



Table 1. Annual Review

Name of operation	CLEANAWAY RESOURCECO
Name of operator	CLEANAWAY RESOURCECO RRF PTY LTD
Development consent / project approval #	SSD 7256
Name of holder of development consent / project approval	CLEANAWAY RESOURCECO RRF PTY LTD (FORMERLY KNOWN AS RESOURCECO RRF PTY LTD)
Annual Review start date	01/01/2024
Annual Review end date	31/12/2024
<p>I, Ben Whitehouse certify that this audit report is a true and accurate record of the compliance status of CLEANAWAY RESOURCECO RRF PTY LTD] for the period of the 2024 Calendar year and that I am authorised to make this statement on behalf of Cleanaway ResourceCo RRF PTY LTD</p> <p><i>Note.</i></p> <p>a) <i>The Annual Review is an ‘environmental audit’ for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p>b) <i>The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Name of authorised reporting officer	Ben Whitehouse
Title of authorised reporting officer	HSEQ Advisor
Signature of authorised reporting officer	
Date	

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Statement of compliance

Table 2. Statement of compliance

Were all conditions of the relevant approval(s) complied with?	
DC # SSD 7256	NO

If any conditions of the relevant approvals were not complied with, the non-compliances should be identified by completing **Table 3**. The terms 'partial compliance', 'partial non-compliance' or similar should not be used in the Statement of Compliance. An operation is either compliant or non-compliant.

Table 3. Non-compliances

Relevant approval	Condition #	Condition description (summary)	Compliance status	Where addressed in Annual Review
DC #SSD 7256	B3	All processed and unprocessed waste must be stored within the building on the site.	Non-compliant	Page 9

Compliance status key for Table 3

Risk level	Colour code	Description
High	Non-compliant	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence
Medium	Non-compliant	Non-compliance with: <ul style="list-style-type: none"> potential for serious environmental consequences, but is unlikely to occur; or potential for moderate environmental consequences, but is likely to occur
Low	Non-compliant	Non-compliance with: <ul style="list-style-type: none"> potential for moderate environmental consequences, but is unlikely to occur; or potential for low environmental consequences, but is likely to occur
Administrative non-compliance	Non-compliant	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g., submitting a report to government later than required under approval conditions)

Introduction

Cleanaway ResourceCo RRF Pty Ltd (Cleanaway ResourceCo) is the operator of the Wetherill Park Resource Recovery Facility (the facility) located at 35-37 Frank Street, Wetherill Park. The facility was built in 2017 and has operated continuously ever since predominantly on the basis of continuing use rights and two development consents issued under the NSW Environmental Planning and Assessment Act 1979 (EP&A Act). The site was previously owned by SIMS Group Australia Holdings Limited and operated under Environmental Protection Licence (EPL) 2950. This EPL was surrendered on 03rd December 2015. The facility operates on Mondays-Fridays with the potential to run on Saturdays and Sundays if required. The site is licenced to operate 24 hours a day.

The facility comprises of a waste and resource management operation which processes relevant waste materials to recover products including aggregates, metal, timber and to manufacture solid recovered fuel (Processed Engineered Fuel or PEF) and a baling process to ready material for export. The operational infrastructure on site includes three material shredders, four magnets, two air separators, an optical sorter, screens and many conveyors.

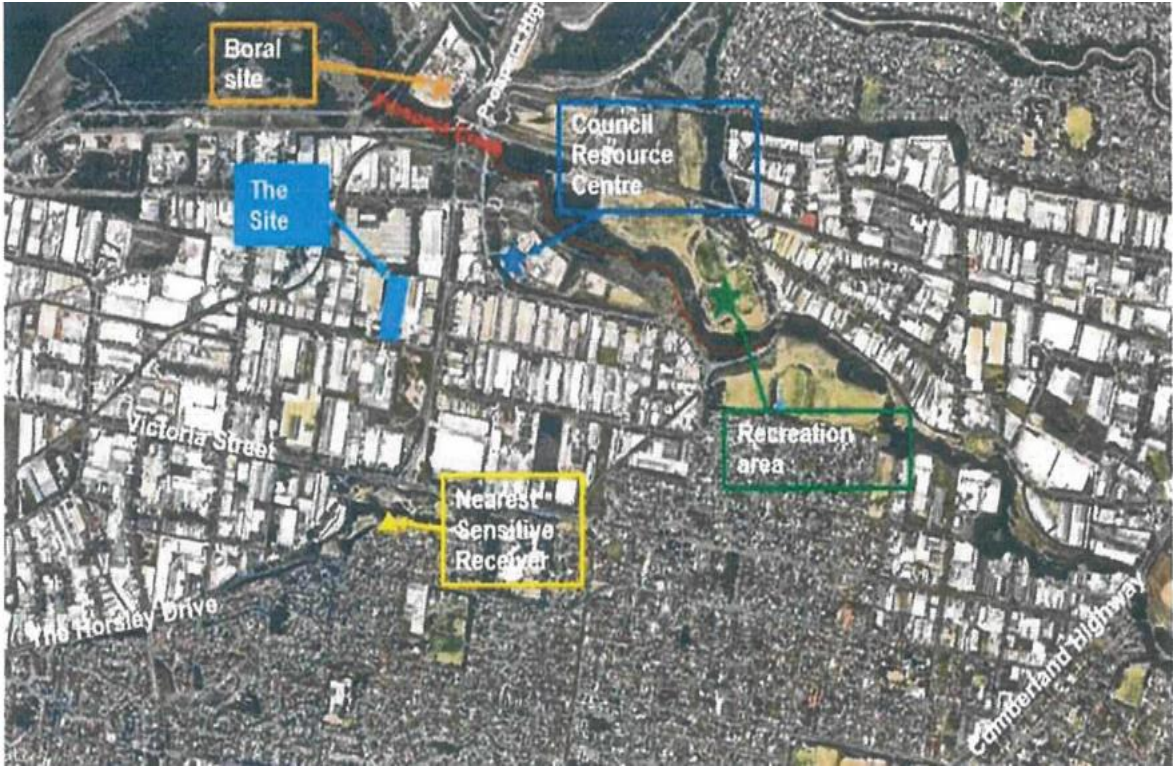


Figure 1: Nearest Site Sensitive Receivers

Table 4. Site Contacts

Name	Title/Position	Contact Details (phone/email)
Sanderan Govender	General Manager	0499 525 558 Sanderan.Govender@resourceco.com.au
Jake Zerafa	Operations Manager	0457 347 680 Jake.Zerafa@resourceco.com.au
Ben Whitehouse	HSEQ Advisor	0401 927 740 Ben.whitehouse@resourceco.com.au

Operations Summary

This chapter summarises the production and processing operations during the 2024 reporting period. Historic production levels are also provided for completeness.

Incoming Waste

During the 2024 reporting period, Cleanaway ResourceCo accepted in 73,452 tonnes of material. The waste received on site comes from either commercial and industrial or construction and demolition waste customers. The breakdown of the waste received is as below:

Waste Type	Amount Received (tonnes)
Commercial & Industrial	45486
Construction & Demolition	27966
Total	73452

Outgoing Products

During the 2024 reporting period, Cleanaway ResourceCo exported 71,469 tonnes of material. A breakdown on the tonnes exported from site can be found below:

Product	Amount Exported (tonnes)
Fines	11224
Aggregates	3349
Processed Biomass Fuel	51256
Non-conforming waste	5640
Total	71,469

Actions from the previous Annual Review and Independent Environmental Audit

The 2023 annual environmental review was submitted to the Department of Planning, Housing and Infrastructure (formally Department of Planning and Environment (DPE)) on 21 February 2024 with DPE completing their assessment 8th May 2024. The Department considered the review to generally satisfy the reporting requirements of the consent and the NSW Planning Annual Review Guideline (October 2015).

