



*Alternative fuel for a sustainable future*

# **Response to Recommendations and Opportunities for Improvement**

## **Cleanaway ResourceCo RRF**

**Independent Environmental Audit Report, March  
2019**

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### **Terms of Reference**

<b>IEA</b>	Independent Environmental Audit
<b>EPA</b>	Environmental Protection Agency
<b>DPE</b>	Department of Planning and Environment
<b>OEMP</b>	Operational Environmental Management Plan
<b>LMP</b>	Landscaping Management Plan
<b>EfWMP</b>	Energy from Waste Management Plan
<b>EHS Officer</b>	Environment Health and Safety Officer
<b>MEX</b>	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 commissioned an Independent Environmental Audit (IEA). This IEA covered the operational period from 12 June 2018 to January 2019 and was carried out in accordance to 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 in regards to the recommendations raised. Management is generally in agreement 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

Action Plan	Source Document Reference	IEA Report Recommendation reference	Audit Report Finding	Recommendation	CLEANAWAY RESOURCECO MANAGERMENTS RESPONSE			
					Management Decision and Comments	Work Plan	Responsible Personnel	Estimated completion date
1	CoA B29  OEMP Section 9.5	R-01	Noise	Engage external consultant to conduct a noise impact assessment to confirm noise source level estimations and predicted noise impacts to surrounding receivers.	<p><b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION.</b></p> <p>This will be in addition to the approved noise impact assessment done as part of the EIS approval.</p> <p>This initial noise assessment undertaken as part of the approved EIS did not cover these requirements.</p>	<p>1. Tendering of Job by <b>31/03/19</b></p> <p>2. Site assessments and Report compilation done by <b>30/04/19</b></p>	EHS Officer	30/04/19
2	CoA A23; CoA B32 CoA B35 EPL O3.1  OEMP Section 9.6  AQMP Section 4	R-02	Dust	<p>Undertake a dust impact assessment of the facility. The assessment should consider:</p> <ol style="list-style-type: none"> <li>1. Actual versus EIS estimated annual levels of dust from operational activities and predicted impacts on surrounding receptors.</li> <li>2. Activities that generate dust and dust sources within those activities</li> <li>3. Effectiveness of current mitigation measures to control dust at source including process plant and equipment and operating instructions</li> <li>4. Effectiveness of the maintenance and inspection regime for the dust control systems associated with the plant.</li> </ol>	<p><b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION.</b></p> <p>It is also worth noting that in order to get an in-depth understanding of how operations would impact air quality, environmental dust assessments had been delayed on purpose because full operational capacity had not yet been achieved in terms of incoming waste tonnage and operational hours. For instance, full two shift day operations were only implemented in January 2019, coming from single shift operations.</p>	<p>1. Tendering of Job by <b>31/03/19</b></p> <p>2. Site assessments and Report compilation done by <b>30/04/19</b></p>	EHS Officer	30/04/19
3	CoA A23  EPL O2.1	R-03	Stormwater	Develop a maintenance and inspection schedule on MEX 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.	<p><b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION.</b></p> <p>Manufacturer manuals recommends an annual inspection</p>	<p>1. Schedule inspection and maintenance schedule now setup in MEX maintenance system</p>	Maintenance Supervisor	Completed on 15/03/2019

					and at the time of the audit this had not yet been triggered.			
4	CoA B23 EPL M1.3	R-04	<b>Water quality Monitoring</b>	<ol style="list-style-type: none"> <li>Undertake the water quality monitoring program in accordance with the commissioning phase of the operation</li> <li>Maintain water quality sampling records in accordance with the EPL Condition M1.3.</li> </ol>	<p><b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION.</b> All aspects of condition EPL M1.3 where being recorded except for "time"</p> <p>Water quality monitoring commissioning phase scheduled to begin <b>12/06/2019</b> in accordance to Water Management Plan</p>	<ol style="list-style-type: none"> <li>"Time" section has been added onto existing chain of custody template form.</li> <li>Will start water quality monitoring in accordance with commissioning phase by <b>12/06/2019</b>. As already scheduled in Water Management Plan.</li> </ol>	<b>EHS Officer</b>	<p>Completed template adjustment on <b>15/03/2019</b>.</p> <p>To commence water monitoring in accordance to commissioning stage on <b>12/06/19</b></p>
5	CoA A23 CoA B3 EPL O2.1 OEMP Section 9.12	R-05	<b>Maintenance along the western boundary</b>	<ol style="list-style-type: none"> <li>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.</li> </ol>	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	<ol style="list-style-type: none"> <li>Adjust current yard cleaning schedule and develop new duty roster with more minutes and personnel dedicated to cleaning the yard by <b>22/03/19</b></li> <li>Implement new cleaning schedule by <b>22/03/19</b></li> </ol>	<b>General Manager</b>	22/03/19
6	CoA B39 EIS 10.6	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>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	Adjust current monthly site audit template to include checking parking area against AS2890.1 standard by <b>15/03/19</b>	<b>EHS Officer</b>	Completed on 15/03/19
7	CoA B42 CoA B43 OEMP Section 9.10	R-07	<b>Hazardous Substances</b>	Undertake an annual review of all hazardous substances stored on site against the requirements of Condition B43.	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b> It is also worth noting that at the time of the audit, the workshop area was undergoing internal renovations and temporary storage was in use because of space limitations.	Conduct an annual review of all hazardous goods storage no later than <b>30/04/19</b> .	<b>EHS Officer</b>	30/04/19
8	CoA B46 OEMP Section 9.11	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	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	<ol style="list-style-type: none"> <li>Engage land scaping consultants for alternative land scaping options where</li> </ol>	<b>EHS Officer</b>	30/04/19 (subject to approval timing)

