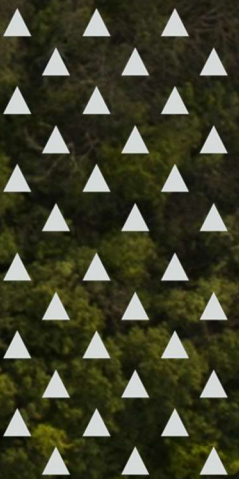


**Cleanaway ResourceCo Resource  
Recovery Facility  
SSD 7256**

**Independent Environmental Audit  
October 2022 Rev 0**





# Executive Summary

## *This audit*

Cleanaway ResourceCo RRF Pty Ltd (CRRRF) commissioned OptimE Pty Ltd (OptimE) to undertake an Independent Environmental Audit (IEA) of its Wetherill Park Resource Recovery Facility (the facility) in accordance with Condition C12 and C13 of the Project Approval SSD 7256 MOD 1 (Approval). The facility, located at 35-37 Frank St, Wetherill Park NSW comprised a Waste and Resource Management Facility to convert waste material into Process Engineered Fuel (PEF) and reusable commodities such as metal, timber, concrete, bricks, rubble and soil. This audit covers the operational period of 1 February 2019 to 31 July 2022.

As-built conditions addressed prior to the operational period, which influence the performance of the plant, have also been considered in the scope of this audit. Construction related conditions were excluded.

## *Consultation with agencies and regulatory action*

The auditor consulted with relevant agencies by letter as part of the scope of this audit. The letters invited agencies to comment on CRRRF compliance with the conditions of approval and environmental performance generally.

- The NSW Environment Protection Authority (EPA) reported it had inspected the site on nine occasions during the reporting period and had taken regulatory action in response to multiple alleged breaches of the Act related to storage of waste and dust.
- Fairfield City Council (FCC) reported that previous fire safety concerns had been investigated and resolved to FCC's satisfaction. FCC also noted an administrative matter related to an outstanding occupation certificate, which was resolved prior to finalising this report.
- NSW Fire and Rescue (FRNSW) did not report any outstanding matters associated with the facility.

## *Environmental performance*

Environmental performance of the facility was determined by comparison of actual performance versus the predictions made in the Environmental Impact Statement (EIS). The audit findings concluded the following:

Waste management	CRRRF has been the subject of regulatory activity by the EPA regarding waste processing and storage at the facility. However, CRRRF has responded positively to the regulatory action and at the time of the audit, waste processing and storage issues had been adequately addressed.
Odour	Likely negligible impacts to the surrounding industrial receivers and distant residential receivers.
Noise	Low noise impacts to the surrounding industrial receivers and distant residential receiver.
Dust	<p>CRRRF has been the subject of regulatory activity by the EPA regarding dust emissions from the facility. CRRRF has responded positively to the regulatory action and at the time of the audit, dust management had improved significantly.</p> <p>The facility does however generate a large amount of dust within the processing hall and is heavily reliant on dust controls to prevent environmental dust emissions.</p>
Leachate and fire water systems	Constructed in accordance with the requirements of the Approval and FRNSW.
Stormwater system	The stormwater system at the facility was being managed in accordance with the predictions of the EIS and the requirements of the Approval.

### *Assessment of Compliance*

The facility demonstrated a high level of compliance with its Approval, Environmental Protection Licence (EPL) and Operational Environmental Management Plan (OEMP). A high level of compliance was demonstrated in relation to:

- operating within its limit of consent
- maintained an EPL with the EPA
- waste management (except for waste storage)
- pest, vermin and noxious weed management
- stormwater management (except for stormwater monitoring)
- operational noise
- traffic impacts
- complaints
- implementation of the OEMP and associated sub-plans.

In total, twenty non-compliances were identified by this audit, however numerous requirements are repeated between assessable documents. A summary of the non-compliances recorded against the assessable documents is provided below.

Approval	<ul style="list-style-type: none"><li>• Comply with written requirement(s) of the Planning Secretary as they related to the previous Audit Actions Plan.</li><li>• Waste storage</li><li>• Surface water monitoring</li><li>• Dust management</li><li>• Landscaping</li><li>• Review of the OEMP and supporting sub-plans</li><li>• Annual reviews</li><li>• Timing of the audit</li><li>• Publicly available information on the webpage</li><li>• The non-compliances also triggered non-compliance against conditions A1 and A2.</li></ul>
EPL	<ul style="list-style-type: none"><li>• Waste storage</li><li>• Dust management</li><li>• OEMP audit</li></ul>
OEMP and sub-plans	<ul style="list-style-type: none"><li>• Landscaping</li><li>• Surface water monitoring</li><li>• Updating the approved calculation in the Energy from Waste Management Plan</li></ul>

### *Adequacy of management plans*

The 2019 IEA confirmed the OEMP and sub-plans had been prepared in compliance with the Approval. Opportunities to improve the effectiveness of the plans were identified in the 2019 IEA, however the plans were not reviewed during this audit period, and the recommended improvements were not implemented. The outstanding recommendations from the 2019 IEA have been incorporated into the findings of this audit.

### *Recommendations and improvement opportunities*

Nine (9) recommendations including five (5) outstanding recommendations from the 2019 IEA were made to address non-compliances identified by this audit. Eight (8) improvement opportunities including five (5) outstanding improvement opportunities from the 2019 IEA were also identified. These are presented in Section 4 of this report.

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**Appendix B** Planning Secretary approval letters

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**Appendix D** Independent audit declaration form

**Appendix E** Status of the 2019 IEA Action Plan - Summary table

**Appendix F** Site inspection photographs

# 1 Introduction

## 1.1 Background

Cleanaway ResourceCo RRF Pty Ltd (CRRRF) commissioned OptimE Pty Ltd (OptimE) to undertake an Independent Environmental Audit (IEA) of its Wetherill Park Resource Recovery Facility (the facility) in accordance with Condition C12 and C13 of the Project Approval SSD 7256 MOD 1 (Approval).

The Approval for the project was granted on 10 April 2017 and operations at the facility commenced in June 2018.

The first IEA was undertaken for the reporting period 1 June 2018 to 31 January 2019. This IEA report represents the second IEA for the project and covers the period 1 February 2019 to 31 July 2022. Refer to Section 1.4 for discussion on the nominated audit period.

## 1.2 Site description

The facility, located at 35-37 Frank St, Wetherill Park NSW comprised a Waste and Resource Management Facility to convert waste material into Process Engineered Fuel (PEF) and reusable commodities such as metal, timber, concrete, bricks, rubble and soil. The facility includes the following key built elements:

- Industrial sheds for housing the facility operations
- Processing equipment capable of converting up to 250,000 tonnes of relevant waste materials per year into approximately 150,000 tonnes of PEF and over 75,000 tonnes of reusable commodities
- Workshop, office and staff amenities
- Vehicular access and internal roadways, weighbridge and 42 car parking spaces in two car parking areas
- Stormwater management system for collection of water for reuse in the processing system, and dust suppression or treatment and discharge from the site, including a 300kL underground stormwater storage tank and two above ground tanks with combined capacity of 27kL
- 25kL diesel fuel tank.

## 1.3 Audit objectives and scope

The objective of this IEA was to assess the environmental performance of the development, whether it is complying with key regulatory requirements and to recommend any appropriate measures to improve environmental performance.

The scope was developed by the auditor to address and respond to:

- Condition C12 and C13 of the Approval. Table 1 lists the requirements of these conditions and where each requirement addressed within this report
- Conditions relevant to the operational phase of the development applicable to the audit period
- Areas of focus identified by the regulatory agencies during the pre-audit consultation process (refer to Section 3.2)
- Consultation with the auditee.

Table 1 Independent Environmental Audit (IEA) Conditions

Condition No.	Requirement	2022 IEA reference
C12	Within six months of the commencement of operation, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development.  This audit must:	Section 1.4
(a)	be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;	Section 1.6, Appendix B
(b)	include consultation with the relevant agencies;	Section 3.2
(c)	assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals)	Section 3.4, Section 3.5, Appendix A
(d)	review the adequacy of any strategies, plans or programs required under the abovementioned consents;	Section 3.11
(e)	recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these consents.	Section 4
C13	Within two months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Appendix A Table A1, Condition C13, Appendix B

## 1.4 Audit period

Condition C12 specified that:

*“Within six months of the commencement of operation, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development...”*

The first IEA was undertaken for the reporting period 1 June 2018 to 31 January 2019. This report documents the second IEA for the development and covers the period 1 February 2019 to 31 July 2022.

The audit period for the second IEA was extended from 3 years (36 months) to 3.5 years (42 months) due to a six-month delay in the start of the audit process. It was agreed between the auditor, auditee and DPE that extending the audit period would provide a more contemporary audit finding, most representative of the development’s environmental performance and compliance.

Correspondence with DPE associated with the audit period is attached as Appendix B.

## 1.5 Key documents within the scope of the audit

CRRRF development performance was assessed against the key requirements of the following documents:

- Development Application (SSD 7256) and associated schedules and appendices (MOD1)
- EPA Environmental Protection Licence (EPL) No. 20937, 14 May 2018
- Operational Environmental Management Plan, GHD, 14 March 2018, Version 5
- Water Management Plan, GHD, 9 March 2018, Version 3
- Leachate Management Plan, GHD, 12 March 2018, Version 3
- Air Quality Management Plan, GHD, 22 February 2018, Version 1
- Landscape Management Plan, GHD, 22 February 2018, Version 1
- Environmental Impact Statement titled Waste and Resource Management Facility SSO 15-7256, ResourceCo Pty Ltd dated 8 March 2016
- Response to Submissions titled Response to Submissions Waste and Resource Management Facility SSD 15-7256, ResourceCo Pty Ltd dated 28 November 2016.

## 1.6 Audit team and participants

Maurice Pignatelli was the nominated lead auditor. He met DPE criteria set out by Condition C12 of the Approval and was endorsed by DPE prior to commencement of the audit. A copy of the approval letter<sup>1</sup> is attached as Appendix B to this report.

CRRRF personnel that participated in the audit were:

- Cleanaway ResourceCo General Manager (interview and close meeting)
- HSEQ Manager (interviews, open/close meetings and site inspections)
- Maintenance Manager (interview and site inspection)
- Weigh bridge operator (interview and site inspection)
- Traffic controller and plant operators (site inspection).

## 1.7 Limitations of this report

This report has been prepared by OptimE for CRRRF and may only be used and relied on by CRRRF for the purpose agreed as set out in Section 1.3 of this report. OptimE disclaims responsibility to any organization or person other than CRRRF arising in connection with this report.

The services undertaken by OptimE in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report. The opinions, conclusions and any recommendations in this report are based on conditions encountered, evidence sampled, and other information reviewed at the date of preparation of the report.

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<sup>1</sup> DPE Letter "ResourceCo RRF (SSD-7256), Independent Auditor Endorsement" dated 29 July 2022



## 2 Audit methodology

### 2.1 Audit approach

This audit was undertaken in accordance with *AS/NZS ISO 19011:2014 – Guidelines for auditing management systems*. OptimE maintained open and transparent communications with all parties throughout the audit process to provide assurance of a fair and objective assessment of the development's performance and compliance status against the requirements of the conditions of consent and associated documents.

### 2.2 Audit stages

The audit was undertaken under the stages and program outlined in Table 2.

Table 2 Audit stages and program

Stage	Program
Audit commissioned	29 July 2022
Consultation with agencies	10 August 2022 to 13 September 2022
Audit protocol submitted	8 August 2022
Desk-top review	15 August 2022 to 20 August 2022
Audit interviews	22 August 2022 and 26 August 2022
Site inspections	26 August 2022
Analysis	15 August 2022 to 13 September 2022
Reporting	29 August 2022 to 17 October 2022
CRRRF response to the IEA	17 October 2022 – 31 October 2022
Agreed IEA delivery date	31 October 2022

Condition C13 specified that:

*“Within two months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.”*

At the commencement of the audit, CRRRF sought an extension of time from DPE for the purpose of providing additional time for consultation with regulatory agencies. DPE agreed to an extension of time until 31 October 2022 to submit the finalised Independent Environmental Audit report to the Department, together with the auditee response to any recommendations in the audit report.

A letter from DPE<sup>2</sup> associated with an extension of time for the audit report is attached as Appendix B.

#### 2.2.1 Audit protocol

An audit protocol was prepared which listed the documentary evidence and lines of inquiry proposed by the auditor to assess compliance with each condition. The audit protocol was in tabulated form and was provided to CRRRF two weeks prior to the audit interview. CRRRF was encouraged to provide the listed documentary evidence to the auditor prior to the audit interview.

<sup>2</sup> DPE Letter “ResourceCo RRF (SSD-7256), Extension to Independent Environmental Audit” dated 8 August 2022.

### 2.2.2 Desk-top review

A desk top review of documentary evidence provided prior to the audit interview was undertaken by the auditor. The audit protocol was updated prior to the audit interview with more targeted questions flowing on from the desk-top review.

### 2.2.3 Consultation with the agencies

Letters were issued to relevant agencies referenced in the Approval. The letters invited agencies to comment on the development's compliance with the conditions of approval and environmental performance generally. Three weeks was provided for the agencies to respond, and a reminder email was sent to agencies that had not contacted Optime, one week prior to the due date.

### 2.2.4 Site inspection

A site inspection was undertaken at the facility. The walk-through site inspection was guided by a pre-prepared checklist of key observations. The inspection sought to determine the following:

- Operations in accordance with the OEMP and supporting plans
- Implementation and effectiveness of environmental controls
- Impact of the facility on the environment
- Confirm information provided during the audit interviews.

The auditor was accompanied by the site's HSEQ Manager.

### 2.2.5 Interviews

The interviews were guided by the updated audit protocol. Documentary evidence and site observations were sought to corroborate responses provided by CRRRF personnel.

A close meeting was conducted at the completion of the interviews. This meeting covered preliminary audit findings, outstanding information and program for completion of the audit. A follow up information request was provided to CRRRF following the meeting.

### 2.2.6 Reporting

The first draft report was submitted to CRRRF for review for consistency with the conditions of approval and to identify any factual errors. Any material amendments to the report, following the CRRRF review were acknowledged in the final report.

## 2.3 Compliance status descriptors

The compliance status of each compliance requirement in the Audit Compliance tables in Appendix A has been determined using the relevant descriptors below, in accordance with DPE's Independent Audit, Post Approval Requirements (IAPAR), May 2020.

- **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.

For transparency, where CRRRF were not able to provide sufficient verifiable evidence to demonstrate compliance or non-compliance, a determination was made by the auditor based on available information and a "*limitation of compliance status*" was recorded.

## 3 Audit findings

### 3.1 Documentary evidence

All documents reviewed as part of the IEA are referenced in the “Evidence Collected” column of the compliance tables attached to this report as Appendix A.

### 3.2 Consultation with relevant agencies

#### 3.2.1 Consultation log

Letters were issued to relevant agencies referenced in the Approval. The letters invited agencies to comment on CRRRF compliance with the conditions of approval and environmental performance generally. A log of correspondence with the agencies and a copy of material correspondence, is provided in Appendix C of this report.

A summary of agency responses is provided in the sub-sections below.

#### 3.2.2 Response from Environment Protection Authority (EPA)

EPA advised that:

- An EPL was issued for the entirety of the audit period. During this time, the EPA conducted nine inspections of the Premises.
- The EPA was aware of two fire incidents (20 August 2019 and 30-31 August 2020)
- The EPA issued a Licence Variation on 25 January 2021 (See EPA record 1603927). The Variation included a Pollution Reduction Program (PRP) that required the Licensee to undertake an independent Fire Mitigation and Risk Review. The PRP remained in place on the Licence for the remainder of the Period.
- During the Period, the EPA undertook regulatory action in response to multiple alleged breaches of the Act.

A summary of regulatory action by the EPA is outlined in Section 3.3

A copy of the EPA correspondence with the auditor is provided in Appendix C of the report.

#### 3.2.3 Response from Fairfield City Council (FCC)

FCC advised:

- Previous fire safety concerns at CRRRF had been investigated and resolved to Council's satisfaction.
- Council would not undertake an audit of the facility as the facility is a State Significant Development.
- Council has not been provided with an occupation certificate for the building works approved as part of construction certificate 16/1688/04, issued by Steve Watson & Partners on 29 May 2018, and this should be arranged.

*Refer to Improvement Opportunity 2022 IO-01 in Section 4.2 of this report.*

A copy of the FCC correspondence with the auditor is provided in Appendix C of the report.

#### 3.2.4 Response from Fire and Rescue NSW (FRNSW)

FRNSW advised:

- FRNSW inspected the premises 2 years ago due to the receipt of a fire safety concern, and an ensuing Letter was issued to Fairfield Council.

- FRNSW is not an auditing agency and recommended a suitably qualified Building Surveyor be engaged to perform the audit.

CRRRF confirmed that following the concerns raised by FRNSW, and as required by Condition U1.1 of the EPA licence, a Fire Mitigation and Risk Review<sup>3</sup> had been undertaken by GHD Pty Ltd.

CRRRF advised that during the preparation of this audit report, FRNSW conducted an inspection of the site. By email, FRNSW noted that the visit did not constitute a fire safety audit. However, they observed a noticeable and remarkable improvement on the site. No immediate concerns were raised.

A copy of the FRNSW correspondence with the auditor is provided in Appendix C of the report.

### 3.3 EPA regulatory activity

CRRRF has been the subject of regulatory activity by the EPA during the audit period, as summarised in Table 3.

*Table 3 Summary of EPA Notices*

Notice/Date	Notice type	Summary of Notice <sup>4</sup>
Notice 1576340: 22/02/2019	Notice of Variation of Licence 20937	At the request of CRRRF, the EPL was varied to accept waste from the Barangaroo South Precinct.
Notice 1576451: 01/03/2019	Penalty Notice	Contravene condition of licence – Corporation Offence date: 24/01/2019 Reason – non-compliance with condition L2.3 of the Licence in that the Licensee was storing waste outside of permitted areas.
Notice 1577846: 30/04/2019	Notice of Variation of Licence 20937	At the request of CRRRF, the EPL was varied to change hours of operation. Obsolete licence conditions were also removed.
Notice 1583536: 20/08/2019	Notice of Variation of Licence 20937	At the request of CRRRF, the EPL was varied to change hours of operation, consistent with the modified Development Approval.
Notice 1602485: 10/11/2020	Penalty Notice	Contravene condition of licence – Corporation Offence date: 29/10/2020. Reason – non-compliance with condition L2.3 of the Licence in that the Licensee was storing waste outside of permitted areas.
Notice 1603927: 25/01/2021	Notice of Variation of Licence 20937	EPL varied to address observations made by EPA and FRNSW associated with waste storage and fire risk. Pollution Reduction Program and studies were added to the EPL.
Notice 3501381: 01/11/2021	Prevention Notice	The EPA suspected CRRRF was undertaking activities in an environmentally unsatisfactory manner including: <ul style="list-style-type: none"> <li>• storage of wastes</li> <li>• accumulation of dust increasing the risk of fire</li> </ul>

<sup>3</sup> GHD Letter dated 26/03/2021, ResourceCo Wetherill Park CAN 01 – Documentation Review of Emergency Plan, Ref: 12540264 CAN01 Rev 0

<sup>4</sup> The summary of notices has been provided as an overview of EPA regulatory activity on the development. Please refer to the POEO public register (<https://apps.epa.nsw.gov.au/prpoeoapp/>) for full details.



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		<ul style="list-style-type: none"> <li>waste and sediment laden water flowing from the premises and likely to cause pollution.</li> </ul> <p>The Prevention Notice required CRRRF to stop receiving waste and clean-up the site to reduce the risk of fire and prevent pollution.</p>
Notice 3503002: 29/07/2022	Penalty Notice	<p>Contravene condition of licence – Corporation Offence date 04/11/2021. Reason – non-compliance with condition O1.1 of the Licence in that the Licensee failed to store waste in a competent manner.</p>

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Observations made by the EPA, as documented in the statutory instruments above have been considered when determining compliance with the Approval and the EPL, for the audit period.

### 3.4 Environmental performance

#### 3.4.1 Operations overview

##### *Waste receipt*

Records sighted for the purposes of this audit and interviews confirmed that waste is only accepted on site from prequalified customers that fulfill the requirements of the NSW Energy from Waste Policy Statement. Customers arrive to the site report to the weighbridge where the waste type is confirmed to meet the acceptance criteria before the vehicle is permitted to enter the site. All accepted waste is received in the waste receipt area within the process building. A receipt inspection officer inspects the waste as it is being unloaded to verify the waste type is consistent with the acceptance criteria. The facility has Standard Operating procedures to identify and manage unauthorised materials.

This audit has concluded that that waste receipts activities at the facility were being undertaken in accordance with the predictions of the EIS and the requirements of the Approval.

##### *Waste processing and storage*

CRRRF has been the subject of regulatory activity by the EPA regarding waste processing and storage at the facility. On 4 November 2021, the EPA officers observed:

- Unprocessed waste within the processing shed was stockpiled against the walls of the shed and obstructed internal walkways used for access and egress. The waste appeared to consist of mixed waste with large amounts of timber and plastics.
- There was no separation or segregation identified within the unprocessed waste stockpile within the processing shed. There was minimal access for emergency services to combat a fire in the event a fire occurred within the waste stockpile.
- Waste was observed to be spilling onto the concrete forecourt of the Premises from the partially opened door of the processing shed.

In response to these observations, the EPA issued CRRRF a Prevention Order<sup>5</sup>. Since the Prevention Order, CRRRF has:

- removed excess waste from the facility
- installed bays to store waste within designated areas
- repaired rapid roller doors to enable them to close
- implemented daily checks and reports to confirm waste is stored correctly.

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<sup>5</sup> NSW EPA Prevention Notice 35011381 dated 10/11/21.

Site observations confirmed:

- all wastes were stored within the main building within designated waste bays for waste types.
- whilst there was minor litter (PEF) at the areas surrounding the building. There was no evidence of the litter impacting public roads.
- solid fencing was provided to minimise the likelihood of litter impact to neighboring properties.

This audit has concluded that during the audit period, EPA observations confirm that CRRRF did not undertake waste processing and storage at the facility in accordance with the predictions of the EIS and the requirements of the Approval. However CRRRF has responded positively to the regulatory action by the EPA, and at the time of the audit, waste processing and storage issues had been adequately addressed.

#### *Waste streams and disposal*

Waste is processed to separate waste streams, which are sent to waste management facilities. CRRRF reports all wastes transported from the site to the EPA monthly. The reports confirm wastes are transported to a waste management facility or premises lawfully permitted to accept the waste.

This audit has concluded that waste streams and disposal activities at the facility were being undertaken in accordance with the predictions of the EIS and the requirements of the Approval.

### **3.4.2 Noise**

The Noise Impact Assessment Report<sup>6</sup> which informed the EIS predicted that noise impacts to residential, active recreational and industrial receivers would meet the relevant noise criterion. The assessment considered sound pressure levels of all plant and equipment operating at the facility, worst case operations and adverse meteorological conditions. It predicted boundary noise levels of 70 and 75 LAeq (dBA).

An assessment of operational noise from the site was undertaken by Wilkinson Murray in May 2019<sup>7</sup>, specifically for the purpose of changes to the operating hours to 24-hour use of the facility. Noise from the CRRRF was measured to be 75dBA at the loudest point along the nearest industrial boundary. Wilkinson Murray further noted that once including the expected reduction from the boundary fence (a 4-5m high barrier fence along the eastern boundary of the site), a noise level of 65dBA would be expected which is always compliant with the criteria for the surrounding industrial receivers in the day and night period. Wilkinson Murray concluded compliance with criteria is achieved at adjoining industrial receivers.

