determine compliance:</p> <p>a) with the Leq(15 minute) noise limits in condition L3.2, the noise measurement equipment must be located:</p> <ul style="list-style-type: none"> <li>• approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or</li> <li>• within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises.</li> </ul> <p>b) with the LA1(1 minute) noise limits in condition L3.2, the noise measurement equipment must be located within 1 metre of a dwelling façade.</p> <p>c) with the noise limits in condition L3.2, the noise measurement equipment must be located:</p> <ul style="list-style-type: none"> <li>• at the most affected point at a location where there is no dwelling at the location; or</li> <li>• at the most affected point within an area at a location prescribed by conditions L3.6(a) or L3.6(b).</li> </ul>	Noted	
L3.7	<p>A non-compliance of condition L3.2 will still occur where noise generated from the premises in excess of the appropriate limit is measured:</p> <ul style="list-style-type: none"> <li>• at a location other than an area prescribed by conditions L3.6(a) and L3.6(b); and/or</li> <li>• at a point other than the most affected point at a location.</li> </ul>	Noted	
L3.8	<p>For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.</p>	Noted	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>															
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>												
<i>L4</i>	<i>Hours of operation</i>														
L4.1	<p>The hours of construction must be within the following hours:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td>Construction</td> <td>Monday - Friday</td> <td>7am to 6pm</td> </tr> <tr> <td></td> <td>Saturday</td> <td>8am to 1pm</td> </tr> <tr> <td></td> <td>Sunday</td> <td>Nil</td> </tr> </tbody> </table>	Activity	Day	Hours	Construction	Monday - Friday	7am to 6pm		Saturday	8am to 1pm		Sunday	Nil	Not verified	No construction activities were being undertaken at the time of the site visit. The Auditors cannot verify that pre-loading works complied with the condition; however, the Auditors have no reason to believe the condition has not been complied with.
Activity	Day	Hours													
Construction	Monday - Friday	7am to 6pm													
	Saturday	8am to 1pm													
	Sunday	Nil													
L4.2	<p>The hours of operation must be within the following hours:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td>Waste processing</td> <td>Any day</td> <td>6am to 10pm</td> </tr> <tr> <td>Delivery and dispatch</td> <td>Any day</td> <td>Any time</td> </tr> </tbody> </table> <p>Note: Condition L4.2 does not apply to the delivery of material outside the hours of operation permitted by condition L4.2, if that delivery is required by police or other authorities for safety reasons; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of emergency.</p>	Activity	Day	Hours	Waste processing	Any day	6am to 10pm	Delivery and dispatch	Any day	Any time	Not triggered				
Activity	Day	Hours													
Waste processing	Any day	6am to 10pm													
Delivery and dispatch	Any day	Any time													

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
L4.3	No waste is permitted to be received or processed at the Premises for the purposes of resource recovery as outlined in Condition L4.2 until the Scheduled Development Works are complete and this Licence is varied to permit the operation of the Materials Recycling Facility.	Not triggered	
L5	<i>Potentially offensive odour</i>		
L5.1	<p>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.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</p>	Noted	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
<b>4</b>	<b>Operating Conditions</b>		
<i>O1</i>	<i>Activities must be carried out in a competent manner</i>		
O1.1	Licensed activities must be carried out in a competent manner.  This includes:  a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and  b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Compliant	
<i>O2</i>	<i>Maintenance of plant and equipment</i>		
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity:  a) must be maintained in a proper and efficient condition; and  b) must be operated in a proper and efficient manner.	Compliant	No mobile plant was on-site during the Audit inspection and the only operational equipment was the storm water sump pump. It is understood that the pump is inspected during a monthly site inspection and following rain events.
<i>O3</i>	<i>Dust</i>		
O3.1	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind blown or traffic generated dust.	Compliant	
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	Not verified	No activities were being undertaken at the time of the site walkover. The Auditors have no reason to believe the condition has not been complied with.
O3.3	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Compliant	The pre-load material is covered with geofabric to prevent erosion and dust emissions.

