

Annual Environmental Management Report - Camellia Materials Recycling Facility 2018-2019



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Terms and Definitions

Term	Definition
AEMR	Annual Environmental Management Report
BMS	Veolia's Business Management Systems
DA	Development Application
DPIE	Department of Planning, Infrastructure and the Environment
EIS	Environmental Impact Statement
EP&A	Environmental Planning and Assessment (Act and Regulations)
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
IEA	Independent Environmental Audit
The Consent	Development Consent SSD 4964
Veolia	Veolia Australia and New Zealand

Executive Summary

This Annual Environmental Management Report (AEMR) 2018-2019 is the second report prepared to detail the environmental performance of activities undertaken at 37 Grand Avenue, Camellia, NSW (the Site). The AEMR covers the period of 7 July 2018 to 6 July 2019 (2018-2019 reporting period).

The Department of Planning, Infrastructure and the Environment (DPIE) (formerly the Department of Planning and Environment) granted Development Consent SSD 4964 (the Consent) on 6 July 2016 for the development of a Material Recycling Facility (MRF) at the Site. The Consent is comprised of conditions (the Consent Conditions) stipulating requirements for construction and operational phases. Veolia Australia and New Zealand (Veolia) has prepared this AEMR in accordance with Part C, Condition 11 of the Consent, as well as relevant legislative requirements and industry best practices.

A description of the activities that were carried out at the Site in the previous reporting period is provided in the AEMR, including Stage 1- Preloading activities on the site, which commenced 13 June 2018 and was completed 19 September 2018. The AEMR also includes a review of the monitoring results and complaint records in relation to the environmental performance of the Site against relevant performance measures and statutory requirements.

An Independent Environmental Audit (IEA), undertaken in accordance with Condition C9 of the Consent, identified two non-compliances against the Consent Conditions during this reporting period which were as follows:

- Condition B7 - Revision 2 of the Stage 1 Water Management Plan (WMP) had not been submitted to the DPIE for approval. Revision 2 has subsequently been submitted to the DPIE.
- The Independent Environmental Audit was not commissioned within 1 year of the issue of Development Consent SSD 4964 or within 1 year of the commencement of Stage 1 preloading works.

These non compliances and proposed corrective actions to comply with Consent Conditions B7 and C9 have been reported to the DPIE. In addition, two non-compliances against the Environment Protection Licence (EPL) were identified in the IEA. Further details are provided in Section 3 of the report.

Section 1 - Introduction

1.1 Site Background

The Site is located at 37 Grand Avenue, Camellia, NSW. Refer to Appendix A for Site Location Plan.

Veolia is currently leasing the Site, with the intention to develop a MRF capable of processing up to 200,000 tonnes per annum of general solid (non-putrescible) waste received from the commercial and industrial sector.

The proposed development involves the construction and operation of a facility to house a multi stage processing system in a new, enclosed building, including a combination of equipment designed to separate incoming waste and extract recyclable material for transfer to secondary markets. There is also the potential to allow for a refuse derived fuel stream for energy recovery.

Veolia is currently implementing a Remedial Action Plan (RAP) which will render the site suitable for commercial / industrial land use. The Site was granted approval for construction and operations of the MRF (SSD 4964) on 6 July 2016 under the Section 89E of the *Environmental Planning and Assessment Act 1979* (the EP&A Act). The Development Consent dictates the construction and operational environmental performance requirements of the Site. As a result a Construction and Environmental Management Plan (CEMP) was prepared to describe controls for construction activities, which was approved by DPIE on 23 May 2017.

The table below summarises the development undertaken during the reporting period associated with the Consent.

Table 1.1 – Development carried out in the reporting period

Works	Approval Authority & Document Reference	Works Completed	Status
Stage 1 - Preloading of the site to improve ground conditions before the construction of MRF	DPIE (SSD 4964)	Movement of preloading material around the site (Phase 2)	Completed July-Aug 2018
		Preloading Settlement period (Phase 2)	Completed Aug 2018

During this reporting period, Select Civil Pty Ltd (Select Civil) was the Principal Contractor (The Contractor) engaged by Veolia, responsible for carrying out the earthworks for preloading of the Site. This work included the placement of material, classified as Virgin Excavated Natural Material (VENM), over the site to raise the levels to the required design height and to allow for geotechnical consolidation of the subsurface layers. Select Civil was responsible for implementing Veolia's management systems for construction activities as detailed in the CEMP for the Site.