Further, Wilkinson Murray determined that noise from the facility was inaudible at the location of the RES1 receiver in an 51dB ambient noise environment. Wilkinson Murray concluded that the measured and predicted noise levels indicate compliance with the NPfI criteria at the location of the nearest noise sensitive residential receiver, and noise from 24-hour use of the facility is not expected to have any impacts at the nearest noise sensitive residential receivers.

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<sup>6</sup> Wilkinson Murray, Waste and Resource Management Facility, Noise Impact Assessment. Report 15278-N Version A, 28 January 2016.

<sup>7</sup> Wilkinson Murray, Extension of Operating Hours 15278-N Version B dated May 2019

### 3.4.3 Air quality management

The Air Quality Impact Assessment Report <sup>8</sup> (AQIAR) which informed the EIS identified dust and odour as the pollutants with the potential to result in air quality impacts.

#### *Dust emissions*

The AQIAR predicted that dust and particulate matter emissions impacts from the project would have a negligible contribution to air quality at sensitive residential receptors and the impact assessment criteria would be met at all receptors. The assessment considered estimated annual levels of total suspended particles from operational activities and used dispersion modelling to predict impacts on surrounding receptors.

CRRRF has been the subject of regulatory activity by the EPA regarding dust emissions from the facility. During the reporting period, the EPA issued a Prevention Notice on 10 November 2021 in relation to a report received by the EPA on 2 November 2021 and subsequent observations made by EPA officers on 4 November 2021. In relation to dust, the Prevention Notice stated:

*“On 2 November 2021 the EPA received a report of ‘excessive dust and hazy conditions’ coming from the Premises on 1 November 2021. The report also stated that excessive dust had left the Premises on two previous occasions on 20 September 2021 and 26 October 2021.*

And, on 4 November 2021, the EPA officers observed:

*“An accumulation of fine dust on internal horizontal structures within the processing shed, with some areas estimated to have an accumulation exceeding 15cm in depth. This dust appeared to further increase the fire risk at the Premises.”*

In addition, a complaint was recorded on 15 October 2020 relating to dust, by an employee of a neighboring industrial property.

Since the Prevention Order, CRRRF has implemented the following dust controls:

- when trucks tip, sprinklers are triggered by spotters, if required for dusty loads.
- A fogger system has been installed across the conveyor lines
- dust filtration system (sock) has been installed
- polo citris (soapy agent) mister is applied at key drop points and shredders
- regular cleaning of horizontal surfaces within the process building
- daily check for dust and dust build-up is undertaken by the HSE Manager and recorded on the daily checklist.

During the site inspection, it was observed that working areas within the building, whilst dusty, did not exhibit excessive dust build-up. Clean-up crews were observed removing dust from accessible areas such as the factory floor and walkways. Areas more difficult to access such as metal framework did exhibit a high dust loading. CRRRF advised that these areas are typically maintained during major shut-down periods.

Discussions with site personnel confirmed that receivals area sprays and plant foggers are manually operated by the traffic controller and plant operator respectively. The Maintenance Manager advised that further improvements are proposed to the fogger systems allowing more targeted zoning of dust generating areas.

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<sup>8</sup> Wilkinson Murray, Waste and Resource Management Facility, Air Quality Impact Assessment. Report 15278-AQ, Version A, 28 January 2016.

This audit has concluded that during the audit period, EPA observations confirm that CRRRF did not manage dust in accordance with the predictions of the EIS and the requirements of the Approval. However CRRRF has responded positively to the regulatory action by the EPA, and at the time of the audit, dust management had improved significantly. The additional dust controls should be documented in the Air Quality Management Plan.

*Refer to Recommendation 2022 R-01 in Section 4.1 of this report.*

#### *Dust Monitoring*

The site voluntarily established Dust Deposition Gauges (DDGs) to monitor environmental dust emissions. The DDGs are located at each corner of the site perimeter and two DDGs midway along the longest site boundaries. AirSafe was engaged to sample the DDGs monthly. The AirSafe reports triggered an “exceedance” where the average monthly reading at a gauge was greater than 4g/m<sup>2</sup>/month, as per EPA Environmental Guidelines. CRRRF collates the data into an Air and Dust Monitoring register. The data is summarised in Table 4.

*Table 4 Dust monitoring data*

Period	Exceedances of EPA environmental guidelines (4g/m <sup>2</sup> /month)
Dec21-Jan22	DDG 3 (4.4g/m <sup>2</sup> /month) DDG 5 (4.2g/m <sup>2</sup> /month)
Jan22-Feb22	Nil
Feb22-Mar22	Nil
Mar22- Apr22	Nil
Apr22-May 22	DDG 2 (4.1g/m <sup>2</sup> /month)
May22-Jun22	Nil
Jun22-July22	DDG 5 (4.5g/m <sup>2</sup> /month)

The dust level exceedances were recorded predominantly on DDGs located on the eastern boundary of the site. CRRRF advised that the exceedances were not likely due to operational dust attributable to waste receipt, processing or storage as major building openings are not located adjacent to the eastern boundary. Large building openings are located adjacent to the western boundary.

CRRRF advised that dust level exceedances may be attributable to the following sources:

- Windblown dust generated from vacant land across Frank Street and to the east of the site
- Localised dust generated from the unsealed driveway (the sealed pavement of the driveway along the eastern boundary of the site has been partially removed for stormwater rectification works).

On this basis, the CRRRF interpretation of the site’s dust impact, associated with waste management, to surrounding environment is reasonable given the location of the dust monitors that exceeded the criteria, relative to the potential dust sources from the site.

This audit has concluded that whilst recent monitoring has identified exceedances against the EPA Environmental Guidelines dust deposition criteria, these exceedances were not likely attributable to



the facility's waste management operations. The facility does however generate a large amount of dust, within the processing hall, and is heavily reliant on dust controls to prevent environmental dust emissions.

On this basis, CRRRF should consider the use of real-time environmental dust monitoring for early detection of conditions that may generate environmental dust emissions.

*Refer to Improvement Opportunity 2022 IO-02 in Section 4.2 of this report*

#### *Odour*

The AQIAR predicted that odour concentrations comply with the established criterion and that peak odour emissions from the project site would not be detectable to any sensitive receptors. The assessment considered that it was foreseeable that a customer may deliver a load which contains some putrescible waste, and that it would spend a small amount of time on site before it is rejected and removed.

CRRRF has advised that in practice, if putrescible waste is inadvertently received at the facility, it would be removed promptly. The site inspection indicated that:

- No putrescible waste was present on the site.
- No odour was detected from the receivals or other areas of the site.
- CRRRF has not received any odour complaints.

Therefore, odour impacts from the facility to the surrounding receivers was *likely* to be negligible, and consistent with the predictions of the EIS and the Approval.

### **3.4.4 Stormwater, leachate and fire water systems**

#### *Leachate and fire water*

The leachate and fire water systems from the process building have been constructed in accordance with the requirements of the Approval. The fire system was certified by the independent certifier that the requirements of the FRNSW have been incorporated into the design and constructed accordingly.

Notwithstanding the capacity of the system to isolate contaminated leachate or fire waste from the stormwater system, no leachate has been generated at the facility due to the strict controls in place on incoming waste.

CRRRF advised that whilst FRNSW attended a number of fires at the premises, no fire leachate water was generated.

Based on the information provided as part of this audit, the leachate and fire water systems were constructed consistently with the requirements of the EIS and RTS.

#### *Stormwater system*

The stormwater system was certified by an independent certifier to be constructed in accordance with the requirements of the Approval.

The stormwater system has designated "clean" and "dirty" areas. Stormwater pits in the dirty areas contained Drain Wardens which prevent debris from entering the system. Further, drains from the dirty areas report to a series of treatment devices before discharging off site.

Site observations confirmed that:

- A street sweeper is deployed to maintain all external hardstand areas. CRRRF advised that the street sweeper comes in every afternoon during the week.

- Entry to the stormwater drains were labelled and were free of litter and debris build-up
- The truck wash was operational, minimising potential tracking of mud or debris from the site. There was no evidence of tracking from the site.

The stormwater system is maintained on an ongoing basis by a third party in accordance with the Water Management Plan. Service maintenance reports were sighted.

This audit has concluded that the stormwater system at the facility was being managed in accordance with the predictions of the EIS and the requirements of the Approval.

#### *Surface water monitoring*

CRRRF has undertaken surface water quality monitoring since 2018 however the records were inconsistently maintained. This audit was not able to determine whether key elements of the operational surface water monitoring program were implemented.

Further, CRRRF advised that the operational surface monitoring program outlined within the Water Management Plan did not provide clear direction to site personnel on what was required. CRRRF advised that they were seeking specialist advice on a review of the operational surface water monitoring requirements for the site.

*Refer to Recommendation 2022 R-02 in Section 4.1 of this report.*

#### *Recommendation:*

### **3.5 Summary of compliance against assessable documents**

An assessment of compliance was undertaken for each of the assessable documents and a summary of the compliance status for each document is presented in Table 5. Compliance was assessed using the compliance status descriptors in Section 2.3 of this report.

*Table 5 Summary of compliance*

<b>Document</b>	<b>Compliant</b>	<b>Non-compliant</b>	<b>Not triggered</b>
Project Approval SSD 7256	28	12	7
EPL No 20937	29	6	8
OEMP and associated sub-plans	29	3	3
<i>Total</i>	<i>86</i>	<i>21</i>	<i>18</i>

In total, twenty-one non-compliances were awarded by the audit however numerous requirements are repeated between assessable documents. Where this occurs, the non-conformance is raised for each document and the discussion surrounding that non-conformance is referred to the primary instrument for this audit (the Approval).

The detailed assessment against each of these documents is provided in Appendix A, Tables A1 to A3. A summary of compliance against each of the assessable documents is provided in the following sub-sections.

### 3.6 Project Approval

CRRRF demonstrated a high level of compliance against the Project Approval SSD 7256 conditions, as applicable during the reporting period. An overview of compliance is summarised below:

- The facility is operating within its limit of consent and has maintained an EPL with the EPA.
- Waste screening and acceptance, waste disposal and waste monitoring were consistent with the Approval
- Pest, vermin and noxious weed management have been effectively managed
- The stormwater management system was operated in accordance with the Water Management Plan
- Operational noise was being managed to have minimal impact to neighboring industrial sites and sensitive residential receivers
- Traffic impacts including tracking from the site, parking and access and egress from the site, were consistent with the Approval
- Dangerous goods management was consistent with the Approval
- There have been no complaints or off-site environmental impacts attributable to stormwater discharges, noise, odour or traffic. One complaint was recorded for dust.
- The facility was implementing, to a high degree, the Operational Environmental Management Plan (OEMP) and associated sub plans
- The facility has commissioned this independent audit.

Detailed compliance findings are provided in Appendix A, Table A1.

Twelve non-compliances were recorded against the Approval. A summary of the non-compliances (by exception) against the Approval is provided in Table 6.

*Table 6 Non-compliances identified with the Approval*

Condition	Requirement	Audit finding
A1	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the development.	<b>Implement all reasonable and feasible measures</b>  Refer to conditions B2, B3 and B32 below.
A2	The Applicant, in acting on this consent, must carry out the development in accordance with the: (a) Development Application (SSD 7256);	<b>Non-compliances</b>  CRRRF has been awarded a number of non-compliances across the audit period against the Development Application as described below.
A4	The Applicant must comply with all written requirement(s) of the Planning Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent;	<b>Comply with all written requirement(s)</b>  CRRRF had not addressed the 14 matters identified the in 2019 IEA Action Plan, by the due date.
B2	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	<b>Waste storage</b>  EPA issued a Prevention Notice documenting observations including: <ul style="list-style-type: none"> <li>• Unprocessed waste stockpiled inside the process shed but outside of designated areas</li> <li>• Waste spilling outside of the process shed.</li> </ul>

Condition	Requirement	Audit finding
		This noncompliance has been rectified.
B3	All processed and unprocessed waste must be stored within the building on the site. Processed, wrapped and baled PEF may be stored in the area designated on the approved plans in Appendix 1 for the outdoor storage of PEF.	<b>Waste storage</b> EPA observed mixed waste batteries stored uncovered, outside the building in a metal skip bin on the concrete forecourt to the west of the processing shed. This noncompliance has been rectified.
B23	The Applicant shall ensure the Water Management Plan (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development	<b>Surface water monitoring</b> Surface water monitoring was ongoing however record keeping was ad hoc, and it could not be determined whether the key elements of the monitoring program had been satisfied.
B32	The Applicant must implement all reasonable and feasible measures to minimise dust generated during demolition, earthworks, construction and operation of the development.	<b>Dust Management</b> EPA issued a Prevention Notice documenting observations including: <ul style="list-style-type: none"> <li>Dusty and hazy conditions coming from the premises</li> <li>An accumulation of fine dust on horizontal surfaces in the process shed, 15 cm thick in some areas.</li> </ul> This noncompliance has been rectified.
B46	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by Condition B45 for the life of the development.	<b>Landscaping</b> The landscape management plan specifies a thin strip along the western boundary of the site to be landscaped with nominated shrubs. The shrubs were not planted.
C7	Within three months of: <ul style="list-style-type: none"> <li>(a) approval of a modification;</li> <li>(b) approval of an annual review under Condition C8;</li> <li>(c) submission of an incident report under Condition C1; or</li> <li>(d) completion of an audit under Condition C12,</li> </ul> the Applicant must review, and if necessary, revise, the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.	<b>Review of plans</b> The OEMP and sub-plans had not been reviewed and updated since the 2019 IEA report.
C8	Each year, the Applicant must review the environmental performance of the development to the satisfaction of the Planning Secretary. This review must: ...	<b>Annual reviews</b> Annual reviews for the purpose of satisfying Condition C8 had not been undertaken.
C12	Within six months of the commencement of operation, and every three years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:	<b>Timing of the audit</b> This IEA was due to be conducted three years thereafter for the period 1 February 2019 to 31 January 2022, however it was not commissioned until 29 July 2022, approximately 6 months late.
C14	The Applicant must make copies of the following publicly available on its website:	<b>Access to information</b> Not all information required by Condition C14 was made publicly available via the Project's webpage.



### 3.7 Environment Protection Licence

CRRRF demonstrated a high level of compliance against the EPL conditions, as applicable during the reporting period. Detailed findings are provided in Appendix A, Table A2.

Six (6) non-compliances were recorded against the EPL. A summary of the non-compliances (by exception) against the EPL is provided in Table 7.

*Table 7 Non-compliances identified with the EPL*

Condition	Requirement	Audit finding
L2.3	All processed and unprocessed waste must be stored within the building. Processed, wrapped and baled PEF may be stored outside in the designated area to the south of the baler (As marked by the grid in the site plan of Appendix A of "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623)).	<b>Waste Storage</b> Refer to Consent Conditions B2 and B3.
O1.1	Licensed activities must be carried out in a competent manner. This includes: (a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity	<b>Waste Storage</b> EPA issued a Prevention Notice concluded the waste stockpiled at the Premises is not stored in a competent manner in accordance with condition O1.1 of the Licence.
O3.1	Activities occurring in or on the Premises must be carried out in a manner that prevents or minimises the generation of dust.	<b>Dust Management</b> Refer to Consent Conditions B32.
O3.2	The Premises must be maintained in a condition which prevents or minimises the emission of dust from the Premises.	<b>Dust Management</b> Refer to Consent Conditions B32.
O3.3	The licensee must ensure no visible dust leaves the Premises.	<b>Dust Management</b> Refer to Consent Conditions B32.
O5.2	By no later than 5 October 2018, the Applicant must engage a suitably qualified person to undertake an audit of the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623). A report detailing the outcomes of the audit must be submitted to the EPA by no later than 7 December 2018.	<b>OEMP audit</b> An audit against the CRRRF Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623) was not undertaken.

### 3.8 OEMP and associated sub-plans

CRRRF demonstrated a high level of compliance against the OEMP and associated sub-plans. Detailed findings are provided in Appendix A, Table A3.

Three (3) non-compliances were recorded against the OEMP and associated sub-plans. A summary of the non-compliances (by exception) against the OEMP and associated sub-plans is provided in Table 8.

Table 8 Non-compliances identified with the OEMP and associated sub-plans

Section	Requirement	Audit finding
OEMP Section 9.11	Landscape management <ul style="list-style-type: none"> <li>Install and maintain the landscaping of the site in accordance with the Landscape Management Plan (Appendix O)</li> </ul>	<b>Landscaping</b> Refer to Consent Conditions B466.
WMP Section 3.4.1	Ongoing operations stage <ul style="list-style-type: none"> <li>Upstream and site discharge monitoring, Site Sampling Trigger is activated at Upstream location with a maximum of one sampling event very six months</li> </ul>	<b>Surface water monitoring</b> Refer to Consent Conditions B23
EfWMP Section 4	Calculation of percentages Formula: $\text{PEF \%} \leq (100\% \times \text{C\&D recycling residuals}) + (100\% \times \text{"no limit mixed C\&I" waste}) + (50\% \times \text{"50\% mixed C\&I" waste}) + (25\% \times \text{mixed C\&D waste})$	<b>PEF% calculation method</b> The calculation method for PEF% in the EfWMP has not been updated with the EPA approved method.

### 3.9 Incidents and complaints

CRRRF maintains a register of incidents and complaints using a software package called SkyTrust. For the audit period:

- One complaint was recorded on 15/10/20 relating to dust, by an employee of a neighboring industrial property.
- No other environmental incidents were recorded.

### 3.10 Status of the 2019 IEA Action Plan

The 2019 IEA Action Plan identified fourteen (14) corrective actions and nine (9) improvement opportunities.

This audit assessed the CRRRF response to the 2019 IEA Action Plan. This audit determined that:

- Nine (9) of the fourteen (14) recommendations were closed out during the reporting period. Five (5) recommendations have been carried forward to Section 4.1 of this report.
- Four (4) of the nine (9) improvement opportunities were closed out during the reporting period. Five (5) improvement opportunities have been carried forward to Section 4.2 of this report.

A summary of this assessment is presented in Appendix E of this report.

### 3.11 Adequacy of the management plans

#### *Conformance with the approval*

The 2019 IEA determined that the OEMP had been prepared in accordance with Approval conditions C4 and C6 and the associated sub-plans have been prepared in accordance with Approval conditions B8, B21, B22, and B34. The plans were submitted to DPE on 17 November 2017, prior to commencement of operation in June 2018. The plans were approved by DPE on 17 March 2018.

The 2019 IEA review of the plans confirmed full compliance with the approval conditions however several opportunities for improvement were identified.

The improvement opportunities were addressed under 2019 IO-06 and 2019 IO-07 however the plans were not reviewed during the audit period hence the improvement opportunities were not addressed.

*Improvement opportunities 2019 IO-06 and 2019 IO-07 remain open. Refer to Section 4.2 of this report.*

#### *Maintenance of plant and equipment*

The 2019 IEA identified high order strategies in the OEMP including:

- Maintain dust suppression and extraction equipment at major dust generation points in the process
- Maintain the dust suppression sprays at key process locations, including conveyors of the processing plant and stockpile sprinklers
- Maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired
- Assess noise emissions and implement actions to ensure compliance with the relevant conditions of the Development Consent.
- Maintenance of machinery, plant and equipment – as required

The OEMP does not provide guidance to CRRRF personnel on which plant and equipment must be maintained and monitored for the facility to meet its environmental obligations.

The OEMP should identify (or reference documents which identify) critical plant and equipment and for each item, specify:

- An inspection regime to monitor its performance / effectiveness
- Maintenance requirements to ensure CRRRF meets its environmental obligations.

Critical plant and equipment may include apparatus to control dust, noise and stormwater treatment.

*Improvement opportunity 2019 IO-09 was raised in the previous audit however the plans were not reviewed during the audit period hence the improvement opportunity was not addressed.*

*Improvement Opportunity 2019 IO-09 remains open. Refer to Section 4.2 of this report.*

### **3.12 Site inspection**

A site inspection of the site was undertaken on 26 August 2022. A photographic record of the site inspections is provided in Appendix F of the report.

## 4 Recommendations

Recommendations to address non-compliances and opportunities for improvement identified during this audit are presented in Tables 10 and 11 respectively. In accordance with Condition C13 of the Approval, CRRRF is required to submit a response to any recommendations contained in the audit report.

For each recommendation and improvement opportunity, reference is made to the relevant section in the report or compliance tables where the non-compliance was raised.

### 4.1 Recommendations to address non-compliance

Recommendations to address non-compliance have been identified where the report has determined that CRRRF has not met a substantive requirement and corrective action is required to address the non-compliance.

A total of nine (9) recommendations have been presented in Table 9, including five (4) recommendations that were not closed out, originating from the previous audit (prefixed with 2019 R-XX).

*Table 9 Recommendations to address non-compliance*

R - #	Reference	Recommendation
<b>2022 R-01</b>	Section 3.4.1 Table A1 Condition B32	<b>Updating the AQMP</b> Update the Air Quality Management Plan to document: <ul style="list-style-type: none"> <li>the additional reasonable and feasible dust controls implemented by CRRRF</li> <li>environmental air monitoring processes</li> <li>environmental air monitoring performance targets</li> <li>record keeping.</li> </ul>
<b>2022 R-02</b>	Section 3.4.4 Table A1 Condition B23 Table A3, WMP Section 3.4	<b>Surface water monitoring</b> Review and update the Water Management Plan to document a feasible operational surface water monitoring program including triggers for monitoring, monitoring locations, record keeping, reporting and quality control.
<b>2022 R-03</b>	Table A1 Condition C7	<b>Revision of Strategies, Plans and Programs</b> Review and revise the OEMP and supporting management plans to address the findings of this audit, as per Condition C7 of the Approval.
<b>2022 R-04</b>	Table A1 Condition C8	<b>Annual Review</b> Undertake annual reviews of the CRRRF performance, as per Condition C8 of the Approval. To align the annual reviews with the audit program, the first annual review should be for the period of 1 July 2022 to 30 June 2022, unless instructed otherwise by DPE.
<b>2022 R-05</b>	Table A1 Condition C14 Appendix E	<b>Web-page information</b> Ensure all information required by Condition C14 is publicly available on the facility's webpage.
<b>2019 R-08</b>	Table A1 Condition B46 Appendix E	<b>Landscaping</b> Provide landscaping to the site as specified in the Landscape Management Plan (LMP). Where this is not feasible, provide an alternate LMP and seek approval from the Department of Planning.
<b>2019 R-10</b>	Appendix E	<b>Audit report to the EPA</b>



R - #	Reference	Recommendation
		Liaise with the EPA for a revised date for submission of an audit report detailing the outcomes of an OEMP audit.
2019 R-12	Appendix E	<b>Quackers</b> Consider the incorporation of the following noise control into the OEMP, as specified in the statement of commitments: <ul style="list-style-type: none"> <li>Plant based at the site will be fitted with "quacker" style reversing alarms.</li> </ul>
2019 R-14	Appendix E	<b>EfWMP Calculation</b> Update the EfW calculation method in the EfWMP, so it is consistent with the calculation method approved by the EPA.

## 4.2 Opportunities for improvement

Opportunities for improvement have been identified where CRRRF has substantively met the relevant requirement however an opportunity to improve the performance of CRRRF has been identified by the auditor.

A total of eight (8) improvement opportunities are presented in Table 11, including five (5) improvement opportunities that were not closed out, originating from the previous audit (prefixed with 2019 IO-XX).

