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Veolia Environmental Services (Australia) Pty Ltd

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Ramboll Australia Pty Ltd

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INDEPENDENT ENVIRONMENTAL AUDIT

WOODLAWN BIOREACTOR AND CRISPS CREEK INTERMODAL FACILITY

INDEPENDENT ENVIRONMENTAL AUDIT

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Checked by **Victoria Sedwick**
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1. EXECUTIVE SUMMARY

Veolia Environmental Services (Australia) Pty Ltd (Veolia) engaged Ramboll Australia Pty Ltd (Ramboll) to conduct an Independent Environmental Audit (IEA, or the Audit) of the Woodlawn Bioreactor (Bioreactor) and Crisps Creek Intermodal Facility (IMF).

The Bioreactor is located within the Woodlawn Eco-Precinct, located off Collector Road, approximately 10 km southwest of the Village of Tarago. The IMF is located approximately 8 km east of the Bioreactor and 2 km south of Tarago.

The Audit is required under Condition 6 of Schedule 7 of the Project Approval (PA) 10_0012 and Condition 19 of Development Consent (DC) 31-02-99.

The objective of the Audit was to independently and objectively assess the environmental performance and compliance status of the Bioreactor and IMF sites under PA 10_0012 and DC 31-02-99, as well as the two sites' Environment Protection Licences (EPLs), EPL 11436 and EPL 11455, respectively. The Audit Period was from the date of the 2018 IEA site visit on 12 March 2018 to the date of this Audit site visit on 17 March 2021.

The Auditors consider that overall environmental practices for the site are generally adequate with evidence of improvements in environmental performance including the commissioning and operation of the Leachate Management Plant (LTP), lining of evaporation dams and improvements to the landfill gas extraction system, mechanical evaporation systems and process control systems. The Auditors note that more than 50 additional conditions were triggered during this Audit due to construction of the LTP and works on evaporation dams, that required auditing, compared to the 2018 IEA.

There were seventeen (17) non-compliances during the Audit Period of which eleven (11) are considered to be administrative in nature. The non-compliances are summarised as follows.

PA 10_0012:

- NC1, Schedule 3, Condition 5 – The limit for maximum waste input rates at the Landfill for waste received as residual waste from Veolia's Mechanical Biological Treatment (MBT) facility was exceeded in the 2019 and 2020 Annual Environmental Management Report (AEMR) reporting periods, as a result of regulatory instruction with regards to Mixed Waste Organic Outputs (MWOO).
The NSW Government Department of Planning, Environment and Industry (the Department, or DPIE) approved an increase in the limit for putrescible regional waste received by road from 90,000 tonnes per annum (tpa) to 125,000 tpa, subject to further consultation with Goulburn Mulwaree Council (GMC) to determine if a climbing lane was required for Tarago Road, and if required, the climbing lane was to be constructed to the satisfaction of GMC prior to the increase in acceptance of regional waste. Veolia consulted GMC and GMC requested that the 2013 traffic assessment be updated by 30/11/19. The traffic assessment was updated and a draft report issued in March 2021. Based on data reported in the AEMRs, Veolia accepted more than 90,000 tpa regional waste by road in 2019 and 2020 prior to determining that the climbing lane was not required to the satisfaction of GMC.
The Auditors recommend that Veolia confirm the quantities of putrescible regional waste received by the Bioreactor during the 2019 and 2020 reporting periods to determine if the approved limit of 90,000 tpa was exceeded. The Auditors recommend that Veolia investigate the causes for the confirmed limit exceedances and undertake appropriate corrective actions to prevent a recurrence. The Auditors recommend that Veolia confirm that GMC accept ARRB's advice that the climbing lane is not considered necessary.
- NC2, Schedule 3, Condition 9 – The LTP was occupied prior to the issue of an occupation certificate (07/04/2021). No recommendation is provided as the Occupation Certificate for the LTP has been issued.

- NC3, Schedule 4, Condition 18D – Veolia transferred ~50 ML stormwater from Evaporation Dam (ED) ED3S to ED2 during the Audit Period. There is no evidence available to the Auditors that the seepage or leakage points identified in ED2 have been repaired to the satisfaction of the Department and the NSW Environment Protection Authority (EPA) prior to the transfer of any stormwater from ED3S to ED2. The Auditors recommend that prior to transferring anymore stormwater from ED3S to ED2, Veolia should establish that the leakage points in ED2 have been identified and repaired to the satisfaction of the Planning Secretary and EPA.
- NC4, Schedule 4, Condition 18E – The LTP was commissioned on 04/10/2018, which was four days after the stipulated completion date of 30/09/18. No recommendation is required as the LTP is operational.
- NC5, Schedule 4, Condition 18M – There is no evidence that quarterly updates have been submitted to Water NSW or the Department in accordance with this Condition. The Auditors recommend that quarterly reports be provided to the EPA, Water NSW and the Department of the leachate volume in the ED1 Coffey Dam and the remaining leachate storage volume.
- NC6, Schedule 5, Condition 20 – This non-compliance continued from the previous IEA through to November 2020 when the Tarago Loop Extension works were completed and the train was no longer required to be split in two. No recommendation is required as the non-compliance has been addressed.
- NC7, Schedule 6, Condition 4 – The Transport Code of Conduct was last issued in 2011 and was not updated in consultation Roads and Maritime Services (RMS), GMC, Palerang Council (now the Queanbeyan-Palerang Regional Council (QPRC)) and the Community Liaison Committee to the satisfaction of the Department prior to the receipt of more than 50,000 tpa of regional waste. The Auditors recommend that Veolia's Transport Code of Conduct be updated in consultation RMS, GMC, Palerang Council and the Community Liaison Committee, and to the satisfaction of the Department.
- NC8, Schedule 7, Condition 7 – Four complaints received between 19/04/2018 and 26/05/2018 were not published on the website within seven days of a complaint being made. No recommendation is required as the non-compliance has been addressed.
- NC9, Schedule 7, Condition 8 – Waste volume limits were exceeded during the Audit Period, which represent an 'incident', as defined in PA 10_0012, Schedule 2, Definitions. The waste volume limit exceedances were not notified and reported to the Department within the required timeframes. The Auditors recommend that Veolia conduct an investigation as to why the Department was not notified of these exceedances (e.g. failure to identify the waste volume limit exceedances as an 'exceedance' and/or an 'incident', failure to understand this Condition, this requirement not specified in a procedure?) and based on the investigation findings carry out appropriate corrective action(s) to prevent a recurrence.
- NC10, Schedule 7, Condition 9 – The Soil and Water Management Plan (SWMP) was not reviewed and updated following the Leachate and Water Management System (LWMS) Audit and revision of the water balance in 2020, and changes to the stormwater system. Other aspects of the SWMP may be out of date as the sampling and transfer point for the stormwater in the void may have changed from Pond 3 to Pond 5 in 2019 (refer to DC 31-02-99, Condition 65). The Auditors recommend that the Landfill Environmental Management Plan (LEMP) and its sub-plans, particularly the SWMP, be reviewed and revised, as appropriate, which we understand Veolia is already in the process of doing. Veolia should consider the EPA's previous comments in relation to the SWMP and LMP (16/08/2018).

DC 31-02-99:

- NC11, Condition 18 – A Compliance Report has not been issued for more than two years. The Auditors recommend that Veolia contact the Department to seek advice on whether a Compliance Report is required retrospectively. Veolia could also seek advice on

whether this Condition can be modified. Depending on the Department's requirement, Veolia should consider how to ensure that future Compliance Reports are not missed.

- NC12, Condition 70A – Quarterly updates to the EPA and DPIE of the leachate volume in ED3SS and remaining volume were not available. The Auditors recommend that Veolia provide quarterly updates to the EPA and DPIE.

EPL 11436:

- NC13, Condition O6.17 – The Total Volatile Organic Compounds (VOCs) measured at the (Landfill Gas) LFG Inlet (Point 5) and the Engine 1 Exhaust Stack (EPA Point 8) were 56 g/min and 1.8 g/min, respectively, resulting in a calculated destruction efficiency of 96.8% for Engine 1, which is less than the required minimum destruction efficiency of 98%. The Auditors recommend that future gas engine emission test reports, report the calculated destruction efficiency correctly and that Veolia report potential non-compliances as required under the EPL.
- NC14, Condition O6.31 – The progress report on the Alternative Daily Cover (ADC) trial was not provided to the EPA within the required 90-day timeframe. No recommendation is required as the alternative daily cover trial progress report was issued.
- NC15, Condition M8.1 – The mechanical evaporator log was not maintained in accordance with this Condition up to late 2020 / early 2021 before a continuous monitoring system was implemented. No recommendation is required as a continuous monitoring system of the mechanical evaporators has been implemented.
- NC16, Condition R4.2 – Three odour complaint reports were not provided to the EPA within the required 24-hour timeframe. The Auditors recommend Veolia review the complaints response process and consider appropriate corrective actions to ensure that the 24-hour report requirement is met on an ongoing basis.
- NC17, Condition U1.2 – Whilst the LTP has been designed to continuously treat at least 4 L/s of leachate and therefore, should be capable of doing so, the LTP has yet to achieve the minimum rate. The Auditors recommend that Veolia continue to optimise the LTP performance to achieve the required minimum 4 L/s leachate treatment rate.

The Auditors consider management of the site operations by Veolia to continue to be of a generally good standard. Based on consultation, it is considered that stakeholder engagement could be improved. Twenty-seven opportunities for improvement have been identified for which we provide twenty-six recommendations.

2. INTRODUCTION

2.1 Background

Veolia Environmental Services (Australia) Pty Ltd (Veolia) engaged Ramboll Australia Pty Ltd (Ramboll) to conduct an Independent Environmental Audit (the Audit) of the Woodlawn Bioreactor (Bioreactor) and Crisps Creek Intermodal Facility (IMF).

The Audit relates to two sites: the Bioreactor and the IMF. The Bioreactor is located within the Woodlawn Eco-Precinct, located off Collector Road, approximately 10 km southwest of the Village of Tarago. The Bioreactor site has a total area of approximately 300 hectares (ha), with the Bioreactor occupying the void of the previously operating open cut mine (Woodlawn mine).

The IMF is located approximately 8 km east of the Bioreactor and 2 km south of Tarago. Containerised general solid putrescible waste is transported by rail to the IMF from Veolia's Clyde Transfer Terminal and Banksmeadow Transfer Terminal. Two trains depart Sydney daily (Monday to Saturday). The first train arrives at the IMF at approximately 6.30am and containers are unloaded and transferred to trucks for transfer to the Bioreactor. The second train arrives at the IMF at approximately 2:30pm. Trucks are weighed at the Bioreactor weighbridge and container numbers recorded, before processing to the active tipping face within the Bioreactor. Waste is unloaded to the active tipping face and compactors are used to spread and compact the waste. Waste is also received by road from regional customers.

The Bioreactor is currently approved to receive 900,000 tonnes per annum (tpa) of waste by rail from Sydney and 125,000 tpa of regional waste by road. A further 100,000 tpa of residual waste can be received from Veolia's Mechanical Biological Treatment (MBT) facility, previously referred to as the Alternative Waste Treatment (AWT) facility, which is also located in the Woodlawn Eco-Precinct.

The Audit is required under Condition 6 of Schedule 7 of the Project Approval (PA) 10_0012 and Condition 19 of Development Consent (DC) 31-02-99.

2.2 Audit objective and scope

The objective of the Audit was to assess the environmental performance of the Bioreactor and IMF sites, for the period since the last Independent Environmental Audit (IEA), conducted on 12 March 2018 to the date of this Audit site visit, 17 March 2021, against PA 10_0012 and DC 31-02-99.