Note: The approval of the Annual Report by the Department is not an endorsement of the compliance status of the project.

Table 5 – Actions from the previous Annual Review and Independent Environmental Audit

Action required from previous Annual Review	Requested by	Action taken by the Operator	Where discussed in Annual Review
EPL 5-year review	EPA	This is still to be completed as EPA will not update noise limits until DPHI has addressed them in a modification to the existing development approval. This is set to be addressed in the 2025 reporting period.	Pages 18 & 19
OEMP and Sub-documents Update	DPE	OEMP and sub-documents were sent to DPE and approved in January 2024.	Not discussed – Action Complete
Action required from Independent Environmental Audit	Requested by	Action taken by the Operator	Where discussed in Annual Review
Updating Air Quality Management Plan	DPE	Updated to the satisfaction of the Secretary.	Not discussed – Action Complete
Surface Water Monitoring	DPE	This has been held up due to unfavourable weather conditions delaying storm water sampling on site and is expected to be finalised and the Water Management plan to be completed by December 2024.	Pages 23 - 26
Revision of Strategies, Plans and Programs	DPE	Strategies, Plans and Programs revised to the satisfaction of the Secretary.	Not discussed – Action Complete
Landscaping	DPE	Landscaping Management Plan was submitted to the satisfaction of the Secretary.	Not discussed – Action Complete
Audit Report to the EPA	DPE	OEMP audit was sent to the EPA in 2022.	Not discussed – Action Complete
Environmental Air Monitoring	DPE	Dust deposition gauges have been replaced with the SiteHive Hexanode system.	Not discussed – Action Complete
Update the OEMP	DPE	OEMP has been updated to the satisfaction of the Secretary.	Not discussed – Action Complete
Legislation	DPE	OEMP has been updated to the satisfaction of the Secretary.	Not discussed – Action Complete

Table 6. Operational Compliance

A2	The Applicant, in acting on this consent, must carry out the development in accordance with the: (a) Development Application (SSD 7256). (b) EIS. (c) RTS. (d) conditions in Schedule 2. (e) development layout plans and drawings listed at Appendix 1; and (f) the Management and Mitigation Measures as identified in Appendix 2.	Refer to table 7.
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.
A6	The Applicant must not receive or process on the site more than 250,000 tonnes per annum (t/a) of waste, as defined in this consent.	The 250,000tpa limit was not exceeded during the review period.
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	CRRRF maintains a pre-qualified customers register.

	from Waste Policy Statement.	
A11	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.	Not applicable
A12.	The Applicant must ensure that all license's, 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 license's, permits or approval/consents.	The Environment Protection Licence has been maintained over the reporting period.
A23	The Applicant must ensure that all plant and equipment used for the development is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	All plant and equipment are maintained and operated to the relevant equipment standards.
PART B:		
B1	The Applicant must: (a) implement auditable procedures to: i. screen incoming waste loads. ii. ensure that waste is not accepted at the site that is not permitted by the EPL; and 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. (b) 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 recognize and manage any hazardous or other prohibited wastes such as asbestos.	Cleanaway ResourceCo (CRRRF) issue a customer pre-qualification document prior to its customers first load and after doing an onsite audit of the facility. Cleanaway ResourceCo also has an incoming waste inspection form completed by traffic control staff documenting the make-up of all loads tipped on site. After the customers initial loads to the facility, Cleanaway ResourceCo provide documented feedback of any materials that are not accepted for processing and remove or reject any unpermitted waste. CRRRF continue to collaborate with its customers to achieve the right material mix. The facility has Standard Operating procedures to identify and manage unauthorised materials entering the site including: <ul style="list-style-type: none"> • Waste tracking through weighbridge dockets with description of the type of waste tipped on site. • Screening incoming wastes during truck tipping visually. • Managing fibrous cement in incoming material including the identification and testing of potential asbestos waste, and its management. • Quarantining contaminated materials to designated areas if not reloaded onto the offending truck. • Picking unacceptable waste from the waste pile • A training program has been implemented, including VOCs for heavy equipment.
B2	Waste must be always secured and maintained within designated waste storage areas and must not leave the site onto neighbouring public or private properties.	A piece of plastic wrapping was identified being blown off site by western neighbours. This was communicated to CRRRF by email and the waste was quickly collected. The plastic wrapping had been blown onto the street during a significant wind event, as such CRRRF employed the use of a road sweeper during the wind event to prevent further escape of debris.
B3	All processed and unprocessed waste must be stored within the building on the site. Processed, wrapped, and	Plastic wrapped pallets of shredded clothing were stored exterior to the facility, as identified by HSEQ

	baled PEF may be stored in the area designated on the approved plans in Appendix 1 for the outdoor storage of PEF.	staff. This was an error by an inexperienced forklift operator and was rectified promptly. The forklift operator also underwent training to ensure they were aware of their responsibilities under both the EPL and development approval. This plastic wrapped pallet was placed as part of an unloading process for certain types of incoming material. Due to logistical challenges this material is required to be unloaded outside the facility and moved into the shed over a period of days. This material is generally product destruction material and is completely wrapped in plastic and therefore proposes no environmental risk.
B4	All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste.	Waste is only directed by premises lawfully permitted to accept the waste. Records are kept of all loads.
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.	All waste streams received at the site during the review period complied with CRRRF's EPL requirement.
B6.	The Applicant must record the amount of waste (in tonnes) received at the site daily.	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.
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.	Waste classification data is recorded on the WARRP monthly reports to the EPA.
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.	The Energy from Waste Management Plan (February 2018, reviewed May 2023) is currently in use.
B10	From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development.	Waste Monitoring Program in use. Document reviewed in March 2023.
Construction Waste Management		
B11	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 Secretary. The plan must form part of the CEMP required by Condition C1 and must: (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and (b) be implemented for the duration of construction works.	Condition covered in construction phase of project. Project is currently in operational phase.
Pests, Vermin and Noxious Weed Management		
B12	The Applicant must: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and	Bug Stop Industrial Extermination Pty Ltd is engaged to undertake fortnightly inspections of tamper proof rodent stations. A vendor is engaged to do a clean-up of gardens, housekeeping (litter), and weeding on a regular basis.

- (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.

Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.

Imported Soil

B13	<p>The Applicant must:</p> <p>(a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site;</p> <p>(b) keep accurate records of the volume and type of fill to be used; and</p> <p>(c) make these records available to the Department upon request.</p>	The site does not currently undertake any filling activities.
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Erosion and Sediment Control

