



Cleanaway ResourceCo RRF SSD 7256

Independent Environmental Audit
March 2019 Rev 0



Executive Summary

This audit

Cleanaway ResourceCo RRF Pty Ltd (Cleanaway ResourceCo) commissioned OptimE Pty Ltd (OptimE) to undertake an Independent Environmental Audit (IEA) of its Wetherill Park Resource Recovery Facility (the facility) in accordance with Condition C12 and C13 of the Project Approval SSD 7256 MOD 1 (Approval). The facility, located at 35-37 Frank St, Wetherill Park NSW comprised a Waste and Resource Management Facility to convert waste material into Process Engineered Fuel (PEF) and reusable commodities such as metal, timber, concrete, bricks, rubble and soil. This audit covers the operational period of 1 June 2018 to 31 January 2019. As-built conditions addressed prior to the operational period, which influence the performance of the plant, have also been included in the scope of this audit. Construction related conditions were excluded.

Consultation with agencies and regulatory action

The auditor consulted with relevant agencies by letter as part of the scope of this audit. The letters invited agencies to comment on Cleanaway ResourceCo's compliance with the conditions of approval and environmental performance generally. The NSW Environment Protection Authority (EPA) and NSW Fire and Rescue (FRNSW) did not report any outstanding matters associated with the facility. Fairfield City did not respond to the invitation. Subsequent to the EPA's written correspondence to the auditor, the EPA issued to Cleanaway ResourceCo an "invitation to show cause" letter. The letter related to EPA observations of PEF bales stored on site, outside of the designated storage area. Cleanaway ResourceCo responded to the EPA, the detail of which is summarised in Section 3.3. of this report.

Environmental performance

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

Waste management	Consistent with the commitments made in the EIS except for storage of PEF bales, outside of the designated area.
Odour	Likely negligible impacts to the surrounding industrial receivers and distant residential receivers.
Noise	Likely low noise impacts to the surrounding industrial receivers and distant residential receiver, although noise monitoring is recommended to verify the predictions in the EIS.
Dust	Dust impacts to the surrounding industrial receivers and distant residential receivers were low at the time of the inspection. However, given the capacity of the process to generate levels of dust higher than predicted in the EIS, robust dust mitigation measures are necessary to provide assurance that nuisance dust is not generated from site activities in adverse weather conditions, or in the longer term.
Leachate and fire water systems	Constructed in accordance with the requirements of the Approval and FRNSW.
Stormwater system	Constructed in accordance with the requirements of the Approval, including in-line water treatment devices. Water quality discharge from the site could not be assessed as the facility was monitoring surface waters in accordance with its pre-commissioning phase.

Assessment of Compliance

The facility demonstrated a high level of compliance with its Approval, Environmental Protection licence (EPL), Operational Environmental Management Plan (OEMP), Statement of Commitments (SoC) and EIS predictions. In particular, a high level of compliance was demonstrated in relation to:

- no complaints or off-site environmental impacts
- operating within its limit of consent
- consulted with all relevant public authorities
- maintained an EPL with the EPA
- waste management
- pest, vermin and noxious weed management
- preparation and implementation of the OEMP and associated sub-plans.

In total, thirty non-compliances were identified by this audit however numerous requirements are repeated between assessable documents. A summary of non-compliances recorded against the assessable documents is provided below. Where non-compliances overlapped numerous documents, the non-compliance has been listed for the primary document only. Refer to Section 3.5 of this report for further detail on non-compliances against each assessable document.

Approval	<ul style="list-style-type: none">• PEF debris was observed outside of the process building• PEF bales were located in non-designated storage areas• There was no routine program to maintain some treatment elements of the stormwater system• The facility was operating with open roller doors, due to a malfunction at the time of the audit (closed out)• Parking for workers was occupied by PEF bales (closed out)• Storage of hazardous substances were not in accordance with relevant Australian standards (partly closed out)• Landscaping was not consistent with the Approval• The OEMP and sub-plans were not fully implemented in some instances• Stormwater monitoring results were not available on the company website
<i>The following additional non-compliances were identified against the assessable documents:</i>	
EPL	<ul style="list-style-type: none">• OEMP Audit had not been undertaken as required by the EPL• Water quality records were not maintained to full EPL requirements
OEMP and sub-plans	<ul style="list-style-type: none">• Environmental awareness training did not extend to all personnel on site• There was an inconsistency between the Energy from Waste Management Plan (EfWMP) PEF formula and the applied PEF formula, approved by the EPA
Statement of commitments	<ul style="list-style-type: none">• Quackers were not referenced in the OEMP
EIS predictions	<ul style="list-style-type: none">• NIL

Adequacy of management plans

A review of the OEMP and sub-plans confirmed they had been prepared in compliance with the Approval and implemented to a high level. Opportunities to improve the effectiveness of the plans are detailed in Section 3.13 of this report and relate to:

- editorial improvements
- monitoring implementation of the OEMP
- maintenance of plant and equipment.

Recommendations and improvement opportunities

Fourteen recommendations were made to address non-compliances identified by this audit. Nine opportunities for improvement were also identified. These are presented in Section 4 of this report.

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1 Introduction

1.1 Background

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

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

1.2 Site description

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

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

1.3 Audit objectives and scope

The audit covers the operational period of 1 June 2018 to 31 January 2019. As-built conditions addressed prior to the operational period, which influence the performance of the plant, have also been included in the scope of this audit. Construction related conditions have been excluded.

This IEA has been prepared in accordance with Condition C12 and C13 of the Approval. Table 1 lists the requirements of these conditions and where each requirement addressed within this report.

Table 1 Independent Environmental Audit (IEA) Conditions

Condition No.	Requirement	IEA details and reference
C12	Within six months of the commencement of operation, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:	-
(a)	be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;	Section 1.5 Appendix B
(b)	include consultation with the relevant agencies;	Section 3.2
(c)	assess the environmental performance of the development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals)	Section 3.4 Section 3.5
(d)	review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and	Section 3.13
(e)	recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these consents.	Section 4
C13	Within two months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Appendix A Table A1, Condition C13, Appendix B

1.4 Key documents within the scope of the audit

Cleanaway ResourceCo performance has been assessed against the key requirements of the following documents.

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

1.5 Audit team and participants

Maurice Pignatelli was the nominated lead auditor for this audit. He met DPE criteria set out by conditions C12 (a) and was approved by DPE prior to commencement of the audit. A copy of the approval letter is attached as Appendix B to this report.

Cleanaway ResourceCo personnel that participated in the audit were:

- CEO ResourceCo Sustainable Energy (teleconference during interviews and close meeting)
- EHS Officer (interviews and site inspections)
- Weigh bridge operator (interview)
- Maintenance supervisor (teleconference interview).

1.6 Limitations of this report

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

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

2 Audit methodology

2.1 Audit approach

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

2.2 Audit stages

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

Table 2 Audit stages and program

Stage	Program
Audit commissioned	16 January 2019
Consultation with agencies	18 January 2019
Audit protocol submitted	21 January 2019
Desk-top review	21 January 2019 to 4 January 2019
Interviews and site inspections	4 February and 19 February 2019
Analysis	4 February to 8 March 2019
Reporting	11 February to 15 March 2019

2.2.1 Audit protocol

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

2.2.2 Desk-top review

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

2.2.3 Consultation with the agencies

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

2.2.4 Site inspection

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

- As built details in accordance with the Approval
- Operations in accordance with the OEMP and supporting plans
- Implementation and effectiveness of environmental controls
- Impact of the facility on the environment

The auditor was accompanied by the site's Environment Health and Safety (EHS) officer.

2.2.5 Interviews

Following the site inspection, audit interviews were conducted with the CEO ResourceCo Sustainable Energy (via teleconference), EHS officer, and operational personnel. The interviews were guided by the updated audit protocol. Documentary evidence and site observations were sought to collaborate responses provided by Cleanaway ResourceCo personnel.

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

The auditor agreed to conduct a second close meeting via teleconference with the CEO ResourceCo Sustainable Energy, as he was not able to attend the close meeting.

2.2.6 Reporting

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

2.3 Compliance status descriptors

The compliance status of each compliance requirement in the Audit Compliance tables in Appendix A has been determined using the relevant descriptors below, in accordance with DPE's Independent Audit, Post Approval Requirements (IAPAR), June 2018.

- **Compliant** - The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
- **Non-compliant** - The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
- **Not triggered** - A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

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

3 Audit findings

3.1 Documentary evidence

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

3.2 Consultation with relevant agencies

3.2.1 Consultation log

Letters were issued to relevant agencies referenced in the Approval. The letters invited agencies to comment on Cleanaway ResourceCo’s compliance with the conditions of approval and environmental performance generally. A log of correspondence with the agencies is provided in Table 3.

Table 3 Agency correspondence log

Agency	OptimE invitation to comment letter	Interim correspondence	Response from the agency
NSW Environment Protection Authority (EPA)	18 January 2019	Nil	EPA letter 29 January 2019
NSW Fire and Rescue (FRNSW)	18 January 2019	Clarifying email and conversation on 18/01/2019 Clarifying conversation on 05/02/2019	FRNSW email 06 February 2019
Fairfield City	18 January 2019	Reminder letter on 06/02/2019	No response

3.2.2 Response from EPA

EPA advised that it has undertaken three inspections of the Cleanaway ResourceCo premises since it was issued an Environmental protection Licence on 9 May 2017. EPA confirmed that to date, the EPA has not taken any regulatory action in relation to the Licence or scheduled activities at the Premises.

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

3.2.3 Response from FRNSW

FRNSW confirmed that ResourceCo engaged FRNSW during the design phase of works and submitted reports to FRNSW in accordance with Environmental Planning and Assessment Regulation 2000. An occupation inspection of the facility was undertaken by FRNSW and a series of recommendations were made. FRNSW advised that it is up to the Certifying Authority to notify FRNSW where such recommendations have not been adopted. No such notification has been received from the Certifying Authority.

FRNSW confirmed that Cleanaway ResourceCo undertook extensive consultation with FRNSW regarding the Leachate Management Plan and the design of protection systems.

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

3.3 Agency regulatory action

No regulatory action has been undertaken by any agency in relation to the Cleanaway ResourceCo activities at the facility.

Invitation to show cause letter

The EPA has issued to Cleanaway ResourceCo an “invitation to show cause” letter¹, dated 1 February 2019. The “invitation to show cause” letter relates to EPA observations on 14 November 2018 and 24 January 2019 of PEF bales stored on site, outside of the designated storage area, as determined by the site’s OEMP.

Cleanaway ResourceCo responded to the “invitation to show cause” letter, by letter dated 4 February 2019. The Cleanaway ResourceCo response outlined the cause of the bales being stored outside the designated area to be an underestimation of the volume (and the area required) of processed, wrapped and baled PEF identified in the development consent, when compared to the actual volumes being experienced during operations. Cleanaway ResourceCo identified the main reasons for this underestimation and actions underway to reduce the volume of PEF bales stored on site and bring the operations into compliance.

The Cleanaway ResourceCo letter also referred to discussions between the EPA and Cleanaway ResourceCo regarding a variation to the facility’s Environmental Protection Licence (EPL) to expand the designated bales storage area of PEF. The letter also acknowledges that an amendment would be required to the facility’s OEMP and approval would need to be sought from DPE. At the time of drafting this report, Cleanaway ResourceCo was working with the DPE to modify its Approval to increase the bale storage area on the site.

No recommendation has been raised regarding the storage of PEF bales outside of the designated storage area, as determined by the site’s OEMP, as it is the subject of consideration by the EPA and DPE.

3.4 Environmental performance

Environmental performance of the development has been determined by comparison of actual performance versus the predictions made in the EIS. Actual environmental performance has been based on:

- Site monitoring and inspection records
- Records of complaints and incidents.
- Regulatory action
- Agency responses to the invitation to contribute to this audit
- Interview of site personnel and site observations during the audit
- The surrounding environmental and proximity to sensitive receivers

3.4.1 Operations overview

Waste receipt

Waste is only accepted on site from prequalified customers that fulfill the requirements of the NSW Energy from Waste Policy Statement. Customers that arrive to the site report to the weighbridge where the waste type is confirmed to meet the acceptance criteria before the vehicle is permitted to enter the site. All accepted waste is received in the waste receipt area within the process building. A

¹ The Invitation to show cause letter, dated 1 February 2019, was issued after the EPA response to the auditor, dated 29 January 2019, discussed in Section 3.2.2 of this report.

receival inspection officer inspects the waste as it is being unloaded to verify the waste type is consistent with the acceptance criteria. The site inspection confirmed that no unprocessed waste was located outside of the process building and the receival inspection officer was actively monitoring incoming wastes.

Waste processing and storage

All waste processing is undertaken wholly within the process building. Waste processing comprises a series of hoppers, shredders, screens and separators to process accepted waste into separated waste streams including PEF. The process generates high levels of dust and noise. From an occupational health perspective, hearing and respiratory protection is required to enter the process building.

No environmental air, noise or stormwater assessments have been undertaken to determine the actual impact of the facility on the local environment however based on site observations and a review of records, it was determined that:

- Airborne dust and noise generated at the waste receival, processing and storage areas of the building were contained within the building
- Nuisance dust or noise was not detected outside of the building or at the boundaries of the site
- No leachate, other liquid or offensive odour were detected at the receival area within the building, or outside
- Cleanaway ResourceCo has not received any complaints regarding the operation of the facility.

PEF baling and bale storage

The PEF baling and wrapping equipment was located under an awning on the western side of the main process building. At the time of the site inspection, it was observed that:

- The baler generates considerable PEF litter and debris
- Plant operators were sweeping the area surrounding the baler and regularly cleaning-out a waste collection hopper from beneath the guillotine
- Windblown debris was spread along the western driveway and against the western fence over approximately 100m
- Grates over stormwater pits along the western driveway were partially blocked with PEF litter and debris. It was noted that the stormwater pits were fitted with "Drain Wardens" to prevent litter from entering the stormwater system.

Cleanaway ResourceCo submitted a modification to DPE to enclose the PEF baling area. The modification was approved in September 2018. Cleanaway ResourceCo also advised that a project is proposed to install a clean-up conveyer under the baler to catch and remove PEF debris. Costing for the project was complete and was subject to Board approval. The modifications, once implemented, are anticipated to improve the containment of PEF litter and debris from the process.

The facility has a designated PEF storage area outside of the main building for plastic-wrapped PEF bales. At the time of the inspection, it was observed that:

- PEF bales were stored beyond the designated storage area including in the staff car park and along the western wall of the main building.
- The wrapping over some bales was partly damaged, contributing to the PEF litter and debris. Manual patching is undertaken on damaged bales to reduce the generation of debris.

- The quantity of PEF bales present at the site was likely to have exacerbated the windblown PEF litter and debris spread along the western boundary.

On 1 February 2019, the EPA issued Cleanaway ResourceCo with an invitation to show cause letter (dated 1 February 2019) for PEF bales stored on site, outside of the designated storage area. Refer to Section 3.3 for further discussion regarding the EPA concerns and Cleanaway ResourceCo response.

Cleanaway ResourceCo was also working with the Department of Planning to modify its Approval to increase the bale storage area on the site.

Waste streams and disposal

Waste is processed to create the following waste streams, which are sent to waste management facilities or premises lawfully permitted to accept the waste:

- PEF – Boral, Berrima Cement Works
- PEF – international markets (no permit required)
- Scrap metal – Liberty One Steel and Sell & Parker
- Fines and aggregates – MET recycling
- General solid waste – Cleanaway Erskine park

3.4.2 Noise

The Noise Impact Assessment Report² which informed the EIS predicted that noise impacts to residential, active recreational and industrial receivers would meet the relevant noise criterion. The assessment considered sound pressure levels of all plant and equipment operating at the facility, worst case operations and adverse meteorological conditions. It predicted boundary noise levels of 70 and 75 LAeq (dBA).

Cleanaway ResourceCo has undertaken an occupational noise assessment³ of the facility. The assessment concluded that noise levels for personnel working within the process building were deemed extreme to high of developing noise induced hearing loss. It recommended personal hearing protection (PHP) for workers in the interim; and further assessment, health monitoring and the development of a noise management plan in the medium to long term.

The OEMP specifies a requirement to undertake a noise impact assessment to verify the predictions of the EIS however this has not been undertaken. The occupational noise assessment did record noise levels, at eleven locations on the site boundary, where they ranged between 61.9 and 77.8_{LAeq} (dBA). The assessment did not draw any conclusions in relation to the site's noise impact to its industrial neighbours or to residential receivers' further afield.

This audit has determined that noise impacts from the facility to the surrounding receivers, and distant residential receivers was *likely* to be low, based on a review of available records and the following site observations:

- The boundary noise levels recorded by the occupational noise assessment were all below the EIS predicted boundary noise levels except for one, situated on the eastern boundary. It was further observed that a 2-3m high block retaining wall along the eastern boundary of the site was likely to reduce off-site noise impact.

² Wilkinson Murray, Waste and Resource Management Facility, Noise Impact Assessment. Report 15278-N Version A, 28 January 2016.

³ Safe Environments, Preliminary Occupational Hygiene Exposure Assessment for ResourceCo Wetheril Park Plant Report No. R16825, dated 9 August 2018.

- The site is surrounded by industrial receivers with the nearest residential receiver approximately 840m away.
- Noise generated at the waste receipt, processing and storage areas of the building were contained within the building.
- Excess noise generating activities were not observed outside of the process building.
- Cleanaway ResourceCo has not received any noise complaints regarding the operation of the facility.

Refer to Recommendation R-01 in Section 4.1 of the report.

3.4.3 Air quality management

The Air Quality Impact Assessment Report ⁴ (AQIAR) which informed the EIS identified dust and odour as the pollutants with the potential to result in air quality impacts.

Dust emissions

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

The AQIAR predicted that dust generated from the process (handling aggregate materials) would be in the order of 21kg/year, however site observations at the time of the inspection indicated that the waste processing facility was generating dust an order of magnitude higher than predicted. Conveyor covers, foggers and dust extractors were present along the processing line however considerable dust was generated by the plant. It was evident that dust suppression systems were not effectively controlling dust from the plant, to the extent predicted by the EIS. Cleanaway ResourceCo advised that it was continually working to reduce dust generation and mitigation as the dust being generated by the dry waste materials is higher than anticipated during the design phase of the project. Dust mitigation was being pursued for the hammermill with the installation of a new hood and extraction system. The hammermill is a major dust source that is currently not connected to a dust extraction system. ResourceCo also advised that the Double Drum Separator (DDS) is another source of dust generation and new settings on the separator are being trialed.

Cleanaway ResourceCo has undertaken an occupational dust exposure assessment⁵ of the facility (within the process building) however its scope did not enable confirmation of annual dust levels from operational activities and predicted impacts to surrounding receptors. The assessment concluded that dust control options need to be explored (within the process building) and respiratory protection (face masks) should be utilised by workers, in the interim.

Another source of potential dust is the PEF baling and bale storage. The environmental impacts of these activities were previously discussed.

⁴ Wilkinson Murray, Waste and Resource Management Facility, Air Quality Impact Assessment. Report 15278-AQ, Version A, 28 January 2016.

⁵ Workplace Environment Consultants, Exposure to Dust and Silica, Wetherill Park Resource Recovery Facility, 25 September 2018

The following positive site observations were made regarding dust management:

- The building is the primary mitigation measure to control dust to the environment. Airborne dust generated at the waste receipt, processing and storage areas of the building were effectively contained within the building.
- Nuisance dust was not detected outside of the building or at the boundaries of the site, although the weather was calm at the time of the inspections.
- Cleanaway ResourceCo has not received any dust complaints regarding the operation of the facility.
- A maintenance regime for dust suppression and extraction equipment at major dust generation points has been developed.

Most of the dust management controls specified in the OEMP were implemented on site except for:

- A build-up of settled dust and litter was observed around the PEF baler.
- Litter and debris were evident along the western boundary of the site attributable to PEF baler arm storage.
- A manual roller door on the eastern side of the process building was observed to be partly opened and unsupervised.
- A rapid roller door on the western side of the process building remained open during plant operation due to a fault in its operation.

Off-site dust impacts from the site were low at the time of the inspection, however given the capacity of the process to generate high levels of dust, robust dust mitigation measures are necessary to provide assurance that nuisance dust is not generated from site activities in the longer term or in adverse weather conditions.

Refer to Recommendation R-02 in Section 4.1 of the report.

Odour

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

Cleanaway ResourceCo has advised that in practice to date, putrescible waste has been received at the facility, but it had been removed promptly. The site inspection indicated that:

- No putrescible waste was present on the site.
- No odour was detected from the receipts or other areas of the site.
- Cleanaway ResourceCo has not received any odour regarding the operation of the facility.

Therefore, odour impacts from the facility to the surrounding receivers, particularly the residential receivers, was *likely* to be negligible.

3.4.5 Stormwater, leachate and fire water systems

Leachate and fire water

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

Notwithstanding the capacity of the system to isolate contaminated leachate or fire waste from the stormwater system, no leachate has been generated at the facility due to the strict controls in place on incoming waste. The FRNSW has been called to the facility to extinguish a small fire in the primary shredder however it did not amount to fire water runoff. The small quantity of fire water was absorbed by the waste and processed.

Based on the information provided as part of this audit, the leachate and fire water systems were constructed consistently with the requirements of the EIS and RTS. However, the Cleanaway ResourceCo EHS officer was not aware whether a program was in place to periodically exercise the fire water / stormwater isolation valve.

Refer to Improvement opportunity IO-01 in Section 4.2 of the report.

Stormwater system

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

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

The Cleanaway ResourceCo EHS officer for the site advised that:

- Litter inspections were undertaken on an ongoing basis and recorded weekly. Weekly inspection check-sheets were sighted.
- There is a routine program to inspect and clean out the Drain Wardens located within each of the stormwater pits in the designated “dirty areas”.
- There is no routine program to inspect and clean out the HumeGard HG18 GPT and Humes JellyFish JF3000-19-4 Filter.

Refer to Recommendation R-03 in Section 4.1 of the report.

Surface water monitoring

Cleanaway ResourceCo monitor surface water in accordance the pre-commissioning stage of the project as outlined in Section 3.4.1 of the Water Management Plan, however the site has been commissioned since June 2018 and the monitoring should be undertaken in accordance with the commissioning phase. The pre-commissioning phase only monitors stormwater runoff generated from upstream of the site hence no data is available to assess the quality of the stormwater being generated by the site.

Refer to Recommendation R-04 in Section 4.1 of the report.

3.5 Summary of compliance against assessable documents

An assessment of compliance was undertaken for each of the assessable documents and a summary of the compliance status for each document is presented in Table 4. Compliance was assessed using the compliance status descriptors in Section 2.3 of this report.

Table 4 Summary of compliance

Document	Compliant	Non-compliant	Not triggered
Project Approval SSD 7256	41	11	14
EPL No 20937	22	6	22
OEMP and associated sub-plans	28	10	2
Statement of commitments	10	2	-
Environmental Impact Statement	24	1	-
<i>Total</i>	<i>124</i>	<i>30</i>	<i>38</i>

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

The detailed assessment against each of these documents is provided in Appendix A, Tables A1 to A5. A summary of compliance against each of the assessable documents is provided in the following sub-sections.

3.6 Project Approval

Cleanaway ResourceCo demonstrated a high level of compliance against the Project Approval SSD 7256 conditions, as applicable during the reporting period. In particular, a high level of compliance was demonstrated in relation to:

- There have been no complaints or off-site environmental impacts attributable to stormwater discharges, noise, dust, odour or traffic.
- The facility is operating within its limit of consent, it has consulted with all relevant public authorities (as required by the consent) and has maintained an EPL with the EPA.
- The development was in accordance with the approval and relevant construction and occupancy certificates have been obtained from the Certifying Authority, to the extent that verifiable evidence was available for the purpose of this audit.
- Waste management is consistent with the Approval including waste screening and acceptance, waste storage (except PEF storage) and processing, waste disposal and waste monitoring.
- Pest, vermin and noxious weed management have been effectively managed
- The stormwater management system including controls for leachate water and fire water have been installed to the requirements of FRNSW.
- Preparation and implementation of its Operational Environmental Management Plan (OEMP) and associated sub plans. The plans were approved by DP&E in April 2018, prior to commencement of operation.

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

Eleven non-compliances were recorded against the Approval. A summary of the non-compliances (by exception) against the Approval is provided in Table 5.

