

Woodlawn MBT Independent Environmental Audit (IEA) 2022 Recommendation Responses

Table 1: Mandatory Recommendations

Condition	Observation	Recommendation	Action	Timeline
MP 06_0239				
Schedule 3, Condition 7	The 0.5 m freeboard was not maintained at all times during the Audit Period due to the notified exceedance on 10/12/21. The Auditors understand the exceedance is the subject of DPE and EPA investigation and Veolia are responding to their requests for further information, as well as improving controls to prevent a reoccurrence in the short term and longer term.	Relating to freeboard limit monitoring Veolia should: <ul style="list-style-type: none"> Specify the methodology and recording of freeboard limit monitoring in the SWLMP so that the method(s) of measurement (visual, instrumentation), the units, frequency, and any calculations are clearly provided; Ensure that the continuous level monitor is checked, serviced and maintained so that the data can be relied upon as a critical control for the Leachate monitoring system. As a critical control, the level monitor instrument should be in VAMS and maintained appropriately as a critical control. 	Veolia has already implemented improvements to measure leachate dam levels, including installation of level sensor and remote monitoring system using SCADA, and will continue to maintain this system using Veolia's Asset Management System (VAMS). This process will be updated in the Soil Water Leachate Management Plan (SWLMP).	Complete 1/10/2022
Schedule 3, Condition 16	Implementation of the SWLMP is considered non-compliant on the basis that: <ul style="list-style-type: none"> soil stabilisation and erosion controls have not been sufficiently effective to prevent TSS exceedances at EPA Point 8; and 	Review and revise Section 4.1 Soil Management comprising soil erosion and sediment controls in order to improve the effectiveness of the control measures to prevent TSS exceedances.	Veolia will review and revise Section 4.1 of the SWLMP, and incorporate an Erosion and Sediment Control Plan to address TSS management. Veolia has assessed the risks of implementing the contingency in the	1/10/2022 1/12/2022

	<ul style="list-style-type: none"> leachate was transferred to ED3S-S instead of the Reception Building pit in contravention of the approved SWLMP. 		SWLMP to pump liquid to the Reception Building pit at the time of the incident. It was determined, based on several factors, that this was not the action with the best environmental outcome. Consequently, the SWLMP is being reviewed and updated in light of learnings from the incident, and in consultation with relevant stakeholders. The updated SWLMP will be submitted to DPE for approval.	
Schedule 3, Condition 23	There were exceedances and therefore non-compliances, during the Audit Period at Point 4 (DG28, Pylara) and Point 6 (DG34, West Void) for stated reasons including drought, bushfires and dust storms.	Consider whether dust suppression controls at the MBT and across the Woodlawn Eco-Precinct require improvement, recognising that external circumstances such as seasonal bushfires and dust storms are not within Veolia's control.	<p>Veolia will develop a Trigger Action Response Plan to ensure appropriate dust suppression controls are implemented subject to operational activities and changing external circumstances and monitor effectiveness.</p> <p>Veolia will continue to implement existing dust suppression controls at the MBT and overall Eco-Precinct to ensure operational activities mitigated the emission of dust.</p>	1/10/2022
Schedule 4, Condition 4	In response to the freeboard limit exceedance of the leachate pond triggering immediate corrective actions on 10/12/21, Veolia issued an incident report to the EPA and the Department. The report was issued 33 days following the incident.	Investigate the reason(s) why the report was not issued within 6 days of notifying the Department. Implement a more robust process to ensure that the Department is notified in accordance with this condition in the event that another incident occurs.	<p>Veolia will investigate and review its processes and procedures with respect to incident reporting.</p> <p>Following this review, Veolia will make any updates identified as being required by the review, and provide refresher training to relevant Veolia staff.</p>	<p>1/10/2022</p> <p>1/12/2022</p>
EPL 20476				
Condition L2.4	Exceedances of the 100 percentile concentration limit for TSS, and possibly pH on at least one occasion were non-compliant.	Review the Point 8 monitoring results to confirm the number of TSS and possibly pH exceedances. Depending on the outcome of the review, notification of additional TSS and/or pH concentration	A review of Point 8 monitoring results and potential exceedances is being undertaken. Findings of the review will be reported in the annual environmental	1/10/2022