Table 10 Improvement opportunities

IO - #	Reference	Recommendation
2022 IO-01	Section 3.2.3	<b>Occupation certificate</b> Provide to Fairfield City Council (FCC) an occupation certificate for the building works approved as part of construction certificate 16/1688/04, issued by Steve Watson & Partners on 29 May 2018. <b>CLOSED</b> - Prior to completion of this report, CRRRF submitted the occupation certificate to FCC. An email was sighted from the FCC Senior Building Surveyor – Compliance/Fire Safety confirming receipt of the certificate.
2022 IO-02	Section 3.4.1 Table A1 Condition B32	<b>Environmental Air Quality Monitoring</b> Consider replacing the dust deposition gauges with real-time dust monitoring for a period of 12 months, or until it can be determined that the facility's contribution to local environmental dust is effectively managed.
2022 IO-03	Table A3 OEMP Section 5.3	<b>Site-specific Environmental Inductions</b> The Environmental awareness package would benefit from a site-specific slide which addresses key EPA concerns and environmental issues and controls such as dust, noise, stormwater, and waste management.
2019 IO-02	Appendix E	<b>Customer records - incoming waste</b> Maintain a controlled register of all pre-qualified incoming customers including pertinent information such legal entity (ABN/ACN number) and waste facility licence number.
2019 IO-04	Table A1 Condition B10 Appendix E	<b>Waste Monitoring Program</b> Establish a document that collates all the requirements of the Condition B10 into one concise "Waste Monitoring Program" as a reference for personnel responsible for the monitoring of incoming and outgoing wastes.
2019 IO-06	Appendix E	<b>Update the OEMP</b> Revise the OEMP to include: <ul style="list-style-type: none"> <li>Explicit environmental responsibilities and authorities for key CRRRF personnel</li> <li>Procedures to inform the local community of CRRRF operations, as required.</li> </ul>

IO - #	Reference	Recommendation
		<ul style="list-style-type: none"> <li>Consistency in documentation regarding commitment to notify of DPE, in the event of an environmental incident or emergency.</li> <li>The record keeping requirements of the EPL (Condition M1.2 and M1.3) should be referenced in the OEMP.</li> <li>In its objectives, include: <ul style="list-style-type: none"> <li>A commitment to new technologies through-out the life of the plant.</li> <li>Extent to which it encourages and facilitates community participation in the recycling of building and construction waste.</li> </ul> </li> <li>Reference to AS 3833:2007 The storage and handling of mixed classes of dangerous goods, in packages and intermediate bulk containers, and the NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants handbook</li> <li>Improved guidance on how primary legislation referenced in the OEMP applies to operations</li> </ul>
2019 IO-07	Appendix E	<p><b>Legislation</b></p> <p>The following Sections of the Protection of the Environment Operations Act 1997 and their obligations should be referenced in the OEMP:</p> <ul style="list-style-type: none"> <li>Section 120 - Pollution of waters</li> <li>Section 129 – Potentially offensive odour</li> </ul>
2019 IO-09	Table A1, Condition A23 Appendix E	<p><b>Maintenance of plant and equipment</b></p> <p>The OEMP should identify (or reference documents which identify) critical plant and equipment and for each item, specify:</p> <ul style="list-style-type: none"> <li>An inspection regime to monitor its performance / effectiveness</li> <li>Maintenance requirements to ensure CRRRF meets its environmental obligations.</li> <li>Critical plant and equipment may include apparatus to control dust, noise and stormwater treatment.</li> </ul>

# Appendix A – Independent audit tables

## Appendix A: Table A1 - SSD 7256 Compliance Table

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
<b>PART A ADMINISTRATIVE CONDITIONS</b>				
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>				
A1	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the development.		<p>During the audit period, CRRRF attracted the attention of Council, NSWFB and the EPA. Records of correspondence from the EPA documented that reasonable and feasible measures were not implemented for waste and dust management, leading to potential fire hazard. These are discussed in Table A1 Conditions B2, B3 and B32.</p> <p><u>On this basis, a non-compliance has been awarded for this condition.</u></p> <p>It is noted however that at the time of preparing this report, CRRRF demonstrated it was implementing all reasonable and feasible measures to prevent and/or minimise any harm to the environment associated with waste management and dust management, as described in Table A1 Conditions B2, B3 and B32.</p>	<b>Non-compliant</b>
<b>TERMS OF CONSENT</b>				
A2	<p>The Applicant, in acting on this consent, must carry out the development in accordance with the:</p> <ul style="list-style-type: none"> <li>(a) Development Application (SSD 7256);</li> <li>(b) EIS;</li> <li>(c) RTS;</li> <li>(d) conditions in Schedule 2;</li> <li>(e) Modification Assessments</li> <li>(f) development layout plans and drawings listed at Appendix 1; and</li> <li>(g) the Management and Mitigation Measures as identified in Appendix 2.</li> </ul>		<p>CRRRF has been awarded a number of non-compliances across the audit period against the Development Application (Table A1).</p> <p>Refer to Table A1 for further detail.</p>	<b>Non-compliant</b>

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
A3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.		No inconsistencies were identified.	Not triggered
A4	<p>The Applicant must comply with all written requirement(s) of the Planning Secretary arising from the Department's assessment of:</p> <ul style="list-style-type: none"> <li>(a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent;</li> <li>(b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the consent; and</li> <li>(c) the implementation of any actions or measures contained in these documents.</li> </ul>	DPE letter to CRRRF dated 25 November 2019	<p>Records of correspondence with DPE during the audit period were not available at the time of the audit. Therefore, the auditor sought records from DPE.</p> <p>In a DPE letter to CRRRF dated 25 November 2019, DPE noted that CRRRF had not addressed the 14 matters identified in the 2019 IEA action plan, by the due date, and requested that a response be provided by a revised due date. No further correspondence records were available from the CRRRF or DPE.</p> <p><u>Based on the information available, a non-compliance has been issued for this condition.</u></p> <p><b>Recommendation:</b> No additional actions have been identified to address this non-compliance as outstanding actions from the 2019 IEA have been incorporated into the findings of this audit.</p>	<b>Non-compliant</b>
<b>LIMITS OF CONSENT</b>				
A5	<i>This consent lapses five years after the date from which it operates, unless the development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EP&amp;A Act.</i>		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	
A6	The Applicant must not receive or process on the site more than 250,000 tonnes per annum (tpa) of waste, as defined in this consent.	<p>http: WARRP.epa.nsw.gov.au/pages/dashboard</p> <p>WARRP Report May 2022</p> <p>WARRP Report October 2021</p> <p>WARRP Report March 2020</p> <p>Total annual tonnes summary sheet</p>	<p>A random sample of WARRP reports submitted to the EPA were sighted on the EPA portal. It was determined that for the nominated month the following information is reported:</p> <ul style="list-style-type: none"> <li>• total quantity received by waste type</li> <li>• total quantity processed</li> <li>• total quantity of waste transported from site for disposal and recovery and the receiving facility</li> <li>• summary stocktake for the month (must not exceed authorised amount of 7000 tonnes)</li> </ul> <p>A summary of annual tonnages received to the site were provided by CRRRF as follows:</p> <ul style="list-style-type: none"> <li>• July 19 to June 2020 – 49,730 tonnes</li> </ul>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
			<ul style="list-style-type: none"> <li>July 20 to June 2021 – 69,661 tonnes</li> <li>July 21 to June 2020 – 69,232 tonnes</li> </ul> <p>A comparison of monthly quantities between the WARRP reports and the CRRRF summary sheet indicated minor variance. CRRRF advised that the variance is due to the WARRP reports having actual tons that come into the facility over the weighbridge. The financial reported figure, however, has an adjusted figure based on credits or debits to customers depending on rejected loads due to quality, etc.</p> <p>Notwithstanding, the total annual tonnages were well below the 250,000 tpa.</p>	
A7	Incoming waste must only be transported to the site in trucks from pre-qualified customers delivering targeted waste streams, in line with Table 1 of the NSW Energy from Waste Policy Statement.	Waste acceptance criteria	<p>The weigh bridge only accepts waste from customers with accounts. To obtain an account, the customers must be prequalified.</p> <p>A sample of truck movements during the site inspection confirmed that deliveries were accepted to the site from prequalified customers, including the following random sample:</p> <ul style="list-style-type: none"> <li>C40042 Veolia Environmental Services</li> <li>C40082 Sell and Parker</li> <li>C40036 Shred X</li> <li>C40076 Cobra Bins</li> <li>C40096 ACCC Thailand</li> </ul> <p>CRRRF provided a sample of the Waste acceptance criteria which is provided to each prequalified customer.</p>	Compliant
<b>STAGED SUBMISSION OF PLANS OR PROGRAMS</b>				
A8	<p>With the approval of the Planning Secretary, the Applicant may:</p> <p>(a) submit any strategy, plan or program required by this consent on a progressive basis; and/or</p> <p>(b) combine any strategy, plan or program required by this consent.</p>		<i>This requirement was not triggered during this audit period.</i>	
A9	<i>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy,</i>		<i>This requirement was not triggered during this audit period.</i>	



Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
<i>plan or program. A clear relationship between the strategy, plan or program that is to be combined must be demonstrated.</i>				
EVIDENCE OF CONSULTATION				
A10	<p>Where consultation with any public authority is required by the conditions of this consent, the Applicant must:</p> <p>(a) consult with the relevant public authority prior to submitting the required documentation to the Planning Secretary or the PCA for approval, where required;</p> <p>(b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and</p> <p>(c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this development consent.</p>		<p>This requirement was deemed “compliant” by the 2019 IEA.</p>	
DISPUTE RESOLUTION				
A11	<p>In the event that a dispute arises between the Applicant and Council or a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's determination of any such dispute shall be final and binding on the parties.</p>		<p>There have been no disputes between CRRRF and Council or a public authority.</p> <p>It is noted that CRRRF was the subject of regulatory action by the EPA as detailed in Section 3.3 of the Report. Neither party referred the matters to DPE for resolution.</p>	<p>Not triggered</p>
STATUTORY REQUIREMENTS				
A12.	<p>The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.</p>	<p>EPA Environmental Protection Licence (EPL) No. 20937, 25 January 2021</p>	<p>The Environment Protection Licence has been progressively updated over the reporting period.</p> <p>Refer to section 3.3 of the Report for a summary of Notice of Variation of Licence</p>	<p>Compliant</p>
DEMOLITION				
A13.	<p>The Applicant must ensure that all demolition associated with the development is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version and the requirements of the Work Health and Safety Regulation, 2011.</p>		<p>Demolition – Beyond the scope of this audit.</p>	

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
<b>STRUCTURAL ADEQUACY AND CERTIFICATION</b>				
A14	The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA.		<i>This requirement was deemed “compliant” by the 2019 IEA.</i>	
A15	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 NSW and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of Volume One of the <i>National Construction Code (NCC) Series</i> .		<i>This requirement was deemed “compliant” by the 2019 IEA.</i>	
A16	Prior to the issue of a Construction Certificate for a building or structure, a Construction Certificate (Engineering Approval) must be submitted to the Certifying Authority for the construction of a new inlet pit and alteration of an existing pit and the connection of the drainage pipe into the existing stormwater drainage pipe within the easement, laybacks, access driveways and replacement of damaged footpaths, in accordance with approved plans.		<i>This requirement was deemed “compliant” by the 2019 IEA.</i>	
A17	Prior to the construction of any utility works associated with the development, the Applicant must obtain the relevant approvals from service providers.		Construction – Beyond the scope of this audit	
A18	Prior to the commencement of operation, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.		<i>This requirement was deemed “compliant” by the 2019 IEA.</i>	
A19	Prior to the issue of the Final Occupation Certificate, adjustments to any public utilities necessitated by the development are to be completed in accordance with the requirements of the relevant Authority. Any utility costs are to be at no cost to Council.		<i>This requirement was deemed “not triggered” by the 2019 IEA.</i>	
<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>				
A20	Prior to the commencement of earthworks, the Applicant must: ...		Construction – Beyond the scope of this audit	
A21	The Applicant must: (a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the development; and		Construction – Beyond the scope of this audit	

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.			
<b>DEVELOPMENT CONTRIBUTIONS</b>				
A22	<p>Prior to the issue of a Construction Certificate for any part of the development, the Applicant must pay \$241,930 to Council in accordance with the Fairfield City Council Indirect (Section 94A) Development Contributions Plan 2011.</p> <p><i>Note: The contribution amount payable may be adjusted at the date of payment. Any unpaid contributions will be adjusted on a quarterly basis to account for movements in the Australian Bureau of Statistics, Producer Price Index - Building Construction (New South Wales).</i></p>		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	
<b>OPERATION OF PLANT AND EQUIPMENT</b>				
A23	<p>The Applicant must ensure that all plant and equipment used for the development is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	MEX overview with Maintenance Manager	<p>CRRRF schedules and maintains its plant and equipment using MEX. The Maintenance Manager uses MEX to schedule maintenance as per manufacturers requirements. Work orders are established and allocated to maintenance personnel. Maintenance records are recorded in MEX.</p> <p>Site observations confirmed:</p> <ul style="list-style-type: none"> <li>Waste receivals was effectively managed within the waste receivals area. The area was ordered and effectively controlled.</li> <li>Wastes streams were effectively maintained in designated areas and stockpiles</li> <li>Waste processing was operational at the time of the audit.</li> <li>Site landscaping was well maintained.</li> <li>A program was in place to service and maintain the pollution controls within the stormwater system (refer to Table A1, Condition B16)</li> </ul> <p><u>On this basis, compliance has been awarded for this condition.</u></p> <p>However, discussions with the Maintenance Manager confirmed that not all plant and equipment critical for ensuring CRRRF meets its environmental obligations was included in the MEX system.</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
<i>Refer to Improvement opportunity 2019 IO-09 in Section 4.2 of this report.</i>				
<b>SURRENDER OF CONSENTS</b>				
A24	In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant must and in the manner prescribed by clause 97 of the EP&A Regulation, surrender all current development consents associated with the site prior to the issue of an Occupation Certificate for the development.		Site personnel were not aware of any development consents that were required to be surrendered.	Not triggered
<b>PART B: ENVIRONMENTAL PERFORMANCE AND MANAGEMENT</b>				
<b>WASTE MANAGEMENT</b>				
<b>Waste Screening and Acceptance</b>				
B1	<p>The Applicant must:</p> <p>(a) implement auditable procedures to:</p> <p>i. screen incoming waste loads;</p> <p>ii. ensure that waste is not accepted at the site that is not permitted by the EPL; and</p> <p>iii. handle and dispose of hazardous waste such as asbestos, sharps and chemical/biological waste that have, despite procedures developed for (ii) above, been received on site.</p> <p>(b) ensure that:</p> <p>i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and</p> <p>ii. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited wastes such as asbestos.</p>	<p>Waste acceptance criteria Revision 3 (June 2019)</p> <p>Standard Operating Procedure (SOP) – Waste Trucks Tipping dated 27/08/21</p> <p>SOP – Managing fibrous cement in incoming material dated 9/3/2021</p> <p>SOP – Using the asbestos gun dated 29/10/2020</p> <p>SOP – Quarantining contaminated materials dated 5/11/2020</p> <p>SOP – Picking from the waste pile dated 6/11/2020</p>	<p>CRRRF issue a customer pre-qualification document prior to its customers first load and after doing an on-site audit of the waste received. After the customers initial loads to the facility, they provide documented feedback of any materials that are not accepted for processing. CRRRF continue to work with its customers to achieve the right material mix.</p> <p>The facility has Standard Operating Procedures to identify and manage unauthorised materials entering the site including:</p> <ul style="list-style-type: none"> <li>Screening incoming wastes during truck tipping</li> <li>Managing fibrous cement in incoming material, including the identification and testing of potential asbestos waste, and its management</li> <li>Quarantining contaminated materials to designated areas</li> <li>Picking unacceptable waste from the waste pile</li> </ul> <p>The SOP for truck tipping makes provisions for a spotter to screen the waste as it is being unloaded to ensure it is not contaminated with unauthorised materials. The waste is kept separate from other waste, so that in the event it is contaminated it can be re-loaded and rejected from the site. There is also provision for floor pickers to scan the waste and remove any residual unacceptable materials.</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
			<p>The facility has an SOP in place to enable floor personnel to positively identify asbestos that may be inadvertently received at the site.</p> <p>Site observations confirmed that the waste-spotter screens and removes wastes such as gas cylinders, batteries and liquid containers.</p>	
<b>Waste Storage and Processing</b>				
B2	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	<p>NSW EPA Prevention Notice 35011381 dated 10/11/21.</p> <p>Site observations</p>	<p>EPA issued a Prevention Notice on 10/11/21 in relation to a report received by the EPA on 2 November 2021 and subsequent observations made by EPA officers on 4 November 2021. In relation to waste management, the Prevention Notice states that on 4 November 2021, the EPA officers observed:</p> <ul style="list-style-type: none"> <li><i>Unprocessed waste within the processing shed was stockpiled against the walls of the shed and obstructed internal walkways used for access and egress (see Photograph 1 and 2). The EPA estimates that the dimensions of waste stockpiled was approximately 85m x 10m x 3m. The waste appeared to consist of mixed waste with large amounts of timber and plastics.</i></li> <li><i>There was no separation or segregation identified within the unprocessed waste stockpile within the processing shed. There was minimal access for emergency services to combat a fire in the event a fire occurred with the waste stockpile.</i></li> <li><i>Waste was observed to be spilling onto the concrete forecourt of the Premises from the partially opened door of the processing shed.</i></li> </ul> <p><u>On this basis, a non-compliance has been awarded for the purposes of this audit.</u></p> <p>Since the observations made by the EPA, CRRRF has:</p> <ul style="list-style-type: none"> <li>removed excess waste from the facility</li> <li>installed bays to store waste within designated areas</li> <li>repaired rapid roller doors to enable them to close down</li> <li>implemented daily checks and reports to confirm waste is stored correctly.</li> </ul>	<b>Non-compliant</b>

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
			<p>Site observations confirmed:</p> <ul style="list-style-type: none"> <li>all wastes were stored within the main building within designated waste bays for waste types</li> <li>whilst there was some litter (PEF) in the areas surrounding the building. There was no evidence of the litter impacting public roads.</li> <li>solid fencing was provided to minimise the likelihood of litter impact to neighbouring properties.</li> </ul> <p><b>Recommendation:</b> This non-compliance was addressed by the NSW EPA Prevention Order 35011381. No further recommendation is made to address this non-compliance.</p>	
B3	All processed and unprocessed waste must be stored within the building on the site. Processed, wrapped and baled PEF may be stored in the area designated on the approved plans in Appendix 1 for the outdoor storage of PEF.	<p>Approved plans in Appendix 1 of SSD 7256</p> <p>Site Inspection</p> <p>EPA email to CRRRF dated 17/6/22</p> <p>Daily Inspection Checklists dated 15/3/22 and 28/07/22.</p>	<p>In an email dated 17/6/22, the EPA advised CRRRF that during an inspection of the premises on 12 May 2022, EPA officers observed mixed waste batteries were being stored uncovered, outside the building in a metal skip bin on the concrete forecourt to the west of the processing shed.</p> <p><u>On this basis, a non-compliance has been awarded for the purposes of this audit.</u></p> <p>Since the observations made by the EPA, the waste has been brought inside the building (Bay C). Daily checks by the HSE Manager monitors these requirements are being implemented. The checks are recorded on the Daily Inspection Checklist. Daily Inspection Checklist includes:</p> <ul style="list-style-type: none"> <li>Dust escape buildings and obvious means</li> <li>Excessive dust in building</li> <li>Waste outside</li> <li>Drains</li> <li>Stockpiles</li> <li>Excessive dust on eaves</li> <li>Housekeeping</li> <li>PEF stockpile</li> <li>General safety walk.</li> <li>Weather station records</li> </ul> <p>Site observations confirmed all wastes were stored within the main building except the PEF as per the consent.</p>	<b>Non-compliant</b>



Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
			<p>The roller doors were functioning and remained closed except for vehicle access/egress.</p> <p><b>Recommendation:</b> No further action was required to address this noncompliance.</p>	
<b>Statutory Requirements</b>				
B4	All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste.	<p>WARRP Report May 2022</p> <p>WARRP Report October 2021</p> <p>WARRP Report March 2020</p> <p>Benedict Recycling EPL #2794</p> <p>Brandowns Landfill EPL #5186</p> <p>Brandowns Resource Recovery EPL #12618</p> <p>Cleanaway Kooragang EPL #6124</p> <p>Eather Group EPL #20733</p> <p>Hi Quality Quarry EPL #20593</p> <p>Hi Quality Transporter Licence #6625</p> <p>Dunmore Recycling and waste Disposal Depot EPL #5984</p>	<p>The WARRP reports summarise all wastes transported from the site. They confirm they are transported to a waste management facility or premises lawfully permitted to accept the waste. They include:</p> <ul style="list-style-type: none"> <li>Waste transported from site for disposal at a licensed waste facility</li> <li>Waste transported from site for lawful recovery at a licensed waste facility</li> <li>Waste transported from site under a Resource Recovery Order</li> <li>Waste transported from site for lawful recovery (not a licensed waste facility)</li> </ul> <p>CRRRF also provided copies of the waste facility licenses for waste facilities licensed to receive nominated wastes.</p>	Compliant
B5.	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal except as expressly permitted by an EPL.		Refer to Table A1 Condition A7	Compliant
B6.	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	<p>WARRP Report May 2022</p> <p>WARRP Report October 2021</p>	The CRRRF weighbridge records all waste received on site and daily records are maintained. The waste records are reported to the EPA on the WARRP monthly reports.	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
		WARRP Report March 2020		
B7.	The Applicant must retain all sampling and waste classification data for the life of the development and keep it readily available for inspection by the EPA and the Planning Secretary.	WARRP Report May 2022 WARRP Report October 2021 WARRP Report March 2020	Waste classification data is recorded on the WARRF monthly reports to the EPA	Compliant
<b>Energy from Waste Management Plan</b>				
B8	<i>Prior to the commencement of operations, the Applicant must prepare an Energy from Waste Management Plan (EfWMP). The EfWMP must:...</i>	<i>Energy from Waste Management Plan, GHD, 27 February 2018, Version 6</i>	<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	
B9	The Applicant shall ensure the Energy from Waste Management Plan (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development.		Refer to Table A1, Condition A7, B6, B7  <i>It is noted that the calculation method for the quarterly reports to the EPA in the EfWMP needs updating. Refer to Table A3 EfWMP Section 4.</i>	Compliant
<b>Waste Monitoring Program</b>				
B10	From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development. 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 on a daily basis the:  i. quantity, type and source of waste received on site; and  ii. quantity, type, quality and destination of the outputs produced on site;  (c) ensure that:  i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and  ii. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste, including asbestos; and	Energy from Waste Management Plan, GHD, 27 February 2018, Version 6	This requirement was deemed "compliant" by the 2019 IEA.  The previous audit also identified that the elements of the monitoring program were not readily relocatable as they were found within the OEMP and the EfWMP. An improvement opportunity was identified in the 2019IEA.  <i>Refer to Improvement Opportunity 2109 IO-4 in Section 4.2 of the report.</i>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	iii. require that all weighbridge data be retained for the life of the development and be made immediately available on request to the Planning Secretary and/or the EPA.			
<b>Construction Waste Management</b>				
B11	<i>Prior to the commencement of construction, the Applicant must prepare a Construction and Demolition Waste Management Plan for the development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by Condition C1 and must: ...</i>		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	
<b>Pests, Vermin and Noxious Weed Management</b>				
B12	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and</li> <li>(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.</li> </ul> <p><b>Note:</b> For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</p>	<p>Bug Stop Industrial Extermination Reports dated 14/10/20 and 6/8/2020</p> <p>Pest control inspection register for Jan-August 2022</p> <p>Site inspection</p>	<p>Bug Stop Industrial Extermination Pty Ltd is engaged to undertake fortnightly inspections of tamper proof rodent stations.</p> <p>The site inspection confirmed the presence of the rodent stations.</p> <p>A cleaner is engaged to do a clean-up of gardens, housekeeping (litter), and weeding.</p>	Compliant
<b>SOILS AND WATER</b>				
<b>Imported Soil</b>				
B13	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site;</li> <li>(b) keep accurate records of the volume and type of fill to be used; and</li> <li>(c) make these records available to the Department upon request.</li> </ul>		Construction – Beyond the scope of this audit	
<b>Erosion and Sediment Control</b>				
B14	Prior to the commencement of earthworks, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the		Construction – Beyond the scope of this audit	