As per the CEMP, during the preloading period, Select Civil and / or Veolia personnel were responsible for ensuring environmental controls and mitigation measures were effectively undertaken on-site. To validate this, checklists, registers and forms were completed as records of site inspections. These documents provided a means to evaluate and verify compliance with the relevant regulatory requirements and the contractual environmental requirements.

In the event a non-compliance was identified during site inspections or through monitoring results, an investigation would be carried out to determine the cause and to ascertain the necessary corrective actions. No non-compliances were identified during site inspections this reporting period.

1.2 Legislative Requirements

The main legislative instruments governing the environmental performance and activities undertaken at the Site include the EP&A Act regulated by the DPIE, and the *Protection of the Environment Operations Act 1997* (the POEO Act) regulated by the Environment Protection Authority (EPA), as well as their respective associated regulations. The Consent Conditions pertaining to this AEMR are provided in Table 1.2.

In addition to the Consent, an EPL has been issued by the EPA, under the POEO Act, to regulate the construction activities conducted at the Site.

Table 1.2 - Consent Conditions for the preparation of this AEMR

Relevant Condition	Requirement
<i>PART C – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</i>	
<i>Annual Review</i>	
<p>C11</p>	<p>Within 1 year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development. This review must:</p> <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 the 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.

1.3 Responsibilities

- Environmental inspections on site were undertaken and/or supervised by Select Civil, the Principal Contractor for the preloading phases in accordance with the CEMP
- Environmental inspections on site were undertaken by NSW Resource Recovery technical support personnel – Constance Georgiou (Graduate Environmental Engineer) and Sara Maddison (Operations Project Manager) during the reporting period

Section 2 - Environmental Monitoring & Management

2.1 Monitoring Requirements

The following sections detail the monitoring undertaken throughout the reporting period in accordance with the requirements of the Consent.

Environmental Monitoring Program within the Construction Environmental Management Plan (CEMP) provides details on all monitoring requirements of the Consent and other appropriate regulations for the Stage 1- Preloading works, to measure and assess the effectiveness of on-site environmental management measures during the preloading period on the Site.

Table 2.1 Construction Monitoring Requirements

Condition Ref	Type of Monitoring	Frequency	Commentary
Part B, Condition B18	Traffic Spot Monitoring	As required	Ongoing basis
CEMP	Visual Dust Monitoring	Weekly or as required	Ongoing basis
Part B, Condition B24	Noise Monitoring	At the commencement of the project followed by as required	Background Noise monitoring completed last reporting period
Part B, Condition B26	Vibration Monitoring (Vibratory Rollers)	At the commencement of the activity using Rollers	Not triggered

Water Management Plan	Inspection of Water Management System	Weekly during construction activities on site	Ongoing basis
Water Management Plan	Inspection of Sediment and Erosion Controls	Monthly and following all rainfall of greater than 29.5mm over a five-day period	Ongoing basis
Water Management Plan	Stormwater Quality Monitoring	During event of basin overflow and as required	Not triggered

2.1.1 Meteorology

Monitoring meteorological data during this reporting period provided an understanding of the ambient air quality and rainfall conditions at the Site, which was utilised to manage environmental performance, as well as investigate potential impact to nearby sensitive receivers.

Meteorological data is downloaded from the public weather station situated at the Bureau of Meteorology (BoM) Parramatta North (Masons Drive) (Station ID: 066124), provided in recorded at 15 minute intervals. During the reporting period, meteorological conditions such as wind speed, wind direction and rainfall were monitored on an ongoing basis and/or in the event a noise or dust complaint was received.

A summary of daily wind speeds and wind directions at 9am at the nearby BoM weather station is presented in Figure 2.1 and Figure 2.2. During the reporting period the 9am prevailing wind directions were westerly and north-westerly and the wind speeds were most frequently between 1 – 10 m/s.