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		limit exceedances may be required relative to the exceedances reported in the 2021 Annual Return.	reports to DPE and the NSW Environment Protection Authority (EPA). Veolia will review and update sampling methodology, and incident notification requirements as per the corrective action in the previous non compliance. Veolia will review its erosion and sediment controls to further mitigate TSS exceedances, and update the Soil Water Leachate Management Plan (SWLMP).	
Conditions M2.1 & M2.2	Section C2 of the 2021 Annual Return indicated that Condition M2.1 was non-compliant because a dust gauge sample for Point 4 was broken in transit to the laboratory and therefore the sample frequency requirement under Condition M2.2 was not met.	The 2021 Annual Return indicated that the "laboratory has provided a safer means of transporting DDG's due to fragility of dust jars" therefore no further recommendation is made.	Use of an appropriate packing material supplied by the Laboratory is now being used to safely transport the dust jars. No further actions are required.	Complete
Conditions M1.1, M2.1 & M2.3	This is considered non-compliant because pH monitoring results were missing for Point 8. Conditions M2.1 and M2.3 are considered non-compliant because pH was not always monitored using the required sampling method and because pH and TSS were not monitored at the required frequency.	Ensure sample frequency requirements are met for Point 8. Review the field monitoring records and instrument calibration records to check that field monitoring procedures are being followed correctly, field pH measurements are documented, and field instruments are being maintained and calibrated with documented evidence of such, in accordance with manufacturers' recommendations and best management practice for water monitoring. Sample locations should also be clearly recorded to indicate if they are not recorded at EPA Point 8. If it is found that water monitoring procedures are not being followed,	Veolia will review that discharge sampling completed meets the monitoring methods and frequencies required under the EPL. Data validation improvements will be implemented to ensure accuracy of reporting. Further training will also be provided to relevant personnel to ensure the programme and procedures are followed.	1/10/2022

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		determine appropriate corrective actions to prevent a recurrence.		
Condition R1.7	The 2021 Annual Return did not appear to accurately reflect the Point 8 monitoring records. Not all of the monitoring data for Point 8 was reported in Sections B and Section C2, including two TSS exceedances on 10/12/21 and 13/12/21.	Review the 2021 Annual Return to confirm its accuracy. If it is found to contain inaccuracies, ensure that the Annual Return review and certification process is effective.	Veolia will review the monitoring records for Point 8, in light of the IEA findings to ensure accuracy of reporting in 2021 Annual Return. If any inaccuracies are found, Veolia will review its Annual Return review and certification process, and make any updates to its process identified by such review to improve its effectiveness.	1/12/2022

Table 2: Improvement Opportunities

Condition	Observation	Recommendation	Action	Timeline
MP 06_0239				
Schedule 2, Condition 9	It was observed during the site visit that a patch of soil was stained beneath the fuel tank of a Colombia Tipper indicating a possible leak.	Investigate the possible fuel leak of the Colombia Tipper including whether or not the leak should have been detected during the pre-start check. The Colombia Tipper should be repaired to prevent further leaks.	The identified leak was reported and repaired using Veolia's fault reporting process and SAP plant maintenance system. Veolia is completing a risk assessment on whether secondary containment of the fuel tank is necessary.	1/12/2022
Schedule 3, Condition 9	Relatively small fragments of weathered plastic litter was observed along the western embankment opposite and parallel to the post-fermented FOGO windrow located along the western edge of the Maturation Pad.	Investigate the nature and source of the plastic fragments, clean it up if practicable, and consider how to reduce the generation and spread of that material.	Veolia undertakes regular housekeeping activities including the removal of wind blown rubbish, and will make every attempt to prevent and reduce these types of materials where practicable.	Complete
Schedule 3, Condition 15	A 2500 L self-bunded diesel tank is located on the north-eastern corner of the concrete pad to the north of the fire pump building. A 1,000 L grey, portable tank was located next	Review the storage and handling of diesel in the portable diesel tank to ensure compliance with this condition. Consider how the requirement for bunding with 110% capacity may be met during both storage and during	A risk review of the storage and handling practices of the portable diesel tank was undertaken. Veolia will be sourcing a self bunded tank as a result of this review.	Complete 1/12/2022