B14	<p>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 <i>Managing Urban Stormwater: Soils and Construction Guideline</i> and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.</p>	The site is not currently undergoing any earthworks. This section was complied with during the construction phase of the project.
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B15	<p>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>	This section has been complied with.
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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 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 Vol. 1</i> (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>Design and installation</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> <p>Operation</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).</p>
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B20	<p>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.</p>	Stormwater drains/pits on the site are labelled with the message; "This pit drains to the Georges River" with 100mm yellow lettering.
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B21	<p>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</p>	<p>The Leachate Management Plan was implemented prior to the commencement of operation to the satisfaction of the Secretary.</p> <p>In order to contain fire services water onsite in the</p>
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	<p>baling and wrapping area. The leachate system must:</p> <p>be designed by a suitably qualified and experienced person(s) in consultation with FRNSW.</p> <p>provide a management protocol for leachate and firewater.</p> <p>control leachate and firewater so that they do not mix with any stormwater on the site; and</p> <p>include water quality monitoring to determine the performance of the leachate management system.</p>	<p>event that this stockpile fire protocol is required to be implemented, a shut off valve has been installed in the 675 mm site stormwater discharge to the 900 mm stormwater pipe. This will prevent fire water entering the stormwater pipe. The valve is automated and will automatically close when the firefighting sprinkler system is activated. Upon activation, the shut off valve is checked to ensure that it has closed, and if for any reason the shut off valve doesn't close automatically, then the valve will be manually closed. The valve is only able to be manually re-opened to allow water discharge after this is sequenced.</p> <p>The waste materials received into the site is dry in nature and is all stored under cover in the manufacturing building. There are 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 grades to a concrete valley within the receiving area which will contain leachate.</p>
B22	<p>Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to the satisfaction of the Secretary. The Water Management Plan must:</p> <ol style="list-style-type: none"> (a) form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6. (b) be prepared in consultation with DPI. (c) detail water use, metering, disposal, and management on-site. (d) detail the water licence requirements for the development. (e) detail the management of wastewater streams on-site, including leachate and firewater. (f) contain a Surface Water Management Plan, including. <ol style="list-style-type: none"> (i) a program to monitor: <ul style="list-style-type: none"> • surface water flows and quality; and • surface water storage and use. (ii) sediment and erosion control plans. (iii) surface water impact assessment criteria, including trigger levels for investigating potential adverse surface water impacts; and (iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria. 	<p>The Water Management Plan was implemented prior to the commencement of operation to the satisfaction of the Secretary and has been updated in 2022 to be in line ISO 9001 requirements.</p>
B23	<p>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.</p>	<p>The water management plan is currently being reviewed following completion of the stormwater management review. CRRRF expects the plan to be updated and submitted to DPHI for review and approval prior to the completion of the 2025 reporting period.</p>
B24	<p>The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary.</p>	<p>Operations is permitted 7 days per week, 24 hours per day.</p>
B29	<p>The Applicant must:</p> <ol style="list-style-type: none"> (a) implement best practice, including all reasonable and feasible noise management and mitigation 	<p>Cleanaway ResourceCo has the following noise management practices in place:</p>

	<p>measures to prevent and minimise operational, low frequency and traffic noise generated by the development.</p> <p>(b) minimise the noise impacts of the development during adverse meteorological conditions.</p> <p>(c) Always maintain the effectiveness of any noise suppression equipment on plant and ensure defective plant is not used operationally until fully repaired; and</p> <p>(d) regularly assess noise emissions and relocated, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.</p>	<ul style="list-style-type: none"> • Completely indoor facility. • “Quacker” reverse alarm on all mobile plant in place of reverse beepers. • Personal protective equipment. • Enclosed cabins on mobile plant. • Enclosed control room/picking stations. <p>All current noise mitigation measures are maintained by Cleanaway ResourceCo’s maintenance staff.</p> <p>There has been no noise related issued identified in the project for the review period.</p>
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 <i>EPA’s Approved Methods for Sampling of Air Pollutants in New South Wales</i>.</p>	<p>A weather station is located on the roof of an awning at the south-eastern corner of site (Davis Vantage Vue model).</p>
B32	<p>The Applicant must implement all reasonable and feasible measures to minimise dust generated during demolition, earthworks, construction, and operation of the development.</p>	<p>The site has in place an Air Quality Management Plan for managing dust.</p> <p>No dust complaints were received during the reporting period.</p>
B34	<p>Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Secretary. The AQMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6. The AQMP must:</p> <p>(a) detail and rank all emissions from all sources of the development, including particulate emissions.</p> <p>(b) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators.</p> <p>(c) identify the control measures that that will be implemented for each emission source; and</p> <p>(d) nominate the following for each of the proposed controls:</p> <p>(i) key performance indicator.</p> <p>(ii) monitoring method.</p> <p>(iii) location, frequency and duration of monitoring.</p> <p>(iv) record keeping.</p> <p>(v) complaints register.</p> <p>(vi) response procedures; and</p> <p>(vii) compliance monitoring.</p>	<p>The Air Quality Management Plan was implemented prior to the commencement of operation to the satisfaction of the Secretary.</p>
B35	<p>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.</p>	<p>The Air Quality Management Plan (July 2017) has been implemented.</p> <p>The site has in place an Air Quality Management Plan that was updated in May 2023 and has been implemented on site.</p> <p>During the 2024 reporting period there has been no complaints related to dust.</p> <p>The site has implemented a real-time dust monitor (Site Hive). The SiteHive Hexanode is a multi-sensor monitoring device that delivers live, continuous information on environmental aspects. It provides real-time data on noise and dust, as well as rich contextual information including directional sound maps, images, sound recordings and weather.</p>
B36	<p>The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as</p>	<p>Nil odour issues have been identified. CRRRF received one complain of odour in the 2024 reporting</p>

	defined in the POEO Act).	period. This was investigated and it was determined that the CRRRF was not the source of the odour.
B39	Prior to the commencement of operations, the Applicant must provide forty-two on-site parking spaces for visitors and staff. Parking areas are to be constructed in accordance with the latest version of AS 2890.1.	Forty-two car spaces are provided on site.
B41	<p>The Applicant must ensure:</p> <ul style="list-style-type: none"> (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. (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 AUSTRROADS guidelines. (c) the development does not result in any vehicles queuing on the public road network. (d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site. (e) all vehicles are contained on site before being required to stop. (f) all loading and unloading of waste and other materials are conducted on-site. (g) all vehicular entries and exits must be made in a forward direction. (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 (i) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, always. 	<p>The development did not result in any vehicles queuing on the public road network.</p> <p>Heavy vehicles and bins associated with the development were not parked on local roads or footpaths in the vicinity of the site.</p> <p>Vehicles were contained on site before being required to stop.</p> <p>Loading and unloading of waste and other materials is conducted on-site.</p> <p>Vehicular entries and exits were made in a forward direction.</p> <p>Trucks entering or leaving the site with loads had their loads covered and do not track dirt onto the public road network.</p>
B42	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored, and managed strictly in accordance with all relevant Australian Standards.	On site, except for the bulk diesel tank, other hazardous substances are minor in quantity and stored in appropriate cabinets. The diesel tank is double skinned, and its refuelling area is appropriately bunded.
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.	This condition has been complied with.
B48	<p>The Applicant must ensure the lighting associated with the development:</p> <ul style="list-style-type: none"> (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. 	The light installation certificate reported the lighting had been completed in accordance with BCA2016, AS1680.0-2009 and AS2293.1-2005.
PART C:		
C4	<p>The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Secretary. The OEMP must:</p> <ul style="list-style-type: none"> (a) be submitted to the Secretary for 	<p>OEMP has been reviewed and approved by DPE on 11/01/2024.</p> <p>This was updated to bring it in line changes made from the Independent Environmental audit and current quality control guidelines.</p>