Figure 2.1 Distribution of 9AM wind direction data during the reporting period

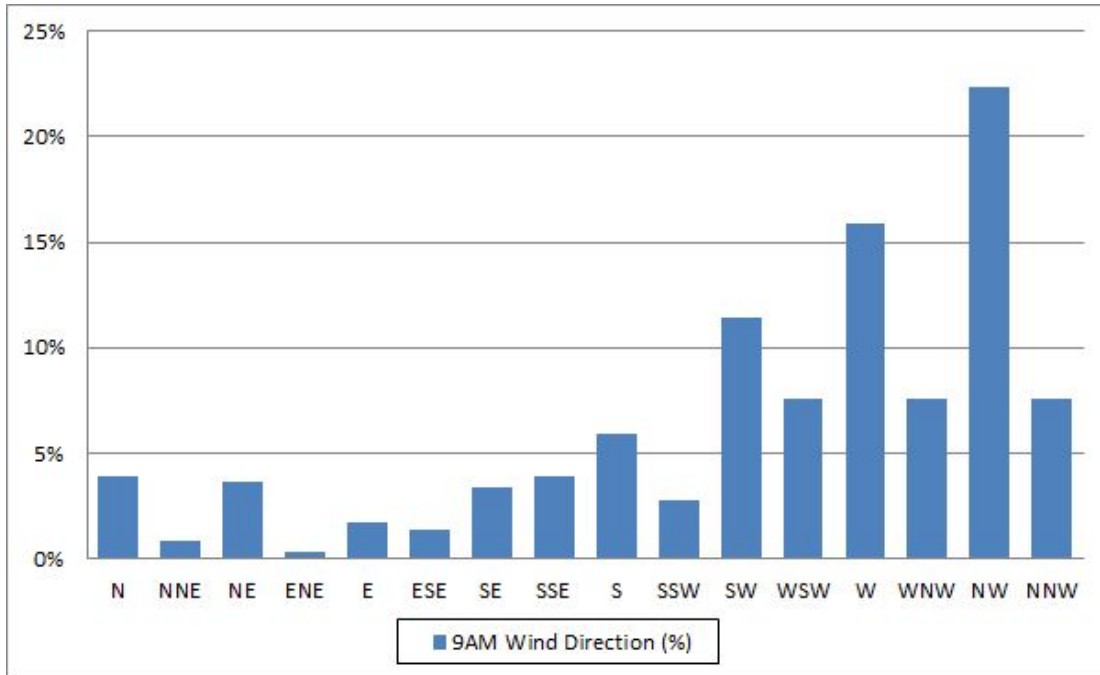
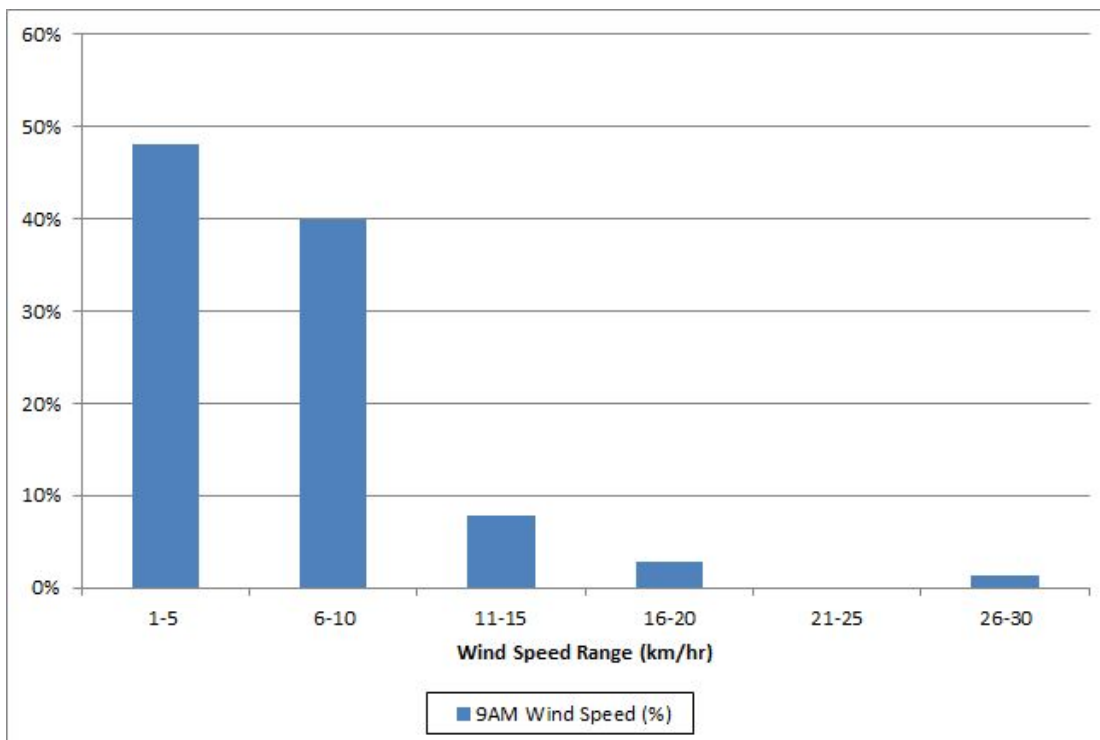