	to it. It was not self-bunded and had no bunding or secondary containment.	filling activities.		
Schedule 3, Condition 16	Based on the site inspection, interviews, review of the Draft SWLMP (Rev 0.2, 02/02/22), review of surface water monitoring results and review of the S68/0177/1516 Approval, the Auditors made a number of observations in relation to the content of the SWLMP.	Review and revise the Draft SWLMP in light of the observations made in Table A-1, as follows: <ul style="list-style-type: none"> • Consider the hazard of erosion of the Leachate Storage System liner or Leachate Barrier System and the appropriate controls and measures for repairing damage to these systems; • Consider the hazard of treated sewage effluent contaminating a waterway / diversion drain and the appropriate controls, which should be consistent with GMC's S68/0177/1516 Approval requirements / specifications; • Consider whether the proposed increase in sewage requiring treatment requires seeking GMC approval through a modification to GMC's S68/0177/1516 Approval; • Correct minor errors and inconsistencies in Tables 5.1 and 6.1; and • Review and revise the Site Plan to accurately depict the Leachate Storage System and the On-Site Sewage Management Facility. 	The SWLMP will be reviewed and updated in accordance with the Auditors recommendations.	1/10/2022
Schedule 3, Condition 17	The site water balance will need to reflect the proposed increase in sewage requiring treatment. It is also unclear whether the mechanical evaporation in the Leachate Evaporation Dam is accounted for.	If it has not already been considered, the Auditors recommend that the site water balance account for the proposed increase in sewage requiring treatment and the mechanical evaporation in the Leachate Evaporation Dam.	A site water balance will be undertaken to consider any predicted increase in sewage treatment requirements if required. The site water balance will be updated to incorporate the Leachate Evaporation Dam.	1/09/2022

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Schedule 3, Condition 18	The description of the erosion and sediment controls contained in the SWLMP is limited and is not considered typical of an erosion and sediment control plan (ESCP). In particular, the ESCP does not describe individual erosion and sediment controls including their location, function and capacity but instead provides broad descriptions.	Review and revise the ESCP to provide more detail of the erosion and sediment control measures used including their location, function and capacity, as appropriate.	Veolia will review and revise Section 4.1 of the SWLMP, and incorporate an adequately detailed Erosion and Sediment Control Plan in consultation with the DPE.	1/10/2022
Schedule 3, Condition 19	The capacity of the rainwater tank reduced from 30 kL to 20 kL in the latest version of the SWLMP and site water balance.	Check the capacity of the rainwater tank and ensure that it is recorded accurately in the SWLMP and accounted for in the site water balance.	The capacity of the rainwater tank has been verified, and will be updated in the SWLMP and OEMP once the water balance has been finalised.	1/10/2022
Schedule 3, Condition 20	The Auditors reviewed Section 5 of the draft SWLMP comprising the surface water, groundwater, and leachate monitoring program. Whilst it has not changed significantly since the currently approved SWLMP, a number of observations were made in relation to inconsistencies with the requirements including EPL 20476, as well as the level of detail such as trigger levels and sampling methods not being detailed.	Review and revise the surface water, groundwater, and leachate monitoring program, based on the identified gaps/issues detailed in Table A-1 Findings for this Condition, in order to ensure it meets all of the requirements of Condition 20 and EPL 20476.	The SWLMP will be reviewed and revised to ensure that Veolia's surface, ground and leachate monitoring programme is consistent with the PA and EPL including trigger levels for action for various parameters, aspects and locations.	1/10/2022
Schedule 3, Condition 21	The Auditors reviewed Section 6 of the draft SWLMP comprising the surface water, groundwater and leachate response plan and found that performance measures / triggers for groundwater in EPA Point 11 were missing.	Include performance measures / triggers for groundwater in the surface water, groundwater and leachate response plan.	As above, the SWLMP will be reviewed and revised to ensure that Veolia's surface, ground and leachate monitoring programme is consistent with the PA and EPL including trigger levels for action for various parameters, aspects and locations.	1/10/2022
Schedule 3, Condition 24	The Draft OEMP (Rev 0.2, 02/02/22) refers to the Air Quality Monitoring Program in Section 3.5.3.5 Odour, which is not	Refer to the Air Quality Monitoring Program in the OEMP in a section related to deposited dust and refer to the Environment Monitoring Program (OEMP	Veolia will move the AQMP contained within the OEMP to the more appropriate section relating to deposited dust.	1/10/2022