Table 5 Non-compliances identified with the Approval

Condition	Requirement	Audit finding
A23	<p>The Applicant must ensure that all plant and equipment used for the development is:</p> <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	<p>PEF debris</p> <ul style="list-style-type: none"> • The current plant, processes and practices at the baling area and at the PEF storage locations were not adequate to effectively control the accumulation of PEF debris, although projects are in place to control debris from this area • The concrete pavement along the western boundary of the facility and the staff car park was observed to contain a high loading of PEF debris. The PEF debris had accumulated at stormwater inlets to the extent that some inlets were observed to be blocked although Drain Wardens were installed to prevent debris from entering the stormwater system • During the inspection, operators in the PEF baling area were observed collecting the PEF debris from the ground and emptying the PEF collection bin from beneath the cutting mechanisms however considerable debris including build-up of longer-term dust and debris remained. <p>Stormwater system</p> <ul style="list-style-type: none"> • The stormwater inlets along the western boundary of the site were not being effectively maintained. • There is no routine program to inspect and clean out the HumeGard HG18 GPT and Humes JellyFish JF3000-19-4 Filter
B3	<p>All processed and unprocessed waste must be stored within the building on the site. Processed, wrapped and baled PEF may be stored in the area designated on the approved plans in Appendix 1 for the outdoor storage of PEF.</p>	<p>Baled PEF</p> <ul style="list-style-type: none"> • Processed, wrapped and baled PEF is stored outside however, it is stored in areas beyond those shown in Appendix 1. The bales were stored along the western perimeter of the process building and within the staff carpark. • Cleanaway ResourceCo advised that it is currently storing excess PEF bales as there have been unforeseen delays PEF receipt from its clients and shipping to international markets. Cleanaway ResourceCo was working with the DPE to modify its Approval to increase the bale storage area on the site.
B29	<p>The Applicant must:</p> <ul style="list-style-type: none"> • Implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise 	<p>Noise</p> <p>Most of the noise management controls specified in the OEMP were implemented on site except:</p> <ul style="list-style-type: none"> • A manual roller door on the eastern side of the process building was observed to

Condition	Requirement	Audit finding
	<p>operational, low frequency and traffic noise generated by the development.</p> <ul style="list-style-type: none"> Regularly assess noise emissions and relocated, modify and/or stop operations to ensure compliance with the relevant conditions of this consent. 	<p>be partly opened and unsupervised. The EHS officer advised that this was not a usual process and it may have been opened for access or egress.</p> <ul style="list-style-type: none"> A rapid roller door on the western side of the process building remained open during plant operation due to a fault in its operation. Cleanaway ResourceCo advised that a part to enable repair of the door had arrived on 13/02/18 and had been repaired prior to completion of this report. <p>Noise emissions have not been monitored in accordance with the OEMP. The OEMP specifies that noise monitoring is required once the site is fully operational to gain an appreciation of noise levels and confirm source level estimations in the EIS.</p>
B32 and B35	<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 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>Dust</p> <p>Most of the dust management controls specified in the OEMP were implemented on site except:</p> <ul style="list-style-type: none"> A build-up of settled dust and litter surrounded the PEF baler. Litter and debris were evident along the western boundary of the site attributable to PEF storage. A manual roller door on the eastern side of the process building was observed to be partly opened and unsupervised. The EHS officer advised that it may have been opened for access or egress. A rapid roller door on the western side of the process building remained open during plant operation due to a fault in its operation. Cleanaway ResourceCo advised that the door had been repaired (prior to completion of this report) and operating in accordance with the requirements of the OEMP. <p>Conveyor covers, foggers and dust extractors were present along the processing line however considerable dust was generated from the plant.</p>
B39	<p>Prior to the commencement of operations, the Applicant must provide 42 on-site parking spaces for visitors and staff. Parking areas are to be constructed in accordance with the latest version of AS 2890.1.</p>	<p>Parking</p> <p>42 parking spaces have been provided on site in accordance with the site plans however the car park was being used (in part) for the storage of excess PEF bales at the time of the audit.</p>
B42 and B43	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.</p>	<p>Dangerous good and chemicals</p> <p>Non-compliances with AS 3833:2007 <i>The storage and handling of mixed classes of dangerous goods, in packages and intermediate bulk containers</i>, and the NSW EPA's <i>Storing and Handling of Liquids</i>:</p>

Condition	Requirement	Audit finding
	<p>The Applicant must store all chemicals, fuels and oils used on-site in accordance with:</p> <ul style="list-style-type: none"> (a) all requirements of all relevant Australian Standards; and (b) the NSW EPA's '<i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i>' if the chemicals are liquid. <p>In the event of an inconsistency between the requirements listed from a) to b) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>	<p><i>Environmental Protection – Participants handbook</i> were observed at the time of the inspection including:</p> <ul style="list-style-type: none"> • access to the spill kit was obstructed behind pallets, drums and other workshop material • Class 2 (aerosol cans) and Class 3 (flammable liquids) were stored together in a flammable goods cabinet. They should be stored at least 3 m apart. • The oxygen and acetylene cages located outside of the workshop should be located at least 3m apart. • 205 L drums of oils were observed in the receivals bay of the workshop in an unbunded area.
B46	<p>The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by Condition B45 for the life of the development.</p>	<p>Landscaping</p> <p>The landscape management plan specifies a thin strip along the western boundary of the site to be landscaped with nominated shrubs. Site observations indicate that there was insufficient space between the pavement and the boundary fence to landscape the strip with shrubs. Gravel was placed in the space to prevent the growth of weeds.</p>
C5	<p>The Applicant must operate the development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	<p>Implementation of the OEMP</p> <p>Refer to Table 7 of this report.</p>
C14	<p>The Applicant must make copies of the following publicly available on its website:</p> <ul style="list-style-type: none"> • a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs. 	<p>Publicly available documents</p> <p>A summary of the site's water quality monitoring results was not available on the web-page.</p>

3.8 Environment Protection Licence

ResourceCo demonstrated a high level of compliance against the EPL conditions, as applicable during the reporting period. Detailed findings are provided in Appendix A, Table A2. Six non-compliances were recorded against the EPL. A summary of the non-compliances (by exception) against the EPL is provided in Table 6.

Table 6 Non-compliances identified with the EPL

Condition	Requirement	Audit finding
L2.3	All processed and unprocessed waste must be stored within the building. Processed, wrapped and baled PEF may be stored outside in the designated area to the south of the baler (As marked by the grid in the site plan of Appendix A of "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623)).	PEF bales storage Refer to Section 3.3 of the report.
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: (a) must be maintained in a proper and efficient condition; and (b) must be operated in a proper and efficient manner.	Maintenance Refer to Table 5, Condition A23
O3.1	Activities occurring in or on the Premises must be carried out in a manner that prevents or minimises the generation of dust.	Dust Refer to Table 5, Condition B32 and B33
O6.1	Operations at the Premises must be undertaken in accordance with the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623).	Implementation of the OEMP Refer to Table 7 of this report.
O6.2	By no later than 5 October 2018, the Applicant must engage a suitably qualified person to undertake an audit of the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623). A report detailing the outcomes of the audit must be submitted to the EPA by no later than 7 December 2018	OEMP audit An audit of the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623) has not been undertaken to the specified time frame.
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: (a) the date(s) on which the sample was taken; (b) the time(s) at which the sample was collected; (c) the point at which the sample was taken; and (d) the name of the person who collected the sample.	Monitoring records Records of water quality monitoring, required by the Water Management Plan, are not maintained in a manner consistent with this condition.

3.9 OEMP and associated sub-plans

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

Eight non-compliances were recorded against the OEMP and associated sub-plans. A summary of the non-compliances (by exception) against the OEMP and associated sub-plans is provided in Table 7.

Table 7 Non-compliances identified with the OEMP and associated sub-plans

Section	Requirement	Audit finding
OEMP Section 5.1	<p>Inductions</p> <ul style="list-style-type: none"> All staff and sub-contractors are to be required to attend induction training and pass a competency test <u>prior to commencing work</u>. The induction covers health, safety and environmental requirements. 	<p>EMS awareness is provided to all personnel and staff members. Conducted by the Cleanaway ResourceCo EHS officer. Approximately 50% of employees is labour hire so the EMS awareness package is delivered depending on the schedule of work on site.</p> <p>The training package addressed the key requirements except environmental incidents.</p> <p>There is no commitment to provide environmental retraining.</p>
OEMP Sections 6.5 and 6.6	<p>Waste storage and processing</p> <ul style="list-style-type: none"> All processed and unprocessed waste will be stored within the building on the site. Waste will be secured and maintained within designated waste storage areas at all times and is not to leave the site onto neighbouring public or private properties. Processed, wrapped and baled PEF may be stored in the area designated on the approved plans for the outdoor storage of PEF, as described in Section 6.6. 	Storage of PEF bales exceeded the capacity of the designated area.
OEMP Section 9.5	<p>Noise management</p> <ul style="list-style-type: none"> Keep manufacturing building roller doors closed, except when access or egress from the building is required. Ensure all machinery, plant and equipment is maintained in proper working order in accordance with the manufacturer's requirements Noise monitoring: <ul style="list-style-type: none"> Once the site is fully operational to gain an appreciation of noise levels and confirm source level estimations in the EIS 	Refer to Table 5, Condition B29
OEMP Section 9.6	Air quality management	Refer to Table 5, Condition B35

Section	Requirement	Audit finding
AQMP section 4.	<ul style="list-style-type: none"> • Maintain dust suppression and extraction equipment at major dust generation points in the process • Maintain the dust suppression sprays at key process locations, including conveyors of the processing plant and stockpile sprinklers • Keep manufacturing building roller doors closed, except when access or egress from the building is required. 	
OEMP Section 9.10	<p>Hazard management</p> <ul style="list-style-type: none"> • Ensure all staff are inducted and receive ongoing training via toolbox talks regarding their responsibilities relating to handling, storage and disposal of dangerous goods, hazardous chemicals and spill training • Ensure all hazardous chemicals are stored in accordance with AS 1940 guidelines – including covering, bunding, barriers, signage, etc. where appropriate 	<p>The site inspection confirmed that:</p> <ul style="list-style-type: none"> • Small packaged hazardous substances were not stored in accordance with AS3833:2007 (Refer to Table 5, Condition B42) • Not all personnel on site receive environmental training before commencing work (Refer to Table 7, OEMP Section 5.1)
OEMP Section 9.11	<p>Landscape management</p> <ul style="list-style-type: none"> • Install and maintain the landscaping of the site in accordance with the Landscape Management Plan (Appendix O) 	Refer to Table 5 Condition B46.
OEMP Section 9.12	<p>Litter control</p> <ul style="list-style-type: none"> • Include litter observations in regular site inspections 	Litter observations were undertaken in regular site inspections however the response to litter controls has not been adequate. Considerable litter was evident across the site from the PEF baler and PEF storage.
EfWMP Section 4	<p>PEF Calculation method</p> <p>PEF % ≤ (100% x C&D recycling residuals) + (100% x “no limit mixed C&I” waste) + (50% x “50% mixed C&I” waste) + (25% x mixed C&D waste)</p>	<p>The formula for the September/November report was not consistent with the formula in the EfWMP approved by DPE.</p> <p>It is noted however that the PEF calculation formula was amended in consultation with the EPA.</p>

3.11 Statement of commitments

Cleanaway ResourceCo demonstrated a high level of compliance against the Statement of Commitments, as applicable during the reporting period. Detailed findings are provided in Appendix A, Table A4.

Two non-compliances were recorded against the Statement of Commitments. A summary of the non-compliances (by exception) against the Statement of Commitments is provided in Table 8.

Table 8 Non-compliances identified with the Statement of Commitments

Section	Requirement	Audit finding
Induction and training	<ol style="list-style-type: none"> 1. Environmental induction for all employees and contractors will take place before starting work. 2. Retraining sessions will be undertaken within one month of changes to relevant sections of the EMP. 3. Retraining sessions will be undertaken within one month to persons identified by Complaints Register as not conforming to procedures. 	Inductions Refer to Table 7, OEMP Section 5.1
Noise and Vibration	Implement all measures acoustic impact control contained in Appendix 15 of the EIS as amended by measures contained in Attachment 11 to the RTS as follows: <ul style="list-style-type: none"> • Plant based at the site will be fitted with "quacker" style reversing alarms. 	Noise (OEMP) Plant based at the site will be fitted with "quacker" style reversing alarms. has not been incorporated into the Section 9.5 of the OEMP

3.12 EIS predictions

Cleanaway ResourceCo demonstrated a high level of compliance against the with the EIS predictions, as applicable during the reporting period. Detailed findings are provided in Appendix A, Table A5.

One non-compliance was recorded against the Statement of Commitments. A summary of the non-compliance against the EIS predictions is provided in Table 9.

Table 9 Non-compliances identified with the OEMP and associated sub-plans

EIS Section	Requirement	Audit finding
10.6	The car parking provision on-site meets the maximum parking demand by staff at the mid-afternoon shift change.	Parking Refer to Table 5, Condition B39

3.13 Incidents and complaints

No complaints have been recorded by the facility.

No environmental incidents have been recorded by the facility

3.14 Previous annual reviews and audit reports

This is the first Independent Environmental Audit for the facility. No previous annual reviews or audit reports have been prepared.

3.15 Adequacy of the management plans

Conformance with the approval

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

A high-level review of the plans confirmed full compliance with the approval conditions however several opportunities for improvement were identified:

- OEMP Section 2.2 provides a summary of legislative and statutory requirement. The document would be more informative to Cleanaway ResourceCo operations if guidance was provided on how primary legislation referenced in the OEMP applies to operations.
- OEMP Section 4 sets out the site management structure. The role, responsibility, authority and accountability of all key personnel for the implementation of the OEMP were not clearly articulated.
- OEMP Section 7 outlines procedures to keep the relevant agencies informed about the operation and environmental performance of the development. Communications with the local community has not been addressed.
- OEMP Sections 6.14, 6.15, Appendix S and Appendix P outlines procedures to address incidents and emergency response. They do not identify the notification requirements for DPE in the event of an environmental emergency.
- The key elements of a waste monitoring program have been documented across numerous sections of the OEMP and the EfWMP however the requirements are not readily locatable. A document that collates all the requirements of the Condition B10 into one concise “Waste Monitoring Program” would be beneficial to personnel responsible for the monitoring of incoming wastes.

Refer to opportunity for improvement IO-06 outlined in Section 4.2 of this report

Monitoring implementation of the OEMP

The Cleanaway ResourceCo ESR officer undertakes monthly (Skytrust) and weekly environmental inspections however the checklists used do not address the specific requirement of Section 9 of the OEMP. Several non-compliances identified during this audit may have been avoided with a routine inspection tailored specifically to the requirements of the OEMP.

A detailed monitoring and inspection program should be prepared 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.

Refer to opportunity for improvement IO-08 outlined in Section 4.2 of this report.

Maintenance of plant and equipment

High order strategies in the OEMP include:

- Maintain dust suppression and extraction equipment at major dust generation points in the process
- Maintain the dust suppression sprays at key process locations, including conveyors of the processing plant and stockpile sprinklers

- Maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired
- Assess noise emissions and implement actions to ensure compliance with the relevant conditions of the Development Consent.
- Maintenance of machinery, plant and equipment – as required

The OEMP does not provide guidance to Cleanaway ResourceCo personnel on which plant and equipment must be maintained and monitored for the facility to operate in a proper and efficient manner and meet the its environmental obligations.

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

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

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

Refer to opportunity for improvement IO-09 outlined in Section 4.2 of this report.

3.16 Site inspection

A site inspection of the site was undertaken on 31 January 2019 and 13 February 2019. A photographic record of the site inspections is provided in Appendix E of the report.

4 Recommendations

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

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

4.1 Recommendations to address non-compliance

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

A total of fourteen recommendations have been presented in Table 10 to address non-compliances identified during this audit.

Table 10 Recommendations to address non-compliance

R - #	Reference	Recommendation
R-01	Section 3.4.2 CoA B29 OEMP Section 9.5	Noise Undertake a noise impact assessment to confirm noise source level estimations in the EIS and predicted noise impacts to surrounding receivers.
R-02	Section 3.4.3 CoA B32 CoA B35 EPL O3.1 OEMP Section 9.6 AQMP Section 4	Dust Undertake a dust impact assessment of the facility. The assessment should consider: <ul style="list-style-type: none"> Actual versus estimated annual levels of dust from operational activities and predicted impacts on surrounding receptors. Activities that generate dust and dust sources within those activities Effectiveness of current mitigation measures to control dust at source including process plant and equipment and operating instructions Effectiveness of the maintenance and inspection regime for the dust control systems associated with the plant.
R-03	Section 3.4.4 CoA A23 EPL O2.1	Stormwater Develop a maintenance and inspection regime for the HumeGard HG18 GPT and Humes JellyFish JF3000-19-4 Filter to ensure the stormwater system is maintained in a proper and efficient condition.
R-04	Section 3.4.4 CoA B23 EPL M1.3	Water quality monitoring Undertake the water quality monitoring program in accordance with the commissioning phase of the operation (Section 3.4.1 of the Water Management Plan). Maintain water quality sampling records in accordance with the EPL Condition M1.3.
R-05	CoA A23 CoA B3 EPL O2.1 OEMP Section 9.12	Maintenance along the western boundary <u>In the interim</u> 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.

R - #	Reference	Recommendation
R-06	CoA B39 EIS 10.6	Parking Ensure all on-site parking spaces, as required by the Approval, are always available for visitor and staff parking.
R-07	CoA B42 CoA B43 OEMP Section 9.10	Hazardous Substances Undertake an annual review of all hazardous substances stored on site against the requirements of Condition B43.
R-08	CoA B46 OEMP Section 9.11	Landscaping Provide landscaping to the site as specified in the Landscape Management Plan (LMP). Where this is not feasible, provide an alternate LMP and seek approval from the Department of Planning.
R-09	CoA C14	Web-page information Report 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.
R-10	EPL O6.2	Audit report to the EPA Liaise with the EPA for a revised date for submission of an audit report detailing the outcomes of an OEMP audit.
R-11	OEMP Section 5.1 SoC – I&T	Induction and Training 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.
R-12	SoC – N&V	Quackers Consider the incorporation of the following noise control into the OEMP, as specified in the statement of commitments: <ul style="list-style-type: none"> Plant based at the site will be fitted with "quacker" style reversing alarms.
R-13	CoA B48	Lighting Confirm that the external lighting complies with AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting.
R-14	EfWMP Section 4	EfWMP Calculation Update the EfW calculation method in the EfWMP, so it is consistent with the calculation method approved by the EPA.

4.2 Opportunities for improvement

Opportunities for improvement have been identified where Resource Co has substantively met the relevant requirement however an opportunity to improve the performance of Cleanaway ResourceCo has been identified by the auditor. A total of ten improvement opportunities have been presented in Table 11.

Table 11 Improvement opportunities

IO - #	Reference	Recommendation
IO-01	Section 3.4.4 CoA B21	Exercising the stormwater shut-off valve 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.
IO-02	CoA A7	Customer records - incoming waste Maintain a controlled register of all pre-qualified incoming customers including pertinent information such legal entity (ABN/ACN number) and waste facility licence number.
IO-03	CoA B4	Customer records - outgoing waste 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.
IO-04	CoA B10	Waste Monitoring Program Establish a document that collates all the requirements of the Condition B10 into one concise "Waste Monitoring Program" as a reference for personnel responsible for the monitoring of incoming and outgoing wastes.
IO-05	CoA B30 SoC I&T	Driver Code of Conduct Additional noise controls should be added to the Driver Code of Conduct. These may include controls for noise associated with loading and unloading, keeping voices and music down, idling on site, minimise vehicle maneuvering on site.
IO-06	CoA B42 CoA B43 CoA C4 EPL M1.3 SoC – Objectives Section 3.13	Update the OEMP Revise the OEMP to include: <ul style="list-style-type: none"> • Explicit environmental responsibilities and authorities for key Cleanaway ResourceCo personnel • Procedures to inform the local community of Cleanaway ResourceCo operations, as required. • Consistency in documentation regarding commitment to notify of DPE, in the event of an environmental incident or emergency. • The record keeping requirements of the EPL (Condition M1.2 and M1.3) should be referenced in the OEMP. • In its objectives, include: <ul style="list-style-type: none"> ○ A commitment to new technologies through-out the life of the plant. ○ Extent to which it encourages and facilitates community participation in the recycling of building and construction waste. • 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 • Improved guidance on how primary legislation referenced in the OEMP applies to operations
IO-07	EPL L1.1	Legislation

IO - #	Reference	Recommendation
EPL L5.1		<p>The following Sections of the Protection of the Environment Operations Act 1997 and their obligations should be referenced in the OEMP:</p> <ul style="list-style-type: none"> • Section 120 - Pollution of waters • Section 129 – Potentially offensive odour
IO-08	Section 3.13	<p>Monitoring and inspection program</p> <p>Develop a detailed monitoring and inspection program to capture the commitments made in the OEMP and ensure they are always implemented. The monitoring and inspection program could be structured as a series of checklists for weekly, monthly, quarterly and annual inspections depending on the specific requirement.</p>
IO-09	Section 3.13	<p>Maintenance of plant and equipment</p> <p>The OEMP should identify (or reference documents which identify) critical plant and equipment and for each item, specify:</p> <ul style="list-style-type: none"> • An inspection regime to monitor its performance / effectiveness • Maintenance requirements to ensure Cleanaway ResourceCo meets its environmental obligations. <p>Critical plant and equipment may include apparatus to control dust, noise and stormwater treatment.</p>

Appendix A – Independent audit tables

Appendix A: Table A1 - SSD 7256 Compliance Table

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
PART A ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
A1	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the development.		<p>Several corrective actions have been identified to reduce on-site environmental impact however these have not been shown to cause off-site impacts hence ResourceCo has complied with this condition. It was confirmed that:</p> <ul style="list-style-type: none"> No evidence of off-site environmental impacts was observed at the time of the site inspections or from records maintained by the site. No complaints have been received from the facility. <p>There has been no incident at the facility which may have triggered actions to minimise environmental harm.</p>	Compliant
TERMS OF CONSENT				
A2	<p>The Applicant, in acting on this consent, must carry out the development in accordance with the:</p> <ul style="list-style-type: none"> (a) Development Application (SSD 7256); (b) EIS; (c) RTS; (d) conditions in Schedule 2; (e) Modification Assessments (f) development layout plans and drawings listed at Appendix 1; and (g) the Management and Mitigation Measures as identified in Appendix 2. 		ResourceCo has demonstrated a high level of compliance with the documents listed in this condition. A number of non-compliances have been awarded as described in Tables A1 to A5 of this appendix and summarised in Sections 3.6 to 3.10 of the report.	Non-compliant
A3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.		No inconsistencies were identified.	Not triggered

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status																														
A4	<p>The Applicant must comply with all written requirement(s) of the Planning Secretary arising from the Department's assessment of:</p> <p>(a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent;</p> <p>(b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the consent; and</p> <p>(c) the implementation of any actions or measures contained in these documents.</p>	DPE letter of approval, 17/12/2018.	<p>The DPE letter to ResourceCo dated 17/12/18 granted an extension of time for the submission of the EIA until 5pm 6 March 2019. The due date had not been triggered at the time of preparing this EIA.</p> <p>No other written requirement has been submitted from the Department to ResourceCo.</p>	Not triggered																														
LIMITS OF CONSENT																																		
A5	This consent lapses five years after the date from which it operates, unless the development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EP&A Act.		This consent was approved in April 2017. The development commenced construction within 5 years.	Compliant																														
A6	The Applicant must not receive or process on the site more than 250,000 tonnes per annum (tpa) of waste, as defined in this consent.	<p>Monthly reports to the EPA:</p> <ul style="list-style-type: none"> WCMR: ResourceCo RRF – 20937 -2018-06 WCMR: ResourceCo RRF – 20937 -2018-07 WCMR: ResourceCo RRF – 20937 -2018-08 WCMR: ResourceCo RRF – 20937 -2018-09 WCMR: ResourceCo RRF – 20937 -2018-10 WCMR: ResourceCo RRF – 20937 -2018-11 WCMR: ResourceCo RRF – 20937 -2018-12 	<p>ResourceCo has reported to the EPA that it has received or processed the following waste (per month):</p> <table border="1"> <thead> <tr> <th>Period</th> <th>Received (t)</th> <th>Processed (t)</th> </tr> </thead> <tbody> <tr> <td>2018-06</td> <td>1462.4</td> <td>499</td> </tr> <tr> <td>2018-07</td> <td>2619.02</td> <td>2422</td> </tr> <tr> <td>2018-08</td> <td>3859.32</td> <td>4070</td> </tr> <tr> <td>2018-09</td> <td>4575.7</td> <td>4935</td> </tr> <tr> <td>2018-10</td> <td>6300.1</td> <td>5726</td> </tr> <tr> <td>2018-11</td> <td>6887.41</td> <td>0</td> </tr> <tr> <td>2018-12</td> <td>7448.38</td> <td>6765</td> </tr> <tr> <td>Total 2018-06 to 2018-12 (tonnes)</td> <td>33152.33</td> <td>24417</td> </tr> <tr> <td>Predicted (tpa)</td> <td>66304.66</td> <td>48834</td> </tr> </tbody> </table> <p>The receipt and processing rates to date, are within the allowable tonnes per annum rate.</p>	Period	Received (t)	Processed (t)	2018-06	1462.4	499	2018-07	2619.02	2422	2018-08	3859.32	4070	2018-09	4575.7	4935	2018-10	6300.1	5726	2018-11	6887.41	0	2018-12	7448.38	6765	Total 2018-06 to 2018-12 (tonnes)	33152.33	24417	Predicted (tpa)	66304.66	48834	Compliant
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Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
A7	Incoming waste must only be transported to the site in trucks from pre-qualified customers delivering targeted waste streams, in line with Table 1 of the NSW Energy from Waste Policy Statement.	<p>Incoming waste pre-qualification form template (Form 49 Version 3.0, 21/07/2018).</p> <p>Customer prequalification list (uncontrolled word document).</p> <p>Monthly reports to the EPA (see Condition A6)</p> <p>Services Rendered reports for August 2018 and December 2018.</p> <p>Incoming waste customer pre-qualification form for RMS - Cheap and Quick</p> <p>Incoming waste customer pre-qualification form for MacLean Waste Management</p> <p>Incoming waste customer pre-qualification form for SUEZ Recycling & Recovery</p> <p>Incoming waste customer pre-qualification form for Doyle Bros,</p> <p>Incoming waste customer pre-qualification form for Shred X</p> <p>Incoming waste customer pre-qualification form for Fast skips (The Trustee for the McDonnell Family).</p>	<p>ResourceCo procedures require all customers to prequalify using the waste prequalification form. The form seeks information from each customer in line with Table 1 of the NSW Energy from Waste Policy Statement. Prequalified customers are assigned a customer registration number which is recorded when the customer presents at the weigh bridge. A sample of customer registration forms was sighted for:</p> <ul style="list-style-type: none"> • RMS - Cheap and Quick • MacLean Waste Management • SUEZ Recycling & Recovery <p><i>It was observed that pertinent information to confirm legal entity and EPL licence number was not recorded on the form.</i></p> <p>All trucks accessing the site must pass the weigh bridge and the weigh bridge operator is required to verify the customer (source of waste) and the waste type. Only prequalified customers are accepted onto the site.</p> <p>ResourceCo presented a Customer Prequalification List (uncontrolled word document) for the purposes of the audit. The list was cross-checked against Services Rendered reports for August and December 2018 (sample review). It confirmed that all customers were listed on the customer prequalification list except for Doyle Bros, Shred X and The Trustee for the McDonnell Family. Incoming waste customer pre-qualification forms were later provided for Doyle Bros, Shred X and Fast skips (The Trustee for the McDonnell Family).</p> <p>Refer to Improvement opportunity IO-02 in Section 4.2 of the report.</p>	Compliant
STAGED SUBMISSION OF PLANS OR PROGRAMS				
A8	With the approval of the Planning Secretary, the Applicant may:		There was no staging of the OEMP and supporting sub-plans.	Not triggered