Condition 6, Schedule 7 of PA 10_0012 requires the Audit to consider the sites' Environment Protection Licences (EPL 11436 and EPL 11455), as follows:

Every three (3) years after the first Independent Odour Audit required under condition 7 of schedule 4 of this approval, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the Project. This audit must:

- a) be conducted by a suitably qualified, experienced, and independent team of experts, including both traffic and odour experts, whose appointment has been endorsed by the Director-General;*
- b) incorporate and consider the findings/mandatory recommendations of any Independent Odour Audit required by this approval.*
- c) assess the environmental performance of the Project, and its effects on the surrounding environment;*
- d) assess whether the Project is complying with the relevant standards, performance measures, and statutory requirements;*
- e) review the adequacy of any strategy/plan/program required under this approval; and, if necessary,*

f) recommend measures or actions to improve the environmental performance of the Project, and/or any strategy/plan/program required under this approval.

Condition 19, Schedule 2 of Development Consent 31-02-99 imposes a similar requirement, as follows:

19. Every three years following the date of this consent, or at periods otherwise agreed to by the Secretary, and until such time as agreed to by the Secretary, the Applicant shall arrange for an independent audit of the environmental performance of the development. The audits shall:

(a) be conducted pursuant to ISO 14010 – Guidelines and General Principles for Environmental Auditing, ISO 14011 – Procedures for Environmental Auditing and any specifications of the Secretary;

(b) be conducted by a suitably qualified and independent person approved by the Secretary;

(c) assess compliance with the requirements of this consent;

(d) assess the implementation of the LEMPs and review the effectiveness of the environmental management of the development; and

(e) be carried out at the Applicant's expense.

The audits shall be submitted to the Secretary, the EPA, DPI Water, Water NSW, Council and the Community Liaison Committee.

The Applicants shall comply with all reasonable requirements of the Secretary in respect of any measures arising from or recommended by the audits and within such time as agreed to be the Secretary.

2.3 Exclusions

The MBT facility commenced operation in March 2017. Project Approval 06_0239 and EPL 20476 for the MBT were not reviewed as part of this Audit.

2.4 Audit Team

The Audit Team comprised Victoria Sedwick (Exemplar Global certified Lead Auditor); Emily Rowe (Exemplar Global certified Lead Auditor); and Vanessa White, with specialist input, as required, by David Ford (previous audit), Shaun Taylor (traffic) and Greer Laing (odour). The Audit Report was prepared by Emily Rowe and Vanessa White in consultation with David Ford and Greer Laing; and reviewed by Victoria Sedwick.

2.5 Audit Period

The Audit Period was from the date of the 2018 IEA site visit on 12 March 2018 to the date of this site visit on 17 March 2021.

3. AUDIT METHODOLOGY

3.1 Selection and Endorsement of Audit Team

All of the Ramboll Auditors referred to in Section 2.4 have training and extensive experience in conducting environmental compliance audits and are independent from Veolia. Emily Rowe is a certified Lead Auditor with Exemplar Global (Certificate No. 204997) and Victoria Sedwick is a certified Lead Auditor with Exemplar Global (Certificate No.13180). Under the Conditions of Consent, endorsement of the Audit Team by DPIE was required and approved in writing by DPIE in a letter to Veolia dated 5 February 2021 (**Appendix E**).

3.2 Independent Audit Scope Development

The scope for the Audit was developed to assess the development's environmental performance in relation to the Development Consent / Project Approval conditions of DC 31-02-99 and PA 10_0012. At the time of this Audit, it is understood that there have been three modifications of DC 31-02-99 (11/08/10, 09/09/16 and 22/12/17) and four modifications to PA 10_0012 (09/09/16, 22/12/17, 09/04/19 and 16/03/20). None of the subsequent approvals (and modifications) appear to require the surrender of the older development approvals. As such Ramboll has assumed that the IEA would assess compliance with the aforementioned approvals, as modified.

Condition 19, Schedule 7, DC 31-02-99 requires that the IEA be conducted pursuant to *ISO 14010 – Guidelines and General Principles for Environmental Auditing*, *ISO 14011 – Procedures for Environmental Auditing* and any specifications of the Secretary. DPIE have since issued the Independent Audit Post Approval Requirements (IAPAR) (DPIE, 2020). DPIE also requested in consultation that the audit be conducted consistent with *ISO 19011:2002 – Guidelines for Quality and/or Environmental Systems Auditing* and consistent with IAPAR (DPIE, 2020). Hence, the IEA was conducted in accordance with IAPAR (Department, 2020), to the extent practicable, as well as ISO 14010, ISO 14011, ISO 19011 with particular regard to:

- Conduct and completion of the IEA in accordance with IAPAR requirements for an Independent Audit Methodology;
- Preparation of Independent Audit Reports in accordance with IAPAR requirements for an Independent Audit Report; and
- Allowing for pre-site audit documentation review, opening meeting, site audit, closing meeting and post-site audit documentation review and follow up.

3.3 Compliance Evaluation

The following forms of evidence were gathered during the conduct of the Audit:

- Site inspection of the Bioreactor and IMF facilities on 17 March 2021, which included the taking of photographs;
- Review of documents, reports and other records including approvals, reports prepared to satisfy the conditions, site inspection checklists, site photographs, site plans and drawings, as well as Veolia's correspondence with agencies including the DPIE;
- Interviews of site personnel (refer Section 3.4);
- Calling the 24-hour complaints line telephone number;
- Review of documents posted on the internet including Veolia and DPIE websites.

3.4 Site Inspection and Interviews

The Bioreactor and IMF facilities were inspected by the Auditors on 17 March 2021. The following personnel were interviewed during the site visit and accompanied the Auditors during the site inspection:

- Marea Rakete, Woodlawn Environmental Officer
- Tobias Stanley, Bioreactor and WBE Manager

- Ramona Bachu, National Environmental Compliance Manager
- Anae Ressos, Environmental Coordinator
- Renee Oosting, Bioreactor Operations Manager
- Callum Simpson, Leachate Treatment Plant Supervisor
- Sureka Wathanage, Bioenergy (WBE) Operations Manager
- Ark Du, Bioreactor Engineer

3.5 Consultation

Under the Conditions of Consent, formal consultation was not required. However, consultation was conducted in accordance with the IAPAR (DPIE, 2020) and the following authorities were consulted as shown in Table 1.

Table 1 – Consultation with Authorities

Authority	Contact Details	Comment
DPIE	Bruce Zhang, Senior Environmental Assessment Officer, Bruce.Zhang@planning.nsw.gov.au (contact details provided by Veolia) DPIE Planning Portal	Email sent 16/03/21. No response received. Letter requesting consultation submitted by Veolia via Planning Portal on 26/03/21. Letter response, dated 12/04/21 received from Veolia on 12/04/21. Refer to Table 2 for DPIE comments and the Auditors' response.
EPA	Nick Feneley, Senior Operations Officer, 0475 823 299 (contact details provided by Veolia)	Text message sent on 16/03/21 requesting consultation. Return text message received and phone call on 17/03/21. Refer to Table 3 for DPIE comments and the Auditors' response.
Water NSW	Mr Jim Caddy, Catchment Assessments Officer (Goulburn), James.Caddey@waterNSW.com.au (contact details provided by Veolia)	Phone call and email/letter requesting consultation sent on 14/04/21. Return email received on 14/04/21. Refer to Table 4 for DPIE comments and the Auditors' response.
Goulburn Mulwaree Council	Scott Martin, scott.martin@goulburn.nsw.gov.au	Email/letter requesting consultation sent on 14/04/21. Return email received on 14/04/21. Goulburn Mulwaree Council had no issues to raise for the IEA.

Authority	Contact Details	Comment
Queanbeyan-Palerang Regional Council	Phil Hansen, phil.hansen@qprc.nsw.gov.au, (contact details provided by Veolia) Derek Tooth, derek.tooth@qprc.nsw.gov.au	Email/letter requesting consultation sent on 14/04/21. As Phil Hansen was on leave, a follow-up phone call and email/letter was sent to Derek Tooth. No response received.
DPI Water	DPI Water, landuse.enquiries@dpi.nsw.gov.au (contact details provided by Veolia) nsw.agriculture@dpi.nsw.gov.au	Email/letter requesting consultation sent on 14/04/21. No response received.

Table 2 – DPIE Consultation

DPIE Comment	Auditor Response
The IEA needs to ensure that it addresses all the IEA requirements outlined in the Consents.	All of the IEA requirements outlined in the Consents have been addressed.
The IEA is to be consistent with ISO 19011:2002 – Guidelines for Quality and/or Environmental Systems Auditing, or updated versions of this guideline. However, in preparing the audit the Department would like you to also consider the Independent Audit Post Approval Requirements, dated May 2020, which can be located https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf	The IEA has been conducted generally consistent with ISO 19011:2002 and IAPAR (DPIE, 2020).
The IEA is to include consultation with relevant agencies, but not limited to, the following agencies/departments: <ul style="list-style-type: none"> EPA - NSW Environment Protection Authority DPI Water WaterNSW Council – Palerang and Goulburn Mulwaree Councils 	Consultation was sought from the specified agencies, as detailed in Table 1.

Table 3 – EPA Consultation

EPA Comment (based on text messages and telephone conversation)	Auditor Response
Do the independent audits prepared by SLR of the leachate and water management system adequately cover the conditions of the project approval? The EPA are concerned they lack detail and don't adequately assess the cumulative impacts of underperformance of the new LTP.	The Auditors assessed the independent leachate and water management system (LWMS) audits in the Independent Audit Tables (Appendix A), PA 10_0012, Schedule 4, Condition 18R (4.18R). Also refer to Section 4.7 Environmental Performance.
The EPA are concerned that throughput has been below the 4L/s target and that this may have created a backlog	As above

EPA Comment (based on text messages and telephone conversation)	Auditor Response
<p>of untreated leachate sitting in the waste mass. The SLR audits haven't quantified the impact of this on the site water balance as required.</p> <p>Are current systems for demonstrating compliance against condition 65 adequate? (I understand there have been changes to the stormwater management system in the void and it is unclear where the current monitoring point is prior to transfer of stormwater out of the void).</p> <p>What is the current status of management of seepage from ED1 and ED2 (EPL 11436, former Condition U2). The EPA agreed to remove Condition U2.1 from EPL 11436 on the basis that progress reports on the implementation of a management plan were provided to the EPA.</p>	<p>Refer to Independent Audit Tables (Appendix A), DC 31-02-99, Condition 65.</p> <p>Also refer to Section 4.7 Environmental Performance.</p> <p>Refer to Independent Audit Tables (Appendix A), PA 10_0012, Schedule 4, Condition 18D (4.18D), Condition 18M (4.18M) and DC 31-02-99, Condition 70B.</p> <p>Also refer to Section 4.7 Environmental Performance.</p>

Table 4 – Water NSW Consultation

Water NSW Comment	Auditor Response
<p>Water NSW requests that the audit include:</p> <ul style="list-style-type: none"> confirmation the required consultation with Water NSW has occurred as required by <ul style="list-style-type: none"> MP 10_0012 Schedule 4 conditions 17, 17A, 18, 18A, 18AA, 18K, 28, 29 DA31-02-99 condition 55A, 66A, 70, 70M confirmation the required documentation were forwarded to Water NSW as required by <ul style="list-style-type: none"> MP 10_0012 Schedule 4 conditions 18L, 18M, 18V DA31-02-99 condition 18, 70N, 70O confirmation the water quality monitoring required by MP 10_0012 Schedule 4 Condition 17 is occurring confirmation the meteorological monitoring required by MP 10_0012 Schedule 4 Condition 22 is occurring confirmation the environmental management required by MP 10_0012 Schedule 7 conditions 3 and 4 Condition 22 is occurring confirmation the Annual Environmental Reviews required by MP 10_0012 Schedule 7 condition 5 is identifying trends confirmation that the management plan required by DA31-02-99 condition 70 has been prepared confirmation that the modelling required by DA31-02-99 condition 70G has been prepared 	<p>This has been assessed except in relation to conditions not triggered in the current IEA as they were previously assessed (17, 18, 28, 29).</p> <p>This has been assessed.</p> <p>This has been assessed.</p> <p>This has been assessed.</p> <p>This has been assessed.</p> <p>Graphs are provided in the AEMRs and trends in the data are discussed.</p> <p>This has been assessed.</p> <p>This has been assessed.</p>

Water NSW Comment	Auditor Response
<ul style="list-style-type: none"> confirmation that the leak detection system required by DA31-02-99 condition 70P has been prepared confirmation that the surface water monitoring program required by DA31-02-99 condition 132 has been prepared 	<p>This has been assessed.</p> <p>This has been assessed.</p>
<p>Water NSW particular concerns are that the site monitoring data is compared with the modelling to confirm that the environmental practices at the site are performing as expected. If variations are detected between the modelling and monitored then those variations be investigated and appropriate actions taken</p>	<p>This has been assessed to a degree in the Independent Audit Tables (Appendix A). Also refer to Section 4.7 Environmental Performance.</p>

3.6 Compliance Status Descriptors

This Audit Report has been prepared in accordance with the requirements for an Independent Audit Methodology and Independent Audit Report in DPIE's *Independent Audit Post Approval Requirements* (May 2020). As such, the following compliance status descriptors have been used:

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.

