



Alternative fuel for a sustainable future

Response to Recommendations and Opportunities for Improvement

Cleanaway ResourceCo RRF

**Independent Environmental Audit Report,
August 2022**

Contents	Page
Background	3
Introduction	3
Management Overall Response to Audit Findings	3
Response to Recommendations	4
Response to Improvement Opportunities	8

Terms of Reference

IEA	Independent Environmental Audit
EPA	Environmental Protection Agency
DPE	Department of Planning and Environment
OEMP	Operational Environmental Management Plan
LMP	Landscaping Management Plan
EfWMP	Energy from Waste Management Plan
HSEQ Manager	Health Safety Environment and Quality Manager
MEX	MEX Maintenance Software System

1. Background

In compliance with the *condition C12 and C13* of the development consent SSD 7256, Cleanaway ResourceCo Resource Recovery Facility (CRRRF) commissioned an Independent Environmental Audit (IEA). This IEA covered the operational period from February 2019 to July 2022 and was conducted in accordance with the IEA program developed by Lead Auditor Mr. Maurice Pignatelli of OptimE. The Lead Auditor competency and the proposed IEA program was approved and endorsed by the Department of Planning as suitable for this audit process.

2. Introduction

This document highlights Cleanaway ResourceCo's official response to the recommendations and improvement opportunities that have been identified to address all non-compliances in the IEA report. This response also outlines the scheduled timeframes and work plans to implement the accepted recommendations.

3. Management Overall Response to Audit Process and Recommendations

The audit process was conducted in an efficient and professional manner that allowed sufficient engagement between the auditor and auditee regarding the recommendations raised. Management agrees to the IEA report's proposed recommendations and opportunities for improvement and will make all necessary resources available for the successful implementation of actions plans in the timeframes outlined in this response.

RESPONSE TO RECOMMENDATIONS

R - #	Reference	Skytrust	Recommendation	Management Decision and Comments	Work Plan	Responsible Personnel	Estimated completion date
2022 R-01	Section 3.4.1 Table A1 Condition B32	475670	Updating the AQMP Update the Air Quality Management Plan to document: <ul style="list-style-type: none"> the additional reasonable and feasible dust controls implemented by CRRRF environmental air monitoring processes environmental air monitoring performance targets record keeping.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	The requested information will be inserted into the updated Air quality management plan.	HSEQ Manager	01/07/2023
2022 R-02	Section 3.4.4 Table A1 Condition B23 Table A3, WMP Section 3.4	475671	Surface water monitoring 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.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	Currently under review with GHD. Water management plan to be updated once review is completed.	HSEQ Manager	01/07/2023
2022 R-03	Table A1 Condition C7	475675	Revision of Strategies, Plans and Programs Review and revise the OEMP and supporting management plans to address the findings of this audit, as per Condition C7 of the Approval.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	Recommendations from this audit go into the updated OEMP.	HSEQ Manager	01/07/2023
2022 R-04	Table A1 Condition C8	475676	Annual Review 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.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	To be prepared and submitted with detail from the final audit results.	HSEQ Manager	01/04/2023
2022 R-05	Table A1 Condition 46 Appendix E	475651	Web-page information Ensure all information required by Condition C14 is publicly available on the facility's webpage	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	OEMP and sub plans are already uploaded on www.resourceco.com.au . All other required files to be identified and uploaded.	HSEQ Manager	01/05/2023

