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Veolia Environmental Services (Australia) Pty Ltd

Prepared by
Ramboll Australia Pty Ltd

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2022 INDEPENDENT ENVIRONMENTAL AUDIT VEOLIA WOODLAWN MBT FACILITY

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GLOSSARY

AEMR	Annual Environmental Management Report
CEMP	Construction Environmental Management Plan
DPE	NSW Department of Planning & Environment
E2W	earth2water Pty Ltd
EA	Environmental Assessment
ED1	Evaporation Dam 1
ED2	Evaporation Dam 2
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EMS	Environmental Management System
ENM	Excavated Natural Material
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
GMC	Goulburn Mulwaree Council
IBC	Intermediate Bulk Container
ICNG	Interim Construction Noise Guideline
IEA	Independent Environmental Audit
IMF	Intermodal Facility
ISO	International Organisation for Standardisation
JSEA	Job Safety and Environment Analysis
LAP	Leachate Aeration Pond
LEMP	Landfill Environmental Management Plan
LVMP	Landscape and Vegetation Monitoring Plan
MBT	Mechanical Biological Treatment
NC	Non-compliance
NSW	New South Wales
OEMP	Operational Environmental Management Plan
OFI	Opportunity for Improvement
OSSMF	On-Site Sewage Management Facility
PIRMM	Pollution Incident Response Management Manual
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations (Act)
PWMP	Pest and Weed Management Plan
PWS	Paperless Weighbridge System
RAP	Remedial Action Plan
RFI	Request for Information
RRE	Resource Recovery Exemption
RRO	Resource Recovery Order
RTS	Response to Submissions Report
STP	Sewage Treatment Plant
SWLMP	Soil, Water and Leachate Management Plan
TDS	Total Dissolved Solids
TSS	Total Suspended Solids
VAMS	Veolia Asset Management System
VENM	Virgin Excavated Natural Material
WMBT	Woodlawn MBT
WRVCP	Waste Receipt and Vehicle Control Plan

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 Woodlawn Mechanical Biological Treatment Facility, herein referred to as Woodlawn MBT. Woodlawn MBT is located at 619 Collector Road, Tarago, New South Wales (NSW). Woodlawn MBT is located within the larger Woodlawn Eco-Precinct that comprises the Woodlawn Bioreactor and Crisps Creek Intermodal Facility (IMF). The Project Approval, MP 06_0239, was granted on 6 November 2007. A Notice of Modification was issued on 17 June 2014 and a subsequent Notice of Modification was issued on 9 April 2019. Construction of the Woodlawn MBT commenced in October 2015 and was completed in March 2017. This was followed by a period of commissioning and the Woodlawn MBT was fully operational by July 2017.

Woodlawn MBT accepts municipal mixed solid, garden and food waste and subjects it to a combination of mechanical and biological treatments to separate out unusable material (e.g. glass and plastic) and recyclable metal and then treat the remaining mainly organic material to produce compost for reuse. Woodlawn MBT holds Environment Protection Licence (EPL) 20476 issued by the NSW Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act).

This is the second Independent Environmental Audit for this development. The Audit Period is from the date of the 2019 IEA site visit on 21 March 2019 to the date of this Audit site visit on 24 March 2022.

The Auditors assessed the development to be generally compliant with the conditions of Project Approval, MP 06_0239, and EPL 20476. Eight non-compliances were identified, seven of which have recommended actions. The eight non-compliances identified were as follows:

- NC1: 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. Given that a process is already underway for the appropriate improvement(s) to be determined to the satisfaction of DPE, EPA and WaterNSW, the Auditors make only two recommendations relating to freeboard limit monitoring as follows:
 - 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.
- NC2: MP 06_0239, Schedule 3, Condition 16 - Implementation of the SWLMP is considered non-compliant on the basis that:
 - soil stabilisation and erosion controls have not been sufficiently effective to prevent TSS exceedances at EPA Point 8; and
 - leachate was transferred to ED3S-S instead of the Reception Building pit in contravention of the approved SWLMP.

The Auditors recommend that Veolia 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. Improved controls may include significantly improving soil stabilisation. Implement the improved controls.

The Auditors understand that Veolia are seeking DPE approval to allow them to pump leachate to other leachate storage dams within the Woodlawn Eco Precinct in the event freeboard is <0.5 m. The Auditors make no recommendation on that matter.

- NC3: MP 06 0239, 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. The Auditors observe that the dust levels closest to the MBT, DG33, were well below the criterion. DG28 and DG34 are more influenced by the Woodlawn Bioreactor operations. The Auditors observe that the exceedances were not reported as exceedances or non-compliances in the 2019 and 2020 AEMRs. The Auditors recommend that Veolia 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.
- NC4: MP 06 0239, 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. The Auditors recommend that Veolia should 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.
- NC5: 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. The Auditors recommend in conjunction with Recommendations for Condition M2.3 and R1.7, that Veolia 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 limit exceedances may be required relative to the exceedances reported in the 2021 Annual Return.
- NC6: EPL 20476 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". The Auditors make no further recommendation.
- NC7: EPL 20476 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. The Auditors recommend that Veolia review the monitoring requirements for Point 8 and ensure that pH is measured in the field by Probe and results are recorded and used for reporting purposes. Veolia may confirm the sampling methodology with the EPA as considered appropriate. The Auditors also recommend that Veolia 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, determine appropriate corrective actions to prevent a reoccurrence.
- NC8: EPL 20476 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. Further to the Recommendations in relation to Conditions L2.4, M2.1 and M3.2, the Auditors recommend that Veolia 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.

Recommendations have been made in relation to eighteen opportunities for improvement as follows:

-
- MP 06 0239 Schedule 2, Condition 9 – 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. Contaminated soil should be cleaned up. Review a risk assessment for the Colombia Tipper to assess whether the fuel tank should be provided with secondary containment or other improved controls.
- MP 06 0239 Schedule 3, Condition 9 – 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.
- MP 06 0239 Schedule 3, Condition 15 – 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 filling activities.
- MP 06 0239 Schedule 3, Condition 16 – Review and revise the Draft SWLMP in light of the observations made in Table A-1, as follows:
 - 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.
- MP 06 0239 Schedule 3, Condition 17 – 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.
- MP 06 0239 Schedule 3, Condition 18 – 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.
- MP 06 0239 Schedule 3, Condition 19 – 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.
- MP 06 0239 Schedule 3, Condition 20 – 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.
- MP 06 0239 Schedule 3, Condition 21 – Include performance measures / triggers for groundwater in the surface water, groundwater and leachate response plan.
- MP 06 0239 Schedule 3, Condition 24 – 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 Appendix E) as containing the Air Quality Monitoring Program.

- MP 06 0239 Schedule 3, Condition 31 – 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.
- MP 06 0239 Schedule 4, Schedule 1 – 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.
- EPL 20476 Condition P1.1 – 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).
- EPL 20476 Condition P1.3 – Show Points 3 and 10 on a site plan attached to the OEMP. The plan(s) should indicate that they are EPA Points.
- EPL 20476 Condition L3.2 –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.
- EPL 20476 Condition L4.1 – Amend the Draft OEMP (Rev 0.2, 02/02/22) to include the Condition L4.1 noise limit for clarity.
- EPL 20476 Condition L6.1 –Continued management of the biofilters should be undertaken in addition to a review of building enclosures onsite to ensure odours are effectively being managed.
- EPL 20476 Condition M3.2 – 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.

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 Woodlawn Mechanical Biological Treatment Facility, herein referred to as Woodlawn MBT. Woodlawn MBT is located at 619 Collector Road, Tarago, New South Wales (NSW). Woodlawn MBT is located within the larger Woodlawn Eco-Precinct that comprises the Woodlawn Bioreactor and Crisps Creek Intermodal Facility (IMF). The Project Approval, MP 06_0239, was granted on 6 November 2007. A Notice of Modification was issued on 17 June 2014 and a subsequent Notice of Modification was issued on 9 April 2019. Construction of Woodlawn MBT commenced in October 2015 and was completed in March 2017. This was followed by a period of commissioning and Stage 1 Woodlawn MBT was fully operational by July 2017.

Woodlawn MBT accepts municipal mixed solid, food and garden waste and subjects it to a combination of mechanical and biological treatments to separate out unusable material (e.g. glass and plastic) and recyclable metal and then treat the remaining mainly organic material to produce compost for reuse. Woodlawn MBT holds Environment Protection Licence (EPL) 20476 issued by the NSW Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act).

This Independent Environmental Audit (IEA) is required under Condition 6, Schedule 4 of Project Approval MP 06_0239.

2.2 Audit Objectives

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

2.3 Audit Scope

The scope for the Audit is taken from Condition 6 (b) to (f) of Schedule 4 of Project Approval MP 06_0239, as modified in 2014 and 2019, as follows:

- 6 *Within 2 years of the commencement of operations, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:*
 - a) *be carried out by a suitably qualified, experienced and independent audit team containing a waste management specialist, whose appointment has been endorsed by the Secretary;*
 - b) *include consultation with EPA;*
 - c) *assess the environmental performance of the project, and its effects on the surrounding environment;*
 - d) *determine whether the project is complying with the relevant standards, performance measures and statutory requirements;*
 - e) *review the adequacy of the Environmental Management Plan for the project, compliance with the requirements of this approval, and any other licences and approvals; and, if necessary,*
 - f) *recommend measures or actions to improve the environmental performance of the project, and/or any plan/program required under this approval.*

As required under part b) of Condition 6, the Audit Team consulted with the EPA and under part d) of Condition 6, the Audit also assessed compliance against EPL 20476.

2.4 Exclusions

The MBT facility is located within the larger Woodlawn Eco-Precinct that comprises the Woodlawn Bioreactor and Crisps Creek Intermodal Facility (IMF). Project Approval 10_0012 and

Development Consent 31-02-99, as well as the two sites' EPLs, EPL 11436 and EPL 11455 for the Bioreactor and IMF were not reviewed as part of this Audit.

2.5 Audit Team

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

2.6 Audit Period

The Audit Period was from the date of the 2019 IEA site visit on 21 March 2019 to the date of the site visit on 24 March 2022.

3. AUDIT METHODOLOGY

3.1 Selection and Endorsement of Audit Team

All of the Ramboll Auditors referred to in Section 2.5 have training and extensive experience in conducting environmental compliance audits and are independent from Veolia. Emily Rowe is a certified Lead Auditor with Exemplar Global (Certificate No. 204997) and 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 24 February 2022 (**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 Project Approval MP 06_0239 and EPL 20476, which included all post approval documents prepared to satisfy the conditions relevant to the current stage of development. At the time of this Audit, it is understood that there have been two modifications of MP 06_0239 (17/06/14 and 09/04/19).

Condition 6 (b) to (f) of Schedule 4, MP 06_0239 requires that the IEA be conducted pursuant to *ISO 14010 – Guidelines and General Principles for Environmental Auditing*, *ISO 14011 – Procedures for Environmental Auditing* and any specifications of the Secretary. The former NSW Department of Planning, Infrastructure and Environment (DPIE, now DPE) issued the Independent Audit Post Approval Requirements (IAPAR) (DPIE, 2020). DPE also requested in consultation that the audit be conducted consistent with ISO 19011:2002 – Guidelines for Quality and/or Environmental Systems Auditing and consistent with IAPAR (DPIE, 2020). Hence, the IEA was conducted in accordance with IAPAR (Department, 2020), to the extent practicable, as well as ISO 14010, ISO 14011, ISO 19011 with particular regard to:

- Conduct and completion of the IEA in accordance with IAPAR requirements for an Independent Audit Methodology;
- Preparation of Independent Audit Reports in accordance with IAPAR requirements for an Independent Audit Report; and
- Allowing for pre-site audit documentation review, opening meeting, site audit, closing meeting and post-site audit documentation review and follow up.

3.3 Compliance Evaluation

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

- Site inspection of Woodlawn MBT, Tarago, on 24th March 2022, 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 photographs, 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 Feedback Line: 1800 241 750" number;
- Phone calls and email communications with the relevant authorities as detailed in Section 3.5; and
- Review of documents posted on the internet including Veolia, EPA and DPE websites.

3.4 Site Inspection and Interviews

Woodlawn MBT was inspected by the Auditors (Emily Rowe and Vanessa Perkins) on 24 March 2022. The following Veolia personnel were interviewed on the same day and/or in a subsequent video conference on 28 March 2022 and accompanied the Auditors during the site inspection:

- Ramona Bachu, National Environmental Compliance Manager

- Sureka Withanage, Facility Manager, Woodlawn MBT
- Nicole Boukarim, NSW and ACT Environmental Compliance Manager
- Reza Rafiee Process Engineer, Woodlawn MBT
- Marc Williams, Maintenance Supervisor
- Marea Rakete, Woodlawn Environmental Officer
- John Wray, SHEQ H&S Advisor

3.5 Consultation

Under the Conditions of Consent, formal consultation was not required. However, consultation was conducted in accordance with the IAPAR (DPIE, 2020) and the following authorities were consulted as shown in Table 1 -5.

Table 1 – Consultation with Authorities

Authority	Contact Details
DPE	Georgia Dragicevic, Senior Compliance Officer
EPA	Vanessa O'Keefe
WaterNSW	Dr Girja Sharma, Catchment Assessments Manager
Goulburn Mulwaree Council	Scott Martin

Table 2 – DPE Consultation

DPE Comment	Auditor Response
The Department requests that the auditor considers onsite water and leachate management, particularly, management of leachate in the western leachate dam, odour and waste management, including review of the current management and contingency measures, their suitability, monitoring of leachate and water onsite and any improvement opportunities. Please ensure other agencies such as Water NSW, Environment Protection Authority and Goulburn Mulwaree Council are also consulted.	The Auditors have considered and incorporated DPE's input during the assessment, as outlined in our Findings and Recommendations presented in Tables A-1 and A-2. The Auditors consulted the other agencies as discussed in Tables 3 to 5.

Table 3 – EPA Consultation

EPA Comment	Auditor Response
<p>EPA requests a review of the following items:</p> <ul style="list-style-type: none"> • Water and leachate management at the premises • Operations according to approved Environmental Management Plan • Confirmation that all processing areas are enclosed • Management of the biofilters is in accordance with management plans and manuals • Resource recovery order and exemption • Offensive odour 	<p>Implementation of the SWLMP and the OEMP were reviewed during the Audit, as outlined in our Findings and Recommendations presented in Tables A-1 and A-2.</p> <p>The majority of the buildings were observed to be enclosed during the site inspection with the following exceptions:</p> <ul style="list-style-type: none"> • One of the two roller doors at the Reception Building where trucks unload was observed to not be fully shutting following departure of trucks. The gap was approximately 1 m high. • The southern roller door of the Organic Buffer Storage building was open to allow loader entry. The

EPA Comment	Auditor Response
	<p>northern roller door was kept closed and only opened when food waste was unloaded into the building.</p> <ul style="list-style-type: none"> A couple of the doors in the Fermentation Building were open, one for maintenance purposes, and another during transfer of fermented food waste. <p>Management of the biofilters appeared to be undertaken in accordance with the management plans and manuals. It should be noted that weeds were observed on Biofilters 2 and 3.</p> <p>The Auditors assessed compliance with the EPA's Resource Recovery Order (RRO) and Resource Recovery Exemption (RRE) based on a limited review of available documentation provided by Veolia. The Auditors found that the Woodlawn Organic Outputs (WOO) were generally in accordance with the RRE and RRO with the following possible exceptions:</p> <ul style="list-style-type: none"> The RRO requires that <i>"the processor must ensure that Woodlawn organic outputs do not contain any asbestos"</i>. The Auditors understand that asbestos should not be present in the incoming waste streams received by the MBT. Whilst the RRO does not specify asbestos as a required analyte in Table 1, the 'MBT – WOO Sampling Procedure' (1 - MBT WOO Sampling Procedure.pdf) does not indicate how this is ensured or verified as compliant. Based on an Envirolab Certificate of Analysis for sample PS-20220114-1 collected 14/01/22, the sample was not tested for Lindane although a result was reported in a summary table of data (WOO Quality Monitoring - Results_Summary.pdf). The 'MBT – WOO Sampling Procedure' (1 - MBT WOO Sampling Procedure.pdf) requires that a composite sample be made up of <i>"a minimum of five discrete sub-samples of equal size"</i> whereas the RRO requires that a composite sample is made up of 5 sub-samples (i.e. not a minimum of 5 but exactly 5). <p>The Auditors assessed offensive odours at the site. The Auditors recommend continued management of the biofilters should be undertaken in addition to a review of building enclosures onsite to ensure odours are effectively being managed onsite.</p>

Table 4 – Water NSW Consultation

Water NSW Comment	Auditor Response
<p>WaterNSW requests to consider the following:</p> <ul style="list-style-type: none"> Whether the Soil Water & Leachate Management Plan including monitoring plans been updated and whether monitoring is being undertaken as per the updated plan 	<p>The SWLMP was in the process of being updated. The Auditors reviewed the Draft SWLMP, including aspects related to the Sewage Treatment Plant (STP).</p>

Water NSW Comment	Auditor Response
<ul style="list-style-type: none"> Whether and if the capacity of the STP been upgraded to cater for increased personnel 	<p>Implementation of the SWLMP was assessed during the Audit, as outlined in our Findings and Recommendations presented in Tables A-1 and A-2.</p> <p>Refer to Schedule 3, Conditions 7, 16 to 21, and Schedule 4, Condition 1.</p>

Table 5 – Goulburn Mulwaree Council Consultation

Goulburn Mulwaree Council Comment	Auditor Response
<p>GMC have no significant concerns regarding the MBT. Their concerns relate more to the Bioreactor operations.</p> <ul style="list-style-type: none"> Odour The haulage route and lack of a climbing lane at Crisps Creek IMF exit. Train stacking/waiting 	<p>The GMC's concerns were more related to the Bioreactor and not the MBT. The Auditor assessed MBT compliance with those conditions related to odour and transport.</p>

3.6 Compliance Status Descriptors

Although not specifically referenced in Project Approval, MP 06_0239 and Notice of Modification, this Audit Report has been prepared in accordance with the requirements for an Independent Audit Methodology and Independent Audit Report in DPIE's *Independent Audit Post Approval Requirements* (May 2020). 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.

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 or the EPA website were reviewed by the Auditors:

- AEMRs:
 - December 2019
 - December 2020
 - December 2021
- Annual Returns:
 - 22-12-2018 to 21-12-2019
 - 22-12-2019 to 21-12-2020
 - 22-12-2020 to 21-12-2021
- aPlus Plumbing Letter to Lipman Pty Ltd, Re: Veolia MBT Woodlawn Subcontract No: 1404-6300, Subcontract No: 1404-6300 Design and Construct Hydraulic Services, Verification of Compliance – Leachate Barrier System, 24/11/16
- Construction Environmental Management Plan – Woodlawn Mechanical Biological Treatment Facility, March 2016
- Copies of training certificates for 'operating a gantry or overhead crane'
- DPE letter to Veolia, Woodlawn Mechanical Biological Treatment Facility (MP 06_0239), Incident notification – western leachate pond 0.5 m freeboard limit exceedance and transfer of leachate, 10 December 2021, 18/03/22
- DPE email to Veolia, Woodlawn MBT Facility - Revised OEMP for Woodlawn MBT - More Information Required, 21/03/22
- earth2water Pty Ltd, Woodlawn MBT: Construction Quality Control Assurance for Leachate Evaporation Dam (MBT Pond East), 06/09/17
- E2W Letter to Veolia, Re: Fix of leachate pond spillway at the MBT Site, 07/02/22
- eConnect EPA: Annual Return Submitted, 30-01-2020, 09-02-2021 and 16-02-2022.
- EPA letter to Veolia, Woodlawn Landfill – EPL 20476 – Licence Variation Notice 1614231-DRAFT for comment, 14/12/21
- Eco-Precinct Complaints Register 2019 – 2022
- EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2022.
- EPL 20476
- EPA, Notice of Variation of Licence No. 20476, 20/12/21
- Employee Training Records
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- GMC, Veolia Host Fee Calculation / Invoice for the months of November 2019 to February 2022.
- Goulburn Mulwaree Council, Notice of Determination of an Application to Install an On-Site Sewage Management Facility, S68/0177/1516, 20/09/16
- Hydrometric Consulting Services, quarterly routine service and maintenance report
- Infinity Fire Protection, Routine Activity Test Results, Fire Detection Systems
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- LandTeam Australia Pty Ltd, Plan showing site layout and environmental Monitoring Points, Woodlawn MBT Facility, Collector Road, Tarago, Drawing No. 204543-30, Issue F, 20/02/17
- LandTeam, Woodlawn Environmental Protection Licence Site Monitoring Locations, , Drawing No.: 16800-225, B, 21/04/21
- Letter from DPE to Veolia dated 24/02/22, Woodlawn Mechanical Biological Treatment Facility (MP 06_0239) Independent Auditor 2022
- Letter from DPE, Woodlawn Mechanical Biological Treatment Facility (MP 06_0239) Incident notification – western leachate pond 0.5m freeboard limit exceedance and transfer of leachate, 10 December 2021 dated 18/03/22
- Letter from LandTeam to Veolia, Re: Volume Survey at Veolia MBT Facility, 19 July 2019; 19 December 2019; 03 July 2020; 17 December 2020; 21 January 2021; 30 June 2021; 14 October 2021
- Letter from NSW EPA to Ramboll dated 18/03/22, Woodlawn Landfill – IEA – Woodlawn MBT Facility (MP 06_0239) and EPL 20476)

- Letter from NSW EPA dated 13/05/20, Resource Recovery Order and Exemption for Woodlawn Organic Outputs
- Letter from Veolia, Western Leachate Pond Capacity – Woodlawn Mechanical Biological Treatment Facility – Environmental Protection Licence No.29476 dated 12/01/22
- Letter from LandTeam to Veolia, Re: Volume Survey at Veolia MBT Facility, 19 July 2019; 19 December 2019; 03 July 2020; 17 December 2020; 21 January 2021; 30 June 2021; 14 October 2021
- Letter from NSW EPA dated 13/05/20, Resource Recovery Order and Exemption for Woodlawn Organic Outputs
- Letter from Veolia, Re: Independent Environmental Audit (IEA) Report 2019 – Woodlawn Mechanical Biological Treatment (MBT) Facility – MP 06_0239
- MBT Surface Water - Site 140 (Point 8).xlsx
- MBT Waste Tracking Records 22/03/19 – 24/03/22
- Notice of Modification, 17 June 2014.
- Notice of Modification, 9 April 2019
- Notice of Variation of Licence No.20476 dated 20/12/21
- NSW Government Gazette No 114 of 2 November 2018
- NSW Woodlawn Eco Project Complaints Handling Procedure, PRO-13169-1, 20/04/2020
- NSW Woodlawn Eco-Precinct Complaint Form, TEM-5231-1
- NSW Woodlawn – Eco-Precinct Emergency Response Plan, part of the OEMP (draft dated 19/ 01/17)
- NSW Woodlawn ECO Project Odour Complaint Response, PRO-13168-1, 20/04/2020
- Pest and Weed Management Plan, part of the Woodlawn Bioreactor OEMP
- Poo Carters, AWTs Quarterly Service Report for Owner & Council, 07/03/22
- Project Approval, MP 06_0239, 6 November 2007.
- PWS Report full day (02-Mar-2022)
- Ramboll Australia Pty Ltd, Independent Environmental Audit, 17 May 2019
- Ramboll internal email, IEA of Woodlawn MBT - Consultation with GMC, 16/03/22
- Rapid Spray, Rapid Diesel, Active Diesel Tanks, Operator's Handbook
- Resource Recovery Exemption – The Woodlawn organic outputs acid mine tailings trail exemption 2020
- Resource Recovery Order– The Woodlawn organic outputs acid mine tailings trail order 2020
- Samples of completed pre-start checks for fixed and mobile plant and equipment
- Screenshot of the Veolia Asset Management System (VAMS) relating to the Woodlawn MBT.
- Signage at the entrance to the Woodlawn Eco-Precinct.
- Statement of Attainment, Operate a gantry or overhead crane, 05/08/20
- The Tarago Times (https://www.tarago.org.au/tarago_community_times.php)
- VAMS, Work Order, # Whole Fire System Service – Compliance – 1 Yearly, completed 23/11/21
- VAMS, Work Order, # Whole Fire System Service – 1 Monthly, completed 03/03/22
- VAMS, Work Order, # Yellow gear Fire suppression 6 monthly inspection, In progress, not dated
- Various Work Orders from the Veolia Asset Management System (VAMS) for Bio Filters 1 & 2; Annual Fire System Service; Monthly Fire System Service
- Veolia email to DPE, Request For Information (RFI-38091467) - Woodlawn Alternative Waste Technology Project (MP 06_0239), 11/03/22
- Veolia email to WaterNSW, Fwd: Woodlawn Alternative Waste Technology Project (MP 06_0239) Food and Garden Organics process improvement and revised Environmental Management Plan, 31/03/22
- Veolia, Emergency Response Plan Incorporating Pollution Incident Response Management Plan For Woodlawn Bioreactor, MBT & LTP, 619 Collector Road, Tarago NSW 2580, Crisps Creek Intermodal Facility, Bungendore Road, Tarago NSW 2580, Pylara Farm, 500 Collector Road, Tarago, NSW 2580, Document Reference: PRO-NSW-218-049-19, 1 August 2018.
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- Veolia, Environment Monitoring Program for Woodlawn Mechanical Biological Treatment Facility, 19/01/17
- Veolia, Fixed Plant Prestart.pdf
- Veolia letter to DPE, Woodlawn Alternative Waste Technology Project (MP 06_0239) Food and Garden Organics process improvement and revised Environmental Management Plan, 14/03/22
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- Veolia, MBT IEA RFI Documents - Appendix 11_04_2022.pdf
- Veolia, Mobile Plant Prestart.pdf

- Veolia, NSW Pollution Incident Response Management Manual, 1/1/2018 (downloaded from the Veolia website).
- Veolia, Operational Environmental Management Plan For Woodlawn Mechanical Biological Treatment Facility, Rev 1, 19/01/17
- Veolia, Operational Environmental Management Plan, Woodlawn Mechanical Biological Treatment Facility, Rev 0.2, Second draft, 02/02/22
- Veolia, Purchase Order 7100162330, Section 94 Road Contributions, 28/05/19
- Veolia, Purchase Order 7100168944, Tarago Road Funding Contribution, 02/07/19
- Veolia, Purchase Order 7100212901, Tarago Road Funding Contribution, 25/02/20
- Veolia, Purchase Order 7100235375, Tarago Road Funding Contribution, 26/06/20
- Veolia, Purchase Order 7100291754, Tarago Road Funding Contribution, 30/04/21
- Waste Receipt and Control Plan, Woodlawn Mechanical Biological Treatment Facility, Veolia, 02/02/22
- Veolia, SCADA Trends for ALT4301
- Veolia, Site Inspection Checklist for 31/12/21
- Veolia, Site Inspection Checklist, Fermentation / Matpad / Leachate pond / Stormwater dam
- Veolia Statement of Compliance – Reporting Period 16/11/21 – 13/01/22
- Veolia, Soil, Water & Leachate Management Plan For Woodlawn Mechanical Biological Treatment Facility, Rev 1, Final, 19/01/17
- Veolia, Soil, Water & Leachate Management Plan For Woodlawn Mechanical Biological Treatment Facility, Rev 0.2, Second draft, 02/02/22
- Veolia Solid Waste MBT -WOO Sampling Procedure PRO-15198-1 dated 01/02/21
- Veolia, Transport Code of Conduct – WL Bioreactor, 10/11/21
- Veolia, WL – MBT Weekly Process Checklist
- Veolia, Woodlawn Bioreactor Facility - Surface Water Quality Monitoring - Site 140 (MBT) , MBT Surface Water - Site 140 (Point 8).xlsx
- Veolia, Woodlawn Bioreactor - Groundwater Quality Monitoring, MBT Ground Water - WMBT11 (MB32) (Point 11).xlsx
- Veolia, Woodlawn Bioreactor - Leachate Compliance Monitoring – WMBT, MBT Leachate - Leachate Pond (Point 12).xlsx
- week52 02-01-2022-165840.pdf
- WL-MBT Operation in Reception & Pre-treatment Procedure, Veolia 14/05/19
- WOO Quality Monitoring – Results Summary
- Woodlawn Bioreactor - Depositional Dust Monitoring - West Void - DG24, MBT Master Record - Depositional Dust (Points 4, 6 & 7).xlsx
- Woodlawn Bioreactor Expansion Project IOA #7, #8 and #9, The Odour Unit Pty Ltd
- Woodlawn Eco-Precinct IOA 2021 Recommendation Responses
- Woodlawn_Hourly to 14_03_22.xlsx
- Woodlawn MBT Groundwater Sampling Data Sheet, 16 & 17/02/22
- Woodlawn MBT Leachate Sampling Data Sheet, 23/02/22
- Work Order Monthly Inspections – Bio Filters 1 & 2, Veolia, 20/03/22
- WORMALD, Record of Service, Pre-Engineered Systems, Foam

4.2 Compliance Performance

The Auditors assessed the development to be compliant with Project Approval, MP 06_0239 and EPL 20476 except for the following non-compliances shown in Table 6. Refer to the Independent Audit Tables (**Appendix A**) for full details of the identified non-compliances and compliance status of other conditions. Section 5.1 provides seven recommendations associated with the non-compliances.