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>(a) submit any strategy, plan or program required by this consent on a progressive basis; and/or</p> <p>(b) combine any strategy, plan or program required by this consent.</p>			
A9	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined must be demonstrated.		There was no staging of the OEMP and supporting sub-plans.	Not triggered
EVIDENCE OF CONSULTATION				
A10	<p>Where consultation with any public authority is required by the conditions of this consent, the Applicant must:</p> <p>(a) consult with the relevant public authority prior to submitting the required documentation to the Planning Secretary or the PCA for approval, where required;</p> <p>(b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and</p> <p>(c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this development consent.</p>	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p><i>Energy from Waste Management Plan</i>, GHD, 27 February 2018, Version 6</p> <p><i>Water Management Plan</i>, GHD, 9 March 2018, Version 3</p> <p><i>Leachate Management Plan</i>, GHD, 12 March 2018, Version 3</p> <p><i>Air Quality Management Plan</i>, GHD, 22 February 2018, Version 1</p> <p><i>Landscape Management Plan</i>, GHD, 22 February 2018, Version 1</p>	Consultation was required with public authorities for the preparation of the OEMP and associated subplans. Records of the consultation and actions to address the matters raised by the public authorities was attached as an appendix to the OEMP and associated the sub-plans.	Compliant
DISPUTE RESOLUTION				
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		No disputes 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 were referred to the Planning Secretary.	Not triggered

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	determination of any such dispute shall be final and binding on the parties.			
STATUTORY REQUIREMENTS				
A12.	The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	EPA Environmental Protection Licence (EPL) No. 20937, 14 May 2018	ResourceCo maintain an EPL with the EPA. No other licences, approval or permits were identified by the EIS or the DPE's Environmental Assessment Report for the development.	Compliant
DEMOLITION				
A13.	The Applicant must ensure that all demolition associated with the development is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version and the requirements of the Work Health and Safety Regulation, 2011.		Demolition – beyond the scope of this audit	
STRUCTURAL ADEQUACY AND CERTIFICATION				
A14	The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA.	Steve Watson and Partners, <i>Final Occupation Certificate</i> 16/1688/02, dated 11 June 2018.	Final Occupation Certificate 16/1688/02– Steve Watson and Partners certifies that: <ul style="list-style-type: none"> • They have been appointed as the Principal Certifying Authority under section 109E. • The have taken into consideration the health and safety of the occupants of the building. • A Development Consent or Complying Development Certificate is in force with respect to the building. • A Construction Certificate has been issued with respect to the plans and specifications for the building. • The building is suitable for occupation or use in accordance with its classification under the Building Code of Australia. • Where required, a Final Fire Safety Certificate has been issued for the building or an Interim Fire Safety Certificate has been issued for the relevant part of the building. • Where required, a report from the Commissioner of Fire Brigades has been considered. 	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
A15	Prior to the commencement of construction, the final design of the development must be finalised in consultation with and to the satisfaction of Fire and Rescue NSW and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of Volume One of the <i>National Construction Code (NCC) Series</i> .	Steve Watson and Partners, <i>Construction Certificate 16/1688/01</i> , dated 1 June 2017. Steve Watson and Partners, <i>Construction Certificate 16/1688/02</i> , dated 13 October 2017.	Stage 1 Construction Certificate 16/1688/01, dated 1 June 2017, for main works issue for the construction of new waste and resource management facility excludes smoke hazard management provisions. Stage 2 Construction Certificate 16/1688/02, dated 13 October 2017, for main works issue for the construction of new waste and resource management facility, incorporates F&R NSW approval.	Compliant
A16	Prior to the issue of a Construction Certificate for a building or structure, a Construction Certificate (Engineering Approval) must be submitted to the Certifying Authority for the construction of a new inlet pit and alteration of an existing pit and the connection of the drainage pipe into the existing stormwater drainage pipe within the easement, laybacks, access driveways and replacement of damaged footpaths, in accordance with approved plans.	Triaxial consulting, Stormwater drainage – installation certificate dated 27 April 2018 LANDdata Surveys. Drainage as built survey for 35-37 Frank Street Wetherill Park	Certificate confirmed stormwater drainage undertaken to BCA2016 Clause F1.1 and AS/NZS 3500.3.2 and council requirements as part of Development consent and DCP	Compliant
A17	Prior to the construction of any utility works associated with the development, the Applicant must obtain the relevant approvals from service providers.		Construction – beyond the scope of the audit	
A18	Prior to the commencement of operation, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.	Subdivider/developer compliance certificate under Division 9 Section 73 of the Sydney Water Act, 1994,. Case 161781, dated 9 June 2017.	The Section 73 certificate confirms water facilities are available, sewerage facilities are available.	Compliant
A19	Prior to the issue of the Final Occupation Certificate, adjustments to any public utilities necessitated by the development are to be completed in accordance with the requirements of the relevant Authority. Any utility costs are to be at no cost to Council.		ResourceCo advised that there were no adjustments to public utilities. Fairfield Council did not respond to an invitation to comment. This could not be verified at the time of the audit.	Not triggered
PROTECTION OF PUBLIC INFRASTRUCTURE				
A20	Prior to the commencement of earthworks, the Applicant must: ...		Construction – beyond the scope of the audit	
A21	The Applicant must: (a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the development; and		Construction – beyond the scope of the audit There was not evidence of damage to public infrastructure at the time of the inspection.	Not triggered

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.			
DEVELOPMENT CONTRIBUTIONS				
A22	<p>Prior to the issue of a Construction Certificate for any part of the development, the Applicant must pay \$241,930 to Council in accordance with the Fairfield City Council Indirect (Section 94A) Development Contributions Plan 2011.</p> <p><i>Note: The contribution amount payable may be adjusted at the date of payment. Any unpaid contributions will be adjusted on a quarterly basis to account for movements in the Australian Bureau of Statistics, Producer Price Index - Building Construction (New South Wales).</i></p>	<p>Email from Steve Watson and Partners and MRS Property dated 27/06/2017.</p> <p>Photo of receipt from Fairfield City Council #02798260:0001 dated 27/06/2017 (amount not specified).</p>	<p>Email from Steve Watson and Partners and MRS Property and attached receipt from advised receipt was for payment of s94A Levy for \$241,930 for 35-37 Frank Street Wetherill Park.</p>	Compliant
OPERATION OF PLANT AND EQUIPMENT				
A23	<p>The Applicant must ensure that all plant and equipment used for the development is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>	<p>Interviews</p> <p>Site inspection</p>	<p>The facility was generally maintained in a proper and efficient condition and operated in a proper and efficient manner consistent with the requirements of the OEMP and associated sub-plans. This audit confirmed that:</p> <ul style="list-style-type: none"> Waste receivals was effectively managed within the waste receivals area. The area was ordered and effectively controlled. Wastes streams were effectively maintained in designated areas and stockpiles (except for PEF bales) Waste processing was operational at the time of the audit. Production records indicate that wastes processing has continued to rise on a monthly basis, although they are within the maximum allowable tonnage for the facility. Site landscaping was well maintained. <p>The following issues were identified by this audit that need to be addressed by ResourceCo, in order to comply with this condition:</p> <p>Dust management</p> <p>There was no visible dust outside of the process building however significant air borne and settled dust was observed</p>	Non-compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
			<p>within the building, particularly around the process equipment. Refer to Section 3.4.3 of the report for further discussion.</p> <p>The site maintenance supervisor advised that ResourceCo is working towards implementing the MEX process for scheduling maintenance works on the site. MEX is a computerised maintenance management system designed specifically to manage all maintenance of plant assets. A review of the MEX system confirmed that dust management plant was scheduled for maintenance including:</p> <ul style="list-style-type: none"> • Double drum separator • Single drum separator • Replace filter sleeves on dust collection unit #1 • Conveyors visual inspection (covers) <p>The extent to which the MEX system encompasses the full extent of the key dust management controls was not determined by this audit.</p> <p>Stormwater system</p> <p>The stormwater system has designated “clean” and “dirty” areas. Stormwater pits in the dirty areas contained <i>Drain Wardens</i> which prevent debris from entering the system. Further, drains from the dirty areas report to a series of in-line stormwater treatment devices (<i>HumeGard HG18 GPT</i> and <i>Humes JellyFish JF3000-19-4 filter</i>), before discharging off site.</p> <p>The ResourceCo EHS officer advised that:</p> <ul style="list-style-type: none"> • Litter inspections were undertaken on an ongoing basis and recorded weekly. Weekly inspection check-sheets were sighted. • There is a routine program to inspect and clean out the Drain Wardens located within each of the stormwater pits in the designated “dirty areas”. • There is no routine program to inspect and clean out the HumeGard HG18 GPT and Humes JellyFish JF3000-19-4 Filter. 	

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
			<p>It was also observed that the stormwater inlets along the western boundary of the site were not being effectively maintained.</p> <p>Refer to Recommendation R-03 in Section 4.1 of the report.</p> <p>PEF debris</p> <p>The concrete pavement along the western boundary of the facility and the staff car park was observed to contain a high loading of PEF debris. This area was used for the baling PEF and storage of baled PEF. The PEF debris had accumulated at stormwater inlets to the extent that some inlets were observed to be blocked.</p> <p>At the time of the inspections, weather conditions were calm hence no wind blown dust, litter or debris was evident. No windblown litter or debris attributable to PEF was evident off-site.</p> <p>During the inspection, operators in the PEF baling area were observed collecting the PEF debris from the ground and emptying the PEF collection bin from beneath the cutting mechanisms however considerable debris including build-up of longer-term dust and debris remained. The site has an industrial street sweeper however it was not deployed at the time of the inspection.</p> <p>The current plant, processes and practices at the baling area and at the PEF storage locations were not adequate to effectively control the accumulation of PEF debris.</p> <p>ResourceCo submitted a modification to enclose the PEF baling area. The modification was approved in September 2018 which is anticipated to improve the containment of PEF litter and debris from the process.</p> <p>On 1 February 2019, the EPA issued ResourceCo with an invitation to show cause letter (dated 1 February 2019) for PEF bales stored on site, outside of the designated storage area. Refer to Section 3.3. of the report for further discussion regarding the EPA concerns and ResourceCo response.</p> <p>Refer to Recommendation R-05 in Section 4.1 of the report.</p>	

SURRENDER OF CONSENTS

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
A24	In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant must and in the manner prescribed by clause 97 of the EP&A Regulation, surrender all current development consents associated with the site prior to the issue of an Occupation Certificate for the development.		Site personnel were not aware of any development consents that were required to be surrendered.	Not triggered
PART B: ENVIRONMENTAL PERFORMANCE AND MANAGEMENT				
WASTE MANAGEMENT				
Waste Screening and Acceptance				
B1	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) implement auditable procedures to: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and ii. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited wastes such as asbestos. 	<p><i>Energy from Waste Management Plan</i>, GHD, 27 February 2018, Version 6</p>	<p>Refer to Table A1, Condition A7.</p> <p>During the site inspection, it was observed that a waste “spotter” monitors the unloading of waste in the receivals for any unauthorised wastes being received on site.</p> <p>The EHS officer advised that the facility has not received any hazardous wastes. All loads carrying hazardous material have been identified and rejected at the weighbridge or waste receival area.</p> <p>Site observations confirmed that the waste-spotter screens and removes wastes such as gas cylinders, batteries and liquid containers.</p>	Compliant
Waste Storage and Processing				
B2	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	<p>Approved plans in Appendix 1 of SSD 7256.</p> <p>Site Inspection</p>	<p>All waste and resultant waste streams were secured and maintained within the waste receival area, designated waste bins and product stockpile area within the processing building.</p> <p>Baled PEF product was not maintained within the designated baled PEF storage area (refer to Table A1, Condition B3), however there was no visible evidence at the time of the</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
			inspection that litter and debris from the bales was leaving the site onto neighbouring public or private properties.	
B3	All processed and unprocessed waste must be stored within the building on the site. Processed, wrapped and baled PEF may be stored in the area designated on the approved plans in Appendix 1 for the outdoor storage of PEF.	Approved plans in Appendix 1 of SSD 7256 Site Inspection	<p>All waste is stored in designated bins within the building.</p> <p>Processed, wrapped and baled PEF is stored outside however, it is stored in areas beyond those shown in Appendix 1. The bales were stored along the western perimeter of the processing building and within the staff carpark.</p> <p>ResourceCo advised that it is currently storing excess PEF bales as there have been unforeseen delays PEF receipt from its clients and shipping to international markets.</p> <p>ResourceCo notified the EPA that PEF materials are being stored outside of the designated area identified in the OEMP.</p> <p>Refer to Section 3.3 of the report for further discussion.</p> <p>Refer to Recommendation R-05 in Section 4.1 of the report.</p>	Non-compliant
Statutory Requirements				
B4	All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste.	Service Rendered report - Outgoing, December 2018 https://www.epa.nsw.gov.au/licensing-and-regulation/public-registers/about-prpoeo/list-of-licences Letter from Department of Environment and Energy (DEE) dated 1 August 2016 titled	<p>ResourceCo advised that all waste streams from the facility are sent to a waste management facility or premises lawfully permitted to accept the waste.</p> <p>A review of records of outgoing wastes for December 2018 confirmed the following materials were sent to the following authorised destinations:</p> <ul style="list-style-type: none"> • PEF – Boral, Berrima Cement Works – EPL 1698 (refuse derived fuel) • General solid waste (non-putrescible) – Cleanaway, Erskine Park – EPL 4865 • Scrap metal: <ul style="list-style-type: none"> ○ Liberty One Steel, Wetherill Park – EPL 1977 ○ Liberty One Steel, Hexham – EPL 5345 ○ Sell & Parker, Kings Park – EPL 11555 • Fines and aggregates - MET Recycling, Silverwater – EPL 20948 (building and demolition waste) 	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
			<ul style="list-style-type: none"> PEF exported to international markets was not considered hazardous by DEE and therefore did not require a permit to export. <p><i>Refer to Improvement opportunity IO-03 in Section 4.2 of the report.</i></p>	
B5.	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal except as expressly permitted by an EPL.		Refer to Table A1 Condition A7	Compliant
B6.	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	<p>Services Rendered report, August 2018</p> <p>Services Rendered report, December 2018.</p> <p>Weigh bridge ticket list ResourceCo_Wetherill 2018-09-18T06_14_44</p>	Services Rendered report from weigh bridge records amount of waste (in tonnes) received at the site daily.	Compliant
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.	<p>Services Rendered report, August 2018</p> <p>Services Rendered report, December 2018.</p> <p>Weigh bridge ticket list ResourceCo_Wetherill 2018-09-18T06_14_44</p>	<p>Services Rendered reports and weighbridge records included waste classification data. All wastes are prequalified hence no sampling of received waste is undertaken.</p> <p>Records since commencement of operations were available.</p>	Compliant
Energy from Waste Management Plan				
B8	<p>Prior to the commencement of operations, the Applicant must prepare an Energy from Waste Management Plan (EfWMP). The EfWMP must:</p> <p>(a) be prepared in consultation with the EPA and to the satisfaction of the Planning Secretary;</p> <p>(b) detail the procedures to ensure full and ongoing compliance with the NSW Energy from <i>Waste Policy</i>, including:</p> <p>i. details of how the receipt of incoming waste (feedstock) from waste processing facilities or collection systems complies with the resource recovery criteria specified in Table 1 of the</p>	<p><i>Energy from Waste Management Plan</i>, GHD, 27 February 2018, Version 6</p>	<p>The operation commenced in June 2018 and the plans were approved April 2018. A review of the plans confirmed:</p> <ul style="list-style-type: none"> Appendix H of the EfWMP provides evidence of consultation with the EPA during preparation of the plan. Section 3 of the EfWMP outlines procedures associated with receipt of incoming waste Section 4 and Appendix B of the EfWMP outlines procedures to compile incoming waste reports for the EPA 	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>EPA's <i>Energy from Waste Policy Statement</i> for each waste stream;</p> <p>ii. details of how the Applicant will compile and calculate percentages of incoming waste streams every three months and retain this information for submission to the EPA on request;</p> <p>iii. a procedure for providing evidence to the EPA that incoming material was previously going to landfill;</p> <p>iv. a procedure for the management of out of specification PEF; and</p> <p>v. a requirement that out of specification PEF material would not be reprocessed until further analysis demonstrates that it meets the relevant criteria.</p> <p>(c) define calibration procedures and operating thresholds for the online analyser that will be used to measure real-time chlorine, calorific value and moisture content of the PEF.</p>		<ul style="list-style-type: none"> Section 8 of the EfWMP provides procedures for managing out-of-specification waste. Appendix C of the EFWMP defines a calibration procedure for monitoring equipment. 	
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 EfWMP was implemented for the audit period. Refer to Table A3.	Compliant
Waste Monitoring Program				
B10	<p>From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development. The program must:</p> <p>(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;</p> <p>(b) include suitable provision to monitor on a daily basis the:</p> <p>i. quantity, type and source of waste received on site; and</p> <p>ii. quantity, type, quality and destination of the outputs produced on site;</p> <p>(c) ensure that:</p> <p>i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and</p>	<p><i>Energy from Waste Management Plan</i>, GHD, 27 February 2018, Version 6</p>	<p>The operation commenced in June 2018 and the plans were approved April 2018.</p> <p>A review of the plans confirmed all requirements of the Waste Monitoring Program (condition B10) are addressed in the OEMP and EfWMP. However, the requirements were not readily locatable. It was noted that:</p> <ul style="list-style-type: none"> Section 3.1.4 of the EfWMP titled the "Waste monitoring program" identifies records to be kept on file for all incoming wastes received. Section 6.2.4 of the OEMP titled the "Waste monitoring program" identifies records to be kept on file for all incoming waste, outgoing waste and training materials. 	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> ii. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste, including asbestos; and iii. require that all weighbridge data be retained for the life of the development and be made immediately available on request to the Planning Secretary and/or the EPA. 		<ul style="list-style-type: none"> • Section 3.1.3 of the EfWMP all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site. • Section 5 of the EfWMP specifies that weighbridge data will be retained. • Section 7 of the OEMP specifies that all weighbridge records will be retained for the life of the development. <p><i>Refer to Improvement opportunity IO-4 in Section 4.2 of the report.</i></p>	
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 Planning Secretary. The plan must form part of the CEMP required by Condition C1 and must: ...		Construction – Beyond the scope of the audit	
Pests, Vermin and Noxious Weed Management				
B12	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area. <p><i>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</i></p>	<p>Bug Stop Industrial Extermination Report # 108827 dated 11/12/18.</p> <p>Client Services Agreement with Pickwick Security Services and Integrated site services scope</p> <p>Site inspection</p>	<p>A contractor, Bug Stop, is engaged to undertake a program for pest and vermin control. No pests or vermin were observed at the time of the inspection. Bates were observed at the perimeter of the main building.</p> <p>Most of the site is paved with hardstand. No noxious weeds were observed at the time of the inspection. The main landscaped area at the front of the property was planted with prescribed vegetation and mulched. No weeds were evident.</p> <p>Pickwick Security Services provides integrated services including landscape maintenance and pavement sweeping (via an industrial sweeper).</p>	Compliant
SOILS AND WATER				
Imported Soil				
B13	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site; 		Construction – Beyond the scope of the audit	

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Department upon request. 			
Erosion and Sediment Control				
B14	Prior to the commencement of earthworks, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: <i>Soils and Construction Guideline</i> and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.		Construction – Beyond the scope of the audit	N/A
Discharge Limits				
B15	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	<i>Water Management Plan</i> , GHD, 9 March 2018, Version 3.	<p>There have been no incidents which may cause a breach of Section 120 of the POEO Act.</p> <p>Refer to Table A1, Condition B16 and B17 for further discussion on the stormwater system.</p>	Compliant
Stormwater Management System				
B16	<p>The Applicant must design, install and operate a stormwater management system for the development. The system must:</p> <ul style="list-style-type: none"> (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 <i>Managing Urban Stormwater- Soils and Construction</i> 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. 	<p>Steve Watson and Partners, <i>Final Occupation Certificate</i> 16/1688/02, dated 11 June 2018.</p> <p>Triaxial consulting, <i>Stormwater Drainage Installation Certificate</i>, dated 27/04/2018.</p> <p>Site observations</p>	<p>The Final Occupation Certificate 16/1688/02 and the Stormwater Drainage Installation Certificate, dated 27/04/2018 confirmed the site's leachate, firewater and stormwater systems are constructed in accordance with the commitment in the EIS and RTS.</p> <p>Site observations confirmed that stormwater pits and associated controls were located on the site accordance with the plans. Inspections of sub-surface apparatus within the pits was not undertaken.</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
B17	<p>Prior to the issue of a Construction Certificate, a certificate must be submitted to the Certifying Authority certifying that:</p> <p>(a) satisfactory arrangements have been made for the disposal of stormwater;</p> <p>(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</p> <p>(c) the piped drainage system has been designed to Council's Stormwater Drainage Policy.</p>	<p>Triaxial consulting, <i>Stormwater Drainage Installation Certificate</i>, dated 27/04/2018.</p>	<p>Certificate provided</p>	<p>Compliant</p>
B18	<p>Prior to the issue of the Final Occupation Certificate, Works-As-Executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved must be submitted to the Certifying Authority.</p>	<p>As-built drawings Triaxial consulting, <i>Pavement plan TX-11972.00-C4.0, C4.1 and C4.3.</i></p> <p>Triaxial consulting, <i>Stormwater drainage - Installation certificate</i> dated 27/04/18.</p> <p><i>Perimeter vehicle access for emergency vehicles - Installation certificate</i> dated 27/04/18</p>	<p>Certificates and as-built drawings have been provided by Triaxial Consulting confirming:</p> <ul style="list-style-type: none"> Stormwater drainage built in accordance with normal engineering practice and meets the requirements of BCA, fire safety report, Australian Standards and the conditions of the Development consent. Perimeter vehicle access for emergency vehicles has been completed in accordance with nominated standards of performance 	
B19	<p>The stormwater drainage generated from the development must be directed to:</p> <p>(a) the drainage easement; and</p> <p>(b) Council's street kerb and gutter.</p>		<p>Refer to B16</p>	<p>Compliant</p>
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>	<p>Site inspection</p>	<p>Stormwater drains/pits on the site were labelled with the message; "This pit drains to the Georges River" with 100mm high yellow lettering.</p>	<p>Compliant</p>
Leachate Management Plan				
B21	<p>Prior to the commencement of operation, the Applicant must prepare a Leachate Management Plan for the management of leachate and</p>	<p><i>Leachate Management Plan</i>, GHD, 12 March 2018, Version 3.</p>	<p>The operation commenced in June 2018 and the plans were approved April 2018. A review of the plans confirmed</p>	<p>Compliant</p>