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
O3.4	The licensee must ensure that no material, including sediment or oil, is tracked from the premises.	Compliant	
O4	<i>Emergency response</i>		
O4.1	<p>The licensee must prepare, maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises.</p> <p>Note: The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (the POEO Act) and the POEO Regulations.</p>	Non-compliant	<p>Veolia has a Pollution Incident Response Management Manual (PIRMM) that covers all NSW sites including the Camellia Recycling Facility and is available on their website (<a href="https://www.veolia.com/anz/about/about-veolia/industry-partnerships">https://www.veolia.com/anz/about/about-veolia/industry-partnerships</a>). The PIRMM notes that the requirements for preparing, and implementing a PIRMP for Veolia NSW facilities with EPLs are covered by site specific incident and emergency response documents. Section 5.2 of the CEMP comprises an incident response plan but it does not cross-reference the PIRMM and does not meet all of the requirements of Part 5.7A of the POEO Act and the POEO Regulations. The Auditors consider that the CEMP incident response plan is adequate for the current level of activity at the site; however, it does not technically comply with all legislative requirements. Furthermore, a copy of the PIRMP is required to be kept at the premises. Although the site is currently unattended, it is recommended that a copy of the PIRMP or equivalent document (e.g. PIRMM / CEMP) be kept at the site to satisfy the requirement of the legislation.</p>
O5	<i>Processes and management</i>		
O5.1	The licensee must ensure that any waste received and/or stored at the premises is assessed and classified in accordance with EPA Waste Classification Guidelines as in force from time to time.	Not triggered	
O5.2	Each type of waste stored on site for recovery/recycling must be stockpiled separately.	Not triggered	
O5.3	All above ground tanks containing material that is likely to cause environmental harm must be bunded or have an alternative spill containment system in place.	Not triggered	Three above ground tanks were retained when the site was demolished. These tanks are bunded; however, they are not in use and are empty.

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
O6	<i>Other operating conditions</i>		
O6.1	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007</i> .	Not triggered	No chemicals, fuels or oils were observed to be stored on the site.
O6.2	A Soil and Water Management Plan must be prepared for the Construction Phase of the development and implemented. The plan 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 should be prepared in accordance with the requirements for such plans outlined in <i>Managing Urban Stormwater: Soils and Construction (available from the Department of Housing)</i> .	Not triggered	Construction Phase (Stage 2) has not commenced.
O6.3	A Stormwater Management Scheme must be prepared for the Operational Phase of the development and must be implemented. Implementation of the Scheme must mitigate the impacts of stormwater run-off from and within the premises following the completion of construction activities. The Scheme should be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the Scheme should be consistent with the guidance contained in <i>Managing Urban Stormwater: Council Handbook (available from the EPA)</i> .	Not triggered	
<b>5</b>	<b>Monitoring and Recording Conditions</b>		
M1	<i>Monitoring records</i>		
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Noted	This licence does not require monitoring.

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
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.	Noted	
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.	Noted	
M2	<i>Recording of pollution complaints</i>		
M2.1	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.	Not triggered	No complaints have been received.

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
M2.2	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.	Noted	
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Noted	
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Noted	
<i>M3</i>	<i>Telephone complaints line</i>		
M3.1	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.	Compliant	The site is not currently operating. A telephone number is posted on the front fence of site that is answered during Veolia business hours and diverts to a messaging system after hours. Also, a community consultation line telephone number is provided in the CEMP which is available on the Veolia website. The community consultation line was called by the Auditors and was answered by a third party provider who would refer complaints to Veolia.