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	considered entirely appropriate for Condition 24, which relates more to Condition 23, not Condition 22.	Appendix E) as containing the Air Quality Monitoring Program.		
Schedule 3, Condition 31	The car park is in the process of being extended and documentation is not yet available to show that it has been constructed in accordance with AS 2890. 1-2004.	Document that the car park extension anticipated to be completed by the end of May 2022 has been constructed in accordance with AS 2890. 1-2004.	The required documentation will be obtained.	01/09/2022
Schedule 4, Schedule 1	The Auditors reviewed the Draft OEMP (Rev 0.2, 02/02/22) and its sub-plans and made a number of findings and recommendations in relation to the content and implementation of the OEMP's sub-plans. A few gaps were also observed in roles and responsibilities, and authorities and accountabilities.	Review and revise the Draft OEMP to incorporate the findings of this Audit as they relate to the OEMP and associated Schedule 3 management plans and programs.	Veolia will review and ensure the OEMP and all sub-plans reflect all changes to describe the role and responsibility, authority and accountability of all the key personnel involved in the environmental management of the Facility.	1/10/2022
EPL 20476				
Condition P1.1	Point 4 is not indicated on the drawings attached to the Draft OEMP (Rev 0.2, 02/02/22) in Appendices D1.5 and D1.6. Labelling of EPA Points was inconsistent between the drawings.	Show Point 4 and the other EPA Points on a site plan, attached to the OEMP. It would also be helpful for the purpose of clarity if the site plan listed the EPA Points, similar to the table provided on the Woodlawn MBT drawing and included an additional column detailing the site label (e.g. DG28, DG33, DG34).	A site plan depicting all EPA monitoring points will be updated and appended to the OEMP accordingly.	1/10/2022
Condition P1.3	Points 3 and 10 were either not shown or labelled as an EPA Point on a site plan attached to the Draft OEMP.	Show Points 3 and 10 on a site plan attached to the OEMP. The plan(s) should indicate that they are EPA Points.	The abovementioned site plan will be amended accordingly to ensure Points 3 and 10 are clearly labelled and EPL monitoring points.	1/10/2022
Condition L3.2	The Auditors could not verify that the 30,000 tonnes mass limit had not been exceeded during the Audit Period based on the available information.	Review the incoming and outgoing waste masses to confirm the amount of waste at any one time on the site relative to the 30,000 tonnes mass limit.	Waste mass will be monitored and recorded weekly. These figures will be validated and confirmed by an independent consultant on a 6-monthly basis as part of the volumetric survey.	Complete

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Condition L3.2	The Draft OEMP (Rev 0.2, 02/02/22) refers to the Project Approval 06_0239 noise limit for operation (35 dB(A)) but not the L4.1 noise limit level (40 dB(A)).	Amend the Draft OEMP (Rev 0.2, 02/02/22) to include the Condition L4.1 noise limit for clarity.	The OEMP will be updated to include the EPL Condition L4.1 noise limit criteria of 40 dB(A).	1/10/2022
Condition L6.1	One of the doors to the Reception Building did not appear to fully close on departure of the trucks. Veolia have preventative maintenance systems in place for maintaining the Biofilters but weeds were observed growing on Biofilters 2 and 3.	Continued management of the biofilters should be undertaken in addition to a review of building enclosures onsite to ensure odours are effectively being managed.	The faulty reception building door was repaired prior to the finalisation of the Audit and biofilters will continue to be maintained in accordance with the O&M and operating parameters and recommendations of the Annual Independent Odour Audit.	Complete
Condition M3.2	A pH result may have been rounded down that could represent an exceedance of the 100 percentile concentration upper limit of 8.5. This depends on the methodology used to 'treat' and report sample results, which may depend on the accuracy of the measurement and the detail contained in EPA Approved Methods.	Review the EPA Approved Methods in relation to rounding of sample results for comparison with 100 percentile concentration limits and/or seek clarification and approval from the EPA on the method used.	Veolia has reviewed the approved methods for rounding sampling results, and will review its recording of water quality monitoring results ensuring that the applicable requirements are met.	Complete

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