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>firewater at the site, including any possible leachate generated around the baling and wrapping area. The leachate system must:</p> <ul style="list-style-type: none"> (a) be designed by a suitably qualified and experienced person(s) in consultation with FRNSW; (b) provide a management protocol for leachate and firewater; (c) control leachate and firewater so that they do not mix with any stormwater on the site; and (d) include water quality monitoring to determine the performance of the leachate management system. 	<p>Letter of approval, DPE, 17/03/2018</p>	<ul style="list-style-type: none"> • Leachate system designed in consultation with FRNSW. Correspondence from FRNSW was attached as Appendix C of the LMP. • Section 3 of the LMP outlines the management protocol for leachate and fire water. • Section 3 of the LMP includes infrastructure and operational strategies for isolating fire water and any leachate from the stormwater system. • Section 4 of the LMP outlines a monitoring program that will be implemented to evaluate the performance of the leachate management system. <p><i>Whilst not a requirement of Condition B21, 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.</i></p> <p>Refer to Improvement opportunity IO-01 in Section 4.2 of the report.</p> <p>The EHS officer advised that the fire brigade was called to the site to extinguish a small fire within the receivals area of the building. The small quantity of fire water was contained within the building and absorbed by the waste. No fire fighting water was released into the stormwater system or tankered off site.</p>	
Water Management Plan				
B22	<p>Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must:</p> <ul 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; 	<p><i>Water Management Plan</i>, GHD, 9 March 2018, Version 3</p> <p>Letter of approval, DPE, 17/03/2018</p>	<p>The operation commenced in June 2018 and the plans were approved April 2018. A review of the plans confirmed:</p> <ul style="list-style-type: none"> • The WMP forms part of the OEMP. Consultation with DPI is attached to the WMP as Appendix C. • Section 2 of the WMP outlines water use, metering, disposal and management on-site including water demand and water use • Section 2.5 of the WMP outlines water licence requirements 	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>(e) detail the management of wastewater streams on-site, including leachate and firewater;</p> <p>(f) contain a Surface Water Management Plan, including;</p> <p>i. a program to monitor:</p> <ul style="list-style-type: none"> • surface water flows and quality; and • surface water storage and use; <p>ii. (ii) sediment and erosion control plans;</p> <p>iii. (iii) surface water impact assessment criteria, including trigger levels for investigating potential adverse surface water impacts; and</p> <p>iv. (iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria.</p>		<ul style="list-style-type: none"> • Section 2.2 of the WMP outlines management of wastewater streams on-site, including leachate and firewater. Further detail is provided in the Leachate Management plan. <p>Section 3 of the WMP incorporates a Surface Water Management Plan (SWMP).</p> <ul style="list-style-type: none"> • The SWMP includes a program to monitor and understand in detail surface water quality. • No monitoring is identified to monitor surface water flows, storage and use. Section 4.2 of the Leachate Management Plan states that rainfall data will be maintained and if required by the NSW EPA, calculations of estimated volume discharged from the site could be performed. • Appendix B to the WMP incorporates an Erosion and Sediment Control Plans for the construction phase of this project. • Section 3.6 of the WMP identifies a protocol for the investigation and mitigation of identified exceedances. 	
B23	The Applicant shall ensure the Water Management Plan (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the development.	<p><i>Water Management Plan</i>, GHD, 9 March 2018, Version 3</p> <p>Field parameter testing results 19/06/18 to 28/11/18.</p> <p>SAL Laboratory data for samples taken on 28/11/18.</p> <p>EMP Weekly inspections reports</p> <p>SkyTrust monthly inspection report (October 2018)</p>	<p>The key requirements of the plan relate to system design and installation, ongoing monitoring of performance and reporting. These key elements of the plan have been implemented.</p> <p>The EHS coordinator undertakes the following periodic inspections:</p> <ul style="list-style-type: none"> • Weekly inspections covering general site hygiene including drains and pavements • Monthly inspections recorded in SkyTrust <p>It is also noted that ResourceCo continues to monitor in accordance the pre-commissioning stage as outlined in Section 3.4.1 of the plan, as it is within the 12 months commissioning stage specified in the plan. However, the site has been commissioned since June 2018 hence monitoring should be undertaken in accordance with the commissioning phase.</p> <p>The pre-commissioning phase only monitors stormwaters generated from upstream of the site hence no data is available</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
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to assess the quality of the stormwater being generated at the site.

Given the ambiguity in the plan, water quality monitoring has been deemed compliant with the plan however a recommendation has been raised to switch to the commissioning stage monitoring for water quality.

Refer to Recommendation R-04 in Section 4.1 of the report.

NOISE

Construction and Operation Hours

B24	<p>The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary.</p> <p><i>Table 1: Hours of Work</i></p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Earthworks and construction</td> <td>Monday – Friday</td> <td>7:00 am to 6:00 pm</td> </tr> <tr> <td>Saturday</td> <td>8:00 am to 1:00 pm</td> </tr> <tr> <td>Operation – waste receipt</td> <td>Monday – Saturday</td> <td>5:00 am to 5:00 pm</td> </tr> <tr> <td rowspan="3">Operation – waste processing (plant operation)</td> <td>Monday – Friday</td> <td>6:00 am to 10.30 pm</td> </tr> <tr> <td>Saturday</td> <td>6:00 am to 5:00 pm</td> </tr> <tr> <td>Sunday</td> <td>8:00 am to 6:00 pm</td> </tr> <tr> <td rowspan="2">Operation – removal of materials</td> <td>Monday – Friday</td> <td>5:00 am to 10.30 pm (PEF only) 5:00 am to 5:00 pm (recyclable materials and residual waste)</td> </tr> <tr> <td>Saturday and Sunday</td> <td>No PEF, recyclable materials and/or residual waste removal</td> </tr> </tbody> </table>	Activity	Day	Time	Earthworks and construction	Monday – Friday	7:00 am to 6:00 pm	Saturday	8:00 am to 1:00 pm	Operation – waste receipt	Monday – Saturday	5:00 am to 5:00 pm	Operation – waste processing (plant operation)	Monday – Friday	6:00 am to 10.30 pm	Saturday	6:00 am to 5:00 pm	Sunday	8:00 am to 6:00 pm	Operation – removal of materials	Monday – Friday	5:00 am to 10.30 pm (PEF only) 5:00 am to 5:00 pm (recyclable materials and residual waste)	Saturday and Sunday	No PEF, recyclable materials and/or residual waste removal	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p>Weigh bridge ticket list ResourceCo_Wetherill 2018-09-18T06_14_44</p>	<p>Construction hours - beyond the scope of this audit.</p> <p>Section 6.1.1 of the OEMP stated the operating hours consistent with the requirement of Condition B24.</p> <p>The operating hours in the EPL is consistent with the Condition B24.</p> <p>Site personnel advised that operations on site are consistent with the stated operating hours. A sample of weigh bridge reports weighbridge reports for 18/09/2018 confirmed receipts did not commence before 6am.</p>	Complaint
Activity	Day	Time																									
Earthworks and construction	Monday – Friday	7:00 am to 6:00 pm																									
	Saturday	8:00 am to 1:00 pm																									
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	Saturday and Sunday	No PEF, recyclable materials and/or residual waste removal																									

B25	<p>Works outside of the hours identified in Condition B24 may be undertaken in the following circumstances:</p> <ul style="list-style-type: none"> (a) works that are inaudible at the nearest sensitive receivers; (b) works agreed to in writing by the Planning Secretary; (c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (d) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm. 	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p>	<p>Section 6.1.1 of the OEMP stated the exceptions to the operating hours consistent with the requirement of Condition B25.</p> <p>Site personnel advise that no incidents have occurred to trigger this clause.</p>	Not triggered
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Construction Noise Limits

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status										
B26	<p>The development must be constructed to achieve the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (Department of Environment and Climate Change, 2009)...</p> <p>All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in the EIS.</p>		Construction noise – beyond the scope of this audit.											
Construction Noise Management														
B27	<p>Prior to the commencement of construction, the Applicant must consult with neighbouring properties regarding the scheduling of high noise generating construction works such as excavation and bulk earth works. The Applicant must provide to the Department with the results of such consultation before construction commences.</p>		Construction noise – beyond the scope of this audit.											
Operational Noise Limits														
B28	<p>The Applicant must ensure that noise generated by the operation of the development does not exceed the noise limits in Table 2.</p> <p>Table 2: Noise Limits dB(A)</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day L_{Aeq}(15 minute)</th> <th>Evening L_{Aeq}(15 minute)</th> <th>Night L_{Aeq}(15 minute)</th> <th>Night L_{A1}(1 minute)</th> </tr> </thead> <tbody> <tr> <td>All residential receivers</td> <td>35</td> <td>35</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Note: Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.</p>	Location	Day L _{Aeq} (15 minute)	Evening L _{Aeq} (15 minute)	Night L _{Aeq} (15 minute)	Night L _{A1} (1 minute)	All residential receivers	35	35	35	45	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p>Safe Environments, Preliminary Occupational Hygiene Exposure Assessment for ResourceCo Wetherill Park Plant Report No. R16825, dated 9 August 2018.</p>	<p>Section 9.5 of the OEMP states the environmental management commitments as they relate to noise including the noise limits.</p> <p>In the absence of monitoring data (refer to Table A1, Condition B28):</p> <ul style="list-style-type: none"> The EIS predicted that noise impacts to residential, active recreational and industrial receivers would meet the relevant noise criterion. No noise complaints have been received by the facility. The facility is located within an industrial area and the nearest sensitive receiver (residential areas) are located approximately 840m from the site. <p>It is <u>not likely</u> that activities occurring at the facility would generate noise at the sensitive receiver to exceed 35 dBA L_{Aeq}(15 minutes).</p>	Compliant
Location	Day L _{Aeq} (15 minute)	Evening L _{Aeq} (15 minute)	Night L _{Aeq} (15 minute)	Night L _{A1} (1 minute)										
All residential receivers	35	35	35	45										
Noise Mitigation														
B29	<p>The Applicant must:</p> <p>(a) implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and</p>	Site inspection	Section 9.5 of the OEMP identifies noise management strategies and monitoring requirements, which may be deemed reasonable and feasible.	Non-Compliant										

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>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) 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</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>		<p>The majority of the noise management controls specified in the OEMP were implemented on site except:</p> <ul style="list-style-type: none"> A manual roller door on the eastern side of the processing building was observed to be partly opened and unsupervised. The EHS officer advised that it may have been opened for access or egress. A rapid roller door on the western side of the processing building remained open during plant operation due to a fault in its operation. ResourceCo advised that a part to enable repair of the door had arrived on 13/02/18. <p>In addition, noise emissions have not been monitored in accordance with the OEMP. The OEMP specifies that noise monitoring is required:</p> <ul style="list-style-type: none"> 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 EPA Based on receipt of a valid noise complaint If any significant changes are made onsite which increases noise levels. <p>Therefore, noise monitoring should be undertaken as the facility is fully operational. An occupational exposure assessment for noise was undertaken of operations however its scope did not address the requirements of the OEMP (Noise Impact Assessments).</p> <p>Refer to Recommendation R-01 in Section 4.1 of the report.</p>	Compliant
Road Traffic Noise				
B30	<p>Prior to the commencement of construction, the Applicant must prepare a Driver Code of Conduct and induction training for the development to minimise road traffic noise.</p> <p>The Applicant must update the Driver Code of Conduct and induction training for construction and operation and must implement the Code of Conduct for the life of the development.</p>	<p>PROC 42 - <i>Driver Code of Conduct</i>, Version 1.0, 30/11/2017</p> <p>Forn 61 - <i>Truck Driver induction</i>, Version 1, 04/10/17</p> <p>A copy of a completed form to be provided.</p>	<p>Construction noise – beyond the scope of this audit.</p> <p>A driver code of conduct is available on the ResourceCo web-page. The code of conduct addresses hours of operation, speed limits a range of other safety controls.</p> <p>A driver code of conduct form is provided to all drivers entering the facility. The form does not specify any environmental controls.</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
<i>Refer to Improvement opportunity IO-05 in Section 4.2 of the report.</i>				
AIR QUALITY				
Meteorological Station				
B31	Prior to the commencement of any works on-site, the Applicant must install and subsequently maintain during the life of the development, a suitable meteorological station on the site that complies with the requirements in the EPA's <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i> .	Site inspection	<p>A weather station is located on the roof of the weigh bridge office (ClimeMet Weather station Model XC0369).</p> <p>No documentation was available at the time of the audit to verify whether the weather station complied with the requirements in the EPA's <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i>.</p> <p><i>Compliance status limitation: ResourceCo had not assessed whether the weather station complied with the requirements in the EPA's <i>Approved Methods for Sampling of Air Pollutants in New South Wales</i>.</i></p>	Compliant
Dust Minimisation				
B32	The Applicant must implement all reasonable and feasible measures to minimise dust generated during demolition, earthworks, construction and operation of the development.	<p>Workplace Environment Consultants, Exposure to Dust and Silica, Wetherill Park Resource Recovery Facility, 25 September 2018</p> <p><i>Air Quality Management Plan</i>, GHD, 22 February 2018, Version 1</p> <p>Site inspection</p>	<p>Demolition and construction dust – beyond the scope of this audit.</p> <p>The site has not received any complaints in relation dust. During the site inspection, there was no visible airborne dust evident outside of the process building however there has been no environmental monitoring for dust impacts from the operation.</p> <p>During the site inspection, dust within the processing building was observed to be significant. Refer to Section 3.4.3 of the report and Table A1, Condition B35.</p> <p><i>Refer to Recommendation R-02 in Section 4.1 of the report.</i></p>	Non-compliant
B33	During construction, the Applicant must ensure that: ...		Construction dust – beyond the scope of this audit.	
Air Quality Management Plan				
B34	Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6. The AQMP must:	<i>Air Quality Management Plan</i> , GHD, 22 February 2018, Version 1	<ul style="list-style-type: none"> Section 3.3 of the AQMP provides ranking for emission sources. 	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	(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: <ol style="list-style-type: none"> 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. 		<ul style="list-style-type: none"> • Section 4 (Table 9) of the AQMP identifies control measures. The predicted emissions (dust and odour) are considered negligible. • Section 5 of the AQMP provides performance monitoring details. It also provides detail on KPIs, frequency of monitoring, record keeping, complaints register and response procedures. 	
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.	<i>Air Quality Management Plan, GHD, 22 February 2018, Version 1</i> Site inspection	The OEMP and AQMP provide detail on the reasonable and feasible measures to minimise dust during operations. During the site inspection, there was no visible airborne dust evident outside of the process building. It was observed that: <ul style="list-style-type: none"> • Speed limits on site were restricted to 10km/hr and vehicle loads were covered. No visible dust was generated from vehicle movement on site. • The site was paved with limited exposed surfaces except for some pavement repairs however the areas were not observed to be generating airborne dust. • Good housekeeping in the receivals area to minimise tracking of dust and debris from the building. • No dust was not observed escaping from the processing building. • Drop heights for loading and unloading were observed to be kept to a minimum. However, it was also observed that:	Non-compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
<ul style="list-style-type: none"> A build-up of settled dust and litter surrounded the PEF baler. Litter and debris were evident along the western boundary of the site attributable to PEF storage. A manual roller door on the eastern side of the processing building was observed to be partly opened and unsupervised. The EHS officer advised that it may have been opened for access or egress. A rapid roller door on the western side of the processing building remained open during plant operation due to a fault in its operation. ResourceCo advised that a part to enable repair of the door had arrived on 13/02/18 A maintenance regime for dust suppression and extraction equipment at major dust generation points and key process locations has not been developed. <p>Conveyor covers, foggers and dust extractors were present along the processing line however considerable dust was generated from the plant. The CEO ResourceCo Sustainable Energy advised that dust generation from the plant was consistent with this type of plant.</p> <p>Refer to Recommendation R-02 in Section 4.1 of the report.</p>				
Odour Management				
B36	The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	<i>Air Quality Management Plan, GHD, 22 February 2018, Version 1</i>	Modelling outlined in the AQMP predicts odour from the facility to be negligible.	Compliant
No offensive odours were emanating from the site at the time of the inspection. There are no records of odour complaints from surrounding businesses.				
TRAFFIC AND ACCESS				
Roadworks and Access				
B37	All vehicular crossings must be located a minimum of one metre from any utility pillar/pole. Prior to the commencement of construction, the Applicant must prepare detailed design plans to the satisfaction of Council, demonstrating the		Construction dust – beyond the scope of this audit.	

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>access width is in accordance with AS 2890.2-2002 to accommodate the turning path of the largest servicing vehicle.</p> <p>The Applicant must also liaise with Council's Subdivision Branch regarding replacing the drainage pit grate located within the western vehicular crossing.</p>			
B38	All trucks leaving the operational site must depart via a wheel wash facility to prevent mud, dust or debris from being deposited on Council roads. The wheel wash facility must be designed and constructed in consultation with Council and to the satisfaction of the Planning Secretary prior to commencement of operations.	Site inspection	A wheel wash on site was observed at the time of the site inspection. The wheel wash was full of clean water and operational. There was no evidence of mud tracking or debris downstream of the wheel wash.	Compliant
Parking				
B39	Prior to the commencement of operations, the Applicant must provide 42 on-site parking spaces for visitors and staff. Parking areas are to be constructed in accordance with the latest version of AS 2890.1.	Do they meet the requirements of AS2890.1	<p>42 parking spaces have been provided on site in accordance with the site plans however:</p> <ul style="list-style-type: none"> during the first site visit on XX/2/19 they were not available for visitors and staff as the area was being utilised for the storage of PEF bales during the second site visit on 13/2/19 some of the bales had been relocated from the parking area and some staff parking was available. <p>Off-street office parking was available at the front the facility. Street parking was available for any overflow of the office parking area.</p> <p>Refer to Recommendation R-06 in Section 4.1 of the report.</p>	Non-compliant
Construction Traffic Management Plan				
B40	The Applicant must prepare a Construction Traffic Management Plan for the development to the satisfaction of the Planning Secretary prior to the commencement of construction. The plan must form part of the CEMP required by Condition C1 and must: ...		Construction TMP – beyond the scope of this audit.	
Operating Conditions				
B41	The Applicant must ensure: <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 	Site inspection	<p>Compliance with design standards were not assessed as part of this audit.</p> <p>It was confirmed during the site inspection that:</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>and maintained in accordance with the latest version of AS 2890.1 and AS 2890.2;</p> <p>(b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTRROADS guidelines;</p> <p>(c) the development does not result in any vehicles queuing on the public road network;</p> <p>(d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site;</p> <p>(e) all vehicles are wholly contained on site before being required to stop;</p> <p>(f) all loading and unloading of waste and other materials is carried out on-site;</p> <p>(g) all vehicular entries and exits must be made in a forward direction;</p> <p>(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</p> <p>(i) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.</p>		<ul style="list-style-type: none"> The development did not result in any vehicles queuing on the public road network. Heavy vehicles and bins associated with the development were not parked on local roads or footpaths in the vicinity of the site. Vehicles were wholly contained on site before being required to stop. Loading and unloading of waste and other materials is carried out on-site. Vehicular entries and exits were made in a forward direction. Trucks entering or leaving the site with loads had their loads covered and did not track dirt onto the public road network. An effective wheel wash was in place. <p>Please refer to Table A1, Condition 39 in relation to the staff car park.</p>	

HAZARDS AND RISK

Dangerous Goods

B42	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p><i>PROC31 – Pollution Incident Response Management Plan</i>, Version 1.1, 11/07/2018.</p>	<p>Section 9.10 of the OEMP outlines an environmental management strategy for Dangerous Goods.</p> <p>Section 9.10.2 of the OEMP refers to the AS1940 but other relevant Australian standards or EPA guides are referenced.</p> <p>The Pollution Incident Response Management Plan identifies and ranks the risks on site with respect to dangerous goods and hazardous substances including 22,000L diesel tank, Class 3 substances and 205L drums of hydraulic oils.</p> <p>The OEMP does not reference the Pollution Incident Response Management Plan and other relevant ResourceCo procedures associated with the management of dangerous goods and hazardous substances.</p> <p>The PIRMP was last tested on 12 July 2018.</p>	Non-compliant
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Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
			<p>On site, it was observed that except for the bulk diesel tank, other hazardous substances were minor in quantity. The diesel tank was double skinned and its refuelling area was appropriately bunded.</p> <p>The following non-compliances with AS 3833:2007 <i>The storage and handling of mixed classes of dangerous goods, in packages and intermediate bulk containers</i>, and the NSW EPA's <i>'Storing and Handling of Liquids: Environmental Protection – Participants handbook'</i> were observed at the time of the first inspection:</p> <ul style="list-style-type: none"> • access to the spill kit was obstructed behind pallets, drums and other workshop material • Class 2 (aerosol cans) and Class 3 (flammable liquids) were stored together in a flammable goods cabinet. They should be stored at least 3 m apart. • The oxygen and acetylene cages located outside of the workshop should be located at least 3m apart. • 205 L drums of oils were observed in the receivals bay of the workshop in an unbunded area. <p>On the second inspection, it was observed that:</p> <ul style="list-style-type: none"> • the spill kit had been relocated so it was easily accessible • all 205L drums were located on portable bunds or within a bunded area. <p>Refer to Recommendation R-07 in Section 4.1 of the report.</p> <p>Refer to Improvement opportunity IO-06 in Section 4.2 of the report.</p>	
Further Requirements				
B43	<p>The Applicant must store all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) all requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's <i>'Storing and Handling of Liquids: Environmental Protection – Participants Handbook'</i> if the chemicals are liquid.</p>		Refer to Table A1, Condition B42	Non-complaint

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
<p>In the event of an inconsistency between the requirements listed from a) to b) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>				
<p>CONTAMINATION</p>				
B44	<p>Prior to the commencement of construction, the Applicant must prepare an unexpected finds protocol to ensure that potentially contaminated material is appropriately managed. The protocol must form part of the CEMP required by Condition C1 and must ensure any material identified as contaminated shall be disposed off-site, with the disposal location and results of testing submitted to Council, prior to its removal from the site.</p>		<p>Construction - beyond the scope of this audit</p>	
<p>VISUAL AMENITY</p>				
<p>Landscaping</p>				
B45	<p>Prior to the commencement of operation, the Applicant must prepare a Landscape Management Plan to manage the landscaping works on-site, to the satisfaction of the Planning Secretary. The plan must form part of the OEMP in Condition C4 and be prepared in accordance with Condition C6. The plan must:</p> <ul style="list-style-type: none"> (a) detail the species to be planted on-site; (b) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and (c) be consistent with the Applicant's Management and Mitigation Measures at Appendix 2. 	<p><i>Landscape Management Plan</i>, GHD, 22 February 2018, Version 1</p>	<p>Section 5.2 of the plan details the species to be planted</p> <p>Section 6 of the LMP describes monitoring and maintenance measures</p> <p>Section 5 of the plan specifies planting on site in accordance with the Plant Schedule on Drawing 0215-0954 LD 200, which is consistent with the tree retention and landscaping works as detailed in drawings prepared by Tract Landscape Architects as contained in Appendix 12 of the EIS, as amended by plans contained in Attachment 15 to the RTS.</p>	<p>Compliant</p>
B46	<p>The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by Condition B45 for the life of the development.</p>	<p>Client Services Agreement with Pickwick Security Services and Integrated site services scope</p> <p>Site inspection</p>	<p>The landscape management plan specifies a thin strip along the western boundary of the site to be landscaped with nominated shrubs. Site observations indicate that there was insufficient space between the pavement and the boundary fence to landscape the strip with shrubs. Gravel was placed in the space to prevent the growth of weeds.</p> <p>Otherwise, the site inspection confirmed that the landscaped areas of the site were well maintained and free of weeds and litter.</p> <p>Refer to Recommendation R-08 in Section 4.1 of the report.</p>	<p>Non-compliant</p>
<p>Building Materials</p>				

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
B47	The Applicant must carry out the development in accordance with the External Material Schedule shown on drawing numbers SK1103, SK3101 and SK3102 in Appendix 1, unless otherwise agreed by the Planning Secretary.	Site observations.	<p>The external material schedule on the drawing attached to MOD1 state for the Manufacturing and workshop building:</p> <ul style="list-style-type: none"> • Metal components such as External claddings downpipes, cappings and shutters were colour bond (Colour – Surfmist) • External walls were precast concrete panels (colour – natural concrete) <p>Office building was:</p> <ul style="list-style-type: none"> • Aluminium components were light grey, woodland grey in colour • Metal components were surf mist in colour • External timber slatting were natural stain in colour • Concrete walls were rough form timber or rendered. <p>During the site inspection, it was confirmed that external finishes were generally consistent with the materials schedule.</p>	Compliant
Lighting				
B48	<p>The Applicant must ensure the lighting associated with the development:</p> <p>(a) complies with the latest version of AS 4282 (INT) - <i>Control of Obtrusive Effects of Outdoor Lighting</i>; and is</p> <p>(b) mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.</p>	<p>Confirm lighting compliance with AS 4282 (INT)</p> <p>QI Electrical Services Lighting (General) - installation certificate dated 18 April 2018</p>	<p>The light installation certificate reported the lighting had been completed in accordance with BCA2016, AS1680.0-2009 and AS2293.1-2005.</p> <p>No evidence was available to confirm that the lighting complies with AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting.</p> <p>Refer to Recommendation R-13 in Section 4.1 of the report.</p>	Non-compliant
PART C: ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN				
C1	The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Planning Secretary. The CEMP must: ...		Construction – beyond the scope of this audit.	