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
M3.2	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.	Compliant	Veolia sent a letter to neighbours prior to demolition and commencement of Stage 1 preloading that included the contact mobile telephone number for the preloading contractor's Project Engineer. As preloading activities are complete, this number is no longer current. The public has been informed of two avenues to for making a complaint, although they are not described as complaints lines. A contact telephone number is posted on the front fence of site that is answered during Veolia business hours and diverts to a messaging system after hours and a community consultation line telephone number is provided in the CEMP which is available on the Veolia website. The community consultation line is answered by a third party provider who would refer complaints to Veolia.
M3.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	Noted	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
<b>6</b>	<b>Reporting Conditions</b>		
<i>R1</i>	<i>Annual return documents</i>		
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ul style="list-style-type: none"> <li>1. a Statement of Compliance,</li> <li>2. a Monitoring and Complaints Summary,</li> <li>3. a Statement of Compliance - Licence Conditions,</li> <li>4. a Statement of Compliance - Load based Fee,</li> <li>5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,</li> <li>6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and</li> <li>7. a Statement of Compliance - Environmental Management Systems and Practices.</li> </ul> <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	Compliant	An Annual Return for the period 24/012017 to 23/01/2018 was received by the EPA on 22 March 2018.
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Noted	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <p>a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and</p> <p>b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</p>	Not triggered	
R1.4	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <p>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.</p>	Not triggered	
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').	Compliant	
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Compliant	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
R1.7	<p>Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <p>a) the licence holder; or</p> <p>b) by a person approved in writing by the EPA to sign on behalf of the licence holder.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p> <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	Compliant	The Annual Return was submitted electronically via eConnect EPA and has the digital signature of Veolia's Company Secretary
R2	<i>Notification of environmental harm</i>		
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Not triggered	No incidents have reportedly occurred.
R2.2	<p>The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>	Not triggered	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
<i>R3</i>	<i>Written report</i>		
R3.1	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <p>a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>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.</p>	Not triggered	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Not triggered	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
R3.3	<p>The request may require a report which includes any or all of the following information:</p> <p>a) the cause, time and duration of the event;</p> <p>b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>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;</p> <p>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;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</p> <p>g) any other relevant matters.</p>	Not triggered	
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Not triggered	
<b>7</b>	<b>General Conditions</b>		
<i>G1</i>	<i>Copy of licence kept at the premises or plant</i>		
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Non-compliant	A copy of the licence was not available at the premises. Although the site is currently unattended except for periodic inspections and monitoring, a copy of the EPL could be placed in the on-site storage container.
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Noted	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Noted	The site is currently unattended except for periodic inspections and monitoring.
<b>8</b>	<b>Special Conditions</b>		
<i>E1</i>	<i>Financial assurance</i>		
E1.1	A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking 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.	Not triggered	See condition E1.2.
E1.2	The financial assurance must be in favour of the Environment Protection Authority to an amount to be determined prior to the commencement of Stage 3 'Operation of Materials Recycling Facility' of the Scheduled Development Work. 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. 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 APRA.	Not triggered	
E1.3	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure.	Not triggered	
E1.4	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	Not triggered	
E1.5	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.	Not triggered	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
E1.6	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	Not triggered	
E2	<i>Environmental obligations of licensee</i>		
E2.1	<p>While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:</p> <p>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.</p> <p>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.</p> <p>c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.</p>	Compliant	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
E2.2	<p>In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee must:</p> <ul style="list-style-type: none"> <li>a) Make all efforts to contain all fire water on the premises;</li> <li>b) Make all efforts to control air pollution from the premises;</li> <li>c) Make all efforts to contain any discharge, spill or run-off from the premises;</li> <li>d) Make all efforts to prevent flood water entering the premises;</li> <li>e) Remediate and rehabilitate any exposed areas of soil and/or waste;</li> <li>f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of;</li> <li>g) At the request of the EPA, monitor groundwater beneath the premises and its potential to migrate from the premises;</li> <li>h) At the request of the EPA, monitor surface water leaving the premises; and</li> <li>i) Ensure the premises is secure.</li> </ul>	Not triggered	
E2.3	<p>After the licensee's premises cease to be used for the purposes to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:</p> <ul style="list-style-type: none"> <li>a) Remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and</li> <li>b) Rehabilitate the premises, including conducting an assessment of the site and if required remediation of any site contamination.</li> </ul>	Not triggered	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
<i>E3</i>	<i>Post Commissioning Noise Validation Report</i>		
E3.1	<p>After the Final Occupation Certificate is issued for the development approved by development consent No. SSD 4964, the licensee must engage a suitably qualified and experienced expert to prepare a post commissioning noise validation report in accordance with Condition L4.5. The report must include an attended noise monitoring assessment carried out for three consecutive operating days, at monitoring points 2 and 3 listed in Condition P1.2. The assessment must be carried out during each day, evening and night period as defined in Condition L3.3 for a minimum of:</p> <ul style="list-style-type: none"> <li>• 1.5 hours during the day;</li> <li>• 30 minutes during the evening; and</li> <li>• 1 hour during the night.</li> </ul>	Not triggered	
E3.2	<p>The post commissioning noise validation report must be prepared by a suitably qualified and experienced acoustical consultant and include:</p> <p>a) an assessment of compliance with noise limits presented in Condition L3.2 and</p> <p>b) an outline of any management actions taken within the monitoring period to address any exceedences of the limits contained in Condition L3.2.</p>	Not triggered	
E3.3	<p>The post commissioning noise validation report must be submitted to the EPA within 3 months of the Final Occupation Certificate being issued for the development approved by development consent No. SSD 4964.</p>	Not triggered	