R - #	Reference	Skytrust	Recommendation	Management Decision and Comments	Work Plan	Responsible Personnel	Estimated completion date
2019 R-08	Table A1 Condition B46 Appendix E	475649	Landscaping 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. This was addressed in December 2022 and closed.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	Landscaping to be installed in accordance with the landscaping management plan.	HSEQ Manager	Closed
2019 R-10	Section 3.10	475659	Audit report to the EPA Consult with the EPA for a revised date for submission of an audit report detailing the outcomes of an OEMP audit. An audit of the OEMP has been undertaken. Submission to be finalized by the 01/07/2023.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	EPA to be contacted for a revised date for the submission of the OEMP audit.	HSEQ Manager	Closed
2019 R-12	Section 3.10	475660	Quackers Consider the incorporation of the following noise control into the OEMP, as specified in the statement of commitments: <ul style="list-style-type: none">Plant based at the site will be fitted with "quacker" style reversing alarms.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	OEMP to be updated to include the quacker style reversing alarms	HSEQ Manager	01/07/2023
2019 R-14	Section 3.10	475666	EfWMP Calculation Update the EfW calculation method in the EfWMP, so it is consistent with the calculation method approved by the EPA.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	The updated EFW calculation with be inserted into the updated Energy from waste plan	HSEQ Manager	01/07/2023
IO - #	Reference		Recommendation				
2022 IO-02	Section 3.4.1 Table A1 Condition B32	475704	Environmental Air Quality Monitoring 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.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	Business will investigate real time dust monitors to replace dust deposition gauges.	HSEQ Manager	01/07/2023
2022 IO-03	Table A3 OEMP Section 5.3	475706	Site-specific Environmental Inductions Improvement opportunity: 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.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	The current site environment induction has been updated.	HSEQ Manager	CLOSED

R - #	Reference	Skytrust	Recommendation	Management Decision and Comments	Work Plan	Responsible Personnel	Estimated completion date
2019 IO-02	Section 3.10	475667	Customer records - incoming waste Maintain a controlled register of all pre-qualified incoming customers including pertinent information such legal entity (ABN/ACN number) and waste facility license number.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	Register to be updated to include EPA license number. Register has been updated and added to site safety base. This has now been updated.	HSEQ Manager	CLOSED
2019 IO-04	Section 3.10	478610	Waste Monitoring Program 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.	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	To be added as an appendix into the updated OEMP.	HSEQ Manager	01/07/2023
2019 IO-06	Appendix E	475670	Update the OEMP Revise the OEMP to include: <ul style="list-style-type: none"> • <u>Explicit environmental responsibilities and authorities for key CRRRF personnel</u> • <u>Procedures to inform the local community of CRRRF operations, as required.</u> • <u>Consistency in documentation regarding commitment to notify of DPE, in the event of an environmental incident or emergency.</u> • <u>The record keeping requirements of the EPL (Condition M1.2 and M1.3) should be referenced in the OEMP.</u> • <u>In its objectives, include:</u> <ul style="list-style-type: none"> ○ <u>A commitment to modern technologies through-out the life of the plant.</u> ○ <u>Extent to which it encourages and facilitates community participation in the recycling of building and construction waste.</u> • <u>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</u> Improved guidance on how primary legislation referenced in the OEMP applies to operations	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	The OEMP revision to include the requested information.	HSEQ Manager	01/07/2023
2019 IO-07	Appendix E	478611	Legislation The following Sections of the Protection of the Environment Operations Act 1997 and their obligations should be referenced in the OEMP: <ul style="list-style-type: none"> • <u>Section 120 - Pollution of waters</u> • <u>Section 129 – Potentially offensive odour</u> 	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	The requested information will be inserted into the updated OEMP.	HSEQ Manager	01/07/2023

R - #	Reference	Skytrust	Recommendation	Management Decision and Comments	Work Plan	Responsible Personnel	Estimated completion date
2019 IO-09	Table A1 Condition A23 Appendix E	478614	Maintenance of plant and equipment The OEMP should identify (or reference documents which identify) critical plant and equipment and for each item, specify: <ul style="list-style-type: none"> <u>An inspection regime to monitor its performance / effectiveness</u> <u>Maintenance requirements to ensure CRRRF meets its environmental obligations.</u> <u>Critical plant and equipment may include apparatus to control dust, noise, and stormwater treatment.</u> 	CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION	A procedure as an appendix to be prepared for the updated OEMP	HSEQ Manager	01/07/2023