	<p>approval prior to the commencement of operation.</p> <p>(b) be prepared by a suitably qualified and experienced expert.</p> <p>(c) provide the strategic framework for environmental management of the development.</p> <p>(d) identify the statutory approvals that apply to the development.</p> <p>(e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development.</p> <p>(f) describe the procedures that would be implemented to:</p> <p>(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development.</p> <p>(ii) receive, handle, respond to, and record complaints.</p> <p>(iii) resolve any disputes that may arise.</p> <p>(iv) respond to any non-compliance.</p> <p>(v) respond to emergencies; and</p> <p>(g) include the following environmental management plans:</p> <p>(i) Energy from Waste (see Condition B8);</p> <p>(ii) Air Quality (see Condition B34);</p> <p>(iii) Water (see Condition B22); and</p> <p>(iv) Leachate (see Condition B21).</p>	<p>This review was conducted by the HSEQ Manager and approved the DPE.</p> <p>This is now with the EPA to be included into the EPA license.</p> <p>The following documents were updated and sent to the EPA for inclusion into the license.</p> <ul style="list-style-type: none"> • Air Quality Management Plan (version 2, November 2023). • Energy from Waste Management Plan (version 7, November 2023) • Operational Environmental Management Plan (version 6, November 2023) • Waste monitoring program (Version1 01.03.2023) <p>The EPA is yet to update the EPL to include the above documents at time of annual environmental review.</p>
C5	<p>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.</p>	<p>OEMP has been reviewed and approved by DPE on 11/01/2024. The site is managed in accordance with the OEMP.</p>
C7	<p>Within three months of:</p> <p>(a) approval of a modification.</p> <p>(b) approval of an annual review under Condition C8.</p> <p>(c) submission of an incident report under Condition C10; or</p> <p>(d) completion of an audit under Condition C12,</p> <p>the Applicant must review, and if necessary, revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</p>	<p>Review of plans</p> <p>All sub-plans of the OEMP have been reviewed and are up to date with the exception of the Water Management Plan. CRRRF expects the water management plan to be completed and approved by the end of the 2025 reporting period.</p>
C8	<p>Each year, the Applicant must review the environmental performance of the development to the satisfaction of the Planning Secretary.</p>	<p>Annual reviews</p> <p>This review is for the 2024 reporting period.</p>
C9	<p>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.</p>	<p>01/05/2024 - DPHI was notified of a fire related incident in the fixed plant by CRRRF. Despite the incident posing no immediate off-site impacts, the DPHI were informed of the incident.</p>
C10	<p>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.</p>	<p>Report was submitted within seven days of the incident.</p>
C11	<p>The Applicant must provide regular reporting on the environmental performance of the development on its</p>	<p>Latest version of documents available on ResourceCo website.</p>

	website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	
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> <ul style="list-style-type: none"> (a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Planning Secretary. (b) include consultation with the relevant agencies. (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). (d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and (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>Note: <i>This audit team must be led by a suitably qualified auditor and include relevant experts in any other fields specified by the Planning Secretary.</i></p>	<p>There is one outstanding action relating to the previous IEA. This is the update of the Water Management Plan. This is expected to be completed by the end of the 2025 reporting period.</p> <p>CRRRF has engaged an independent consultant to conduct the IEA for 2022-2025. This audit will be commissioned in May of 2025 and the report completed by the end of July 2025.</p>
C13	<p>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>	<p>This condition has been complied with.</p>
C14	<p>C14. The Applicant must:</p> <ul style="list-style-type: none"> (a) make copies of the following publicly available on its website: <ul style="list-style-type: none"> (i) the documents referred to in Condition A2. (ii) all current statutory approvals for the development. (iii) all approved strategies, plans and programs required under the conditions of this consent. (iv) 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. (v) complaints register updated monthly. (vi) the annual reviews of the development. (vii) any independent environmental audit of the development and the Applicant's response to the recommendations in any audit. (viii) any other matter required by the Secretary; and (b) keep this information up to date, to the satisfaction of the Secretary. 	<p>All required documents are available on the ResourceCo website at the following link:</p> <p>https://resourceco.com.au/Documents/</p>

Next reporting period

Next review is 01/01/2025 – 31/12/2025.

Environmental performance

This section reports performance against the environmental performance conditions in Development Consent No. 7256. It is divided into sections based on the environmental matters in the consents and comprises a table comparing approved criteria/EIS predictions and performance during the reporting period. This table also highlights any proposed actions to be taken by management in response to potential deviations from the approval criteria or EIS predictions.

Under SSD7256 Cleanaway ResourceCo has the following management plans that have been approved by DPE:

- Operational Environmental Management Plan
- Energy from Waste Management Plan
- Air Quality Management Plan
- Waste Monitoring Program

Cleanaway ResourceCo is also currently working on an update to the Water Management Plan to incorporate changes required by the Independent Environmental Audit and EPA. We expect the update to be finalised and sent to DPE for approval from the Secretary, following engagement with the EPA, by midway through the 2025 reporting period.

Table 7. Environmental performance

Aspect	Approval criteria / EIS prediction	Performance during the reporting period	Trend/key management implications	Implemented/proposed management actions
Objectives	<ol style="list-style-type: none"> 1. To provide a long term, fully licensed Waste and Resource Management facility capable of recycling mixed Construction and Demolition waste and dry Commercial and Industrial waste. 2. To protect the health and safety of site workers and the general public. and ensure business viability by compliance with relevant legislation, standards and regulating authorities. 3. To ensure site operations do not significantly impact on potential environmental receptors and comply with environmental legislation. 4. To ensure that new technologies are implemented in relation to resource recovery and environmental management of the Waste and Resource Management Facility throughout its life. 5. To encourage and facilitate community participation in the recycling of building and construction waste. 6. To protect the surrounding environment through the implementation and management of environmental controls and contingency measures. 7. To operate the Waste and Resource Management facility in a manner which is sympathetic to the amenity of the area in which it is located. 	<ol style="list-style-type: none"> 1. Nil issues identified during the reporting period. 2. There was a localised fire on one of the magnets resulting in a site evacuation. 3. The site received 2 complaints from the community. Both were investigated and appropriate actions taken as required. Community complaints are discussed in Table 9 of this document. 4. Nil issues identified during the reporting period, 5. Site tours are conducted for interested parties. 6. The site complies with the Air Quality Management Plan Wetherill Park 2018. This was updated in May 2023. 7. The site operates with the Operational Management plan and subsidiary documents. 	Nil	Continued review of dust management practices. Further investigation into additional suppression techniques and technologies.

Odour	The predicted odour impacts at nearby sensitive receptors is as below: Receptor	Predicted peak odour concentration (OU/m ³)	Impact Assessment Criterion (OU/m ³)	Complies (Yes/No)	One odour complaint was received on site during 2024 reporting period. This was investigated and the site was determined not to be the source of the odour.	Nil.	Continue operation as per EPL and OEMP
	R1	<0.1	2.0	Yes			
	R2	<0.1	2.0	Yes			
	R3	<0.1	2.0	Yes			
	R4	<0.1	2.0	Yes			
Dust and Particulate Matter	The EPA Approved Methods specifies air quality assessment criteria for assessing impacts from dust generating activities. These criteria are consistent with the National Environment Protection Measures for Ambient Air Quality (NEPC, 1998). Table 3-2 of the Wilkinson Murray Report summarises the air quality goals for dust and particulate matter which are relevant to this assessment.				No dust complaints were received during the 2024 reporting period.	Nil.	Dust management review to continue during 2025 reporting period.
	Pollutant	Averaging Period	Impact	Criteria			
	Total suspended particles	Annual	Total	90ug/m ³			
	Particulate Matter (PM10)	Annual 24 Hour	Total Total	30ug/m ³ 50/ug/m ³			
	Deposited Dust (DD)	Annual Annual	Total Total	4g/m ² /month 2g/m ² /month			
Noise	The appropriate daytime assessment criterion is LAeq,15hr 60dBA at 1 metre in front of the facade. The night-time criterion is LAeq,9hr 55dBA. Where existing traffic noise levels already exceed these noise levels, the RNP deems an increase of up to 2dB represents a minor impact which is considered barely perceptible to the average person. (Section 5.6.1 EIS)				There have been no noise complaints either from the site or trucks leaving the site. The site complies with all requirements of B29.	Nil	Continue operation as per EPL and OEMP
Complaints Management	A complaints telephone number will be signposted at front gate. Telephone number, along with postal and email address for complaints will be advertised on the				A complaints register is maintained by the company.	2 complaints received by CRRRF during the 2024 reporting period.	Complaints management system effective.