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
C2	As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following: ...		Construction – beyond the scope of this audit.	
C3	The Applicant must carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.		Construction – beyond the scope of this audit.	
OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN				
C4	<p>The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Planning Secretary. The OEMP must:</p> <ul style="list-style-type: none"> (a) be submitted to the Planning Secretary for approval prior to the commencement of operation; (b) be prepared by a suitably qualified and experienced expert; (c) provide the strategic framework for environmental management of the development; (d) identify the statutory approvals that apply to the development; (e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (f) describe the procedures that would be implemented to: <ul style="list-style-type: none"> i. keep the local community and relevant agencies informed about the operation and environmental performance of the development; ii. receive, handle, respond to, and record complaints; iii. resolve any disputes that may arise; iv. respond to any non-compliance; v. respond to emergencies; and (g) include the following environmental management plans: <ul style="list-style-type: none"> i. Energy from Waste (see Condition B8); ii. Air Quality (see Condition B34); 	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p><i>Energy from Waste Management Plan</i>, GHD, 27 February 2018, Version 6</p> <p><i>Water Management Plan</i>, GHD, 9 March 2018, Version 3</p> <p><i>Leachate Management Plan</i>, GHD, 12 March 2018, Version 3</p> <p><i>Air Quality Management Plan</i>, GHD, 22 February 2018, Version 1</p> <p><i>Landscape Management Plan</i>, GHD, 22 February 2018, Version 1</p> <p>PROC31 – Pollution Incident Response Management Plan, Version 1.1, 11/07/2018.</p> <p>Letter of approval, DPE, 17/03/2018.</p>	<p>The plans were submitted to DPE on 17 November 2017, prior to commencement of operation in June 2018. The plans were approved by DPE on 17/03/2018.</p> <ul style="list-style-type: none"> • The OEMP was prepared by the waste section of GHD Pty Ltd, suitably qualified and experienced experts. • Section 1.4 of the OEMP provides an overview of the Resource Co strategic framework and how the OEMP sits within the broader corporate structure, as an overarching management document for the site. • Section 2.2 of the OEMP sets out the legislative and other statutory requirements • Section 4 of the OEMP sets out the site management structure. • Section 7 of the OEMP outlines procedures to keep the relevant agencies informed about the operation and environmental performance of the development. • Section 9.9 of the OEMP outlines procedures to address complaints and disputes • Section 8.5 of the OEMP outlines procedures to address any non-compliance • Sections 6.14, 6.15, Appendix S and Appendix P of the OEMP outlines procedures to address incidents and emergency response. <p>The subplans were attached to the OEMP. Refer to relevant sections of Table A3 for an assessment of the sub-plans</p> <p>Refer to Section 3.13 of the report for improvement opportunities related to the OEMP and associated sub-plans.</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> iii. Water (see Condition B22); and iv. Leachate (see Condition B21). 		<i>Refer to Improvement opportunity IO-06 in Section 4.2 of the report.</i>	
C5	The Applicant must operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.	OEMP and associated sub-plans	<p>ResourceCo operated the facility on accordance with the OEMP, to a high level. A detailed assessment is provided in Table A3.</p> <p>However, non-conformances were recorded for:</p> <ul style="list-style-type: none"> • Inductions • Storage of PEF bales • the implementation of mitigation measures related to dust, noise, hazard management, litter • landscaping • noise monitoring <p><i>Refer to relevant sub-plans for recommendations</i></p>	Non-compliant
MANAGEMENT PLAN REQUIREMENTS				
C6	<p>The Applicant must ensure that the environmental management plans required under Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include:</p> <ul style="list-style-type: none"> (a) detailed baseline data; (b) a description of: <ul style="list-style-type: none"> i. the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. any relevant limits or performance measures/criteria; and iii. the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; (c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria; (d) a program to monitor and report on the: 	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p><i>Water Management Plan</i>, GHD, 9 March 2018, Version 3</p> <p><i>Leachate Management Plan</i>, GHD, 12 March 2018, Version 3</p> <p><i>Air Quality Management Plan</i>, GHD, 22 February 2018, Version 1</p> <p><i>Landscape Management Plan</i>, GHD, 22 February 2018, Version 1</p>	<p>A high-level review of the OEMP and associated sub-plans, confirmed that the plans were prepared in accordance with Condition C6.</p> <p>It was observed that whilst the relevant legislation was listed in the OEMP, how that legislation applied to the development was not explicit.</p> <p><i>Refer to Improvement opportunity IO-05 in Section 4.2 of the report.</i></p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> i. impacts and environmental performance of the development; and ii. effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: <ul style="list-style-type: none"> i. incidents; ii. complaints; iii. non-compliances with statutory requirements; and iv. exceedances of the impact assessment criteria and/or performance criteria; and v. a protocol for periodic review of the plan. 			
Revision of Strategies, Plans and Programs				
C7	<p>Within three months of:</p> <ul style="list-style-type: none"> (a) approval of a modification; (b) approval of an annual review under Condition C8; (c) submission of an incident report under Condition C1; or (d) completion of an audit under Condition C12, <p>the Applicant must review, and if necessary, revise, the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i></p>		These events had not occurred during the audit period.	Not triggered
ANNUAL REVIEW				
C8	Each year, the Applicant must review the environmental performance of the development to the satisfaction of the Planning Secretary. This review must: ...	When did the operation commence?	Operations commenced in June 2018. The annual review is due on June 2019.	Not triggered

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> (a) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the next year; (b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against the: <ul style="list-style-type: none"> i. the relevant statutory requirements, limits or performance measures/criteria; ii. requirements of any plan or program required under this consent; iii. the monitoring results of previous years; and iv. the relevant predictions in the EIS; (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the development; (e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the development. 			
REPORTING				
Incident Reporting				
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>Have there been any reportable incidents.</p> <p>Were they reported immediately after the applicant became aware?</p>	<p>No incidents have occurred on site that warranted reporting to DP or the EPA.</p> <p>It is noted that Sections 6.14, 6.15, Appendix S and Appendix P of the OEMP outlines procedures to address incidents and emergency response. They do not identify that notification of DPE is required in the event of an environmental emergency. Refer to C4.</p>	Not triggered

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
C10	Within seven days of the date of this incident, the Applicant must provide the Planning Secretary and any relevant agencies with a detailed report on the incident.		No incidents have occurred on site that warranted reporting to DP or the EPA.	Not triggered
Regular Reporting				
C11	The Applicant must provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	<p>Is regular reporting provided on the web-page?</p> <p>Is reporting in accordance with the OEMP and other management plans?</p>	The OEMP and associated plans do not specify any reporting on the environmental performance of the development on its website	Not triggered
AUDITING				
Independent Environmental Audit				
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: This audit team must be led by a suitably qualified auditor and include relevant experts in any other fields specified by the Planning Secretary.</p>	DPE letter of approval, 17/12/2018. A copy of the letter is attached as Appendix B of this report.	<p>The DPE letter to ResourceCo dated 17/12/18 approved the nominated auditor.</p> <p>The EIA responds the requirements of Condition C12. Refer to Table 1 of the report.</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
C13	Within two months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report.	DPE letter of approval, 17/12/2018. A copy of the letter is attached as Appendix B of this report.	<p>The DPE letter to ResourceCo dated 17/12/18 granted an extension of time for the submission of the EIA until 5pm 6 March 2019.</p> <p>The DPE email to ResourceCo dated 26 February 2019 approves the extension of time for the ResourceCo IEA submission to COB 19 March 2019.</p> <p>The due date had not been triggered at the time of finalising this EIA.</p>	Not triggered

ACCESS TO INFORMATION

C14	<p>The Applicant must make copies of the following publicly available on its website:</p> <p>(a) the documents referred to in Condition A2;</p> <ol style="list-style-type: none"> i. all current statutory approvals for the development; ii. all approved strategies, plans and programs required under the conditions of this consent; iii. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; iv. a complaints register updated on a monthly basis; v. the annual reviews of the development; vi. any independent environmental audit of the development and the Applicant's response to the recommendations in any audit; vii. any other matter required by the Planning Secretary; and <p>(b) keep this information up to date, to the satisfaction of the Planning Secretary.</p>	<ul style="list-style-type: none"> • Development Application (SSD 7256) and associated schedules and appendices (signed) • <i>EPA Environmental Protection Licence (EPL) No. 20937, 14 May 2018</i> • <i>Operational Environmental Management Plan, GHD, 14 March 2018, Version 5</i> • <i>Water Management Plan, GHD, 9 March 2018, Version 3</i> • <i>Leachate Management Plan, GHD, 12 March 2018, Version 3</i> • <i>Air Quality Management Plan, GHD, 22 February 2018, Version 1</i> • <i>Landscape Management Plan, GHD, 22 February 2018, Version 1</i> 	<p>The following documents were publicly available on the ResourceCo web site on 30 January 2019:</p> <ul style="list-style-type: none"> • Development Application (SSD 7256) and associated schedules and appendices (signed) • <i>EPA Environmental Protection Licence (EPL) No. 20937, 14 May 2018</i> • <i>Operational Environmental Management Plan, GHD, 14 March 2018, Version 5 and associated subplans</i> • <i>PROC31 – Pollution Incident Response Management Plan, Version 1.1, 11/07/2018.</i> • <i>PROC 42 - Driver Code of Conduct, Version 1.0, 30/11/2017</i> • Register of environmental complaints up to August 2018. ResourceCo advised records are updated following quality review. • Environmental Impact Statement titled <i>Waste and Resource Management Facility SSO 15-7256</i>, ResourceCo Pty Ltd dated 8 March 2016 • Response to Submissions titled <i>Response to Submissions Waste and Resource Management Facility SSD 15-7256</i>, ResourceCo Pty Ltd dated 28 November 2016. <p>The following information is not required to be maintained on the site:</p>	Non-compliant
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Approval (ID)	Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> • <i>PROC31 – Pollution Incident Response Management Plan, Version 1.1, 11/07/2018.</i> • <i>PROC 42 - Driver Code of Conduct, Version 1.0, 30/11/2017</i> • Register of environmental complaints 	<ul style="list-style-type: none"> • the annual reviews independent environmental audit of the development as they had not been triggered by the conditions of consent • no other record has been requested by the Planning Secretary <p>A summary of the site's monitoring results was not available on the web-page. Examples of this type of information would be stormwater monitoring data and any other monitoring undertaken by ResourceCo in accordance with the OEMP and associated sub plan.</p> <p>Resource Co advised the auditor that some monitoring data required by the management plans may be considered commercial in confidence.</p> <p><i>Refer to Recommendation R-09 in Section 4.1 of the report.</i></p>	

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

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
1	ADMINISTRATIVE CONDITIONS			
A1	What the licence authorises and regulates			
A1.1	<p>This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2:</p> <p>Construction of a waste processing facility including warehouse, workshop and office complex.</p>		Note	
A1.2	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <p>Scheduled activity-</p> <ul style="list-style-type: none"> Resource recovery Waste storage 	<p>Confirm only the following scheduled activities are undertaken on the premises:</p> <ul style="list-style-type: none"> Resource recovery Waste storage 	No other scheduled activities were identified on site.	Compliant
A2	Premises or plant to which this licence applies			
A2.1	<p>Licence applies to the following premises:</p> <p>RESOURCECO 35-37 France Street Wetherill Park NSW 2164 Lot 31 DP 589097</p>			Compliant
A3	Information supplied by the EPA			
A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.		Beyond the scope of the audit	

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<p>In this condition the reference to "the licence application" includes a reference to:</p> <p>(a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>(b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of the licence.</p>			
2	LIMIT CONDITIONS			
L1	Pollution of waters			
L1.1	<p>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.</p>		<p>Refer to Table A1 Condition B15</p> <p><i>Refer to Improvement opportunity IO-07 in Section 4.2 of the report.</i></p>	Compliant
L1.2	<p>Prior to the commencement of works, the Licensee must ensure that any EPL conditions reflect and permit the works conducted on site, including with respect to condition L1.1 and O5.</p>		<p>ResourceCo reviewed the Licence prior to commencement of works.</p>	Compliant
L2	Waste			
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</p> <ul style="list-style-type: none"> • Synthetic fibre waste (from materials such as fibreglass, polyesters and other plastics), but excluding asbestos • Wood waste • Glass, plastic, rubber, plasterboard, ceramics, bricks, concrete or metal • Paper or cardboard • Building and demolition waste 		<p>Refer to Table 1 Condition B9</p>	Compliant
L2.2	<p>The authorised amount of waste permitted on the Premises cannot exceed 7,000 tonnes at any one time.</p>	<p>How do you undertake stocktake of total waste on site?</p>		

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
L2.3	All processed and unprocessed waste must be stored within the building. Processed, wrapped and baled PEF may be stored outside in the designated area to the south of the baler (As marked by the grid in the site plan of Appendix A of "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623)).	Site inspection	Refer to Section 3.3 of the report.	Non-compliant
L2.4	The total amount of waste received at the premises must not exceed 250,000 tonnes per annum.		Refer to Table 1 Condition A6	Compliant
L2.5	Incoming waste must only be transported to the Premises from pre-qualified customers as per Section 6.2.3 of the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623)).		Refer to Table 1 Condition A7	Compliant
L2.6	Incoming waste must comply with resource recovery criteria in specified in Table 1 of the EPA's Energy from Waste Policy Statement for each waste stream.		Refer to Table 1 Condition A7	Compliant
L2.7	Approval in writing must be sought from the EPA to receive "Mixed commercial and industrial waste" with "No limit by weight..." under Table 1 of the NSW EPA's "NSW Energy from Waste Policy Statement".	Energy from Waste Quarterly Report, June 2018 to August 2018 Energy from Waste Quarterly Report, September 2018 to November 2018	Cleanaway ResourceCo advised that no material has been received under this category. A review of the Energy from Waste Quarterly Reports for June 2018 to August 2018 and September 2018 to November 2018, confirmed that no waste was recorded under Commercial and industrial (no limit). Material potentially eligible for this category has been received at the facility under the category of Commercial and Industrial (50% Mixed).	Compliant
L3	Noise limits			
L3.1	Noise generated at the Premises must not exceed the noise limits in the Table below <ul style="list-style-type: none"> Any residential receiver not associated with the Premises LAeq(15 minute) 35dB(A) at any time 		Refer to Table 1 Condition B28	Compliant
L3.2	For the purpose of condition L3.1; <ul style="list-style-type: none"> 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. 		Refer to Table 1 Condition B24	Compliant

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sunday and Public Holidays. 			
L3.3	<p>The noise limits set out in condition L3.1 apply under all meteorological conditions except for the following:</p> <ul style="list-style-type: none"> 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 		<p>Refer to Table 1 Condition B28 and B29.</p> <p>No noise monitoring has been undertaken to determine compliance.</p>	Not triggered
L3.4	<p>For the purposes of condition L3.3:</p> <p>Data recorded by a meteorological station installed on the Premises must be used to determine:</p> <ul style="list-style-type: none"> 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. 		<p>Refer to Table 1 Condition B28 and B29.</p> <p>No noise monitoring has been undertaken to determine compliance.</p>	Not triggered
L3.5	<p>To determine compliance:</p> <p>(a) with the Leq(15 minute) noise limits in condition L3.1, the noise measurement equipment must be located:</p> <ul style="list-style-type: none"> 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. <p>(b) with the LA1(1 minute) noise limits in condition L3.1, the noise measurement equipment must be located within 1 metre of a dwelling façade.</p>		<p>Refer to Table 1 Condition B28 and B29.</p> <p>No noise monitoring has been undertaken to determine compliance.</p>	Not triggered

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<p>(c) with the noise limits in condition L6.1, the noise measurement equipment must be located:</p> <ul style="list-style-type: none"> 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). 			
	<p>L3.6 A non-compliance of condition L3.1 will still occur where noise generated from the Premises in excess of the appropriate limit is measured:</p> <ul style="list-style-type: none"> 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. 		<p>Refer to Table 1 Condition B28 and B29.</p> <p>No noise monitoring has been undertaken to determine compliance.</p>	Not triggered
	<p>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.</p>		<p>Refer to Table 1 Condition B28 and B29.</p> <p>No noise monitoring has been undertaken to determine compliance.</p>	Not triggered
L4	Hours of operation			
L4.1	<p>Construction works must only be undertaken:</p> <ul style="list-style-type: none"> between the hours of 7:00am and 6:00pm Monday to Friday; between the hours of 8:00am and 1:00pm on Saturdays; and at no time on Sundays or public holidays. 	Construction – beyond the scope of the audit		Not triggered
L4.2	Works outside of the hours identified in condition L4.1 may be undertaken in the following circumstances...	Construction – beyond the scope of the audit		Not triggered
L4.3	Activities on the Premises, are only permitted between the following hours.			
L5	Potentially offensive odour			
L5.1	<p>No condition of this licence identifies a potentially offensive odour for the purpose of Section 129 of the Protection of the Environment Operations Act 1997.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of</p>		<p>Refer to Table 1 Condition B36</p> <p><i>Refer to Improvement opportunity IO-07 in Section 4.2 of the report.</i></p>	Compliant

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	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.			
3	OPERATING CONDITIONS			
O1	Activities must be carried out in a competent manner			
O1.1	Licensed activities must be carried out in a competent manner. This includes: (a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Site inspection	All activities observed on site during the site inspection were observed to be undertaken in a competent manner.	Compliant
O2	Maintenance of plant and equipment			
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: (a) must be maintained in a proper and efficient condition; and (b) must be operated in a proper and efficient manner.		Refer to Table 1 Condition A23 Issues were identified by this audit that need to be addressed by ResourceCo, in order to comply with this condition related to: <ul style="list-style-type: none"> • PEF debris • stormwater system <p>Refer to Recommendation R-03 and R-05 in Section 4.1 of the report.</p>	Non-compliant
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.		Refer to Table 1, condition B32 Refer to Recommendation R-02 in Section 4.1 of the report.	Non-compliant
O3.2	The Premises must be maintained in a condition which prevents or minimises the emission of dust from the Premises.		The site has not received any complaints in relation dust. During the site inspection, there was no visible airborne dust evident outside of the process building however there has been no environmental monitoring for dust impacts from the operation	Compliant

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
O3.3	The licensee must ensure no visible dust leaves the Premises.		The site has not received any complaints in relation dust. During the site inspection, there was no visible airborne dust evident outside of the process building however there has been no environmental monitoring for dust impacts from the operation	Compliant
O3.4	The licensee must ensure that no material, including sediment or oil, is tracked from the Premises.		The premises has a functioning wheel wash at the exit to its premises. No sediment or oil tracking within the premises, or tracked from the premises, was observed at the time of the audit.	Compliant
O4	Emergency response			
O4.1	The licensee must prepare, maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. NOTE: The licensee must develop their PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations Act 1997 (the POEO Act) and the POEO Regulations.	<ul style="list-style-type: none"> PROC31 – Pollution Incident Response Management Plan, Version 1.1, 11/07/2018. Toolbox records of PIRMP Test, dated July 2018 	The site has established a Pollution Incident Response Management Plan. The plan is available on the Resource web site. The plan was tested in July 2018.	Compliant
O5	Processes and management			
O5.1	Soil erosion and sediment control measures for the construction stage must be designed in accordance with the document Managing Urban Stormwater — Soils & Construction Volume 1 (2004). Details are to be submitted to the satisfaction of the Certifying Authority prior to the construction stage.	Construction – Beyond the scope of the audit.		
O5.2	Prior to commencing operations, the licensee must prepare an operation stage Stormwater Management Plan (SMP) in consultation with the EPA. The SMP must: a) include a commissioning stage monitoring program to characterise stormwater discharges from the premises in terms of pollutant concentrations and loads and to demonstrate treatment performance; b) include a less intensive ongoing monitoring program to ensure treatment performance is maintained;	Water Management Plan, GHD, 9 March 2018, Version 3	The operational Stormwater Management Plan is incorporated into the Water Management Plan as Section 3-Surface Water Management Plan. The plan includes: <ul style="list-style-type: none"> Staged monitoring treatment performance benchmarks contingencies Also refer to Table 1 Condition B22.	Compliant

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<p>c) specify treatment performance benchmarks derived with reference to relevant ANZECC (2000) trigger values and detail methods for comparing monitoring results against these;</p> <p>d) identify contingencies (e.g. additional or alternative treatment measures) that will be implemented to improve treatment performance if the discharge does not achieve the treatment performance benchmarks.</p> <p>Note: With respect to O5.2 a), the commissioning stage monitoring program must be initiated after a 6 to 12 month lead in to allow operations to fully commence.</p>			
O6	Other operating conditions			
O6.1	Operations at the Premises must be undertaken in accordance with the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623).		Refer to Table A1- Condition C5 <i>Refer to relevant sub-plans for recommendations</i>	Non-compliant
O6.2	By no later than 5 October 2018, the Applicant must engage a suitably qualified person to undertake an audit of the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623). A report detailing the outcomes of the audit must be submitted to the EPA by no later than 7 December 2018.		An audit of the "ResourceCo RRF Pty Ltd Operational Environmental Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171623) has not been undertaken. <i>Refer to Recommendation R-010 in Section 4.1 of the report.</i>	Non-compliant
O6.3	Operations at the Premises must be undertaken in accordance with the "ResourceCo RRF Pty Ltd Energy from Waste Management Plan Wetherill Park RRF" dated March 2018 (EPA ref DOC18/171577).		Refer to Table A1-Condition B9	Compliant
4	MONITORING AND RECORDING CONDITIONS			
M1	Monitoring records			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.		Environmental monitoring required by this licence includes meteorological data (Condition L3.4) and monitoring is required by the site's water management plan, which form part of the OEMP. No environmental monitoring is required by this licence however monitoring is required by the site's water management plan, which form part of the OEMP.	See below.

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
			Compliance with the OEMP is a requirement of this licence hence surface water monitoring in accordance with the WMP must be maintained in accordance with Condition M1 of this licence.	
M1.2	<p>All records required to be kept by this licence must be:</p> <ul style="list-style-type: none"> (a) in a legible form, or in a form that can readily be reduced to a legible form; (b) kept for at least 4 years after the monitoring or event to which they relate took place; and (c) produced in a legible form to any authorised officer of the EPA who asks to see them. 	<p>Water quality samples records for:</p> <ul style="list-style-type: none"> • 03/09/18 • 4/10/18 • 10/10/18 • 19/06/18 • 26/09/18 • 28/11/18 <p>SAL laboratory reports and chain of custody documentation</p>	<p>Surface water monitoring data is recorded on an excel spread sheet and available on-site including SAL laboratory reports and chain of custody documentation. Records since inception have been retained.</p>	Compliant
M1.3	<p>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</p> <ul style="list-style-type: none"> (a) the date(s) on which the sample was taken; (b) the time(s) at which the sample was collected; (c) the point at which the sample was taken; and (d) the name of the person who collected the sample. 	<p>Water quality samples records</p> <p>SAL laboratory reports and chain of custody documentation</p>	<p>Samples are not collected for Meteorological data hence this condition does not apply.</p> <p>Water monitoring samples collected by ResourceCo are recorded on an excel spreadsheet and supported by the laboratory reports and chain of custody documentation. Records required by this condition were maintained except for "the time(s) at which the sample were collected".</p> <p>Refer to Recommendation R-04 in Section 4.1 of the report.</p> <p>Refer to Improvement opportunity IO-06 in Section 4.2 of the report.</p>	Non-compliant
M2	Recording of pollution complaints			
M2.1	<p>The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.</p>		<p>No complaints have been made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.</p>	Not triggered

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
M2.2	<p>The record must include details of the following:</p> <ul style="list-style-type: none"> (a) the date and time of the complaint; (b) the method by which the complaint was made; (c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (d) the nature of the complaint; (e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and (f) if no action was taken by the licensee, the reasons why no action was taken. 		Refer to Table A2, Condition M2.1	Not triggered
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.		Refer to Table A2, Condition M2.1	Not triggered
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.		Refer to Table A2, Condition M2.1	Not triggered
M3	Telephone complaints line			
M3.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.		Refer to Table A2, Condition M2.1	Not triggered
M3.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.		Refer to Table A2, Condition M2.1	Not triggered
M3.3	The preceding two conditions do not apply until after the date of the issue of this licence.		Refer to Table A2, Condition M2.1	Not triggered
5	REPORTING CONDITIONS			
R1	Annual return documents			

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ul style="list-style-type: none"> (a) a Statement of Compliance, (b) a Monitoring and Complaints Summary, (c) a Statement of Compliance - Licence Conditions, (d) a Statement of Compliance - Load based Fee, (e) a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, (f) a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and (g) a Statement of Compliance - Environmental Management Systems and Practices. 		<p>The facility commenced operation in June 2018, the first annual return has not been triggered.</p>	<p>Not triggered</p>
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p>			<p>Not triggered</p>
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ul style="list-style-type: none"> (a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and (b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>			<p>Not triggered</p>
R1.4	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p>			<p>Not triggered</p>

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or (b) in relation to the revocation of the licence - the date from which notice revoking the licence operates. 			
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').			Not triggered
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.			Not triggered
R1.7	<p>Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:</p> <ul style="list-style-type: none"> (a) the licence holder; or (b) by a person approved in writing by the EPA to sign on behalf of the licence holder. 			Not triggered
R2	Notification of environmental harm			
R2.1	<p>Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>			Not triggered
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.			Not triggered
R3	Written report			
R3.1	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <ul style="list-style-type: none"> (a) where this licence applies to premises, an event has occurred at the premises; or (b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised 	EPA letter to OptimE, Doc19/66293, 29/01/2019	<p>ResourceCo advised that the EPA has not requested a written report from the premises regarding an event that has caused, is causing or is likely to cause material harm to the environment.</p> <p>In response to an invitation from this audit process, to comment, the EPA stated that "The Licence was issued</p>	Not triggered.