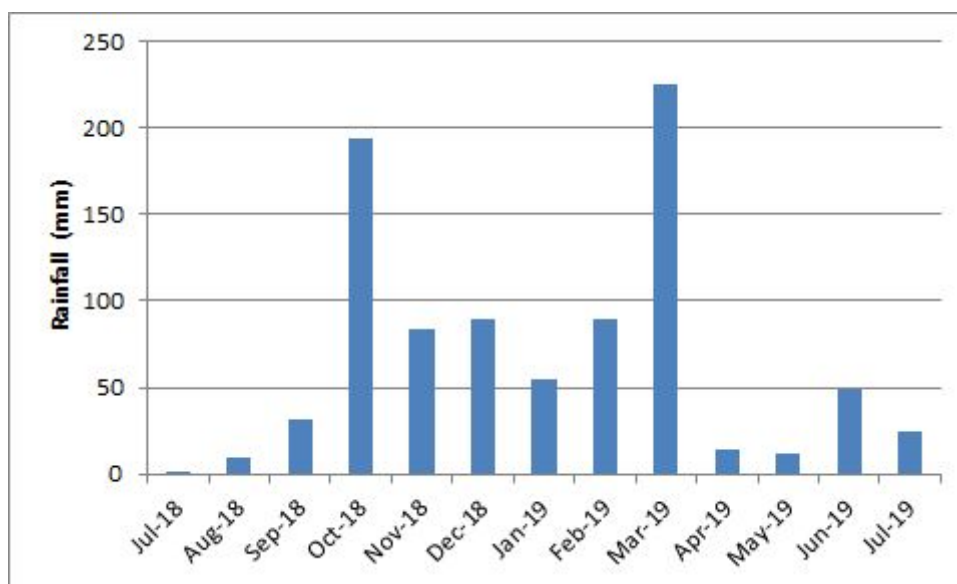
Figure 2.2 Distribution of 9AM wind speed data during the reporting period



Ongoing rainfall data was monitored to supplement stormwater system operation and discharge, as well as for general housekeeping management such as inspection and maintenance of sediment and erosion control measures.

A summary of rainfall data at the Site during the reporting period is presented in Figure 2.3. Overall, the average rainfall for the Site during the reporting period was approximately 67.5mm per month.

Figure 2.3 Monthly rainfall data during the reporting period



2.2 Air Quality

Air quality monitoring in accordance with the Consent, was carried out as required to determine whether preloading activities conducted at the Site impacted ambient air quality. Preloading activities were undertaken on-site over a period of two months, the remainder of the time the Site was in settlement period where no activity was occurring on-site. Further details regarding air quality monitoring and management practices undertaken at the Site are provided in the following sections.

2.2.1 Dust

The Environmental Impact Statement (CH2MHILL, 2013), predicted air quality impacts during the construction phase of the Site that activities associated with preloading and levelling of the site, with imported fill material, would have the potential to generate dust emissions. However it was expected that this would be localised to the construction zone along the embankment.

During the construction works associated with preloading the site, contractors maintained dust mitigation measures to minimise airborne dust generation and subsequent impact on neighbouring sites and workers. During the loading of the site with preload material water trucks were used for dust suppression. Immediately following the placement of material, the Contractors were responsible for installing of a geofabric layer (bidim) keyed onto the surface of the preloaded material to control dust.

Weekly site inspection checklists were used during the construction activities to assess the effectiveness of control measures. Following the completion of on-site activities for Stage 1 - Preloading, the weekly site inspections were reduced to monthly checks based on reduced site activities.

One dust complaint was received during the reporting period, refer to Section 3.3 for further details.

2.2.2 Exhaust Emissions

Exhaust emissions, such as diesel exhaust from construction traffic and machinery, had the potential to temporarily impact on local air quality during preloading activities. In the EIS, it was predicted that given the relatively low number of vehicles and machinery expected during the preloading stage compared to existing traffic at the Camellia industrial area, exhaust emissions are unlikely to cause significant impacts on the local and regional air quality.