Observations have also been made that identify opportunities for improvement.

4. AUDIT FINDINGS

4.1 Approval and Document List

The following approvals and documents provided by Veolia and/or available on the Veolia project website, as well as the NSW EPA website, were reviewed by the Auditors:

- ANZ Guarantee No. DG368313418, Amendment No. 4, 29/08/2018
- ANZ Guarantee No. DG368313418, Amendment No. 5, 29/08/2019
- ARRB, Letter to Veolia Re: Proposal for review of climbing lane requirements and traffic impact assessment, 21/08/2020
- Bushfire PWS Monthly Reports up to February 2021
- Completed form, Appointment of Council as Principal Certifying Authority (PCA) & Contract for Council to Undertake Certification Work, not dated.
- Costin Roe Consulting, Civil Works Plan, C012424.02-C40, Issue 2, 21/02/2018
- Development Consent for DA/0322/1920, 17/07/2020.
- DPIE email to Veolia, Subject: Woodlawn Long-term leachate management LEMP LMP EPA Comments, 17/08/2018
- DPIE letter re. Veolia Woodlawn Bioreactor and Mechanical Biological Treatment Facility, Approval of Increase in Regional Waste Limits (MW 10_0012 and MP 06_0239), 26/04/2018
- DPIE letter re. Veolia Woodlawn Bioreactor, Approval of Increase in Regional Waste Limits (MW 10_0012), 04/07/2019
- DPIE letter re. Woodlawn Bioreactor, Landfill Environmental Management Plan (DC 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018
- DPIE letter re. Woodlawn Bioreactor, Landfill Environmental Management Plan (DC 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018.
- DPIE letter re. Woodlawn Waste Management Facility (SSD 10_0012), Request for Extension to Receive Bushfire Waste 15/10/2020
- DPIE Letter, Re. Woodlawn Bioreactor Expansion Project (MP10_0012), Audit Team Approval Request, 05/02/2021
- Department Letter to Veolia, Re: Woodlawn Bioreactor Expansion Project (PA 10_0012), Independent Odour Audit 2019/20, not dated.
- DPIE, DustWatch Reports, <https://www.environment.nsw.gov.au/topics/land-and-soil/soil-degradation/wind-erosion/community-dustwatch/dustwatch-publications>
- Earth2Water Pty Ltd (E2W), Woodlawn Bioreactor; Construction Quality Control Assurance for Lining Evaporation Dam (ED3SS), November 2015 to July 2016, 05/09/2016 (Appendix B, Soil and Water Management Plan For Woodlawn Bioreactor, Final, 07/09/2018)
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- Veolia, Noise Monitoring Management Plan For Woodlawn Bioreactor, Final, 24/07/2018
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- Veolia, NSW Woodlawn Bioreactor Alternative Daily Cover Trial Progress Report, 24/08/20
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- Veolia, WL – Eco-Precinct Odour Complaint Response, 20/04/2020
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- Veolia Email and Letter to EPA, Re. CQA Report- ED1 Coffe dam Woodlawn Bioreactor, 31/10/18
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4.2 Compliance Performance

The Auditors assessed the development to be compliant with DC 31-02-99, PA 10_0012, EPL 11436 and EPL 11455, except for the non-compliances shown in Table 5. Refer to the Independent Audit Tables (**Appendix A**) for full details of the identified non-compliances and compliance status of other conditions. Section 5.1 provides recommendations associated with each non-compliance below.

Please note that in the Independent Audit tables, Approval ID numbers for PA 10_0012 have been numbered such that the first number identifies the Schedule and the second number identifies the Condition (e.g. 3.1 represents Schedule 3, Condition 1). In regards to DC 31-02-99, all of the referenced Conditions are from Schedule 2.

Table 5: Summary of Non-compliances

NC#	Approval ID	Non-compliance
PA 10_0012		
NC1	3.5	The limit for maximum waste input rates at the Landfill for waste received as residual waste from the MBT was exceeded in the 2019 and 2020 AEMR reporting periods. The limit for maximum waste input rates at the Landfill for putrescible regional waste received by road was exceeded in the 2020 AEMR reporting period. There is no evidence that the issue of the climbing lane has been closed out to the satisfaction of GMC (i.e. not needed).
NC2	3.9	The Leachate Treatment Plant (LTP) was occupied prior to the issue of an occupation certificate (07/04/2021).
NC3	4.18D	Veolia transferred ~50 ML stormwater from ED3S to ED2 during the Audit Period. There is no evidence available to the Auditors that the seepage or leakage points identified in ED2 have been repaired to the satisfaction of the Department and EPA prior to the transfer of any stormwater from ED3S to ED2.
NC4	4.18E	The LTP was commissioned on 04/10/2018, which was four days after the stipulated completion date of 30/09/18.
NC5	4.18M	There is no evidence that quarterly updates have been submitted to Water NSW or the Department in accordance with this Condition.
NC6	5.20	This non-compliance continued from the previous IEA through to November 2020 when the Tarago Loop Extension works were completed and the train was no longer required to be split in two.
NC7	6.4	The Transport Code of Conduct was last issued in 2011 and was not updated in consultation RMS, Goulburn Mulwaree Council, Palerang Council and the Community Liaison Committee to the satisfaction of the Department prior to the receipt of more than 50,000 tpa of regional waste.
NC8	7.7	Four complaints between 19/04/2018 and 26/05/2018 were not published on the website within seven days of a complaint being made.
NC9	7.8	Waste volume limits were exceeded during the Audit Period, which represent an 'incident', as defined in PA 10_0012, Schedule 2, Definitions. The waste volume limit exceedances were not notified and reported to the Department within the required timeframes.
NC10	7.9	The SWMP was not reviewed and updated following the LWMS Audit and revision of the water balance in 2020, and changes to the stormwater system.
DC 31-02-99		
NC11	18	A Compliance Report has not been issued for more than two years.
NC12	70A	Quarterly updates to the EPA and DPIE of the leachate volume in ED3SS and remaining volume were not available.
EPL 11436		
NC13	O6.17	The Total VOCs measured at the LFG Inlet (Point 5) and the Engine 1 Exhaust Stack (EPA Point 8) were 56 g/min and 1.8 g/min, respectively, resulting in a calculated destruction efficiency of 96.8% for Engine 1, which is less than the required minimum destruction efficiency of 98%.
NC14	O6.31	The progress report on the Alternative Daily Cover (ADC) trial was not provided to the EPA within the required 90-day timeframe.
NC15	M8.1	The mechanical evaporator log was not maintained in accordance with this Condition up to late 2020 / early 2021 before a continuous monitoring system was implemented.
NC16	R4.2	Three odour complaint reports were not provided to the EPA within the required 24-hour timeframe.
NC17	U1.2	Whilst the LTP has been designed to continuously treat at least 4 L/s of leachate and therefore, should be capable of doing so, the LTP has yet to achieve the minimum rate.
Number of non-compliances identified:		17
Total number of compliance requirements:		502

4.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

No Agency Notices, Orders, Penalty Notices or Prosecutions have been issued in relation to the development.

4.4 Previous Audit Recommendations

An assessment of progress on the recommendations made in the 2018 IEA is presented in Table 6.

Table 6: Status of Previous Audit Recommendations

Approval ID	2018 IEA Recommendation	Action
Non-compliance recommendations		
PA 10_0012, 5.20	Clarify with the DPE whether approval is required for continued splitting of the second train each day at Goulburn into two movements to the IMF until the Tarago rail upgrade works are complete	The non-compliance continued until the Tarago Loop Extension works were completed in November 2020. The number of trains per day has reverted back to 2 in compliance with the Condition.
PA 10_0012, 7.2	Verify that all current members of the CLC have been endorsed by the DPE.	The 2018 AEMR indicated that Veolia verified with the Department that the CLC members were endorsed by the Department in May 2018.
EPL 11436, M2.3	Progress modification of EPL 11436 to completion to address decommissioning of monitoring point 44.	Point 44 was removed from EPL 11436 in the licence variation issued 22/08/18.
Opportunity for Improvement Recommendations		
PA 10_0012, 4.7	Consider improvement to the IOA scope to allow for a more quantitative assessment of offensive odour impacts in the community, through dispersion modelling, detailed complaints analysis, etc.	Dispersion modelling was conducted for the 2019 and 2020 IOAs. A detailed odour complaint analysis was not conducted and therefore, this remains as a recommendation for improvement.
DC 31-02-99, 12	Consider whether a new Environmental Management Representative based at the Woodlawn site should be appointed.	The EMR has not changed since the previous IEA.
DC 31-02-99, 32	Improve measures for the clean-up of a putrescible waste spill in the Emergency Response Plan.	The ERP includes Emergency Response Procedures for spills of putrescible waste and a railway collision or derailment. It does not include a truck rollover scenario involving a spill of putrescible waste on a public road.
DC 31-02-99, 43 & EPL 11436, O6.16	Ensure flare average residence time is correctly reported in the AEMR and Annual Return and also provide the lowest and highest values for the reporting period.	The 2018 and 2019 AEMRs and Annual Returns continued to report the residence time incorrectly (<0.3s) but was corrected for the 2020 reports. However, the figures remained static and did not show actual minimum, average or maximum values.
DC 31-02-99, 51 & EPL 11436, O6.5	References in the overarching 2016 LEMP to the barrier system and the 2004 BSQAP should be simplified.	There was no change to Section 1.3.7.2 of the LEMP relating to the Bioreactor Performance Management Plan.
EPL 11436, O3.2 & EPL 11455, P1.1	Update the IMF EMP, as required, to show the correct location of Point 4/DG18.	The IMF EMP Has not been revised and the IMF site plan still shows Point 4 / DG18 in the incorrect location.
EPL 11436, L3.3	It will be necessary to modify EPL 11436 before receiving over 50,000 tpa of putrescible regional waste by road.	The limit for putrescible regional waste received by road was increased to 90,000 tpa in a licence variation to EPL 11436 issued 22/08/18.
EPL 11436, O6.7	EPL 11436 should be modified to permit leachate to be received from the Banksmeadow Intermodal Facility as well as the Clyde Intermodal Facility.	Condition O6.7 of EPL 11436 was modified in the licence variation issued 22/08/18 to allow leachate and washdown water from the Banksmeadow Transfer Terminal and Clyde IMF.