Approval (ID)	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<p>by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.</p>		<p>by the EPA on 9 May 2017. Since that time, the EPA has conducted three inspections of the Premises. To date, the EPA has not taken any regulatory action in relation to the Licence or scheduled activities at the Premises.”</p> <p>It is noted that since the EPA letter dated 29 January 2019, the EPA has issued to ResourceCo an invitation to show cause letter (dated 1 February 2019) to ResourceCo related to a potential breach of Condition L2.3 of the EPL. ResourceCo responded to the EP letter on 4 February 2019. This matter is discussed in further detail in Section 3.3 of the report.</p>	

Section R3.2 – E2.3 are beyond the scope of this audit and not included in this table.

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

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN				
5.1	<p>Inductions</p> <ul style="list-style-type: none"> All staff and sub-contractors are to be required to attend induction training and pass a competency test prior to commencing work. The induction covers health, safety and environmental requirements. A record of training attendance and induction will be kept on file. 	<p>Environmental training package</p> <p>Incident reporting and investigation training (002)</p> <p>Incident reporting form</p> <p>Training matrix – WP RRF (002)</p> <p>Toolbox attendance records for 20/6/18.</p> <p>Toolboxes:</p> <ul style="list-style-type: none"> Env incidents 21/11/18 Env. complaints 21/5/18 for personnel at reception and weigh bridge. 	<p>EMS awareness is provided to all personnel and staff members. Conducted by the ResourceCo EHS officer. The training package addressed the key requirements.</p> <p>A training matrix for the facility indicates that refresher training is scheduled on a 2-yearly basis.</p> <hr/> <p>Approximately 50% of employees is labour hire so the EMS awareness package is delivered depending on the schedule of work on site.</p> <p>Refer to Recommendation R-11 in Section 4.1 of the report.</p>	<p>Compliant</p> <hr/> <p>Non-compliant</p>
5.2	<p>Tool box sessions</p> <ul style="list-style-type: none"> Toolbox meetings are to be held on a regular basis and cover health, safety and environmental topics. 	<p>Toolboxes:</p> <ul style="list-style-type: none"> Env incidents 21/11/18 Env. complaints 21/5/18 for personnel at reception and weigh bridge. 	<p>Toolbox records undertaken by EHS Officer were sighted</p>	<p>Compliant</p>
5.3	<p>Environmental awareness</p> <ul style="list-style-type: none"> Environmental awareness training is aimed at increasing environmental awareness and promoting familiarity with environmental issues and aspects. 	<p>Environmental training package</p>	<p>Environmental awareness records undertaken by EHS Officer were sighted</p>	<p>Compliant</p>
5.4	<p>Emergency response</p> <ul style="list-style-type: none"> Staff will be trained in environmental controls as part of the emergency response training. 	<p>PIRMP toolbox records. Meeting minutes 11/7/18</p>	<p>The Pollution Incident Response Management Plan (PIRMP) was tested on 11 July 2018.</p>	<p>Compliant</p>

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
6.1.1	Operating hours		Refer to Table A1, Condition B24	Compliant
6.2.1	Permitted wastes		Refer to Table A1, Condition B1	Compliant
6.2.2	Excluded wastes		Refer to Table A1, Condition B1	Compliant
6.2.3	Waste screening and acceptance <ul style="list-style-type: none"> • Prequalification • At facility <ul style="list-style-type: none"> ○ the Customer Service and Weighbridge Operator will check with the driver if the waste meets the acceptance criteria ○ Once the load is tipped the Waste Reveal Inspection Officer will inspect the load for waste types not accepted 	Incoming waste pre-qualification form (Form 49 Version 3.0, 21/07/2018). Customer prequalification list. Monthly reports to the EPA (see Condition A6) Services Rendered reports for August 2018 and December 2018.	Refer to Table A1, Condition A7	Compliant
6.2.4	Waste monitoring <ul style="list-style-type: none"> • The following details will be recorded and kept on file for all incoming waste received on the site: <ul style="list-style-type: none"> ○ Quantity, type and source of waste ○ Date and time of receipt ○ PEF processing criteria category ○ Copies of all documentation relating to tracking for controlled waste brought to the site ○ Details of any hazardous or other prohibited materials (including asbestos) brought to the site • The following details will be recorded and kept on file for all material produced on site and disposed off site: <ul style="list-style-type: none"> ○ Quantity, type, quality and destination of outputs/products ○ Quantity, type and destination of all waste/residuals sent for offsite disposal 	<i>Energy from Waste Management Plan</i> , GHD, 27 February 2018, Version 6 Services Rendered reports for August 2018 and December 2018.	Refer to Table A1, Condition A7, B6, B7	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> ○ Copies of all documentation relating to tracking for all controlled waste leaving the site • Training of receival staff to identify hazardous wastes 			
6.4	<p>Waste delivery</p> <p>Weighbridge - the following information will be recorded:</p> <ul style="list-style-type: none"> • Vehicle registration • Customer name and address • On accessing the site, Gross Weight, on egressing the site Tare Weight, ascertaining the Net Weight • Categorisation of the waste materials (either C&D recycling residues, C&I "no limit PEF", C&I "50% PEF" or mixed C&D) 	Services Rendered reports for August 2018 and December 2018.	<p>Refer to Table A1, Condition A7, B6, B7</p> <p>For categorisation of the waste materials (either C&D recycling residues, C&I "no limit PEF", C&I "50% PEF" or mixed C&D), refer to EfWMP, Section 4 below.</p>	Compliant
6.5	<p>Waste storage and processing</p> <ul style="list-style-type: none"> • All processed and unprocessed waste will be stored within the building on the site. • Waste will be secured and maintained within designated waste storage areas at all times and is not to leave the site onto neighbouring public or private properties. • Processed, wrapped and baled PEF may be stored in the area designated on the approved plans for the outdoor storage of PEF, as described in Section 6.6. 	Site inspection	<p>All processed and unprocessed waste was stored within the building on the site except for PEF bales. Storage of PEF bales exceeded the capacity of the designated area.</p> <p>Refer to Section 3.3 of the report.</p>	Non-compliant
6.6	<p>Finished PEF storage and despatch</p> <p>Finished PEF will be stored in the finished PEF storage area. This area is able to store approximately 1,800 tonnes and will be operated within the following parameters:</p> <ul style="list-style-type: none"> • 10% of capacity to be designated quarantine area for out of specification PEF diversion temporary storage • Minimise PEF to be stored on site at any one time (target = less than 1 day's production) to maximise the buffer storage space available in the event of a despatch issue. <p>Should dispatch to suppliers be interrupted:</p>		<p>All processed and unprocessed waste was stored within the building on the site except for PEF bales. Storage exceeded the capacity of the designated area.</p> <p>The process for managing PEF bales in excess of those stored in the designated area was not followed.</p> <p>The facility continued to manufacture PEF and receive waste when the PEF storage area was full.</p> <p>Refer to Section 3.3 of the report.</p>	Non-compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ol style="list-style-type: none"> 1. Maximise the storage of PEF in the PEF storage area (this includes both the loose PEF stored with the PEF storage area of the building as well as the baled and wrapped PEF storage area of the site) 2. Once the PEF storage area is full, cease manufacturing PEF until the undercover waste infeed area (which has a capacity of approximately 2,000 tonnes) is full 3. Once both these areas are full, cease receiving waste at the facility. The waste type (general solid waste (non-putrescible)) is able to be disposed of at one of a number of landfills in western Sydney. 			
6.12	<p>Fire prevention</p> <ul style="list-style-type: none"> • Onsite fire water tank and pumping equipment for fire-fighting • Fire protection system (deluge) in the building • Specific fire protection systems for major equipment • Installation of portable fire extinguishers in suitable locations across the site • Ban on smoking on site • All fuels or flammable liquids for operational use will be stored in appropriately banded, ventilated and secure stores • Hot works permits will be used where appropriate. • 24-hour site coverage by fire trained people (either staff or security personnel when the site is not staffed) 	<p>Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.</p> <p>Site safety rules</p> <p>Hot work permits (Template)</p> <p>Fire attack training records</p>	<p>Certifying authority confirmed compliance with FRNSW recommendations.</p> <p>Resource Co EHS officer confirmed:</p> <ul style="list-style-type: none"> • Ban on smoking on site as evidenced by the site safety rules • Hot works permits can only be authorised by the General Manager, Maintenance Manager or EHS officer. • 24-hour site coverage by fire trained people (either staff or security personnel when the site is not staffed) 	Complaint
6.13	<p>Vehicle wheel washing</p> <p>ResourceCo will ensure that all trucks leaving the site will depart via a wheel wash facility</p>	Site observation	Refer to Table A1, Condition B38	Compliant
9.1	<p>Energy from waste management</p> <ul style="list-style-type: none"> • Pre-qualify customers in accordance with the Incoming Waste Customer Pre-Qualification Procedure 	<p><i>Energy from Waste Management Plan</i>, GHD, 27 February 2018, Version 6</p>	Refer to Table A1, Condition A7, B6, B7	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> Demonstrate compliance with Energy from Waste Policy Statement Resource Recovery Criteria in accordance with the Energy from Waste Management Plan 	Services Rendered reports for August 2018 and December 2018.		
9.2	<p>Erosion and sediment control</p> <ul style="list-style-type: none"> The site will be fully sealed. Install and maintain erosion and sediment controls as per the Water Management Plan 	Site observation	The site is fully sealed	Compliant
9.3	<p>Stormwater management</p> <ul style="list-style-type: none"> Install and maintain water management structures to contain and treat all rainfall and runoff as per the Water Management Plan (Appendix M). Minimise the area of disturbance Install a tank farm to store stormwater collected on the site for re-use in dust mitigation 	Triaxial consulting, Stormwater Drainage Installation Certificate, dated 27/04/2018. Site observations	Refer to Table A1, Condition B16	Compliant
9.4	<p>Leachate management</p> <ul style="list-style-type: none"> Operate in accordance with the Leachate Management Plan (Appendix N) Ensure all waste is received and delivered inside the building. No waste will be stored outside. Ensure dry sumps within the building are emptied and leachates removed from the site to an appropriately licenced disposal facility 	Triaxial consulting, Stormwater Drainage Installation Certificate, dated 27/04/2018. Site observations	Refer to Table A1, Condition B16	Compliant
9.5	<p>Noise management</p> <p>The approach to the management of noise on site will be to:</p> <ul style="list-style-type: none"> 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 	Site observations	Refer to Table A1, Condition B29 Refer to Recommendation R-01 in Section 4.1 of the report.	Non-compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> • 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 • Assess noise emissions and implement actions to ensure compliance with the relevant conditions of the Development Consent. • Maintenance of machinery, plant and equipment – as required • Recording of noise complaints – on occurrence • Noise monitoring: <ul style="list-style-type: none"> ○ 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 			
9.6	<p>Air quality management</p> <ul style="list-style-type: none"> • Minimise the areas of disturbance • Maintain dust suppression and extraction equipment at major dust generation points in the process • Maintain the dust suppression sprays at key process locations, including conveyors of the processing plant and stockpile sprinklers • Keep manufacturing building roller doors closed, except when access or egress from the building is required. • Use industrial sweeper to clean roadways and operational areas on a regular basis 	<p>Site observations</p> <p>PROC 42 - Driver Code of Conduct, Version 1.0, 30/11/2017</p>	<p>Refer to Table A1, Condition B35</p> <p><i>Refer to Recommendation R-02 in Section 4.1 of the report.</i></p>	<p>Non-compliant</p>

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> Enforce a 20 km/h speed limit on internal roads to minimise dust generation Ensure all loaded vehicles entering and leaving the site are covered Undertake regular maintenance of mobile and fixed equipment to minimise exhaust emissions 			
9.7	Waste management <ul style="list-style-type: none"> Provide separate receptacles for recyclables Dispose of non-recyclable waste at an appropriately licenced landfill Encourage staff to adopt waste-reducing practices 	Site observations	Office waste were managed to encourage staff to minimise waste: <ul style="list-style-type: none"> separate receptacles for recyclables were observed 	Compliant
9.8	Traffic and access management <ul style="list-style-type: none"> Provide all new truck drivers with 'Site Induction for Drivers' form at the site entrance Provide drivers with the Site Traffic Management Policy Ensure all loads are fully covered prior to leaving the site Enforce a 20 km/h speed limit on internal roadways Ensure all vehicles enter and leave the site in a forward direction 	Site observations PROC 42 - Driver Code of Conduct, Version 1.0, 30/11/2017	Refer to OEMP Section 9.6 above	Compliant
9.10	Hazard management <ul style="list-style-type: none"> Ensure all staff are inducted and receive ongoing training via toolbox talks regarding their responsibilities relating to handling, storage and disposal of dangerous goods, hazardous chemicals and spill training Ensure all hazardous chemicals are stored in accordance with AS 1940 guidelines – including covering, bunding, barriers, signage, etc where appropriate Maintain Safety Data Sheets (SDS) for each hazardous chemical that is kept on site at the storage facilities Provide spill kits in strategic locations across the site 	SOP223 Refuelling mobile plant Fire attack training records Site observations	The site inspection confirmed that: <ul style="list-style-type: none"> Diesel fuel tank was stored in accordance with AS1940 but other small packaged stores were not stored in accordance with AS3833:2007 (refer Table A1, Condition B42) Not all personnel on site receive environmental training before commencing work (refer Table A3 Section 5.1) Spill kits were observed on site Spill training drill record sighted Fire attack training records sighted 	Non-Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> Ensure any spills are cleaned up immediately using spill kits and disposing of contaminated material at an appropriately licenced waste facility Ensure staff are trained in spill clean-up procedures and use of the spill kits at the site Installation of portable fire extinguishers in suitable locations across the site Ensure staff are trained in the use of first attack fire fighting Develop and implement a procedure for the refuelling of mobile plant 		<ul style="list-style-type: none"> Fire extinguishers sighted SOP223 Refuelling mobile plant sighted <p>Refer to Recommendation R-07 in Section 4.1 of the report.</p>	
9.11	<p>Landscape management</p> <ul style="list-style-type: none"> Install and maintain the landscaping of the site in accordance with the Landscape Management Plan (Appendix O) Maintain the site in a tidy manner and ensure the site is regularly cleaned and maintained Undertake weed management in accordance with the Landscape Management Plan (Appendix O) 	<p>Landscape Management Plan, GHD, 22 February 2018, Version 1</p> <p>Client Services Agreement with Pickwick Security Services and Integrated site services scope</p> <p>Site inspection</p>	<p>Refer to Table A1 Condition B45.</p> <p>Refer to Recommendation R-08 in Section 4.1 of the report.</p>	Non-compliant
9.12	<p>Litter control</p> <ul style="list-style-type: none"> Ensure waste delivery occurs within the receival hall Operate a wheel wash facility to remove mud and any potential litter from trucks leaving the site Provide litter bins for staff on site Include in environmental awareness training for staff Include litter observations in regular site inspections 	Site observations	<ul style="list-style-type: none"> waste delivery occurs within the receival hall wheel wash facility operational litter bins for staff provided litter observations were undertaken in regular site inspections however the response to litter controls has not been adequate. Considerable litter was evident across the site from the PEF baler and PEF storage. <p>Refer to Recommendation R-05 in Section 4.1 of the report.</p>	Non-compliant
9.13	<p>Pests, vermin and noxious weed management</p> <ul style="list-style-type: none"> Implement measures to manage pests, vermin and declared noxious weeds on the site Inspect the site on a regular basis to ensure that these measures are working effectively and that pests, vermin or 	<p>Bug Stop Industrial Extermination Report # 108827 dated 11/12/18.</p> <p>Client Services Agreement with Pickwick Security Services and Integrated site services scope</p>	Refer to Table A1, Condition B12 and B29	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<p>noxious weeds are not present in sufficient numbers to post an environmental hazard, or cause the loss of amenity in the surrounding area.</p> <p>Management measures include:</p> <ul style="list-style-type: none"> • Tipping of all waste is to occur within the receival hall • Regular inspections for pests/vermin/weed on the site • Treatment of any infestations detected in incoming waste or within the facility immediately • Engagement of a registered pest exterminator/controller for any treatment of detected infestations 	Site inspection		
AIR QUALITY MANAGEMENT PLAN				
4	<p>Management measures and control</p> <ul style="list-style-type: none"> • An industrial sweeper will be used to clean roadways and operational areas on a regular basis • A 20 km/h speed limit will be enforced on internal roads to minimise dust generation • All loaded vehicles entering and leaving the site will be required to be covered • The main building will be fitted with dust suppression sprays at key locations, including conveyors of the processing plant and stockpile sprinklers • Rapid roller doors will be installed in all locations where regular access is required • Conventional doors will be installed in other locations which will remain closed during normal operations except for access and egress • Engines of trucks and mobile plant will be switched off when not in use • Maintenance and servicing of plant will be carried out in accordance with manufacturer's specifications 	<p>Site observations</p> <p>PROC 42 - Driver Code of Conduct, Version 1.0, 30/11/2017</p>	<p>Refer to Table A1, Condition B35</p> <p>Refer to Recommendation R-02 in Section 4.1 of the report.</p>	<p>Non-compliant</p>

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> Drop heights will be reduced during loading and unloading of material Dust suppression and extraction equipment will be installed at major dust generation points in the process. Incoming loads containing odorous materials will be identified immediately and rejected from the site Procedures for staff to report the presence of odours 			
5	<p>Monitoring</p> <ul style="list-style-type: none"> Record any dust/odour complaints in the Complaints Register – on occurrence Investigate and respond to any dust odour complaints in accordance with the Section 9.9 of the OEMP: Complaints handling, investigation and rectification and Section 5.2.3 below – on occurrence Dust observations at the property boundary – weekly as part of regular inspections Check Complaints Register for dust/odour issues – monthly 	Site interviews	No complaints have been recorded.	Compliant
WATER MANAGEMENT PLAN				
2.2.2	<p>Stormwater pollution controls include a series of treatment devices:</p> <ul style="list-style-type: none"> HumeGard HG18 GPT Humes JellyFish JF3000-19-4 Filter Ecosol RSF100 litter baskets 	<p>Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.</p> <p>Triaxial consulting, Stormwater Drainage Installation Certificate, dated 27/04/2018.</p> <p>Site observations (drain wardens only)</p>	<p>Refer to Table A1, Condition B35</p> <p>Ecosol RSF 100 litter baskets have been replaced with “Drain wardens” an in-pit equivalent.</p>	Complaint
2.3.1	<p>Fire water containment</p> <p>In the instance of a fire event, the facility design will cater for the containment of contaminated fire services water on site. Contaminated fire services water is to be removed from the site by vacuum truck.</p>	Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.	Refer to Table A1, Condition A15	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
2.3.2	<p>Leachate management</p> <p>The waste materials received into the site will be dry in nature and will all be stored under cover in the manufacturing building. There will be no waste materials stored outside. In the rare instance that materials received into the manufacturing process release leachates, for example if a non-conforming load of wet waste is delivered, the design of the receiving slab levels caters for an effectively bunded area that grades to dry sumps within the receiving area.</p> <p>The dry sumps will be emptied via vacuum trucks and any leachates removed from the site to an appropriately licensed disposal facility.</p>	Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.	Refer to Table A1, Condition A15	Compliant
3.4	<p>Surface water monitoring</p> <p>The monitoring locations for the site are proposed based on the site surface water management, as summarised above and to characterise the majority of runoff. These site water quality sampling locations are listed below and are shown on drawing TX-11972.00 – C2.2 Issue C, provided as Appendix A.</p> <ul style="list-style-type: none"> Upstream – within drainage easement at point the entry point to the 900 mm diameter culvert, adjacent to the NW corner boundary of the site. (sampled approximately 65 m upstream of the location where site runoff enters the easement pipe). Site discharge – within junction box ahead of JB1 to sample all runoff discharged from the site at this location 	Site inspection		Compliant
3.4.1	<p>Pre-commissioning stage</p> <ul style="list-style-type: none"> Monitoring for the pre-commissioning stage will be following construction and be conducted for a duration of up to 12 months, prior to the commissioning stage Upstream monitoring only, When Site Sampling Trigger is activated at Upstream location with a maximum of one sampling event per month 	<p>Water quality samples records for:</p> <ul style="list-style-type: none"> 03/09/18 4/10/18 10/10/18 19/06/18 26/09/18 28/11/18 	Refer to Table A1, Condition B23	Compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
Commissioning Stage				
	<ul style="list-style-type: none"> • Commissioning Stage will continue until 12 months following construction (that is, the combined duration of the pre-commissioning and commissioning stage will be 12 months) at which point the ongoing operations stage begins. • Upstream and site discharge monitoring, Site Sampling Trigger is activated at Upstream location with a maximum of one sampling event per month • Ongoing operations stage • Upstream and site discharge monitoring, Site Sampling Trigger is activated at Upstream location with a maximum of one sampling event very six months • Spill • Upstream and site discharge monitoring, on each occasion of the Spill Monitoring Sampling Trigger being activated 	SAL laboratory reports and chain of custody documentation		
4.1	Environmental management records generated will be identified, collected and stored in accordance with ResourceCo's quality management system.	Water quality samples records. SAL laboratory reports and chain of custody documentation Records on ResourceCo N:Drive	Water quality records were maintained by the ResourceCo EHS officer on a spreadsheet. The records were maintained on the company's N: Drive in accordance with the ResourceCo quality system.	Compliant
LEACHATE MANAGEMENT PLAN				
3	Management protocol for leachate and fire water <ul style="list-style-type: none"> • Fire water containment – <ul style="list-style-type: none"> ○ Within building, sufficient detention has been provided 90 minutes of fire sprinklers active time ○ Fire outside the main building, the shut off valve will be activated automatically or manually of required. • Leachate management <ul style="list-style-type: none"> ○ No leachate to be generated with waste type. 		Fire water and leachate protocols have not been invoked.	Not triggered

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> ○ Any leachate that may generate with be contained within dry sumps within the building. ○ Any leachate spill that occurs outside the manufacturing building, the shut off valve will be activated manually. 			
4.2	Monitoring Refer to the Water Management Plan			Not triggered
LANDSCAPE MANAGEMENT PLAN				
5	Proposed landscaping Detailed landscape plans are provided in Appendix A. These also provide information on the species to be planted on-site in the Plant Schedule on Drawing 0215-0954 LD 200.		Plantings were generally in accordance with the plan.	Compliant
6	Monitoring, maintenance measures and evaluation <ul style="list-style-type: none"> • Seasonal landscape watering and maintenance • 6 monthly checks of landscaping areas to assess degree of weed infestation, health of planted trees, shrubs and grasses and the presence of appropriate erosion and sedimentation controls • Yearly weed control 	Client Services Agreement with Pickwick Security Services and Integrated site services scope Site inspection	The site inspection confirmed that the landscaped areas of the site were well maintained and free of weeds and litter.	Compliant
ENERGY FROM WASTE MANAGEMENT PLAN				
4	Calculation of percentages Formula: <i>PEF % ≤ (100% x C&D recycling residuals) + (100% x “no limit mixed C&I” waste) + (50% x “50% mixed C&I” waste) + (25% x mixed C&D waste)</i> The frequency of calculation will be 3 monthly (quarterly).	Energy from Waste Quarterly Report, 1 September 2018 to 30 November 2018 Email from EPA to Cleanaway Resource Co dated 4 March 2019	Quarterly reports are produced in accordance with the plan. Two were produced between June and December 2018. The formula for the EfW Quarterly report for September/November was not consistent with the formula in the EfWMP approved by DPE. For the EfW Quarterly Report, 1 September 2018 to 30 November 2018, the applied formula was: <i>PEF % ≤ (100% x C&D recycling residuals) + (100% x C&I recycling residuals) + (100% x “no limit mixed C&I” waste) + (50% x “50% mixed C&I” waste) + (25% x mixed C&D waste)</i>	Non-compliant

Section	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
			<p>It is noted however that the PEF calculation formula was amended in consultation with the EPA. Correspondence sighted confirmed that the EPA has accepted the Energy from Waste Quarterly Report, 1 September 2018 to 30 November 2018 with the revised calculation method.</p> <p><i>Refer to Recommendation R-14 in Section 4.1 of the report.</i></p>	
5.2	PEF calculations and records generated will be identified, collected and stored in accordance with ResourceCo's quality management system.	Reports saved on ResourceCo N: Drive	Records were maintained on the company's N: Drive in accordance with the ResourceCo quality system.	Compliant

Appendix A: Table A4 - SSD 7256 Statement of Commitments – Compliance Table

Aspect	Commitment	Evidence Collected	Audit findings and recommendations	Compliance Status
O - Objectives	ResourceCo is committed to the following:	<i>Operational Environmental Management Plan</i> , GHD, 14 March 2018, Version 5	Addressed in the scope of the OEMP.	Compliant
	<ul style="list-style-type: none"> 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. 			
	<ul style="list-style-type: none"> 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. 		Occupational health and safety policy attached to the OEMP.	
	<ul style="list-style-type: none"> To ensure site operations do not significantly impact on potential environmental receptors and comply with the following environmental legislation. 		Addressed by each aspect of the OEMP.	
	<ul style="list-style-type: none"> 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. 		No commitment to ensuring new technologies are implement throughout the life of the plant. OEMP has have a commitment to continual improvement. <i>Refer to Improvement Opportunity IO-06 in Section 4.2 of the report.</i>	
	<ul style="list-style-type: none"> To encourage and facilitate community participation in the recycling of building and construction waste. 		Community participation limited to managing community complaints. <i>Refer to Improvement Opportunity IO-06 in Section 4.2 of the report.</i>	
	<ul style="list-style-type: none"> To protect the surrounding environment through the implementation and management of environmental controls and contingency measures. 		Addressed by each aspect of the OEMP.	
G - General	1. The development will be undertaken in accordance with the EIS prepared by Nexus Environmental Planning Pty Ltd, including accompanying appendices as amended in the RTS.		Refer to Table A5: EIS commitments Table	Compliant
	2. The development will be undertaken in accordance with the following drawings:	As-built drawings Triaxial consulting,	Development was in accordance with Appendix A1 of the Approval.	