As per the CEMP, in order to minimise exhaust emissions during construction activities, the following air quality mitigation measures were in place during the reporting period;

- Vehicle and machinery exhaust systems were serviced and maintained by Contractors
- Contractors were responsible for carrying out inspections of machinery through daily pre-start checklists.

No complaints relating to exhaust emissions were received during the reporting period.

2.3 Noise and Vibration

During pre-loading works, construction and traffic noise and vibration activities had the potential to generate nuisance noise and vibration emissions.

2.3.1 Noise

As part of the Environmental Impact Statement (EIS), a noise assessment was conducted by Bridges Acoustics Pty Ltd to assess the predicted construction and traffic noise levels generated as a result of the preloading works. Given the industrial nature of the area, the neighbouring properties were considered not likely to be sensitive to environmental noise. The nearest sensitive noise receivers were the residences located in and around John Street, Rydalmere (approximately 230 m from the Site). Based on the assessment no exceedance in noise impact above background levels was anticipated to occur as a result of construction noise emissions at the Site.

As per the CEMP, in order to minimise noise impacts of construction activities, the following noise and vibration mitigation measures were in place during the reporting period;

- Site speed limit of 20 km/hr enforced by the Contractor to avoid unnecessary noise due to fast engine speeds
- Machinery were fitted with squashed duck reversing alarms as opposed to reversing beepers. In addition all machinery and vehicles were fitted with flashing lights.
- Contractor carried out maintenance and servicing of machinery to ensure all machines used on the Site were maintained in working order, with particular emphasis on exhaust silencers, covers on engines and transmissions, and squeaking or rattling components.
- Daily pre-start checks were performed on all machinery to ensure that the plant are in good order for operation.
- Construction activities were restricted to the construction hours specified below in Table 2.1.

Table 2.1 - Construction Hours of Operation

Activity	Day	Hours
Construction	Monday - Friday	7:00am-6:00pm
	Saturday	8:00am-1:00pm
	Sunday & Public Holidays	Nil

Prior to the commencement of Stage 1 preloading works in the previous reporting period, SLR Consulting were engaged to conduct an unattended background noise survey at the two closest noise sensitive receivers. In the event a noise complaint is received, this data would assist in the investigation of potential noise impacts from the preloading activities. In the event of levels above the set limits for noise, a review of construction activities, plant and equipment will be undertaken to resolve the issue.

There were no noise complaints received from either industrial or residential neighbours during the 2018-2019 reporting period therefore no additional noise monitoring was undertaken.

2.3.2 Vibration

The Construction Vibration criterion was developed in accordance with the EPA's Assessing Vibration: Technical Guideline (NSW EPA, 2006) at residential receivers which outlines that the continuous or impulsive vibration not to exceed the criteria in Table 2.2.

Table 2.2 - Vibration Performance Criteria

		Preferred Values		Maximum Values	
Location	Assessment Period	Z axis	X and y axis	Z axis	X and y axis
Continuous vibration					
Critical areas ²	Day-or night-time	0.0050	0.0036	0.010	0.0072
Residences	Daytime	0.010	0.0071	0.020	0.014
	Night-time	0.007	0.005	0.014	0.010
Impulsive vibration					
Critical areas ²	Day-or night-time	0.0050	0.0036	0.010	0.0072
Residences	Daytime	0.30	0.21	0.60	0.42
	Night-time	0.10	0.071	0.20	0.14

Note: Daytime is 7.00am to 10:00pm and night-time is 10:00pm to 7:00am.

During preloading, ground vibration may be caused by compaction but was assessed in the EIS to be negligible and to pose no potential impact on sensitive receivers. Given no vibratory rollers were used during compaction, no vibration monitoring was required to be completed.

In addition, no vibration complaints were received from either industrial or residential neighbours during the 2018-2019 reporting period.

2.4 Surface Water

During the pre-loading works, site runoff was managed through a temporary water management system, as per the Water Management Plan (WMP) (Consult.In, 2018) which is appended to the CEMP. The front portion of the site was bunded to hold stormwater which was then discharged as pumped flow through to the Site's outlet and into Parramatta River.

The temporary water management system also includes the use of erosion and sediment controls to minimise sediment runoff into waterways. These controls include sandbags, sediment fencing around the base of the slopes and emplacement of a geotextile layer (bidim) across the entire site over the engineered fill.