				and seek approval from the Department of Planning.		<p>building structures have made the LMP plan unachievable, Cleanaway ResourceCo will seek approval for variations by <b>12/04/19</b></p> <p>2. To implement approved land scaping variations by <b>30/04/19</b> (subject to approval timing)</p>		
9	CoA C14	R-09	<b>Web-page information</b>	Report all site monitoring results on the Cleanaway ResourceCo 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>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	<p>1. General manager to assess which additional monitoring data is relevant and suitable for public display on the company website by <b>1/04/2019</b></p> <p>2. Consult DPE on exclusion of monitoring data that might be commercial confidence and implement the display of agreed data by <b>30/04/19</b></p>	<b>General Manager</b>	30/04/19
10	EPL O6.2	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>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	<p>1 To Liaise with EPA and submit the IEA audit report to satisfy this EPL condition by 19/3/19</p>	<b>General Manager</b>	19/3/19
11	OEMP Section 5.1 SoC – I&T	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. The program shall also include guidance on when retraining will be necessary.	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	<p>1 Amend current inductions program and forms for labour hire and contractors to include a more in-depth environment awareness section by <b>22/04/19</b></p>	<b>EHS Officer</b>	22/04/19

12	SoC – N&V	R-12	<b>Quackers</b>	<p>Consider the incorporation of the following noise control into the OEMP, as specified in the statement of commitments:</p> <ul style="list-style-type: none"> <li>plant based at the site will be fitted with "quacker" style reversing alarms.</li> </ul>	<p><b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b></p> <p>Currently the Front End loaders have these devices fitted, however the remaining mobile plant will be assessed accordingly.</p>	<ol style="list-style-type: none"> <li>Investigate possibility of installing quacker or equivalent alarm on remaining mobile plant by <b>30/04/19</b></li> <li>Implement quacker reversing alarms or equivalent alternatives by <b>10/05/19</b></li> </ol>	<b>General Manager</b>	10/05/19
13	CoA B48	R-13	<b>Lighting</b>	<ol style="list-style-type: none"> <li>Confirm that the external lighting complies with AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting.</li> </ol>	<p><b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b> Attempts to acquire this information before audit completion from building owner and building contractor where unsuccessful.</p>	<ol style="list-style-type: none"> <li>To engage building contractors and owner to provide relevant compliance documentation by <b>31/03/19</b></li> </ol>	<b>General Manager</b>	31/03/2019
14	EfWMP Section 4	R-14	<b>EfWMP Calculation</b>	<ol style="list-style-type: none"> <li>Update the EfW calculation method in the EfWMP, so it is consistent with the calculation method approved by the EPA.</li> </ol>	<p><b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b></p> <p>Note that the NSW EPA approved the updated calculation on 5/3/19</p>	<ol style="list-style-type: none"> <li>To update EfWMP with current PEF calculation formula approved by EPA by <b>30/04/19</b></li> </ol>	<b>EHS Officer</b>	30/04/19