<b>Table A-2: Compliance with Environment Protection Licence 4806</b>			
<b>Condition</b>		<b>Compliance Status</b>	<b>Audit Comments</b>
<i>E4</i>	<i>Post Commissioning Odour Audit</i>		
E4.1	<p>By 6 months from the commencement of operations the licensee must submit an odour audit report to the EPA's Director Waste Compliance. The odour audit report must address the following:</p> <p>a) A summary of any odour complaints received and actions taken to reduce odour emissions where complaints are verified;</p> <p>b) Benchmark the design and management practices at the Camellia Recycling Centre against industry best practice for minimising odour emissions. This should include, but not be limited to, fast close roller doors;</p> <p>c) Using the results of (a) and (b), if it is identified that the facility requires additional odour mitigation measures the report must include:</p> <ul style="list-style-type: none"> <li>• Proposed mitigation works and/or management practices to ensure that odour is minimised as far as is practicable; and</li> <li>• A timetable for the implementation of these works.</li> </ul>	Not triggered	

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



Contact: Alfarid Hussain  
Phone: (02) 9274 6456  
Email: [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

AMANDEEP BRAR  
VEOLIA AUSTRALIA GP PTY LTD  
LEVEL 4, 65 PIRRAMA RD  
PYRMONT NSW 2009

Dear Ms Brar

**Camellia Resource Recovery Facility (SSD 4964)- Endorsement of Independent Environmental Auditors**

I refer to your email dated of 2 August 2018 and 17 August 2018 requesting approval for Ms Victoria Sedwick, Mr David Ford, Ms Rosebud Yu and Ms Emily Rowe of Ramboll Environ Australia Ltd (ACN 095 437 442) to undertake the 2018 Independent Environmental Audit in accordance with Schedule 2, Part C, Condition C9, Schedule B of the approval SSD 6767 (**Approval**).

Approval is granted having considered the qualifications and experience of Ms Sedwick, Mr Ford, Ms Yu and Ms Rowe. This approval is conditional upon the auditors' independence from the project.

In preparing the IEA, you should ensure the audit:

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

Finally, the Department requests that you:

- review the IEA report to ensure it complies with the relevant conditions of consent, prior to submitting the report to the Secretary; and
- submit an action plan with the audit report(s) detailing your response to the auditor's recommendations and timeframes to implement any adopted recommendations.

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

Yours sincerely

Chris Mathieson  
Team Leader- Compliance  
As the Secretary's nominee

23/8/2018

## **APPENDIX C**

# **INDEPENDENT AUDIT DECLARATION FORM**

## INDEPENDENT AUDIT DECLARATION FORM

---

Project Name: Camellia Materials Recycling Facility  
Consent Number: SSD 4964  
Description of Project: Construction and operation of a materials recycling facility  
Project Address: 37 Grand Avenue, Camellia, New South Wales  
Proponent: Veolia Environmental Services (Australia) Pty Ltd  
Title of Audit: 2018 Independent Environmental Audit of Veolia Camellia Materials Recycling Facility  
Date: 20 December 2018

---

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

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

Notes :

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

Name of Lead Auditor: Victoria Sedwick  
Signature:   
Qualification: Exemplar Global Lead Auditor Accreditation No.13180  
Company: Ramboll Australia Pty Ltd  
Company Address: PO Box 560, North Sydney NSW 2060

## **APPENDIX D**

### **SITE INSPECTION PHOTOGRAPHS**



Photo 1: Geofabric over preloading material. Looking north towards Parramatta River from centre of site.



Photo 2: Looking south towards Grand Avenue from centre of site. Tanks remaining in south western corner to the right of the photo.

Title: Independent Environmental Audit	Approved:	Project-No.:	Date:
Site: Materials Recycling Facility, 37 Grand Avenue, Camellia	VS	318000580	Dec 2018
Client: Veolia Environmental Services (Australia) Pty Ltd			



Photo 3: Temporary stormwater sump at southern end of the site.



Photo 4: Temporary retention basin at northern end of the site.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318000580	Date: Dec 2018
Site: Materials Recycling Facility, 37 Grand Avenue, Camellia			
Client: Veolia Environmental Services (Australia) Pty Ltd			



Photo 5: Area outside northern site boundary showing barrier installed as part of remediation work under previous Council consent.



Photo 6: Western site boundary showing weeds encroaching from neighbouring site.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318000580	Date: Dec 2018
Site: Materials Recycling Facility, 37 Grand Avenue, Camellia			
Client: Veolia Environmental Services (Australia) Pty Ltd			



Photo 7: Eastern site boundary showing weeds encroaching from neighbouring site.



Photo 8: Signage at front of site.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318000580	Date: Dec 2018
Site: Materials Recycling Facility, 37 Grand Avenue, Camellia			
Client: Veolia Environmental Services (Australia) Pty Ltd			