During construction, the contractor was responsible for undertaking inspections of water management systems (including sediment and erosion controls) which were documented in site inspection checklists. During the settlement period, visual monitoring of the key components of the temporary water management system was done on a routine basis, including inspections of sediment and erosion controls, pump and sediment within the sump area. No issues were noted during this reporting period.

The efficacy of these measures was assessed against the performance criteria given in the table below.

Table 2.3 - Surface Water Performance Criteria

Monitoring Point	Parameter	Performance Criteria	Reference
Pit P2 (sump)	Total Suspended Solids	50 mg/L	Water Management Plan

As per the WMP, in the event the sediment basin at the southern end of the site is found to be overflowing, two consecutive samples of the basin outlet water must be collected to verify performance of erosion and sediment control measures against the performance criteria in Table 2.3. During the reporting period, no basin overflow events occurred therefore no water samples were required to be collected from the basin.

2.5 Traffic

A traffic impact statement (TIS) was undertaken as part of the EIS to assess the potential impact of the Site on traffic during the construction of the development. It was found that the Site would see variations in the daily construction vehicle generation during each construction activity conducted during preloading (as per Table 2.4) therefore construction traffic may have temporary noise impacts and has the potential to cause minor congestion/traffic disruptions in the surrounding areas.

Table 2.4 - Anticipated truck movements during Preloading Activities

Construction Activities	Anticipated truck movements per day	Indicative Timing
Preloading of the Site	60 truck movements/ day	over a 3-week period
Settlement Period	N/A	over a period of approximately 12 months
Removal of the excess material	5-10 truck movements/ day	over a period of 1 week

During the reporting a total of 132 vehicle (truck) movements occurred between 19 - 31 November 2019 when excess preload material was being removed from the Site. During this period, a number of mitigation measures were implemented at the Site to manage potential traffic impacts as detailed in the CEMP including;

- Daily 2 way radio communication with drivers at the entry to update drivers, with any recent changes to procedures and to manage traffic
- A Traffic Management Plan was implemented on-site during construction works. The Traffic Management Plan was continually updated in line with the tipping plan, which was communicated through Site inductions and toolbox talks.
- On-site parking used for construction traffic parking and deliveries away from the immediate construction zone in order to avoid congestion

The implemented traffic control measures on site assisted with the effective management of traffic flow. No traffic congestion or impacts to locality were noted and no complaints were received during the reporting period.

2.6 Soil

In accordance with Condition B15 of the Consent, all fill material used for preloading of the site was classified as Virgin Excavated Natural Material (VENM).

The imported fill material was sourced from WestConnex stage 1B tunnel spoil which had been granted with an EPA Resource Recovery exemption (WestConnex Stage 1B Tunnel Spoil Exemption 2016), and order (WestConnex Stage 1B Tunnel Spoil Order 2016) allowing the material to be used as engineered fill in earthworks.

During the reporting period, as part of the regrading of the site, 4381 tonnes of excess cut material classified as Select Fill was removed from the site for use as ground improvement material for construction purposes at a licenced waste facility.

Soil and erosion control measures as described in Section 2-4 were implemented on-site.

2.8 Heritage

No excavation works were conducted therefore items of indigenous heritage were encountered during the reporting period.

2.9 Pest and Vermin noxious weeds

During the reporting period, visual inspections for pests and vermin were undertaken at the Site. For this AEMR period, no pest and vermin management issues were reported.

Weed management was undertaken in the reporting period as part of the site maintenance works to minimise weed establishment and invasions including clearing of vegetation to minimise weed infestation.

Section 3 - Environmental Performance

The environmental performance of the Terminal is assessed through the results of environmental monitoring, internal inspections, as well as external and internal environmental audits.

3.1 Previous Findings and Corrective Actions

In the previous AEMR it was determined that during the 2017-2018 reporting period there were no non-compliances identified against the Consent Conditions.

3.2 Current Findings and Corrective Actions

In accordance with Schedule 4 condition 6 of the Consent, Veolia commissioned an Independent Environmental Audit (IEA) for the Terminal. Veolia engaged Jackson Environment and Consulting (JEC), on approval from DPIE, to conduct the IEA.

This is the first IEA under this Consent. The audit period was from the issue of Development Consent SSD 4964 on 6 July 2016, and included the period covered by the first Annual Environmental Management Report (AEMR) for the development (July 2017 to July 2018).