Aspect	Commitment	Evidence Collected	Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> Drawings prepared by Bell Architects as contained in Appendix 7 of the EIS as amended by plans contained in Attachment 14 to the RTS. Drawings prepared by Mott MacDonald as contained in Appendix 17 of the EIS as amended in by plans prepared Triaxial Consulting and contained in Attachment 15 to the RTS. Drawings prepared by Tract Landscape Architects as contained in Appendix 12 of the EIS, as amended by plans contained in Attachment 15 to the RTS. Cut and fill plans prepared by Triaxial Consulting as contained in Attachment 18 to the RTS. 	<p>Pavement plan TX-11972.00-C4.0, C4.1 and C4.3</p> <p>Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.</p>		
	<p>3. ResourceCo will develop a monitoring program to inform the NSW Department of Planning and Environment, EPA and Fairfield City Council of construction staging and operation of the Waste and Resource Management Facility throughout the development process.</p>	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p>	<p>Only operational phase assessed.</p> <p>Monitoring program have been documented in the OEMP and associated sub-plans</p>	
	<p>4. ResourceCo will obtain the necessary approvals and permits to undertake both construction and operation of the Waste and Resource Management Facility.</p>	<p><i>EPA Environmental Protection Licence (EPL) No. 20937</i>, 14 May 2018</p>	<p>Environment Protection Licence has been obtained with the EPA.</p>	
	<p>5. A copy of the approved and certified plans, specifications and documents, including conditions of approval will be kept on the site at all times.</p>	<p>As-built drawings Triaxial consulting, Pavement plan TX-11972.00-C4.0, C4.1 and C4.3</p> <p>Steve Watson and Partners, Final Occupation Certificate 16/1688/02, dated 11 June 2018.</p>	<p>Certified plans and CoA are available on site.</p>	
	<p>6. All building works will be carried out in accordance with the Building Code of Australia</p>	<p>Steve Watson and Partners, Final Occupation Certificate</p>	<p>Final Occupation Certificate 16/1688/02– Steve Watson and Partners certifies that:</p>	

Aspect	Commitment	Evidence Collected	Audit findings and recommendations	Compliance Status
		16/1688/02, dated 11 June 2018.	<ul style="list-style-type: none"> • They have been appointed as the Principal Certifying Authority under section 109E. • The have taken into consideration the health and safety of the occupants of the building. • A Development Consent or Complying Development Certificate is in force with respect to the building. • A Construction Certificate has been issued with respect to the plans and specifications for the building. • The building is suitable for occupation or use in accordance with its classification under the Building Code of Australia. • Where required, a Final Fire Safety Certificate has been issued for the building or an Interim Fire Safety Certificate has been issued for the relevant part of the building. • Where required, a report from the Commissioner of Fire Brigades has been considered 	
EMP - Environmental Management Plan	<p>An Environmental Management Plan (EMP) will be developed for both the construction and operation stages of the Waste and Resource Management Facility.</p> <p>The key principles of the EMP will be to provide:</p> <ul style="list-style-type: none"> (a) An environmental management tool for the construction and operation of the proposed Waste and Resource Management Facility. (b) A means of identifying baselines for monitoring the impact of the Waste and Resource Management Facility. (c) An outline of reporting requirements associated with the Waste and Resource Management Facility. (d) The processes for interaction between ResourceCo and the relevant government authorities. (e) The means by which compliance with the Secretary's requirements and the requirements of the Environmental Protection Licence will be achieved. 	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p><i>Energy from Waste Management Plan</i>, GHD, 27 February 2018, Version 6</p> <p><i>Water Management Plan</i>, GHD, 9 March 2018, Version 3</p> <p><i>Leachate Management Plan</i>, GHD, 12 March 2018, Version 3</p> <p><i>Air Quality Management Plan</i>, GHD, 22 February 2018, Version 1</p>	<p>The stated key principles are document in the OEMP in Section 1.2.</p> <p>Point 1: The OEMP overall</p> <p>Point 2: Section 11 of the OEMP and associated sub-plans outlines the relevant monitoring for each environmental aspect of the plant's operation.</p> <p>Point 3: Section 11 (Table 9) of the OEMP outlines the relevant reporting requirements for the plant's operation.</p> <p>Point 4: Consultation between ResourceCo and agencies for the preparation of the OEMP and associated sub-plans is outlined in Section 1.5.2. Section 7.1.3 identifies a notification process for incidents. Also, the section requires updating.</p> <p>Point 5: Compliance with the Conditions of approval and EPL are integrated within the OEMP sub-plans, procedures and safe operation procedures.</p>	Compliant

Aspect	Commitment	Evidence Collected	Audit findings and recommendations	Compliance Status
		<p><i>Landscape Management Plan, GHD, 22 February 2018, Version 1</i></p>		
I&T - Induction and training	<ol style="list-style-type: none"> 1. Environmental induction for all employees and contractors will take place before starting work. Induction to cover the following issues; <ol style="list-style-type: none"> i. requirements of the EMP; ii. specific environmental issues on the site and control measures; iii. roles and responsibilities for environmental management, and iv. environmental incident procedures. 2. Retraining sessions will be undertaken within one month of changes to relevant sections of the EMP. 3. Retraining sessions will be undertaken within one month to persons identified by Complaints Register as not conforming to procedures. 		<p>Refer to Appendix A, Table A3 Section 5.1</p> <p>Refer to Recommendation R-11 in Section 4.1 of the report.</p>	Non-compliant
	<ol style="list-style-type: none"> 4. All truck drivers entering the site for the first time will be provided with the Site Induction for Drivers form. 		<p>Driver induction is provided to truck drivers however Form 61 - Truck Driver induction, Version 1, 04/10/17 does not cover environmental matters.</p> <p>Refer to Improvement Opportunity IO-05 in Section 4.2 of the report.</p>	
SE - Site earthworks	<p>All earthworks required will be undertaken in accordance with plans prepared by Triaxial Consulting as contained in Attachment 18 to the RTS.</p>		<p>Construction - Beyond the scope of this audit</p>	
ESC - Erosion and sediment control	<ol style="list-style-type: none"> 1. Construct all erosion and sedimentation controls as per Appendix 19 of the EIS as amended by plans prepared by Triaxial Consulting contained as Attachment 15 to the RTS. 2. Divert runoff to sediment basins, sediment traps and catch ponds as a primary means of sediment trapping before water is discharged to main tank storage. 3. Inspect drainage and sediment controls monthly and conduct maintenance as required to ensure effectiveness. Where 		<p>Construction - Beyond the scope of this audit</p>	

Aspect	Commitment	Evidence Collected	Audit findings and recommendations	Compliance Status
	<p>erosion is observed to be occurring, implement rehabilitation/stabilisation measures</p> <p>4. Implement and maintain silt fence. Fence to be maintained along boundary.</p>			
AQ - Air quality and odour	Implement all measures for air quality control contained in Appendix 14 of the EIS as amended by measures contained in Attachment 12 to the RTS as follows...			
AQ Dust	<p>Construction Dust Management</p> <hr/> <p>Operational Dust Management</p> <p>The main building will be fitted with dust suppression sprinklers and automatic roller doors. In addition, the following dust management measures will be implemented during the operation of the development:</p> <ul style="list-style-type: none"> (a) Engines of trucks and mobile plant to be switched off when not in use. (b) Maintain and service plant in accordance with manufacturer's specifications. (c) Sweep trafficable areas at least once daily. (d) Limit vehicle speeds to 20 km/h. (e) Cover vehicle loads before leaving the site. (f) Reduce drop heights during loading and unloading of material. 	<p><i>Air Quality Management Plan, GHD, 22 February 2018, Version 1</i></p> <p>Site inspection.</p>	<p>Beyond the scope of this audit</p> <p>Mitigation measures for dust have been incorporated into the AQMP.</p> <p>Controls have been generally implemented on site. Refer also to Table A1, Condition B32.</p>	Compliant
AQ Odour	<p>Odour Management</p> <p>Any incoming loads containing odorous materials will be identified immediately and rejected from the site. The following odour management measures will be implemented during the operation of the development:</p> <p>Procedures for staff to report the presence of odours.</p> <p>Maintaining an odour complaint register which captures any complaints from off-site receptors.</p>	<p><i>Operational Environmental Management Plan, GHD, 14 March 2018, Version 5</i></p> <p><i>Air Quality Management Plan, GHD, 22 February 2018, Version 1</i></p>	<p>Mitigation measures for odour have been incorporated into the AQMP.</p> <p>Complaints management procedures are provided in the OEMP.</p>	Compliant

Aspect	Commitment	Evidence Collected	Audit findings and recommendations	Compliance Status
N&V – Noise and vibration	<p>Implement all measures acoustic impact control contained in Appendix 15 of the EIS as amended by measures contained in Attachment 11 to the RTS as follows:</p> <ol style="list-style-type: none"> Standard construction work hours will be as follows: Monday to Friday 7.00 am to 6.00 pm. Saturday 8.00 am to 1.00 pm. No work on Sundays or public holiday. Mobile plant used will be fitted with residential grade silencers. At all times, but particularly prior to 7:00 am, trucks will be loaded in a quiet manner. 4. Plant based at the site will be fitted with "quacker" style reversing alarms. 	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p>	<p>Construction related work hours are not applicable to the operations. Operating hours specified in the Condition B24 prevail.</p> <p>The following mitigation measures have not been incorporated into the Section 9.5 of the OEMP.</p> <ul style="list-style-type: none"> Plant based at the site will be fitted with "quacker" style reversing alarms. <p>Refer to Recommendation R-12 in Section 4.1 of the report.</p>	Non-compliant
T&T - Traffic and Transport	<ol style="list-style-type: none"> All new truck drivers will be provided with Site Induction for Drivers form at the site entrance. Drivers will be provided with Site Traffic Management Policy. All loads must be fully covered prior to leaving the Site. 20 kph speed limit on internal road. 5. All vehicles are to enter and leave the Site in a forward direction. 	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p>	<p>Mitigation measures are incorporated into Section 9.8 of the OEMP.</p>	Compliant
	<p>Access</p> <p>The existing western crossing is to be widened to 13.5 metres with ingress for all waste materials incoming and egress for processed materials out separated by a raised concrete median 1 metre wide.</p> <p>The existing eastern crossing is to be a combined entry and exit crossing for staff and visitors' vehicles. No amendments are required to the existing crossing.</p> <p>Signage will be installed at each crossing to state the proposed use i.e. Staff and Visitor Access Only and Truck and Car/Trailer/Emergency Appliance Access with pavement arrows or signage to show entry and exit crossings.</p>	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p>Site inspection</p>	<p>Confirmed on-site</p>	

Aspect	Commitment	Evidence Collected	Audit findings and recommendations	Compliance Status
	<p>Internal Circulation</p> <p>A 6 metre wide carriageway will be provided around the perimeter of the manufacturing building for emergency NSW Fire Brigade aerial appliances. These vehicles will enter and exit via the western crossing and travel in a clockwise direction.</p> <p>All vehicles delivering waste materials for recycling will enter from the western crossing travel over the weighbridge and unload at the northern raw feed stockpile and travel in a clockwise direction to the weighbridge and exit crossing.</p> <p>Empty B Doubles and other trucks used to transport processed PEF for export and local users will enter from the western crossing, travel in an anti-clockwise direction to the bagged PEF produce, load and travel to the weighbridge and then to the exit.</p>	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p> <p>Site inspection</p>	Confirmed on-site	
	<p>A total of 42 off street spaces will be provided.</p>	<p>Appendix 1 of the Approval,</p> <p>Site inspection</p>	<p>42 parking spaces were provided however they were not all available at the time of the site inspections due to the storage of excess PEF bales.</p> <p>Refer to Table A1, Condition B39.</p>	
SW - Surface water	<ol style="list-style-type: none"> 1. Install and maintain water management structures to contain and treat all rainfall and runoff as per Appendix 19 of the EIS and Attachment 15 to the RTS. 2. Minimise the area of disturbance. 3. Install tank farm to store stormwater collected on the site for re-use in dust mitigation. 	<p><i>Water Management Plan</i>, GHD, 9 March 2018, Version 3</p> <p><i>Leachate Management Plan</i>, GHD, 12 March 2018, Version 3</p> <p>Site inspection</p>	<p>Mitigation measures incorporated into the management plans.</p> <p>Controls were implemented on site.</p>	
TM - Tree management	<p>All tree retention and landscaping works will be implemented as detailed in drawings prepared by Tract Landscape Architects as contained in Appendix 12 of the EIS, as amended by plans contained in Attachment 15 to the RTS.</p>	<p><i>Landscape Management Plan</i>, GHD, 22 February 2018, Version 1</p>	<p>Landscape Management Plan addressed the tree management requirements</p>	Compliant
Hazard and risk	<ol style="list-style-type: none"> 1. Spill kits will be provided in the workshop, storage shed and adjacent to the diesel fuel tank. 2. Staff will be trained in spill cleanup procedures and use of the spill kits at the site. 	<p><i>Operational Environmental Management Plan</i>, GHD, 14 March 2018, Version 5</p>	<p>Mitigation measures incorporated in Section 9.10 of the OEMP.</p>	Compliant

Aspect	Commitment	Evidence Collected	Audit findings and recommendations	Compliance Status
	<ol style="list-style-type: none"> 3. A dry powder fire extinguisher will be installed in the workshop and adjacent to the diesel fuel tank. 4. Staff will be trained in the use of first attack firefighting. 5. A procedure for the refuelling of mobile plant will be developed and implemented. 			
WM - Waste management	<ol style="list-style-type: none"> 1. I. Separate receptacles will be provided for recyclables to be taken off site for recycling. 2. Non-recyclable waste will be disposed of at registered landfill. 3. No putrescible material will be disposed of on site. 4. Employees will be encouraged to adopt waste-reducing practices. 	<p><i>Operational Environmental Management Plan, GHD, 14 March 2018, Version 5</i></p>	<p>Mitigation measures incorporated in Section 9.7 of the OEMP.</p>	<p>Compliant</p>
CM - Complaints management	<ol style="list-style-type: none"> 1. 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 ResourceCo website. 2. 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. 3. All complaints will be brought to the attention of the Environmental Officer immediately. 4. The Environmental Officer will identify and initiate appropriate action in response to complaint and follow-up contact with complainant. 5. Any complaints received will be reviewed to ascertain if site management requires amendment. 	<p><i>Operational Environmental Management Plan, GHD, 14 March 2018, Version 5</i></p>	<p>Complaints management was incorporated in Section 9.9 of the OEMP.</p>	<p>Compliant</p>

Appendix A: Table A5 – Environmental Impact Statement predictions

EIS Section	EIS requirement	Evidence collected	Audit findings	Compliance Status
2.2	OVERVIEW			
	The objectives of the proposal are:			
	(a) To establish a commercially viable Waste and Resource Management Facility which is capable of recovering waste from the waste stream for reuse.	Site inspection	The facility recovers waste from the waste stream for reuse. Commercial viability is beyond the scope of this audit.	Compliant
	(b) To assist the NSW State government in achieving its objectives for the recovery and recycling of waste as detailed in the NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.	General	The facility assists the NSW State government in achieving its objectives for the recovery and recycling of waste.	Compliant
	(c) To establish an environmentally responsible and sustainable industry which would create employment.	General	The facility has created local employment and is environmentally responsible and sustainable.	Compliant
	The proposed facility has the capability to convert up to 250,000 tonnes of raw material per annum into approximately 150,000 tonnes of PEF and over 75,000 tonnes of reusable commodities such as metal, wood, concrete, bricks, rubble and soil.		Refer to Table A1, Condition A6	Compliant
	All salvaged metals are transported to approved recycling facilities.		Refer to Table A1, Condition B4	Compliant
	ResourceCo will transport the inert fractions such as aggregates and soil to approved recycling facilities to process for resupply to the civil construction market.			
5.5	OPERATIONAL NOISE			
	The predicted noise levels meet the relevant criteria at all assessment locations for both adverse and neutral conditions. This is based on comparing the typical worst-case daytime operations with criteria for all periods even though night time operations are likely to generate much lower noise levels.		Refer to Table A1, Condition B28	Compliant
5.6.2	TRAFFIC NOISE			
	Given the existing high traffic volumes on all the roads where residences are located, existing noise levels are likely to exceed the RNP base criterion. The increased noise level due to traffic from the proposed recycling facility is calculated to be 0.2dB at	Site observation	The facility is located within an industrial area surrounded by other heavy haulage operations	Compliant

	daytime and less than 0.1dB at night time. This is significantly below the 2dB increase which is described as noticeable and negligible impact is therefore expected.			
6.7.2	AIR QUALITY			
	The air quality impact assessment has demonstrated that the facility is expected to comply with relevant air quality criteria (odour and dust). Notwithstanding, responsible developments should implement reasonable and feasible measures to reduce their burden on local and regional air quality.	Site observation	The site has not received any complaints in relation to dust. During the site inspection, there was no visible airborne dust evident outside of the process building, however, there has been no environmental monitoring for dust impacts from the operation.	Compliant
			No offensive odours were emanating from the site at the time of the inspection. There are no records of odour complaints from surrounding businesses.	Compliant
8	VISUAL IMPACT			
	There is no visibility of the Site from residential areas.		The facility is located within an industrial area	Compliant
	There are limited and heavily screened views into the southern part of the Site from Frank Street. As seen on the plans of the proposed development, and the landscape plan, the frontage of the Site will accommodate the office and workshop complex.	Landscape Management Plan, GHD, 22 February 2018, Version 1	The office complex provides a screen for the scale of the development from the street frontage. The front boundary of the site is landscaped in accordance with the Landscape Management Plan, and when established, the landscaping will provide further screening.	Compliant
	The visible component of the proposed development would be restricted to the car park and associated office complex and the arrival and departure of trucks servicing the Site.	Site inspection		Compliant
9.6	SURFACE WATER IMPACT ASSESSMENT			
	Rainwater collected from the roofs of the buildings is estimated to provide: <ul style="list-style-type: none"> 30% of the water required for the waste processing (a saving of potable water of 4.49 ML/year). 82% of the water required for toilet flushing and landscape watering (a saving of potable water of 0.33 ML/year). 	Not measured		
	The proposed diesel fuel tank will be fully enclosed and self-bunded. There will, therefore, be no risk of hydrocarbons draining to the stormwater system.	Site inspection	Diesel is contained within a self-bunded (double skinned) tank, under cover and surrounded by a drive over bund.	Compliant
	The Site will be fully sealed and would, therefore, have no impact on any groundwater underlying the Site	Site inspection	All work areas of the site are concrete paved. The perimeter emergency vehicle road is paved with bitumen.	Compliant

			Landscaped areas are protected by kerbs in the event of a spill.	
10.6	TRAFFIC IMPACTS			
	The western vehicular crossing is to be widened to 13.5 metres and constructed in compliance with Fairfield City Council's standard for heavy duty vehicular crossings.	Site inspection	Confirmed	Compliant
	The ingress and egress crossings are separated by a raised 1 metre wide concrete median.	Site inspection	Confirmed	Compliant
	The swept paths of B Doubles for access to and from stockpiles of baled PEF, swept paths of a 19m long articulated vehicle or truck and dog trailer for deliveries of raw waste material, and for NSW Fire Brigade aerial appliances to circulate around the perimeter road.	Site inspection	Confirmed	Compliant
	The car parking provision on-site meets the maximum parking demand by staff at the mid-afternoon shift change.	Site inspection	Parking in accordance with the Appendix 1 of the Approval has been provided. Refer to Table A1, Condition B39 Refer to Recommendation R-06 in Section 4.1 of the report.	Non - compliant
	Effects of Increased Traffic on Intersection Performance. The increase in heavy and light vehicle traffic movements in peak hours due to the operation of the proposed development are relatively minor at all intersections. All other intersections analysed using SIDRA 6.1 will continue to provide satisfactory performance.	Not assessed	No traffic studies have been undertaken	
	Effects of Increased Traffic on Road Network. Traffic increases from the development are small increases and will have minimal effect on the performance of the road network. (Appendix 13 Table 4.2)	Not assessed	No traffic studies have been undertaken	
11.3	SOCIO-ECONOMIC IMPACTS			
	Waste Resource Management Facility would provide employment for approximately 40 staff at this location.	Interviews	The ResourceCo EHS office advised the facility was employing 50 staff including 25 permanent staff.	Compliant
	Opportunities for suppliers to provide various goods and services to the Site, including materials, operational fuels, machinery, and equipment. Opportunities for local businesses to fulfil maintenance and servicing requirements.	Interviews	The facility is supporting local businesses including the following (as a sample) <ul style="list-style-type: none"> RSEA safety in Wetherill park supply safety equipment Officeworks in Wetherill park 	Compliant

			<ul style="list-style-type: none"> • Blackwoods in Wetherill park • Service of plant and equipment via Toyota and Cat lease • Momentum – day labour for fitters and turners • Labour hire - CK recruitment, Makaibe Recruitment, Randstad
	Convenient, locally supported, cost-effective disposal of commercial and industrial waste	Not assessed	
	The money which would be spent on consumables, along with the significant flow-on benefits, would result in a substantial stimulus to the local and regional economies	Not assessed	
	The facility would contribute to the ongoing sustainability of the NSW economy through the provision of efficient waste management infrastructure as the population and commercial expansion of Sydney generates additional waste	Not assessed	
12	HAZARD AND RISKS		
	Diesel fuel would be stored in a purpose built, self-bunded 30,000 L tank which would comply with the requirements of the relevant Australian Standard.	Site inspection	Diesel is contained within a self-bunded (double skinned) tank, under cover and surrounded by a drive over bund. Compliant
	A dry powder type fire extinguisher would be installed adjacent to the diesel tank storage area	Site inspection	Confirmed Compliant
	All runoff from the operational area of the Site which is not diverted to storage tanks for re-use on the Site, is captured in sumps.	Site inspection	The stormwater system has been constructed in accordance with Appendix A of the approval. Compliant
	A dedicated refuelling procedure would be established for mobile plant, and when such plant is refuelled.	SOP 223 Refuelling Mobile Plant	Refuelling procedure sighted. Compliant
13.5	WASTE MANAGEMENT		
	Operational activities will implement the waste hierarchy to reduce waste from office, packaging, amenity and maintenance activities (implied).	Site inspection	Confirmed Compliant

Appendix B –

Planning secretary audit team agreement



Contact: Elizabeth Williamson
Phone: (02) 8289 6610
Email: compliance@planning.nsw.gov.au

Cleanaway ResourceCo RRF Pty Ltd
Level 3
11-16 South Terrace
ADELAIDE SA 5000

Attention: Bill Hudson, Operations Manager NSW

Email: BillH@resourceco.com.au

Dear Mr Hudson

**ResourceCo Resource Recovery Waste Facility Wetherill Park (SSD 7256)
– Endorsement of IEA Auditors**

I refer to the Independent Environmental Audit Program (IEA Program) for the ResourceCo Resource Recovery Facility Wetherill Park (ResourceCo) provided to the Department of Planning and Environment (Department) on 15 November 2018. The IEA Program was prepared by Mr Maurice Pignatelli of OptimE to satisfy the requirements of Condition C12 of the Development Consent SSD 7256 (Consent).