Table 6: Summary of Non-compliances

NC#	Condition ID	Non-compliance
NC1	MP 06_0239, Schedule 3, Condition 7 EPL 20476, Condition O5.3	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.
NC2	MP 06_0239, 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 • leachate was transferred to ED3S-S instead of the Reception Building pit in contravention of the approved SWLMP.

NC#	Condition ID	Non-compliance
NC3	MP 06_0239, Schedule 3, Condition 23	<p>The Auditors recommend that Veolia 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. Improved controls may include significantly improving soil stabilisation. Implement the improved controls.</p> <p>The Auditors understand that Veolia are seeking DPE approval to allow them to pump leachate to other leachate storage dams within the Woodlawn Eco Precinct in the event freeboard is <0.5 m. The Auditors make no recommendation on that matter.</p> <p>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. The Auditors observe that the dust levels closest to the MBT, DG33, were well below the criterion. DG28 and DG34 are more influenced by the Woodlawn Bioreactor operations. The Auditors observe that the exceedances were not reported as exceedances or non-compliances in the 2019 and 2020 AEMRs.</p>
NC4	MP 06_0239, 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.
NC5	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.
NC6	EPL 20476 Condition 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 was not met.
NC7	EPL 20476 Condition M1.1, M2.1 & M2.3	Condition M1.1 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.
NC8	EPL 20476 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. Further to the Recommendations in relation to Condition L2.4, the Auditors recommend that Veolia 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.
Number of non-compliances identified:		8
Total number of compliance requirements:		173

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

An assessment of progress on the recommendations made in the 2019 IEA is presented in Table 7.

Table 7: Status of Previous Audit Recommendations

Approval ID	2019 IEA Recommendation	Action Status
Non-compliance recommendations		
EPL 20476 Condition L2.4	The limit for Total Suspended Solids (TSS) for Discharge Monitoring Point 8 exceeded the 100 percentile concentration limit of 50 mg/L on three consecutive monitoring events (February, June and November 2016). The exceedances were reportedly due to heavy rainfall events before or during monitoring. Veolia undertook corrective action. Given that the exceedances occurred in 2016 and corrective actions were undertaken, the Auditors do not recommend further action.	Exceedances of the 100 percentile concentration limit for TSS has continued to occur. The Auditors have made a recommendation to improve erosion and sediment controls to reduce turbidity and prevent TSS exceedances in Table A-1, Schedule 3, Condition 16.
EPL 20476 Condition M2.1/M2.2	Two consecutive monitoring rounds for Insoluble Solids were not collected at Monitoring Point 7 due to the late installation of a dust deposition gauge. The dust deposition gauge was subsequently installed and this Condition has been compliant since on the basis of available records. Therefore, on this basis, the Auditors do not recommend further action.	No issues have occurred since 2019 with the exception of a dust gauge sample for Point 4 that was broken in transit to the laboratory and therefore the sample frequency requirement was not met. The 2021 Annual Return indicates that the "laboratory has provided a safer means of transporting DDG's due to fragility of dust jars". The Auditors make no further recommendation.

Approval ID	2019 IEA Recommendation	Action Status
EPL 20476 Condition R3.5 (superseded)	Based on the EPA's POEO Public Register EPL 20476, there were four occurrences of a non-compliance with EPL 20476 Condition R3.5 "as monthly reports [were] not provided to the EPA from commencement of construction works on 4 occasions" and the "Licensee [had] rectified [the] matter". On the basis that this Condition was removed from EPL 20476 post-construction, the Auditors do not recommend further action.	This condition is now superseded. No action required.
Opportunity for Improvement Recommendations		
EPL 20476 Condition M5.2	EPL 20476 requires that a record must be kept of all complaints and Condition M5.2 requires that the record include a number of details. The Complaints Handling Procedure does not address all of the requirements of M5.2 and it focuses on odour complaints and not all potential types of complaints. An observation for improvement is provided that the procedure(s) and associated records be reviewed to ensure that the required information is fully captured and recorded.	A complaints handling as well as an odour complaints response procedure have been updated to address all the requirements of M5.2.
EPL 20476 Condition L6.1	The Auditors note that Mr Nick Feneley of the EPA, advised that he expected Woodlawn MBT to be assessed in the Woodlawn Bioreactor odour audits. An observation for improvement is for future odour audits to take the EPA feedback into account, if it has not already been addressed.	Woodlawn MBT has now been included in the Woodlawn Bioreactor odour audits since 2019.
MP 06_0239, Schedule 4, Condition 9	The Consent requires any plan or program required under this consent, or the completion of any independent audit or AEMR to be made publicly available on the Proponent's website. Previous AEMRs (March 2016 and December 2016) were not available via the Veolia website as the link had been broken. An observation for improvement is that records are to continually maintained on the website.	Information required to be made publicly available were observed on the Veolia website.

4.5 EMP, Sub-plans and Post Approval Documents

The Auditors consider the Construction Environmental Management Plan (CEMP); Operational Environment Management Plan (OEMP); Pest and Weed Management Plan; Soil, Water and Leachate Management Plan (SWLMP); Waste Receipt and Vehicle Control Plan (WRVCP); and Landscaping Management Plan for the Woodlawn MBT to be adequate. A number of opportunities for improvement are identified in Section 4.13.

4.6 EMS

Veolia has a Business Management System (BMS) that is third party accredited to ISO 14001 which has been implemented across the businesses including the Woodlawn Eco Precinct (as per an email from the Veolia National Governance Manager). There is no site-specific Environmental Management System (EMS). The Auditors consider management systems to be generally appropriate.

4.7 Environmental Performance

Veolia has completed the three AEMRs for Woodlawn MBT covering the period 9 September 2018 to 8 September 2021. The AEMRs provided background to Woodlawn MBT as well as a summary of performance for the reporting periods. 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.

4.8 Complaints

No complaints have reportedly been received in relation to Woodlawn MBT.

4.9 Incidents

One environmental incident reportedly occurred on 10/12/21 where the freeboard limit of the leachate pond was exceeded. The incident triggered immediate corrective action and was reported to the EPA and the Department. An incident report was issued to Veolia and the Department and corrective actions are currently being implemented by Veolia.

4.10 Actual Verses Predicted Environmental Impacts

As mentioned in Section 4.9, there has been one 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 24 March 2022 accompanied by the Veolia personnel referred to in Section 3.4. Photographs taken during the site visit and requested for inaccessible areas are provided in **Appendix D**.

4.12 Site interviews

A meeting was held at the Woodlawn Eco-Precinct Administration Building on the day of the site visit and a subsequent meeting held via video conference on 28 March 2022 that involved the Auditors and the Veolia personnel referred to in Section 3.4. Information regarding the history of the site and the Project was provided and documents and records were reviewed. Further information was also provided on request via email.

4.13 Improvement Opportunities

The following area has been identified as an opportunity for improvement. Refer to Section 5.2 for recommended actions. Refer to the Independent Audit Table (**Appendix A**) for full details.

Table 8: Opportunities for Improvement

Condition	Opportunity for Improvement
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. It had been recently acquired from the Woodlawn Bioreactor site and a pre-start record dated 24/03/22 (or possibly 24/02/22) indicated that there were no fuel or oil leaks.
MP 06_0239 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. It was observed that the FOGO windrow contained more visible quantities of plastic rubbish.
MP 06_0239 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 to it. It was not self-bunded and had no bunding or secondary containment, which appeared non-compliant. However, Veolia advised that the tank is only used for temporary storage for the purpose of transporting fuel to mobile plant and that <i>"Once filling has been completed, the tanker is emptied and replaced once not in use. ... The Tank is always kept empty except for when in use"</i> . The Auditors did not verify whether the tank was empty during the site visit but accept that it was most likely empty. The concrete beneath the hose appeared stained from possible drips / small leaks.
MP 06_0239 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. Please refer to Table A-1 for these observations.
MP 06_0239 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.
MP 06_0239 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. Erosion of the leachate barrier system and leachate dam liner should also be considered, as discussed in the Findings and Recommendations for Condition 16.
MP 06_0239 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.
MP 06_0239 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.
MP 06_0239 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.
MP 06_0239 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 considered entirely appropriate for Condition 24, which relates more to Condition 23, not Condition 22.

Condition	Opportunity for Improvement
MP 06_0239 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.
MP 06_0239 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.
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. The Woodlawn drawing does not show any of the MBT locations except Point 1 / 115 and Point 6 / DG34, although the latter Point looks to be located incorrectly.
EPL 20476 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.
EPL 20476 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.
EPL 20476 Condition L4.1	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)).
EPL 20476 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.
EPL 20476 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.

4.14 Key Strengths

Woodlawn MBT appeared to be in good condition, well maintained and operated by knowledgeable personnel.

5. RECOMMENDATIONS AND OPPORTUNITIES FOR IMPROVEMENT

5.1 Non-compliance Recommendations

- NC1: MP 06 0239, Schedule 3, Condition 7 & EPL 20476, Condition 05.3 - Given that a process is already underway for the appropriate improvement(s) to be determined to the satisfaction of DPE, EPA and WaterNSW, the Auditors make only two recommendations relating to freeboard limit monitoring as follows:
 - 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.
- NC2: MP 06 0239, Schedule 3, Condition 16 - The Auditors recommend that Veolia 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. Improved controls may include significantly improving soil stabilisation. Implement the improved controls.

The Auditors understand that Veolia are seeking DPE approval to allow them to pump leachate to other leachate storage dams within the Woodlawn Eco Precinct in the event freeboard is <0.5 m. The Auditors make no recommendation on that matter.
- NC3: MP 06 0239, Schedule 3, Condition 23 - The Auditors recommend that Veolia 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.
- NC4: MP 06 0239, Schedule 4, Condition 4 - The Auditors recommend that Veolia should 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.
- NC5: EPL 20476 Condition L2.4 - The Auditors recommend in conjunction with Recommendations for Conditions M2.3 and R1.7, that Veolia review the Point 8 monitoring results to confirm the number of TSS and possible pH exceedances. Depending on the outcome of the review, notification of additional TSS and/or pH concentration limit exceedances may be required relative to the exceedances reported in the 2021 Annual Return.
- NC6: EPL 20476 Conditions M2.1 & M2.2 - The 2021 Annual Return indicated that the "laboratory has provided a safer means of transporting DDG's due to fragility of dust jars". The Auditors make no further recommendation.
- NC7: EPL 20476 Conditions M1.1, M2.1 & M2.3 - The Auditors recommend that Veolia review the monitoring requirements for Point 8 and ensure that pH is measured in the field by Probe and results are recorded and used for reporting purposes. Veolia may confirm the sampling methodology with the EPA as considered appropriate. The Auditors also recommend that Veolia 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, determine appropriate corrective actions to prevent a reoccurrence.
- NC8: EPL 20476 Condition R1.7 - Further to the Recommendations in relation to Conditions L2.4, M2.1 and M2.3, the Auditors recommend that Veolia 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.

5.2 Opportunity for Improvement Recommendations

- MP 06 0239 Schedule 2, Condition 9 – 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. Contaminated soil should be cleaned up. Review a risk assessment for the Colombia Tipper to assess whether the fuel tank should be provided with secondary containment or other improved controls.
- MP 06 0239 Schedule 3, Condition 9 – 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.
- MP 06 0239 Schedule 3, Condition 15 – 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 filling activities.
- MP 06 0239 Schedule 3, Condition 16 – Review and revise the Draft SWLMP in light of the observations made in Table A-1, as follows:
 - 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.
- MP 06 0239 Schedule 3, Condition 17 – 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.
- MP 06 0239 Schedule 3, Condition 18 – 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.
- MP 06 0239 Schedule 3, Condition 19 – 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.
- MP 06 0239 Schedule 3, Condition 20 – 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.
- MP 06 0239 Schedule 3, Condition 21 – Include performance measures / triggers for groundwater in the surface water, groundwater and leachate response plan.
- MP 06 0239 Schedule 3, Condition 24 – 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 Appendix E) as containing the Air Quality Monitoring Program.

- MP 06 0239 Schedule 3, Condition 31 – 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.
- MP 06 0239 Schedule 4, Schedule 1 – 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.
- EPL 20476 Condition P1.1 – 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).
- EPL 20476 Condition P1.3 – Show Points 3 and 10 on a site plan attached to the OEMP. The plan(s) should indicate that they are EPA Points.
- EPL 20476 Condition L3.2 – 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.
- EPL 20476 Condition L4.1 – Amend the Draft OEMP (Rev 0.2, 02/02/22) to include the Condition L4.1 noise limit for clarity.
- EPL 20476 Condition L6.1 – Continued management of the biofilters should be undertaken in addition to a review of building enclosures onsite to ensure odours are effectively being managed.
- EPL 20476 Condition M3.2 – 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.

6. CONCLUSIONS

The Auditors assessed the development to be generally compliant with the conditions of Project Approval, MP 06_0239, and EPL 20476. Eight non-compliances were identified. Eighteen opportunities for improvement were also identified. Management systems and current environmental performance of Woodlawn MBT are considered adequate.

APPENDIX A

INDEPENDENT AUDIT TABLES

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
Schedule 2 – General Administrative Conditions					
1	The Proponent shall implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, and/or rehabilitation of the project.	<ul style="list-style-type: none"> • Veolia, Operational Environmental Management Plan For Woodlawn Mechanical Biological Treatment Facility, Rev 1, 19/01/17 (2017 OEMP) • Veolia, Operational Environmental Management Plan, Woodlawn Mechanical Biological Treatment Facility, Rev 0.2, Second draft, 02/02/22 (Draft OEMP (Rev 0.2, 02/02/22)) • Site visit on 24/03/22 • Interviews with facility personnel on 24/03/22 and 28/03/22 	<p>Measures to prevent and/or minimise harm to the environment are outlined in the Operational Environmental Management Plan (OEMP). Specific requirements of the OEMP were audited under the relevant conditions of Project Approval 06_0239 below.</p> <p>The review of site documentation; observations and interviews with site representatives demonstrated that the existing environmental management system is considered generally adequate in addressing the development's Project Approval 06_0239 requirements.</p> <p>An incident occurred on 10/12/21 that was reported under Schedule 4, Condition 3. The incident related to an exceedance of the freeboard limit. Veolia responded to the incident by seeking to minimise harm to the environment by lowering the level in the Western Leachate Pond by pumping leachate to ED3S- and thus preventing the pond from overflowing and entering a waterway.</p>	Compliant	
2 (as modified)	The Proponent shall carry out the project in accordance with the: (a) Statement of Commitments; (b) all written directions of the Planning Secretary; (c) MOD 1; (d) MOD 2; (e) the Development Layout in Appendices 1, 4 and 5; and (c) conditions of this approval.	<ul style="list-style-type: none"> • Evidence provided for other Conditions 	The Auditors' review of documentation, audit observations and interviews with site representatives demonstrated the operation of the site has been conducted generally in accordance with the identified documents and conditions of this consent during the Audit Period. Compliance with requirements were audited under specific conditions of Project Approval 06_0239.	Compliant	
3	If there is any inconsistency between the above, then the conditions of this consent	<ul style="list-style-type: none"> • Interviews with facility personnel on 24/03/22 and 28/03/22 	Facility personnel were not aware of any inconsistencies.	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	shall prevail to the extent of the inconsistency.				
4	<p>The Proponent shall comply with any reasonable requirement/s of the Planning Secretary arising from the Department's assessment of:</p> <p>(a) any reports, plans, programs or correspondence that are submitted in accordance with this approval; and</p> <p>(b) the implementation of any actions or measures contained in these reports, plans, programs or correspondence.</p>	<ul style="list-style-type: none"> • Veolia email to DPE, Request For Information (RFI-38091467) - Woodlawn Alternative Waste Technology Project (MP 06_0239), 11/03/22 • DPE letter to Veolia, Woodlawn Mechanical Biological Treatment Facility (MP 06_0239), Incident notification – western leachate pond 0.5 m freeboard limit exceedance and transfer of leachate, 10 December 2021, 18/03/22 • DPE email to Veolia, Woodlawn MBT Facility - Revised OEMP for Woodlawn MBT - More Information Required, 21/03/22 • Interviews with facility personnel on 24/03/22 and 28/03/22 	<p>Facility personnel advised that the DPE had not made any requirements during the Audit Period.</p> <p>However, the Auditors observe that:</p> <ul style="list-style-type: none"> • DPE issued a Request for Information (RFI) on 03/03/22 (not provided to the Auditors) in relation to the freeboard limit exceedance, which Veolia responded to on 11/03/22. • DPE advised Veolia on 18/03/22 to contact DPE's "assessments unit in relation to the appropriate approval pathway to enable transfer of treated leachate from the western leachate pond to a location other than the Reception Building pit to avoid future non-compliance with Schedule 3, Condition 16 of the approval". Given the timing, Veolia were yet to respond to this advice within the Audit Period. • DPE requested Veolia on 21/03/22 to provide additional information on the Revised OEMP before DPE would accept the document. Given the timing, Veolia were yet to respond to this request within the Audit Period. 	Compliant	
5	<p>Waste operations may only take place for 25 years from the commencement of operations on site.</p> <p><i>Note: Under this approval the Proponent is required to decommission the project upon</i></p>	<ul style="list-style-type: none"> • Ramboll Australia Pty Ltd (Ramboll), 2019 Independent Environmental Audit, Veolia Woodlawn MBT 	The Woodlawn MBT was commissioned between March and June 2017 and operational in July 2017. Therefore, waste operations may continue until July 2042 under the current Project Approval 06_0239	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<i>the completion of waste operations and rehabilitate the site to the satisfaction of the Planning Secretary. Consequently, this approval will continue to apply in all other respects other than the right to conduct waste operations on site until the site has been rehabilitated to a satisfactory standard.</i>	Facility, 17/05/19 (2019 IEA)			
6	With the approval of the Planning Secretary, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis.	<ul style="list-style-type: none"> Interviews with facility personnel on 24/03/22 and 28/03/22 		Not triggered	
7	<p>The Proponent shall ensure that any new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <i>Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for any building works.</i> <i>Part 8 of the EP&A Regulation sets out the detailed requirements for the certification of project.</i> 	<ul style="list-style-type: none"> Interviews with facility personnel on 24/03/22 and 28/03/22 	No new buildings or structures or alterations to existing buildings or structures were reportedly constructed during the Audit Period.	Not triggered	
8	The Proponent shall ensure that all demolition work is carried out in accordance with AS 2601-2001: <i>The Demolition of Structures</i> , or its latest version.	<ul style="list-style-type: none"> Interviews with facility personnel on 24/03/22 and 28/03/22 	No demolition work has been carried out during the Audit Period.	Not triggered	
9	The Proponent shall ensure that the plant and equipment used on site, or in connection with the project, is:	<ul style="list-style-type: none"> Site visit on 24/03/22 	A register of training was provided for MBT personnel as well as a sample Statement of Attainment.	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	(a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	<ul style="list-style-type: none"> Interviews with facility personnel on 24/03/22 and 28/03/22 Veolia, Employee Training Records.xlsx Statement of Attainment, Operate a gantry or overhead crane, 05/08/20 Veolia, Fixed Plant Prestart.pdf, including: <ul style="list-style-type: none"> WL MBT – Daily Scada Inspection Checklist, 16/03/22 WL MBT – Crane Pre-Start Checklist, 16/03/22 Veolia, Mobile Plant Prestart.pdf, including: <ul style="list-style-type: none"> Daily Loader Pre-Start, Loader 3, 21/03/22; Daily Excavator Pre-Start, Shredder TDSV20; Mobile Trommel Pre-Start, 20/03/22; Daily Phelps Tipper Pre-start Checklist, 20/03/22; Daily Tug Truck Pre-Start Checklist, 20/03/22 Daily Telehandler Prestart, 20/03/22 	<p>Samples of pre-start check records were provided for fixed and mobile plant.</p> <p>The Veolia Asset Management System (VAMS) was viewed and samples of maintenance records such as Work Orders were provided for a number of controls (e.g. Biofilters, Fire Systems).</p> <p>Veolia utilise the RIVO system for carrying out inspections and audits.</p> <p>During the site visit, a Colombia Tipper was observed in operation unloading FOGO into the Organic Buffer Building. It was observed that a patch of soil was stained beneath its fuel tank indicating a possible leak. Veolia advised that the Colombia Tipper had recently been acquired from the Woodlawn Bioreactor site. A pre-start record was provided on request for the day of the site visit, dated 24/03/22 (or 24/02/22, handwriting is a bit unclear). It indicated that there were no fuel or oil leaks.</p> <p>Overall this condition is considered compliant.</p> <p>The Auditors recommend as an Opportunity for Improvement (OFI) that the possible fuel leak of the Colombia Tipper be investigated 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. Contaminated soil should be cleaned up. Review a risk assessment for the Columbia Tipper to assess whether the fuel tank should be provided with secondary containment or other improved controls.</p>		

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> ○ Daily Colombia Tipper Pre-Start, 24/03/22 • Various Work Orders from the Veolia Asset Management System (VAMS) for Bio Filters 1 & 2; Annual Fire System Service; Monthly Fire System Service • Poo Carters, AWTS Quarterly Service Report for Owner & Council, 07/03/22 			
10 (as modified)	Schedule 4 of this approval continues to apply to the MBT Facility until the commencement of operation of the SRF Processing Area at which time Schedule 6 will apply to both the MBT Facility and the SRF Processing Area.	<ul style="list-style-type: none"> • Interviews with facility personnel on 24/03/22 and 28/03/22 	Schedule 4 still applies. Facility personnel advised that the development of an SRF Processing Area has not proceeded.	Compliant	
11 (as modified)	Schedule 5 of this approval applies to construction and operation of the SRF Processing Area only.	<ul style="list-style-type: none"> • Interviews with facility personnel on 24/03/22 and 28/03/22 		Not triggered	

Schedule 3 – Special Environmental Conditions – Woodlawn Mechanical Biological Treatment Facility**WASTE MANAGEMENT**