	ResourceCo website. All complaints/concerns raised by local community/relevant authorities will be recorded on the Complaints Register by Environmental Officer. The Complaints register to be retained on site.			
Greenhouse Gas Emissions	The total estimated annual greenhouse gas emissions during the construction and operation of the facility are 4293 tCO2-e.	The total emissions for the facility in 2024 were as below: Diesel Usage – 645 tCO2-e Electricity Usage – 2295.5 tCO2-e. The total emissions for site were 2941 tCO2-e.	Nil	Continue operation as per EPL and OEMP
Visual Impacts	There is no visibility of the site from residential areas.	No change	Nil	Continue operation as per EPL and OEMP
Water Quality	The site would have no impact on water quality in Prospect Creek The site will have no impact on any groundwater underlying the site.	Cleanaway ResourceCo has completed the sampling for the Stormwater Impact Assessment and the report has been completed. CRRRF is in the final stages of updating the Water Management Plan to reflect the outcomes of the Stormwater Impact Assessment. Following this update both the Stormwater Impact Assessment report and Water Management Plan will be submitted to both the EPA and DPHI.	Nil	Completion of update to the Water Management Plan and submission to EPA and DPHI.
Traffic Management	The increase in heavy and light vehicle traffic movements in peak hours due to the operation of the proposed development is relatively minor at all intersections.	The site has not had a significant impact on traffic in the area.	Nil	Continue operation as per EPL and OEMP
Socio-Economic Impact	Potential social and economic impacts resulting from the operation of the facility are generally positive. The operation of the Waste Resource Management Facility would provide employment for approximately 40 staff at this location, with the potential for increased employment in the future.	The site employees approximately 40-45 staff and maintains a positive socio-economic impact.	Nil	Continue operation as per EPL and OEMP

Noise

Conditions B28, B29 and B30 dictate the operational noise limits and mitigation measures that are required for the site. Conditions B28, B29 and B30 states that:

Operational Noise Limits

The Applicant must ensure that noise generated by the operation of the development does not exceed the noise limits in **Table 2**.

Table 2: Noise Limits dB(A)

Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA1(1 minute)
All residential receivers	35	35	35	45

Noise Mitigation

B29. The Applicant must:

- (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;
- (b) minimise the noise impacts of the development during adverse meteorological conditions;
- (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
- (d) regularly assess noise emissions and relocated, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.

Road Traffic Noise

B30. 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. 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.

Table 5.2 of the Wilkinson-Murry Report predicts the operational noise levels for site:

Receiver No.	Operational Noise Criterion, LAeq,15min (dBA) Day/Eve/Night	Predicted Daytime Operational Noise Level LAeq,15min (dBA)	
		Neutral Conditions	Adverse Conditions
RES1 – Maugham Cr	52/48/43	30	35
RES2 – Hassall St	52/48/43	24	29
RES3 – Galton St	52/48/43	28	33
RES4 – The Horsley Dr	52/48/43	27	32
Active recreation	55-60 LAeq,period	26	31
Industrial Boundary	70-75 LAeq,period	69	-

Condition L3 of the EPL dictates the noise limits for site.

L3.1 Noise generated at the Premises must not exceed the noise limits in the Table below.

Location	Day LAeq (15 minute)	Evening LAeq (15 minute)	Night LAeq (15 minute)	Night LA1 (1 minute)
Any residential receiver not associated with the Premises	35 dB(A)	35 dB(A)	35 dB(A)	45 dB(A)

L3.2 For the purpose of condition L3.1;

- Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays.
- Evening is defined as the period 6pm to 10pm.
- Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sunday and Public Holidays.

L3.3 The noise limits set out in condition L3.1 apply under all meteorological conditions except for the following:

- Wind speeds greater than 3 metres/second at 10 metres above ground level.
- Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or
- Stability category G temperature inversion conditions.

L3.4 For the purposes of condition L3.3:

- Data recorded by a meteorological station installed on the Premises must be used to determine meteorological conditions; and
- 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.

L3.5 To determine compliance:

- a) with the Leq(15 minute) noise limits in condition L3.1, the noise measurement equipment must be located:
 - approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the Premises; or
 - 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
 - within approximately 50 metres of the boundary of a National Park or a Nature Reserve.
- 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.
- c) with the noise limits in condition L6.1, the noise measurement equipment must be located:
 - at the most affected point at a location where there is no dwelling at the location; or
 - at the most affected point within an area at a location prescribed by conditions L3.5(a) or L3.5(b).

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:

- at a location other than an area prescribed by conditions L3.5(a) and L3.5(b); and/or
- at a point other than the most affected point at a location.

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.

Operational noise is managed in accordance with the site's OEMP. The OEMP outlines the following goals and principles:

- Prevent noise pollution offsite.
- Prevent amenity impacts from noise.
- To ensure operation noise complies with the conditions of approval and EPL requirements.

Cleanaway ResourceCo uses the following strategies to manage noise on site:

- All processing machinery is located within the manufacturing buildings, except where noted.
- Keep manufacturing building roller doors closed, except when access or egress from the building is required.
- Ensure all mobile plant used is fitted with silencers.
- Mobile plant based at the site will be fitted with "quacker" style reversing alarms as opposed to beeping reverse alarms.
- Ensure all machinery, plant and equipment is maintained in proper working order in accordance with the manufacturer's requirements.
- Maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired

As per CRRRF OEMP, noise monitoring is only required in the following circumstances:

- Once the site is fully operational to gain an appreciation of noise levels and confirm source level estimations in the EIS
- As required by the EPL
- Based on receipt of a valid noise complaint
- If any significant changes are made onsite which increases noise levels

Cleanaway ResourceCo did not receive any complaints regarding noise during the 2024 reporting period.

Odour

Condition B36 of SSD 7256 dictates the odour limitations for the site. Condition B36 states:

The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).

Condition L5 of EPL 20937 states that:

Potentially offensive odour

L5.1 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.

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 potentially offensive odour and the odour was emitted in accordance with conditions of licence directed at minimising odour.

The waste accepted at Cleanaway ResourceCo's site is not expected to be odorous in nature. The facility accepts only dry construction and demolition and commercial and industrial waste which typically does not have an odour. Any loads of waste that are received at site that contain material that is odorous in nature are rejected and the waste is reloaded and removed from site. Site staff are also encouraged to report any odours to management so the source can be determined and material removed and disposed of if required.

During the 2024 reporting period Cleanaway ResourceCo received one complaint relating to odour. The complaint was received in person from the site's Eastern neighbour. The complainant stated that there was a foul odour coming from our site to the north-western corner of their site. This complaint was investigated by HSEQ staff on site with the assistance of the complainant and it was determined that Cleanaway ResourceCo was not the source of the odour.

This complaint was marked on the sites' complaint register and the reported through the sites incident management system.

Air Quality Management

Air Quality on the Cleanaway ResourceCo site is governed by the following conditions in Cleanaway ResourceCo's development approval:

Condition B32

The Applicant must implement all reasonable and feasible measures to minimise dust generated during demolition, earthworks, construction, and operation of the development.

Condition B34

Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the 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*
 - (vii) compliance monitoring.*

Condition 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.

EPL condition O3 summarises Cleanaway ResourceCo's responsibilities with respect to its EPL:

O3 Dust

O3.1 Activities occurring in or on the Premises must be carried out in a manner that prevents or minimises the generation of dust.

O3.2 The Premises must be maintained in a condition which prevents or minimises the emission of dust from the Premises.

O3.3 The licensee must ensure no visible dust leaves the Premises.

O3.4 The licensee must ensure that no material, including sediment or oil, is tracked from the Premises.