4.5 EMPs, Sub-plans and Post Approval Documents

Adequacy and compliance with the management plans, subplans and Post Approval documents (e.g. Independent Audit Reports) relevant to the Audit Period were assessed. The LEMP was

updated in 2018 and approved by the DPIE. The IMF EMP has not been updated since 2016. Management plans were generally considered to be adequate although it was observed that aspects of the SWMP required updating. Activities at the development during the Audit Period were considered to be generally consistent with the management plans and sub-plans listed in Section 4.1. The Applicant's actions responding to the 2018 IEA recommendations were considered adequate, although two of the opportunities for improvement recommendations had not been actioned. In particular, a detailed odour complaint analysis had not been conducted in the IOAs and the location of Point 4 / DG18 was still shown in the incorrect location in the IMF EMP.

4.6 EMS

The sites operate under Veolia's integrated management system which includes quality, health safety and environmental management. Measures to prevent and/or minimise harm to the environment are outlined in the Landfill Environmental Management Plan (LEMP) and IMF EMP. Veolia has developed and implemented the measures required under the DC 31-02-99 and PA 10_0012 to prevent and/or minimise any harm to the environment that may result from their operations. The review of site documentation; observations and interviews with site representatives demonstrated that the existing environmental management system is considered generally adequate in addressing the development consent requirements. The overarching LEMP, IMF EMP and various sub-plans have been approved by the DPIE, with the possible exception of the Air Quality and Greenhouse Gas Management Plan (AQGGMP). Veolia has advised that work is currently being undertaken to review and update the plans and sub-plans.

4.7 Environmental Performance

As shown in Table 5, there were seventeen (17) non-compliances during the Audit Period of which six (6) are considered to be administrative in nature. Based on consultation, both the EPA and Water NSW expressed uncertainty as to whether conditions were being fully implemented and complied, including consultation requirements, indicating stakeholder engagement could be improved.

The Auditors understand that Veolia has invested considerable effort during the Audit Period to improve environmental performance including the commissioning and operation of the LTP, lining of evaporation dams, improvements to the landfill gas extraction system, mechanical evaporation systems and process control systems, which collectively may have successfully reduced odour emissions. However, the Auditors made the following observations:

- There is inconsistency between approvals in relation to limits for waste input rates, possible incorrect reporting of waste volumes, and the issue of the climbing lane has yet to be resolved to the satisfaction of GMC, which is relevant to setting the approved limit for putrescible regional waste received by road;
- The LTP has yet to achieve the minimum leachate treatment rate of 4 L/s since it was commissioned almost 2.5 years ago;
- Veolia has given responsibility for the monitoring and management of ED2 to Heron Resources and there is no evidence that previously identified seepage and leakage points have been identified and repaired to the satisfaction of the Department and EPA prior to the transfer of Bioreactor void stormwater from ED3S to ED2; and
- It appears that progress reports may not have been provided to Authorities as required, that has resulted in an increased level of concern, in particular that monitoring may be inadequate to prevent flooding of the Bioreactor and the generation of excessive leachate that the LWMS, LTP and gas extraction systems can collectively manage, which worst-case, may result in increased odour emissions and/or pollution of land, surface water and groundwater.

It is critical that the environmental monitoring systems are operated and maintained properly and efficiently and the monitoring results are considered and interpreted appropriately in order to address an emerging issue before it becomes an emergency. The Auditors note that this was a particular concern of the Water NSW Catchment Assessments Officer. The project approvals have

provided for independent reviews of the odour management system and the leachate and water management system, as well as this Audit, which assesses overall compliance with the approval conditions. However, the Auditors make the following observations:

- This IEA has been conducted as a high-level audit of all of the approval conditions to assess whether Veolia has complied with them;
- The Auditors conducted a limited assessment of the various individual environmental management systems or their interaction, and therefore, reliance is placed on the other independent auditors (Independent Odour Audit and Leachate and Water Management System Audit) to have adequately performed their scope of work;
- The Auditors have not reviewed in detail the water balance modelling performed by WSP in 2017 and 2020. However, it appears that the model has been used to assess evaporation dam capacities under various inflow and outflow scenarios, as shown in the schematic below (Veolia, SWMP, Appendix D, 2018).

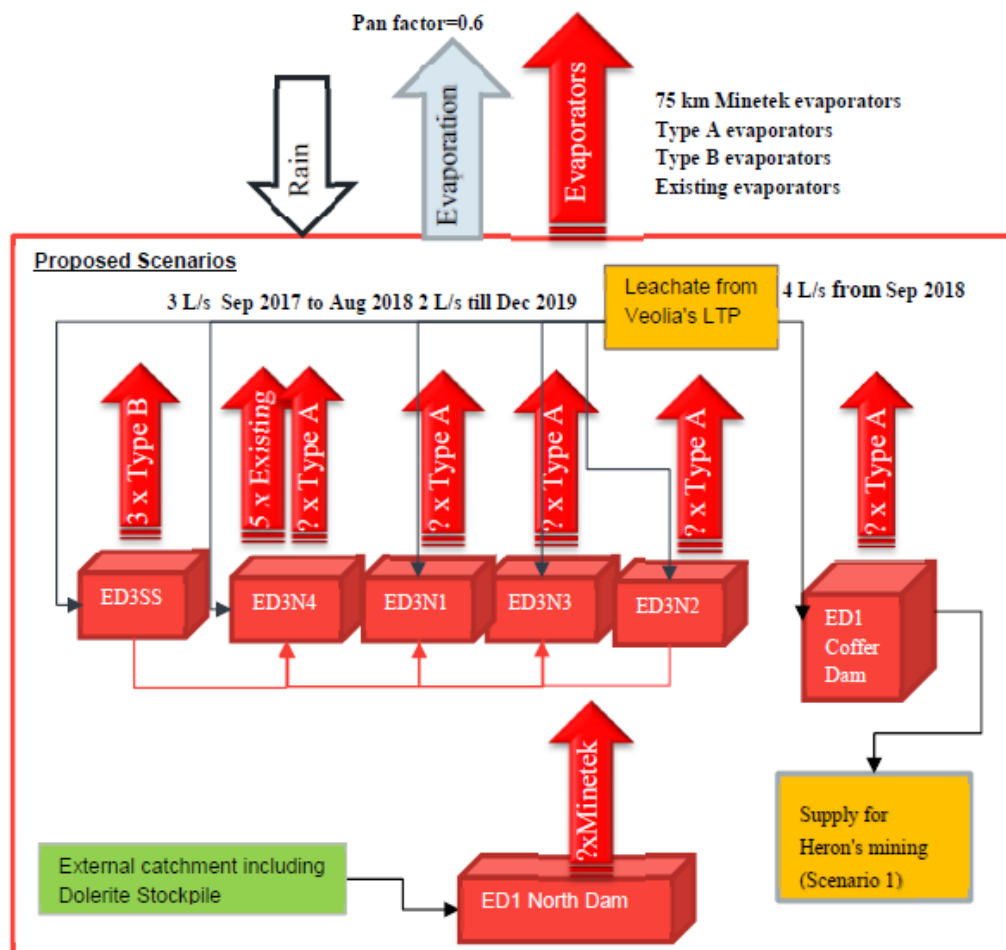
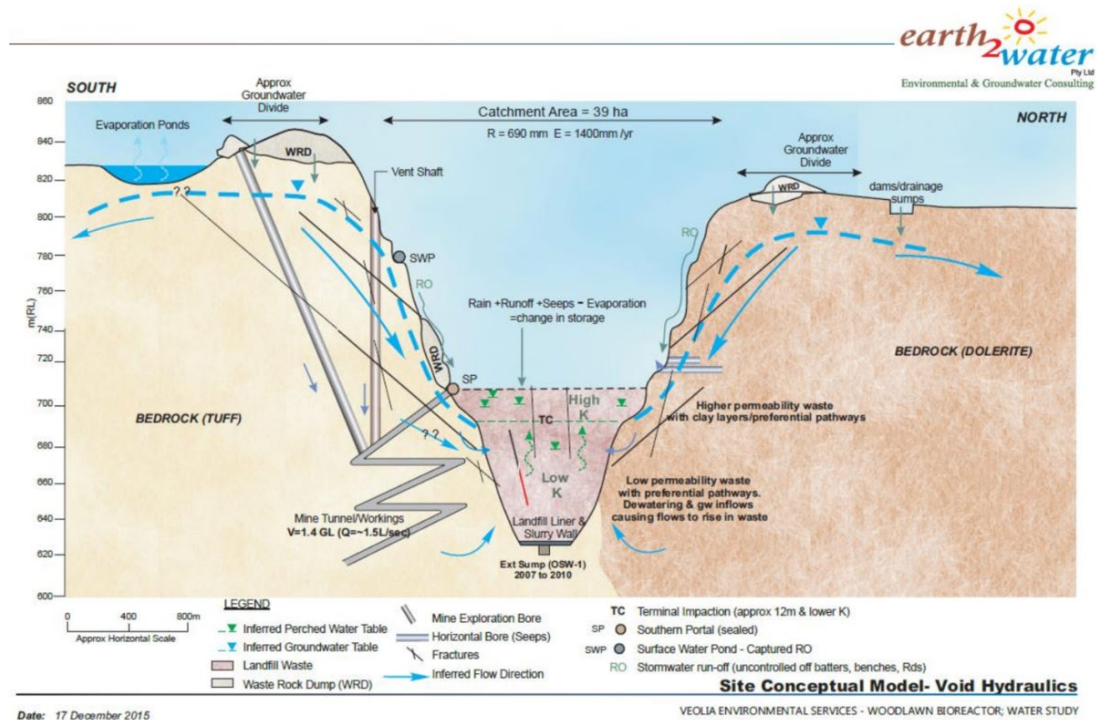


Figure 4.1 Schematic representation of modelled dams in GOLDSIM

Based on consultation with the EPA and Water NSW for this Audit, they are primarily concerned about the build-up of leachate in the Bioreactor void and gave the Auditors the impression that the water balance modelled the Bioreactor void, as opposed to the evaporation dams. The Auditors suggest that Veolia consult with the EPA, Water NSW and the Department to ascertain their expectations in relation to the water balance model and whether the model and associated condition(s), should be modified to better meet their expectations.

- The LWMS audit requirement is outlined under Schedule 4, Condition 18R of PA 10_0012, which requires an assessment of the water balance model and "whether the leachate and

water management system is achieving its intended objectives". However, the objectives referred to by the LWMS mainly relates to the dams and separation of stormwater from leachate to minimize leachate production and do not consider other aspects such as waste inputs to the Bioreactor and the interaction between leachate and groundwater. The LWMS audit report does not refer to a review of groundwater monitoring data, to assess the status of the Bioreactor void, as shown in the site conceptual model attached to the LMP as Appendix F.



- The Auditors suggest that Veolia consult with the EPA, Water NSW and the Department to understand the objectives for the LWMS Audit and consider whether the scope of the Audit should be broadened or be targeted to address the desired objectives.

Furthermore, the project approvals contain over 500 conditions, of which a number are superseded and/or duplicated in the later approval PA 10_0012. Hence, the size and complexity of the project approvals increases the difficulty for all personnel to fully understand and monitor various conditions and their requirements. Given the size and complexity of the approvals, it is considered that overall, Veolia has performed reasonably well. The Auditors note that more than 50 additional conditions were triggered during this Audit due to construction of the LTP and works on evaporation dams, that required auditing, compared to the 2018 IEA.

4.8 Complaints

Veolia maintains a complaints register that is updated regularly as complaints arise. Veolia also run a Community Liaison Committee that last met on 18 March 2021 and appeared to be reasonably well attended. The minutes are available on Veolia's Woodlawn Bioreactor, NSW webpage. Odour complaint reports are also produced and are provided to the EPA. Whilst odour continues to be an issue for the community, there has been a 50% reduction in odour complaints during the Audit Period, which represents a significant improvement.

4.9 Incidents

No incidents that presented an actual or potential risk of material harm to the environment occurred during the Audit Period. However, it should be noted that there were exceedances of waste volume limits that were not notified and reported to the Department as required under Schedule 7, Condition 8 of PA 10_0012, which represents a non-compliance (NC9).