1	The Proponent shall only receive waste on site that has been railed to the Crisps Creek Intermodal Terminal from the Sydney Metropolitan Area. However, with the written approval of the Planning Secretary the Proponent may receive waste on site from LGAs outside the Sydney Metropolitan Area. In seeking this approval, the Proponent shall submit a detailed	<ul style="list-style-type: none"> • PWS Report full day (02-Mar-2022) • MBT Waste Tracking Records 22/03/19 – 24/03/22 • Interview with Facility Manager, Operations Supervisor, Process Engineer and Woodlawn 	Based on incoming waste records since the start of the Audit Period, receipt of waste has only been via Crisps Creek Intermodal Terminal which receives waste from Clyde Waste Transfer Station and Banksmeadow Transfer Terminal.	Compliant	
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Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	assessment of the potential impacts associated with the receipt of this waste, including the potential traffic and traffic noise impacts.	Precinct Environmental Officer			
2	<p>The Proponent shall not receive:</p> <p>(a) more than:</p> <ul style="list-style-type: none"> 240,000 tonnes of mixed waste a year on site; and 40,000 tonnes of garden waste on site; and <p>(b) waste on site that is:</p> <ul style="list-style-type: none"> contaminated by chemicals and/or pathogens that would not be rendered harmless by operations on site, or that may constitute a health or environmental risk, including clinical and related waste and diseased carcasses; and classified as hazardous waste or industrial waste. 	<ul style="list-style-type: none"> MBT Waste Tracking Records 22/03/19 – 24/03/22 AEMRs dated: <ul style="list-style-type: none"> December 2019 December 2020 December 2021 	<p>According to waste inventory incoming records:</p> <ul style="list-style-type: none"> The following mixed waste has been received to site <ul style="list-style-type: none"> 22/03/19 – 31/12/19 – 97,520 tonnes 01/01/20 – 31/12/20 – 124,518 tonnes 01/01/21 – 31/12/21 – 143,793 tonnes 03/01/22 – 24/03/22 – 27,830 tonnes The following food and garden waste has been received to site <ul style="list-style-type: none"> 28/02/22 – 21/03/22 – 174 tonnes <p>It should be noted that under the EPL, a maximum limit of 144,000 tonnes per year of general solid waste (putrescible) is permitted to account for Stage 1 (refer to Condition L3.1 in EPL).</p>	Compliant	
3	<p>The Proponent shall:</p> <p>(a) implement suitable procedures to:</p> <ul style="list-style-type: none"> ensure that the site does not accept wastes that are prohibited; and screen incoming waste loads; and <p>(b) ensure that:</p> <ul style="list-style-type: none"> all waste sludges and wastes that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; and staff receive adequate training in order to be able to recognise and handle any hazardous or other unapproved waste. 	<ul style="list-style-type: none"> Employee Training Records Interview with Facility Manager, Operations Supervisor, Process Engineer and Woodlawn Precinct Environmental Officer Waste Receipt and Control Plan, Woodlawn Mechanical Biological Treatment Facility, Veolia, 02/02/22 WL-MBT Operation in Reception & Pre- 	<p>Screening procedures observed at the Woodlawn MBT include:</p> <ul style="list-style-type: none"> Screening of waste in the receival pit via observation where foreign objects are identified and separated; and During pre-treatment in the Biological Rotating System (BRS) drums where heavy material is separated. <p>Rejected material from the screening process is transferred to the Woodlawn Bioreactor. All waste is processed during the BRS pre-treatment and liquids removed via leachate drainage. Internal procedures and screening of foreign or reject materials were observed during the site inspection. It is understood</p>	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<p>treatment Procedure, Veolia 14/05/19</p> <ul style="list-style-type: none"> WL – MBT Removal of Non Confirming Waste Received in Reception Pit, Veolia 02/03/21 Copies of training certificates for 'opearting a gantry or overhead crane' 	<p>staff undertake JSEAs prior to each work activity and are trained annually, or when required.</p> <p>Veolia have advised waste sludge is not received at the site and is screened out at Clyde Waste Transfer Station and Banksmeadow Transfer Terminal prior to delivery at Crisps Creek Intermodal Terminal.</p>		
4 (as modified)	<p>Except for the following, the Proponent shall dispose of all outputs produced on site to the Woodlawn Landfill:</p> <p>(a) recyclables extracted and delivered off-site for resource recovery purposes;</p> <p>(b) restricted solid waste and hazardous waste extracted from the input waste stream and lawfully disposed of off-site; and</p> <p>(c) compost output products approved for use under the POEO Act and Regulations.</p> <p><i>Note: This approval does not alter the restrictions on input rates in the current approval for the Woodlawn Landfill in any way.</i></p>	<ul style="list-style-type: none"> MBT Waste Tracking Records 22/03/19 – 24/03/22 2017 OEMP Draft OEMP (Rev 0.2, 02/02/22) Site visit on 24/03/22 Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer NSW Government Gazette No 114 of 2 November 2018 Resource Recovery Exemption – The Woodlawn organic outputs acid mine tailings trail exemption 2020 Resource Recovery Order– The Woodlawn organic outputs acid 	<p>The Waste Receipt Vehicle Control Plan, which is part of the OEMP, has been provided and approved by DPE and reviewed by the Auditors during the previous audit period. A revised Waste Receipt Vehicle Control Plan is currently being drafted and reviewed by DPE as part of the revised OEMP.</p> <p>The Auditors have reviewed outgoing waste inventory records; the draft Waste Receipt Vehicle Control Plan; and sighted waste outputs during site visit. Recyclable material (i.e. ferrous metals) are reported to be transported via a third party contractor. No restricted solid waste and hazardous waste have been reported at the Woodlawn MBT.</p> <p>The Resource Recovery Exemption specific to Veolia and industry general Exemption were revoked in October 2018. As such, product from the Woodlawn MBT is disposed of to the Woodlawn Bioreactor. A site-specific Resource Recovery Order and Exemption had subsequently been issued by the EPA to enable the application of compost to land in areas at the Woodlawn site. The Order imposed the requirements that must be met by the Woodlawn MBT, as the supplier of the compost derived from mixed waste.</p>	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<p>mine tailings trail order 2020</p> <ul style="list-style-type: none"> • Veolia Solid Waste MBT -WOO Sampling Procedure PRO-15198-1 dated 01/02/21 • PWS Report 29/03/22; 13/01/22 • WOO Quality Monitoring – Results Summary • Veolia Statement of Compliance – Reporting Period 16/11/21 – 13/01/22 • Envirolab Certificate of Analysis 286924 • Envirolab_WMBT_COC_1000T_Weekly_Testing_PS-20220114-WMBT 	<p>An additional Resource Recovery Exemption and Order was granted on 13 and 14 May 2020 to 14 May 2025 which applies to organic outputs to be trialled for the rehabilitation of acid mine tailings at the Woodlawn Zinc-Copper Project Mine site. In accordance with the Resource Recovery Order, Veolia were required by EPA to undertake specific sampling requirements. A selection of document has been provided and reviewed by the Auditors to confirm compliance.</p>		
5	<p>Within 3 years of commissioning the plant on site, or as directed by the Planning Secretary, the Proponent shall:</p> <p>(a) review the criteria in condition 4(c) above in consultation with the EPA with a view to moving to approved criteria under the POEO Act and Regulations or establishing criteria that are specifically appropriate for the use in mine rehabilitation at the adjoining Woodlawn mine; and</p> <p>(b) comply with any revised criteria set under the POEO Act and Regulations or by the Planning Secretary.</p>	<ul style="list-style-type: none"> • Resource Recovery Exemption – The Woodlawn organic outputs acid mine tailings trail exemption 2020 • Resource Recovery Order– The Woodlawn organic outputs acid mine tailings trail order 2020 • Letter from NSW EPA dated 13/05/20, Resource Recovery Order and Exemption 	<p>Within 3 years of commission the plant, Veolia has been granted an additional Resource Recovery Exemption and Order on 14 May 2020 to 14 May 2025 which applies to organic outputs to be trialled for the rehabilitation of acid mine tailings at the Woodlawn Zinc-Copper Project Mine site. The Auditors have reviewed outgoing waste inventory records; the draft Waste Receipt Vehicle Control Plan; and sighted waste outputs during site visit confirming compliance with the revised criteria.</p>	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		for Woodlawn Organic Outputs <ul style="list-style-type: none"> • MBT Waste Tracking Records 22/03/19 – 24/03/22 • Draft OEMP (Rev 0.2, 02/02/22) • Site visit on 24/03/22 • Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer 			
6	The Proponent shall prepare and implement a Waste Monitoring Program for the project to the satisfaction of the Planning Secretary. This program must: <ul style="list-style-type: none"> (a) be prepared in consultation with EPA by a suitably qualified and experienced expert; and (b) include a suitable program to monitor the: <ul style="list-style-type: none"> • quantity, type and source of waste received on site; and • quantity, type and quality of the outputs produced on site. 	<ul style="list-style-type: none"> • 2017 OEMP • OEMP approval by DPE (24/01/17) • Draft OEMP (Rev 0.2, 02/02/22) • MBT Waste Tracking Records 22/03/19 – 24/03/22 • Waste Receipt and Control Plan, Woodlawn Mechanical Biological Treatment Facility, Veolia, 02/02/22 • Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer 	<p>A waste management system has been incorporated into the OEMP and Veolia had consulted DPE and EPA in producing this program. The waste management system incorporates a Waste Receipt and Vehicle Control Plan. The Auditors have reviewed the plan during the previous audit period. A revised waste receipt and control plan is currently being drafted and under review by DPE as part of the Draft OEMP (Rev 0.2, 02/02/22).</p> <p>The Plan details waste transport vehicles entering and exiting the site are weighed on a weighbridge to confirm the weight of waste entering and deposited at the site.</p> <p>The information is maintained through a Paperless Weighbridge System (PWS) and provides the following information:</p> <ul style="list-style-type: none"> • Date • Vehicle Registration • Customer • Waste type • Gross and Tare Weight 	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			<ul style="list-style-type: none"> Gross and Tare Time PWS Docket Number <p>It should be noted that within the Waste Receipt and Vehicle Control Plan, the receipt of solid waste is from municipal, commercial and industrial sources within the Sydney Metropolitan Area. The material is initially screened at the Clyde Waste Transfer Station and Banksmeadow Transfer Terminal prior to transportation to the Woodlawn MBT via Crisps Creek Intermodal.</p>		
CONSTRUCTION, OPERATION & REHABILITATION					
7	<p>The Proponent shall:</p> <p>(a) ensure the floor of the waste processing building (see figure in Appendix 1) is comprised of a concrete pad that is at least 10cm thick;</p> <p>(b) install a leachate barrier system on any surface to be used for the direct impoundment of leachate, such as the composting and other outdoor areas;</p> <p>(c) ensure that this leachate barrier system:</p> <ul style="list-style-type: none"> has a re-compacted clay or modified soil layer that is at least 60 centimetres thick and has an in-situ coefficient of permeability of less than 1×10^{-7} mis, or some other suitable liner approved by EPA; and drains to the leachate dams at a minimum gradient of 0.5%; <p>(d) collect all leachate in the leachate dams to prevent it from escaping from the site to surface water, groundwater or subsoil;</p> <p>(e) treat all water from waste storage or handling areas, including the organic waste</p>	<ul style="list-style-type: none"> 2019 IEA Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 Veolia, Soil, Water & Leachate Management Plan For Woodlawn Mechanical Biological Treatment Facility, Rev 1, Final, 19/01/17 (2017 SWLMP) Veolia, Soil, Water & Leachate Management Plan For Woodlawn Mechanical Biological Treatment Facility, Rev 0.2, Second draft, 02/02/22 (Draft SWLMP (Rev 0.2, 02/02/22)) Stormwater Plan (Appendix D1.2 in Draft SWLMP), including: 	<p>There have been no planned changes to the waste processing buildings' floors, the leachate barrier system or the leachate ponds during the Audit Period.</p> <p>The 2017 SWLMP, which is part of the OEMP, has been designed to ensure contaminated water and/or leachate drains to the Leachate Aeration Pond. The following information has also been provided as part of the SWLMP:</p> <ul style="list-style-type: none"> The floor of the processing buildings that comes in contact with waste and any other operational areas likely to be in contact with leachate, have been constructed with concrete at least 10cm thick of concrete. A leachate barrier system was installed as per requirements detailed in condition (c) in the compost storage area, to ensure the direct impoundment of leachate within this area. Leachate is collected in the Leachate Aeration Pond, which is now referred to as the Western Aeration Pond. It can spill over to the Eastern Evaporation Pond. <p>Both the 2017 SWLMP and the SWLMP (Rev 0.2, 02/02/22) included a Verification of Compliance letter</p>	Non-compliant	NC1

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p>storage area, or that has been contaminated by leachate, as leachate;</p> <p>(f) ensure that the leachate dams:</p> <ul style="list-style-type: none"> are capable of accepting a 1 in 10-year, 24-hour duration storm event without overflowing; have a re-compacted clay or modified soil layer that is at least 90 centimetres thick and an in-situ coefficient of permeability of less than 1×10^{-9} m/s, or some other suitable liner approved by EPA; have sides with a slope of less than 1 vertical to 3 horizontal; and have a 0.5 metre freeboard at all times. 	<ul style="list-style-type: none"> CostinRoe Consulting Pty Ltd, Concept Stormwater Plan, Sheet 1, Drawing No C012424.00-C401, Issue G, 19/12/14 CostinRoe Consulting Pty Ltd, Concept Stormwater Plan, Sheet 2, Drawing No C012424.00-C402, Issue 3, 11/05/16 aPlus Plumbing Letter to Lipman Pty Ltd, Re: Veolia MBT Woodlawn Subcontract No: 1404-6300, Subcontract No: 1404-6300 Design and Construct Hydraulic Services, Verification of Compliance – Leachate Barrier System, 24/11/16 earth2water Pty Ltd (E2W), Woodlawn MBT: Construction Quality Control Assurance for Leachate Evaporation Dam (MBT Pond East), 06/09/17 E2W Letter to Veolia, Re: Fix of leachate pond 	<p>(24/11/16) with supporting documentation, that addressed both the leachate barrier system and the liner for the Western Aeration Pond.</p> <p>E2W issued a separate Construction Quality Control Assurance (CQCA) report for the Eastern Evaporation Pond.</p> <p>Following the 10/12/21 freeboard exceedance, Veolia engaged E2W and Divals Pty Ltd (responsible for constructing the Eastern Evaporation Pond) to carry out spillway alteration works on the 'MBT leachate dam' to increase the capacity of the dam. Based on the E2W report (07/02/22), the Auditors observe that:</p> <ul style="list-style-type: none"> The location of the work is not clear. E2W indicated that the work was on the NW corner of the MBT leachate dam however, during the site inspection, Veolia showed the Auditors where work on the dam had been carried out including construction of a small additional pond, which was at the north-eastern corner of the Eastern Leachate Pond, closest to the MBT Stormwater Ponds. You can see the Evaporation Dam 2 (ED2) in the background of E2W's photographs A LandTeam drawing (211273-DS01-01) attached to the E2W report shows the "new leachate pond" to be in the north-eastern corner of the Eastern Leachate Pond. The "imported brown silty clay" that was used to alter the spillway was from an unspecified "offsite location" and "E2W estimate[d] the permeability (K) of the imported material at approximately E-09 m/sec and suitable for the spillway works". It is not clear if the E2W report included validating construction of the new leachate pond connected by the spillway. 		

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<p>spillway at the MBT Site, 07/02/22</p> <ul style="list-style-type: none"> • Veolia, SCADA Trends for ALT4301: <ul style="list-style-type: none"> ○ Leachate level records from SCADA-1.PNG ○ Leachate level records from SCADA-2.PNG • Veolia, WL – MBT Weekly Process Checklist for: <ul style="list-style-type: none"> ○ 30/11/21 ○ 31/01/22 ○ 21/02/22 ○ 07/03/22 • Veolia, Site Inspection Checklist for 31/12/21 	<p>Based on this information, the Auditors consider that Condition 7(f) requirements may not have been fully met in relation to construction of the spillway and the 'new leachate pond' and therefore, the leachate barrier system may not be effective for the new spillway and pond. Water observed to be contained in the new leachate pond appeared to be clear and not leachate. There is no evidence that leachate has passed over/through the spillway assuming the work undertaken was above the highest level that the leachate during and following the incident. Therefore, this aspect is considered compliant on the basis that the spillway was not used for containing leachate. If the spillway were to be used in future, it could represent a non-compliance.</p> <p>There was no evidence observed during the site inspection that the leachate barrier system was not functioning as per design.</p> <p>The Auditors make the following observations in relation to the freeboard monitoring conducted by Veolia:</p> <ul style="list-style-type: none"> • A strip of red and white hazard tape on a pole still marks the freeboard limit for daily visual monitoring purposes. The leachate level was below the hazard tape on the day of the site inspection. • Veolia monitor the capacity (m³) of the "leachate pond" as a percentage of the capacity at the freeboard limit (SCADA Process Control ALT4301). So 100% is at the freeboard limit. At the time of the site visit, ALT4301 was at 87.52%. A High Alarm is set at 95% and the High High Alarm is set at 100%. 		

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			<ul style="list-style-type: none"> Veolia provided two trends for the ALT4301 data, which is only available for 13 weeks (~08/12/21 to 08/03/22). It shows two peaks on 10/12/21 and 13/12/21 with a maximum reading of approximately 92.5%, which is below the freeboard limit, which is reportedly 100%. Veolia had advised the Auditors during the site visit that the level monitoring data was not accurate, which is borne out by the trend. It is also noted on a Site Inspection Checklist dated 31/12/21. The level monitor appears to be under-reporting the actual level in the Western Aeration Pond and therefore, can't be relied upon until the error is corrected. Veolia advised that facility personnel, primarily the Process Engineer, visually check the freeboard limit marker at the Western Aeration Pond on a daily basis. The Process Engineer also records the leachate pond level in the 'WL MBT Weekly Process Checklist'. The recorded leachate pond levels in the four checklists provided for November 2011 to March 2022 ranged from 789.39 m to 789.54 m, being the Reduced Level. It is not clear to the Auditors how the Reduced Level is measured. Based on LandTeam drawing (211273-DS01-01), the freeboard limit Reduced Level is 789.66. So on 07/03/22 the level in the Western Aeration Pond was 0.12 m (12 cm) below the freeboard limit. <p>This Condition is considered non-compliant because 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</p>		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			<p>well as improving controls to prevent a reoccurrence in the short term and longer term.</p> <p>Given that a process is already underway for the appropriate improvement(s) to be determined to the satisfaction of DPE, EPA and WaterNSW, the Auditors make only two recommendations relating to freeboard limit monitoring as follows:</p> <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. 		
8	<p>The Proponent shall manage windrow composting operations in accordance with <i>AS 4454-2003: Composts, Soil Conditioners and Mulches</i>, Appendix N, Best practice guidelines for Composting Systems, or other practices approved by the EPA.</p> <p>[Note: AS 4454 has been reissued in 2012 and Appendix N amended]</p>	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 Draft OEMP (Rev 0.2, 02/02/22) 	<p>Veolia advised the Auditors that they compost the waste in the enclosed Fermentation Building using Static Aerated Pile methodology. The compost is formed in windrows but the compost is not aerated by turning using loaders.</p> <p>Veolia's Draft OEMP (Rev 0.2, 02/02/22) states:</p> <ul style="list-style-type: none"> In relation to the MSW Process Flow in Section 3.3.1.4 Fermentation Building that their "fermentation processing Technology adheres to the Resource Recovery Order under part 9, Clause 93 of the Protection of the Environment Operations (waste) Regulation 2014 (The Order), generating a final compost product suitable to meet the output requirements of the Order"; 	Compliant	

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			<ul style="list-style-type: none"> In relation to the FOGO Process Flow in Section 3.3.2.3 Fermentation Building that the <i>"fermentation process Technology adheres to the Australian Standard AS4454-2012 Composts, soil conditioners and mulches"</i>. <p>The Auditors have no evidence to indicate that Veolia are not operating the composting operation in accordance with AS4454.</p>		
9	The Proponent shall: (a) implement suitable measures to prevent the unnecessary proliferation of litter both on and off site; and (b) inspect and clear the site (and if necessary, surrounding area) of litter on a daily basis.	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 Veolia, Site Inspection Checklist for 31/12/21 	<p>The Woodlawn MBT appears to be maintained in good condition with no litter observed outside around the buildings, drains, dams or waterway. The exception was along the western embankment opposite and parallel to the post-fermented FOGO windrow located along the western edge of the Maturation Pad. The litter was not obvious but comprised relatively small fragments of weathered plastic. It was observed that the FOGO windrow contained more visible quantities of plastic rubbish.</p> <p>The Site Inspection Checklist, which is understood to be used monthly, includes checking for litter. Facility personnel advised that they also check for litter on a daily basis.</p> <p>On the basis of the available evidence, this condition is considered compliant.</p> <p>The Auditors recommend as an OFI that Veolia 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.</p>	Compliant	
10	The Proponent shall:	<ul style="list-style-type: none"> Site visit on 24/03/22 	Measures for the management of pests, vermin and declared noxious weeds are outlined in the Eco-Precincts existing Pest and Weed Management Plan	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p>(a) implement suitable measures to manage pests, vermin and declared noxious weeds on 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 the 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>	<ul style="list-style-type: none"> Interviews with facility personnel on 24/03/22 and 28/03/22 Veolia, Site Inspection Checklist, Fermentation / Matpad / Leachate pond / Stormwater dam: <ul style="list-style-type: none"> 29/11/21; 31/12/21; 31/01/22; 28/02/22 Draft OEMP (Rev 0.2, 02/02/22) Pest and Weed Management Plan, part of the Woodlawn Bioreactor OEMP 	<p>(PWMP), which is also referenced in the Draft OEMP (Rev 0.2, 02/02/22). The Eco-Precinct's PWMP is incorporated into the Eco-Precinct's Landscape and Vegetation Monitoring Plan (LVMP), which is Appendix D 5 in the Landfill Environmental Management Plan (LEMP).</p> <p>A Site Inspection Checklist for Fermentation / Matpad / Leachate pond / Stormwater dam includes looking for signs of pests or vermin. It does not include noxious weeds.</p> <p>No evidence of significant weed infestations or pest and vermin issues were observed during the site inspection.</p>		
11	<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>	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 NSW Woodlawn – Eco-Precinct Emergency Response Plan, part of the OEMP (draft dated 19/ 01/17) (current version dated 01/08/18) Draft OEMP (Rev 0.2, 02/02/22) VAMS, Work Order, # Whole Fire System Service – Compliance – 	<p>An Emergency Response Plan has been implemented for the Eco Project Site. The Plan is inspected and reviewed annually. It was last re-issued on 11/03/22.</p> <p>The Draft OEMP (Rev 0.2, 02/02/22) refers to the following fire prevention measures:</p> <ul style="list-style-type: none"> A sprinkler system for the Maturation Pad to reduce the risk of fire. <p>The sprinkler system was not in operation during the site visit due to the ongoing wet weather. Puddles on the ground were still evident from the rain.</p> <p>An infrared camera system was observed monitors the windrows in the Fermentation Building for thermal hotspots that could develop into a fire. The Draft OEMP (Rev 0.2, 02/02/22) does not mention this system.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<p>1 Yearly, completed 23/11/21</p> <ul style="list-style-type: none"> • VAMS, Work Order, # Whole Fire System Service – 1 Monthly, completed 03/03/22 • VAMS, Work Order, # Yellow gear Fire suppression 6 monthly inspection, In progress, not dated • WORMALD, Record of Service, Pre-Engineered Systems, Foam, for: <ul style="list-style-type: none"> ○ Komatsu PC220 Material Handler, 10/02/22 ○ Komatsu WA430-6 Wheel Loader, 11/02/22 • Infinity Fire Protection, Routine Activity Test Results, Fire Detection Systems, for <ul style="list-style-type: none"> ○ 28/01/21 ○ 19/02/21 ○ 29/03/21 ○ 29/04/21 • Infinity Fire Protection, Routine Activity Test Results, General Sprinkler & Hydrant Pumpsets, for <ul style="list-style-type: none"> ○ 28/01/21 ○ 19/02/21 	<p>The Fire System appeared to be well-maintained by Infinity Fire Protection. A number of maintenance records were provided as evidence of maintenance. WORMALD service the fire suppression systems in the 'yellow gear' (e.g. Loaders).</p> <p>Veolia advised that a fire occurred on a conveyor belt. An Operator first detected the smell of smoke and on investigation found some smouldering waste on a conveyor belt. It was quickly extinguished through the application of water.</p>		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> ○ 29/03/21 ○ 29/04/21 			
12	Upon the cessation of waste operations, the Proponent shall decommission the project and rehabilitate the site to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> • Site visit on 24/03/22 • Interviews with facility personnel on 24/03/22 and 28/03/22 	Waste operations are ongoing.	Not Triggered	
13	The Proponent shall prepare and implement a Rehabilitation and Closure Plan for the project to the satisfaction of the Planning Secretary. This plan must be: (a) be prepared in consultation with EPA, SCA, Palerang Council and Goulburn Mulwaree Council by a suitably qualified and experienced expert whose appointment has been approved by the Planning Secretary; (b) be submitted to the Planning Secretary for approval at least 6 months prior to the eighth independent environmental audit of the project (see schedule 4), or as directed otherwise by the Planning Secretary; (c) define the objectives and criteria for rehabilitation and closure; (d) investigate options for the future use of the site; (e) describe the measures that would be implemented to achieve the specified objectives and criteria for rehabilitation and closure; (f) calculate the cost of implementing these measures; and (g) describe how the performance of these measures would be monitored over time.		This Audit is the second IEA. Therefore, this requirement is not triggered.	Not Triggered	
SOIL, WATER & LEACHATE MANAGEMENT					
14	Except as may be expressly provided in an EPL for the project, the Proponent shall		Refer to EPL Schedule 3 Condition L1.1 in Table A-2.	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> .				
15	The Proponent shall store all chemicals, fuels and oils used on site in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. These bunds shall be designed and installed in accordance with the requirements of all relevant Australian Standards, and/or EPA's Environmental Protection Manual <i>Technical Bulletin Bunding and Spill Management</i> .	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 Rapid Spray, Rapid Diesel, Active Diesel Tanks, Operator's Handbook 	<p>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 to it. It was not self-bunded and had no bunding or secondary containment, which appeared non-compliant. Veolia advised that the tank is only used for temporary storage for the purpose of transporting fuel to mobile plant and that "Once filling has been completed, the tanker is emptied and replaced once not in use. ... The Tank is always kept empty except for when in use". The Auditors did not verify whether the tank was empty during the site visit but accept that it was most likely empty. However, the concrete beneath the hose appeared stained from possible drips / small leaks.</p> <p>A ~1,000 L Intermediate Bulk Container (IBC) and a ~200 L drum of oil / chemicals were located on a portable bund, which appeared to have sufficient capacity. beneath the BRS Drums and against the north-western wall of the Reception Building. The bunded containers are located within a concrete paved area that drains to the Leachate Aeration Pond (LAP).</p> <p>A second IBC was observed to be unbunded. However, it is located below the BRS Drums and captures condensation / water (not leachate). Therefore, bunding is not considered necessary.</p> <p>Overall, the Auditors consider storage of chemicals, fuels and oils to be compliant.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			The Auditors recommend as an OFI that Veolia review the storage and handling of diesel in the portable diesel tank to ensure compliance with this condition (MP 06_0239, Schedule 3, Condition 15). Consider how the requirement for bunding with 110% capacity may be met during both storage and during filling activities.		
16	<p>The Proponent shall prepare and implement a Soil, Water and Leachate Management Plan for the project to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be submitted to the Planning Secretary for approval prior to carrying out any development on site;</p> <p>(b) be prepared by a suitably qualified and experienced expert;</p> <p>(c) be prepared in consultation with the EPA and SCA; and</p> <p>(d) include:</p> <ul style="list-style-type: none"> a site water balance; an erosion and sediment control plan; a stormwater management scheme; a surface water, groundwater and leachate monitoring program; and a surface water, groundwater and leachate response plan. 	<ul style="list-style-type: none"> Veolia, Soil, Water & Leachate Management Plan For Woodlawn Mechanical Biological Treatment Facility, Rev 1, Final, 19/01/17 (2017 SWLMP) EPA letter to Veolia, Woodlawn Landfill – EPL 20476 – Licence Variation Notice 1614231- DRAFT for comment, 14/12/21 Veolia, Soil, Water & Leachate Management Plan For Woodlawn Mechanical Biological Treatment Facility, Rev 0.2, Second draft, 02/02/22 (Draft SWLMP (Rev 0.2, 02/02/22)) Veolia letter to DPE, Woodlawn Alternative Waste Technology Project (MP 06_0239) Food and Garden Organics process 	<p>The 2017 SWLMP was Appendix D1 in the approved 2017 OEMP during the Audit Period and was available on the project website.</p> <p>However, the SWLMP was in the process of being updated and revised in 2021 through to 2022, along with the OEMP, for submission to the EPA in support of an application to vary EPL 20476 for the facility to receive food waste.</p> <p>The Draft SWLMP (Rev 0.2, 02/02/22) was submitted with the Draft OEMP (Rev 0.2, 02/02/22) to DPE on 14/03/22 and on 21/03/22, DPE requested Veolia to “provide additional information before accepting the document”, which comprised provision of the SWLMP in pdf format.</p> <p>An earlier version of the Draft SWLMP (Rev 0.1) was provided to the EPA for comment but in the EPA’s letter dated 14/12/21, the EPA stated “that draft changes to the Management Plans submitted as part of this licence variation were for reference only. Any updates to the Managements Plans must be submitted and approved by the Director General”.</p> <p>Veolia had not consulted SCA / WaterNSW in relation to revision of the SWLMP during the Audit Period.</p>	Non-compliant	NC2