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	Managing Urban Stormwater: <i>Soils and Construction Guideline</i> and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.			
<b>Discharge Limits</b>				
B15	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	<p>NSW EPA Prevention Notice 35011381 dated 10/11/21</p> <p>NSW EPA Penalty Notice 3503002 dated 29 July 2022</p>	<p>EPA issued a Prevention Notice on 10/11/21 in relation to observations made by EPA officers on 4/11/21. In relation to S120 of the POEO Act, the EPA offices observed:</p> <p><i>"Fine black sediment and general waste was flowing into stormwater pits on the Premises Gross pollutant traps installed inside some of the stormwater pits were full of waste. Sediment laden runoff was also flowing down the front entrance of the Premises into stormwater drains on Frank Street."</i></p> <p>The EPA concluded that:</p> <p><i>"Waste and sediment laden water was flowing from the forecourt of the Premises causing or is likely to have caused a pollution incident (water pollution) as defined by the Act and in breach of S120 and S64 of the Act."</i></p> <p>Following the Prevention Notice, CRRRF provided evidence to the EPA that pollution controls within the stormwater system (See Table 1A, Condition B16) would treat any stormwater entering the system before it is discharged, thereby not causing pollution.</p> <p><u>It was concluded by this audit therefore, that there was insufficient evidence to verify pollution of waters.</u></p> <p>It was further noted that on 27 July 2022, the EPA issued a penalty notice for observations made on 4/11/21. The penalty notice did not include a penalty associated with pollution of waters.</p>	Compliant
<b>Stormwater Management System</b>				
B16	<p>The Applicant must design, install and operate a stormwater management system for the development. The system must:</p> <p>(a) ensure the system is designed by a suitably qualified and experienced person(s), generally in accordance with the</p>	<p>Enspire, Stormwater quality Assessment Report dated 28 April 2020</p>	<p><b>Design and installation</b></p> <p>A compliance assessment of the stormwater system was undertaken by Enspire. The assessment concluded that the system was consistent with the requirements of Council, EPA, DA consent, OEMP and WMP.</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	<p>conceptual design in the EIS and applicable Australian Standards and in consultation with Council;</p> <p>(b) ensure that the system capacity has been designed in accordance with <i>Managing Urban Stormwater- Soils and Construction</i> Vol. 1 (Landcom, 2004);</p> <p>(c) divert existing clean surface water around operational areas of the site;</p> <p>(d) direct all sediment laden water in overland flow away from the leachate management system; and</p> <p>(e) prevent cross-contamination of clean and sediment or leachate laden water.</p>	<p><i>Water Management Plan</i>, GHD, 9 March 2018, Version 3.</p> <p>Resource email correspondence with Ocean Protect from 2/2/22 to 15/6/22.</p> <p>Ocean Protect, OceanGuard Operations and Maintenance Manual updated March 2019</p> <p>Ocean Protect, StormFilter Operations and Maintenance Manual updated March 2019</p> <p>Ocean Protect, Service records for Storm Filter and Ocean Guard maintenance dated</p> <ul style="list-style-type: none"> <li>• May 2021,</li> <li>• September 2021,</li> <li>• February 2022,</li> <li>• May 2022.</li> </ul>	<p><b>Operation:</b></p> <p>The stormwater pollution controls (storm filter and ocean guards) had been maintained in accordance with the OEMP (on a three times per year basis). Service maintenance reports were sighted for May 2021 to May 2022.</p> <p>Site observations confirmed that:</p> <ul style="list-style-type: none"> <li>• A street sweeper is deployed to maintain all external hardstand areas. CRRF advised that the street sweeper comes in every afternoon during the week.</li> <li>• Entry to the stormwater drains were labelled and were free of litter and debris build-up.</li> <li>• The truck wash was operational, minimising potential wheel tracking of mud or debris from the site. There was no evidence of wheel tracking from the site.</li> </ul>	Compliant
B17	<i>Prior to the issue of a Construction Certificate, a certificate must be submitted to the Certifying Authority certifying that:...</i>		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	
B18	<i>Prior to the issue of the Final Occupation Certificate, Works-As-Executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved must be submitted to the Certifying Authority.</i>		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	
B19	<p><i>The stormwater drainage generated from the development must be directed to:</i></p> <p>(a) <i>the drainage easement; and</i></p> <p>(b) <i>Council's street kerb and gutter.</i></p>		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
B20	All stormwater drains/pits on the site must be provided and maintained with the message; "This pit drains to the Georges River". Lettering must be 100mm high block bold yellow painted lettering. Paints used must be of road line marking standard.	Site inspection	Stormwater drains/pits on the site were labelled with the message; "This pit drains to the Georges River" with 100mm high yellow lettering.  CRRRF advised that these signs will be refreshed as they are beginning to wear in trafficable areas.	Compliant
<b>Leachate Management Plan</b>				
B21	Prior to the commencement of operation, the Applicant must prepare a Leachate Management Plan for the management of leachate and firewater at the site, including any possible leachate generated around the baling and wrapping area. The leachate system must: ...		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	
<b>Water Management Plan</b>				
B22	Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must:...		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	
B23	The Applicant shall ensure the Water Management Plan (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development.		The key requirements of the plan relate to system design and installation, ongoing monitoring of performance and reporting. These key elements of the plan in relation to installation and operation have been implemented. Refer to Table A3 (Water Management Plan)  Surface water monitoring was ongoing however record keeping was ad hoc, and it could not be determined whether the key elements of the monitoring program had been satisfied. Refer to Table A3, Section 3.4.1.  <b>Refer to Recommendation 2022 R-02 in Section 4.1 of the report.</b>	<b>Non-compliant</b>
<b>NOISE</b>				
<b>Construction and Operation Hours</b>				



Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status												
B24	<p>The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary.</p> <p><b>Table 1: Hours of Work</b></p> <table><tr><th>Activity</th><th>Day</th><th>Time</th></tr><tr><td>Earthworks and construction</td><td>Monday-Friday</td><td>7am-6pm</td></tr><tr><td></td><td>Saturday</td><td>8am-1pm</td></tr><tr><td>Operation</td><td>Monday-Sunday</td><td>24 hours</td></tr></table>	Activity	Day	Time	Earthworks and construction	Monday-Friday	7am-6pm		Saturday	8am-1pm	Operation	Monday-Sunday	24 hours		Operations is permitted 7 days per week, 24 hours per day.	Compliant
Activity	Day	Time														
Earthworks and construction	Monday-Friday	7am-6pm														
	Saturday	8am-1pm														
Operation	Monday-Sunday	24 hours														
B25	<p>Works outside of the hours identified in Condition B24 may be undertaken in the following circumstances:</p> <ul style="list-style-type: none"><li>(a) works that are inaudible at the nearest sensitive receivers;</li><li>(b) works agreed to in writing by the Planning Secretary;</li><li>(c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or</li><li>(d) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.</li></ul>		This requirement was not triggered during the audit period.	Not triggered												
Construction Noise Limits																
B26	<p>The development must be constructed to achieve the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (Department of Environment and Climate Change, 2009)...</p> <p>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 EIS.</p>		Construction – Beyond the scope of the audit													
Construction Noise Management																
B27	<p>Prior to the commencement of construction, the Applicant must consult with neighbouring properties regarding the scheduling of high noise generating construction works such as excavation and bulk earth works. The Applicant must provide to the Department with the results of such consultation before construction commences.</p>		Pre construction – Beyond the scope of the audit													
Operational Noise Limits																

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status																						
B28	<p>The Applicant must ensure that noise generated by the operation of the development does not exceed the noise limits in Table 2.</p> <p><b>Table 2: Noise Limits dB(A)</b></p> <table><tr><th>Location</th><th>Day L<sub>Aeq</sub>(15 minute)</th><th>Evening L<sub>Aeq</sub>(15 minute)</th><th>Night L<sub>Aeq</sub>(15 minute)</th><th>Night L<sub>A1</sub>(1 minute)</th></tr><tr><td>All residential receivers</td><td>35</td><td>35</td><td>35</td><td>45</td></tr></table> <p><b>Note:</b> Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.</p> <p><i>OptimE Note: The Wilkinson Murray Report 2019 calculated noise criteria (L<sub>A1</sub>(15minute)) for the development at residential receivers in accordance with the NSW EPA Noise Policy for Industry (NPfI) as follows:</i></p> <ul style="list-style-type: none"><li><i>RES1 – Maugham Crescent:</i><ul style="list-style-type: none"><li><i>Day - 52 L<sub>A1</sub>(15minute)</i></li><li><i>Evening – 43 L<sub>A1</sub>(15minute)</i></li><li><i>Night - 38 L<sub>A1</sub>(15minute)</i></li></ul></li></ul> <p><i>RES1 – Maughan Street is the nearest residential receiver</i></p> <p><i>Therefore, the noise limits set by Condition B28 are considerably more conservative than the EPA Noise Policy for Industry.</i></p>	Location	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)	Night L <sub>A1</sub> (1 minute)	All residential receivers	35	35	35	45	<p>Wilkinson Murray, Baler/Wrapper Noise report dated 9/3/17</p> <p>Safe Environments Quote for Conformity assessment for workplace exposure standards for noise dated 5 August 2021</p> <p>Safe Environments Preliminary occupational hygiene exposure assessment dated 9 August 2021, Report R16825</p> <p>Wilkinson Murray, Noise Impact Assessment Report 15278-N Version C dated May 2016</p> <p>Wilkinson Murray, Extension of Operating Hours 15278-N Version C dated May 2019</p>	<p>An assessment of operational noise from the site was undertaken by Wilkinson Murray in May 2019, specifically for the purpose of changes to the operating hours to 24-hour use of the facility.</p> <p>The table below compares the Condition B28 noise limits, the Wilkinson Murray calculated NPfI Noise emission goal and the Wilkinson Murray Noise Level at receiver RES1 (measured and calculated).</p> <table><tr><th>Period</th><th>Condition B28 &amp; EPL L3.1 Noise Limit L<sub>A1</sub>(15minute)</th><th>NPfI Noise emission goal L<sub>A1</sub>(15minute)</th><th>Wilkinson Murray Noise Level at receiver L<sub>A1</sub>(15minute)</th></tr><tr><td>Day</td><td>35</td><td>52</td><td>51 (Measured)</td></tr><tr><td>Night</td><td>35</td><td>38</td><td>27 (Calculated)</td></tr></table> <p>Wilkinson Murray noted (Page 9) that noise from the facility was inaudible at the location of the RES1 receiver in a 51dB ambient noise environment.</p> <p>Wilkinson Murray concluded (Page 14) that the measured and predicted noise levels indicate compliance with the NPfI criteria at the location of the nearest noise sensitive residential receiver, and noise from 24-hour use of the facility is not expected to have any impacts at the nearest noise sensitive residential receivers.</p> <p>Therefore, whilst the measured noise level at the receiver (51dB) exceeds the noise limit in the Approval and EPL (35dB), there is no evidence that the facility is audible, or contributing to the noise level at the sensitive receiver.</p> <p><u>On this basis compliance has been awarded.</u></p> <p>There have been no complaints related to noise.</p>	Period	Condition B28 & EPL L3.1 Noise Limit L <sub>A1</sub> (15minute)	NPfI Noise emission goal L <sub>A1</sub> (15minute)	Wilkinson Murray Noise Level at receiver L <sub>A1</sub> (15minute)	Day	35	52	51 (Measured)	Night	35	38	27 (Calculated)	Compliant
Location	Day L <sub>Aeq</sub> (15 minute)	Evening L <sub>Aeq</sub> (15 minute)	Night L <sub>Aeq</sub> (15 minute)	Night L <sub>A1</sub> (1 minute)																						
All residential receivers	35	35	35	45																						
Period	Condition B28 & EPL L3.1 Noise Limit L <sub>A1</sub> (15minute)	NPfI Noise emission goal L <sub>A1</sub> (15minute)	Wilkinson Murray Noise Level at receiver L <sub>A1</sub> (15minute)																							
Day	35	52	51 (Measured)																							
Night	35	38	27 (Calculated)																							
Noise Mitigation																										

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
B29	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development;</li> <li>(b) minimise the noise impacts of the development during adverse meteorological conditions;</li> <li>(c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and</li> <li>(d) regularly assess noise emissions and relocated, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.</li> </ul>	Site inspection	<p>During the site inspection and interviews with site personnel, it was confirmed that:</p> <ul style="list-style-type: none"> <li>• All processing occurs within the designated buildings</li> <li>• Roller doors are kept closed at all times except for access and egress of vehicles.</li> <li>• Plant and equipment is maintained via the MEX system</li> <li>• No noise complaints have been received by the facility.</li> <li>• Noise monitoring has been undertaken and confirmed that the facility is inaudible at sensitive receivers</li> </ul>	Compliant
<b>Road Traffic Noise</b>				
B30	<p>Prior to the commencement of construction, the Applicant must prepare a Driver Code of Conduct and induction training for the development to minimise road traffic noise.</p> <p>The Applicant 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 development.</p>	<p>Form 203 - <i>Truck Driver induction</i>, Version 1, 3/5/21</p> <p>QHSE Integrated solutions site induction register from August 2021 to August 2022</p>	<p>Construction noise – beyond the scope of this audit.</p> <p>A truck driver induction for the site has been prepared and includes work health safety and environmental rules.</p> <p>A sample of the site induction register maintains records of drivers that have been inducted in the <i>Truck Driver induction</i>.</p>	Compliant
<b>AIR QUALITY</b>				
<b>Meteorological Station</b>				
B31	<p>Prior to the commencement of any works on-site, the Applicant must install and subsequently maintain during the life of the development, a suitable meteorological station on the site that complies with the requirements in the EPA's <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i>.</p>	Site inspection	<p>A weather station is located on the roof of the weigh bridge office (ClimeMet Weather station Model XC0369).</p> <p><u>Therefore, this condition has been deemed to be compliant.</u></p> <p>No documentation was available at the time of the audit to verify whether the weather station complied with the requirements of the EPA's <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i>. As there are no mandatory air sampling requirements imposed by this Approval or the EPL, determination on whether the weather station complies with the requirements in the EPA's <i>Approved Methods for</i></p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
			Sampling of Air Pollutants in New South Wales is deemed to be a low risk.	
<b>Dust Minimisation</b>				
B32	The Applicant must implement all reasonable and feasible measures to minimise dust generated during demolition, earthworks, construction and operation of the development.	<p>SOP – Managing dust suppression on the manufacturing facility floor dated 3/11/2020</p> <p>Site inspection</p> <p>NSW EPA Prevention Notice 35011381 dated 10/11/21.</p> <p>Thomas O'Connor – Operation Manager</p>	<p><b>EPA regulatory action</b></p> <p>During the reporting period, the EPA issued a Prevention Notice on 10 November 2021 in relation to a report received by the EPA on 2 November 2021 and subsequent observations made by EPA officers on 4 November 2021. In relation to dust, the Prevention Notice states:</p> <p><i>“On 2 November 2021 the EPA received a report of ‘excessive dust and hazy conditions’ coming from the Premises on 1 November 2021. The report also stated that excessive dust had left the Premises on two previous occasions on 20 September 2021 and 26 October 2021.</i></p> <p><i>And, on 4 November 2021, the EPA officers observed:</i></p> <p><i>“An accumulation of fine dust on internal horizontal structures within the processing shed, with some areas estimated to have an accumulation exceeding 15cm in depth. This dust appeared to further increase the fire risk at the Premises.”</i></p> <p>The EPA concluded that:</p> <p><i>“The waste is stored in a manner in which dust has accumulated within the building increasing the risk of a pollution incident (fire) occurring.”</i></p> <p><u>On this basis, a non-compliance has been awarded for the purposes of this audit as “all reasonable and feasible measures to minimise dust generated... during operation of the development” had not been implemented.</u></p>	<b>Non-compliant</b>
		<p>Site inspection</p> <p>Interview Traffic Controller, Kenneth</p> <p>Interview Plant Operator, Wanita</p>	<p><b>Reasonable and feasible measures</b></p> <p>Since the regulatory action taken by the EPA, CRRRF has implemented the following dust controls:</p> <ul style="list-style-type: none"> <li>when trucks tip, sprinklers are triggered by spotters, if required for dusty loads.</li> <li>A fogger system has been installed across the conveyor line</li> </ul>	

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
		Interview Maintenance, Manager Nick Davis	<ul style="list-style-type: none"> <li>dust filtration system (sock) has been installed</li> <li>polo citris (soapy agent) mister is applied at key drop points and shredders</li> <li>regular cleaning of horizontal surfaces is undertaken</li> <li>daily check for dust and dust build-up is undertaken by the HSE Manager and recorded on the daily checklist.</li> </ul> <p>During the site inspection, it was observed that working areas within the building, whilst dusty, did not exhibit excessive dust build-up. Clean-up crews were observed removing dust from accessible areas such as the factory floor and walkways. Areas more difficult to access such as metal framework did exhibit a high dust loading. CRRF advised that these areas are typically maintained during major shut-down periods.</p> <p>The Maintenance Manager advised that further improvements are proposed to the fogger systems allowing more targeted zoning of dusty areas.</p> <p>Discussions with site personnel confirmed that receivals area sprays and plant foggers are manually operated by the traffic controller and plant operator respectively.</p> <p>There have been no complaints related to dust in 2022.</p> <p><b>Refer to Recommendation 2022 R-01 in Section 4.1 of this port.</b></p>	
		<p>CRRRF Air and dust monitoring register</p> <p>AirSafe Test reports for Dust Deposition Gauges DDG for periods:</p> <ul style="list-style-type: none"> <li>13/12/21 to 13/1/22</li> <li>21/1/22 to 22/2/22</li> <li>22/2/22 to 22/3/22</li> <li>21/3/22 to 24/4/22</li> <li>24/5/22 to 22/6/22</li> </ul>	<p><b>Dust monitoring</b></p> <p>The site voluntarily established Dust Deposition Gauges (DDGs) to monitor dust emissions. Elevated dust levels were recorded predominantly on DDG monitors located on the eastern boundary of the site. The Airsafe test reports attributed the exceedances to poor dust control on site, however, CRRRF advised that the exceedances were not likely due to operational dust as major building openings are not located adjacent to the eastern boundary. Major building openings are located adjacent to the western boundary.</p> <p>It is the auditor's opinion that the CRRRF interpretation of the site's dust impact to surrounding environment is reasonable</p>	

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
		AirSafe Test reports for respirable dust for workers on 13/12/21  Safe Services, Air quality Monitoring dated April 2022	given the location of the dust monitors that exceeded the criteria, relative to the potential dust sources from the site.  The facility does however generate a large amount of dust within the processing hall and is heavily reliant on dust controls to prevent environmental dust emissions. On this basis, CRRF should consider the use of real-time environmental dust monitoring for early detection of conditions that may generate environmental dust emissions.  <i>Refer to Improvement Opportunity 2022 IO-02 in Section 4.2 of this report.</i>	
B33	During construction, the Applicant must ensure that: ...		This requirement was not triggered during this audit period.	
Air Quality Management Plan				
B34	Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6. The AQMP must:  (a) detail and rank all emissions from all sources of the development, including particulate emissions;  (b) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;  (c) identify the control measures that that will be implemented for each emission source; and  (d) 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		<i>This requirement was deemed “compliant” by the 2019 IEA.</i>	Closed



Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	vii. compliance monitoring.			
B35	The Applicant shall ensure the Air Quality Management Plan (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development.		Refer to Table A3, Section 4 and 5	Compliant
<b>Odour Management</b>				
B36	The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Site inspection	No activities likely to generate emission of offensive odour were identified during the site inspection.  There have been no complaints related to odour during the reporting period.	Compliant
<b>TRAFFIC AND ACCESS</b>				
<b>Roadworks and Access</b>				
B37	All vehicular crossings must be located a minimum of one metre from any utility pillar/pole.  Prior to the commencement of construction, the Applicant must prepare detailed design plans to the satisfaction of Council, demonstrating the access width is in accordance with AS 2890.2-2002 to accommodate the turning path of the largest servicing vehicle.  The Applicant must also liaise with Council's Subdivision Branch regarding replacing the drainage pit grate located within the western vehicular crossing.		Construction dust – beyond the scope of this audit.	
B38	All trucks leaving the operational site must depart via a wheel wash facility to prevent mud, dust or debris from being deposited on Council roads. The wheel wash facility must be designed and constructed in consultation with Council and to the satisfaction of the Planning Secretary prior to commencement of operations.	Site inspection	A wheel wash on site was observed at the time of the site inspection. The wheel wash was full of clean water and operational. There was no evidence of mud tracking or debris down gradient of the wheel wash.	Compliant
<b>Parking</b>				
B39	Prior to the commencement of operations, the Applicant must provide 42 on-site parking spaces for visitors and staff. Parking areas are to be constructed in accordance with the latest version of AS 2890.1.	Site inspection	Onsite parking places are provided on site as per the DA.	Compliant
<b>Construction Traffic Management Plan</b>				
B40	The Applicant must prepare a Construction Traffic Management Plan for the development to the satisfaction of the Planning Secretary prior to the		Construction TMP – beyond the scope of this audit.	

