

## Tarago Times March 2024 edition

I would like to thank the outgoing president of the Tarago Show Society, Wayne Baynham, for his hard work and dedication. I wish him all the best for the future. With the show just around the corner, I had the opportunity to meet Jenny Hajek, the newly appointed acting president of the show society. This was a great opportunity to visit the grounds and see the progress of various projects that have been supported by the Veolia Mulwaree Trust and explore ways in which the Woodlawn site could contribute to make this year's show another great success.

As we walked around the grounds, I couldn't help but reflect on the fact that it has been almost 20 years since Veolia arrived in Tarago when our initial act of goodwill was providing financial support to former mine workers who had lost their entitlements. Since then, we have continued to support Tarago and the surrounding areas through the Veolia Trust, as well as utilising the resources available at the Woodlawn site to assist wherever we can.

Even though the community has changed significantly since those early days, our commitment to being a part of this community remains unchanged, regardless of any challenges that may arise. I assured Jenny that our willingness to help the community and its various groups remains steadfast.

One of the remarkable aspects of small country towns is the presence of dedicated locals who volunteer their time to support events like the show and contribute to various community groups. I have had the privilege of working with many of these wonderful Tarago locals throughout the years, and I am excited to meet new volunteers in the future. Having grown up in a small country town myself, I truly believe that active involvement in such community initiatives is the best way to foster a strong and united community.

Following our meeting, we were pleased to offer our support by providing labour and a post hole digger to aid in the timely completion of the new horse yards. Additionally, we agreed to relocate the weather station to a more suitable location to avoid any inconvenience to parking arrangements. We have also made arrangements for a large skip bin to assist with the pre-show clean-up and will be providing additional bins for show day along with a bus service to ferry people from the Tarago village to the show.

### **Environmental Update**

Veolia has conducted an investigation into an alleged leaking container, which involved the following actions:

1. Temporary removal of container #765 from service on 24 January 2024;
2. Leak testing the container, on 25 January 2024, in accordance with the current container testing program;
3. Inspection of the container.

The leak test conducted on the container confirmed there were no leaks present. The investigation concluded that the observed 'leak' was actually water that had accumulated on the top of the container. This was supported by the location of the leak, as seen in the video footage. The waste was seen running down the side of the container, rather than coming out of the back door area of the container.

The video provided to Veolia shows water clearly running down the side of the container (water can be seen hitting the chain on the side of the door and running down to the bottom rear side of the container.. The door frame on the container encapsulates the back door so any liquid leaking from the door would run out the back of the container, not the side rear corner (see image below).



Rainwater can accumulate on the roof of the container and run down the sides during transit, especially when encountering hills or cornering. A review of historical rainfall data for both Sydney and Goulburn confirmed rainfall on 17 January 2024, and the preceding days, which coincides with the timeframe when the container was transported to Woodlawn.

When the container underwent inspection and testing as per the Bioreactor Maintenance Work Instruction, the following findings were made during the inspections and testing:

- The integrity inspection of the door did not identify any structural or sealing problems that could result in leaks.
- The leak testing (water test) conducted confirmed there were no leaks present.

### **Woodlawn ARC Response to Submissions Update**

Veolia submitted our interim response to submission report to the Department of Planning and EPA at the end of last year. The document is significant at over 350 pages and has multiple updated technical reports. We are awaiting a gap analysis outcome from the government departments to establish any missing information. This outcome is anticipated to arrive in March. We will then work with our consultants to address the gap analysis outcome and update modelling as necessary. This process is estimated to take approximately 6

months, however we will be able to provide a more accurate time estimate once we have the received gap analysis outcome.

Veolia is endeavouring to respond to the concerns of the community as transparently and completely as possible to enable everyone who is interested to have a good understanding of what we are proposing and how it will operate. In some instances the submissions required new information to be prepared as the particular question had never been anticipated. We also need to confirm with the Department that responses are relevant, specific and understandable in their view.

### Understanding what a non-compliance means

Every site regulated by the NSW EPA has an Environment Protection Licence that outlines precisely every activity on that site, how it is monitored and how it is reported.

A complex site like the Woodlawn Eco Precinct has hundreds of restrictions over more than 40 pages detailing every activity and how it should be carried out and reported. Any deviation from that licence, for whatever reason, is noted as a non-compliance by the NSW EPA and reported publicly on its website.

If you look at the [web page that details non-compliances<sup>1</sup>](#) with our licence for 2022 and 2023 you will see it even includes changes requested by the NSW EPA itself and in one case for reporting an incident by email instead of a phone call. In short, anything not included in the licence appears here, as it should.

Some non-compliances also refer to situations where Veolia had to take quick action beyond the licence conditions for the safety of the community and environment due to extreme weather impacts (see Table 1 below).

Another non-compliance instance includes not being able to provide samples from some boreholes because these access points were inaccessible or had no water present to sample due to weather and local environmental conditions. This was acknowledged and recorded by the NSW EPA, but no other action was taken. This is true of nearly every non-compliance noted on the NSW EPA web page.