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<p>improvement and revised Environmental Management Plan, 14/03/22</p> <ul style="list-style-type: none"> DPE email to Veolia, Woodlawn MBT Facility - Revised OEMP for Woodlawn MBT - More Information Required, 21/03/22 Veolia email to WaterNSW, Fwd: Woodlawn Alternative Waste Technology Project (MP 06_0239) Food and Garden Organics process improvement and revised Environmental Management Plan, 31/03/22 Goulburn Mulwaree Council (GMC), Notice of Determination of an Application to Install an On-Site Sewage Management Facility, S68/0177/1516, 20/09/16 (GMC S68/0177/1516 Approval) MBT Surface Water - Site 140 (Point 8).xlsx Veolia email to DPE, Request For Information 	<p>However, Veolia subsequently sought to consult WaterNSW on 31/03/22.</p> <p>The Auditors consider that the Draft SWLMP (Rev 0.2, 02/02/22) addresses each of the requirements in Condition 16(d). The Auditors note that the SWLMP does not contain a separate 'erosion and sediment control plan' but Section 4.1 Soil Management addresses controls to manage sediment transport, albeit very briefly.</p> <p>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 make the following observations:</p> <ul style="list-style-type: none"> Surface water discharge monitoring results for EPA Point 8 (Site 140 MBT) indicate that Total Suspended Solids (TSS) exceeded the 100 percentile concentration limit on five occasions during the Audit period, since March 2021, representing 33% of the samples (5 out of 15). This indicates that soil erosion has most likely impacted the northern waterway. Stabilisation of earthen bunds and surfaces with vegetation / spray seeding between the Maturation Pad, the Leachate Storage System and the northern waterway has had limited success and some surfaces have been further destabilised by the earthworks responding to the December 2021 freeboard limit exceedance. Rows of haybales had been placed across the northern waterway at intermittent intervals to improve water quality. This may have resulted in 		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<p>(RFI-38091467) - Woodlawn Alternative Waste Technology Project (MP 06_0239), 11/03/22</p> <ul style="list-style-type: none"> DPE letter to Veolia, Woodlawn Mechanical Biological Treatment Facility (MP 06_0239), Incident notification – western leachate pond 0.5 m freeboard limit exceedance and transfer of leachate, 10 December 2021, 18/03/22 earth2water Pty Ltd (E2W), Woodlawn MBT: Construction Quality Control Assurance for Leachate Evaporation Dam (MBT Pond East), 06/09/17 Site visit on 24/03/22 Interviews on 24/03/22 and 28/03/22 	<p>an observed reduction in TSS concentration at EPA Point 8 since 13/12/21.</p> <ul style="list-style-type: none"> The Risk Ranking in Table 3.1 for Soil Erosion is low. It is considered that this is not accurate given the TSS exceedances at EPA Point 8. The specified controls have not been implemented and maintained adequately to be effective. The use of haybales as a control is not mentioned, possibly because it was intended as a temporary control measure following the incident. Erosion of the Leachate Storage System liner or leachate barrier system is not considered as a hazard or risk assessed. During the Audit Period, the site was initially subjected to drought but in the 12 months or more has experienced a significant increase in rainfall events associated with La Niña event and possibly climate change. Given the increased frequency and intensity of rainfall events associated with climate change, it is considered that the risk of soil erosion impacts has increased. Controls such as regular inspections of the liner for soil erosion (as recommended in Earth2Water CQCA report for the Leachate Evaporation Dam (MBT Pond East)) and repairs with similarly impervious liner material are not considered. Also refer to the findings and recommendations for Schedule 3, Condition 18. GMC's Approval S68/0177/1516 for the On-Site Sewage Management Facility (OSSMF), Condition 1(o), which is a WaterNSW requirement, requires that a <i>"bund shall be constructed to ensure the runoff from the effluent irrigation area shall not enter diversion drain 3"</i>. Section 4.2.3 of the SWLMP states that <i>"Treated effluent is disinfected and pumped to a small spray irrigation area"</i> 		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			<p><i>adjacent to the system for evaporation. The aim of this is to maintain a moist surface without waterlogging the area, causing potential runoff".</i></p> <p>Table 3.1 does not specifically consider the hazard of treated sewage effluent contaminating a waterway / diversion drain or the controls that may be in place (e.g. bund, maintenance).</p> <ul style="list-style-type: none"> • We also understand that two additional toilets are planned to be installed to cater for four additional personnel, and that the existing pump will be replaced with a larger capacity pump. Therefore, it is expected that the site water balance and potentially associated approvals and controls will need to reflect these proposed changes. • We understand the site water balance is currently being reviewed and updated. The main change since the 2017 SWLMP is the change in the leachate storage system with the addition of the Eastern Leachate Pond resulting in an increase in capacity from 1.9 ML to 7.1 ML leachate. • Table 5.2 erroneously indicates that EPA Point 8 is subject to monitoring of Total Dissolved Solids, which should be TSS. • Table 6.1 refers to the 'Surface Water Pond' as the only location subject to surface water performance measures, triggers and actions. It does not refer to other waterways such as the northern waterway or Allianoyonyiga Creek. • The Stormwater Plan in Appendix D1.2, which is a scaled drawing, is considered inaccurate because it does not reflect the current configuration and area of the Leachate Storage System comprising the Western Aeration Pond and the Eastern Evaporation Pond. It still refers to the former "<i>Leachate Aeration Pond</i>" that is now called the Western Aeration 		

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			<p>Pond. It also does not show the location of the OSSMF (i.e. the two tanks and the treated effluent irrigation area, although the latter is labelled but not delineated).</p> <ul style="list-style-type: none"> Table 6.1 in the 2017 SWLMP indicated that leachate would be pumped to the Reception Building pit in the event that freeboard was <0.5 m. This has changed in the Draft SWLMP (Rev 0.2, 02/02/22) to indicate that leachate would be pumped to a "nominated dam within the Eco Precinct". This is discussed further below. We understand this control measure change has yet to be formally approved of DPE. <p>Further to the last point above, DPE noted that during an incident on 10/12/21 where the freeboard limit was exceeded, Veolia responded by transferring leachate from the Leachate Storage System to the dam ED3S-S located on the Woodlawn Bioreactor site (i.e. off-site) which was "in contravention of the Soil, Water and Leachate Management Plan, dated 19 January 2017, approved under Schedule 3, Condition 16 of the consent, which states ... In the event of a heavy storm, water from the leachate aeration pond will be pumped to the Reception Building pit to maintain a 0.5 m free board space".</p> <p>Implementation of the SWLMP is considered non-compliant on the basis that:</p> <ol style="list-style-type: none"> soil stabilisation and erosion controls have not been sufficiently effective to prevent TSS exceedances at EPA Point 8; and leachate was transferred to ED3S-S instead of the Reception Building pit in contravention of the approved SWLMP. 		

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			<p>The Auditors recommend that Veolia 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. Improved controls may include significantly improving soil stabilisation. Implement the improved controls.</p> <p>The Auditors understand that Veolia are seeking DPE approval to allow them to pump leachate to other leachate storage dams within the Woodlawn Eco Precinct in the event freeboard is <0.5 m. The Auditors make no recommendation on that matter.</p> <p>The Auditors recommend as an OFI that Veolia review and revise the Draft SWLMP in light of the other observations made, as follows:</p> <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; 		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			<ul style="list-style-type: none"> • 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. 		
17	The site water balance must: (a) identify the source of all water collected or stored on the site, including rainfall, stormwater and groundwater; (b) include details of all water use on site and any discharges; (c) describe the measures that would be implemented to minimise water use on site.	<ul style="list-style-type: none"> • 2017 SWLMP • Draft SWLMP (Rev 0.2, 02/02/22) • GMC's S68/0177/1516 Approval • Interviews on 24/03/22 and 28/03/22 	<p>As discussed above in Condition 16 findings and recommendations, the Auditors understand the site water balance is currently being reviewed and updated. Based on the Draft SWLMP (Rev 0.2, 02/02/22), the Auditors consider that the site water balance meets the requirements of Condition 17. However, as noted above, 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.</p> <p>If it has not already been considered, the Auditors recommend as an OFI that the site water balance accounts for the proposed increase in sewage requiring treatment and the mechanical evaporation in the Leachate Evaporation Dam.</p>	Compliant	
18	The erosion and sediment control plan must: (a) be consistent with the requirements in the latest version of <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom); (b) identify the activities on site that could cause soil erosion and generate sediment; and (c) describe what measures would be implemented to: <ul style="list-style-type: none"> • minimise soil erosion and the transport of sediment to downstream waters, including the location, function and 	<ul style="list-style-type: none"> • 2017 SWLMP • Draft SWLMP (Rev 0.2, 02/02/22) • MBT Surface Water - Site 140 (Point 8).xlsx 	<p>As discussed in Condition 16 findings and recommendations, the Draft SWLMP (Rev 0.2, 02/02/22) includes a basic description of erosion and sediment controls in Section 4.1 Soil Management, which the Auditors consider generally meets the requirements of Condition 18 to describe the measures that would be implemented.</p> <p>However, the description of the erosion and sediment controls is limited and is not considered typical of an erosion and sediment control plan (ESCP) that would meet the requirements of <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom). In particular, the ESCP does not describe individual erosion and sediment</p>	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p>capacity of any erosion and sediment control structures; and</p> <ul style="list-style-type: none"> maintain these structures over time. 		<p>controls including their location, function and capacity but instead provides broad descriptions. For example, one of the controls is "Batters around the site including diversion channels and cuts are stabilized by the local council recommended "con seed mix"", whereas there are multiple different batters and bunds that could present a source of soil erosion, and the slope of a batter is also relevant in addition to soil stabilisation techniques such as using vegetation or boulders / gravel. ESCPs are often presented visually on a site plan that shows the locations and types of control measures used onsite.</p> <p>As discussed in the findings and recommendations for Schedule 3, Condition 16, and in light of the December 2021 incident, erosion of the leachate barrier system and leachate dam liner is a hazard that requires management and maintenance. Also refer to the findings and recommendations for Condition 16, particularly in relation to maintenance of the Leachate Management System liner.</p> <p>The Auditors recommend as an OFI that Veolia 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.</p>		
19	<p>The stormwater management scheme must:</p> <p>(a) be consistent with the guidance in the latest version of <i>Managing Urban Stormwater: Council Handbook</i> (DEC);</p> <p>(b) be capable of capturing and storing all rainfall and stormwater runoff from areas where waste (including organic outputs) is</p>	<ul style="list-style-type: none"> 2017 SWLMP Draft SWLMP (Rev 0.2, 02/02/22) 	<p>The stormwater management scheme was described in Section 4.2.2 of the 2017 SWLMP and a Stormwater Plan was provided in Appendix D1.2. That has essentially remained unchanged in the Draft SWLMP (Rev 0.2, 02/02/22) except for the following:</p> <ul style="list-style-type: none"> The stormwater management scheme is now referred to as a stormwater management plan; 	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	handled up to an including a 1 :100-year, 24-hour duration storm event: and (c) include the detailed plans for the proposed surface water management system (shown conceptually in Appendix 4).		<ul style="list-style-type: none"> The capacity of the rainwater tank reduced from 30 kL to 20 kL. <p>It is considered that Condition 19 requirements are met in the Draft SWLMP (Rev 0.2, 02/02/22).</p> <p>The Auditors recommend as an OFI that Veolia 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.</p>		
20	<p>The surface water, groundwater, and leachate monitoring program must:</p> <p>(a) be generally consistent with the guidance in EPA's <i>Environmental Guidelines for Composting & Related Organics Processing Facilities</i>; and</p> <p>(b) include:</p> <ul style="list-style-type: none"> baseline data; details of the proposed monitoring network; and the parameters for testing and respective trigger levels for action under the surface water, groundwater and leachate response plan (see below). 	<ul style="list-style-type: none"> 2017 SWLMP Draft SWLMP (Rev 0.2, 02/02/22) MBT Surface Water - Site 140 (Point 8).xlsx 	<p>The surface water, groundwater, and leachate monitoring program is described in Section 5 of the SWLMP. Whilst the program in the Draft SWLMP (Rev 0.2, 02/02/22) does not appear to have changed significantly compared to the 2017 SWLMP, the following observations are made:</p> <ul style="list-style-type: none"> The groundwater monitoring well, EPA Point 11, had been installed; Section 5.1.1.4 Leachate does not refer to the requirement to monitor leachate quality (i.e. EPA Point 12); Table 5.2 is inconsistent with EPL 20476 monitoring requirements: <ul style="list-style-type: none"> TSS is required to be monitored at EPA Point 8 (Site 140), not Total Dissolved Solids (TDS); Six monthly monitoring requirements for EPA Point 11 are not specified; The parameters for six monthly monitoring requirements for EPA Point 12 are not specified but only referred to as an "Extended Suite" The respective trigger levels for action for the various parameters, aspect and locations are not specified relative to EPL 20476 concentration limits or specified baseline data 	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			<p>where available (e.g. Table 5-1 for surface water). Section 5.1 refers to the EPA's <i>Environmental Guidelines for Composting & Related Organics Processing Facilities</i> (DEC, 2004) and the <i>Australian Water Quality Guidelines for Fresh and Marine Waters</i> (ANZECC, 2000) but does not provide measurable assessment criteria to compare against.</p> <p>The Auditors observe that Section 5.1.1.3 refers to a monitoring well called "MB7&", which is a suspected typographical error.</p> <p>The Auditors observed that the monitoring method was previously specified in part in Table 5.2 of the 2017 SWLMP but has been dropped from the same table in the Draft SWLMP (Rev 0.2, 02/02/22). Condition M2.3 of EPL 20476 specifies the required monitoring method (e.g. Grab sample or Probe) for each parameter. Based on monitoring results for EPA Point 8, pH was not always sampled with a Probe as required, which is non-compliant. Therefore, it is recommended that the monitoring method be clearly specified in order to prevent misunderstanding of the requirements.</p> <p>The Auditors consider that the Draft SWLMP (Rev 0.2, 02/02/22) does not meet all of the requirements of Condition 20. But given that Draft SWLMP (Rev 0.2, 02/02/22) has yet to be finalised, the Auditors consider Condition 20 is compliant.</p> <p>The Auditors recommend as an OFI that the surface water, groundwater, and leachate monitoring program be reviewed and revised,</p>		

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			based on the identified gaps/issues detailed in these findings, in order to ensure it meets all of the requirements of Condition 20 and EPL 20476.		
21	The surface water, groundwater and leachate response plan must: (a) include a protocol for the investigation, notification and mitigation of any exceedances of the respective trigger levels; and (b) describe the array of measures that could be implemented to respond to any surface or groundwater contamination that may be caused by the development.	<ul style="list-style-type: none"> 2017 SWLMP Draft SWLMP (Rev 0.2, 02/02/22) 	<p>The surface water, groundwater and leachate response plan is detailed in Section 6 of the Draft SWLMP (Rev 0.2, 02/02/22). Performance measures / triggers and an array of possible actions are detailed in Table 6.1. The exception is performance measures / triggers for groundwater in EPA Point 11. As noted in the findings and recommendations for Condition 20, the baseline data and performance / assessment criteria for groundwater has not been provided.</p> <p>The Draft SWLMP (Rev 0.2, 02/02/22) has yet to be finalised, the Auditors consider Condition 20 is compliant.</p> <p>The Auditors recommend as an OFI that performance measures / triggers be included for groundwater.</p>	Compliant	
ODOUR					
22 (as modified)	The Applicant shall ensure that the project does not cause or permit the emission of offensive odour (as defined in the POEO Act).	<ul style="list-style-type: none"> Site visit on 24/03/22 AEMRs dated: • December 2019 • December 2020 • December 2021 Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer Eco-Precinct Complaints Register 2019 – 2022 	<p>Offensive odours were observed during the site inspection; specifically, outside of the reception building, organic buffer storage and fermentation building when doors were open.</p> <p>No odour complaints are recorded on the complaints register in relation to the Woodlawn MBT. Odour complaints have been received for the Bioreactor and have increased from 32 in 2019, 20 in 2020 to 302 in 2021. Veolia have advised that not all odour complaints have had the source fully investigated.</p> <p>The Auditors have reviewed the Independent Odour Audits (IOA) conducted in 2019, 2020 and 2021 by The</p>	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> Woodlawn Bioreactor Expansion Project IOA #7, #8 and #9 Woodlawn Eco-Precinct IOA 2021 Recommendation Responses Consultation with the EPA representative Work Order Monthly Inspections – Bio Filters 1 & 2, Veolia, 20/03/22 	<p>Odour Unit Pty Ltd for the Woodlawn Waste Expansion Project and observed the Odour Unit currently undertaking their 2022 audit at the site. Following the 2021 IOA, it was recommended for increased overall management of the biofilters. The Auditors observed and discussed the Veolia Asset Maintenance (VAM) system and the biofilters onsite as well as monthly inspection records. The Auditors consider continued maintenance by Veolia is ongoing. It should be noted that the Auditors observed overgrown weeds on biofilter 2 and 3 during the site visit which Veolia have advised are being controlled by pesticides.</p> <p>Based on the available evidence, the Auditors consider that the odours emitted by the Woodlawn MBT are actively being managed.</p> <p>The Auditors note that the EPA have flagged the requirement for management of the biofilters are in accordance with management plans and manuals. The Auditors recommend continued management of the biofilters should be undertaken in addition to a review of building enclosures onsite to ensure odours are effectively being managed onsite.</p>		
AIR QUALITY					
23	The Proponent shall ensure that dust generated by the project does not cause additional exceedances of the criteria listed in Tables 1 to 3 at any residence on, or on more than 25 percent of, any privately-owned land.	<ul style="list-style-type: none"> Draft OEMP (Rev 0.2, 02/02/22) Site visit on 24/03/22 Interviews on 24/03/22 and 28/03/22 2019 AEMR 2020 AEMR 2021 AEMR 	<p>The Draft OEMP (Rev 0.2, 02/02/22) outlines dust control measures. No dust was observed during the site visit as it had been raining recently.</p> <p>Dust monitoring is undertaken monthly at three depositional dust gauges (DG28, DG33, DG34), two of which are also used to monitor the Woodlawn Eco Precinct (DG28, DG34). Only DG28 is located near a residence. Results are provided and summarised in</p>	Non-compliant	NC3

24 May 2022

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#																																																													
	<div>Table 1: Long term impact assessment criteria for particulate matter</div> <table><tr><th>Pollutant</th><th>Averaging period</th><th>Criterion</th></tr><tr><td>Total suspended particulate (TSP) matter</td><td>Annual</td><td>90 µg/m³</td></tr><tr><td>Particulate matter < 10 µm (PM10)</td><td>Annual</td><td>30 µg/m³</td></tr></table> <div>Table 2: Short term impact assessment criteria for particulate matter</div> <table><tr><th>Pollutant</th><th>Averaging period</th><th>Criterion</th></tr><tr><td>Particulate matter < 10 µm (PM10)</td><td>24 hour</td><td>50 µg/m³</td></tr></table> <div>Table 3: Long term impact assessment criteria for deposited dust</div> <table><tr><th>Pollutant</th><th>Averaging period</th><th>Maximum increase in deposited dust level</th><th>Maximum deposited dust level</th></tr><tr><td>Deposited dust</td><td>Annual</td><td>2 g/m²/month</td><td>4 g/m²/month</td></tr></table> <div>Note: Deposited dust is assessed as insoluble solids as defined by Standards Australia, 1991, AS/NZS 3580.10.1-2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulates - Gravimetric Method.</div>	Pollutant	Averaging period	Criterion	Total suspended particulate (TSP) matter	Annual	90 µg/m³	Particulate matter < 10 µm (PM10)	Annual	30 µg/m³	Pollutant	Averaging period	Criterion	Particulate matter < 10 µm (PM10)	24 hour	50 µg/m³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum deposited dust level	Deposited dust	Annual	2 g/m²/month	4 g/m²/month		<p>each Annual Environmental Management Report (AEMR).</p> <p>The AEMRs indicate that the annual average dust deposition as Insoluble Solids exceeded the criterion of 4 g/m²/month as follows, where the reporting period is from 9 September to 8 September:</p> <table><tr><th rowspan="2">Location</th><th colspan="3">Average Insoluble Solids (g/m²/month)</th></tr><tr><th>09/09/18 - 08/09/19</th><th>09/09/19 - 08/09/20</th><th>09/09/20 - 08/09/21</th></tr><tr><td>Point 4 (DG28, Pylara)</td><td>4.12</td><td>4.1</td><td>1.8</td></tr><tr><td>Point 6 (DG34, West Void)</td><td>4.57</td><td>4.6</td><td>1.8</td></tr><tr><td>Point 7 (DG33, Lot 69)</td><td>1.8</td><td>2.1</td><td>1.3</td></tr></table> <p>The Annual Returns indicate that the mean dust deposition as Insoluble Solids exceeded the criterion of 4 g/m²/month as follows, where the reporting period is from 22 December to 21 December:</p> <table><tr><th rowspan="2">Location</th><th colspan="3">Average Insoluble Solids (g/m²/month)</th></tr><tr><th>22/12/18 - 21/12/19</th><th>22/12/19 - 21/12/20</th><th>22/12/20 - 21/12/21</th></tr><tr><td>Point 4 (DG28, Pylara)</td><td>5.1</td><td>2.8</td><td>1.3</td></tr><tr><td>Point 6 (DG34, West Void)</td><td>5.0</td><td>2.78</td><td>5.1</td></tr><tr><td>Point 7 (DG33, Lot 69)</td><td>2.1</td><td>2.06</td><td>1.2</td></tr></table>	Location	Average Insoluble Solids (g/m²/month)			09/09/18 - 08/09/19	09/09/19 - 08/09/20	09/09/20 - 08/09/21	Point 4 (DG28, Pylara)	4.12	4.1	1.8	Point 6 (DG34, West Void)	4.57	4.6	1.8	Point 7 (DG33, Lot 69)	1.8	2.1	1.3	Location	Average Insoluble Solids (g/m²/month)			22/12/18 - 21/12/19	22/12/19 - 21/12/20	22/12/20 - 21/12/21	Point 4 (DG28, Pylara)	5.1	2.8	1.3	Point 6 (DG34, West Void)	5.0	2.78	5.1	Point 7 (DG33, Lot 69)	2.1	2.06	1.2		
Pollutant	Averaging period	Criterion																																																																
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Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			<p>The Auditors note that EPL 20476 does not specify a concentration limit for deposited dust.</p> <p>The Auditors observe a potential discrepancy in reported Insoluble Solids for Point 6 between the 2021 AEMR and Annual Return.</p> <p>There were exceedances (highlighted in yellow) 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. The Auditors observe that the dust levels closest to the MBT, DG33, were well below the criterion. DG28 and DG34 are more influenced by the Woodlawn Bioreactor operations.</p> <p>The Auditors observe that the exceedances were not reported as exceedances or non-compliances in the 2019 and 2020 AEMRs.</p> <p>The Auditors recommend that Veolia 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>		
24	The Proponent shall prepare and implement an Air Quality Monitoring Program for the project, in consultation with EPA, and to the satisfaction of the Planning Secretary. This program must be submitted to the Planning Secretary for approval prior to construction and include an air monitoring protocol for evaluating compliance with the air quality impact assessment criteria in this consent.	<ul style="list-style-type: none"> Draft OEMP (Rev 0.2, 02/02/22) Site visit on 24/03/22 Interviews on 24/03/22 and 28/03/22 Veolia, Environment Monitoring Program for Woodlawn Mechanical 	<p>The Environment Monitoring Program (2017) was assessed as compliant in the 2019 IEA.</p> <p>The deposited dust monitoring continued to be implemented during the Audit Period.</p> <p>The Auditors observe that the Draft OEMP (Rev 0.2, 02/02/22) refers to an Air Quality Monitoring Program in Section 3.5.3.5 Odour. This Condition relates to the</p>	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#								
	<p><i>Note: Initially, this program may concentrate on monitoring the dust deposition impacts of the project. However, in time, it may be expanded to include other pollutants.</i></p>	<p>Biological Treatment Facility, 19/01/17</p> <ul style="list-style-type: none">2019 IEA	<p>pollutants referred to in Condition 23, not odour, especially deposited dust, as per the Note. Therefore, referencing the Air Quality Monitoring Program in Section 3.5.3.5 Odour is not considered appropriate. The monitoring program for deposited dust is provided in the Environment Monitoring Program, which does not appear to have been revised since the 2019 IEA.</p> <p>The Auditors recommend as an OFI that the reference to the Air Quality Monitoring Program in the OEMP be in a section related to deposited dust and refer to the Environment Monitoring Program (OEMP Appendix E) as containing the Air Quality Monitoring Program.</p>										
NOISE													
25	<p>The Applicant shall ensure that the noise generated by the development does not exceed the limits in Table 4 (refer to Table in Consent).</p> <table><tr><td colspan="2">Table 4: Noise impact assessment criteria dB(A)</td></tr><tr><td>Receiver</td><td>Day/Evening/Night LAeq(15 minute)</td></tr><tr><td>Residences on privately-owned land (during construction)</td><td>40</td></tr><tr><td>Residences on privately-owned land (during operations)</td><td>35</td></tr></table> <p>Notes:</p> <p>a) Noise from the development is to be measured at the most affected point or within the residential boundary, or at the most affected point within 30 metres of a dwelling (rural situations) where the dwelling is more than 30 metres from the boundary, to determine compliance with the LAeq (15 minutes) noise limits in the above table. Where it can be demonstrated that direct measurement of noise from the project is impractical, the EPA may accept alternative means of determining compliance (see</p>	Table 4: Noise impact assessment criteria dB(A)		Receiver	Day/Evening/Night LAeq(15 minute)	Residences on privately-owned land (during construction)	40	Residences on privately-owned land (during operations)	35	<ul style="list-style-type: none">Draft OEMP (Rev 0.2, 02/02/22)Site visit on 24/03/22Interviews on 24/03/22 and 28/03/22Veolia, Environment Monitoring Program for Woodlawn Mechanical Biological Treatment Facility, 19/01/172019 IEA	<p>The Environment Monitoring Program indicates that noise monitoring is conducted “as required”. Veolia advised that no noise complaints were received during the Audit Period and therefore. no noise monitoring was conducted.</p> <p>No significant noise levels were observed during the site visit.</p>	Compliant	
Table 4: Noise impact assessment criteria dB(A)													
Receiver	Day/Evening/Night LAeq(15 minute)												
Residences on privately-owned land (during construction)	40												
Residences on privately-owned land (during operations)	35												