In reference to condition B32, Cleanaway ResourceCo currently has the following dust mitigation measures:

- Completely indoor facility, with the exception of the baling facilities, with all doors remaining closed closed, except when access or egress from the building is required Completely concreted facility
- Dust suppression sprinklers lining the roof of facility.
- Fogging system lining the roof of the facility.
- Dust extraction system
- Minimised drop heights when loading material either into the process or into trucks for removal from facility.
- Use of Polocitrus; a dust suppressing foam, after the primary shredder.
- Covering of all loads both into and out of site.
- Daily use of a street sweeper that removes material from hardstand areas.
- Wheel bath and rumble grid at exit to site. All trucks exit through this wheel bath and rumble grid when exiting site.
- A rigorous cleaning schedule to prevent build-up of material.

Cleanaway ResourceCo completed the Air Quality Management Plan to the satisfaction of the Secretary on 17th March 2018. The plan has since been reviewed and updated once following completion of the independent environmental audit and audit of the sites Operational Environmental Management Plan. The AQMP will be updated again following completion of the upcoming independent environmental audit in the 2025 reporting period.

With regards to Cleanaway ResourceCo's EPL condition O3, Cleanaway ResourceCo maintains the above dust mitigation strategies. No visible dust was seen leaving the premises during the 2024 reporting period and no complaints were received in relation to dust by neighbouring properties. This is in contrast to the 2023 reporting period in which 3 complaints were received. Cleanaway ResourceCo continues to use the SiteHive device as a real time measurement of its air quality on site.

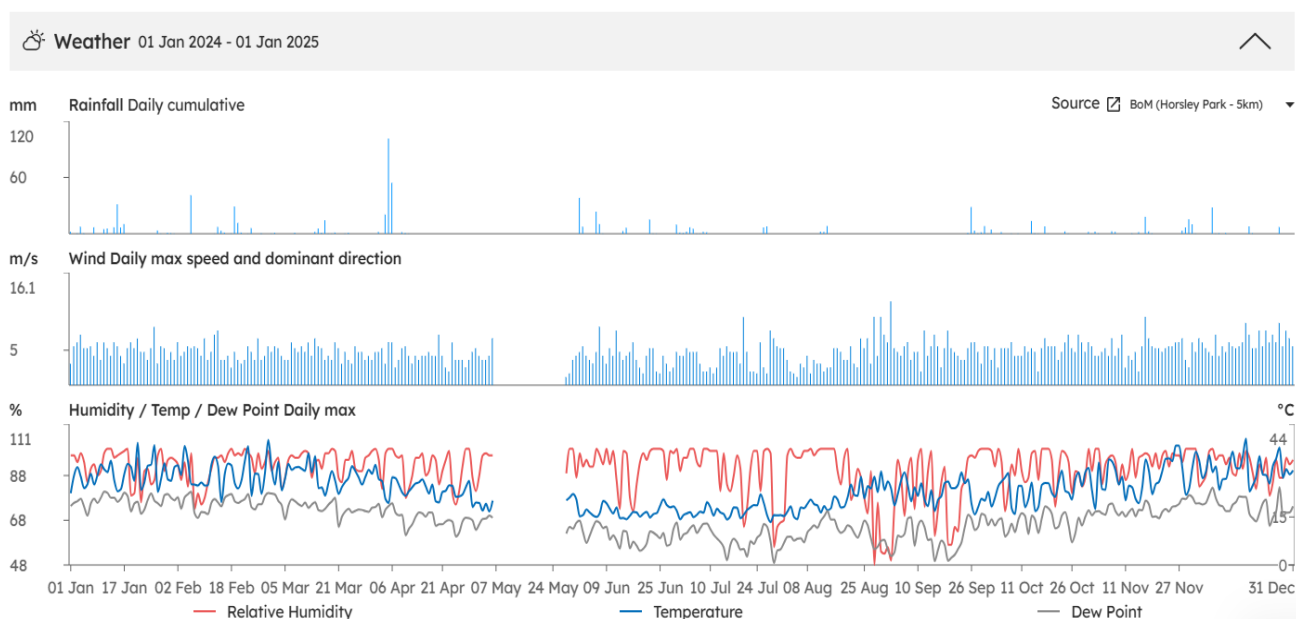


Figure 2. Weather Data

Figure 2 shows the weather and climatic conditions experienced on site during the 2024 reporting period.

The site conducted 2 reviews of its dust management process as outlined in the 2023 annual environmental review. The review consisted of looking at the effectiveness of existing dust management strategies and looking at potential additions or alternatives that are better suited to the process. The initial dust management review took place in February of 2024 and highlighted the following areas:

- All roller doors and fire doors in the facility remained closed while the facility was in operation.
- When dust is not managed well inside the facility, visibility can become poor.
- The spillage material off the baler had not been cleaned effectively.
- Major facility dust down had not happened yet that quarter as per the cleaning program.
- There was a lack of evidence of maintenance on dust management equipment.

- A street sweeper attends site daily to conduct a clean of the hard stand surfaces.
- Two air separators required adjustment to the air flow.
- There was evidence of spillage from conveyors that had not been addressed.
- The cool fog/Deodouriser system was not being used appropriately

The above issues were raised with the relevant areas and were addressed if required. The audit highlighted areas where the site could improve in regard to its dust management processes. Cleanaway ResourceCo undertook the following strategies to combat the issues raised in the previous dust management review:

- Revamp and reintegration of the cleaning program, including increasing the frequency of cleaning around the baler area.
- A service and clean of the dust extraction system was required. This vastly improved visibility both in the manufacturing facility and the storage shed.
- Maintenance for the dust management systems within the plant is now scheduled using the MEX maintenance system and conduct on a regular basis.
- The Deodouriser and fogging system has now become the primary means of dust suppression within the factory, replacing the dust suppression sprinklers. This was mainly due the sprinkler system use resulting in material clogging the tracks on excavators.
- Airflow in the air separators to be adjusted to prevent blowing of dust away from its source.
- An automatic switch for the Polocitrus dust suppression foam is to be installed to ensure the system begins working at the same time as the plant starts up and is shutdown when the plant shuts down.

Following completion of these actions another dust management review was undertaken, and a significantly higher compliance score was achieved. Cleanaway ResourceCo will continue to investigate further measure of dust suppression and continue to monitor and audit its dust management systems and processes. Cleanaway ResourceCo expects another two audits during the 2025 reporting period, which will further inform the dust management on site.

Water management

Cleanaway ResourceCo's water management is governed by the following conditions in development approval SSD 7256:

Stormwater Management System

Condition B16.

The Applicant must design, install and operate a stormwater management system for the development. The system must:

- (a) ensure the system is designed by a suitably qualified and experienced person(s), generally in accordance with the conceptual design in the EIS and applicable Australian Standards and in consultation with Council;*
- (b) ensure that the system capacity has been designed in accordance with Managing Urban Stormwater- Soils and Construction Vol. 1 (Landcom, 2004);*
- (c) divert existing clean surface water around operational areas of the site;*
- (d) direct all sediment laden water in overland flow away from the leachate management system;*
and
- (e) prevent cross-contamination of clean and sediment or leachate laden water.*

Condition B17.

Prior to the issue of a Construction Certificate, a certificate must be submitted to the Certifying Authority certifying that:

- (a) satisfactory arrangements have been made for the disposal of stormwater;*
- (b) the proposed development and alterations to the natural surface contours will not impede or divert natural surface water runoff so as to cause a nuisance to adjoining properties; and*
- (c) the piped drainage system has been designed to Council's Stormwater Drainage Policy.*

Condition B19.

The stormwater drainage generated from the development must be directed to:

- (a) the drainage easement; and*
- (b) Council's street kerb and gutter.*

Condition 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.