4.10 Actual Versus Predicted Environmental Impacts

As mentioned in Section 4.9, aside from exceedances of waste volume limits, there have been no environmental incidents that resulted in material harm during the Audit Period. The Auditors have not identified significant inconsistencies between actual environmental impacts and the predicted environmental impacts.

4.11 Site Inspection

The Auditors carried out a site inspection on 17 March 2021 accompanied by selected Veolia personnel referred to in Section 3.4. Photographs taken during the site visit are provided in **Appendix D**.

4.12 Site Interviews

A meeting was held at the Veolia site office located at the Woodlawn Eco-Precinct on the day of the site visit that involved the Auditors and Veolia personnel referred to in Section 3.4. Information regarding the Project was provided, and documents and records were reviewed. Further information was later provided on request via email and Google Drive.

4.13 Improvement Opportunities

Opportunities for improvement in relation to the project approvals and EPLs have also been identified as shown in the following table. Refer to Section 5.2 for recommended actions. Refer to the Independent Audit Tables (**Appendix A**) for full details.

Table 7: Opportunities for Improvement

Condition	Opportunity for Improvement
PA 10_0012, 3.5	There is an inconsistency to references to regional waste and putrescible regional waste in PA 10-0012 which requires clarification as this impacts on assessment of compliance with limits. There is also inconsistency between the putrescible regional waste limit for the Bioreactor between this Condition and EPL 11436, Condition L3.3 (90,000 tpa). It is also noted that Condition 6 of this Schedule (i.e. 3.6) refers to a limit of 130,000 tpa for "regional waste" (not putrescible regional waste) received by road at the Landfill but that is not an approved limit.
PA 10_0012, 4.2	A VENM certificate from Denrith Pty Ltd did not provide the address of the source site, Reynolds Pit, and the certificate does not provide photographs or other evidence demonstrating that the material is in fact VENM.
PA 10_0012, 4.7	The IOA did not include a detailed odour complaint analysis as recommended in the previous IEA and in accordance with the Department's consultation requirement. This is a repeat finding.
PA 10_0012, 4.9	Records showing the submission of the 2019 IOA and Veolia's response were not available.
PA 10_0012, 4.11	The available tabulated data for dust monitoring do not record "extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agree to by the [Department] in consultation with [EPA]" for the purpose of excluding elevated data linked to extraordinary events.
PA 10_0012, 4.18R	It is considered that the water balance model in its current form is not sufficient to assess the overall performance of the LWMS.
PA 10_0012, 4.25B	Two to three Intermediate Bulk Containers (IBCs) that from a distance appeared empty and labelled as corrosives were stored at Crisp Creek IMF outside a bunded area.
PA 10_0012, 5.14	The Auditors observed that whilst there was evidence of slope stability erosion controls used in a swale drain at the IMF, the sides of the drain had eroded in some places and required maintenance.
PA 10_0012, 7.5	The Auditors observe that whilst non-compliances are discussed in the AEMRs (e.g. waste volume limit exceedances), they are not always clearly identified as a "non-compliance".
PA 10_0012, 7.8	The Auditors observed that Veolia's ERP / PIRMP does not refer to the requirement to notify the Department in accordance with this Condition.

Condition	Opportunity for Improvement
PA 10_0012, 7.10	The majority of the required documents are provided on the Veolia's Woodlawn Bioreactor, NSW webpage, with the exception of Veolia's responses to the IOAs.
DC 31-02-99, 19	Correspondence could not be provided showing that the 2018 IEA report was submitted to DPIE, EPA, DoL L&W, Council and the Community Liaison Committee. However, the Auditors recall that Veolia advised the report had been submitted to DPIE. Veolia maintains, and the Auditors find it reasonable, that the requirement to submit the IEA report to all of the specified stakeholders is not required under Condition 6, Schedule 7, PA 10_0012, which supersedes this Condition.
DC 31-02-99, 32 & 151	The ERP does not provide an Emergency Response Procedure for a truck rollover and spill of waste on a public road, that may be within an agricultural area (Condition 151).
DC 31-02-99, 65	Changes to the stormwater collection and transfer system in the void have occurred during the Audit Period, including the transfer and EPL monitoring point, which are not reflected in the 2018 SWMP and potentially the EPL 11436. The monitoring location is also unclear to the EPA.
DC 31-02-99, 70	The LEMP, SWMP and LMP address management of ED3. It is considered that the management plans for ED3 dams do not adequately address: leak detection monitoring of all pipelines used to transfer leachate and treated leachate; leachate quality targets; and performance indicators, which are not clearly stated. Performance indicators should include the indicators discussed in the monthly LTP reports (e.g. MLSS in biological process, throughput rate, effluent quality, foaming, sludge wasting, centrifuge performance, etc) that can be assessed relative to appropriate targets.
DC 31-02-99, 125 & 127	Dust is not identified as a potential environmental impact in the IMF EMP and therefore, dust control measures are not included.
DC 31-02-99, 131	The SWMP does not detail how the groundwater height should be reported against water table contours around the site and should be monitored and reported to assess any variation over time, and importantly, ensure that the groundwater continues to flow towards the void. There is also no connection made to the monitoring of the saturation level of the leachate in the Bioreactor void, which is addressed in the LMP.
DC 31-02-99, 132	The SWMP does not address all of the requirements of this Condition, particularly, monitoring of volumes that are transferred from one location to another (e.g. void to ED3, ED3 to void, ED3S to ED2). Currently, data is not readily available to demonstrate, for example, that no transfers have occurred between ED3S and ED2. If this data was being monitored and recorded, even if transfers are zero, it would provide a record.
DC 31-02-99, 134	The requirement to notify the EPA as soon as practicable after becoming aware that the height of the saturation level in the waste is above the height of the groundwater table that surrounds the mine void is not addressed within the LEMP, the LMP or the SWMP.
DC 31-02-99, 153	The Landscaping and Vegetation Management Plan (LVMP) does not refer to Buttercup Doubletail.
DC 31-02-99, 160	The LEMP and IMF EMP do not refer to a complaint verification procedure that aims to correlate potential sources of odours with an operation or activity by assessing relevant meteorological data.
EPL 11436, O6.11	The LEMP and SWMP do not mention the requirement to apply an additional 15cm of cover material (i.e. 30 cm depth) over surfaces of the landfilled waste which have had 15 centimetres of cover material for more than 90 days.
EPL 11436, O6.16	Both residence time and temperature are reported as static and not as minimum, maximum and average values in the Annual Returns. This is a repeat finding.
EPL 11436, P1.1	The drawing showing the EPL monitoring locations (Drawing No. 16735-16) still shows DG18 as being at the western end of the site and not near the site office as observed during the site visit, although the drawing does not indicate where the entrance and site office are located. This is a repeat finding.

Condition	Opportunity for Improvement
General	The Auditors question whether the objectives of the water balance model are aligned with the expectations of the EPA and Water NSW.
General	The objectives that the LWMS audit assessed mainly relate to the dams and separation of stormwater from leachate to minimize leachate production and do not consider other aspects such as waste inputs to the Bioreactor and the interaction between leachate and groundwater. The LWMS audit report does not refer to a review of groundwater monitoring data, to assess the status of the Bioreactor void.
General	The project approvals contain over 500 conditions, of which a number of them are superseded and/or duplicated by the later approval PA 10_0012. Hence, the size and complexity of the project approvals increases the difficulty to fully understand and monitor the various conditions and their requirements.

4.14 Key Strengths

The Auditors consider management of the site operations by Veolia to continue to be of a generally good standard. Specifically, the management odours and improvements to the various landfill management systems during the Audit Period (e.g. commissioning LTP and ED1 Coffey Dam, improved capture and separation of stormwater in the void, expansion of the power plant and capture of landfill gas) should be noted. Recommendations have been made in Section 5.2 to further improve management systems and environmental performance.

5. RECOMMENDATIONS AND OPPORTUNITIES FOR IMPROVEMENT

5.1 Non-compliance Recommendations

Table 4 provides a summary of the recommendations made in relation to non-compliances with SSD 8517.

Table 8: Non-compliance Recommendations

NC#	Condition	Recommendation
PA 10_0012		
NC1	3.5	<p>The Auditors recommend that Veolia confirm the quantities of putrescible regional waste received by the Bioreactor during the 2019 and 2020 reporting periods to determine if the approved limit of 90,000 tpa was exceeded.</p> <p>The Auditors recommend that Veolia investigate the causes for the confirmed limit exceedances and undertake appropriate corrective actions to prevent a reoccurrence.</p> <p>The Auditors recommend that Veolia confirm that GMC accept ARRB's advice that the climbing lane is not considered necessary.</p>
NC2	3.9	No recommendation is provided as the Occupation Certificate for the LTP has been issued.
NC3	4.18D	The Auditors recommend that prior to transferring anymore stormwater from ED3S to ED2, Veolia should establish that the leakage points in ED2 have been identified and repaired to the satisfaction of the Planning Secretary and EPA.
NC4	4.18E	No recommendation is required as the LTP is operational.
NC5	4.18M	The Auditors recommend that quarterly reports be provided to the EPA, Water NSW and the Department of the leachate volume in the ED1 Coffey Dam and the remaining leachate storage volume.
NC6	5.20	No recommendation is required as the non-compliance has been addressed.
NC7	6.4	The Auditors recommend that Veolia's Transport Code of Conduct be updated in consultation RMS, Goulburn Mulwaree Council, Palarang Council and the Community Liaison Committee, and to the satisfaction of the Department.
NC8	7.7	No recommendation is required as the non-compliance has been addressed.
NC9	7.8	The Auditors recommend that Veolia conduct an investigation as to why the Department was not notified of these exceedances (e.g. failure to identify the waste volume limit exceedances as an 'exceedance' and/or an 'incident', failure to understand this Condition, this requirement not specified in a procedure?) and based on the investigation findings carry out appropriate corrective action(s) to prevent a reoccurrence.
NC10	7.9	The Auditors recommend that the LEMP and its sub-plans, particularly the SWMP, be reviewed and revised, as appropriate, which we understand Veolia is already in the process of doing. Veolia should consider the

NC#	Condition	Recommendation
		EPA's previous comments in relation to the SWMP and LMP (16/08/2018).
DC 31-02-99		
NC11	18	The Auditors recommend that Veolia contact the Department to seek advice on whether a Compliance Report is required retrospectively. Veolia could also seek advice on whether this Condition can be modified. Depending on the Department's requirement, Veolia should consider how to ensure that future Compliance Reports are not missed.
NC12	70A	The Auditors recommend that Veolia provide quarterly updates to the EPA and DPIE.
EPL 11436		
NC13	O6.17	The Auditors recommend that future gas engine emission test reports, report the calculated destruction efficiency correctly and that Veolia report potential non-compliances as required under the EPL.
NC14	O6.31	No recommendation is required as the alternative daily cover trial progress report was issued.
NC15	M8.1	No recommendation is required as a continuous monitoring system of the mechanical evaporators has been implemented.
NC16	R4.2	The Auditors recommend Veolia review the complaints response process and consider appropriate corrective actions to ensure that the 24-hour report requirement is met on an ongoing basis.
NC17	U1.2	The Auditors recommend that Veolia continue to optimise the LTP performance to achieve the required minimum 4 L/s leachate treatment rate.

5.2 Opportunity for Improvement Recommendations

Table 9 provides a summary of the additional continual improvement recommendations identified as part of this Audit. Specific details are included in the Independent Audit Tables (**Appendix A**).