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#																						
	<p>Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy shall also be applied to the measured noise levels where applicable.</p> <p>b) The noise emission limits identified in the above table apply under meteorological conditions of:</p> <ul style="list-style-type: none">wind speeds of up to 3 mis at 10 metres above ground level; ortemperature inversion conditions of up to 3°C/100m, and wind speeds of up to 2 mis at 10 metres above ground level.																										
26	<p>The Proponent shall ensure that the traffic noise generated by the project on the road between the Crisps Creek Intermodal Terminal and the site access road does not exceed 60 dBA $L_{Aeq}(1 \text{ hour})$ at any residence on privately-owned land.</p> <p><i>Note: Traffic noise generated by the project is to be measured in accordance with the relevant procedures in the EPA's Environmental Criteria for Road Traffic Noise.</i></p>	<ul style="list-style-type: none">Site visit on 24/03/22Interviews on 24/03/22 and 28/03/222019 IEA	<p>This was assessed as compliant in the 2019 IEA.</p> <p>No traffic noise-related complaints have been received.</p>	Compliant																							
27 (as modified)	<p>The Proponent shall comply with the operating hours in Table 5, unless otherwise agreed by the Planning Secretary.</p> <p><small>Table 5: AWT Site Operating Hours</small></p> <table><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday - Friday</td><td>7 am – 6 pm</td></tr><tr><td>Saturday</td><td>7 am – 1 pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td>Waste Receipt</td><td>Monday - Saturday</td><td>6 am – 7 pm</td></tr><tr><td>Indoor Operations</td><td>Monday - Saturday</td><td>6 am – 10 pm</td></tr><tr><td>Outdoor Operations & Product Dispatch</td><td>Monday – Friday</td><td>6 am – 7 pm</td></tr><tr><td>Emergency</td><td>Monday - Sunday</td><td>Anytime</td></tr></table>	Activity	Day	Hours	Construction	Monday - Friday	7 am – 6 pm	Saturday	7 am – 1 pm	Sunday & Public Holidays	Nil	Waste Receipt	Monday - Saturday	6 am – 7 pm	Indoor Operations	Monday - Saturday	6 am – 10 pm	Outdoor Operations & Product Dispatch	Monday – Friday	6 am – 7 pm	Emergency	Monday - Sunday	Anytime	<ul style="list-style-type: none">Draft OEMP (Rev 0.2, 02/02/22)Site visit on 24/03/22Interviews on 24/03/22 and 28/03/22PWS Report full day (02-Mar-2022) (1).xlsxweek52 02-01-2022-165840.pdf	<p>Veolia advised that the facility’s operating hours comply with this condition. No evidence suggests otherwise.</p> <p>A sample PWS record indicates waste was received after 6am.</p>	Compliant	
Activity	Day	Hours																									
Construction	Monday - Friday	7 am – 6 pm																									
	Saturday	7 am – 1 pm																									
	Sunday & Public Holidays	Nil																									
Waste Receipt	Monday - Saturday	6 am – 7 pm																									
Indoor Operations	Monday - Saturday	6 am – 10 pm																									
Outdoor Operations & Product Dispatch	Monday – Friday	6 am – 7 pm																									
Emergency	Monday - Sunday	Anytime																									

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<i>Note: Operation of BRS Drums and associated infrastructure is permitted to occur over 24 hours</i>				
28	Within 3 months of the commencement of operations, or as directed by the Planning Secretary, the Proponent shall: (a) commission a suitably qualified and experienced expert whose appointment has been approved by Planning Secretary to audit the noise generated by the project during normal operations against the noise and road traffic noise criteria in this approval; (b) send a copy of the audit report to the Department and EPA within 7 days of the completion of the audit.	<ul style="list-style-type: none"> 2019 IEA 	This was assessed as compliant in the 2019 IEA.	Not triggered	
METEOROLOGICAL MONITORING					
29	For the life of the project, the Proponent shall ensure that there is a suitable meteorological station in the vicinity of the site that complies with the requirements in the <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i> guideline.	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews on 24/03/22 and 28/03/22 Woodlawn_Hourly to 14_03_22.xlsx Hydrometric Consulting Services, quarterly routine service and maintenance report 	The meteorological monitoring station continues to operate near the car park for the Woodlawn Eco Precinct Administration Building. Hourly monitoring data was available on request, as were quarterly routine service and maintenance reports.	Compliant	
TRANSPORT					
30 (as modified)	Deleted	<ul style="list-style-type: none"> MP 06_0239 MOD 1, 17/06/14 		Condition Deleted	
31 (as modified)	The Proponent shall: (a) provide sufficient car parking on site to accommodate the parking demand of the project; (b) ensure that the: <ul style="list-style-type: none"> car parking is constructed in accordance with the relevant requirements of 	<ul style="list-style-type: none"> MP 06_0239 MOD 1, 17/06/14 Veolia, Waste Receipt & Vehicle Control Plan, Woodlawn Mechanical Biological Treatment Facility, Rev 0.2, 	The Draft OEMP (Rev 0.2, 02/02/22) Site Plan and the Draft WRVCP (Rev 0.2, 02/02/22) indicate that 21 car parking spaces are provided for staff and visitors. However, during the site inspection it was observed that the car parking area had been extended east towards the Weighbridge and facility personnel confirmed that it was in the process of being extended	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p><i>Australian Standard AS 2890. 1-2004;</i> and</p> <ul style="list-style-type: none"> internal road network is constructed in accordance with the relevant requirements of <i>Australian Standard AS 2890.2-2002</i>. 	<p>Second draft, 02/02/22 (Draft WRVCP (Rev 0.2, 02/02/22))</p> <ul style="list-style-type: none"> Site visit on 24/03/22 	<p>and when completed will provide an additional 14 spaces towards the end of May 2022. This is considered sufficient for the site. Veolia advised that the WRVCP and OEMP Site Plan will be updated following completion of the work.</p> <p>There is no evidence that the car parking extension is being constructed in accordance with the relevant requirements of <i>Australian Standard AS 2890. 1-2004</i>. Veolia advised that the evidence will be provided following completion of the work.</p> <p>The Auditors recommend as an OFI that Veolia document that the car park extension has been constructed in accordance with AS 2890. 1-2004.</p>		
32 (as modified)	<p>The Proponent shall contribute to both Palerang Council and Goulburn Mulwaree Council for the maintenance of the relevant sections of Collector and Bungendore Road that are used by the project. These contributions are to be paid quarterly, are subject to indexation and must be in general accordance with any relevant Section 94 Contributions Plan.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <i>In the event that one of the Council's does not have a relevant Section 94 Contributions Plan, then the adjoining Council's plan should be used instead.</i> <i>Goulburn Mulwaree Council's current applicable contributions plan (at 4 April 2014) is the 'Goulburn Mulwaree Section 94 Development Contributions Plan 2009 Amendment No.2'. This plan</i> 	<ul style="list-style-type: none"> MP 06_0239 MOD 1, 17/06/14 Ramboll internal email, IEA of Woodlawn MBT - Consultation with GMC, 16/03/22 GMC, Veolia Host Fee Calculation / Invoice for the months of November 2019 to February 2022. Veolia, Purchase Order 7100162330, Section 94 Road Contributions, 28/05/19 Veolia, Purchase Order 7100168944, Tarago Road Funding Contribution, 02/07/19 	<p>GMC send monthly Host Fee Calculation invoices to Veolia.</p> <p>When Ramboll consulted GMC regarding the IEA, GMC advised that Veolia are generally timely when paying their contributions to GMC towards: the host fee for the landfill, the Veolia / Mulwaree Trust and haulage route contributions.</p> <p>Veolia Purchase Orders indicate that they have been making payments to Queanbeyan-Palerang Regional Council (QPRC) for Tarago Road Funding Contributions through 2019 to 2021.</p>	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p><i>is subject to indexation each year and is available on Council's website.</i></p> <ul style="list-style-type: none"> <i>Contributions which are directly associated with the local road network shall be separate (in addition to) any royalties Veolia Trust contributes to local community projects.</i> 	<ul style="list-style-type: none"> Veolia, Purchase Order 7100212901, Tarago Road Funding Contribution, 25/02/20 Veolia, Purchase Order 7100235375, Tarago Road Funding Contribution, 26/06/20 Veolia, Purchase Order 7100291754, Tarago Road Funding Contribution, 30/04/21 			
33	<p>Unless the Planning Secretary approves otherwise (see condition 1 in schedule 3), the Proponent shall ensure that:</p> <p>(a) all heavy vehicles associated with the project use the designated heavy vehicle route between the site and the Crisps Creek Intermodal Terminal;</p> <p>(b) heavy vehicles entering or leaving the site with loads are suitably covered; and</p> <p>(c) heavy vehicles leaving the site are cleaned of materials that may fall on the road before they are allowed to leave the site.</p>	<ul style="list-style-type: none"> Site visit on 24/03/22 Draft WRVCP (Rev 0.2, 02/02/22) Veolia, MBT IEA RFI Documents - Appendix 11_04_2022.pdf 	<p>Heavy vehicle restrictions are provided in the WRVCP. Induction and training requirements are also detailed. When leaving the site During the site visit, heavy vehicles were observed travelling along the designated heavy vehicle route and entering the site with loads suitably covered (i.e. containers).</p> <p>A container truck was observed leaving the Woodlawn Eco-Precinct at around 2 pm that passed the Auditors along Collector Road and then turned right at Bungendore. Veolia provided its PWS record, which indicated it had departed the Woodlawn Bioreactor site (not the MBT) and had delivered non-putrescible waste from ACT Recycling P/L. Therefore, it was following an authorised route. It was also travelling prior to the school bus time.</p> <p>Trucks observed entering and leaving the site had loads that were covered or enclosed in containers. There was no evidence of mud tracking or debris falling on the road from trucks. The trucks travel on sealed roads. Veolia advised that those trucks that transport residual waste from the MBT to the Bioreactor return to the MBT via a truck wheel wash at the exit of the Bioreactor.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
34	<p>The Proponent shall prepare and implement a Transport Code of Conduct for the project to the satisfaction of Planning Secretary. This protocol must:</p> <ul style="list-style-type: none"> (a) be submitted to the Planning Secretary for approval prior to construction; (b) be prepared in consultation with PC and GMC; and (c) describe the measures that would be implemented to: <ul style="list-style-type: none"> • minimise the impacts of the development on the local and regional road network, including traffic noise; and • ensure that no heavy vehicles use the designated heavy vehicle route during school bus operations on the route. 	<ul style="list-style-type: none"> • Veolia, Transport Code of Conduct – WL Bioreactor, 10/11/21 	<p>This was assessed as compliant in the 2019 IEA.</p> <p>Veolia updated the Transport Code of Conduct in 2021. It addresses the requirements of this Condition.</p>	Compliant	
34A (as modified)	<p>The Proponent shall prepare and implement a Waste Receipt and Vehicle Control Plan for the project to the satisfaction of the Planning Secretary. The plan shall:</p> <ul style="list-style-type: none"> • be approved by the Planning Secretary prior to the commencement of operation; • be prepared in consultation with the EPA; • include details of the infrastructure, systems and procedures, that will be implemented to ensure compliance with the requirements of Section 88 of the POEO Act and Clauses 12 and 15 of the Protection of the Environment (Waste) Regulation 2005; 	<ul style="list-style-type: none"> • Draft WRVCP (Rev 0.2, 02/02/22) 	<p>This was assessed as compliant in the 2019 IEA.</p> <p>Veolia are in the process of updating the WRVCP. It addresses the requirements of this Condition and is included as Appendix D2 of the Draft OEMP (Rev 0.2, 02/02/22). It was submitted to the EPA and DPE for review.</p>	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<ul style="list-style-type: none"> include details of all vehicle entry and exit points, including emergency exits; and be incorporated into the Operational Environmental Management Plan for the project. 				
VISUAL AMENITY					
35	The Applicant shall ensure that all external lighting associated with the development: (a) does not create a nuisance to surrounding properties or roadways; and (b) complies with <i>AS 4282(INT) 1995-Control of Obtrusive Effects of Outdoor Lighting</i> .	<ul style="list-style-type: none"> Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer 2019 IEA 	Veolia have advised no additional external lighting has been constructed and utilised at the site since the 2019 IEA. The Auditors are satisfied that the site remains compliant with the visual amenity requirements.	Compliant	
36 (as modified)	The Proponent shall construct all new buildings associated with the project using materials and colours that complement the surrounding landscape.	<ul style="list-style-type: none"> 2019 IEA 	No additional buildings have been constructed on site during this Audit Period.	Not triggered	
37 (as modified)	The Proponent shall prepare and implement a Landscaping Management Plan for the project to the satisfaction of the Planning Secretary. The plan shall: (a) be approved by the Planning Secretary prior to the commencement of construction; (b) detail landscaping and vegetation treatments for the project with particular attention to minimising the visibility of the project from residences and public vantage points including Collector Road; and (c) describe the on-going measures that would be implemented to maintain landscaping and vegetation on the site for the life of the project.	<ul style="list-style-type: none"> 2019 IEA Site visit on 24/03/22 Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer 	<p>A Landscaping Management Plan was prepared as part of the CEMP. The Plan was prepared and approved by DPE prior to the commencement of construction in 2015 and was reviewed the Auditors in the previous audit period.</p> <p>The Auditors observed the landscaped areas during the site visit in accordance with the Landscaped Management Plan including the implementation of weekly site inspection checklists.</p> <p>It should be noted that weeds were observed on biofilter 2 and 3 where active management was being undertaken.</p>	Compliant	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
Schedule 4 – Environmental Management, Reporting and Auditing – Woodlawn Mechanical Biological Treatment Facility					
ENVIRONMENTAL MANAGEMENT PLAN					
1	<p>The Proponent shall prepare and implement an Environmental Management Plan for the project to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA by a suitably qualified and experienced expert;</p> <p>(b) be submitted to the Planning Secretary for approval prior to commencement of operations;</p> <p>(c) describe in detail the management measures that would be implemented to address:</p> <ul style="list-style-type: none"> the relevant matters referred to in Section 4 and Appendix B of the EPA's <i>Environmental Guidelines for Composting & Related Organics Processing Facilities</i>; and the conditions of this approval; <p>(d) include a copy of:</p> <ul style="list-style-type: none"> the management plans and monitoring programs required in Schedule 3 of this approval; a quality assurance program for the design and installation of the leachate management system has been developed in accordance with <i>Australian Standard AS 3905.2</i>; <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation 	<ul style="list-style-type: none"> 2019 IEA 2017 OEMP EPA letter to Veolia, Woodlawn Landfill – EPL 20476 – Licence Variation Notice 1614231- DRAFT for comment, 14/12/21 EPA, Notice of Variation of Licence No. 20476, 20/12/21 Draft OEMP (Rev 0.2, 02/02/22) Interviews with facility personnel on 24/03/22 and 28/03/22 Site visit on 24/03/22 Veolia letter to DPE, Woodlawn Alternative Waste Technology Project (MP 06_0239) Food and Garden Organics process improvement and revised Environmental Management Plan, 14/03/22 DPE email to Veolia, Woodlawn MBT Facility - Revised OEMP for Woodlawn MBT - More 	<p>The 2017 OEMP was the approved OEMP during the Audit Period and was available on the project website.</p> <p>However, the OEMP was in the process of being revised in 2021 through to 2022. The first Draft OEMP (Rev 0.1, 15/07/21) was submitted to the EPA on 09/11/21 with an application to vary EPL 20476 for the facility to receive food waste. Hence, the OEMP has been revised in consultation with the EPA, although based on the EPA's response (14/12/21) the EPA were of the view that <i>"that draft changes to the Management Plans submitted as part of this licence variation were for reference only. Any updates to the Managements Plans must be submitted and approved by the Director General"</i>.</p> <p>The Draft OEMP (Rev 0.2, 02/02/22) was submitted to DPE on 14/03/22 and on 21/03/22, DPE requested Veolia to <i>"provide additional information before accepting the document"</i>. The requested additional information appeared relatively insignificant (e.g. formatting issues and changing references to DPIE to DPE).</p> <p>The Draft OEMP (Rev 0.2, 02/02/22) does not include a quality assurance program for the design and installation of the leachate management system [that] has been developed in accordance with <i>AS/NZS 3905.2 Quality system guidelines Part 2: Guide to AS/NZS ISO 9001, AS/NZS ISO 9002, and AS/NZS ISO 9003 for construction</i>. However, the Auditors observe that the 2017 OEMP included the 2017 SWLMP as Appendix D1.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p>and environmental performance of the project;</p> <ul style="list-style-type: none"> • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; and • respond to emergencies; and <p>(f) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project.</p>	Information Required, 21/03/22	<p>The 2017 SWLMP's Appendix D1.3 Verification of Compliance – Leachate Management' contains documentation verifying compliance of the leachate barrier system, including the leachate barrier for the Compost Storage Area (i.e. Maturation Pad) and the Leachate Storage Pond Liner (i.e. Leachate Aeration Pond or Western Leachate Pond). The documentation does not state compliance with AS 3905.2 but instead refers to EPA requirements, specifically <i>Environmental Guidelines for Composting and Related Organics Processing Facilities</i>. The Auditors consider this appropriate and on this basis, consider this aspect compliant. Refer to the findings and recommendations for Schedule 3, Conditions 16, 18 and 21 for further discussion of the SWLMP and managing and maintaining the leachate barrier system.</p> <p>The OEMP describes roles and responsibilities for the majority of key personnel. However, roles and responsibilities are not described for the WMBT Process Engineer, WMBT Operations Supervisor and WMBT Maintenance Supervisor, who also have key roles in monitoring, operating and maintaining the WMBT Facility. It is observed, for example, the WMBT Process Engineer undertakes surface water monitoring and monitors many of the operational parameters including freeboard in the Leachate Aeration Pond (LAP). It is also observed that authorities and accountabilities of key personnel are not clearly described. For example, who has the authority to notify environmental incidents or sign Annual Returns.</p> <p>Overall, the Auditors consider the approved 2017 OEMP has been implemented effectively and this condition is considered generally compliant. However, a number of</p>		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			<p>issues have been identified that are discussed in relation to individual Schedule 3 management plans and programs, specifically, the SWLMP and the Air Quality Monitoring Program.</p> <p>The Auditors recommend as an OFI that the draft OEMP be reviewed and revised to incorporate the findings of this Audit as they relate to the OEMP and associate management plans and programs.</p>		
REPORTING					
2	Prior to carrying out any development on site, and then operations, the Proponent shall certify in writing to the Planning Secretary that it has complied with all the relevant conditions of this approval.	<ul style="list-style-type: none"> 2019 IEA 	Assessed as compliant in the prior audit period. Not applicable for this Audit Period.	Not triggered	
3	Within 24 hours of detecting an exceedance of the limits/performance criteria in this approval, or the occurrence of an incident that causes (or may cause) harm to the environment, the Proponent shall notify the Department and EPA of the exceedance/incident.	<ul style="list-style-type: none"> Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer Email from EPA to Veolia dated 14/12/21, Request for a R3 Report for potential breach of EPL 20476 Licence Condition Letter from DPE, Woodlawn Mechanical Biological Treatment Facility (MP 06_0239) Incident notification – western leachate pond 0.5m freeboard limit exceedance and transfer of leachate, 10 	<p>Veolia advised that EPA personnel were onsite the same day as the freeboard limit of the leachate pond was exceeded and required Veolia to self report to the EPA. Veolia advised they were not required to notify via telephoning the Environment Line service on the day as the EPA were already onsite. No issues have subsequently been raised by the EPA regarding initial notification.</p> <p>A letter issued by DPE refers to Veolia issuing the initial incident notification on 10/12/21 which is within 24 hours of the incident occurring.</p> <p>The Auditors consider this condition is compliant in accordance with this consent.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		December 2021 dated 18/03/22			
4	<p>Within 6 days of notifying the Department and EPA, the Proponent shall provide a written report to the Department and EPA that:</p> <p>(a) describes the date, time, and nature of the incident;</p> <p>(b) identifies the cause, or likely cause, of the incident; and</p> <p>(c) describes what action has been taken to date address the incident, and what actions are proposed to be implemented in the future to either address the consequences of the incident or avoid a recurrence of the incident.</p>	<ul style="list-style-type: none"> Letter from Veolia, Western Leachate Pond Capacity – Woodlawn Mechanical Biological Treatment Facility – Environmental Protection Licence No.29476 dated 12/01/22 	<p>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.</p> <p>The Auditors recommend that Veolia should 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>	Non-compliant	NC4
5	<p>Every year from the date of this approval, unless the Planning Secretary agrees otherwise, the Proponent shall submit an AEMR to the Planning Secretary and relevant agencies. The AEMR shall:</p> <p>(a) identify the standards and performance measures that apply to the development;</p> <p>(b) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years;</p> <p>(c) include a summary of the monitoring results for the development during the past year;</p> <p>(d) include an analysis of these monitoring results against the relevant:</p> <ul style="list-style-type: none"> impact assessment criteria; monitoring results from previous years; and 	<ul style="list-style-type: none"> AEMRs dated: December 2019 December 2020 December 2021 	<p>AEMRs have been prepared for each year since the previous audit period. The AEMRs are structured and presented to address each of the conditions (a) – (g).</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<ul style="list-style-type: none"> predictions in the EIS; (e) identify any trends in the monitoring results over the life of the development; (f) identify any non-compliance during the previous year; and (g) describe what actions were or are being taken to ensure compliance. 				
INDEPENDENT ENVIRONMENTAL AUDIT					
6	<p>Within 2 years of the commencement of operations, and every 3 years thereafter, unless the Planning Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:</p> <p>(a) be carried out by a suitably qualified, experienced and independent audit team containing a waste management specialist, whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) include consultation with EPA;</p> <p>(c) assess the environmental performance of the project, and its effects on the surrounding environment;</p> <p>(d) determine whether the project is complying with the relevant standards, performance measures and statutory requirements;</p> <p>(e) review the adequacy of the Environmental Management Plan for the project, compliance with the requirements of this approval, and any other licences and approvals; and, if necessary,</p>	<ul style="list-style-type: none"> Letter from DPE to Veolia dated 24/02/22, Woodlawn Mechanical Biological Treatment Facility (MP 06_0239) Independent Auditor 2022 Letter from NSW EPA to Ramboll dated 18/03/22, Woodlawn Landfill – IEA – Woodlawn MBT Facility (MP 06_0239) and EPL 20476) 2019 IEA Consultation with the EPA representative 	<p>The Independent Environmental Audit which is the subject of this report was commissioned within three years after the 1st IEA in 2019. The IEA was commissioned by 24/02/22, being the date the audit team was endorsed by DPE i.e. three years following when the first IEA was commissioned.</p> <p>This Audit has been conducted generally in accordance with the requirements of this Condition.</p> <p>The Auditors consulted the EPA.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	(f) recommend measures or actions to improve the environmental performance of the project, and/or any plan/program required under this approval.				
7	Within 3 months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Proponent shall submit a copy of the audit report to the Planning Secretary, with a response to any recommendations contained in the audit report.	<ul style="list-style-type: none"> 2019 IEA Letter from DPE to Veolia, Woodlawn Mechanical Biological Treatment Facility (MP 06_0239) Independent Auditor 2022 dated 24/02/22 Letter from Veolia to DPE, Re: Independent Environmental Audit (IEA) Report 2019 – Woodlawn Mechanical Biological Treatment (MBT) Facility – MP 06_0239, 21/05/19 	<p>For the previous audit, Veolia submitted the audit and a response to DPE on 21/05/19 within 3 months of the audit being commissioned on 28/02/19.</p> <p>For the current audit, DPE provided endorsement for the audit team on 24/02/22. The audit report including Veolia's response needs to be submitted to DPE by 24/05/22 within 3 months.</p>	Compliant	
8	Within 3 months of submitting a copy of the audit report to the Planning Secretary, the Proponent shall review and if necessary revise the plans/programs required under this approval to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> Letter from Veolia, Re: Independent Environmental Audit (IEA) Report 2019 – Woodlawn Mechanical Biological Treatment (MBT) Facility – MP 06_0239, 21/05/19 Veolia, MBT IEA 2019 Recommendations Actions Tracker.pdf, not dated 	<p>Following the submission of the 1st IEA in 2019, Veolia reviewed plans and submitted a letter to DPE within 3 months of submitting the 2019 IEA. No correspondence from DPE was reviewed by the Auditors</p> <p>Veolia provided a record (undated) showing that all of the actions arising from the 2019 IEA had been completed. Whilst one action related to EPL 20476, Condition M5.2, involved updating the Eco Precinct Complaint Handling Procedure, Complaint Reporting form and Register, none of the actions required revising a management plan or program. On this basis, the Auditors consider revisions were not necessary. The Auditors understand that the OEMP and its sub-plans and programs were not revised until 2021.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
ACCESS TO INFORMATION					
9	<p>Within 1 month of the approval of any plan or program required under this consent, or the completion of any independent audit or AEMR required under this approval, the Proponent shall:</p> <p>(a) ensure that a copy of the relevant documents is made publicly available on the Proponent's website; and</p> <p>(b) provide a copy of the relevant document/s to any interested party upon request.</p>	<ul style="list-style-type: none"> Veolia website (https://www.veolia.com/anz/WoodlawnEcoPreinct) 	Information required to be made publicly available were observed on the Veolia website.	Compliant	
Schedule 5 Specific Environmental Conditions – Solid Recovered Fuel Processing Area					
TRAFFIC AND ACCESS					
1 (as modified)	<p>The Proponent must ensure:</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 Solid Recovered Fuel (SRF) Processing Area are constructed and maintained in accordance with the latest version of AS 2890 .1 :2004 Parking facilities Off-street car parking (Standards Australia, 2004) and AS2890.2:2002 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2002);</p> <p>(b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines;</p>			Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	(c) the SRF Processing Area does not result in any vehicles queuing on the public road network; (d) heavy vehicles associated with the SRF Processing Area are not parked on local roads or footpaths in the vicinity of the site; (e) all vehicles are wholly contained on site before being required to stop; (f) all loading and unloading of materials is carried out on-site; (g) all trucks entering or leaving the site with loads have their load covered and do not track dirt onto the public road network; and (h) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.				
SOILS, WATER AND HYDROLOGY					
2 (as modified)	The Proponent must: (a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Department upon request.			Not triggered	
3 (as modified)	Prior to the commencement of any construction or other surface disturbance associated with the SRF Processing Area, the Proponent must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004)			Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition 30 of Schedule 4.				
4 (as modified)	The SRF Processing Area must comply with section 120 of the POEO Act, which prohibits the pollution of waters; except as expressly provided for in an EPL.			Not triggered	
5 (as modified)	<p>Prior to the commencement of construction, the Proponent must design a stormwater management system for the SRF Processing Area. The system must:</p> <p>(a) be designed by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) be generally in accordance with the conceptual design in the EA and RTS for MP 06_0239 MOD 2;</p> <p>(c) be in accordance with applicable Australian Standards;</p> <p>(d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Manging Urban Stormwater: Council Handbook (EPA, 1997) guidelines;</p> <p>(e) divert existing clean surface water around operational areas of the SRF Processing Area.</p>			Not triggered	
AIR QUALITY					
6 (as modified)	The Proponent must take all reasonable steps to minimise dust generated during all works authorised by this consent.			Not triggered	
7 (as modified)	During construction, the Proponent must ensure that:			Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	(a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the SRF Processing Area do not track dirt onto the public road network; and (d) land stabilisation works are carried out progressively on-site to minimise exposed surfaces.				
8 (as modified)	Trucks transporting waste to and from the SRF Processing Area must be covered at all times, except for when they are loading or unloading.			Not triggered	
9 (as modified)	The SRF Processing Area is limited to process 50,000 tonnes per annum of residual waste from the MBT facility.			Not triggered	
10 (as modified)	The SRF Processing Area must be designed and constructed so as not to preclude the retrofit of odour controls to the processing building and dryer exhaust.			Not triggered	
11 (as modified)	The Proponent must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.			Not triggered	
12 (as modified)	Prior to the commencement of operation, the Proponent must prepare an Air Quality Management Plan (AQMP) for the SRF Processing Area to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition 5 of Schedule 6. The AQMP must:			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	(a) be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary; (b) detail and rank all emissions from all sources of the development, including particulate emissions; (c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators; (d) identify the control measures that will be implemented for each emission source; and (e) nominate the following for each of the proposed controls: (i) key performance indicator; (ii) monitoring method; (iii) location, frequency and duration of monitoring; (iv) record keeping; (v) complaints register; (vi) response procedures; and (vii) compliance monitoring.				
13 (as modified)	The Proponent must: (a) not commence operation until the Air Quality Management Plan required by Condition 12 is approved by the Planning Secretary; and (b) implement the most recent version of the Air Quality Management Plan approved by the Planning Secretary for the duration of development of the SRF Processing Area.			Not triggered	
14 (as modified)	The Proponent must carry out an Air Quality and Odour Audit of the SRF Processing Area			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	within 3 months of the commencement of operation. The audit must: (a) be carried out by a suitably qualified and experienced expert; (b) validate the emissions from the SRF Processing Area against air quality and odour emissions predictions made in the modification application; (c) should the Proponent install dryer exhaust(s), assess particulate matter emissions from the dryer exhaust against limits set out in the Protection of the Environment Operations (Clean Air) Regulation 2010; (d) review design and management practices of the SRF Processing Area against industry best practice for air emissions and odour management; and (e) assess the need for any additional mitigation measures based on the findings of the audit and provide recommendations for their implementation.				
15 (as modified)	Within 6 weeks of the completion of an Air Quality and Odour Audit, the Proponent shall submit a copy of the audit report to both the EPA and the Department with a response to any recommendations contained in the audit report.			Not triggered	
16 (as modified)	The Proponent must ensure that SRF Processing Area does not cause or permit the emission of any offensive odour (as defined in the POEO Act).			Not triggered	
17 (as modified)	The Proponent must ensure that all SRF product is stored in a manner that maintains it in a dry state. If stored outside			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	the processing building, storage must prevent water ingress.				
18 (as modified)	SRF product must not be used as fuel on the premises.			Not triggered	
NOISE					
19 (as modified)	The Proponent must comply with the hours detailed in Table 6, unless otherwise agreed in writing by the Planning Secretary.			Not triggered	
20 (as modified)	Works outside of the hours identified in Condition 19 may be undertaken in the following circumstances: (a) works that are inaudible at the nearest sensitive receivers; (b) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (c) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.			Not triggered	
21 (as modified)	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Guideline (DECC, 2009) (as may be updated or replaced from time to time). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in the Appendix 6.			Not triggered	
22 (as modified)	Prior to the commencement of construction, the Proponent must prepare a Driver Code of Conduct and induction training for the			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	development to minimise road traffic noise. The Proponent must update the Driver Code of Conduct and induction training for construction and operation and must implement the Code of Conduct for the life of the SRF Processing Area.				
FIRE MANAGEMENT					
23 (as modified)	Prior to the commencement of construction, the final design of the development must be finalised in consultation with and to the satisfaction of Fire and Rescue (FRNSW) and include suitable provisions for special hazards by specifically addressing Clauses E1 .10 and E2.3 of Volume One of the National Construction Code (NCC) Series.			Not triggered	
WASTE MANAGEMENT					
24 (as modified)	From the commencement of operation, the Proponent must implement a Waste Monitoring Program for the SRF Processing Area. The program must: (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; (b) include suitable provision to monitor the: (i) quantity, type and source of waste received on site; and (ii) quantity, type and quality of the outputs produced on site; and (c) ensure that: (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	(ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.				
ENVIRONMENTAL MANAGEMENT					
25 (as modified)	Prior to the commencement of construction of the SRF Processing Area, the Proponent must prepare a Waste Receipt and Vehicle Flow Control Plan in consultation with the EPA to the satisfaction of the Planning Secretary and the EPA. The Plan must show all vehicle entry and exit points, including emergency exists, where waste is transported into, out of, and between (a) the SRF Processing Area and (b) the adjoining Woodlawn Mechanical Biological Treatment facility and (c) the Woodlawn Bioreactor.			Not triggered	
26 (as modified)	The Proponent must prepare a Construction Environmental Management Plan (CEMP) for the SRF Processing Area in accordance with the requirements of Condition 1 of Schedule 6 and to the satisfaction of the Planning Secretary.			Not triggered	
27 (as modified)	As part of the CEMP required under Condition 26 of Schedule 4 of this approval, the Proponent must include the following: (i) Erosion and Sediment Control Plan; and (ii) Community Consultation and Complaints Handling.			Not triggered	
28 (as modified)	The Proponent must: (a) not commence construction of the SRF Processing Area until the CEMP is approved by the Planning Secretary; and			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	(b) carry out the construction of the SRF Processing Area in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary.				