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	commencement of construction. The plan must form part of the CEMP required by Condition C1 and must: ...			
<b>Operating Conditions</b>				
B41	<p>The Applicant must ensure:</p> <ul style="list-style-type: none"> <li>(a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1 and AS 2890.2;</li> <li>(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;</li> <li>(c) the development does not result in any vehicles queuing on the public road network;</li> <li>(d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site;</li> <li>(e) all vehicles are wholly contained on site before being required to stop;</li> <li>(f) all loading and unloading of waste and other materials is carried out on-site;</li> <li>(g) all vehicular entries and exits must be made in a forward direction;</li> <li>(h) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; and</li> <li>(i) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.</li> </ul>	Site inspection	<p>Compliance with design standards were not assessed as part of this audit.</p> <p>It was confirmed during the site inspection that:</p> <ul style="list-style-type: none"> <li>• The development did not result in any vehicles queuing on the public road network.</li> <li>• Heavy vehicles and bins associated with the development were not parked on local roads or footpaths in the vicinity of the site.</li> <li>• Vehicles were wholly contained on site before being required to stop.</li> <li>• Loading and unloading of waste and other materials is carried out on-site.</li> <li>• Vehicular entries and exits were made in a forward direction.</li> <li>• Trucks entering or leaving the site with loads had their loads covered and did not track dirt onto the public road network. An effective wheel wash was in place.</li> </ul>	Compliant
<b>HAZARDS AND RISK</b>				
<b>Dangerous Goods</b>				
B42	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p><i>PROC31 – Pollution Incident Response Management</i></p>	On site, it was observed that except for the bulk diesel tank, other hazardous substances were minor in quantity. The diesel tank was double skinned and its refuelling area was appropriately bunded.	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
		<i>Plan</i> , Version 1.1, 11/07/2018.	<p>The storage of fuels and chemicals were generally in compliance with AS 3833:2007 <i>The storage and handling of mixed classes of dangerous goods, in packages and intermediate bulk containers, and the NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants handbook</i></p> <p>The storage of fuels and chemicals were observed at the time of the inspection, including:</p> <ul style="list-style-type: none"> <li>• spill kits were available and accessible.</li> <li>• The oxygen and acetylene were stored separately</li> <li>• all 205L drums were located on portable bunds or within a bunded area.</li> <li>• Class 3 chemicals were stored in a flammable goods cabinet</li> </ul> <p>It was observed however that:</p> <ul style="list-style-type: none"> <li>• a minor quantity of Class 2 aerosol cans was stored with Class 3 product; and</li> <li>• labelling of the oxygen cylinder cage was incorrect.</li> </ul> <p>As these observations were relatively minor inconsistencies with the standards, they were raised with site personnel who undertook to resolve them on the spot.</p>	
<b>Further Requirements</b>				
B43	<p>The Applicant must store all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) all requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's '<i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i>' if the chemicals are liquid.</p> <p>In the event of an inconsistency between the requirements listed from a) to b) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>		Refer to Table A1, Condition B42.	Compliant
<b>CONTAMINATION</b>				
B44	Prior to the commencement of construction, the Applicant must prepare an unexpected finds protocol to ensure that potentially contaminated		<i>Construction – beyond the scope of this audit</i>	Closed

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	material is appropriately managed. The protocol must form part of the CEMP required by Condition C1 and must ensure any material identified as contaminated shall be disposed off-site, with the disposal location and results of testing submitted to Council, prior to its removal from the site.			
<b>VISUAL AMENITY</b>				
<b>Landscaping</b>				
B45	<p>Prior to the commencement of operation, the Applicant must prepare a Landscape Management Plan to manage the landscaping works on-site, to the satisfaction of the Planning Secretary. The plan must form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The plan must:</p> <ul style="list-style-type: none"> <li>(a) detail the species to be planted on-site;</li> <li>(b) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and</li> <li>(c) be consistent with the Applicant's Management and Mitigation Measures at Appendix 2.</li> </ul>		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	Closed
B46	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by Condition B45 for the life of the development.	<p>Client Services Agreement with Pickwick Security Services and Integrated site services scope</p> <p>Site inspection</p>	<p>The landscape management plan specifies a thin strip along the western boundary of the site to be landscaped with nominated shrubs. Site observations indicate that there was insufficient space between the pavement and the boundary fence to landscape the strip with shrubs. Gravel was placed in the space to prevent the growth of weeds.</p> <p>Otherwise, the site inspection confirmed that the landscaped areas of the site were well maintained and free of weeds and litter.</p> <p><b>Refer to Recommendation 2019 R-08 in Section 4.1 of the report.</b></p>	<b>Non-compliant</b>
<b>Building Materials</b>				
B47	The Applicant must carry out the development in accordance with the External Material Schedule shown on drawing numbers SK1103, SK3101 and SK3102 in Appendix 1, unless otherwise agreed by the Planning Secretary.		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	Closed
<b>Lighting</b>				

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
B48	The Applicant must ensure the lighting associated with the development: (a) complies with the latest version of AS 4282 (INT) - <i>Control of Obtrusive Effects of Outdoor Lighting</i> ; and is (b) mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	QI Electrical Services Lighting (General) - installation certificate dated 18 April 2018	The light installation certificate reported the lighting had been completed in accordance with BCA2016, AS1680.0-2009 and AS2293.1-2005. No evidence was available to confirm that the lighting complies with AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting.  CRRRF advised that in the four years of operation, the facility has not received a complaint regarding lighting. The facility is also located in an industrial area with low potential to impact sensitive receivers.  <u>On the balance of information available, this condition has deemed to be compliant.</u>	Compliant
<b>PART C: ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</b>				
<b>CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN</b>				
C1	The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Planning Secretary. The CEMP must: ...		Construction – beyond the scope of this audit.	Closed
C2	As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following: ...		Construction – beyond the scope of this audit.	Closed
C3	The Applicant must carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.		Construction – beyond the scope of this audit.	Closed
<b>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN</b>				
C4	The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Planning Secretary. The OEMP must:...		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	Closed
C5	The Applicant must operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.	OEMP and associated sub-plans	CRRRF operated the facility generally in accordance with the OEMP. A detailed assessment is provided in Table A3.	Compliant
<b>MANAGEMENT PLAN REQUIREMENTS</b>				
C6	The Applicant must ensure that the environmental management plans required under Condition C4 of this consent are prepared by a suitably		<i>This requirement was deemed "compliant" by the 2019 IEA.</i>	Closed

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	qualified person or persons in accordance with best practice and include:...			
<b>Revision of Strategies, Plans and Programs</b>				
C7	<p>Within three months of:</p> <ul style="list-style-type: none"> <li>(a) approval of a modification;</li> <li>(b) approval of an annual review under Condition C8;</li> <li>(c) submission of an incident report under Condition C1; or</li> <li>(d) completion of an audit under Condition C12,</li> </ul> <p>the Applicant must review, and if necessary, revise, the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.</p> <p><b>Note:</b> <i>This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i></p>	<p>Cleanaway ResourceCo Resource Recovery Facility (RRF) Emergency Services Information Package (ESIP) Rev), #12546652, dated 27/5/22</p>	<p>The OEMP and sub-plans have not been reviewed and updated since the 2019 IEA report. The IEA report made recommendations for updating the OEMP and sub plans. The recommendations have not been implemented.</p> <p><b>Refer to Recommendation 2022 R-03 in Section 4.1 of this report.</b></p> <p>CRRRF advised that:</p> <ul style="list-style-type: none"> <li>• ESIP was updated following instruction by the EPA.</li> <li>• it has engaged GHD to update all the plans commencing with the Water Management Plan.</li> </ul>	<b>Non-compliant</b>
<b>ANNUAL REVIEW</b>				
C8	<p>Each year, the Applicant must review the environmental performance of the development to the satisfaction of the Planning Secretary. This review must: ...</p> <ul style="list-style-type: none"> <li>(a) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the next year;</li> <li>(b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against the: <ul style="list-style-type: none"> <li>i. the relevant statutory requirements, limits or performance measures/criteria;</li> <li>ii. requirements of any plan or program required under this consent;</li> <li>iii. the monitoring results of previous years; and</li> <li>iv. the relevant predictions in the EIS;</li> </ul> </li> <li>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</li> </ul>	<p>Annual Return statement of annual compliance # 20937 for periods:</p> <ul style="list-style-type: none"> <li>• #2089 9/5/17 to 8/5/18</li> <li>• #3927 9/5/18 to 8/5/19</li> <li>• #6085 9/5/19 to 8/5/20</li> <li>• #8329 9/5/20 to 8/5/21</li> <li>• #10104 9/5/21 to 8/5/22</li> </ul>	<p>Site personnel had incorrectly understood that this requirement was satisfied by completing the EPA annual return. Evidence was provided of EPA annual returns, however they do not address all the requirements of this condition:</p> <ul style="list-style-type: none"> <li>(a) Development activities are not described</li> <li>(b) Review of monitoring data is not described</li> <li>(c) Noncompliance described against EPL (but not Approval)</li> <li>(d) Trends not identified</li> <li>(e) Comparison between predictions and actual environmental performance are not described</li> <li>(f) Measures to be implemented for improvement are not described.</li> </ul> <p>Annual reviews for the purpose of satisfying Condition C8 have not been undertaken.</p> <p><b>Refer to Recommendation 2022 R-04 in Section 4.1 of this report.</b></p>	<b>Non-compliant</b>

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	<p>(d) identify any trends in the monitoring data over the life of the development;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measures will be implemented over the next year to improve the environmental performance of the development.</p>			
<b>REPORTING</b>				
<b>Incident Reporting</b>				
C9	The Applicant must notify the Planning Secretary and any other relevant agencies of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the development immediately after the Applicant becomes aware of the incident.		CRRRF advised that no incident or potential incident with actual or potential significant off-site impacts occurred within the audit period.	Not triggered
C10	Within seven days of the date of this incident, the Applicant must provide the Planning Secretary and any relevant agencies with a detailed report on the incident.		CRRRF advised that no incident or potential incident with actual or potential significant off-site impacts occurred within the audit period.	Not triggered
<b>Regular Reporting</b>				
C11	The Applicant must provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Operational Environmental Management Plan, GHD, 14 March 2018, Version 5	The OEMP and associated plans do not specify any reporting on the environmental performance of the development on its website.	Not triggered
<b>AUDITING</b>				
<b>Independent Environmental Audit</b>				
C12	<p>Within six months of the commencement of operation, and every three years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <p>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) include consultation with the relevant agencies;</p>	OptimE Pty Ltd report "Cleanaway ResourceCo RRF SSD 7256, Independent Environmental Audit, March 2019 Rev0	<p>The first IEA was undertaken for the reporting period 1 June 2018 to 31 January 2019. The audit report addressed the requirements of Condition C12.</p> <p>This IEA was due to be conducted three years thereafter for the period 1 February 2019 to 31 January 2022, however it was not commissioned until 29 July 2022, approximately 6 months late, <u>hence a non-compliance was awarded.</u></p>	<b>Non-compliant</b>



Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	<p>(c) assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these consents.</p> <p><b>Note:</b> This audit team must be led by a suitably qualified auditor and include relevant experts in any other fields specified by the Planning Secretary.</p>		<p>As described in Section 1.4 of the report, this report documents the second IEA for the development and covers the period 1 February 2019 to 31 July 2022.</p> <p>The audit period for the second IEA was extended from 3 years (36 months) to 3.5 years (42 months). It was agreed between the auditor and auditee that extending the audit period would provide a more contemporary audit finding, most representative of the development's environmental performance and compliance. The extended audit period was confirmed by OptimE in a letter to DPE dated 10 August 2022.</p> <p>Refer to Appendix B for correspondence with DPE.</p> <p><b>Recommendation:</b> As this audit has been commissioned, no further action is required to address this noncompliance.</p>	
C13	Within two months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report.	<p>DPE letter of approval, 17/12/2018.</p> <p>DPE email for an extension of time, dated 26/02/19</p> <p>DPE email to OptimE 30/08/2022.</p>	<p>For the 2019 IEA, the DPE email dated 26/02/19 granted an extension of time for the submission of the IEA until COB 19 March 2019. CRRRF did not maintain records associated with the submission of the 2019 IEA to DPE therefore the auditor sought records from DPE. In an email to OptimE dated 30/08/22, DPE confirmed that it received a copy of the 2019 IEA and CRRRF response.</p> <p>For the 2022 IEA, DPE agreed to an extension of time until 31 October 2022 to submit the finalised IEA report to the Department. The due date had not been triggered at the time of finalising this IEA.</p>	Compliant
<b>ACCESS TO INFORMATION</b>				
C14	<p>The Applicant must make copies of the following publicly available on its website:</p> <p>(a) the documents referred to in Condition A2;</p> <p>i. all current statutory approvals for the development;</p> <p>ii. all approved strategies, plans and programs required under the conditions of this consent;</p> <p>iii. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p>	<p><a href="https://resourceco.com.au/documents">https://resourceco.com.au/documents</a></p> <p>Operational Environmental Management Plan, Wetherill Park RRF, March 2018</p> <p>Air Quality Management Plan, Wetherill Park RRF, July 2017</p> <p>Energy from Waste Management Plan, Wetherill Park RRF, February 2018</p>	<p>CRRRF provided a link to publicly available documents on its website. The following documents were publicly available:</p> <ul style="list-style-type: none"> <li>The OEMP and associated management plans</li> <li>The EPL.</li> </ul> <p>The following documents were not accessible.</p> <ul style="list-style-type: none"> <li>The Development Application</li> <li>Monitoring results</li> <li>complaints register</li> <li>annual reviews</li> <li>2019 IEA and CRRRF response to the recommendations.</li> </ul>	

Approval (ID)	Requirement	Evidence Collected	Audit findings	Compliance Status
	iv. a complaints register updated on a monthly basis;	Landscape Management Plan, Wetherill Park RRF, February 2018	<i>Refer to Recommendation 2019 R-09 in Section 4.1 of this report.</i>	
	v. the annual reviews of the development;			
	vi. any independent environmental audit of the development and the Applicant's response to the recommendations in any audit;	Leachate Management Plan, Wetherill Park RRF, March 208		
	vii. any other matter required by the Planning Secretary; and	Water Management Plan, Wetherill Park RRF, March 2018		
(b)	keep this information up to date, to the satisfaction of the Planning Secretary.	Emergency Plan (incorporating Pollution Incident Response Management Plan), May 2022		
		Emergency Services Information Package (ESIP), May 2022		
		Environment Protection Licence 20937 dated 25 Jan 2021		

## Appendix A- Table A2: Environmental Protection Licence (EPL 20937) Compliance Table

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
1	<b>ADMINISTRATIVE CONDITIONS</b>			
A1	<b>What the licence authorises and regulates</b>			
A1.2	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <p>Scheduled activity-</p> <ul style="list-style-type: none"> <li>Resource recovery</li> <li>Waste storage</li> </ul>	Site inspection	<p>The following scheduled activities were observed on the premises:</p> <ul style="list-style-type: none"> <li>Resource recovery</li> <li>Waste storage</li> </ul> <p><i>Limitation of assessment: This audit did not assess whether any other activities listed in Schedule 1 of the POEO Act were occurring on the site.</i></p>	Compliant
A2	Premises or plant to which this licence applies			
A2.1	<p>Licence applies to the following premises:</p> <p>RESOURCECO 35-37 France Street Wetherill Park NSW 2164 Lot 31 DP 589097</p>			Compliant
A3	Information supplied by the EPA			
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>(a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p>		Beyond the scope of the audit.	

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of the licence.			
<b>2</b>	<b>LIMIT CONDITIONS</b>			
<b>L1</b>	<b>Pollution of waters</b>			
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.		Refer to Table A1, Condition B15 and B16	Compliant
<b>L2</b>	<b>Waste</b>			
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</p> <ul style="list-style-type: none"> <li>General solid waste (non-putrescible)</li> <li>Synthetic fibre waste (from materials such as fibreglass, polyesters and other plastics), but excluding asbestos waste</li> <li>Wood waste</li> <li>Glass, plastic, rubber, plasterboard, ceramics, bricks, concrete or metal</li> <li>Paper or cardboard</li> <li>Building and demolition waste</li> </ul>		Refer to Table 1 Condition B1	Compliant
L2.2	The authorised amount of waste permitted on the Premises cannot exceed 7,000 tonnes at any one time.	<a href="http://WARRP.epa.nsw.gov.au/pages/dashboard">http: WARRP.epa.nsw.gov.au/pages/dashboard</a> WARRP Report May 2022 WARRP Report October 2021 WARRP Report March 2020	Waste tonnages on site are tracked and reported to the EPA via the monthly WARRP reports. The 7000 tonnes limit is tracked by the WARRP report.	Compliant
L2.3	All processed and unprocessed waste must be stored within the building. Processed, wrapped and baled PEF may be stored outside in the designated area to the south of the baler (As marked by the grid in the site plan of Appendix A of "ResourceCo RRF Pty Ltd Operational	NSW EPA Prevention Notice 35011381 dated 10/11/21	Refer to Table A1 Conditions B2 and B3.	<b>Non-compliant</b>

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<i>Environmental Management Plan Wetherill Park RRF</i> dated March 2018 (EPA ref DOC18/171623)).			
L2.4	The total amount of waste received at the premises must not exceed 250,000 tonnes per annum.		Refer to Table A1 Condition A6	Compliant
L2.5	Incoming waste must only be transported to the Premises from pre-qualified customers as per Section 6.2.3 of the <i>"ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF"</i> dated March 2018 (EPA ref DOC18/171623)).		Refer to Table A1 Condition A7	Compliant
L2.6	Incoming waste must comply with resource recovery criteria in specified in Table 1 of the EPA's Energy from Waste Policy Statement for each waste stream.		Refer to Table A1 Condition A7	Compliant
L2.7	Approval in writing must be sought from the EPA to receive <i>"Mixed commercial and industrial waste"</i> with <i>"No limit by weight..."</i> under Table 1 of the NSW EPA's <i>"NSW Energy from Waste Policy Statement"</i> .		<i>"Mixed commercial and industrial waste"</i> with <i>"No limit by weight..."</i> materials has not been received by the site.	Not triggered
<b>L3</b>	<b>Noise limits</b>			
L3.1	Noise generated at the Premises must not exceed the noise limits in the Table below <ul style="list-style-type: none"> <li>Any residential receiver not associated with the Premises LAeq(15 minute) 35dB(A)</li> </ul>		Refer to Table A1 Condition B28	Compliant
L3.2	For the purpose of condition L3.1; <ul style="list-style-type: none"> <li>Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays.</li> <li>Evening is defined as the period 6pm to 10pm.</li> <li>Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sunday and Public Holidays.</li> </ul>			Noted
L3.3	The noise limits set out in condition L3.1 apply under all meteorological conditions except for the following: <ul style="list-style-type: none"> <li>Wind speeds greater than 3 metres/second at 10 metres above ground level.</li> </ul>	Wilkinson Murray, Extension of Operating Hours 15278-N Version C dated May 2019	The Wilkinson Murray Noise report did not document the meteorological conditions although it noted conditions were "fair". Therefore, it has been assumed that this condition was not triggered.	Not triggered

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or</li> <li>Stability category G temperature inversion conditions</li> </ul>			
L3.4	<p>For the purposes of condition L3.3:</p> <p>Data recorded by a meteorological station installed on the Premises must be used to determine:</p> <ul style="list-style-type: none"> <li>meteorological conditions; and</li> <li>Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy.</li> </ul>	Wilkinson Murray, Extension of Operating Hours 15278-N Version C dated May 2019	Refer to table A2, Condition L3.3	Not triggered
L3.5	<p>To determine compliance:</p> <p>(a) with the Leq(15 minute) noise limits in condition L3.1, the noise measurement equipment must be located:</p> <ul style="list-style-type: none"> <li>approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the Premises; or</li> <li>within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the Premises; or, where applicable</li> <li>within approximately 50 metres of the boundary of a National Park or a Nature Reserve.</li> </ul> <p>(b) with the LA1(1 minute) noise limits in condition L3.1, the noise measurement equipment must be located within 1 metre of a dwelling façade.</p> <p>(c) with the noise limits in condition L6.1, the noise measurement equipment must be located:</p> <ul style="list-style-type: none"> <li>at the most affected point at a location where there is no dwelling at the location; or</li> <li>at the most affected point within an area at a location prescribed by conditions L3.5(a) or L3.5(b).</li> </ul>	Wilkinson Murray, Extension of Operating Hours 15278-N Version C dated May 2019	The Wilkinson Murray Noise report did not document the location of the noise measuring equipment relative to residential property boundary or dwelling façade.	Not determined

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<p>L3.6 A non-compliance of condition L3.1 will still occur where noise generated from the Premises in excess of the appropriate limit is measured:</p> <ul style="list-style-type: none"> <li>at a location other than an area prescribed by conditions L3.5(a) and L3.5(b); and/or</li> <li>at a point other than the most affected point at a location.</li> </ul>	Wilkinson Murray, Extension of Operating Hours 15278-N Version C dated May 2019	<p>The Wilkinson Murray noise assessment concluded that:</p> <p><i>Industrial noise has been assessed in accordance with the NSW EPA Noise Policy for Industry (NPfI). The predicted noise levels indicate compliance with the criteria at the location of the nearest noise sensitive residential receiver and the nearest commercial receiver adjacent to the site for operational noise emissions in the night-time period.</i></p>	Compliant
	L3.7 For the purposes of determining the noise generated at the Premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	Wilkinson Murray, Extension of Operating Hours 15278-N Version C dated May 2019	The EPA Industrial Noise Policy (INP) has been superseded by the EPA's Noise Policy for Industry. The Wilkinson Murray noise assessment was undertaken in accordance with the "EPA's Noise Policy for Industry".	Compliant
<b>L4</b>	<b>Hours of operation</b>			
L4.1	<p>Construction works must only be undertaken:</p> <ul style="list-style-type: none"> <li>between the hours of 7:00am and 6:00pm Monday to Friday;</li> <li>between the hours of 8:00am and 1:00pm on Saturdays; and</li> <li>at no time on Sundays or public holidays.</li> </ul>	Construction – beyond the scope of the audit		Not triggered
L4.2	Works outside of the hours identified in condition L4.1 may be undertaken in the following circumstances...	Construction – beyond the scope of the audit		Not triggered
L4.3	<p>Activities on the Premises, are only permitted between the following hours:</p> <p>Operation: Monday -Sunday 24 hours</p>		Refer to Table A1 Condition B24	Compliant
<b>L5</b>	<b>Potentially offensive odour</b>			
L5.1	<p>No condition of this licence identifies a potentially offensive odour for the purpose of Section 129 of the Protection of the Environment Operations Act 1997.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a</p>		Refer to Table A1 Condition B36	Compliant



Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	potentially offensive odour and the odour was emitted in accordance with conditions of licence directed at minimising odour.			
<b>3</b>	<b>OPERATING CONDITIONS</b>			
<b>O1</b>	<b>Activities must be carried out in a competent manner</b>			
O1.1	<p>Licensed activities must be carried out in a competent manner.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>(a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</li> <li>(b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</li> </ul>	NSW EPA Prevention Notice 35011381 dated 10/11/21.	<p>EPA issued a Prevention Notice on 10/11/21 in relation to a report received by the EPA on 2 November 2021 and subsequent observations made by EPA officers on 4 November 2021. The EPA concluded that:</p> <p><i>The waste stockpiled at the Premises is not stored in a competent manner in accordance with condition O1.1 of the Licence which states "Licensed activities must be carried out in a competent manner. This includes a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity".</i></p> <p>This non-compliance was addressed by the NSW EPA Prevention Order 35011381. No further recommendation is made to address this non-compliance.</p>	<b>Non-compliant</b>
<b>O2</b>	<b>Maintenance of plant and equipment</b>			
O2.1	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <ul style="list-style-type: none"> <li>(a) must be maintained in a proper and efficient condition; and</li> <li>(b) must be operated in a proper and efficient manner.</li> </ul>		Refer to Table A1, Condition A23	Compliant
<b>O3</b>	<b>Dust</b>			
O3.1	Activities occurring in or on the Premises must be carried out in a manner that prevents or minimises the generation of dust.		Refer to Table A1, Condition B32	<b>Non-compliant</b>
O3.2	The Premises must be maintained in a condition which prevents or minimises the emission of dust from the Premises.		Refer to Table A1, Condition B32	<b>Non-compliant</b>

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
O3.3	The licensee must ensure no visible dust leaves the Premises.		Refer to Table A1, Condition B32	<b>Non-compliant</b>
O3.4	The licensee must ensure that no material, including sediment or oil, is tracked from the Premises.		Refer to Table A1, Condition B38	Compliant
<b>O4</b>	<b>Emergency response</b>			
O4.1	<p>The licensee must prepare, maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises.</p> <p>NOTE: The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (the POEO Act) and the POEO Regulations.</p>	<p>CRRRF Emergency Plan incorporating Pollution Incident Response Management Plan, Revision 0 dated 27 May 2022</p> <p>Toolbox records register</p> <p>Emergency evacuation observer checklists dated</p> <ul style="list-style-type: none"> <li>24/5/22</li> <li>27/5/22</li> </ul>	<p>The site has established and maintained a Pollution Incident Response Management Plan (PIRMP).</p> <p>Emergency evacuations in accordance with the plan were tested and observer records were maintained.</p>	Compliant
<b>O5</b>	<b>Other operating conditions</b>			
O5.1	Operations at the Premises must be undertaken in accordance with the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623).		Refer to Table A1- Condition C5	Compliant
O5.2	By no later than 5 October 2018, the Applicant must engage a suitably qualified person to undertake an audit of the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623). A report detailing the outcomes of the audit must be submitted to the EPA by no later than 7 December 2018.		<p>An audit against the ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623) was not undertaken.</p> <p><b>Refer to Recommendation 2019 R-10 in Section 4.1 of this report.</b></p>	<b>Non-compliant</b>
O5.3	Operations at the Premises must be undertaken in accordance with the "ResourceCo RRF Pty Ltd Energy from Waste Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171577).		Refer to Table A1-Condition B9	Compliant
<b>4</b>	<b>MONITORING AND RECORDING CONDITIONS</b>			
<b>M1</b>	<b>Monitoring records</b>			