The Auditors assessed the development to be generally compliant with the conditions of the Consent. Two non-compliances were identified against the Consent, which were considered to be of an administrative nature. The two non-compliances identified are provided in Table 3.1 below along with corrective actions implemented. Management systems and environmental performance of the development are considered to be adequate for the stage of development.

Table 3.1 - Non-compliances and corrective actions in the 2018/2019 reporting period

Relevant Condition	Non-compliance	Corrective Actions	Person/Team Responsible	Status
Condition B7	Revisions of the Stage 1 Water Management Plan (WMP) have not been submitted to the DPIE for approval.	<p>The only revisions to the WMP were minor changes to phases of preloading, procedures and drawings to reflect settlement results. These revisions are consistent with the previous version and did not change the water management philosophy for the site.</p> <p>Veolia has subsequently submitted the revised WMP to DPIE for approval.</p>	NSW Resource Recovery - Environmental Planner	Completed - 19 Dec 2018
Condition C9	The Independent Environmental Audit was not commissioned within 1 year of the commencement of Stage 1 preloading works.	<p>Veolia had previously advised DPIE (both in 2017 and 2018) why the IEA was not commissioned within the first year - as no construction or operational activities had been carried out at the Development. Veolia had requested an extension, which the DPIE had agreed to.</p> <p>This non-compliance was rectified by commissioning of this Audit and that the DPIE has been kept informed of the timing. No recommendation on further corrective action is made.</p>	NSW Resource Recovery - Environmental Planner	Completed

<p>EPL 4806 Condition O4.1</p>	<p>Recommendation to update the Pollution Incident Response Management Plan (PIRMP) to meet all the requirements under the legislation.</p>	<p>Veolia will be reviewing the CEMP and Flooding Emergency Response Plan (ERP) to ensure consistent referencing with the Pollution Incident Response Management Manual and PIRMP are addressed.</p>	<p>NSW SHEQ - Systems and Assurance Manager</p>	<p>In Progress - Currently the Flooding ERP is under development in consultation with Parramatta Council</p>
<p>EPL 4806 Condition G1.1</p>	<p>A copy of EPL 4806 was not kept at the site although there are currently no buildings at the site and site is unattended.</p>	<p>There is currently no infrastructure at the Development (other than storage tanks and a shipping container), documentation relating to the premises is kept at the NSW State Office, which is in the adjacent suburb of Rosehill.</p> <p>A copy of the EPL was placed in the storage container on site to satisfy the requirement of the licence.</p>	<p>NSW Resource Recovery - Graduate Environmental Engineer</p>	<p>Completed</p>

3.3 Complaints

Following the receipt of a complaint:

1. Any complaints, queries and issues received regarding noise, dust or other general community disturbances are documented individually in the Site's Complaints Register
2. Meteorological wind data is downloaded from the BoM website
3. All complaints are investigated and details recorded and actioned as per Veolia's incident management processes

4. The Site Manager or nominee communicates any corrective actions taken on the site with the complainant

One complaint was received by the Site during this reporting period, received directly from the neighbouring business. Broken sandbags placed were identified as a source of dust, therefore additional bidim was applied across the site to cover the broken sandbags and reduce potential dust emissions.

3.4 Conclusion

A review of the environmental performance of the Site during the last reporting period determined the site was generally managed in accordance the Consent. Veolia will continue to monitor and assess the Site's environmental performance through to the next reporting period, as well as report on the progress of closing out of corrective actions and recommendations from the IEA.

References

1. CH2M HILL (2013) Camellia Recycling Centre: Environmental Assessment. CH2M HILL Australia Pty Ltd. February 2013.
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3. EPA (2006). Assessing Vibration: Technical Guideline. NSW Environmental Protection Authority. February 2006.
4. Veolia (2016). Construction and Environmental Management Plan (CEMP) – Preloading Stage. Veolia Australia and New Zealand. November 2016.
5. Veolia (2018) Camellia Materials Recycling Facility - Annual Environmental Management Report (AEMR). Veolia Australia and New Zealand. September 2018.

Appendices

Appendix A - Site Plan



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NRG Automotive Repairs

Charles Quay - Parzanette

Parzanette - Charles Quay

Concrete Recyclers

Veolia Environmental Services

Grand Ave

SAMI Bitumen Technologies

Grand Ave

Hymix Concrete