Schedule 6 Environmental Management, Reporting and Auditing – Site Wide**ENVIRONMENTAL MANAGEMENT**

1 (as modified)	<p>Management plans required under this approval must be prepared in accordance with relevant guidelines, and include:</p> <p>(a) detailed baseline data where applicable;</p> <p>(b) details of:</p> <ul style="list-style-type: none"> the relevant statutory requirements (including any relevant approval, licence or lease conditions); any relevant limits or performance measures and criteria; and 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; <p>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p> <p>(d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> impacts and environmental performance of the development; and effectiveness of the management measures set out pursuant to paragraph (c) above; <p>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce</p>			Not triggered	
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Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p>to levels below relevant impact assessment criteria as quickly as possible;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> • incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); • complaint; • failure to comply with statutory requirements; and <p>(g) a protocol for periodic review of the plan.</p> <p><i>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i></p>				
2 (as modified)	<p>Within three months of:</p> <p>(a) the submission of a Compliance Report under Condition 13 of Schedule 6;</p> <p>(b) the submission of an incident report under Condition 8 of Schedule 6;</p> <p>(c) the submission of an Independent Audit under Condition 16 of Schedule 6;</p> <p>(d) the approval of any modification of the conditions of this approval; or</p> <p>(e) the issue of a direction of the Planning Secretary under Condition 2(b) of Schedule 2 which requires a review.</p>			Not triggered	
3 (as modified)	The strategies, plans and programs required under this approval must be reviewed, and			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	the Department must be notified in writing that a review is being carried out.				
4 (as modified)	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this approval must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.</p> <p><i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i></p>			Not triggered	
5 (as modified)	The Proponent must prepare an Operational Environmental Management Plan (OEMP) for the site in accordance with the requirements of Condition 1 of Schedule 6 and to the satisfaction of the Planning Secretary.			Not triggered	
6 (as modified)	<p>As part of the OEMP required under Condition 5 of Schedule 6 of this approval, the Proponent must include the following:</p> <p>(a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the site;</p> <p>(b) describe the procedures that would be implemented to:</p> <p>(i) keep the local community and relevant agencies informed about the operation and</p>			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p>environmental performance of the development;</p> <p>(ii) receive, handle, respond to, and record complaints;</p> <p>(iii) resolve any disputes that may arise;</p> <p>(iv) respond to any non-compliance;</p> <p>(v) respond to emergencies; and</p> <p>(c) incorporate the content of the Environmental Management Plans for the MBT Facility and the SRF Processing Area including:</p> <p>(i) Rehabilitation and Closure Plan (RCP) for Woodlawn Mechanical Biological Treatment Facility (see Condition 13 of Schedule 3);</p> <p>(ii) Soil, Water and Leachate Management Plan (SWLMP) for Woodlawn Mechanical Biological Treatment Facility (see Condition 16 of Schedule 3);</p> <p>(iii) Environmental Management Plan for Woodlawn Mechanical Biological Treatment Facility (see Condition 1 of Schedule 4); and</p> <p>(iv) Air Quality Management Plan (AQMP) for Solid Recovered Fuel Processing Area (see Condition 15 of Schedule 5);</p> <p>(v) Operational Traffic Management Plan (OTMP) for Solid Recovered Fuel Processing Area; and</p> <p>(d) Operational Waste Management Plan for the site.</p>				
7 (as modified)	The Proponent must operate the site in accordance with the OEMP approved by the Planning Secretary.			Not triggered	
REPORTING AND AUDITING					
8 (as modified)	The Department must be notified in writing to compliance@plannlnq.nsw.gov.au			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.				
9 (as modified)	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.			Not triggered	
10 (as modified)	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.			Not triggered	
11 (as modified)	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.			Not triggered	
12 (as modified)	No later than 6 weeks before the date notified for the commencement of operation, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department.			Not triggered	
13 (as modified)	Compliance Reports of the project must be carried out in accordance with the			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	Compliance Reporting Post Approval Requirements (Department 2018).				
14 (as modified)	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Department and notify the Department in writing at least 7 days before this is done.			Not triggered	
15 (as modified)	No later than 4 weeks before the date notified for the commencement of operation, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department.			Not triggered	
16 (as modified)	Independent Audits of the development must be carried out in accordance with: (a) the Independent Audit Program submitted to the Department under Condition 15 of this approval; and (b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).			Not triggered	
17 (as modified)	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: (a) review and respond to each Independent Audit Report prepared under Condition 16 of this approval; (b) submit the response to the Department; and (c) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	Department and notify the Department in writing at least 7 days before this is done.				
18 (as modified)	<p>Any condition of this approval that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.</p> <p><i>Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the approval or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the approval or the environmental management or impact of the development.</i></p>			Not triggered	
ACCESS TO INFORMATION					
19 (as modified)	<p>At least 48 hours before the commencement of construction until the completion of all works under this approval, including rehabilitation and remediation, the Applicant must:</p> <p>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <ul style="list-style-type: none"> the documents referred to in Condition 2 of Schedule 2 of this approval; 			Not triggered	

Table A-1: Compliance with Project Approval 06_0239

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<ul style="list-style-type: none"> • all current statutory approvals for the development; • all approved strategies, plans and programs required under the conditions of this approval; • all proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; • regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this approval; • a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs; • a summary of the current stage and progress of the development; • contact details to enquire about the development or to make a complaint; • a complaints register, update monthly; • the Compliance Report of the development; • audit reports prepared as part of any Independent Audit of the development and the Applicant's response to the recommendations in any audit report; • any other matter required by the Planning Secretary; and <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>				

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
1 Administrative Conditions					
<i>A1 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 (refer to Table in Licence).</p>	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 	<p>The site carries out the scheduled activities (Composting, Resource Recovery and Waste storage) generally in accordance with the conditions of Environmental Protection Licence 20476 (EPL 20476).</p> <p>It should be noted that the scale of the activities is not limited by this condition.</p>	Compliant	
<i>A2 Premises of plant to which this licence applies</i>					
A2.1	<p>The licence applies to the following premises:</p> <p>WOODLAWN MECHANICAL BIOLOGICAL TREATMENT FACILITY 619 COLLECTOR ROAD, TARAGO NSW 2580</p> <p>PART LOTS 33 AND 69 DP 754919 AND PART LOT 4 DP 830765 AS SHOWN AS HATCHED AREA ON DRAWING 204543-30 "PLAN SHOWING SITE LAYOUT AND ENVIRONMENTAL MONITORING POINTS", ISSUE B, 17/9/14.</p>	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 LandTeam Australia Pty Ltd, Plan showing site layout and environmental Monitoring Points, Woodlawn MBT Facility, Collector Road, Tarago, Drawing No. 	<p>The premises have not changed since the 2019 IEA.</p>	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		204543-30, Issue F, 20/02/17			
<i>A3 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.	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 EPA, Notice of Variation of Licence No. 20476, 20/12/21 	The Auditors have not reviewed licence applications. However, Veolia applied for a variation to EPL 20476 on 09/11/21 and the Auditors reviewed the EPA's Notice of Variation of Licence No. 20476, which was issued on 20/12/21. The variation was to permit Veolia to process food waste. Veolia have carried out the activities generally in accordance with the licence variation, except as noted in relation to specific conditions.	Compliant	
A3.2	Any other document and/or management plan is not to be taken as part of the documentation in condition A3.1, other than those documents and/or management plans specifically referenced in this licence.	<ul style="list-style-type: none"> EPL 20476 	The only document or management plan referenced in EPL 20476 is the Pollution Incident Response Management Plan.	Compliant	
2 Discharge to Air and Water and Applications to Land					
<i>P1 Location of monitoring/discharge points and areas</i>					
P1.1 (as modified)	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point (refer to Table in Licence).	<ul style="list-style-type: none"> Draft OEMP (Rev 0.2, 02/02/22) LandTeam Australia Pty Ltd, Plan showing site layout and environmental 	<p>The referenced drawings are attached as Appendices D1.5 and D1.6 to the SWLMP, which is Appendix D1 in the OEMP.</p> <p>Monitoring records were available for Air monitoring Points 4, 6 and 7.</p> <p>The Auditors observed the following in relation to the drawings:</p> <ul style="list-style-type: none"> Point 4 at Pylara, is not indicated on either drawing. 	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<p>Monitoring Points, Woodlawn MBT Facility, Collector Road, Tarago, Drawing No. 204543-30, Issue F, 20/02/17</p> <ul style="list-style-type: none"> LandTeam, Woodlawn Environmental Protection Licence Site Monitoring Locations, , Drawing No.: 16800-225, B, 21/04/21 	<ul style="list-style-type: none"> Labelling of EPA Points is inconsistent between drawings. The MBT drawing refers to the points by EPL 20476 Point number. The Woodlawn drawing does not refer to Point numbers at all but instead refers to site labels (e.g. DG34 instead of Point 6). The Woodlawn drawing does not show any of the MBT locations except Point 1 / 115 and Point 6 / DG34, although the latter Point looks to be located incorrectly. <p>The Auditors recommend as an OFI that Point 4 and the other EPA Points be shown 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).</p>		
P1.2 (as modified)	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point (refer to Table in Licence).	<ul style="list-style-type: none"> Same as for Condition P1.1 	Monitoring records were available for water monitoring, discharge monitoring, groundwater monitoring and leachate monitoring at Points 1, 8, 11 and 12, respectively. All four water monitoring points are shown on the referenced drawings.	Compliant	
P1.3	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 (refer to Table in Licence).	<ul style="list-style-type: none"> Same as for Condition P1.1 	<p>Monitoring records were not available for noise monitoring at Points 2 (Torokina) and 3 (Willeroo), as no noise complaints had been received during the Audit Period.</p> <p>Monitoring records were available for Point 10 (Woodlawn Eco Precinct Meteorological Station).</p> <p>The Auditors observed the following in relation to the drawings:</p> <ul style="list-style-type: none"> Point 3 at Willeroo, is not indicated on either drawing. 	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			<ul style="list-style-type: none"> Point 10 is indicated on 'Woodlawn Environmental Protection Licence Site Monitoring Locations' as the 'MET STN' It would be clearer to refer to EPA Points by their Point number so they are readily identified as EPA Points. <p>The Auditors recommend as an OFI that Points 3 and 10 be indicated on a site plan attached to the OEMP. The plan(s) should indicate that they are EPA Points.</p>		
3 Limit Conditions					
<i>L1 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.	<ul style="list-style-type: none"> Annual Return 22-12-2018 to 21-12-2019 (2019 Annual Return) Annual Return 22-12-2019 to 21-12-2020 (2020 Annual Return) Annual Return 22-12-2020 to 21-12-2021 (2021 Annual Return) Veolia, Woodlawn Bioreactor Facility - Surface Water Quality Monitoring - Site 140 (MBT), MBT Surface 	<p>The site maintains separation between leachate generating areas and stormwater with drainage to separate retention dams.</p> <p>Water monitoring is conducted at two surface water locations at the site boundary (Point 8) and downstream in Allionanoyonyiga Creek (Point 1), as well as one groundwater well (Point 12).</p> <p>Based on Veolia's Surface Water Quality Monitoring spreadsheet for Point 8, the 100 percentile concentration limit for Total Suspended Solids (TSS) in Condition L2.4 was exceeded at Discharge Monitoring Point 8 where water discharges from the premises to a waterway / creek. The TSS exceedances were reported in the 2021 Annual Return.</p> <p>The Auditors understand that the EPA did not find Veolia to be non-compliant with Condition L1.1. On this basis the Auditors consider this Condition to be compliant.</p>	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		Water - Site 140 (Point 8).xlsx			
<i>L2 Concentration limits</i>					
L2.1	For each monitoring/discharge point or utilisation area specified in the table\ below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	<ul style="list-style-type: none"> EPL 20476, Condition L2 	Only Point 8 is subject to concentration limits, being for pH and TSS. Refer to the findings and recommendations for Condition L2.4.	Compliant	
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	<ul style="list-style-type: none"> EPL 20476, Condition L2 	The pH limit for Point 8 is a 100 percentile concentration limit. Therefore, 100% percentage of samples must be within the specified pH range.	Compliant	
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\.	<ul style="list-style-type: none"> EPL 20476, Condition L2 	No evidence of pollution by pollutants other than pH and TSS have been observed.	Compliant	
L2.4	Water and/or Land Concentration Limits (refer to Table in Licence).	<ul style="list-style-type: none"> Annual Return 2019 Annual Return 2020 Annual Return 2021 Veolia, Woodlawn Bioreactor Facility - Surface Water Quality Monitoring - Site 140 (MBT) , MBT Surface Water - Site 140 (Point 8).xlsx 	Section C2 of the 2021 Annual Return indicated that Conditions L2.1 and L2.4 were not complied with. Section B indicated that 7 samples were collected and analysed ranging from 17 mg/L TSS to 134 mg/L TSS. Section C2 indicated three results exceeded the 100 % concentration of 50 mg/L on 23/03/21, 30/09/21 and 11/10/21. However, Veolia's Surface Water Quality Monitoring spreadsheet for Point 8 indicates that up to 11 samples were collected between 23/03/21 and 13/12/21 with five exceedances. The TSS limit was also exceeded on 10/12/21 (255 mg/L) when the freeboard limit was exceeded following heavy rainfall and on 13/12/21 (167 mg/L). Veolia advised that four samples collected on 02/12/21, 10/12/21, 11/12/21 and 13/12/21 were collected for internal purposes. Given that the samples appear to be the only samples collected on each of the four days, there was discharge occurring on at least one of those days (10/12/21) and Condition M2.3 requires sampling at Point 8 daily during any discharge, the Auditors consider the	Non-compliant	NC5

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			<p>results should be treated as monitoring results for the EPL unless further justification were to be provided. Refer to the Findings and Recommendations for Condition R1.7.</p> <p>Based on Veolia's Surface Water Quality Monitoring spreadsheet, the 100 percentile concentration range limit for pH may have been exceeded on at least one occasion. On 08/11/21, the sample was not tested for pH by probe in the field but the laboratory analysis result for the Grab sample was 8.54, which exceeded the 100 percentile concentration upper limit of 8.5. Refer to the Findings and Recommendations for Condition M2.3 regarding the sample method. Also refer to the Findings and Recommendations for Condition M3.2 in relation to the reporting methodology.</p> <p>Condition L2.4 is non-compliant due to exceedances of the 100 percentile concentration limit for TSS, and possibly pH on at least one occasion.</p> <p>According to the 2021 Annual Return, the TSS exceedances were due to heavy rainfall events and incorrect sampling technique was used on one occasion. Veolia undertook corrective actions including deployment of additional sediment and erosion controls in the form of straw hay bales and hessian fabrics. Water drainages were modified to control the water flow and minimise erosion. The sampling procedure was also amended to ensure no disturbance of sediment at the sample location.</p> <p>The Auditors have made a recommendation to improve erosion and sediment controls to reduce turbidity and prevent TSS exceedances in Table A-1, Schedule 3, Condition 16.</p> <p>The Auditors recommend in conjunction with Recommendations for Conditions M2.3 and R1.7, that</p>		

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			Veolia review the Point 8 monitoring results to confirm the number of TSS and possible pH exceedances. Depending on the outcome of the review, notification of additional TSS and/or pH concentration limit exceedances may be required relative to the exceedances reported in the 2021 Annual Return.		
<i>L3 Waste</i>					
L3.1 (as modified)	<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 "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence (refer to Table in Licence).</p>	<ul style="list-style-type: none"> Site inspection Waste Receipt and Control Plan, Woodlawn Mechanical Biological Treatment Facility, Veolia, 02/02/22 MBT Waste Tracking Records 22/03/19 – 24/03/22 	<p>Based on incoming waste records since the start of Audit Period, receipt of waste has only been via Crisps Creek Intermodal Terminal which receives waste from Clyde Waste Transfer Station and Banksmeadow Transfer Terminal. According to waste inventory incoming records:</p> <ul style="list-style-type: none"> The following mixed waste has been received to site <ul style="list-style-type: none"> 22/03/19 – 31/12/19 – 97,520 tonnes 01/01/20 – 31/12/20 – 124,518 tonnes 01/01/21 – 31/12/21 – 143,793 tonnes 03/01/22 – 24/03/22 – 27,830 tonnes The following food and garden waste has been received to site <ul style="list-style-type: none"> 28/02/22 – 21/03/22 – 174 tonnes 	Compliant	
L3.2	The authorised amount of waste permitted on the premises cannot exceed 30,000 tonnes at any one time.	<ul style="list-style-type: none"> Letter from LandTeam to Veolia, Re: Volume Survey at Veolia MBT Facility, 19 July 2019; 19 December 2019; 03 July 2020; 17 December 	<p>The Auditors observed that it is difficult to assess the amount of waste on the premises at any one time using the PWS records.</p> <p>Veolia periodically carries out a volumetric survey of the waste and compost stockpile materials at the site including the compost maturation pad and organic buffer storage. The Auditors have reviewed 7 surveys carried out during this Audit Period in which the maximum surveyed volume was 32,486 m³. and were advised by Veolia that estimated volumes were calculated using densities resulting in volumes less than the</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		2020; 21 January 2021; 30 June 2021; 14 October 2021 <ul style="list-style-type: none"> Interview with Facility Manager, Operations Supervisor, Process Engineer and Woodlawn Precinct Environmental Officer 	EPL limit of 30,000 tonnes. The Auditors have not been provided the densities used. The Auditors recommend a review of 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.		
L3.3 (as modified)	The premises must not receive more than 20,000 tonnes of food waste per licence year.	<ul style="list-style-type: none"> Interview with Facility Manager, Operations Supervisor, Process Engineer and Woodlawn Precinct Environmental Officer MBT Waste Tracking Records 22/03/19 – 24/03/22 	Veolia have advised that they have only started to receive food waste since February 2022. The Auditors have reviewed the waste records. To date 174 tonnes of food waste has been received at the site in accordance with the condition of this consent.	Compliant	