Table 9: Opportunity for Improvement Recommendations

Condition	Recommendation
PA 10_0012, 3.5	The Auditors recommend that Veolia seek to clarify with the Department and EPA the various waste volume limits in the approvals to ensure that they are clearly defined in relation to the type of waste and the limits are consistent between conditions and approvals.
PA 10_0012, 4.2	The Auditors recommend as an opportunity for improvement that Veolia obtain further evidence to support claims that material imported to site as waste cover material is VENM.
PA 10_0012, 4.7	The Auditors recommend as an opportunity for improvement that a detailed odour complaint analysis be conducted for the next IOA that includes an assessment of environmental parameters, LTP operational conditions and consideration of the complainants, as per the Department's consultation requirement. The Auditors also suggest that the Independent Odour Auditor avoid making generic recommendations. If the Auditor is satisfied that Veolia's actions are appropriate then there may be no need to make a recommendation.
PA 10_0012, 4.9	The Auditors recommend as an opportunity for improvement that Veolia confirm that the 2019 IOA and response were submitted to both the Department and the EPA.

Condition	Recommendation
PA 10_0012, 4.11	The Auditors recommend that observations of extraordinary events be recorded in sampling field records and in the data spreadsheet with appropriate evidence so that results impacted by such events may be excluded (evidence based) from the average calculation.
PA 10_0012, 4.18R	The Auditors recommend as an opportunity for improvement, that Veolia in consultation with the EPA, may consider whether a different, more complete water balance model could be used to determine whether the LWMS is achieving its intended objectives. Alternatively, consider modifying this Condition(s) in order to provide clarity on more realistic and achievable assessment goals.
PA 10_0012, 4.25B	The Auditors recommend as an opportunity for improvement that the status of these IBCs be reviewed in relation to their contents, labelling and storage location.
PA 10_0012, 5.14	The Auditors recommend as an opportunity for improvement, that the drain be inspected and repaired.
PA 10_0012, 7.5	The Auditors recommend as an opportunity for improvement that the AEMRs more clearly identify non-compliances and the Auditors suggest a separate section be included in the AEMR that provides a summary of the identified non-compliances.
PA 10_0012, 7.8	The Auditors recommend as an opportunity for improvement that the ERP / PIRMP be reviewed and revised to include the requirement to notify the Department in accordance with this Condition if the incident presents a risk of material.
PA 10_0012, 7.10	The Auditors recommend as an opportunity for improvement that the responses to any Independent Environmental or Odour Audit are uploaded to the webpage along with the audit report. It is recommended that responses are provided as a separate document to the audit reports.
DC 31-02-99, 19	The Auditors recommend as an opportunity for improvement that Veolia seek advice from DPIE as to which stakeholders the IEA reports are required to be submitted to.
DC 31-02-99, 32 & 151	The Auditors recommend as an opportunity for improvement, that the ERP provide an Emergency Response Procedure for a truck rollover and spill of waste on a public road.
DC 31-02-99, 65	The Auditors recommend as an opportunity for improvement that the SWMP be reviewed and revised to reflect current void stormwater management practices and EPL 11436 requirements.
DC 31-02-99, 70	the Auditors recommend as an opportunity for improvement that the management plans and particularly, the LMP, be reviewed and revised to address all of the requirements of this Condition adequately.
DC 31-02-99, 125 & 127	The Auditor recommends as an opportunity for improvement that the IMF EMP be revised to include wind-blown dust emissions as a hazard (particularly given EPL 11455, Condition O3.1) and document the management control measures (maintaining paving, hardstand and vegetation cover).
DC 31-02-99, 131	The Auditors recommend as an opportunity for improvement, that the SWMP be reviewed and revised to include monitoring and reporting the groundwater contours and flow direction, as well as the height of the saturation level in the Bioreactor void to verify that groundwater continues to flow towards the void.
DC 31-02-99, 132	The Auditors recommend as an opportunity for improvement, that the SWMP be reviewed and revised to include all of the monitoring requirements from Condition 132, including those that have yet to be triggered.
DC 31-02-99, 134	The Auditors recommend as an opportunity for improvement that the notification requirement, and more specifically EPL 11436, Conditions R3.5 and R3.6, be documented in the LEMP, SWMP and LMP. It should be included in all three management plans because it is dependent on aspects of groundwater and leachate monitoring, and a key performance indicator for the Bioreactor.

Condition	Recommendation
DC 31-02-99, 153	The Auditors recommend as an opportunity for improvement, that Veolia consider adding a section to the LVMP that provides information on the Buttercup Doubletail and any other threatened or vulnerable species known to be in the region. Consider including a picture and means of raising awareness with site personnel that this species may be present and if it is sighted to report it so that it may be conserved in accordance with this Condition.
DC 31-02-99, 160	The Auditors recommend as an opportunity for improvement, that the LEMP, IMF EMP and the Odour Complaint Response procedure be reviewed and revised to more clearly state that a complaint verification procedure using meteorological data is required and implemented.
EPL 11436, O6.11	The Auditors recommend as an opportunity for improvement that the LEMP address the requirement to apply an additional 15cm of cover material (i.e. 30 cm depth) over surfaces of the landfilled waste which have had 15 centimetres of cover material for more than 90 days..
EPL 11436, O6.16	The Auditors recommend as an opportunity for improvement that Veolia consider modifying future Annual Returns and AEPRs / AEMRs to show minimum, maximum and average values.
EPL 11436, P1.1	The Auditors recommend as an opportunity for improvement that the EPL monitoring location plan be reviewed in consultation with the EPA to ensure that the dust gauge samples are being collected in the approved location.
General	The Auditors suggest that Veolia consult with the EPA, Water NSW and the Department to ascertain their expectations in relation to water balance model and whether the model and associate Condition(s), should be modified to better meet their expectations.
General	The Auditors suggest that Veolia consult with the EPA, Water NSW and the Department to understand and better define the objectives for the LWMS Audit and consider whether the scope of the audit should be broadened or more targeted to address the desired objectives.

6. CONCLUSIONS

The Auditors consider that overall environmental practices for the site are generally adequate with evidence of improvements in environmental performance including the commissioning and operation of the LTP, lining of evaporation dams and improvements to the landfill gas extraction system, mechanical evaporation systems and process control systems. The Auditors note that more than 50 additional conditions were triggered during this Audit due to construction of the LTP and works on evaporation dams, that required auditing, compared to the 2018 IEA.

There were seventeen (17) non-compliances during the Audit Period of which eleven (11) are considered to be administrative in nature. The three non-compliances from the previous 2018 IEA were addressed.

The Auditors consider management of the site operations by Veolia to continue to be of a generally good standard. Based on consultation, it is considered that stakeholder engagement could be improved. Twenty-seven opportunities for improvement have been identified for which we provide twenty-six recommendations.

APPENDIX A

INDEPENDENT AUDIT TABLES

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
SCHEDULE 3. ADMINISTRATIVE CONDITIONS					
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
3.1	The Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation or decommissioning of the Project.	<ul style="list-style-type: none"> Landfill Environmental Management Plan, 30/08/18 prepared by Veolia (2018 LEMP) 	Measures to prevent and/or minimise harm to the environment are outlined in the 2018 Landfill Environmental Management Plan (LEMP). Specific requirements of the LEMP are audited under the relevant conditions below. Veolia has developed and implemented the measures required under the development consent to prevent and/or minimise any harm to the environment may result from their operations. The review of site documentation; observations and interviews with site representatives demonstrated that the existing environmental management system is considered generally adequate in addressing the development consent requirements.	Compliant	
TERMS OF APPROVAL					
3.2	The Proponent may only carry out the Project generally in accordance with the: (a) EA; (b) statement of commitments (see Appendix 1); (c) all written directions of the Planning Secretary; (d) site layout plans and drawings in the EA (see Appendix 2); and (e) Modification Assessments; (e) conditions of this approval.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	There have reportedly been no written directions from the Planning Secretary. The Auditors' review of documentation, audit observations and interviews with site representatives demonstrated the operation of the site has to date been conducted generally in accordance with the identified documents and conditions of this consent. Compliance with these requirements are audited under specific conditions below.	Compliant	
3.3	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		No inconsistencies have been noted.	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012													
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #								
	this approval shall prevail to the extent of any inconsistency.												
3.4	The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department’s assessment of: a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this approval; and b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	<ul style="list-style-type: none">Interview with Veolia personnel, 17/03/2021	Veolia did not receive further requirements from the Department during the Audit Period.										
LIMITS OF APPROVAL													
Woodlawn Bioreactor													
3.5	<p>The Proponent shall not exceed the maximum annual input rates in Table 1 for the Landfill, unless otherwise agreed to by the Director-General in accordance with condition 6 below.</p> <p><i>Refer to table in Approval</i></p> <p><i>Refer to table in Approval</i></p> <table><tr><th colspan="2">Maximum waste input rates at the Landfill</th></tr><tr><td>Putrescible waste received by rail from Sydney</td><td>900,000 tpa</td></tr><tr><td>Received as residual waste from Woodlawn AWT</td><td>100,000 tpa</td></tr><tr><td>Putrescible regional waste received by road</td><td>50,000 tpa</td></tr></table>	Maximum waste input rates at the Landfill		Putrescible waste received by rail from Sydney	900,000 tpa	Received as residual waste from Woodlawn AWT	100,000 tpa	Putrescible regional waste received by road	50,000 tpa	<ul style="list-style-type: none">Annual Environmental Management Report For Woodlawn Waste Expansion Project And Woodlawn Alternative Waste Technology Project, December 2018 (2018 AEMR)Annual Environmental Management Report For Woodlawn Waste Expansion Project & Woodlawn Alternative Waste	<p>The following information on waste volumes was provided in the AEMRs and summaries of Paperless Weighbridge System (PWS) records:</p> <p><u>2018 reporting period:</u> Sydney (rail) – 620,323 t (WB) + 122,333 t (MBT) = 742,656 t < 900,000 tpa AWT / MBT – 80,267 t < 100,000 tpa Regional (road) – 71,597 t < 90,000 tpa¹ ¹ DPIE approved an increase in the limit to 90,000 tpa on 26/04/2018.</p> <p><u>2019 reporting period:</u> Sydney (rail) – 623,725 t (WB) + 136,653 t (MBT) = 760,378 t < 900,000 tpa AWT / MBT – 115,243 tpa > 100,000 tpa² Regional (road) – 111,443 tpa < 125,000 tpa³</p>	Non-compliant	NC1
Maximum waste input rates at the Landfill													
Putrescible waste received by rail from Sydney	900,000 tpa												
Received as residual waste from Woodlawn AWT	100,000 tpa												
Putrescible regional waste received by road	50,000 tpa												

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>Technology Project, December 2019 (2019 AEMR)</p> <ul style="list-style-type: none"> Annual Environmental Management Report 2019-20 For Woodlawn Waste Expansion Project & Woodlawn Alternative Waste Technology Project, December 2020 (2020 AEMR) PWS 2018 – Summary PWS 2019 – Summary PWS 2020 – Summary DPIE letter re. Veolia Woodlawn Bioreactor and Mechanical Biological Treatment Facility, Approval of Increase in Regional Waste Limits (MW 10_0012 and MP 	<p>² Non-compliance. The Auditors understand that due to regulatory instruction from the EPA in October 2018, the application of Mixed Waste Organic Outputs (MWOO) to land was no longer permitted and therefore, more output had to be disposed of to the Bioreactor.</p> <p>³ Non-compliance. DPIE approved an increase in the limit from 90,000 tpa to 125,000 tpa on 04/07/2019 “subject to further consultation with the Goulburn Mulwaree Council [GMC] to determine if a climbing lane [was] required for Tarago Road” (also referred to as Bungendore Road). DPIE required that “should a climbing lane be required, it must be constructed to the satisfaction of the [GMC] prior to the increase in acceptance of regional waste”. Veolia consulted GMC on 22/08/19 and GMC responded on 06/09/19 granting interim approval to increase the amount of regional waste on Tarago road by ~9,000 tpa to 45,000 tpa. GMC requested that the 2013 traffic assessment by ARRB be reviewed and updated and the report provided to GMC by 30/11/19. Veolia engaged ARRB to assess the need for a climbing lane, and a draft report was issued in March 2021. Based on the draft report, ARRB advised that a climbing lane was not considered necessary. There is no evidence that ARRB’s advice has been submitted to or accepted by GMC. Veolia accepted more than 90,000 tpa putrescible regional waste by road prior to</p>		