Water Management Plan

Condition B22.

Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to the satisfaction of the Secretary. The Water Management Plan must:

(a) form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6;

(b) be prepared in consultation with DPI;

(c) detail water use, metering, disposal and management on-site;

(d) detail the water licence requirements for the development;

(e) detail the management of wastewater streams on-site, including leachate and firewater;

(f) contain a Surface Water Management Plan, including:

- The water management plan is under review to ensure it meets B15 requirements and EPL guidelines.
- Cleanaway ResourceCo is currently undertaking stormwater sampling to assess the performance of the water management systems. This report and plan are expected to be completed by the end of 2024.
 - (i) a program to monitor:
 - surface water flows and quality; and
 - surface water storage and use;
 - (ii) sediment and erosion control plans;
 - (iii) surface water impact assessment criteria, including trigger levels for investigating potential adverse surface water impacts; and
 - (iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.

Condition B23.

The Applicant shall ensure the Water Management Plan (as required and approved by the Secretary from time to time) is implemented for the operational life of the development.

EPL 20937 dictates that Cleanaway ResourceCo has the following responsibilities in regard to water:

L1 Pollution of waters

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.

U1 Stormwater Review

U1.1 The Licensee must engage an independent, suitably qualified and experienced person to complete a review of the Premises' Water Management Plan dated 9 March 2018 (the Review). The Review must also include the assessments specified in conditions U1.2, U1.3, and U1.4, and provide a report as required by condition U1.5.

U1.2 The Licensee must engage an independent, suitably qualified and experienced person to conduct a Stormwater Impact Assessment that is to include an assessment of pollutant concentrations and loads following stormwater discharges from the Premises for all sampling events between 6 June 2023 and 6 October 2023. The assessment should include a discussion of the effects of the sampled pollutant loads on the receiving environment with respect to the relevant Australian and New Zealand Environment and Conservation Council (ANZECC)(2000) water quality guidelines.

U1.3 The Licensee must engage an independent, suitably qualified and experienced person to conduct a System Performance Evaluation that is to include:

1. An outline of all currently installed stormwater quality treatment devices and pollution controls, and the corresponding pollutant/s they are designed to control. The outline must include a table showing each pollutant identified by the sampling conducted by the Licensee and the corresponding stormwater treatment device and/or pollution control measure, and identify any pollutants being discharged that are not treated and/or controlled prior to discharging from the Premises.

2. An evaluation of the effectiveness of the currently installed stormwater quality treatment devices and pollution controls on the Premises based on the assessment required by Condition U1.2. The evaluation must also identify additional reasonable and feasible controls and/or treatment devices that may be required to address any pollutants that continue to exceed the ANZECC (2000) assessment criteria as determined in U1.2.

3. Based on the assessment in U1.2 and the evaluation in U1.3, review and update Section 3.5 of the Premises' Water Management Plan to include treatment performance benchmarks based on ANZECC (2000) assessment criteria.

U1.4 The Licensee must prepare an Action Plan to implement improvements and install/maintain additional controls identified by condition U1.3. The Action Plan is to include:

1. An outline of any additional controls and/or treatment devices that are required to meet treatment performance benchmarks based on ANZECC (2000) assessment criteria, and

2. A proposed timeframe for each new control to be installed at the Premises.

U1.5 Provide a Stormwater Management Review Report detailing the findings of U1.2, U1.3 and U1.4, and an updated copy of the Premises' Water Management Plan to the EPA by 5pm 22 December 2023 to info@epa.nsw.gov.au.

Conditions B16, B17 and B19 were met during the construction phase of the project with the installation of the following stormwater pollution control devices:

- HumeGard HG18 GPT
- Humes JellyFish JF3000-19-4 Filter
- Ecosol RSF100 litter baskets

These were replaced by comparable Ocean Protect OceanGuard equipment.

The site has an underground drainage system for surface water which comprises of below ground pits and pipe culverts. The site is segregated into 2 catchment areas.

- Catchment 2 comprises the majority of the site's catchment, with stormwater directed to the north-west corner of the site prior to discharge off-site to a stormwater pipe (900 mm diameter culvert in the stormwater drainage easement). This pipe would also receive stormwater from other surrounding sites.
- The remaining part of the site is Catchment 1 which is minor in area and stormwater from it is discharged to the Frank Street Council drainage infrastructure.

Catchment 2 includes the manufacturing facility roof and runoff from the hardstand, baling and bale storage areas around the processing facility building. Roof runoff is conveyed to underground tank storage. Ground surface runoff is conveyed to pit SEP6 and junction box 6 (JB6) before flowing in regular flow conditions into the Ocean Protect (formerly Stormwater 360) 19 cartridge Stormfilter (Figure 3). Subsequent to this, it joins overflow from roof underground tanks and discharges to the Council drainage easement pipe.

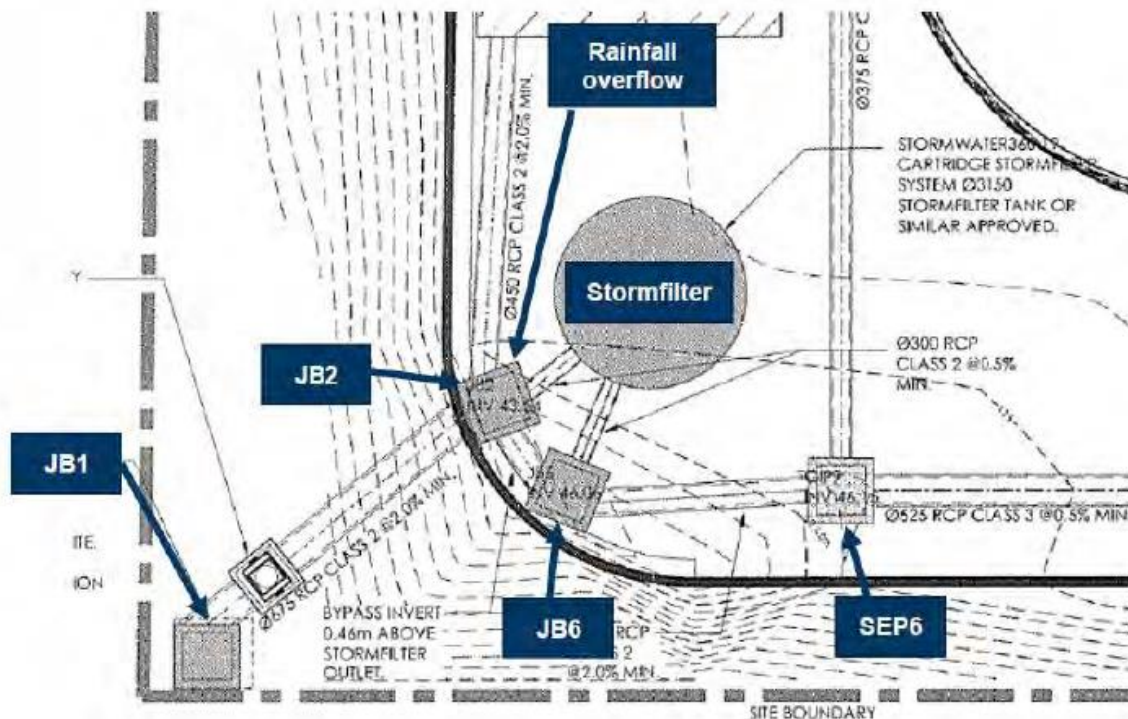


Figure 3. As-built flow diagram

All drainage pits have the required markings as per condition B20.

Cleanaway ResourceCo's Water Management Plan was first developed in March 2018 to the satisfaction of the Secretary. This plan is due to be updated following completion of the Stormwater Impact Assessment as outlined in condition U1.2 of EPL 20937.