L4 Noise limits

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
L4.1	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 (refer to Table in Licence).	<ul style="list-style-type: none"> Draft OEMP (Rev 0.2, 02/02/22) Site visit on 24/03/22 Interviews on 24/03/22 and 28/03/22 Veolia, Environment Monitoring Program for Woodlawn Mechanical Biological Treatment Facility, 19/01/17 2019 IEA 	<p>Condition L4.1 does not specify a Measurement Frequency for noise monitoring.</p> <p>The Environment Monitoring Program indicates that noise monitoring is conducted "as required". Veolia advised that no noise complaints were received during the Audit Period and therefore, no noise monitoring was conducted.</p> <p>The Auditors observe that the L4.1 noise limit level (40 dB(A)) is different to the Project Approval 06_0239 noise limit for operation (35 dB(A)). The Draft OEMP (Rev 0.2, 02/02/22) references the lower limit.</p> <p>The Auditors recommend as an OFI that the Draft OEMP (Rev 0.2, 02/02/22) be amended to include the Condition L4.1 noise limit for clarity.</p>	Compliant	
<i>L5 Hours of operation</i>					
L5.1	<p>All operational activities at the premises may only be conducted between the hours of 6am and 10pm Monday to Saturday.</p> <p><i>Note: This condition does not apply to emergency situations where works are required to avoid the loss or life or property or to prevent environmental harm.</i></p> <p><i>Note: Operation of BRS drums and associated infrastructure is permitted to occur over 24 hours.</i></p>	<ul style="list-style-type: none"> Draft OEMP (Rev 0.2, 02/02/22) Site visit on 24/03/22 Interviews on 24/03/22 and 28/03/22 PWS Report full day (02-Mar-2022) (1).xlsx week52 02-01-2022-165840.pdf 	<p>Veolia advised that the facility's operating hours comply with this condition. No evidence suggests otherwise.</p> <p>A sample PWS record indicates waste was received after 6am.</p>	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
<i>L6 Potentially offensive odour</i>					
L6.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	<ul style="list-style-type: none"> • Site Inspection • AEMRs dated: <ul style="list-style-type: none"> • December 2019 • December 2020 • December 2021 • Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer • Eco-Precinct Complaints Register 2019 – 2022 • Woodlawn Bioreactor Expansion Project IOA #7, #8 and #9 • Woodlawn Eco-Precinct IOA 2021 Recommendation Responses • Consultation with the EPA representative 	<p>Although offensive odours were observed during the site inspection within the premises; specifically, outside of the reception building, organic buffer storage and fermentation building when doors were open, and around the maturation pad; the Auditors did not observe offensive odours in Tarago or Collector Road. One of the doors to the Reception Building did not appear to fully close on departure of the trucks.</p> <p>No odour complaints are recorded on the complaints register in relation to the Woodlawn MBT. Odour complaints have been received for the Bioreactor and have increased from 32 in 2019, 20 in 2020 to 302 in 2021. Veolia have advised that not all odour complaints have had the source fully investigated.</p> <p>The Auditors have reviewed the Independent Odour Audits (IOA) conducted in 2019, 2020 and 2021 by The Odour Unit Pty Ltd for the Woodlawn Waste Expansion Project and observed the Odour Unit currently undertaking their 2022 audit at the site. Following the 2021 IOA, it was recommended for increased overall management of the biofilters. The Auditors observed and discussed the Veolia Asset Maintenance (VAM) system and the biofilters onsite as well as monthly inspection records. The Auditors consider continued maintenance by Veolia is ongoing. It should be noted that the Auditors observed overgrown weeds on biofilter 2 and 3 during the site visit which Veolia have advised are being controlled by pesticides.</p> <p>Based on the available evidence, the Auditors consider that the odours emitted by the Woodlawn MBT are actively being managed.</p> <p>The Auditors note that the EPA have flagged the requirement for management of the biofilters are in accordance with management plans and manuals.</p>	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> Work Order Monthly Inspections – Bio Filters 1 & 2, Veolia, 20/03/22 	The Auditors recommend as an OFI that continued management of the biofilters should be undertaken in addition to a review of building enclosures onsite to ensure odours are effectively being managed onsite.		
4 Operating Conditions					
<i>O1 Activities must be carried out in a competent manner</i>					
O1.1	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	<ul style="list-style-type: none"> Site inspection Employee Training Records Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer Waste Receipt and Control Plan, Woodlawn Mechanical Biological Treatment Facility, Veolia, 02/02/22 WL-MBT Operation in Reception & Pre-treatment Procedure, 	Based on the site inspection and interviews of personnel, the site and its facilities appeared to be managed in a competent manner. Personnel interviewed were knowledgeable about their roles and responsibilities. Internal procedures and screening of foreign or reject materials were observed and reviewed as well as employee training certificates. It is understood staff undertake JSEAs prior to each work activity and are trained annually, or when required.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		Veolia 14/05/19 <ul style="list-style-type: none"> WL – MBT Removal of Non Confirming Waste Received in Reception Pit, Veolia 02/03/21 Copies of training certificates for 'operating a gantry or overhead crane' 			
<i>O2 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.	<ul style="list-style-type: none"> Site inspection Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer Samples of completed pre- start checks for fixed and mobile plant and equipment 	Veolia has a preventative maintenance system, VAMS. All assets including plant and equipment are registered in VAMS and the system issues maintenance and service work orders. During the site interview, Veolia provided access to VAMS and showed the Auditors how plant and equipment is maintained through the system. A selection of pre-start checks, daily checklists and training certificates were also provided and reviewed by the Auditors.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> Copies of training certificates for 'operating a gantry or overhead crane' 			
<i>O3 Dust</i>					
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<ul style="list-style-type: none"> Draft OEMP (Rev 0.2, 02/02/22) Site visit on 24/03/22 Interviews on 24/03/22 and 28/03/22 	<p>The roads to access the Woodlawn MBT are paved, thus minimising dust from truck movements. Dust management measures are detailed in the Draft OEMP (Rev 0.2, 02/02/22). Dust was not observed to be an issue during the site visit as it had been raining.</p> <p>Elevated deposited dust levels have been measured at Point 4 (DG28, Pylara) and Point 6 (DG34, West Void), which are beyond the premises of the MBT, during the Audit Period. However, it is considered likely that these measurements are more representative of emissions from the Eco Precinct and the Woodlawn Bioreactor, as opposed to the MBT. Overall, this condition is considered compliant.</p>	Compliant	
O3.2	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	<ul style="list-style-type: none"> Draft OEMP (Rev 0.2, 02/02/22) Site visit on 24/03/22 Interviews on 24/03/22 and 28/03/22 	<p>The roads to access the Woodlawn MBT are paved, thus minimising dust from truck movements. Dust management measures are detailed in the Draft OEMP (Rev 0.2, 02/02/22). Dust was not observed to be an issue during the site visit as it had been raining. Overall, this condition is considered compliant.</p>	Compliant	
O3.3	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	<ul style="list-style-type: none"> Draft OEMP (Rev 0.2, 02/02/22) Site visit on 24/03/22 	All of the trucks observed during the site visit were either carrying enclosed containers or the load was covered.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> Interviews on 24/03/22 and 28/03/22 Draft WRVCP (Rev 0.2, 02/02/22) 			
<i>O4 Processes and management</i>					
O4.1	The licensee must take all practicable measures to minimise the tracking of mud, waste and other materials by vehicles leaving the premises.	<ul style="list-style-type: none"> Draft OEMP (Rev 0.2, 02/02/22) Site visit on 24/03/22 Interviews on 24/03/22 and 28/03/22 Draft WRVCP (Rev 0.2, 02/02/22) 	There was no evidence of mud tracking or debris falling on the road from trucks. The trucks travel on sealed roads. Veolia advised that those trucks that transport residual waste from the MBT to the Bioreactor return to the MBT via a truck wheel wash at the exit of the Bioreactor.	Compliant	
<i>O5 Other operating conditions</i>					
O5.1	The stormwater retention pond must be capable of containing all stormwater runoff generated at the premises during a 24-hour duration 1-in-100-year Average Recurrence Interval (ARI) rainfall event.	<ul style="list-style-type: none"> 2019 IEA 2017 SWLMP Draft SWLMP (Rev 0.2, 02/02/22) 	This was assessed as compliant in the 2019 IEA. The stormwater management scheme has not changed. Also refer to Table A-1, Schedule 3, Condition 19.	Compliant	
O5.2	The leachate aeration pond must be capable of accepting the leachate generated at the premises by any 1-in-10-year, 24-hour-period rainfall event without overflowing.	<ul style="list-style-type: none"> 2019 IEA 2017 SWLMP Draft SWLMP (Rev 0.2, 02/02/22) 	This was assessed as compliant in the 2019 IEA. The capacity of the Leachate Aeration Pond was extended in 2017 with the addition of the Eastern Evaporation Pond. Also refer to Table A-1, Schedule 3, Condition 7. The Auditors observe that the incident on 10/12/21 where the freeboard limit was exceeded, indicate that climate change impacts may necessitate further increasing the capacity of the leachate containment system.	Compliant	
O5.3	A freeboard of at least 0.5 metres must be maintained in the leachate aeration pond at all times.	<ul style="list-style-type: none"> Refer to Table A-1, Schedule 3, Condition 7 	The freeboard limit was exceeded on 10/12/21. Refer to Findings and Recommendations for Table A-1, Schedule 3, Condition 7	Non-compliant	Refer to NC1

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
O5.4 (as modified)	Feed stock of food and garden waste must be immediately transferred from the maturation pad to an enclosed building for processing.	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 Draft OEMP (Rev 0.2, 02/02/22) 	<p>This condition allows for food and garden waste to be delivered to the maturation pad. However, Veolia reconsidered and advised that food and garden waste, referred to by Veolia as Food Organics and Garden Organics (FOGO), is instead <i>"tipped into an enclosed processing area inside of the Organic buffer storage building using a hydraulic tipper"</i>. Veolia considered that this would reduce odour by carrying out the operation within an enclosed building.</p> <p>The Auditors also consider this approach preferable and therefore, compliant. However, the Auditors observed that the building was not fully enclosed as the door on the other side of the building was open to allow loaders to enter in and out of the building.</p>	Compliant	
5 Monitoring and Recording Conditions					
<i>M1 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.	<ul style="list-style-type: none"> Interviews with facility personnel on 24/03/22 and 28/03/22 Veolia, Woodlawn Bioreactor Facility - Surface Water Quality Monitoring - Site 140 (MBT), MBT Surface Water - Site 140 (Point 8).xlsx Veolia, Woodlawn Bioreactor - 	<p>Based on the Woodlawn Bioreactor Facility - Surface Water Quality Monitoring spreadsheet, pH measured in the field was not recorded. Although a Grab sample result was available, it was not collected in accordance with Condition M2.3. Refer to the Findings and Recommendations for Condition M2.3 regarding the sample method.</p> <p>This is considered non-compliant because pH monitoring results were missing. However, to avoid duplication of recommendations, the non-compliance is counted under Condition M2.3.</p>	Non-compliant	Refer to NC7

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		Groundwater Quality Monitoring, MBT Ground Water - WMBT11 (MB32) (Point 11).xlsx <ul style="list-style-type: none"> • Veolia, Woodlawn Bioreactor - Leachate Compliance Monitoring - WMBT, MBT Leachate - Leachate Pond (Point 12).xlsx 			
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.	<ul style="list-style-type: none"> • Interviews with facility personnel on 24/03/22 and 28/03/22 • Veolia, Woodlawn Bioreactor Facility - Surface Water Quality Monitoring - Site 140 (MBT), MBT Surface Water - Site 140 (Point 8).xlsx 	Monitoring data are generally available in a legible form within site records, for example Excel spreadsheets, as well as reported in Annual Returns and on the public website. However, field sheets and instrument calibration records may not be readily available for all monitoring requirements for which a recommendation was made in relation to Condition L2.4.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> • Veolia, Woodlawn Bioreactor - Groundwater Quality Monitoring, MBT Ground Water - WMBT11 (MB32) (Point 11).xlsx • Veolia, Woodlawn Bioreactor - Leachate Compliance Monitoring - WMBT, MBT Leachate - Leachate Pond (Point 12).xlsx • Annual Return 2019 • Annual Return 2020 • Annual Return 2021 			
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	<ul style="list-style-type: none"> • Veolia, Woodlawn Bioreactor Facility - Surface Water Quality Monitoring - Site 140 	Site records include the required information.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	d) the name of the person who collected the sample.	(MBT), MBT Surface Water - Site 140 (Point 8).xlsx <ul style="list-style-type: none"> • Veolia, Woodlawn Bioreactor - Groundwater Quality Monitoring, MBT Ground Water - WMBT11 (MB32) (Point 11).xlsx • Veolia, Woodlawn Bioreactor - Leachate Compliance Monitoring – WMBT, MBT Leachate - Leachate Pond (Point 12).xlsx • Woodlawn MBT Groundwater Sampling Data Sheet, 16 & 17/02/22 • Woodlawn MBT Leachate Sampling Data Sheet, 23/02/22 			

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
<i>M2 Requirement to monitor concentration of pollutants discharged</i>					
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	<ul style="list-style-type: none"> Refer to Condition M2.2 in relation to air monitoring requirements. Refer to Condition M2.3 in relation to air monitoring requirements. 2019 Annual Return Annual Return 2020 2021 Annual Return 	<p>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. Refer to Condition M2.2 in relation to air monitoring requirements, which was found to be non-compliant. This non-compliance is counted under Condition M2.2 to avoid duplication of recommendations,</p> <p>Refer to Condition M2.3 in relation to water and/or land monitoring requirements, in which a non-compliance with Point 8 pH monitoring sample method and frequency was found. A possible non-compliance with the frequency of TSS sampling was also found as previously discussed in the Findings for Condition L2.4. These non-compliances are counted under Condition M2.3 to avoid duplication of recommendations.</p>	Non-compliant	Refer to NC6 and NC7
M2.2	Air Monitoring Requirements (refer to Table in Licence).	<ul style="list-style-type: none"> Woodlawn Bioreactor - Depositional Dust Monitoring - West Void - DG24, MBT Master Record - Depositional Dust (Points 4, 6 & 7).xlsx 2021 Annual Return 	<p>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 was not met. This represents a non-compliance with both Conditions M2.1 and M2.2, although only one NC is counted to avoid duplication of recommendations.</p> <p>The 2021 Annual Return indicated that the "<i>laboratory has provided a safer means of transporting DDG's due to fragility of dust jars</i>". The Auditors make no further recommendation.</p>	Non-compliant	NC6
M2.3 (as modified)	<p>Water and/or Land Monitoring Requirements (refer to Tables in Licence).</p> <p><i>Note: Special Frequency 1 means once at the commissioning of the monitoring well.</i></p>	<ul style="list-style-type: none"> Interviews with facility personnel on 24/03/22 and 28/03/22 	The requirements of Conditions M2.1 and M2.3 were generally met except in relation to pH sampling and possibly TSS sampling at Point 8. Based on the Woodlawn Bioreactor Facility - Surface Water Quality Monitoring spreadsheet for Point 8, pH was not measured in the field with a 'Probe' on three occasions	Non-compliant	NC7

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> Veolia, Woodlawn Bioreactor Facility - Surface Water Quality Monitoring - Site 140 (MBT), MBT Surface Water - Site 140 (Point 8).xlsx Veolia, Woodlawn Bioreactor - Groundwater Quality Monitoring, MBT Ground Water - WMBT11 (MB32) (Point 11).xlsx Veolia, Woodlawn Bioreactor - Leachate Compliance Monitoring - WMBT, MBT Leachate - Leachate Pond (Point 12).xlsx 	<p>during the 2021 reporting period (22/12/20 to 21/12/21). Therefore, the sample method and frequency (daily during any discharge) were not met, making Condition M2.3 non-compliant.</p> <p>A 'Probe' sampling method is understood to mean sampling using a field instrument in the field and not by 'Grab sample', which is analysed in a laboratory. A Grab sample may be collected and analysed in addition to a Probe sample but should not be used as a substitute without EPA approval and/or appropriate justification. Based on the monitoring data, the Auditors observe that Grab samples may be analysed a week after collection of the sample. There were also significant differences between the pH measured in the field and the pH subsequently measured in the laboratory (e.g 7.0 versus 8.69, respectively).</p> <p>Veolia collected four samples at Point 8 (as recorded in their Surface Water Quality Monitoring spreadsheet) that were not reported in the Annual Return. However, discharge was occurring on at least one of those days, 10/12/21, and therefore, Veolia may not have been collecting a sample at the required frequency of 'daily during any discharge'. This would represent a non-compliance with sample frequency for Point 8 monitoring of TSS and pH.</p> <p>The Auditors recommend that Veolia review the monitoring requirements for Point 8 and ensure that pH is measured in the field by Probe and results are recorded and used for reporting purposes. Veolia may confirm the sampling methodology with the EPA as considered appropriate. The Auditors also recommend that Veolia ensure sample frequency requirements are met for Point 8.</p>		

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
			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, determine appropriate corrective actions to prevent a reoccurrence.		
<i>M3 Testing methods – concentration limits</i>					
M3.1	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p> <p>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or</p> <p>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p> <p><i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved</i></p>	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 ALS Certificate of Analysis, CA2103534, relating to Points 4, 6, and 7, 01/06/21 ALS Certificate of Analysis, CA2004463, relating to Points 4, 6, and 7, 03/07/21 	Records indicate that the concentration of Insoluble solids in air is monitored in accordance with the required sampling methodology.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<i>Methods for the Sampling and Analysis of Air Pollutants in NSW".</i>				
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	<ul style="list-style-type: none"> Site visit on 24/03/22 Interviews with facility personnel on 24/03/22 and 28/03/22 Veolia, Sampling Data Sheets for: <ul style="list-style-type: none"> Eco-Precinct Surface Water Sampling Data Form, relating to Point 1, 12/03/21 Quarterly Surface Water Sampling Data Sheet, relating to Point 1, 14/03/22 Woodlawn MBT Groundwater Sampling 	<p>Records indicate that the concentrations of pollutants in water are monitored generally in accordance with the required sampling methodology.</p> <p>As observed in relation to Condition L2.4, 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.</p> <p>The Auditors suggest as an OFI that Veolia 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.</p>	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> Data Sheet, relating to Point 11, 16 & 17/02/22 ○ Woodlawn MBT Leachate Sampling Data Sheet, relating to Point 12, 23/02/21 • NATA Certified, ALS Certificates of Analysis: <ul style="list-style-type: none"> ○ CA190607 3, relating to Point 1, 18/09/19 ○ CA210444 9, relating to Point 1, 15/07/21 ○ CA220175 6, relating to Point 8, 07/03/22 ○ CA220115 2, relating to Point 			

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		11, 17/02/22 ○ CA220129 9, relating to Point 12, 24/02/22			
<i>M4 Weather monitoring</i>					
M4.1	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively (refer to Table in Licence).	<ul style="list-style-type: none"> • Veolia, Excel spreadsheet 'Woodlawn_Hourly to 14_03_22.xlsx' • Q1 2019-20 MBT Meteorological Data – Continuous.pdf • Q2 2019-20 MBT Meteorological Data – Continuous (1).pdf • Q3 2019-20 MBT Meteorological Data – Continuous.pdf • Q4 2019-20 MBT Meteorological Data – Continuous.pdf 	<p>Records indicate that the required weather monitoring parameters are monitored generally in accordance with the required sampling methodology.</p> <p>Hourly average weather monitoring data is being monitored on a continuous basis in accordance with M4.1. Whilst the Auditors have not been provided with 24 hour average rainfall, it can be calculated from the 1 hour average data.</p>	Compliant	

24 May 2022

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> Hydrometric Consulting Services quarterly routine service and maintenance records for the weather station, Weather Station Calibration.pdf for 13/03/19, 17/06/19, 29/08/19, 20/11/19, 27/02/20, 21/05/20, 27/08/20, 25/11/20, 31/05/21 			
<i>M5 Recording of pollution complaints</i>					
M5.1	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.	<ul style="list-style-type: none"> Eco-Precinct Complaints Register 2019 – 2022 2019 Annual Return Annual Return 2020 2021 Annual Return AEMRs dated: 	Based on the Annual Returns and AEMRs, the Woodlawn MBT has not received any complaints. The Woodlawn Bioreactor Complaints Register is compiled as a spreadsheet that is a legible record and was readily available to the Auditors. There is no Complaints Register for the Woodlawn MBT as no complaints have reportedly been received that were found on investigation to be sourced from the Woodlawn MBT. Veolia have advised investigations for some complaints remain ongoing.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		<ul style="list-style-type: none"> December 2019 December 2020 December 2021 			
M5.2	<p>The record must include details of the following:</p> <p>a) the date and time of the complaint;</p> <p>b) the method by which the complaint was made;</p> <p>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;</p> <p>d) the nature of the complaint;</p> <p>e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</p> <p>f) if no action was taken by the licensee, the reasons why no action was taken.</p>	<ul style="list-style-type: none"> Eco-Precinct Complaints Register 2019 – 2022 NSW Woodlawn Eco Project Complaints Handling Procedure, PRO-13169-1, 20/04/2020 NSW Woodlawn ECO Project Odour Complaint Response, PRO-13168-1, 20/04/2020 NSW Woodlawn Eco-Precinct Complaint Form, TEM-5231-1 Site inspection and interview on 24 March 2022 	<p>The Auditors observed that no complaints have reportedly been received and recorded in the AEMRs to be found from the Woodlawn MBT. Veolia have advised that investigations are ongoing regarding complaints to determine the specific sources within the Eco-Precinct.</p> <p>The Complaints Handling Procedure and Complaint Form includes the requirements as specified in conditions M5.2 (a) – (f).</p> <p>The Woodlawn Bioreactor Complaints Register meets the requirements of this condition. The personal details are recorded separately to the published Complaints Register.</p> <p>The Auditors note that since the previous audit, revised procedures have been produced.</p>	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	<ul style="list-style-type: none"> Eco-Precinct Complaints Register – Formal Complaints 	<p>Veolia advised no complaints have been made directly related to the Woodlawn MBT.</p> <p>The Auditors reviewed the Woodlawn Bioreactor Complaints Register dating back to 27/03/2018. The Complaints Register has been maintained for the Woodlawn Eco-Precinct for a period greater than four years.</p>	Compliant	
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	<ul style="list-style-type: none"> Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer 	Veolia have advised that the EPA have not requested the complaints data during this Audit Period.	Not triggered	
<i>M6 Telephone complaints line</i>					
M6.1	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.	<ul style="list-style-type: none"> NSW Woodlawn Eco Project Complaints Handling Procedure, PRO-13169-1, 20/04/2020. Site inspection and interview on 24 March 2022 Signage at the entrance to the Woodlawn Eco-Precinct. The Tarago Times 	<p>The site has a Woodlawn Bioreactor Community Feedback Line: 1800 241 750, that is advertised in a number of ways including in The Tarago Times, a local community newsletter, and on the sign at the main entrance to the Woodlawn Eco-Precinct.</p> <p>The Auditors verified that the Woodlawn Bioreactor Community Feedback Line: 1800 241 750 was operational.</p>	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		https://www.tarago.org.au/our-management <ul style="list-style-type: none"> Call to the Woodlawn Bioreactor Community Feedback Line: 1800 241 750, 01 April 2022. 			
M6.2	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.	<ul style="list-style-type: none"> Signage at the entrance to the Woodlawn Eco-Precinct. The Tarago Times (https://www.tarago.org.au/our-management) 	The complaints line telephone number is advertised in The Tarago Times, a local community newsletter, and on the sign at the main entrance to the Woodlawn Eco-Precinct.	Compliant	
M6.3	The preceding two conditions do not apply until either the date of the issue of this licence.	<ul style="list-style-type: none"> EPL 20476 	Condition M6.1 and M6.2 apply as EPL 20476 was issued.	Compliant	
6 Reporting Conditions					
<i>R1 Annual return documents</i>					
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: <ol style="list-style-type: none"> a Statement of Compliance, a Monitoring and Complaints Summary, a Statement of Compliance - Licence Conditions, a Statement of Compliance - Load based Fee, 	<ul style="list-style-type: none"> Annual Return 22-12-2018 to 21-12-2019 Annual Return 22-12-2019 to 21-12-2020 Annual Return 22-12-2020 to 21-12-2021 	<p>Based on the EPA website Licence Summary, 3 Annual Returns have been submitted to the EPA during this Audit Period. The Auditors have reviewed completed Annual Returns for the 3 reporting periods.</p> <p>During the previous audit period, the Auditors confirmed that the site has a Pollution Incident Response Management Manual and a Pollution Incident Response Management Plan (PIRMP) that combined meet the requirements of the Protection of the</p>	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p>5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,</p> <p>6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and</p> <p>7. a Statement of Compliance - Environmental Management Systems and Practices.</p> <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>	<ul style="list-style-type: none"> eConnect EPA: Annual Return Submitted, 30-01-2020, 09-02-2021 and 16-02-2022. EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25/03/22. Veolia, NSW Pollution Incident Response Management Manual, 1/1/2018 (downloaded from the Veolia website). Veolia, Emergency Response Plan Incorporating Pollution Incident Response Management Plan For Woodlawn Bioreactor, MBT & LTP, 	Environment Operations Act 1997. No updates have been made during this Audit Period.		