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
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.		Environmental monitoring required by this licence includes meteorological data (Condition L3.4).	Noted
M1.2	All records required to be kept by this licence must be: <ul style="list-style-type: none"> <li>(a) in a legible form, or in a form that can readily be reduced to a legible form;</li> <li>(b) kept for at least 4 years after the monitoring or event to which they relate took place; and</li> <li>(c) produced in a legible form to any authorised officer of the EPA who asks to see them.</li> </ul>		Environmental monitoring required by this licence includes meteorological data (Condition L3.4). Records are maintained in accordance with this condition.	Compliant
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: <ul style="list-style-type: none"> <li>(a) the date(s) on which the sample was taken;</li> <li>(b) the time(s) at which the sample was collected;</li> <li>(c) the point at which the sample was taken; and</li> <li>(d) the name of the person who collected the sample.</li> </ul>		No samples are required to be maintained by this licence.	Not triggered
M2	<b>Recording of pollution complaints</b>			
M2.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	70 REG 101-Complaint. PDF	<p>The complaint register is maintained in SkyTrust which records incidents, complaints.</p> <p>An extract from the complaints register identified one entry on 15/10/2020 relating to dust, by an employee of a neighbouring industrial property.</p>	Compliant
M2.2	The record must include details of the following: <ul style="list-style-type: none"> <li>(a) the date and time of the complaint;</li> <li>(b) the method by which the complaint was made;</li> <li>(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;</li> <li>(d) the nature of the complaint;</li> </ul>	70 REG 101-Complaint. PDF	<p>The register extract included the following information:</p> <ul style="list-style-type: none"> <li>• site</li> <li>• date</li> <li>• time</li> <li>• method</li> <li>• received by</li> <li>• Reason for the complaint</li> <li>• Limited details of the complainant</li> <li>• Actions taken to resolve issue</li> </ul>	Compliant

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and (f) if no action was taken by the licensee, the reasons why no action was taken.			
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.		Refer to Table A2, Condition M2.1	Compliant
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.		Refer to Table A2, Condition M2.1	Compliant
<b>M3</b>	<b>Telephone complaints line</b>			
M3.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.		An environmental complaints number is advertised at the Truck and Emergency access entry point to the site.	Compliant
M3.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.		Refer to Table A2, Condition M3.1	Compliant
M3.3	The preceding two conditions do not apply until after the date of the issue of this licence.		Refer to Table A2, Condition M3.1	Compliant
<b>5</b>	<b>REPORTING CONDITIONS</b>			
<b>R1</b>	<b>Annual return documents</b>			

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ul style="list-style-type: none"> <li>(a) a Statement of Compliance,</li> <li>(b) a Monitoring and Complaints Summary,</li> <li>(c) a Statement of Compliance - Licence Conditions,</li> <li>(d) a Statement of Compliance - Load based Fee,</li> <li>(e) a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,</li> <li>(f) a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and</li> <li>(g) a Statement of Compliance - Environmental Management Systems and Practices.</li> </ul> <p>At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.</p>	<p>Annual Return statement of annual compliance # 20937 for periods:</p> <ul style="list-style-type: none"> <li>• #3927 9/5/18 to 8/5/19</li> <li>• #6085 9/5/19 to 8/5/20</li> <li>• #8329 9/5/20 to 8/5/21</li> <li>• #10104 9/5/21 to 8/5/22</li> </ul>	<p>Annual returns for the audit period were prepared in accordance with the EPA reporting template. Copies were sighted.</p> <p>The annual returns recorded a high level of compliance with the EPL, except for the following:</p> <ul style="list-style-type: none"> <li>• 2020/21 ARA Non-compliance with Condition L2.3 - Storage of baled material outside of designated area on 22/6/20.</li> </ul>	Compliant
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</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>	Refer to R1.1		Compliant
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ul style="list-style-type: none"> <li>(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</li> <li>(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.</li> </ul> <p><i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i></p>	Refer to R1.1		Not triggered
R1.4	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p>			Not triggered

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or (b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.			
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Refer to R1.1		Compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Refer to R1.1		Compliant
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: (a) the licence holder; or (b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Refer to R1.1		Compliant
<b>R2</b>	<b>Notification of environmental harm</b>			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.  <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>		There have been no incidents causing or threatening material harm to the environment.	Not triggered
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.		There have been no incidents causing or threatening material harm to the environment.	Not triggered
<b>R3</b>	<b>Written report</b>			
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	Penalty Notice 1576451 dated 01/03/2019  Penalty Notice 1602485 dated 10/11/2020	CRRRF was the subject of regulatory notices by the EPA during the audit period.  EPA regulatory activity was beyond the scope of this audit.	-

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	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.	Penalty Notice 3503002 dated 29/07/2022		
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.			
R3.3	<p>The request may require a report which includes any or all of the following information:</p> <p>a) the cause, time and duration of the event;</p> <p>b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</p> <p>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</p> <p>g) any other relevant matters.</p>			
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.			
<b>6</b>	<b>General Conditions</b>		Beyond the scope of the audit.	
<b>7</b>	<b>Pollution Studies and Reduction Programs</b>		Beyond the scope of the audit.	
<b>8</b>	<b>Special Conditions</b>		Beyond the scope of this audit	



## Appendix A, Table A3 – OEMP and Associated Subplans Compliance Table

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
<b>OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN</b>				
5.1	<b>Inductions</b> <ul style="list-style-type: none"> <li>All staff and sub-contractors are to be required to attend induction training and pass a competency test prior to commencing work. The induction covers health, safety and environmental requirements.</li> <li>A record of training attendance and induction will be kept on file.</li> </ul>	Form 203 - Truck Driver induction, Version 1, 3/5/21  QHSE Integrated solutions site induction register from August 2021 to August 2022	Training induction records were sighted which included: <ul style="list-style-type: none"> <li>Date</li> <li>Name</li> <li>Organisation</li> <li>Induction type and title</li> <li>Score and time taken and result</li> </ul> Induction records included Wetherill Park site inductions, driver induction, contractor/visitor inductions, new starter policies (labourer/picker)	Compliant
5.2	Tool box sessions <ul style="list-style-type: none"> <li>Toolbox meetings are to be held on a regular basis and cover health, safety and environmental topics.</li> </ul>	Toolbox records register dated 1/8/2022	Toolbox records were maintained in the toolbox register. The register included a summary of the topics discussed which were predominantly safety related. Environmental aspects were also discussed including environmental awareness, dust build-up, controlling chemicals, housekeeping, spill kits, asbestos bags, battery SOP, fires and emergency response.	Compliant
5.3	Environmental awareness <ul style="list-style-type: none"> <li>Environmental awareness training is aimed at increasing environmental awareness and promoting familiarity with environmental issues and aspects.</li> </ul>	ResourceCo Training: Environmental awareness	Environmental awareness training package includes: <ul style="list-style-type: none"> <li>Awareness of the site EPL</li> <li>General duties for employees</li> <li>Minimising environmental harm</li> <li>Generic licence conditions (that apply to ResourceCo sites)</li> <li>Exposure to Crystalline Silica Dust</li> <li>Drag-out (mud tracking off site)</li> </ul> Whilst the training package provides an environmental overview, it does not address the key environmental issues and controls for the site.	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
<i>Refer to Improvement Opportunity 2022 IO-03 in Section 4.2 of this report.</i>				
5.4	Emergency response <ul style="list-style-type: none"> <li>Staff will be trained in environmental controls as part of the emergency response training.</li> </ul>	Emergency evacuation observer checklists dated <ul style="list-style-type: none"> <li>24/5/22</li> <li>27/5/22</li> </ul>	An updated emergency plan was issued in May 2022.  Emergency evacuations in accordance with the plan were tested and observer records were maintained.	Compliant
6.1.1	<b>Operating hours</b>		Refer to Table A1, Condition B24. Operations is permitted 7 days per week, 24 hours per day.	Compliant
6.2.1	<b>Permitted wastes</b>		Refer to Table A1, Condition B1	Compliant
6.2.2	<b>Excluded wastes</b>		Refer to Table A1, Condition B1	Compliant
6.2.3	<b>Waste screening and acceptance</b> <ul style="list-style-type: none"> <li>Prequalification</li> <li>At facility               <ul style="list-style-type: none"> <li>the Customer Service and Weighbridge Operator will check with the driver if the waste meets the acceptance criteria</li> <li>Once the load is tipped the Waste Receiving Inspection Officer will inspect the load for waste types not accepted</li> </ul> </li> </ul>		Refer to Table A1, Condition A7	Compliant
6.2.4	<b>Waste monitoring</b> <ul style="list-style-type: none"> <li>The following details will be recorded and kept on file for all incoming waste received on the site:               <ul style="list-style-type: none"> <li>Quantity, type and source of waste</li> <li>Date and time of receipt</li> <li>PEF processing criteria category</li> <li>Copies of all documentation relating to tracking for controlled waste brought to the site</li> </ul> </li> </ul>		Refer to Table A1, Condition A7, B6, B7	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>○ Details of any hazardous or other prohibited materials (including asbestos) brought to the site</li> <li>• The following details will be recorded and kept on file for all material produced on site and disposed off site: <ul style="list-style-type: none"> <li>○ Quantity, type, quality and destination of outputs/products</li> <li>○ Quantity, type and destination of all waste/residuals sent for offsite disposal</li> <li>○ Copies of all documentation relating to tracking for all controlled waste leaving the site</li> </ul> </li> <li>• Training of receival staff to identify hazardous wastes</li> </ul>			
6.4	<b>Waste delivery</b> Weighbridge - the following information will be recorded: <ul style="list-style-type: none"> <li>• Vehicle registration</li> <li>• Customer name and address</li> <li>• On accessing the site, Gross Weight, on egressing the site Tare Weight, ascertaining the Net Weight</li> <li>• Categorisation of the waste materials (either C&amp;D recycling residues, C&amp;I "no limit PEF", C&amp;I "50% PEF" or mixed C&amp;D)</li> </ul>	Weigh bridge operator, Steve Records sighted for 26/08/22.	Refer to Table A1, Condition A7, B6, B7 A review of the weighbridge records confirmed the weigh bridge operator records: <ul style="list-style-type: none"> <li>• Date and time of inbound</li> <li>• Licence plate #</li> <li>• Name of customer</li> <li>• Waste classification</li> <li>• Tare, Loaded, Net weight</li> </ul> The weigh bridge operator has a high level camera to inspect the load and confirm the waste type. Further assessment is undertaken in the receivals hall by the traffic controller and plant operators with high level cameras.	Compliant
6.5	<b>Waste storage and processing</b> <ul style="list-style-type: none"> <li>• All processed and unprocessed waste will be stored within the building on the site.</li> <li>• Waste will be secured and maintained within designated waste storage areas at all times and is not to leave the site onto neighbouring public or private properties.</li> </ul>	Site inspection	The site inspection confirmed that all wastes, except for baled PEF, as permitted by the Approval, was stored within the building. Wastes within the building were secure within designated bins.	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>Processed, wrapped and baled PEF may be stored in the area designated on the approved plans for the outdoor storage of PEF, as described in Section 6.6.</li> </ul>			
6.6	<p><b>Finished PEF storage and despatch</b></p> <p>Finished PEF will be stored in the finished PEF storage area. This area is able to store approximately 1,800 tonnes and will be operated within the following parameters:</p> <ul style="list-style-type: none"> <li>10% of capacity to be designated quarantine area for out of specification PEF diversion temporary storage</li> <li>Minimise PEF to be stored on site at any one time (target = less than 1 day's production) to maximise the buffer storage space available in the event of a despatch issue.</li> </ul> <p>Should dispatch to suppliers be interrupted:</p> <ol style="list-style-type: none"> <li>Maximise the storage of PEF in the PEF storage area (this includes both the loose PEF stored with the PEF storage area of the building as well as the baled and wrapped PEF storage area of the site)</li> <li>Once the PEF storage area is full, cease manufacturing PEF until the undercover waste infeed area (which has a capacity of approximately 2,000 tonnes) is full</li> <li>Once both these areas are full, cease receiving waste at the facility. The waste type (general solid waste (non-putrescible)) is able to be disposed of at one of a number of landfills in western Sydney.</li> </ol>		<p>The facility produces High CV PEF and Low CV PEF. The PEF is stored in loose form within the building (southern hall) and sent to customers (Boral) by semi-trailer.</p> <p>Baled PEF destined for the international market is stored outside within a designated area, as permitted by the Approval.</p>	Compliant
6.12	<p><b>Fire prevention</b></p> <ul style="list-style-type: none"> <li>Onsite fire water tank and pumping equipment for firefighting</li> <li>Fire protection system (deluge) in the building</li> <li>Specific fire protection systems for major equipment</li> <li>Installation of portable fire extinguishers in suitable locations across the site</li> <li>Ban on smoking on site</li> </ul>	<p>Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.</p> <p>Site safety rules</p> <p>CRRRF Emergency Plan (incorporating Pollution Incident Response Management Plan) Rev 0 dated 27/05/2022</p>	<p>Certifying authority confirmed compliance with FRNSW recommendations.</p> <p>It is noted however that during the audit period, the CRRRF attracted the attention of Council, NSWFB and the EPA. Records of correspondence from the EPA documented that reasonable and feasible measures were not implemented for waste and dust management, leading to potential fire hazard.</p> <p>Since these observations by regulators, CRRRF has updated its Emergency Services Information Package (ESIP) and Emergency Plan.</p>	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>All fuels or flammable liquids for operational use will be stored in appropriately bunded, ventilated and secure stores</li> <li>Hot works permits will be used where appropriate.</li> <li>24-hour site coverage by fire trained people (either staff or security personnel when the site is not staffed)</li> </ul>	CRRRF Emergency Services Information Package (ESIP) Rev 0 dated 27/05/2022	<p>In addition, in correspondence to the auditor, Council advised that previous fire safety concerns at CRRRF had been investigated and resolved to Council's satisfaction.</p> <p>Following a recent visit by FRNSW to the site, FRNSW advised CRRRF that the visit did not constitute a fire safety audit. However, they observed a noticeable and remarkable improvement on the site. No immediate concerns were raised.</p>	
6.13	<b>Vehicle wheel washing</b>  ResourceCo will ensure that all trucks leaving the site will depart via a wheel wash facility	Site observation	Refer to Table A1, Condition B38	Compliant
9.1	<b>Energy from waste management</b> <ul style="list-style-type: none"> <li>Pre-qualify customers in accordance with the Incoming Waste Customer Pre-Qualification Procedure</li> <li>Demonstrate compliance with Energy from Waste Policy Statement Resource Recovery Criteria in accordance with the Energy from Waste Management Plan</li> </ul>	<i>Energy from Waste Management Plan</i> , GHD, 27 February 2018, Version 6  Services Rendered reports	Refer to Table A1, Condition A7, B6, B7  It is noted that the calculation method for the quarterly reports to the EPA in the EfWMP needs updating. Refer to Table A3 EfWMP Section 4 below.	Compliant
9.2	<b>Erosion and sediment control</b> <ul style="list-style-type: none"> <li>The site will be fully sealed.</li> <li>Install and maintain erosion and sediment controls as per the Water Management Plan</li> </ul>	Site observation	The site is fully sealed, except for areas where trenching has occurred for new plumbing.	Compliant
9.3	<b>Stormwater management</b> <ul style="list-style-type: none"> <li>Install and maintain water management structures to contain and treat all rainfall and runoff as per the Water Management Plan (Appendix M).</li> <li>Minimise the area of disturbance</li> <li>Install a tank farm to store stormwater collected on the site for re-use in dust mitigation</li> </ul>	Triaxial consulting, Stormwater Drainage Installation Certificate, dated 27/04/2018.  Site observations	Refer to Table A1, Condition B16	Compliant
9.4	<b>Leachate management</b> <ul style="list-style-type: none"> <li>Operate in accordance with the Leachate Management Plan (Appendix N)</li> </ul>	Triaxial consulting, Stormwater Drainage Installation Certificate, dated 27/04/2018.  Site observations	Refer to Table A1, Condition B16	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>Ensure all waste is received and delivered inside the building. No waste will be stored outside.</li> <li>Ensure dry sumps within the building are emptied and leachates removed from the site to an appropriately licenced disposal facility</li> </ul>			
9.5	<p><b>Noise management</b></p> <p>The approach to the management of noise on site will be to:</p> <ul style="list-style-type: none"> <li>All processing machinery is located within the manufacturing buildings, except where noted.</li> <li>Keep manufacturing building roller doors closed, except when access or egress from the building is required.</li> <li>Ensure all mobile plant used is fitted with silencers.</li> <li>Ensure all machinery, plant and equipment is maintained in proper working order in accordance with the manufacturer's requirements.</li> <li>Maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired.</li> <li>Assess noise emissions and implement actions to ensure compliance with the relevant conditions of the Development Consent.</li> <li>Maintenance of machinery, plant and equipment – as required.</li> <li>Recording of noise complaints – on occurrence.</li> <li>Noise monitoring: <ul style="list-style-type: none"> <li>Once the site is fully operational to gain an appreciation of noise levels and confirm source level estimations in the EIS</li> <li>As required by the EPL</li> <li>Based on receipt of a valid noise complaint</li> </ul> </li> </ul>	Site observations	<p>During the site inspection and interviews with site personnel, it was confirmed that:</p> <ul style="list-style-type: none"> <li>All processing occurs within the designated buildings</li> <li>Roller doors are kept closed at all times except for access and egress of vehicles.</li> <li>Plant and equipment is maintained via the MEX system</li> <li>No noise complaints have been received by the facility.</li> <li>Noise monitoring has been undertaken and confirmed that the facility is inaudible at sensitive receivers</li> </ul>	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>○ If any significant changes are made onsite which increases noise levels</li> </ul>			
9.6	<b>Air quality management</b> <ul style="list-style-type: none"> <li>• Minimise the areas of disturbance</li> <li>• Maintain dust suppression and extraction equipment at major dust generation points in the process</li> <li>• Maintain the dust suppression sprays at key process locations, including conveyors of the processing plant and stockpile sprinklers</li> <li>• Keep manufacturing building roller doors closed, except when access or egress from the building is required.</li> <li>• Use industrial sweeper to clean roadways and operational areas on a regular basis</li> <li>• Enforce a 20 km/h speed limit on internal roads to minimise dust generation</li> <li>• Ensure all loaded vehicles entering and leaving the site are covered</li> <li>• Undertake regular maintenance of mobile and fixed equipment to minimise exhaust emissions</li> </ul>	Site observations  PROC 42 - Driver Code of Conduct, Version 1.0, 30/11/2017	During the site inspection and interviews with site personnel, it was confirmed that: <ul style="list-style-type: none"> <li>• when trucks tip, sprinklers are triggered by spotters, if required for dusty loads.</li> <li>• A fogger system has been installed across conveyor line</li> <li>• dust filtration system (sock) has been installed</li> <li>• polo citris (soapy agent) mister is applied at key drop points and shredders</li> <li>• regular cleaning of horizontal surfaces is undertaken</li> <li>• daily check for dust and dust build-up is undertaken by the HSE Manager and recorded on the daily checklist.</li> <li>• it was observed that working areas, whilst dusty, did not exhibit excessive dust build-up. Clean-up crews were observed removing dust from accessible areas such as the factory floor and walkways. Areas more difficult to access such as metal framework did exhibit a high dust loading. CRRF advised that these areas are typically maintained during major shut-down periods.</li> <li>• The Maintenance Manager advised that further improvements are proposed to the fogger systems allowing more targeted zoning of dusty areas.</li> <li>• Discussions with site personnel confirmed that receivals area sprays and plant foggers are manually operated by the traffic controller and plant operator respectively.</li> </ul> <p>There have been no complaints related to dust in 2022.</p>	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
9.7	<b>Waste management</b> <ul style="list-style-type: none"> <li>Provide separate receptacles for recyclables</li> <li>Dispose of non-recyclable waste at an appropriately licenced landfill</li> <li>Encourage staff to adopt waste-reducing practices</li> </ul>	Site observations	Office staff are encouraged to minimise waste. Separate receptacles for recyclables were observed.	Compliant
9.8	<b>Traffic and access management</b> <ul style="list-style-type: none"> <li>Provide all new truck drivers with 'Site Induction for Drivers' form at the site entrance</li> <li>Provide drivers with the Site Traffic Management Policy</li> <li>Ensure all loads are fully covered prior to leaving the site</li> <li>Enforce a 20 km/h speed limit on internal roadways</li> <li>Ensure all vehicles enter and leave the site in a forward direction</li> </ul>	Site observations	<p>During the site inspection and interviews with site personnel, it was confirmed that:</p> <ul style="list-style-type: none"> <li>All drivers must sign onto the site induction when accessing the site. This is achieved via a QR code posted at the weigh bridge. A paper version is also available.</li> <li>All loads are fully covered when exiting the site</li> <li>The facility has been designed to ensure all vehicles entering and leaving the site will be in the forward direction.</li> </ul>	Compliant
9.10	<b>Hazard management</b> <ul style="list-style-type: none"> <li>Ensure all staff are inducted and receive ongoing training via toolbox talks regarding their responsibilities relating to handling, storage and disposal of dangerous goods, hazardous chemicals and spill training</li> <li>Ensure all hazardous chemicals are stored in accordance with AS 1940 guidelines – including covering, bunding, barriers, signage, etc where appropriate</li> <li>Maintain Safety Data Sheets (SDS) for each hazardous chemical that is kept on site at the storage facilities</li> <li>Provide spill kits in strategic locations across the site</li> <li>Ensure any spills are cleaned up immediately using spill kits and disposing of contaminated material at an appropriately licenced waste facility</li> </ul>	<p>SOP223 Refuelling mobile plant</p> <p>Fire attack training records</p> <p>Site observations</p>	<p>Training and inductions (Refer Table A3 Section 5.2).</p> <p>Refer Table A1, Condition B42.</p>	Compliant



Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>Ensure staff are trained in spill clean-up procedures and use of the spill kits at the site</li> <li>Installation of portable fire extinguishers in suitable locations across the site</li> <li>Ensure staff are trained in the use of first attack fire fighting</li> <li>Develop and implement a procedure for the refuelling of mobile plant</li> </ul>			
9.11	<b>Landscape management</b> <ul style="list-style-type: none"> <li>Install and maintain the landscaping of the site in accordance with the Landscape Management Plan (Appendix O)</li> <li>Maintain the site in a tidy manner and ensure the site is regularly cleaned and maintained</li> <li>Undertake weed management in accordance with the Landscape Management Plan (Appendix O)</li> </ul>		Refer Table A1, Condition B46	<b>Non-compliant</b>
9.12	<b>Litter control</b> <ul style="list-style-type: none"> <li>Ensure waste delivery occurs within the receival hall</li> <li>Operate a wheel wash facility to remove mud and any potential litter from trucks leaving the site</li> <li>Provide litter bins for staff on site</li> <li>Include in environmental awareness training for staff</li> <li>Include litter observations in regular site inspections</li> </ul>	Site observations	During the site inspection and interviews with site personnel, it was confirmed that: <ul style="list-style-type: none"> <li>waste delivery occurs within the receival hall</li> <li>a wheel wash facility was operational</li> <li>litter bins were provided for staff on site</li> <li>environmental awareness training is undertaken, and records were maintained.</li> <li>The HSE Manager undertakes daily inspection of the site including litter.</li> <li>The site was generally free of litter during the site inspection.</li> </ul>	Compliant
9.13	<b>Pests, vermin and noxious weed management</b> <ul style="list-style-type: none"> <li>Implement measures to manage pests, vermin and declared noxious weeds on the site</li> </ul>	Bug Stop Industrial Extermination Report # 108827 dated 11/12/18.  Client Services Agreement with Pickwick Security Services and Integrated site services scope	Refer to Table A1, Condition B12	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>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 in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.</li> </ul> <p>Management measures include:</p> <ul style="list-style-type: none"> <li>Tipping of all waste is to occur within the receival hall</li> <li>Regular inspections for pests/vermin/weed on the site</li> <li>Treatment of any infestations detected in incoming waste or within the facility immediately</li> <li>Engagement of a registered pest exterminator/controller for any treatment of detected infestations</li> </ul>	Site inspection		
<b>AIR QUALITY MANAGEMENT PLAN</b>				
4	<b>Management measures and control</b> <ul style="list-style-type: none"> <li>An industrial sweeper will be used to clean roadways and operational areas on a regular basis</li> <li>A 20 km/h speed limit will be enforced on internal roads to minimise dust generation</li> <li>All loaded vehicles entering and leaving the site will be required to be covered</li> <li>The main building will be fitted with dust suppression sprays at key locations, including conveyors of the processing plant and stockpile sprinklers</li> <li>Rapid roller doors will be installed in all locations where regular access is required</li> <li>Conventional doors will be installed in other locations which will remain closed during normal operations except for access and egress</li> <li>Engines of trucks and mobile plant will be switched off when not in use</li> </ul>	Site observations  PROC 42 - Driver Code of Conduct, Version 1.0, 30/11/2017	During the site inspection and interviews with site personnel, it was confirmed that: <ul style="list-style-type: none"> <li>when trucks tip, sprinklers are triggered by spotters, if required for dusty loads.</li> <li>A fogger system has been installed across conveyor line</li> <li>dust filtration system (sock) has been installed</li> <li>polo citris (soapy agent) mister is applied at key drop points and shredders</li> <li>regular cleaning of horizontal surfaces is undertaken</li> <li>daily check for dust and dust build-up is undertaken by the HSE Manager and recorded on the daily checklist.</li> <li>it was observed that working areas, whilst dusty, did not exhibit excessive dust build-up. Clean-up crews were observed removing dust from accessible areas such as the factory floor and walkways. Areas more difficult to access such as metal framework did exhibit a high dust loading. CRRF advised that these areas</li> </ul>	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>Maintenance and servicing of plant will be carried out in accordance with manufacturer's specifications</li> <li>Drop heights will be reduced during loading and unloading of material</li> <li>Dust suppression and extraction equipment will be installed at major dust generation points in the process.</li> <li>Incoming loads containing odorous materials will be identified immediately and rejected from the site</li> <li>Procedures for staff to report the presence of odours</li> </ul>		<p>are typically maintained during major shut-down periods.</p> <ul style="list-style-type: none"> <li>The Maintenance Manager advised that further improvements are proposed to the fogger systems allowing more targeted zoning of dusty areas.</li> <li>Discussions with site personnel confirmed that receivals area sprays and plant foggers are manually operated by the traffic controller and plant operator respectively.</li> </ul> <p>There have been no complaints related to dust in 2022</p>	
5	<b>Monitoring</b> <ul style="list-style-type: none"> <li>Record any dust/odour complaints in the Complaints Register – on occurrence</li> <li>Investigate and respond to any dust odour complaints in accordance with the Section 9.9 of the OEMP: Complaints handling, investigation and rectification and Section 5.2.3 below – on occurrence</li> <li>Dust observations at the property boundary – weekly as part of regular inspections</li> <li>Check Complaints Register for dust/odour issues – monthly</li> </ul>	Site interviews	<p>During the reporting period, there has been one compliant recorded for the site. The complaint was in relation to dust. The register documented investigations associated with the complaint.</p> <p>In addition to the requirements of the Air Quality Management Plan, the facility undertakes site boundary monitoring including dust deposition monitoring.</p> <p>Refer to Table A1, Condition B32/Dust Monitoring.</p>	Compliant
<b>WATER MANAGEMENT PLAN</b>				
2.2.2	<b>Stormwater pollution controls include a series of treatment devices:</b> <ul style="list-style-type: none"> <li>HumeGard HG18 GPT</li> <li>Humes JellyFish JF3000-19-4 Filter</li> <li>Ecosol RSF100 litter baskets</li> </ul>	<p>Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.</p> <p>Triaxial consulting, Stormwater Drainage Installation Certificate, dated 27/04/2018.</p> <p>Site observations (drain wardens only)</p>	<p>Refer to Table A1, Condition B16</p> <p>Ecosol RSF 100 litter baskets have been replaced with "Drain wardens" an in-pit equivalent.</p>	Complaint
2.3.1	<b>Fire water containment</b> <p>In the instance of a fire event, the facility design will cater for the containment of contaminated fire services water on site.</p>	Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.	Refer to Table A1, Condition A15	Complaint

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	Contaminated fire services water is to be removed from the site by vacuum truck.			
2.3.2	<p><b>Leachate management</b></p> <p>The waste materials received into the site will be dry in nature and will all be stored under cover in the manufacturing building. There will be no waste materials stored outside. In the rare instance that materials received into the manufacturing process release leachates, for example if a non-conforming load of wet waste is delivered, the design of the receiving slab levels caters for an effectively bunded area that grades to dry sumps within the receiving area.</p> <p>The dry sumps will be emptied via vacuum trucks and any leachates removed from the site to an appropriately licensed disposal facility.</p>	Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.	Refer to Table A1, Condition A15	Complaint
3.4	<p><b>Surface water monitoring</b></p> <p>The monitoring locations for the site are proposed based on the site surface water management, as summarised above and to characterise the majority of runoff. These site water quality sampling locations are listed below and are shown on drawing TX-11972.00 – C2.2 Issue C, provided as Appendix A.</p> <ul style="list-style-type: none"> <li>Upstream – within drainage easement at point the entry point to the 900 mm diameter culvert, adjacent to the NW corner boundary of the site. (sampled approximately 65 m upstream of the location where site runoff enters the easement pipe).</li> <li>Site discharge – within junction box ahead of JB1 to sample all runoff discharged from the site at this location</li> </ul>	Site inspection	<p>CRRRF has maintained water quality monitoring data since 2018. Some data is tabulated in excel spreadsheets. Some data is maintained in the laboratory report.</p> <p>It could not be determined from the records, whether monitoring was undertaken at the nominated locations.</p> <p><i>Refer to discussion in “Ongoing operations stage” below.</i></p> <p><b>Refer to Recommendation 2022 R-02 detailed in Section 4.1 of this report.</b></p>	<b>Non-compliant</b>
3.4.1	<p><b>Pre-commissioning stage</b></p> <ul style="list-style-type: none"> <li>Monitoring for the pre-commissioning stage will be following construction and be conducted for a duration of up to 12 months, prior to the commissioning stage</li> <li>Upstream monitoring only, When Site Sampling Trigger is activated at Upstream location with a maximum of one sampling event per month</li> </ul>		Pre-commissioning is beyond the scope of this audit	Not triggered

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<b>Commissioning Stage</b> <ul style="list-style-type: none"> <li>Commissioning Stage will continue until 12 months following construction (that is, the combined duration of the pre-commissioning and commissioning stage will be 12 months) at which point the ongoing operations stage begins.</li> <li>Upstream and site discharge monitoring, Site Sampling Trigger is activated at Upstream location with a maximum of one sampling event per month</li> </ul>		Commissioning is beyond the scope of this audit	Not triggered
	<b>Ongoing operations stage</b> <ul style="list-style-type: none"> <li>Upstream and site discharge monitoring, Site Sampling Trigger is activated at Upstream location with a maximum of one sampling event very six months</li> </ul> <p><i>Note: Staged Monitoring Site Sampling Trigger   More than 5 mm of rainfall recorded by an onsite meteorological station during operating hours of any one day. Once rainfall exceeding 5 mm is observed, trained site staff will access the monitoring location on a half-hourly basis during operational hours. The trigger is activated on first instance of runoff being observed at the monitoring location.</i></p>	<p>CRRRF Proc 215 – Stormwater sampling, Version 1.0 dated 1/7/22</p> <p>Excel Stormwater monitoring results</p> <p>Envirolab Certificate 217213</p> <p>Analysis of water samples dated 10/5/2019</p> <p>Sydney Analytical Laboratories SAL27275 Analysis of water samples dated 5/7/2019</p> <p>ALS Environmental Report, ES2100073 Analytical results for Stormwater testing dated 4/1/21</p> <p>ALS Environmental Report, ES2109787 Analytical results for Stormwater testing dated 18/3/21</p> <p>ALS Environmental Report, ES2224040 Analytical results for Stormwater testing dated 7/7/22</p> <p>Pre-commissioning stage water results archive</p>	<p>CRRRF has maintained water quality monitoring data since 2018. Some data is tabulated in excel spreadsheets. Some data is maintained in the laboratory report.</p> <p>Record keeping was generally adhoc. The records were not maintained in a manner to confirm whether:</p> <ul style="list-style-type: none"> <li>monitoring was undertaken in response to the “site sampling trigger”, as required by the Water Management Plan.</li> <li>monitoring was undertaken at the locations identified in the plan.</li> <li>sampling data was assessed against EPA requirements or ANZECC guidelines</li> <li>quality controls and records were maintained.</li> <li>Records are maintained in accordance with the CRRRF quality management system.</li> </ul> <p><u>As these key elements of the monitoring program could not be determined, a noncompliance has been awarded.</u></p> <p>CRRRF advised that the surface monitoring program outlined within the Water Management Plan did not provide clear direction to site personnel on what was required. CRRRF advised that they are seeking specialist advice on a review of the surface water monitoring requirements for the site.</p> <p><b>Refer to Recommendation 2022 R-02 detailed in Section 4.1 of this report.</b></p>	<b>Non-compliant</b>

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<b>Spill</b> <ul style="list-style-type: none"> <li>Upstream and site discharge monitoring, on each occasion of the Spill Monitoring Sampling Trigger being activated</li> </ul>		A spill with potential to discharge off site has not occurred during the audit period.	Not triggered
<b>LEACHATE MANAGEMENT PLAN</b>				
3	Management protocol for leachate and fire water <ul style="list-style-type: none"> <li>Fire water containment –               <ul style="list-style-type: none"> <li>Within building, sufficient detention has been provided 90 minutes of fire sprinklers active time</li> <li>Fire outside the main building, the shut off valve will be activated automatically or manually of required.</li> </ul> </li> <li>Leachate management               <ul style="list-style-type: none"> <li>No leachate to be generated with waste type.</li> <li>Any leachate that may generate with be contained within dry sumps within the building.</li> <li>Any leachate spill that occurs outside the manufacturing building, the shut off valve will be activated manually.</li> </ul> </li> </ul>		Fire water and leachate protocols have not been invoked.	Not triggered
<b>LANDSCAPE MANAGEMENT PLAN</b>				
5	Proposed landscaping  Detailed landscape plans are provided in Appendix A. These also provide information on the species to be planted on-site in the Plant Schedule on Drawing 0215-0954 LD 200.		Plantings were generally in accordance with the plan.	Compliant
6	Monitoring, maintenance measures and evaluation <ul style="list-style-type: none"> <li>Seasonal landscape watering and maintenance</li> <li>6 monthly checks of landscaping areas to assess degree of weed infestation, health of planted trees, shrubs and grasses and the presence of appropriate erosion and sedimentation controls</li> <li>Yearly weed control</li> </ul>	Client Services Agreement with Pickwick Security Services and Integrated site services scope  Site inspection	The site inspection confirmed that the landscaped areas of the site were well maintained and mostly free of weeds and litter.	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
<b>ENERGY FROM WASTE MANAGEMENT PLAN</b>				
4	<p>Calculation of percentages</p> <p>Formula:</p> $PEF \% \leq (100\% \times C\&D \text{ recycling residuals}) + (100\% \times \text{"no limit mixed C\&I" waste}) + (50\% \times \text{"50\% mixed C\&I" waste}) + (25\% \times \text{mixed C\&D waste})$ <p>The frequency of calculation will be 3 monthly (quarterly).</p>	<p>Energy from Waste Quarterly Report (Jun 21 to Aug 21)</p> <p>Energy from Waste Quarterly Report (Nov 21 to Feb 22)</p>	<p>The 2019 IEA determined that the PEF calculation formula used in the Energy from Waste Quarterly Report was:</p> $PEF \% \leq (100\% \times C\&D \text{ recycling residuals}) + (100\% \times C\&I \text{ recycling residuals}) + (100\% \times \text{"no limit mixed C\&I" waste}) + (50\% \times \text{"50\% mixed C\&I" waste}) + (25\% \times \text{mixed C\&D waste})$ <p>This was amended in consultation with the EPA. Correspondence sighted confirmed that the EPA has accepted the Energy from Waste Quarterly Report, 1 September 2018 to 30 November 2018 with the revised calculation method.</p> <p><i>A review of two sample quarterly reports for the audit period confirmed that the revised equation method still applied.</i></p> <p>A recommendation was made in the previous audit to update the EfWMP. This recommendation remains open hence a non-compliance has been awarded.</p> <p><b><i>Refer to Recommendation 2019 R-14 in Section 4.1 of the report.</i></b></p>	<b>Non-compliant</b>
5.2	PEF calculations and records generated will be identified, collected and stored in accordance with ResourceCo's quality management system.	Reports saved on ResourceCo N: Drive	Records were maintained on the company's N: Drive in accordance with the CRRRF quality system.	Compliant

## **Appendix B – Planning secretary approval letters**



Gary Hope  
Cleanaway ResourceCo RRF P/L  
35-37 Frank Street  
Wetherill Park NSW 2164

29/07/2022

Dear Mr Hope

**ResourceCo RRF (SSD-7256)  
Independent Auditor Endorsement**

I refer to your request (SSD-7256-PA-1) for the Secretary's endorsement of suitably qualified persons to prepare the Independent Audit for the ResourceCo RRF project (**Project**) SSD-7256, as modified (the **Consent**).

The Department of Planning and Environment (the **department**) has reviewed the nomination and information you have provided and is satisfied that the expert is suitably qualified and experienced.

Consequently, as nominee of the Secretary I endorse the appointment of the nominated auditor from OptimE Pty Ltd to undertake the Independent Audit for the Project, in accordance with Condition C12 of the Consent and the department's *Independent Audit Post Approval Requirements (2020) (IAPAR)*, as follows:

- Mr Maurice Pignatelli.

Please ensure this correspondence is appended to the Independent Audit Report.

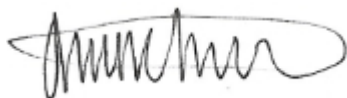
The Independent Audit must be prepared, undertaken and finalised in accordance with the IAPAR. Failure to meet these requirements will require revision and resubmission.

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

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

Should you wish to discuss the matter further, please contact Maria Divis, Senior Compliance Officer on 02 8275 1156 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely



Thomas Minchin  
A/Team Leader Compliance - Metro  
Compliance

As nominee of the Planning Secretary

GARY HOPE  
HEALTH SAFETY ENVIRONMENT QUALITY MANAGER  
CLEANAWAY RESOURCECO RRF P/L  
35-37 FRANK STREET  
WETHERILL PARK NSW 2164

08/08/2022

Dear Mr Hope

**ResourceCo RRF (SSD-7256)  
Extension to Independent Environmental Audit**

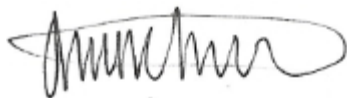
I refer to your request (SSD-7256-PA-2) submitted to the Department of Planning and Environment (the **department**) on 3 August 2022, seeking an extension of time to submit the Independent Environmental Audit report as required under conditions C12 and C13 of SSD 7256, as modified (the **consent**) for the ResourceCo RRF project.

The department notes that the reason for the request is to provide additional time for consultation with the EPA and Council.

As nominee of the Planning Secretary, I agree to an extension of time until **31 October 2022** to submit the finalised Independent Environmental Audit report to the department, together with the response to any recommendations in the audit report.

If you wish to discuss the matter further, please contact Maria Divis, Senior Compliance Officer on 02 8275 1156 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read "Thomas Minchin".

Thomas Minchin  
A/Team Leader Compliance - Metro  
Compliance

As nominee of the Planning Secretary

## **Appendix C – Consultation with agencies**

## Cleanaway ResourceCo RRF - Independent Environmental Audit 2022

### Agency consultation summary

#### Consultation summary

Agency	Date	Incoming / outgoing	Details
Department of Planning, Industry and Environment (DPIE), Compliance	9/08/2022	Outgoing	Introductory telephone discussion to Maria Divis, Senior Compliance Officer
	10/8/2022	Outgoing	Invitation to comment letter to DPE Compliance (REF: 2210.104_0 Letter to DPE) Emailed to: <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a>
	15/8/2022	Incoming	Email from DPE confirming that the department is not aware of any specific areas of concern in relation to the project that need to be included within the scope of the audit. Please ensure that the requirements of the Conditions of Consent and the IAPARs are satisfied in the submission.
	29/8/2022	Outgoing	Telephone discussion with DPE seeking records of correspondence between CRRRF and DPE.
	30/8/2022	Incoming	Email from DPE providing a copy of correspondence from DPE to CRRRF dated 25 November 2019.
Environment Protection Authority	10/8/2022	Outgoing	Introductory telephone discussion to Nathan Eager, EPA
	10/8/2022	Outgoing	Invitation to comment letter to EPA Compliance (REF: 2210.101_0 Letter to EPA) Emailed to: <a href="mailto:info@epa.nsw.gov.au">info@epa.nsw.gov.au</a> ; <a href="mailto:nathan.eager@epa.nsw.gov.au">nathan.eager@epa.nsw.gov.au</a>
	15/8/2022	Incoming	Email from EPA confirming that the EPA welcomes the opportunity to comment on your upcoming Audit.
	31/8/2022	Incoming	Letter response from EPA (DOC22-228067) dated 31 August 2022
Fairfield City Council (FCC)	10/8/2022	Outgoing	Invitation to comment letter to FCC Compliance (REF: 2210.102_0 Letter to Fairfield City Council) Emailed to: <a href="mailto:mail@fairfieldcity.nsw.gov.au">mail@fairfieldcity.nsw.gov.au</a>
	25/8/2022	Outgoing	Reminder email to FCC inviting a response by the due date.
	30/08/2022	Incoming	Email response from FCC dated 31 August 2022 advising: <ul style="list-style-type: none"> <li>Previous fire safety concerns at CRRRF had been investigated and resolved to Council's satisfaction.</li> <li>Council would not undertake an audit of the facility as it is a State Significant Development.</li> </ul>

Agency	Date	Incoming / outgoing	Details
			<ul style="list-style-type: none"> <li>Council has not been provided with an occupation certificate for the facility.</li> </ul>
Fire and Rescue NSW (FRNSW)	10/8/2022	Outgoing	Invitation to comment letter to FRNSW Compliance (REF: 2210.103_0 Letter to FRNSW) Emailed to: <a href="mailto:firesafety@fire.nsw.gov.au">firesafety@fire.nsw.gov.au</a>
	25/8/2022	Outgoing	Reminder email to FRNSW inviting a response by the due date.
	01/9/2022	Incoming	Email response from NSWFR dated 1 September 2022 advising: <ul style="list-style-type: none"> <li>FRNSW inspected the premises 2 years ago due to the receipt of a Fire Safety Concern, and an ensuing Letter was issued to Fairfield Council.</li> <li>FRNSW is not an auditing agency.</li> <li>Recommendation to engage a suitably qualified Building Surveyor to perform the audit.</li> </ul>
	06/9/2022	Incoming	Email response from NSWFR requesting an extension of time to provide additional comment.
	07/9/2022	Outgoing	Email response from OptimE offering an extension of time till 13/9/2022.

**From:** [Maria Divis](#)  
**To:** [Maurice Pignatelli](#)  
**Cc:** [Gary Hope](#)  
**Subject:** RE: SSD 7256 - Independent Audit Cleanaway ResourceCo RRF  
**Date:** Monday, 15 August 2022 9:39:24 AM  
**Attachments:** [image003.png](#)

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Good morning Maurice

Thank you for consulting with the Department of Planning and Environment (the **department**) in order to obtain input into the scope of the Independent Environmental Audit (**IEA**), in accordance with the Independent Audit Post Approval Requirements 2020 (**IAPARs**).

The department is not aware of any specific areas of concern in relation to the project that need to be included within the scope of the audit. Please ensure that the requirements of the Conditions of Consent and the IAPARs are satisfied in the submission.

For further enquiries, please contact me on the below details.

Kind regards,

**Maria Divis**

**Senior Compliance Officer** (Mon-Thurs)

Planning & Assessment | Department of Planning and Environment

T 02 8275 1156 | E [Maria.Divis@planning.nsw.gov.au](mailto:Maria.Divis@planning.nsw.gov.au)

Locked Bag 5022 | PARRAMATTA NSW 2124

[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*The Department of Planning and Environment acknowledges that it stands on Aboriginal land.*

*We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

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**From:** Maurice Pignatelli <[maurice@optimenv.com.au](mailto:maurice@optimenv.com.au)>

**Sent:** Wednesday, 10 August 2022 6:25 PM

**To:** DPE PSVC Compliance Mailbox <[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)>; Maria Divis <[Maria.Divis@planning.nsw.gov.au](mailto:Maria.Divis@planning.nsw.gov.au)>

**Cc:** Gary Hope <[Gary.Hope@resourceco.com.au](mailto:Gary.Hope@resourceco.com.au)>

**Subject:** SSD 7256 - Independent Audit Cleanaway ResourceCo RRF

Hi Maria

Thank you for taking my call yesterday morning. As discussed, Optime Pty Ltd has been engaged by Cleanaway ResourceCo to undertake an independent audit of its facility at 35-37 Frank Street, Wetherill Park in accordance with its development consent SSD 7256. The Department's audit guideline specifies that the auditor is to consult with the Department on the audit scope, hence this invitation for you to comment on the proposed audit scope, and an invitation to comment on

ResourceCo RRF performance.

Please refer to the letter attached for further detail.

If you have any questions, please do not hesitate to contact me.

**Maurice Pignatelli**

Director

Certified Lead Environmental Auditor

T: +61 407 493 176

E: [maurice@optimenv.com.au](mailto:maurice@optimenv.com.au)

W: [www.optimenv.com.au](http://www.optimenv.com.au)

**OptimE** Pty Ltd

Optimising Environmental Assurance



DOC22/228067

The Proper Officer  
OptimE PTY. LTD.  
24 GRAYS POINT ROAD,  
GRAYS POINT NSW 2232  
By email: Maurice Pignatelli <maurice@optimenv.com.au>

31 August 2022

Dear Mr Pignatelli,

**Response to Independent Environmental Audit of Cleanaway Resource Co RRF Pty Ltd  
35-37 Frank Street Wetherill Park - Development Consent SSD 7256**

The NSW Environment Protection Authority (EPA) refers to Environment Protection Licence No. 20937 (the Licence) held by Cleanaway Resourceco Rrf Pty Ltd (the Licensee) for the scheduled activity of recovery of general waste at 35-37 Frank Street, Wetherill Park NSW 2164 (the Premises).

**Why is the EPA writing to you?**

On 10 August 2022 the EPA received a letter from OptimE Pty Ltd (the Auditor) advising that they had been engaged by the Licensee to conduct an Independent Audit in accordance with development consent SSD 7256 for the period 1 February 2019 to 31 July 2022 (the Period). The Auditor invited comments from the EPA on the Licensee's compliance with the conditions of State Significant Development (SSD) 7256 and aspects of the development's environmental performance.

The EPA appreciates the Auditors invitation to submit comments on the Independent Environmental Audit for the Period. The EPA is the ARA for the *Protection of the Environment Operations Act 1997* (the Act) and the Licence and will provide comments on the development's environmental performance on this basis. The EPA is not the regulator under the *Environmental Planning and Assessment Act 1979* and is unable to provide comments on the Licensee's compliance with conditions of SSD 7256.