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>06_0239), 26/04/2018</p> <ul style="list-style-type: none"> DPIE letter re. Veolia Woodlawn Bioreactor, Approval of Increase in Regional Waste Limits (MW 10_0012), 04/07/2019 Veolia Letter to Goulburn Mulwaree Council, 22/08/2019 Goulburn Mulwaree Council Email to Veolia, Re. Veolia Woodlawn Bioreactor - Increase in regional waste limits & consideration for a climbing lane, 06/09/2019 ARRB, Letter to Veolia Re: Proposal for review of climbing lane requirements and traffic impact assessment, 21/08/2020 	<p>determining that the climbing lane was not required to the satisfaction of GMC.</p> <p><u>2020 reporting period:</u> Sydney (rail) – 630,575 t (WB) + 118,168 t (MBT) = 748,743 t < 900,000 tpa AWT / MBT – 100,782 t > 100,000 tpa⁴ Regional (road) – 142,753 t (207,208 – 64,455 t bushfire waste) > 125,000 tpa⁵</p> <p>⁴ Non-compliance due to increase in MWOO disposal, for the same reason as previous year. ⁵ Non-compliance, for the same reason as previous year.</p> <p>The Auditors observe that based on comparison of the AEMR data and the PWS Summary records, the reported figure of 142,753 t of regional waste received at the Bioreactor may include non-putrescible wastes. Based on the PWS Summary for 2020, the total putrescible regional waste may total in the order of 110,000 t. However, this still exceeds the approved limit of 90,000 tpa until such time as the climbing lane requirement is determined and accepted by GMC.</p> <p>The Auditors also observe that there is an inconsistency in references to regional waste and putrescible regional waste in PA 10-0012 which also requires clarification, as this impacts on assessment of compliance with limits.</p>		

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> ARRB, Road Safety and Traffic Assessment – Woodlawn Eco-Precinct, Tarago NSW, Draft Report, 16/03/21 	<p>There is also inconsistency between the putrescible regional waste limit for the Bioreactor approved by DPIE and EPL 11436, Condition L3.3 (90,000 tpa), although given the climbing lane issue, they may still be consistent. It is also noted that Condition 6 of this Schedule (i.e. 3.6) refers to a limit of 130,000 tpa for “regional waste” (not putrescible regional waste) received by road at the Landfill but that is not an approved limit. The Auditors assume that the Department intended the 125,000 tpa limit to apply to putrescible regional waste but this should be confirmed in writing.</p> <p>The Auditors recommend that Veolia confirm the quantities of putrescible regional waste received by the Bioreactor during the 2019 and 2020 reporting periods to determine if the approved limit of 90,000 tpa was exceeded.</p> <p>The Auditors recommend that Veolia investigate the causes for the confirmed limit exceedances and undertake appropriate corrective actions to prevent a reoccurrence.</p> <p>The Auditors recommend that Veolia confirm that GMC accept ARRB’s advice that the climbing lane is not considered necessary.</p>		
3.6	Prior to the receipt of more than 50,000 tpa of regional waste by road at the Landfill, the Proponent shall obtain approval in writing from the Director-General to vary the limit for the receipt of regional waste	<ul style="list-style-type: none"> DPIE letter re. Veolia Woodlawn Bioreactor and Mechanical 	DPIE approved an increase in the regional waste limit from 50,000 tpa to 90,000 tpa on 26/04/2018.	Refer to PA 10_0012, 3.5	Refer to NC1

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>not exceeding 130,000 tpa at the Landfill. Any such request must demonstrate to the satisfaction of the Director-General that the receipt of the additional regional waste from each LGA state or territory government:</p> <ul style="list-style-type: none"> would result in a net environmental benefit, including but not limited to: <ul style="list-style-type: none"> the permanent closure of a smaller municipal landfill facility with poor environmental performance; is not inconsistent with and would not undermine any resource recovery strategy, target/s or initiative of the source local, state or territory government; and would not significantly impact on the capacity of the Landfill and its primary purpose to accept waste from Sydney. <p>Note: this condition is linked to condition 3 in schedule 6 of this approval which restricts the haulage of regional waste by road to certain routes (see Appendix 4), unless otherwise approved by the Director-General.</p>	<ul style="list-style-type: none"> Biological Treatment Facility, Approval of Increase in Regional Waste Limits (MW 10_0012 and MP 06_0239), 26/04/2018 DPIE letter re. Veolia Woodlawn Bioreactor, Approval of Increase in Regional Waste Limits (MW 10_0012), 04/07/2019 Veolia Letter to Goulburn Mulwaree Council, 22/08/2019 ARRB, Letter to Veolia Re: Proposal for review of climbing lane requirements and traffic impact assessment, 21/08/2020 Goulburn Mulwaree Council Email to Veolia, Re. Veolia 	<p>DPIE approved an increase in the regional waste limit from 90,000 tpa to 125,000 tpa on 04/07/2019 subject to further consultation with the GMC on the need for a climbing lane on Tarago Road. Given that DPIE required that the climbing lane be constructed or closed out to the satisfaction of the Council prior to the increase in acceptance of regional waste, and there is no evidence that this issue has been closed out as required, the Auditors consider this Condition to be non-compliant</p> <p>The Auditors recommend that Veolia close out the traffic impact assessment to the satisfaction of the GMC.</p> <p>Given that this non-compliance finding and recommendation are duplicated in Condition 5, Schedule 3, the Auditors have not counted this as a separate non-compliance.</p>		

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		Woodlawn Bioreactor - Increase in regional waste limits & consideration for a climbing lane, 06/09/2019			
3.7	In any event, no more than 1.13 million tpa of waste shall be accepted at the Landfill.	<ul style="list-style-type: none"> • 2018 AEMR • 2019 AEMR • 2020 AEMR • PWS 2018 – Summary • PWS 2019 – Summary • PWS 2020 – Summary 	Based on the AEMR and PWS information, the total volume of waste accepted at the Landfill was <1.13 tpa during the Audit Period.	Compliant	
3.7A	Irrespective of conditions 5, 6 and 7 of Schedule 3, the Proponent may receive up to 200,000 cubic metres of bushfire impacted waste material from regional areas of NSW between March and September 2020, unless otherwise agreed to in writing by the Planning Secretary. The regional waste received from bushfire impacted areas is to be excluded from the maximum annual input rates in conditions 5, 6 and 7 of Schedule 2. <i>Note: Road maintenance contributions outlined in Condition 10 of Schedule 6 also applies to the bushfire impacted waste referred to in Condition 7A above.</i>	<ul style="list-style-type: none"> • 2020 AEMR • PWS 2020 – Summary • Bushfire PWS Monthly Reports up to February 2021 • DPIE letter re. Woodlawn Waste Management Facility (SSD 10_0012), Request for Extension to Receive Bushfire Waste 15/10/2020 	Based on the AEMR and PWS information, the total net weight (tonnes) of bushfire impacted waste material from regional areas of NSW between March 2020 and February 2021, as agreed in writing by DPIE, was estimated by the Auditors to be approximately 70,164 tonnes. We do not know the bulking factor for the bushfire impacted waste material but consider it unlikely that the 200,000 m ³ limit would have been exceeded.	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012						
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #	
Crisps Creek IMF						
3.8	The Proponent shall not exceed the annual throughput rates in Table 2 for the Crisps Creek IMF.	<ul style="list-style-type: none">2018 AEMR2019 AEMR2020 AEMRInterview with Marea Rakete, Veolia, 26/03/21	Based on the AEMR information, the total tonnes of waste received by the AWT via the IMF annually was <280,000 tpa during the Audit Period. Veolia advised that Crisps Creek IMF has yet to receive waste from the Solid Recovered Fuel (SRF) facility for transporting to Port Kembla or Port Botany and therefore, that limit has not been triggered.	Compliant		
	Refer to table in Approval-MOD3					
	Maximum waste throughput rates at the Crisps Creek IMF					
	Received by rail from Sydney					900,000 tpa
	Received by rail from Sydney for processing at the Woodlawn AWT					280,000 tpa
Received by road from SRF facility for transporting to Port Kembla or Port Botany	37,400 tpa					
STRUCTURAL ADEQUACY						
3.9	The Proponent shall ensure that 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. Notes: Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.	<ul style="list-style-type: none">Philip Chun, Occupation Certificate No. 18-210365oc1, 07/04/2021LandTeam letter to Goulburn Mulwaree Council, Re: Proposed increase in electricity generating capacity at Lot 2 in DP 1179305 - Woodlawn Bioreactor Power Station site. 609 Collector Rd, Tarago, 30/06/2020	Construction of the Leachate Treatment Plant (LTP) was completed during the Audit Period. A construction certificate was issued and reviewed for the previous Audit Period. An occupation certificate was issued by the Principal Certifying Authority on 07/04/2021, which is outside this Audit Period. Given that the LTP was commissioned in October 2018, it appears that the LTP was occupied before the occupation certificate was obtained, which is considered to represent a non-compliance. Veolia’s planning consultant, LandTeam, have consulted DPIE and Goulburn Mulwaree Council on the need for a development application (DA) for proposed expansion of the Woodlawn Bio Energy Power Station. They obtained development consent from Council for preparatory earthworks (DA/0322/1920.	Non-compliant	NC2	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> Goulburn Mulwaree Council Letter to LandTeam, Notice of Determination of a Development Consent, DA/0322/1920, 17/07/2020 Veolia letter to LandTeam, Re. Construction Certificate Application, Proposed Woodlawn Earthworks Power Station, Lot 2 DP 1179305, 619 Collector Road Tarago, Parish of Werriwal County of Murray, 15/09/2020 Completed form, Appointment of Council as Principal Certifying Authority (PCA) & Contract for Council to Undertake Certification Work, not dated 	<p>17/07/2020) and submitted a construction certificate application on 15/09/2020. We understand Council have yet to provide the construction certificate. The proposed expansion of the Power Station work appears to be compliant with this Condition.</p> <p>The occupation certificate has been obtained, therefore no recommendation has been provided.</p>		
TRANSITIONAL ARRANGEMENTS					

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
3.10	This approval does not affect the rights or obligations under DA No. 31-02-99 except in the event of any inconsistency between DA No. 31-02-99 and this approval, this approval shall prevail.		Noted		
3.11	The Proponent shall ensure that the receipt of waste at the Landfill is restricted to 500,000 tpa until all conditions of this approval relating to the commencement of expanded operations have been satisfied.		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
3.12	All existing environmental management plans that apply to the site under DA No. 31-02-99 shall continue to be fully applied until replaced under this approval.	<ul style="list-style-type: none"> DPIE letter re. Woodlawn Bioreactor, Landfill Environmental Management Plan (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 	The Auditors observe that all of the procedures that applied under DA No. 31-02-99 continue to be used by Veolia. The updated 2018 LEMP was approved by the DPIE on 18/09/2018.	Compliant	
DEMOLITION					
3.13	The Proponent shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	No demolition has occurred during the Audit Period.	Not Triggered	
OPERATION OF PLANT AND EQUIPMENT					
3.14	The Proponent shall ensure that all plant and equipment used for the Project is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	<ul style="list-style-type: none"> 2018 LEMP Veolia, WL – Bioreactor Infrastructure Plan (WIP) 2020, 13/10/2020 	The LTP Initial Maintenance Schedule is provided in the LEMP. Woodlawn has a 'supervisory control and data acquisition' (SCADA) system, which monitors the performance in real-time of a number of systems (e.g. gas extraction, stormwater, water supply pump, air, gas monitoring in the void,	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
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		<ul style="list-style-type: none"> Rivo Report - Environmental Incidents 2018-2021.xlsx 	evaporation) and has automated alarms that facilitate early identification and maintenance of equipment failures or other issues. An example of this was an incident on 05/07/20 when an alarm was activated overnight due to a slow leak filling up a bund.		
STAGED SUBMISSION OF PLANS OR PROGRAMS					
3.15	With the approval of the Director-General, the Proponent may submit any plan or program required by this approval on a progressive basis.			Not Triggered	
COMPLIANCE					
3.16	The Proponent must assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedules 3, 4, 5 and 6. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Proponent must, at the earliest opportunity: a) take all reasonable and feasible steps to bring the operation back into compliance; b) ensure that the exceedance does not recur; c) consider all reasonable and feasible options for remediation (where relevant) and how to prevent a recurrence and submit a report to the Department describing those options and any preferred	<ul style="list-style-type: none"> 2018 AEMR 2019 AEMR 2020 AEMR 	As found in relation to Schedule 3, Condition 5, waste volume limits were exceeded during the reporting period. The Auditors observe that the limit for receipt of MBT waste was exceeded two years in a row indicating that corrective actions were not successful in preventing a reoccurrence. Given that this non-compliance finding and recommendation are duplicated in Condition 5, Schedule 3, the Auditors have not counted this as a separate non-compliance.	Refer to PA 10_0012, 3.5	Refer to NC1