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		619 Collector Road, Tarago NSW 2580, Crisps Creek Intermodal Facility, Bungendore Road, Tarago NSW 2580, Pylara Farm, 500 Collector Road, Tarago, NSW 2580, Document Reference: PRO-NSW-218-049-19, 1 August 2018. • 1 st 2019 IEA			
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. <i>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.</i>	• Annual Return 22-12-2018 to 21-12-2019 • Annual Return 22-12-2019 to 21-12-2020 • Annual Return 22-12-2020 to 21-12-2021	Annual Returns have been prepared in accordance with the condition of this consent.	Compliant	
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and			Not triggered	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<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> <p><i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i></p>				
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	<p>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').</p>	<ul style="list-style-type: none"> Annual Return 22-12-2018 to 21-12-2019 Annual Return 22-12-2019 to 21-12-2020 Annual Return 22-12-2020 to 21-12-2021 eConnect EPA: Annual Return Submitted, 30-01-2020, 09-02-2021 and 16-02-2022. 	<p>The Auditors have reviewed completed Annual Returns for the 3 reporting periods, which appeared to be supplied to the EPA via eConnect.</p>	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
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.	<ul style="list-style-type: none"> Site inspection on 24 March 2022 	The Auditors observed that the Annual Returns were retained by Veolia.	Compliant	
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>	<ul style="list-style-type: none"> eConnect EPA: Annual Return Submitted, 30-01-2020, 09-02-2021 and 16-02-2022. EPA's POEO Public Register EPL 20476, Licence Summary, downloaded 25 March 2022 	<p>The Auditors observe that the Annual Returns provided have a Company Secretary as the signatory. Based on the Licence Summary, the Annual Returns during this Audit Period have been submitted to and accepted by the EPA. On this basis, the Auditors assume that the Annual Returns, which were submitted electronically, were appropriately signed.</p> <p>As discussed in relation to Condition L2.4, 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.</p> <p>Further to the recommendations in relation to Conditions L2.4, M2.1 and M2.2, the Auditors recommend that Veolia 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.</p>	Non-compliant	NC8
<i>R2 Notification of environmental harm</i>					
R2.1	<p>Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p><i>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.</i></p>	<ul style="list-style-type: none"> Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer 	Veolia advised that EPA personnel were onsite the same day as the breach of the leachate pond and required Veolia to self report to the EPA. Veolia advised they were not required to notify via telephoning the Environment Line service on the day as the EPA were already onsite. No issues have subsequently been raised by the EPA regarding initial notification. The Auditors consider this condition has been complied with.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	<ul style="list-style-type: none"> Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer Email from EPA to Veolia dated 14/12/21, Request for a R3 Report for potential breach of EPL 20476 Licence Condition 	The leachate freeboard incident occurred 10/12/21 which occurred on the same day when EPA personnel were onsite. Email correspondence from EPA dated 14/12/21 advised Veolia to provide a written report in accordance with R3.3 by 12/01/21. Based on the EPA correspondence the Auditors do not consider that a written notification within 7 days was requested and therefore consider this condition as compliant.	Compliant	
<i>R3 Written report</i>					
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	<ul style="list-style-type: none"> Annual Return 22-12-2020 to 21-12-2021 Letter from Veolia, Western Leachate Pond Capacity – Woodlawn Mechanical Biological Treatment Facility – Environmental Protection Licence 	In response to the breach of the leachate pond triggering immediate corrective actions on 10/12/21, Veolia issued an incident report in response to a report issued by the EPA.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		No.29476 dated 12/01/22			
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.	<ul style="list-style-type: none"> Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer 	Veolia have advised that no additional inquiries have been made by the EPA in regard to the leachate pond incident.	Not triggered	
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	<ul style="list-style-type: none"> Letter from Veolia, Western Leachate Pond Capacity – Woodlawn Mechanical Biological Treatment Facility – Environmental Protection Licence No.29476 dated 12/01/22 Email from Veolia to EPA dated 12/01/22, Woodlawn MBT Environment Protection 	In accordance with consent condition, Veolia submitted a report to the EPA following the western leachate pond reaching freeboard on 10/12/21.	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		Licence 20476 R3 Report			
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.	<ul style="list-style-type: none"> Letter from Veolia, Western Leachate Pond Capacity – Woodlawn Mechanical Biological Treatment Facility – Environmental Protection Licence No.29476 dated 12/01/22 Interview with Facility Manager, Operations Supervisor, Process Engineer and Environmental Officer 	Veolia have advised that the NSW EPA has not yet responded to Veolia's letter dated 12/01/22 in regard to the breach of the leachate pond.	Not triggered	
<i>R4 Annual system performance report</i>					
R4.1 (as modified)	The Annual Return must be accompanied by/or include an Annual Report which must contain an assessment of environmental performance relevant to the licence conditions including: a) Tabulated results of all monitoring data required to be collected by this licence;	<ul style="list-style-type: none"> Notice of Variation of Licence No.20476 dated 20/12/21 	An Annual Return has not been submitted since the implementation of this condition on 20/12/21 as part of the Notice of Variation.	Not triggered	

Table A-2: Compliance with Environmental Protection Licence 20476					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	<p>b) a graphical presentation of data from a least the last three years (if available) in order to show variability and/or trends. Any statistically significant variations or anomalies should be highlighted and explained;</p> <p>c) an analysis and interpretation of all monitoring data;</p> <p>d) an analysis of and response to any complaints received</p> <p>e) identification of any deficiencies in environmental performance identified by the monitoring data, trends or incidents and of remedial action taken or proposed to be taken to address this deficiencies:</p> <p>f) recommendations on improving the environmental performance of the facility</p> <p><i>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.</i></p>				
7 General Conditions					
<i>G1 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.	<ul style="list-style-type: none"> Site inspection and interview on 24 March 2022 	<ul style="list-style-type: none"> A copy of the Licence was located in the breezeway of the Woodlawn MBT Admin Office. 	Compliant	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.			Not triggered	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	<ul style="list-style-type: none"> Site inspection and interview 	<ul style="list-style-type: none"> A copy of the Licence was located in the breezeway of the Woodlawn MBT Admin Office. 	Compliant	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
		on 24 March 2022			
8 Special Conditions					
<i>E1 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 institution" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by no later than 5pm on 24 February 2017. This financial assurance must be in favour of the EPA in the amount of two hundred thousand dollars (\$200,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.	<ul style="list-style-type: none"> 1st 2019 IEA 	This condition was assessed as compliant during the previous audit period.	Not triggered	
E1.2	The financial assurance must contain a term that provides that any money claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.	<ul style="list-style-type: none"> 1st 2019 IEA 	This condition was assessed as compliant during the previous audit period.	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.	<ul style="list-style-type: none"> Site interview with Environmental Compliance Manager 	Veolia have advised the financial assurance remains maintained during this Audit Period.	Noted	
E1.4	The financial assurance must be replenished by the full amount claimed or realised if the EPA			Not triggered	

Table A-2: Compliance with Environmental Protection Licence 20476

APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC#
	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.				
E1.5	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	
E1.6	The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: a) the financial assurance required by condition E1.1 and b) the adjusted financial assurance as required by condition E1.5 and E1.6	<ul style="list-style-type: none"> 1st 2019 IEA 	<p>Condition E1.6 (a) was assessed as compliant during the previous audit period.</p> <p>Condition E1.6 (b) has not been triggered.</p>	Not triggered	
E1.7	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	

APPENDIX B

PLANNING SECRETARY AUDIT TEAM AGREEMENT



Department of Planning and Environment

Ms Marea Rakete
Woodlawn Environmental Officer
Veolia Environmental Services (Australia) Pty Ltd
619 Collector Road
TARAGO NSW 2580

24/02/2022

Dear Ms Rakete

**Woodlawn Mechanical Biological Treatment Facility (MP 06_0239)
Independent Auditor 2022**

I refer to your letter of 14 February 2022 seeking approval of Mses Victoria Sedwick, Emily Rowe, Vanessa Perkins and Mr David Ford (the audit team) for the upcoming Independent Environmental Audit (audit) of Woodlawn Mechanical Biological Treatment Facility (the project), in accordance with Schedule 4, Condition 6 of the project approval MP 06_0239, as modified (the approval).

Having considered the qualifications and experience of the audit team, the Secretary endorses the appointment of the audit team to undertake the audit and prepare the audit report in accordance with Schedule 4, Condition 6 of the approval. This approval is conditional on the audit team being independent of the project.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing. Auditors may wish to have regard to the Independent Audit Guideline dated May 2020. A copy of this guideline can be located at <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>.

The audit report is to include the following:

1. consultation with the relevant agencies;
2. a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
3. not use the term "partial compliance";
4. recommend actions in response to non-compliances;
5. review the adequacy of plans and programs required under this consent; and
6. identify opportunities for improved environmental management and performance.

Within three months of the commissioning of the audit, Veolia is to submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.



Department of Planning and Environment

Prior to submitting the audit report to the Secretary, it is recommended that Veolia review the report to ensure it complies with the relevant approval condition.

Should you need to discuss the above, please contact Georgia Dragicevic, Senior Compliance Officer, on (02) 4247 1852 or by email to Georgia.Dragicevic@planning.nsw.gov.au.

Yours sincerely

Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

APPENDIX C

INDEPENDENT AUDIT DECLARATION FORM

INDEPENDENT AUDIT DECLARATION FORM


Project Name:	Woodlawn Mechanical Biological Treatment Facility
Consent Number:	Project Approval, MP 06_0239
Description of Project:	Construction and operation of a materials recycling facility
Project Address:	619 Collector Road, Tarago, New South Wales
Proponent:	Veolia Environmental Services (Australia) Pty Ltd
Title of Audit:	2022 Independent Environmental Audit of Veolia MBT Facility
Date:	24 May 2022

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 2020)*;
- 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 :

- 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
- 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:	Emily Rowe
Signature:	
Qualification:	Exemplar Global Lead Auditor Accreditation No.204997
Company:	Ramboll Australia Pty Ltd
Company Address:	PO Box 560, North Sydney NSW 2060

APPENDIX D

SITE INSPECTION PHOTOGRAPHS



Photo 1: Looking west towards the MBT Reception Building. One of the roller doors remained open after the trucks had unloaded and departed. 24/03/22



Photo 2: Looking north towards the Organic Buffer Storage Building. The northern roller door was left closed while the southern roller door was open for Loader access. 24/03/22


Title:	Independent Environmental Audit MP 06_0239	Project-No.:	Date:
Site:	Woodlawn MBT Facility	318001389	24/05/22
Client:	Veolia Environmental Services Pty Ltd		



Photo 3: Looking south towards the Organic Buffer Storage Building during unloading of food waste by the Colombia Tipper. 24/03/22



Photo 4: Looking east at the Fermentation Building with one of the roller doors open for transfer of food waste. 24/03/22



Title: Independent Environmental Audit MP 06_0239	Project-No.:	Date:
Site: Woodlawn MBT Facility	318001389	24/05/22
Client: Veolia Environmental Services Pty Ltd		



Photo 5: Biofilter #1 located within the eastern portion of the site looking towards the west. 24/03/22



Photo 6: Biofilters #2 and #3 within the central portion of the site with weeds growing on the filter media. 24/03/22

Title: Independent Environmental Audit MP 06_0239	Project-No.: 318001389	Date:
Site: Woodlawn MBT Facility		24/05/22
Client: Veolia Environmental Services Pty Ltd		

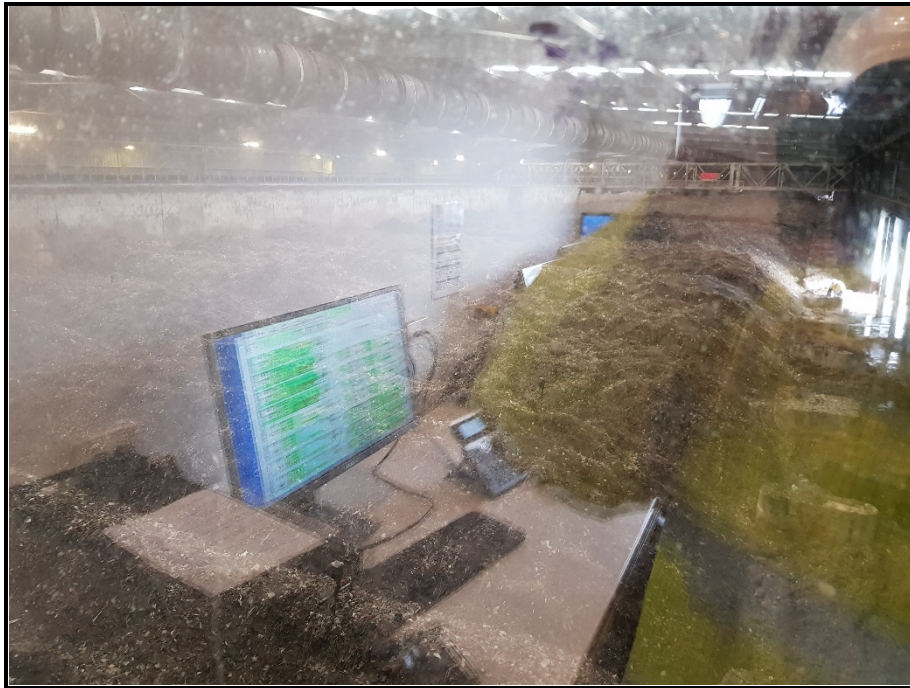



Photo 7: The Fermentation Building interior looking from the control room across the windrows of waste towards the west. 24/03/22



Photo 8: Fermentation Building Control Room process monitoring. 24/03/22

Title: Independent Environmental Audit MP 06_0239	Project-No.: 318001389	Date: 24/05/22
Site: Woodlawn MBT Facility		
Client: Veolia Environmental Services Pty Ltd		

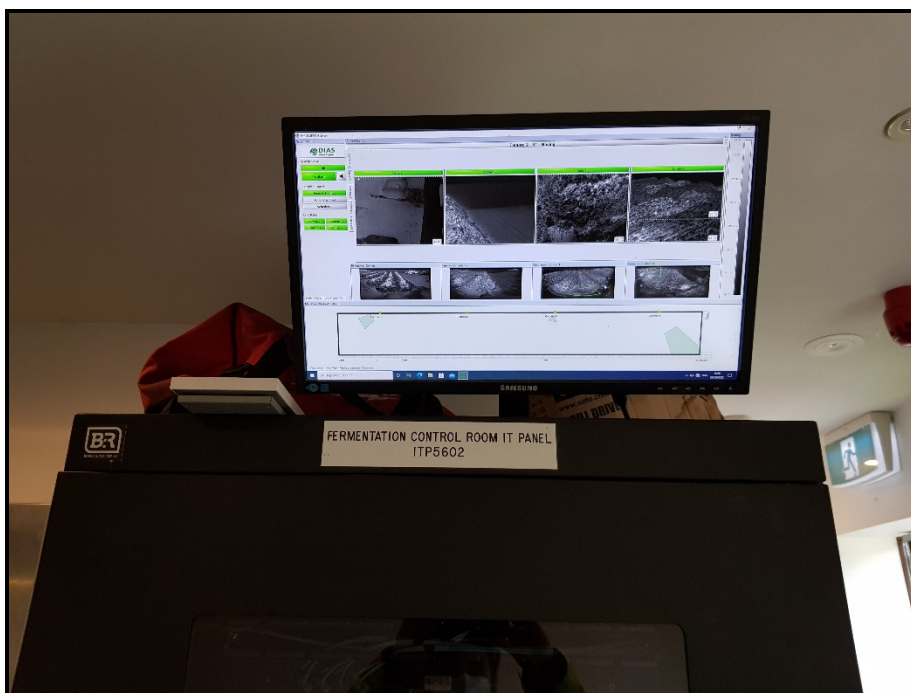


Photo 9: Fermentation Building Control Room thermal monitoring for fire protection. 24/03/22



Photo 10: Looking west with the Fermentation Building and Maturation Pad on the left, the leachate drainage system that drains towards the leachate ponds located behind the photographer. 24/03/22


Title: Independent Environmental Audit MP 06_0239	Project-No.: 318001389	Date: 24/05/22
Site: Woodlawn MBT Facility		
Client: Veolia Environmental Services Pty Ltd		



Photo 11: Looking south towards the Maturation Pad and Fermentation Building.
24/03/22



Photo 12: Looking south towards the Maturation Pad and Fermentation Building.
24/03/22


Title:	Independent Environmental Audit MP 06_0239	Project-No.:	Date:
Site:	Woodlawn MBT Facility	318001389	24/05/22
Client:	Veolia Environmental Services Pty Ltd		



Photo 13: Looking south towards the western end of the Maturation Pad and Fermentation Building with a fermented food waste windrow. 24/03/22



Photo 14: Fermented food waste windrow. 24/03/22


Title: Independent Environmental Audit MP 06_0239	Project-No.: 318001389	Date:
Site: Woodlawn MBT Facility		24/05/22
Client: Veolia Environmental Services Pty Ltd		



Photo 15: Embankment immediately to the west of the Maturation Pad and the food waste windrow with small fragments of weathered plastic visible. 24/03/22



Photo 16: Possible minor fuel leak from the Colombia Tipper. 24/03/22


Title: Independent Environmental Audit MP 06_0239	Project-No.: 318001389	Date: 24/05/22
Site: Woodlawn MBT Facility		
Client: Veolia Environmental Services Pty Ltd		



Photo 17: Looking east across the Western Leachate Pond and Eastern Evaporation Pond. The leachate was being aerated in the Western Leachate Pond. 24/03/22

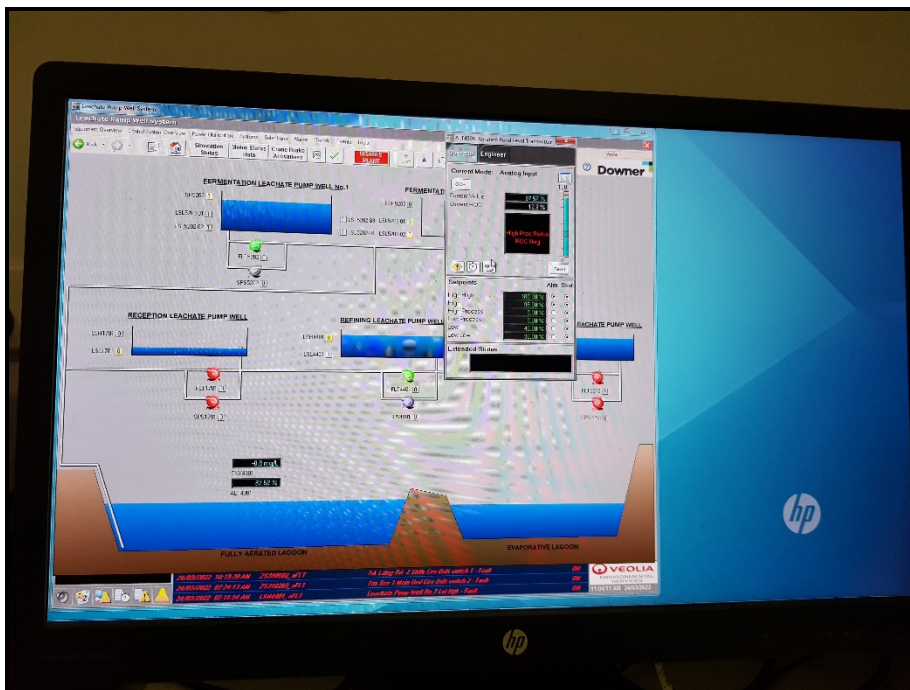



Photo 18: Process control screen in the Reception Building for the leachate ponds showing the level in the Western Leachate Pond (87.52%) and the setpoint alarms. 24/03/22

Title: Independent Environmental Audit MP 06_0239	Project-No.: 318001389	Date: 24/05/22
Site: Woodlawn MBT Facility		
Client: Veolia Environmental Services Pty Ltd		

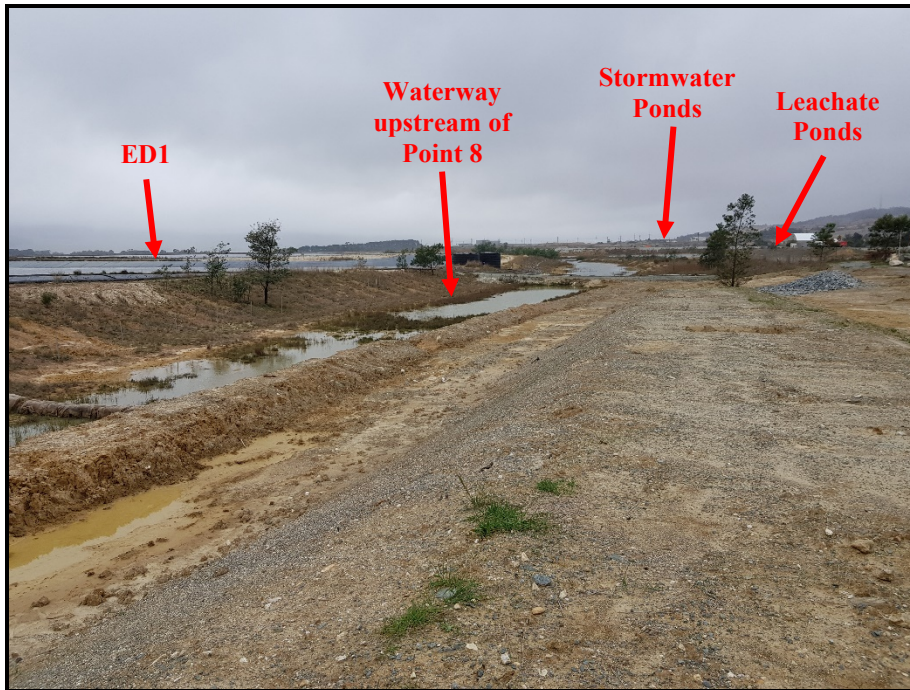


Photo 19: Looking east along the waterway towards the Stormwater Ponds, Evaporation Dam 1 (ED1) and the leachate ponds. Haybales located in the creek. Minimal grass cover and soil stabilisation controls along embankments. 24/03/22



Photo 20: Looking west along the waterway towards EPA Point 8 with ED2 on the right in the background. Some vegetation cover observed on the embankment in the foreground. 24/03/22



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Photo 21: Sedimentation control in the form of hay bales in the waterway, upstream of EPA Point 8. Some vegetation cover observed on the embankment. 24/03/22



Photo 22: Looking north across a drainage ditch and the waterway with ED2 in the background. Some vegetation cover observed on the embankments in the foreground but erosion also evident on far embankment. 24/03/22

Title: Independent Environmental Audit MP 06_0239	Project-No.: 318001389	Date: 24/05/22
Site: Woodlawn MBT Facility		
Client: Veolia Environmental Services Pty Ltd		

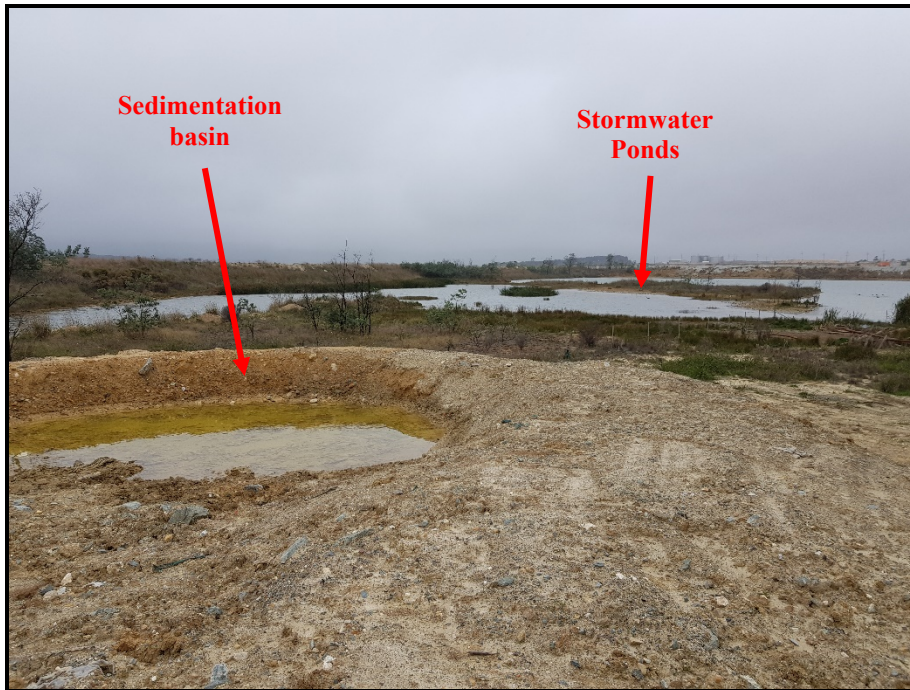


Photo 23: Sedimentation basin created following freeboard limit exceedance to prevent contamination of the Stormwater Ponds in the background. 24/03/22



Photo 24: Looking south along a stormwater drainage swale towards the Refining Building on the right. 24/03/22


Title: Independent Environmental Audit MP 06_0239	Project-No.:	Date:
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Client: Veolia Environmental Services Pty Ltd		



Photo 25: Bunded IBC containing waste oil with Spill Kit next to it. 24/03/22



Photo 26: Self-bunded white Diesel tank (2,500 L) and unbunded, portable, grey Diesel tank (~1,000 L), reportedly empty. 24/03/22


Title: Independent Environmental Audit MP 06_0239	Project-No.:	Date:
Site: Woodlawn MBT Facility	318001389	24/05/22
Client: Veolia Environmental Services Pty Ltd		



Photo 27: Unbundled, portable, grey Diesel tank (~1,000 L), reportedly empty with evidence of a minor spill from filling hose. 24/03/22



Photo 28: Self-bunded white Diesel tank (2,500 L) with Spill Kit next to it. 24/03/22

Title: Independent Environmental Audit MP 06_0239	Project-No.: 318001389	Date: 24/05/22
Site: Woodlawn MBT Facility		
Client: Veolia Environmental Services Pty Ltd	