**The EPA's Comments**

The EPA can confirm that the Licence was issued for the entirety of the Period. During this time, the EPA has conducted nine inspections of the Premises.

During the Period the EPA is aware of two fire incidents that have occurred on the Premises. The first incident occurred on 20 August 2019, and the second incident occurred on or around 30-31 August 2020. In response to these fire incidents and the concerns of NSW Fire and Rescue, the EPA issued a Licence Variation on 25 January 2021 (See EPA record 1603927). The Variation included a Pollution Reduction Program (PRP) that required the Licensee to engage an independent suitably qualified and experienced person to conduct a Fire Mitigation and Risk Review and provide recommendations to improve environmental controls and reduce the environmental risk from fire at the Premises. The PRP remained in place on the Licence for the remainder of the Period.



During the Period, the EPA has taken regulatory action in response to multiple alleged breaches of the Act. A summary of these actions is outlined below:

- Penalty Notice (see EPA Record 1576451) issued on 01-Mar-2019 based on an alleged breach of section 64(1) of the Act observed on 24 January 2019. Reason – non-compliance with condition L2.3 of the Licence in that the Licensee was storing waste outside of permitted areas.
- Penalty Notice (see EPA Record 1602485) issued on 04-Nov-2020 based on an alleged breach of section 64(1) of the Act observed on 29 October 2019. Reason – non-compliance with condition L2.3 of the Licence in that the Licensee was storing waste outside of permitted areas.
- Prevention Notice (see EPA Record 3501381) issued on 10-Nov-2021 based on observations made at the Premises on 4-Nov-2021. Reason – Licenced activity allegedly had been carried on in an environmentally unsatisfactory manner in that:
  - Waste stockpiled at the Premises was not stored in a competent manner in accordance with condition O1.1 of the Licence,
  - The waste is not stored in accordance with NSW Fire and Rescue’s February 2020 “Fire Safety Guideline – Fire Safety in Waste Facilities”.
  - The waste was stored in such a manner that a pollution incident (fire) could occur or was likely to occur.
  - The waste was stored in a manner in which dust has accumulated within the building increasing the risk of a pollution incident (fire) occurring.
  - Waste and sediment laden water was flowing from the concrete forecourts of the Premises into stormwater infrastructure.
- Penalty Notice (see EPA Record 1602485) issued on 29-Jul-2022 based on an alleged breach of section 64(1) of the Act observed on 4-Nov-2021. Reason – non-compliance with condition O1.1 of the Licence in that the Licensee failed to store waste in a competent manner.

Any regulatory action taken by the EPA in relation to its licensed facilities is publicly available on the EPA’s Public Register, located at this link:

<https://apps.epa.nsw.gov.au/prpoeoapp/default.aspx?SearchTag=licence&searchrange=licence>

If you have any questions regarding this matter, please don’t hesitate to contact Nathan Eagar on 02 9274 6191.

Yours sincerely



**ROB HOGAN**  
Manager Regulatory Operations

**From:** [Kerren Ven](#)  
**To:** [Maurice Pignatelli](#)  
**Subject:** RE: Independent Audit Cleanaway ResourceCo RRF  
**Date:** Tuesday, 30 August 2022 3:31:00 PM  
**Attachments:** [image019.png](#)  
[image031.png](#)  
[image032.png](#)  
[image033.png](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Hi Maurice,

After a conversation with Council's Building Control and Compliance Team, the NSW Department of Planning and Environment and NSW Environmental Protection Authority are the appropriate regulatory authorities. Council would not carry out audits for the development given it is classified as a state significant development that currently has an EPL for the activity.

Despite the above, previous fire safety concerns had been investigated (CRM 428437/2020) and resolved to council's satisfaction. As part of the investigations, it was identified:

- an Interim Occupation Certificate for the premises was issued by Steve Watson & Partners on 15 May 2018 – this certificate references construction certificates 16/1688/01, 16/1688/02 & 16/1688/03;
- a fourth construction certificate (reference 16/1688/04) was issued by Steve Watson & Partners on 29 May 2018 – this certificate was for 'Endorsement of updated Fire Engineering Report S15332 R2.2 prepared by Olsson Fire & Risk';
- Fairfield Council has not been provided with an occupation certificate for the building works approved by construction certificate 16/1688/04, dated 29 May 2018.

Fairfield Council has not been provided with an occupation certificate for the building works approved as part of construction certificate 16/1688/04, issued by Steve Watson & Partners on 29 May 2018, and this should be arranged.

I hope this information is of assistance.

Kind regards,

**Kerren Ven**

Strategic Planner | Strategic Land Use Planning  
City Strategic Planning  
PO Box 21, Fairfield NSW 1860  
P 9725 0222 |

[www.fairfieldcity.nsw.gov.au](http://www.fairfieldcity.nsw.gov.au)  
[mail@fairfieldcity.nsw.gov.au](mailto:mail@fairfieldcity.nsw.gov.au)



*We acknowledge the Cabrogal of the Darug nation who are the Traditional Custodians of this*

**From:** [John Hawes](#)  
**To:** [Maurice Pignatelli](#)  
**Cc:** [Fire Safety](#)  
**Subject:** Independent Audit Cleanaway ResourceCo RRF  
**Date:** Thursday, 1 September 2022 2:52:20 PM  
**Attachments:** [image001.png](#)

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Maurice,

As discussed on the phone today FRNSW are not an Auditing agency for premises. FRNSW inspected the premises 2 years ago due to the receipt of a Fire Safety Concern, and an ensuing Letter was issued to Fairfield Council.

Our recommendation is to engage a suitably qualified Building Surveyor to perform the audit.

Kind regards,



**Superintendent John Hawes**

MANAGER FIRE SAFETY  
OPERATIONAL LIAISON & SPECIAL HAZARDS UNIT  
COMMUNITY SAFETY DIRECTORATE

M: 0429 420 401  
PH. (02) 9742 7406  
E: [john.hawes@fire.nsw.gov.au](mailto:john.hawes@fire.nsw.gov.au)  
1 Amarina Ave Greenacre NSW 2190  
Locked Bag 12, Greenacre, NSW, 2190  
[www.fire.nsw.gov.au](http://www.fire.nsw.gov.au)

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# **Appendix D – Independent audit declaration form**

**Independent Audit – Post Approval Requirements May 2020**  
**Appendix A - Declaration of Independence Form**

**Declaration of Independence - Auditor**


Project Name:	Cleanaway ResourceCo Resource Recovery Facility
Consent Number:	SSD 7256
Description of Project:	Waste and Resource Management Facility to convert waste material into Process Engineered Fuel (PEF) and reusable commodities.
Project Address:	35-37 Frank St, Wetherill Park NSW
Proponent:	Cleanaway ResourceCo
Date:	25 October 2022

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

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

Name of Proposed Auditor:	Maurice Pignatelli
Signature:	
Qualification:	BE (Civil) MEngSc (Public Health, Exemplar Global Lead Environmental Auditor - Certificate No. 110031
Company:	OptimE Pty Ltd

# **Appendix E – Status of the 2019 IEA Action Plan Summary table**

## Appendix E, Table E1 – Status of 2019 IEA Recommendations

R - #	Recommendation	Status at 2022 IEA
2019 R-01	<b>Noise</b> Undertake a noise impact assessment to confirm noise source level estimations in the EIS and predicted noise impacts to surrounding receivers.	<b>Status: Closed</b> An assessment of operational noise from the site was undertaken by Wilkinson Murray in May 2019, specifically for the purpose of changes to the operating hours to 24-hour use of the facility. Wilkinson Murray concluded that the measured and predicted noise levels indicate compliance with the NPfI criteria at the location of the nearest noise sensitive residential receiver, and noise from 24-hour use of the facility is not expected to have any impacts at the nearest noise sensitive residential receivers. Refer to Table A1, Condition B28.
2019 R-02	<b>Dust</b> Undertake a dust impact assessment of the facility. The assessment should consider: <ul style="list-style-type: none"> <li>Actual versus estimated annual levels of dust from operational activities and predicted impacts on surrounding receptors.</li> <li>Activities that generate dust and dust sources within those activities</li> <li>Effectiveness of current mitigation measures to control dust at source including process plant and equipment and operating instructions</li> <li>Effectiveness of the maintenance and inspection regime for the dust control systems associated with the plant.</li> </ul>	<b>Status: Closed</b> CRRRF has implemented additional dust controls and implemented an environmental and occupational dust monitoring program. Reasonable and feasible measures have been implemented to control dust from the facility. Refer to Table A1, Condition B32.
2019 R-03	<b>Stormwater</b> Develop a maintenance and inspection regime for the HumeGard HG18 GPT and Humes JellyFish JF3000-19-4 Filter to ensure the stormwater system is maintained in a proper and efficient condition.	<b>Status: Closed</b> Ocean Protect has been engaged to maintain the stormwater pollution controls (storm filter and ocean guards) in accordance with the OEMP (on a three times per year basis). Service maintenance reports were sighted for May 2021 to May 2022. Refer to Table A1, Condition B16. In addition, inspection of the stormwater pits is on the HSE Manager's daily checklist.
2019 R-04	<b>Water quality monitoring</b> Undertake the water quality monitoring program in accordance with the commissioning phase of the operation (Section 3.4.1 of the Water Management Plan). Maintain water quality sampling records in accordance with the EPL Condition M1.3.	<b>Status: Closed</b> The HSE Manager has determined that the water quality monitoring program in the Water Management Plan is not fit for purpose and has engaged a consultant to review and develop a water quality monitoring program suitable for the operational phase of the project. This recommendation has been superseded by 2022 R-02. Refer to Section 4.1 of this report.
2019 R-05	<b>Maintenance along the western boundary</b> In the interim to the implementation of modifications to the PEF baler and PEF bale storage area, increase resources to remove the litter and debris accumulated along the western boundary of the site and at stormwater inlets.	<b>Status: Closed</b> The western boundary was relatively litter free. The HSE manager inspects the area daily and clean-up crews are deployed when required.
2019 R-06	<b>Parking</b> Ensure all on-site parking spaces, as required by the Approval, are always available for visitor and staff parking.	<b>Status: Closed</b> The PEF bales stored in the parking area during the 2019 IEA have been removed. Onsite parking places are provided on site as per the DA.

R - #	Recommendation	Status at 2022 IEA
2019 R-07	<b>Hazardous Substances</b> Undertake an annual review of all hazardous substances stored on site against the requirements of Condition B43.	<b>Status: Closed</b> Hazardous substances are reviewed on a six-monthly basis and the SDS register is updated.
2019 R-08	<b>Landscaping</b> Provide landscaping to the site as specified in the Landscape Management Plan (LMP). Where this is not feasible, provide an alternate LMP and seek approval from the Department of Planning.	<b>Status: Open</b> CRRRF advised that grasses will be planted in the narrow garden between the western hardstand area and the boundary fence.
2019 R-09	<b>Web-page information</b> Report site monitoring results on the CRRRF web-page. Consult with DPE on the exclusion of any monitoring data that is required by the management plans but may be considered commercial in confidence.	<b>Status: Closed</b> Fewer documents are presented on the CRRRF webpage than during the 2019IEA. This recommendation has been superseded by 2022 R-05. Refer to Section 4.1 of this report.
2019 R-10	<b>Audit report to the EPA</b> Liaise with the EPA for a revised date for submission of an audit report detailing the outcomes of an OEMP audit.	<b>Status: Open</b> There has been no action taken to close out this recommendation.
2019 R-11	<b>Induction and Training</b> Develop an environmental awareness/induction program to ensure that all employees and contractors, including day labour, are provided with environmental inductions prior to commencement of work. The induction should be tailored to their environmental responsibilities on site.	<b>Status: Closed</b> The Induction training package has been upgraded with environmental awareness module however the training package is not site specific. This recommendation has been superseded with 2022 IO-03. Refer to Section 4.2 of this report
2019 R-12	<b>Quackers</b> Consider the incorporation of the following noise control into the OEMP, as specified in the statement of commitments: <ul style="list-style-type: none"> <li>Plant based at the site will be fitted with "quacker" style reversing alarms.</li> </ul>	<b>Status: Open</b> Quackers were heard on site at the time of the site inspection however the OEMP has not been amended to ensure that the use of "quackers" is incorporated as a control.
2019 R-13	<b>Lighting</b> Confirm that the external lighting complies with AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting.	<b>Status: Closed</b> CRRRF sought further information related to lighting from the landlord. Records to confirm external lighting complies with AS 4282 was not available. It is noted that the site is in an industrial area and there have been no complaints associated with lightning hence compliance has been awarded on the balance of information available.
2019 R-14	<b>EfWMP Calculation</b> Update the EfW calculation method in the EfWMP, so it is consistent with the calculation method approved by the EPA.	<b>Status: Open</b> The EfWMP has not been updated.



## Appendix E, Table E1 – Status of 2019 IEA Improvement Opportunities

IO - #	Recommendation	Status 2022
2019 IO-01	<b>Exercising the stormwater shut-off valve</b> The risk associated with the management of firewater or leachate entering the site stormwater system, would be reduced if a maintenance schedule was introduced for exercising the stormwater shut-off valve.	<b>Status: Closed</b> CRRRF has added exercising of the shut-off valve on the maintenance schedule. The valve has been exercised.
2019 IO-02	<b>Customer records - incoming waste</b> Maintain a controlled register of all pre-qualified incoming customers including pertinent information such legal entity (ABN/ACN number) and waste facility licence number.	<b>Status: Open</b> A list of pre-qualified incoming customers was sighted however it was not maintained in a controlled register.
2019 IO-03	<b>Stormwater</b> Develop a maintenance and inspection regime for the HumeGard HG18 GPT and Humes JellyFish JF3000-19-4 Filter to ensure the stormwater system is maintained in a proper and efficient condition.	<b>Status: Closed</b> The stormwater pollution controls (storm filter and ocean guards) had been maintained in accordance with the OEMP (on a three times per year basis). Service maintenance reports were sighted for May 2021 to May 2022.
2019 IO-04	<b>Waste Monitoring Program</b> Establish a document that collates all the requirements of the Condition B10 into one concise "Waste Monitoring Program" as a reference for personnel responsible for the monitoring of incoming and outgoing wastes.	<b>Status: Open</b> There has been no action taken to close out this recommendation.
2019 IO-05	<b>Driver Code of Conduct</b> Additional noise controls should be added to the Driver Code of Conduct. These may include controls for noise associated with loading and unloading, keeping voices and music down, idling on site, minimise vehicle maneuvering on site.	<b>Status: Closed</b> Noise control has been added to the Driver Code of Conduct.
2019 IO-06	<b>Update the OEMP</b> Revise the OEMP to include: <ul style="list-style-type: none"> <li>• Explicit environmental responsibilities and authorities for key CRRRF personnel</li> <li>• Procedures to inform the local community of CRRRF operations, as required.</li> <li>• Consistency in documentation regarding commitment to notify of DPE, in the event of an environmental incident or emergency.</li> <li>• The record keeping requirements of the EPL (Condition M1.2 and M1.3) should be referenced in the OEMP.</li> <li>• In its objectives, include:               <ul style="list-style-type: none"> <li>○ A commitment to new technologies throughout the life of the plant.</li> <li>○ Extent to which it encourages and facilitates community participation in the recycling of building and construction waste.</li> </ul> </li> <li>• Reference to AS 3833:2007 The storage and handling of mixed classes of dangerous goods, in packages and intermediate bulk containers, and the NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants handbook</li> <li>• Improved guidance on how primary legislation referenced in the OEMP applies to operations</li> </ul>	<b>Status: Open</b> The OEMP has not been updated. CRRRF advised that it has engaged a consultant to update the OEMP and supporting sub-plans. It is noted that the Emergency plan incorporating pollution incident response action plan has been updated.

IO - #	Recommendation	Status 2022
2019 IO-07	<b>Legislation</b> <p>The following Sections of the Protection of the Environment Operations Act 1997 and their obligations should be referenced in the OEMP:</p> <ul style="list-style-type: none"> <li>• Section 120 - Pollution of waters</li> <li>• Section 129 – Potentially offensive odour</li> </ul>	<b>Status: Open</b> <p>There has been no action taken to close out this recommendation.</p>
2019 IO-08	<b>Monitoring and inspection program</b> <p>Develop a detailed monitoring and inspection program to capture the commitments made in the OEMP and ensure they are always implemented. The monitoring and inspection program could be structured as a series of checklists for weekly, monthly, quarterly and annual inspections depending on the specific requirement.</p>	<b>Status: Closed</b> <p>CRRRF conducts a monthly multidisciplinary audit across the site including some environmental observations such as:</p> <ul style="list-style-type: none"> <li>• Stormwater runoff</li> <li>• Chemical storage</li> <li>• Dust control</li> <li>• Fuel storage</li> </ul>
2019 IO-09	<b>Maintenance of plant and equipment</b> <p>The OEMP should identify (or reference documents which identify) critical plant and equipment and for each item, specify:</p> <ul style="list-style-type: none"> <li>• An inspection regime to monitor its performance / effectiveness</li> <li>• Maintenance requirements to ensure CRRRF meets its environmental obligations.</li> </ul> <p>Critical plant and equipment may include apparatus to control dust, noise and stormwater treatment.</p>	<b>Status: Open</b> <p>There has been no action taken to close out this recommendation.</p>

## **Appendix F – Site inspection photographs**

## Appendix F – Site Inspection Report

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Photo 1: Cleanaway ResourceCo

- Street frontage.
- Security fencing and landscaping evident.



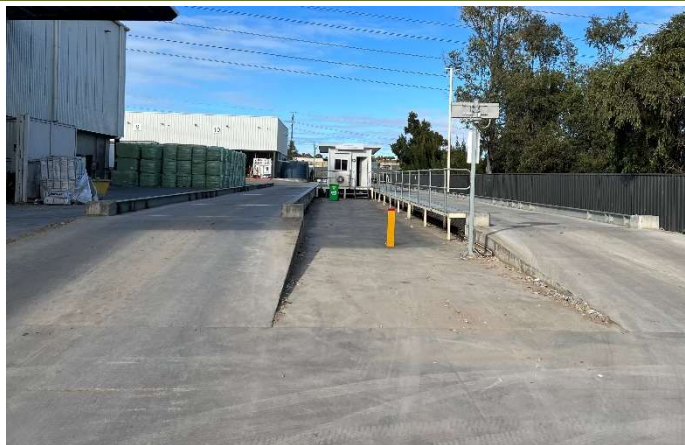
Photo 2: Visitor carparking provided



Photo 3: Truck wash facility operational



Photo 4: Weigh bridge and gate house





Photos 5 and 6: Gatehouse:

- controls incoming vehicles confirming prequalified customers
- records tonnages
- undertakes visual inspection of load using cameras.



Photo 7: Streetsweeper servicing the forecourt area along the western boundary

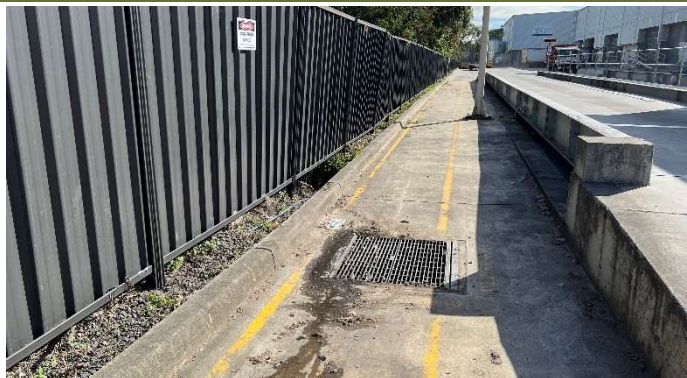


Photo 8: Ongoing clean-up of baler packaging area



Photo 9: Western boundary fence.

- Nominal waste litter observed
- Drains labelled "This pit drains to the Georges River"
- Landscaping along fence line incomplete





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Photo 10: Western forecourt - Rodent baits



Photo 11 and 12: Eastern boundary

- Upgrades to site drainage progressing.
- CRRRF advised that site is likely to be resealed prior to January 2023



Photo 13: Waste receivals hall

- Unloading of waste monitored by CRRRF.



Photo 14: Sorted wastes in designated bays.



Photo 15: Low CV PEF storage



Photo 16 and 17: Tyres, paints and gas cylinders hand picked out of the waste stream and stored in designated areas.



Photo 18: High CV PEF baled and stored within a designated area on the western forecourt.





Photo 19: Ongoing clean-up of dust on horizontal surfaces within the waste receives hall



Photo 20: Control room within the Waste hall:

- Controllers monitor waste streams
- Cameras are used to monitor waste for unauthorised materials such as asbestos
- Cameras are used to monitor sorting process for excess dust generation

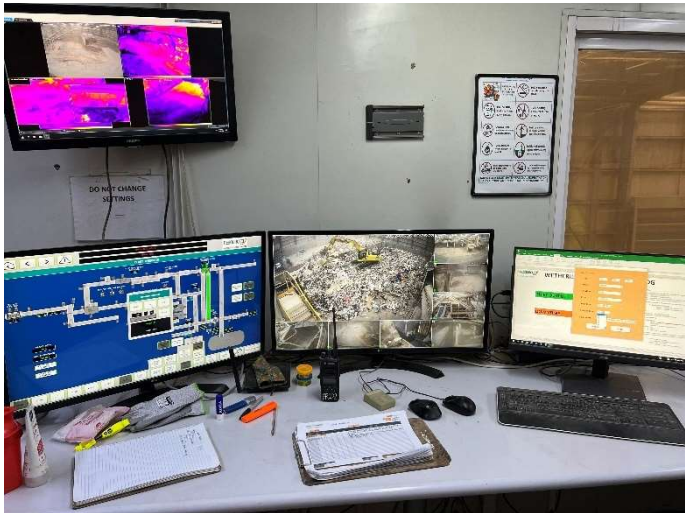


Photo 21: MEX system

- Sample sighted of Preventative Maintenance Order #217 - for Stormwater system, drain filters, monthly check and clean.

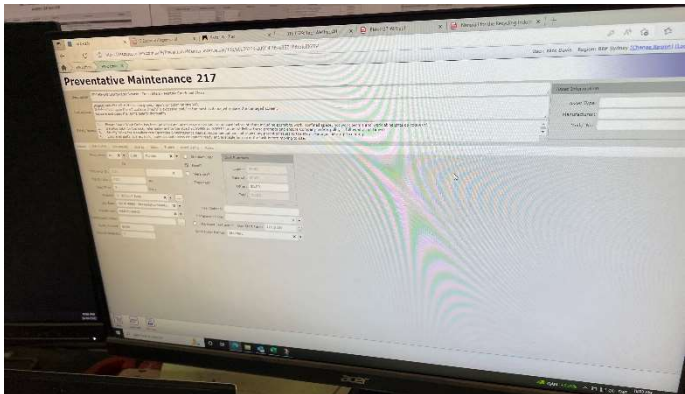


Photo 22: Office recycling





Photo 23: Western forecourt area – spill kits readily accessible.



Photo 24: Chemical storage and workshop

- Double skinned bulk diesel tank and bunded refuelling area
- Packaged chemicals and IBCs stored on pallet bunds
- Spill kits available



Photo 25: Chemical storage and workshop


- Small quantity of Class 2 paint spray cans stored in Class 3 cabinets.
- Oxygen cylinder cage incorrectly labelled with Class 3 diamond

Site personnel undertook to correct these minor inconsistencies with the Australian Standard.





OptimE Pty Ltd Report: 2210.01

No:	Revision:	Approved:	Signature	Date:
Rev 0	Final report	M Pignatelli		25/10 2022

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