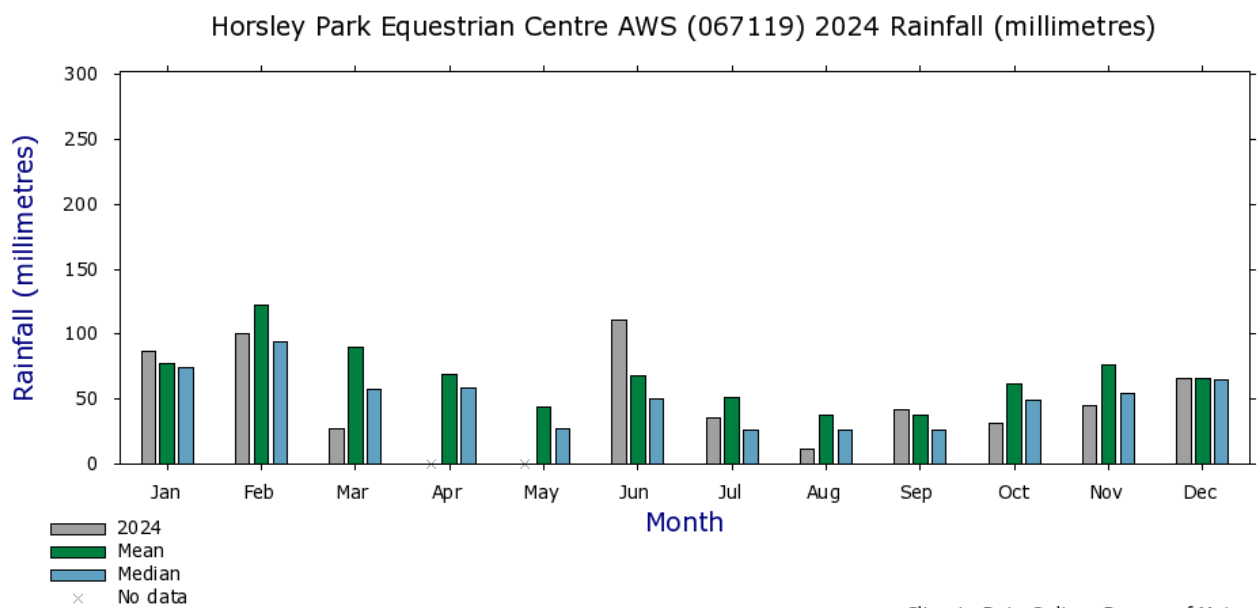
During the 2024 reporting period Cleanaway ResourceCo expended considerable effort to conduct continued monitoring of the surface water on site. In total there was 6 rounds of monitoring conducted, with the following analytes tested:

- Metals (dissolved) - aluminium, arsenic, boron, cadmium, chromium, cobalt, copper, iron, lead, manganese, mercury, nickel, selenium, zinc
- Metals (total) - aluminium, arsenic, boron, cadmium, chromium, cobalt, copper, iron, lead, manganese, mercury, nickel, selenium, zinc
- Alkalinity (total as CaCO₃)
- Anions - sulfate, chloride
- BOD
- Cations - calcium, magnesium, sodium, potassium
- Dissolved organic carbon
- Hardness

- Total dissolved solids
- Total suspended solids
- Total recoverable hydrocarbons (C6-C40) (includes volatile organic compounds)
- Benzene, toluene, ethylbenzene, xylene and naphthalene (BTEXN)
- Polycyclic aromatic hydrocarbons (PAHs)
- Oil and grease (ug/L)
- Organochlorine pesticides (suite of 15 analytes)
- Organophosphate pesticides (suite of 11 analytes)
- Nutrients - ammonia, nitrite, nitrate, TN, TP
- Temperature, pH, electrical conductivity (EC), turbidity (NTU) and oxidation-reduction potential (redox) - done via a probe

An extension was granted by the EPA on 10th of January 2024, to satisfy condition U1 of EPL 20937, in which no new due date was set. The results of the testing conducted during the 2024 reporting period will be finalised in the stormwater management review which will be submitted to the EPA along with the updated water management plan within the first quarter of 2025.

Below is a graph summarising the total rainfall experienced on site during the 2024 reporting period. Rainfall on the site was highest during June. This is uncommon for the site as generally rain is greater in the Summer months. January and February were the next highest months for rainfall on site.



Note: Data may not have completed quality control

Climate Data Online, Bureau of Meteorology
 Copyright Commonwealth of Australia, 2025

Biodiversity

The site does not contain any conditions in either its development consent or EPL regarding biodiversity. The site is situated in an industrial zone with little vegetative cover. The site has little to no impact on the area's biodiversity.

Visual Amenity

The site does not contain any conditions in either its development consent or EPL regarding its visual amenity. All waste is stored internally to the building with the exception of baled and wrapped waste. There is no visibility of the site from nearby residential areas.

Heritage

The site has no conditions in either its development consent or EPL regarding heritage. The site does not sit on heritage listed area or contain any heritage listed vegetation.

Community Complaints Management

2 complaints were received from the community during the 2024 reporting period.

Date and Time	Complaint Received From	Nature of Complaint	Outcome
10/07/2024 10:30am	Mark Shaw - Vellex	Odour.	Site was determined not to be the source of the odour following investigation. This was communicated to the complainant.
02/09/2024 3:00pm	Tony Florio - Hindmarsh	Plastic wrapping on road.	The site was experiencing significant wind event at the time. The wrapping was promptly cleaned and street sweeper urgently called out to conduct clean of road.

Table 8. EPA regulatory activity

5-year Review	Licence Review	5-year review was underway in 2023. This has been held up due to noise limits not being aligned to <i>NSW Noise Policy for Industry</i> .
Site Visit 06/02/2024	Site Visit	EPA officers visited site unannounced. The visit resulted in an invitation to show cause letter being issued to the site. CRRRF responded to this letter and it is currently with the EPA to respond.
Fire on site. 01/05/2024	Report to EPA on fire	EPA attended site on 08/05/2024 following the report.
Site Visit 08/05/2024	Site Visit following report of fire.	CRRRF staff had reported a fire incident on site to the EPA on 01/05/2024. EPA visited site on 08/05/2024 following this report. Following site visit, the EPA had several follow-up questions which were responded to by CRRRF staff. No further follow-up action was required following this request for information.
Site Visit 22/08/2024	Site Visit	EPA officers visited site unannounced. EPA had several follow-up questions which CRRRF responded to. No further follow-up action was required following this request for information.

Operational Forecast

During the upcoming reporting period, Cleanaway ResourceCo will be continuing to review its dust mitigation and management techniques.

Cleanaway ResourceCo will be finalising the update to its Water Management Plan following the completion of the Stormwater Impact Assessment. CRRRF expects the updated Water Management Plan to be submitted to DPHI by the end of June 2025.

Cleanaway ResourceCo will be conducting an investigation into the possible capture, retention and reuse of stormwater on site as a means of dust suppression. CRRRF expects this investigation to be completed by the end of the 2025 reporting period.

During the 2025 reporting period Cleanaway ResourceCo will be changing its trading name to ResourceCo Wetherill Park.

Activities to be completed in the next reporting period.

- Submission of updated Water Management Plan following completion of Stormwater Impact Assessment.
- Continued stormwater monitoring as per the updated water management plan.
- Submission of modification application to DA based on updating the site noise guidelines to adhere to NSW

Noise Policy for Industry and the installation of an additional baler.

- Upgrade of site's sprinkler system classification from ordinary hazard to high hazard
- Investigation into further dust management practices.
- Investigation into the possible of re-use of stormwater on site as dust suppression.