The Department acknowledges receipt of the IEA Program and endorses the proposed auditor. Approval is granted having considered the qualification and experience of Mr Maurice Pignatelli. This approval is conditional upon the auditors' independence from the Project.¹

The Department notes that ResourceCo have sought an extension for the submission of the Independent Audit Report (IEA) to the Department. The Department grants an extension for the submission of the IEA until **5pm on 6 March 2019**.

In preparing the IEA, you should ensure the audit:

- Is conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and the Department's Independent Audit Post Approval Requirements (**IAPAR**), dated June 2018, available at <https://www.planning.nsw.gov.au/~media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.ashx>;
- Includes a compliance table indicating the compliance status of each condition of the Consent (and any other statutory instrument required to be audited);
- Avoids terms such as "partial compliance". An audit is to make findings of either "compliance" or "non-compliance";
- Includes recommended actions in response to non-compliances; and
- Identifies opportunities for improved environmental management and performance.

¹ Please note that auditors must declare any actual, potential or perceived conflicts of interest. Please refer to the Department's Independent Audit Post Approval Requirements linked in the body of this letter.



Finally, the Department requests that you:

- Review the IEA report to ensure it complies with the relevant conditions of consent, prior to submitting the report to the Secretary; and
- Submit an action plan with the audit report(s) detailing your response to the auditor's recommendations and timeframes to implement any adopted recommendations.

Please note that as the Consent was already in existence when the IAPAR was released, you may elect to voluntarily comply with the IAPAR but compliance with the Conditions of Consent takes priority.

Should you have any further enquiries about this matter, please contact Elizabeth Williamson on (02) 8289 6610 or at compliance@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C Mathieson', followed by a horizontal line.

17.12.2018

Chris Mathieson
Team Leader – Compliance (Metro)
As Nominee of the Secretary

From: Elizabeth Williamson <Elizabeth.Williamson@planning.nsw.gov.au>
Sent: Tuesday, 26 February 2019 4:31 PM
To: Temba Mtshiya <TembaM@resourceco.com.au>
Subject: FW: Request for an extension of the due date for the IEA for ResourceCo.

Good afternoon Temba,

I refer to your email below. The Department of Planning and Environment approves the extension of time for the ResourceCo IEA submission to **COB 19 March 2019**.

Kind regards,

Elizabeth Williamson
Senior Compliance Officer
Compliance
Level 30, 320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 02 8289 6610 | M 0447 041 325

General Compliance email: compliance@planning.nsw.gov.au



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Appendix C – Consultation with agencies



Waste and Resource Recovery Branch
NSW Environment Protection Authority
PO Box A290
Sydney South
NSW 1232
info@environment.nsw.gov.au

Dear Sir/Madam

**Independent Environmental Audit of Resource Co at 35-37 Frank Street, Wetherill Park
Development Consent SSD 7256
Request for comment**

OptimE Pty Ltd has been engaged by ResourceCo to undertake an independent audit of its facility at 35-37 Frank Street, Wetherill Park in accordance with its development consent SSD 7256 granted by the Department of Planning and Environment. The development consent specifies that the audit is to consult with relevant agencies and:

- 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)
- review the adequacy of any approved strategy, plan or program required under the consents; and
- recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under the consents.

The ResourceCo development consent has several auditable obligations which may be of interest to the NSW Environment Protection Authority (EPA). These have been summarised in the attachment to this letter. I am writing to you to invite comment from the EPA regarding these obligations.

It would be appreciated if you could provide your comments regarding the performance of ResourceCo in meeting these obligations under the following headings:

- Compliance with requirements
- Progress in meeting requirements
- Details of any specific incidents or non-compliance
- Adequacy of actions being undertaken
- ResourceCo performance on any other requirements of the development consent you deem appropriate.

Upon receipt of this letter please advise me of the primary contact within your organisation that will be coordinating this request. It would be appreciated if you could submit your written comments by Friday 15 February 2019 or advise of an alternate mutually suitable timeframe.

All correspondence in relation to this matter should be directed to Maurice Pignatelli, Lead Auditor on 0407493176 or maurice@optimenv.com.au.



Your faithfully

A handwritten signature in black ink, appearing to read 'M. Pignatelli', written in a cursive style.

Maurice Pignatelli
Lead Auditor
18 January 2019

Attachment 1 - Development consent conditions relevant to the EPA



Attachment 1 - Development consent SSD 7256 - Conditions relevant to the EPA

Statutory Requirements	
A12	The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.
Waste Screening and Acceptance	
B1	<p>The Applicant must:</p> <p>(a) implement auditable procedures to:</p> <ul style="list-style-type: none"> 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. <p>(b) ensure that:</p> <ul style="list-style-type: none"> i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and ii. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited wastes such as asbestos.
Waste Storage and Processing	
B2	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.
B3	All processed and unprocessed waste must be stored within the building on the site. Processed, wrapped and baled PEF may be stored in the area designated on the approved plans in Appendix 1 for the outdoor storage of PEF.
Statutory Requirements	
B4.	All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste.
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.
B6.	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.
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 Secretary.

Energy from Waste Management Plan	
B8	<p>Prior to the commencement of operations, the Applicant must prepare an Energy from Waste Management Plan (EfWMP). The EfWMP must:</p> <ul style="list-style-type: none"> • be prepared in consultation with the EPA and to the satisfaction of the Secretary; • detail the procedures to ensure full and ongoing compliance with the NSW Energy from Waste Policy, including: <ul style="list-style-type: none"> • details of how the receipt of incoming waste (feedstock) from waste processing facilities or collection systems complies with the resource recovery criteria specified in Table 1 of the EPA's Energy from Waste Policy Statement for each waste stream; • details of how the Applicant will compile and calculate percentages of incoming waste streams every three months and retain this information for submission to the EPA on request; • a procedure for providing evidence to the EPA that incoming material was previously going to landfill; • a procedure for the management of out of specification PEF; and • a requirement that out of specification PEF material would not be reprocessed until further analysis demonstrates that it meets the relevant criteria. • define calibration procedures and operating thresholds for the online analyser that will be used to measure real-time chlorine, calorific value and moisture content of the PEF.
B9	<p>The Applicant shall ensure the Energy from Waste Management Plan (as required and approved by the Secretary from time to time) is implemented for the operational life of the development.</p>
Waste Monitoring Program	
B10	<p>From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the development. The program must:</p> <ol style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; b) include suitable provision to monitor on a daily basis the: <ol style="list-style-type: none"> i. quantity, type and source of waste received on site; and ii. quantity, type, quality and destination of the outputs produced on site; c) ensure that: <ol style="list-style-type: none"> i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and ii. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste, including asbestos; and iii. require that all weighbridge data be retained for the life of the development and be made immediately available on request to the Secretary and/or the EPA.

Imported Soil	
B13	<p>The Applicant must:</p> <ul style="list-style-type: none"> a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site; b) keep accurate records of the volume and type of fill to be used; and c) make these records available to the Department upon request.
Discharge Limits	
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>







DOC19/66293

Maurice Pignatelli
Lead Auditor
OptimE Pty Ltd
24 Grays Point Rd
GRAYS POINT NSW 2232

EMAIL

Dear Mr Pignatelli

Environmental Audit – Resource Co - Environment Protection Licence no. 20937

I refer to your letter dated 18 January 2019 to the Environment Protection Authority (**EPA**) in relation to an environmental audit of the ResourceCo facility located at 35-37 Frank St Wetherill Park (**the Premises**). Scheduled activities at the Premises are regulated under environment protection licence no. 20937 (**the Licence**).

The Licence was issued by the EPA on 9 May 2017. Since that time, the EPA has conducted three inspections of the Premises.

To date, the EPA has not taken any regulatory action in relation to the Licence or scheduled activities at the Premises.

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

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

If you have any questions regarding this matter, please don't hesitate to contact Deanne Pitts on 9995 5752.

Yours sincerely

A handwritten signature in black ink, appearing to read 'CF', written over a faint circular stamp.

29 January 2019

CELESTE FORESTAL
Unit Head Waste Compliance
Environment Protection Authority

Phone 131 555

Phone +61 2 9995 5555
(from outside NSW)

Fax +61 2 9995 5999

TTY 133 677

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Structure Fire Safety Unit
Fire and Rescue NSW
Locked Mail Bag12
Greenacre NSW 2190
firesafety@fire.nsw.gov.au

Dear Sir/Madam

**Independent Environmental Audit of Resource Co at 35-37 Frank Street, Wetherill Park
Development Consent SSD 7256
Request for comment**

OptimE Pty Ltd has been engaged by ResourceCo to undertake an independent audit of its facility at 35-37 Frank Street, Wetherill Park in accordance with its development consent SSD 7256 granted by the Department of Planning and Environment. The development consent specifies that the audit is to consult with relevant agencies and:

- 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)
- review the adequacy of any approved strategy, plan or program required under the consents; and
- recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under the consents.

The ResourceCo development consent has several auditable obligations which may be of interest to Fire and Rescue NSW (FRNSW). These have been summarised in the attachment to this letter. I am writing to you to invite comment from the FRNSW regarding these obligations.

It would be appreciated if you could provide your comments regarding the performance of ResourceCo in meeting these obligations under the following headings:

- Compliance with requirements
- Progress in meeting requirements
- Details of any specific incidents or non-compliance
- Adequacy of actions being undertaken
- ResourceCo performance on any other requirements of the development consent you deem appropriate.

Upon receipt of this letter please advise me of the primary contact within your organisation that will be coordinating this request. It would be appreciated if you could submit your written comments by Friday 15 February 2019 or advise of an alternate mutually suitable timeframe.

All correspondence in relation to this matter should be directed to Maurice Pignatelli, Lead Auditor on 0407493176 or maurice@optimenv.com.au.



Your faithfully

A handwritten signature in black ink, appearing to read 'M. Pignatelli', written in a cursive style.

Maurice Pignatelli
Lead Auditor
17 January 2019

Attachment 1 - Development consent conditions relevant to FRNSW

Attachment 1 - Development consent SSD 7256 - Conditions relevant to the FRNSW

Structural adequacy and Certification	
A14	The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA.
A15	Prior to the commencement of construction, the final design of the development must be finalised in consultation with and to the satisfaction of Fire and Rescue NSW and include suitable additional provisions for special hazards by specifically addressing Clauses E1 .10 and E2.3 of Volume One of the National Construction Code (NCC) Series.
A16	Prior to the issue of a Construction Certificate for a building or structure, a Construction Certificate (Engineering Approval) must be submitted to the Certifying Authority for the construction of a new inlet pit and alteration of an existing pit and the connection of the drainage pipe into the existing stormwater drainage pipe within the easement, laybacks, access driveways and replacement of damaged footpaths, in accordance with approved plans.



From: [Nathan Everett](#)
To: [Maurice Pignatelli](#)
Cc: [Fire Safety](#)
Subject: FRNSW response to request for comment - ResourceCo Wetherill Park (SSD 7256) - BFS19/162
Date: Wednesday, 6 February 2019 2:01:42 PM
Attachments: [image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)

Dear Maurice,

Thank you for your time on the phone yesterday to discuss ResourceCo's Wetherill Park facility (SSD 7256).

I understand that you have been engaged by ResourceCo to undertake an independent audit in order to ensure that conditions imposed by the development consent are being observed. Specifically, the following conditions have relevance to Fire & Rescue NSW (FRNSW) as advised in your letter dated 17 January 2019:

- Compliance with requirements
- Progress in meeting requirements
- Details of any specific incidents or non-compliance
- Adequacy of actions being undertaken
- ResourceCo performance on any other requirements of the development consent you deem appropriate

The following comments are offered by FRNSW in response to the above conditions.

- FRNSW are unable to comment on conditions regarding; compliance with requirements, details of any specific incidents or non-compliance, or adequacy of actions being undertaken, as these are the responsibility of the certifying authority. FRNSW's comments are limited to conditions directly pertaining to satisfaction regarding adequacy of meetings and consultation relating to FRNSW stakeholder engagement.
- ResourceCo engaged FRNSW by way of the Fire Engineering Brief Questionnaire (FEBQ) process during the design phase of works (FEBQ version 1 submitted on 23 December 2016, final response to version 2 provided on 09 February 2017, document D17/7649) . This afforded ResourceCo the opportunity to undertake consultation with FRNSW and receive comment and recommendations regarding the proposed design of fire and life-safety systems.
- ResourceCo submitted to FRNSW the reports required under section 144 of the Environmental Planning and Assessment Regulation 2000, namely an Initial Fire Safety Report (BFS17/795, 17 April 2017) and Final Fire Safety Reports (BFS18/1123, 30 April 2018 and BFS18/1209, 08 May 2018).
- An occupation certificate inspection was undertaken by FRNSW (letter and corresponding report dated 12 June 2018, documents D18/38385 and D18/38384 respectively) pursuant to section 152 of the Environmental Planning and Assessment Regulation 2000. A number of recommendations were made to the certifying authority in regard to the fire and life-safety systems. Where such recommendations are not adopted, the certifying authority is required under clause 6B of section 144 of the

Environmental Planning and Assessment Regulation 2000 to provide the Fire Commissioner written notice of the fact that recommendations were not adopted and reasons why. To date no such notification has been received.

- ResourceCo undertook extensive consultation including a meeting with FRNSW in regard to the Leachate Management Plan (BFS17/1799, 08 August 2017) and the design of protection systems (BFS17/866, 26 April 2017).
- FRNSW were notified of a modification to the development and were provided an opportunity to review and comment on changes.

FRNSW are satisfied that to date there has been adequate consultation with ResourceCo in regard to their Wetherill Park facility.

Please do not hesitate to contact me should you have any questions regarding the above.

Kind Regards,

Nathan



QUALIFIED FIREFIGHTER NATHAN EVERETT

FIRE SAFETY OFFICER
FIRE SAFETY INFRASTRUCTURE LIAISON
T: (02) 9742 7533 M: 0436 624 025
1 Amarina Ave, Greenacre, NSW 2190
www.fire.nsw.gov.au



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Views expressed in the message are those of the individual sender, and are not necessarily the views of Fire & Rescue NSW. Use of electronic mail is subject to FRNSW policy and guidelines. FRNSW reserves the right to filter, inspect, copy, store and disclose the

contents of electronic mail messages, as authorised by law.

This message has been scanned for viruses.



City Manager
Fairfield City Council
PO Box 21
Fairfield
NSW 1860
mail@fairfieldcity.nsw.gov.au

Attention – Mr Alan Young

Dear Alan

**Independent Environmental Audit of Resource Co at 35-37 Frank Street, Wetherill Park
Development Consent SSD 7256
Request for comment**

OptimE Pty Ltd has been engaged by ResourceCo to undertake an independent audit of its facility at 35-37 Frank Street, Wetherill Park in accordance with its development consent SSD 7256 granted by the Department of Planning and Environment. The development consent specifies that the audit is to consult with relevant agencies and:

- 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)
- review the adequacy of any approved strategy, plan or program required under the consents; and
- recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under the consents.

The ResourceCo development consent has several auditable obligations which may be of interest to Fairfield City Council. These have been summarised in the attachment to this letter. I am writing to you to invite comment from the Fairfield City regarding these obligations.

It would be appreciated if you could provide your comments regarding the performance of ResourceCo in meeting these obligations under the following headings:

- Compliance with requirements
- Progress in meeting requirements
- Details of any specific incidents or non-compliance
- Adequacy of actions being undertaken
- ResourceCo performance on any other requirements of the development consent you deem appropriate.

Upon receipt of this letter please advise me of the primary contact within your organisation that will be coordinating this request. It would be appreciated if you could submit your written comments by Friday 15 February 2019 or advise of an alternate mutually suitable timeframe.



All correspondence in relation to this matter should be directed to Maurice Pignatelli, Lead Auditor on 0407493176 or maurice@optimenv.com.au.

Your sincerely

A handwritten signature in black ink, appearing to read 'M. Pignatelli', written in a cursive style.

Maurice Pignatelli
Lead Auditor
18 January 2019

Attachment 1 - Development consent conditions relevant to Fairfield City Council

Attachment 1 - Development consent SSD 7256 - Conditions relevant to the Fairfield City Council

Dispute Resolution	
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 Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.
Statutory Requirements	
A12	The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.
Demolition	
A13	The Applicant must ensure that all demolition associated with the development is carried out in accordance with Australian Standard AS 2601 :2001: The Demolition of Structures, or its latest version and the requirements of the Work Health and Safety Regulation, 2011.
Structural adequacy and Certification	
A14	The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA.
A15	Prior to the commencement of construction, the final design of the development must be finalised in consultation with and to the satisfaction of Fire and Rescue NSW and include suitable additional provisions for special hazards by specifically addressing Clauses E1 .10 and E2.3 of Volume One of the National Construction Code (NCC) Series.
A16	Prior to the issue of a Construction Certificate for a building or structure, a Construction Certificate (Engineering Approval) must be submitted to the Certifying Authority for the construction of a new inlet pit and alteration of an existing pit and the connection of the drainage pipe into the existing stormwater drainage pipe within the easement, laybacks, access driveways and replacement of damaged footpaths, in accordance with approved plans.
Utilities and Services	
A17	Prior to the construction of any utility works associated with the development, the Applicant must obtain the relevant approvals from service providers.
A18	Prior to the commencement of operation, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.
A19	Prior to the issue of the Final Occupation Certificate, adjustments to any public utilities necessitated by the development are to be completed in accordance with the requirements of the relevant Authority. Any utility costs are to be at no cost to Council.

Protection of Public Infrastructure	
A20	<p>Prior to the commencement of earthworks, the Applicant must:</p> <p>(a) consult with the relevant owner and/or provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure;</p> <p>(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</p> <p>(c) submit a copy of this report to the Secretary and Council.</p>
A21	<p>The Applicant must:</p> <p>(a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.</p>
Development Contributions	
A22	<p>Prior to the issue of a Construction Certificate for any part of the development, the Applicant must pay \$241,930 to Council in accordance with the Fairfield City Council Indirect (Section 94A) Development Contributions Plan 2011.</p> <p><i>Note: The contribution amount payable may be adjusted at the date of payment. Any unpaid contributions will be adjusted on a quarterly basis to account for movements in the Australian Bureau of Statistics, Producer Price Index - Building Construction (New South Wales).</i></p>
Operation of plant and equipment	
A23	<p>The Applicant must ensure that all plant and equipment used for the development is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner.</p>
Surrender of Consent	
A24	<p>In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant must and in the manner prescribed by clause 97 of the EP&A Regulation, surrender all current development consents associated with the site prior to the issue of an Occupation Certificate for the development.</p>

Appendix D – Independent audit declaration form

Appendix D – Independent Audit Declaration Form

Project Name: Cleanaway ResourceCo RRF

Consent Number: SSD 7256

Description of Project: Waste and Resource Management Facility

Project Address: 35-37 Frank St, Wetherill Park NSW

Proponent: Cleanaway ResourceCo RRF Pty Ltd

Title of Audit: Cleanaway ResourceCo RRF, Independent Environmental Audit

Date: 18 March 2019

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2018);
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor: Maurice Pignatelli



Signature:






Qualification: Bachelor of Engineering (Civil), Master of Engineering Science (Public Health)


Company: OptimE Pty Ltd

Address: 24 Grays pint Road, Grays Point NSW





Appendix E – Site inspection photographs

Appendix E - Site Inspection and photographs



Reference	Observations	Photograph	Compliance Status
	<p>Heavy vehicle access with 13m driveway and 1 m island. Signage at front gate.</p>		<p>Compliant</p>
	<p>Functioning wheel wash facility for out-bound heavy vehicles</p>		<p>Compliant</p>
	<p>Weighbridge</p>		<p>Compliant</p>
	<p>PEF bales located outside of the designed storage area</p>		<p>Non-compliant</p>
	<p>Weighbridge, digital display, CCTV camera and weather station.</p>		<p>Compliant</p>

Reference	Observations	Photograph	Compliance Status
	<p>PEF bales located on the staff carpark -outside of the designated PEF storage area. <i>The bales had been relocated from the staff carpark for the second site inspection. Staff were using the carpark.</i></p>		<p>Non-compliant</p>
	<p>PEF litter and debris located on hardstand areas outside of the workshop and across the staff carpark area.</p>		<p>Non-compliant</p>
	<p>PEF bales located along the western driveway outside of the designated PEF storage area.</p>		<p>Non-compliant</p>
	<p>PEF debris and litter observed across the site.</p>		<p>Non-compliant</p>
	<p>Baler with accumulated PEF debris. Collection bin beneath the baler requires emptying on a regular basis. <i>Cleanaway ResourceCo advised that mitigation measures are proposed for this area.</i></p>		<p>Non-compliant</p>
	<p>Dust accumulated within the PEF baler enclosure <i>Cleanaway ResourceCo advised that mitigation measures are proposed for this area.</i></p>		<p>Non-compliant</p>

Reference	Observations	Photograph	Compliance Status
	<p>Site personnel observed sweeping PEF debris around the baler</p>		<p>Compliant</p>
	<p>PEF litter and debris accumulating at stormwater drains along the western driveway</p>		<p>Non-compliant</p>
	<p>No landscaping was observed along the western boundary fence</p>		<p>Non-compliant</p>
	<p>Drains are labelled with 100mm yellow lettering Drains to the Georges River”</p>		<p>Compliant</p>
	<p>Drain warden are installed in the pits</p>		<p>Compliant</p>
	<p>PEF litter and debris accumulating at stormwater drains along the western driveway</p>		<p>Non-compliant</p>
	<p>No landscaping was observed along the western boundary fence</p>		<p>Non-compliant</p>
	<p>Drains are labelled with 100mm yellow lettering “Drains to the Georges River”</p>		<p>Compliant</p>
	<p>Drain warden are installed in the pits</p>		<p>Compliant</p>
	<p>Vehicle unloading at the waste receivals area within manufacturing building. Waste receivals “spotter” monitoring incoming wastes.</p>		<p>Compliant</p>

Reference	Observations	Photograph	Compliance Status
	<p>Hazardous materials removed from waste stream and stockpiled prior to removal off site.</p> <p>Hazardous materials include:</p> <ul style="list-style-type: none"> • Gas cylinders, • container of liquids, • batteries. 		Compliant
	<p>Loading of separator from the receival area floor.</p> <p>No odours detected in the waste receivals area</p>		Compliant
	<p>Excessive dust generated by the separation plant.</p> <p>Site personnel advise excess dust may be attributable to the Double Drum Separator and hammer mill.</p> <p><i>Cleanaway ResourceCo advised that mitigation measures have been identified.</i></p>		Non-compliant
	<p>Dust plume within manufacturing building.</p> <p>Access doors open on the western side open due to a mechanical fault with the door.</p> <p><i>Cleanaway ResourceCo confirmed that the door has been repaired since the site inspection.</i></p>		Non-compliant


Reference	Observations	Photograph	Compliance Status
	<p>Labelled compartments designated for waste streams</p>		<p>Compliant</p>
	<p>PEF stockpile within the manufacturing building</p>		<p>Compliant</p>
	<p>Double skinned diesel fuel tank. Refuelling is enclosed within a drive over bund.</p>		<p>Compliant</p>
	<p>Drums of oils and lubricants stored within the workshop on portable pallets.</p>		<p>Compliant</p>

Reference	Observations	Photograph	Compliance Status
	<p>Oxygen and acetylene cages located in close-proximity. Cages should be 3m apart.</p> <p>Oil drum located in an unbunded area at the entrance to the workshop.</p> <p><i>The oil drum was re-located to a bunded area prior to the second site inspection.</i></p>		<p>Non-compliant</p> <hr/> <p>Compliant</p>
	<p>Class 2 and Class 3 substances co-located in a flammable cabinet. Materials should be segregated by at least 3m.</p>		<p>Non-compliant</p>
	<p>Stocked spill kit located within the workshop area however access to the spill kit was obstructed.</p> <p><i>The spill kit was re-located to an accessible area prior to the second site inspection.</i></p>		<p>Non-compliant</p> <hr/> <p>Compliant</p>
	<p>Designated bins are present on site for office and workshop wastes</p>		<p>Compliant</p>

Reference	Observations	Photograph	Compliance Status
	<p>Designated bins are available for office wastes</p>		<p>Compliant</p>
	<p>Southern boundary of the site landscaped in accordance with the Landscape Management Plan. Landscaped area free of weeds, litter and well maintained</p>		<p>Compliant</p>
	<p>Office facades consistent with the building materials specified in the Approval. Landscaped in accordance with the Landscape Management Plan</p>		<p>Compliant</p>
	<p>Northern boundary, landscaping above the retaining wall was not consistent with the Landscape management plan. Paving on the perimeter road around the manufacturing build undergoing repair due to failure of the pavement.</p>		<p>Non-compliant</p>

OptimE

OptimE Pty Ltd Report:19001005

No:	Revision:	Approved:	Signature	Date:
Rev 0	Final report	M Pignatelli		17/03/2019