# RESPONSE TO IMPROVEMENT OPPORTUNITIES

Action Plan Number	Source Document Reference	IEA Opportunity for Improvement reference	Audit Report Finding	Recommendation	CLEANAWAY RESOURCECO MANAGEMENT RESPONSE			
					Management Decision and Comments	Work Plan	Responsible Personnel	Estimated completion date
1	CoA B21	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>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	1. Schedule in MEX system inspection of stormwater shut-off valve at 6 monthly intervals by <b>15/03/19</b>	<b>EHS Officer</b>	Completed 15/03/2019
2	CoA A7	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 for easy reference.	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>  All customers have a pre-qualification audit completed, however Cleanaway ResourceCo accepts this opportunity for improvement recommendation to allow easy reference.	1. Creation of register by <b>31/03/19</b>	<b>Sales Manager</b>	31/03/2019
3	CoA B4	IO-03	<b>Customer records - outgoing waste</b>	Maintain a controlled register of all customers receiving waste from the facility including pertinent information such legal entity (ABN/ACN number) and authority to receive waste.	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	1. Creation of register by 31/03/19	<b>Sales Manager</b>	31/03/2019
4	CoA B10	IO-04	<b>Waste Monitoring Program</b>	Establish a document that collates all the requirements of the Condition B10 into one concise " <b>Waste Monitoring Program</b> " document as a reference for personnel responsible for the monitoring of incoming and outgoing wastes.	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>  This is in addition to the comprehensive job description that already exists for the Waste Reveal Inspection Officer role.	1. Through usage of Navision system data create a concise template for <b>Waste Monitoring Program</b> to be completed and implemented by 30/04/19	<b>Sales Manager</b>	30/04/2019
5	CoA B30 SoC I&T	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	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	1. Amend existing driver code of conduct to add recommendation by 31/03/19	<b>EHS Officer</b>	31/03/19



				on site, minimise vehicle maneuvering on site.				
6	CoA B42 CoA B43 CoA C4 EPL M1.3 SoC – Objectives	IO-06	Update the OEMP	<p>Revise the OEMP to include:</p> <ol style="list-style-type: none"> <li>1. More explicit environmental responsibilities and authorities for key Cleanaway ResourceCo personnel</li> <li>2. Procedures to inform the local community of Cleanaway ResourceCo operations, if and as required.</li> <li>3. More consistency in documentation regarding commitment to notify of DPE, in the event of an environmental incident or emergency.</li> <li>4. The record keeping requirements of the EPL (Condition M1.2 and M1.3) should be referenced in the OEMP.</li> <li>5. OEMP objectives should include: <ol style="list-style-type: none"> <li>a) A commitment to new technologies through-out the life of the plant.</li> <li>b) Extent to which it encourages and facilitates community participation in the recycling of building and construction waste.</li> </ol> </li> <li>6. 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>7. Improved guidance on how primary legislation referenced in the OEMP applies to operations</li> </ol>	<p><b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b></p> <p>It is agreed by Management to adopt these recommendations. However, document will need to be reviewed in a holistic manner as many components of the OEMP are interlinked and any significant isolated changes may result in incoherence of the document.</p>	<ol style="list-style-type: none"> <li>1. Entire OEMP will be reviewed by Cleanaway ResourceCo Management team as part of the scheduled annual environmental performance assessment. In this management review any other improvements raised will be finalised together with the Audit report recommendations by <b>31/05/19</b></li> <li>2. All agreed improvements (including recommendations of the IEA report) will then be adopted and implemented by <b>30/06/19</b> after approval from any relevant authorities</li> </ol>	EHS Officer	30/06/19
7	EPL L1.1 EPL L5.1	IO-07	Legislation	<p>The following Sections of the Protection of the Environment Operations Act 1997 and their obligations should be referenced in the OEMP:</p> <ol style="list-style-type: none"> <li>1. Section 120 - Pollution of waters</li> </ol>	<p><b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b></p>	Changes to the OEMP to be implemented by 30/06/19. Also refer to above action 6, work plan.	EHS Officer	30/06/19

				2. Section 129 – Potentially offensive odour				
8		IO-08	<b>Monitoring and inspection program</b>	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.	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	Create and maintain monitoring and inspection program tailor made for ensuring efficient implementation of the OEMP by 5/04/19	<b>EHS Officer</b>	5/04/19
9		IO-09	<b>Maintenance of plant and equipment</b>	The OEMP should identify (or reference documents which identify) critical plant and equipment and for each item, specify: <ol style="list-style-type: none"> <li>1. An inspection regime to monitor its performance / effectiveness</li> <li>2. Maintenance requirements to ensure Cleanaway ResourceCo meets its environmental obligations.</li> </ol> Critical plant and equipment may include apparatus to control dust, noise and stormwater treatment.	<b>CLEANAWAY RESOURCECO ACCEPTS THIS RECOMMENDATION</b>	EHS officer to create a maintenance inspections checklist for critical plant and equipment that has direct impact on environmental performance by 05/04/19.  Maintenance department to adopt and implement list and ensure maintenance and efficiency of all identified plant and of created checklist by 11/04/19	EHS Officer and Maintenance Supervisor	11/04/19