Table 1

<u>Licence Condition number</u>	<u>Type of non-compliance</u>	<u>EPA actions</u>	<u>No. of times occurred</u>
M2.3	Sample frequencies were not achieved for some surface, groundwater, and standing water monitoring points due to being dry and/or inaccessible.	EPA action determined as part of scheduled inspection program	13

Source: NSW EPA<sup>2</sup>

<sup>1</sup>

<https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=11436&periodid=71971&searchrange=licence&option=noncompliance&range=POEO%20licence>

<sup>2</sup>

<https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?id=11436&periodid=71971&searchrange=licence&option=noncompliance&range=POEO%20licence>

As noted in the [NSW EPA's Regulatory Policy document](#)<sup>3</sup>, when a serious breach is suspected the NSW EPA will issue penalty notices, formal warnings, enforce stricter licence conditions, put out notices and directions, institute mandatory audits and legally binding pollution reduction programs, and enforceable undertakings. At the extreme end they may even prosecute a company.

Our focus continues to be to make our operations as safe for the community and environment as possible, and to comply with every aspect of our licence. With our Level-3 rating attracting the strongest scrutiny by the NSW EPA, and through our constant monitoring of the site and the actions we take, we continue to put the community first.

As always, we are available to respond to any questions about the Woodlawn ARC and Eco-Precinct.

## **UNDERSTANDING THE NSW EPA RATING SYSTEM AT WOODLAWN ECO-PRECINCT**

The main job of the NSW EPA is to 'work with the community, industry, businesses and other government agencies to protect and enhance NSW's environment'<sup>1</sup>. Essentially, their role is to make sure the environment is safe and healthy. EPA is the primary environmental regulator for New South Wales <sup>2</sup> and for Veolia this process involves EPA regulating our Environmental Protection Licence conditions.

We felt it would be useful to explain why the Woodlawn Eco-Precinct is rated by the EPA at Level 3 — High Risk<sup>3</sup>. Ratings (1-3) are a measure of risk, and are determined by a combination of regulatory priority and the environmental management category. Based on the complexity of the site, the nature of the operations being carried out, as well as the perceived risk the site attracts a high regulatory priority. The environmental management category is then determined by considering the following: Compliance and enforcement history, environmental risk mitigation measures, proactive environmental improvement projects, and attracts a rating from A to E. For a site that has high regulatory priority anything other than an environmental management category of A will result in a level 3 risk rating. You can find the risk matrix in the EPA's Guidance on using the risk assessment tool<sup>4</sup> (see Table 1).

Complex rehabilitation sites like the Woodlawn EcoPrecinct, which have multiple activities and are located on land contaminated by previous activities, are almost always rated as level 3. This is because they require a higher level of regulation across all activities and an extensive and detailed licence that addresses the management of each component. The Eco-Precinct licence includes a bioreactor landfill, bioenergy plant, and a mechanical and biological treatment plant. In addition, Woodlawn is a former abandoned lead mining site with significant contamination left over from that mining and processing period, which Veolia has been actively reducing and containing as part of our commitment to the site's

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<https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/about/21p3444-regulatory-policy.pdf>

rehabilitation. With all this activity, the previous contamination, and a lengthy, detailed licence that captures this, Woodlawn Eco-Precinct attracts a level 3 rating, meaning the site has the highest level of regulatory oversight.

<sup>1</sup> NSW Environmental Protection Authority (2024) What we do

<https://www.epa.nsw.gov.au/about-us/what-we-do> <sup>2</sup> NSW Environmental Protection Authority (2024)

Our organisation <https://www.epa.nsw.gov.au/about-us/ourorganisation> <sup>3</sup>NSW Environmental

Protection Authority (2024) POEO Licence Summary [https://app.epa.nsw.gov.au/prpoeoapp/Detail.](https://app.epa.nsw.gov.au/prpoeoapp/Detail.pdf?option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued)

[pdf?option=licence&searchrange=licence&range=POEO% 20licence&prp=no&status=Issued](https://app.epa.nsw.gov.au/prpoeoapp/Detail.pdf?option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued) <sup>4</sup> NSW

Environmental Protection Authority (2022) Riskbased licencing

[https://www.epa.nsw.gov.au/licensingand-regulation/licensing/environment-protection-licences/risk-bas](https://www.epa.nsw.gov.au/licensingand-regulation/licensing/environment-protection-licences/risk-based-licensing)

[ed-licensing](https://www.epa.nsw.gov.au/licensingand-regulation/licensing/environment-protection-licences/risk-based-licensing) <sup>5</sup> NSW Environmental Protection Authority (2022) EPA licensing guideline

[https://www.epa.nsw.gov.au/-/ media/epa/corporate-site/resources/licensing/22p3586-](https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/licensing/22p3586-epa-licensing-guideline-environmental-risk-levels)

[epa-licensing-guideline-environmental-risk-levels.](https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/licensing/22p3586-epa-licensing-guideline-environmental-risk-levels)

<sup>4</sup> Environment Protection Authority Guidance on using the risk assessment tool, Table 1 Risk matrix

<https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/licensing/22p3589-risk-assessment-to>

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