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	remediation measures or other course of action; and d) implement remediation and prevention measures as directed by the Director-General, to the satisfaction of the Director-General.				
SCHEDULE 4. SPECIFIC ENVIRONMENTAL CONDITIONS – LANDFILL SITE					
WASTE MANAGEMENT					
<u>Restrictions of the Receipt, Storage, Handling and Disposal of Waste</u>					
4.1	The Proponent shall only receive waste on site that is authorised for receipt by an EPL.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	All waste received at the Bioreactor during this reporting period was in accordance with the waste types permitted in the EPL. Waste generated onsite was deposited in the Bioreactor. Refer to EPL 11436, Condition L3.1.	Compliant	
Cover Material					
4.2	The Proponent shall ensure that all waste cover material used on site is virgin excavated natural material and/or alternative daily cover, as approved in writing by the OEH.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 PWS 2018 – Summary PWS 2019 – Summary PWS 2020 – Summary The Odour Unit (TOU), Alternative Daily Cover – Odour 	Veolia has documented that cover material was sourced from the surrounding areas including from Canberra Concrete Recyclers, Denrith and Common Street Recycling for use as daily cover. Additional material was stockpiled onsite. A VENM certificate from Denrith Pty Ltd was provided for material obtained from Reynold Pit. The Auditors observe that the address of Reynolds Pit is not provided and the certificate does not provide photographs or other evidence demonstrating that the material is in fact VENM. The Auditors recommend as an opportunity for improvement that Veolia obtain further evidence to support	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>Trial Study, December 2020</p> <ul style="list-style-type: none"> Denrith Pty Ltd (trading as Divall's Earthmoving & Bulk Haulage) Letter to Veolia, Re: Letter of VENM Material, 12/04/21 	<p>claims that material imported to site as waste cover material is VENM.</p> <p>Veolia conducted a trial using an Alternative Daily Cover (ADC) on the Woodlawn Bioreactor in accordance with EPL 11436 Conditions O6.30-O6.32. Veolia have sought EPA approval to use Mixed Waste Organic Output (MWO) from the Woodlawn Mechanical Biological Treatment (MBT) Facility as the ADC to virgin excavated natural material (VENM). The EPA has yet to approve MWO as an ADC.</p>		
Litter Control					
4.3	<p>The Proponent shall:</p> <p>(a) implement suitable measures to prevent the unnecessary proliferation of litter both on and off site, including the installation and maintenance of a mesh fence of not less than 1.8 metres high around the landfill; and</p> <p>(b) inspect daily and clear the site (and if necessary, surrounding area) of litter on at least a weekly basis.</p>	<ul style="list-style-type: none"> Site visit and interview with Veolia personnel on 17/03/2021 	<p>The facility is maintained in good condition, with no litter observed beyond the landfill during the site visit. Veolia advised that they continually look for litter when they travel to and from work along Collector Road and then inside the facility during the conduct of their work.</p>	Compliant	
AIR					
Landfill Gas Limits – Woodlawn Bioreactor					
4.4	<p>The Proponent shall ensure that landfill gas engine (LGE) emissions at the Bioreactor comply with the requirements of the <i>POEO (Clean Air) Regulation 2010</i>.</p>	<ul style="list-style-type: none"> Ektimo Pty Ltd, Emission Testing Report, Report Numbers R006204, R008159 and R009352, 08/10/18, 30/09/19 	<p>Results of annual monitoring of LGE emissions by Ektimo show compliance with concentration limits.</p> <p>Note, the VOC destruction efficiency requirement is not a requirement of the <i>POEO (Clean Air) Regulation 2010</i>.</p>	Compliant	

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		and 30/09/20, respectively			
Greenhouse Gas					
4.5	The Proponent shall implement all reasonable and feasible measures to minimise: (a) energy use on site; and (b) the greenhouse gas emissions produced on site, to the satisfaction of the Director-General	<ul style="list-style-type: none"> • 2018 AEMR • 2019 AEMR • 2020 AEMR 	Veolia continued to extract landfill gas / methane, a greenhouse gas (GHG), to generate electricity, a form of renewable energy, at the onsite Woodlawn Bio Energy Power Station. The power station supplies electricity to the electricity grid. A 2.3 MW Solar Farm was commissioned in June 2019 to supply the electricity requirements of the Woodlawn MBT Facility with excess electricity to be used by the Woodlawn Bioreactor operations. A Leachate Treatment Plant (LTP) was commissioned in October 2018 and it was designed to enable more efficient landfill gas extraction, thus further reducing GHG emissions.	Compliant	
Odour					
Discharge Limits					
4.6	The Proponent shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the POEO Act.	<ul style="list-style-type: none"> • TOU, Woodlawn Bioreactor Expansion Project – Independent Odour Audit #7, 25/07/2019 (2019 IOA) • TOU, Woodlawn Bioreactor Expansion Project – Independent Odour Audit #8, 	The Auditors did not note the presence of offensive odour either within Tarago village, at the IMF or at the entry to the Woodlawn site. The Auditors acknowledge that conditions may have been favourable on the day of the site visit. The majority of the complaints received at the site relate to odour (three Road Traffic exceptions). Based on the Woodlawn Bioreactor Complaints Register (08/02/2018 – 08/03/2021) and the 2018 to 2020 EPL 11436 Annual Returns, the number of odour related community complaints	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>12/10/2020 (2020 IOA)</p> <ul style="list-style-type: none"> • Site visit on 17/03/2021 • Woodlawn Bioreactor Complaints Register • 2018 AEMR • 2019 AEMR • 2020 AEMR • EPL 11436 Annual Return, 06/09/17 – 05/09/18 (2018 EPL 11436 Annual Return) • EPL 11436 Annual Return, 06/09/18-05/09/19 (2019 EPL 11436 Annual Return) • EPL 11436 Annual Return, 06/09/19 – 05/09/20 (2020 EPL 11436 Annual Return) 	<p>have steadily decreased during the Audit Period from 41 in the 2018 EPL reporting period to 20 in the 2020 EPL reporting period, which represents a 50% reduction, most likely due to the operation of the LTP.</p> <p>Whilst odour continues to be an issue, the Auditors consider this Condition to be compliant on the basis that no odour was detected during the site visit and Veolia have achieved a significant reduction in the number of odour complaints during the Audit Period.</p>		
Independent Odour Audit					
4.7	Within 3 months of the date of this project approval, and annually thereafter, unless otherwise agreed to by the Director-General pursuant to Condition 8 of this Schedule, the Proponent shall commission and pay the full cost of an Independent Odour Audit	<ul style="list-style-type: none"> • 2019 IOA • 2020 IOA • Department Letter to Veolia, Re: Woodlawn 	Two IOAs have been conducted by The Odour Unit (TOU) during the Audit Period with sampling conducted in February of 2019 and 2020. The IOA reports generally comply with the approval conditions with the following exceptions:	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>of the project. This audit must be conducted by a suitably qualified, experienced and independent expert whose appointment has been endorsed by the Director-General. During the audit, this expert must:</p> <p>(a) consult with OEH and the Department;</p> <p>(b) audit the effectiveness of the odour controls on site in regard to protecting receivers against offensive odour;</p> <p>(c) review the Proponent's production data (that are relevant to the odour audit) and complaint records;</p> <p>(d) review the relevant odour sections of the Air Quality and Greenhouse Gas Management Plan for the project and assess the effectiveness of the odour controls;</p> <p>(e) measure all key odour sources on site including:</p> <p>i. consideration of wet weather conditions providing all raw sampling data used in this analysis;</p> <p>ii. consideration of (but not limited to) all liquid storage areas, active tipping faces, waste cover area, aged waste areas and recirculation of leachate onto waste in the void; and</p> <p>iii. a comparison of the results of these measurements against the predictions in the EA;</p> <p>(f) determine whether the project is complying with the requirements in this approval to protect receivers against offensive odour;</p> <p>(g) outline all reasonable and feasible measures (including a cost/benefit analysis,</p>	<p>Bioreactor Expansion Project PA 10_0012), Independent Odour Audit 2019/20, not dated.</p>	<ul style="list-style-type: none"> TOU reviewed the various odour controls utilised but, as observed in the previous IEA, the Auditors observe that the mitigation controls were not assessed for their effectiveness to protect receivers against offensive odour. The Auditors acknowledge that this may be difficult as it may not be feasible to differentiate between the impact of individual odour controls at receivers. The Auditors observe that dispersion modelling was conducted for the 2019 and 2020 IOAs and found that predicted ground level concentrations during normal operations as at the time of the IOAs were well below the NSW EPA odour IAC. The review of odour complaint records appeared to consist of confirming that complaints were being recorded in accordance with EPL requirements, a comparison of the number of complaints relative to the previous IOA, and Veolia's logged responses. As previously observed in the 2018 IEA, the 2018 IOA recommended that Veolia refine their investigation of odour issues in the community but the 2019 IOA found that the "logged odour complaints data continue to not assist in identifying the nature or likely source of the problematic odours", which is not satisfactory. Furthermore, the Department in their consultation requirements, specifically required the IOA to 		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	if required) that may be required to improve odour control at the site; and (h) recommend and prioritise (mandatory and non-mandatory) recommendations for their implementation.		<p>conduct a detailed analysis of the odour complaints but this was not attempted by TOU. The Auditors acknowledge that the published complaint register records do not assist with this endeavour as they do not record prevailing wind conditions or operating conditions at the time of the complaint. But the odour complaint response reports provided by Veolia to the EPA do provide more information. TOU could also have obtained the meteorological data and operational data for the purpose of the analysis, and considered which residents were making the complaints in their analysis. TOU recommended (non-mandatory) that Veolia refine its investigation methods to possibly include "potential odour transport pathways; undertaking of field odour surveys; assess the topography of surrounding land; analysis of climatic data; and a detailed review of odour complaint data". However, there appears to have been no change in odour complaint investigation records or data analysis by TOU in the 2020 IOA.</p> <ul style="list-style-type: none"> No measurement of aged waste areas and recirculation of leachate onto waste in the void, as sources of odour, appears to have been undertaken although the 2020 IOA indicates that leachate recirculation had 		

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			<p>stopped and would only be used as a contingency measure.</p> <p>The Department indicated in a letter to Veolia (not dated) that the Department considered the 2020 IOA "to generally satisfy the requirement of the approval in relation to the Schedule 4 Condition 7 of the approval. Please note that approval of this IOA is not endorsement of the compliance status of the project". This condition is considered compliant on the basis of the Department's approval of the 2020 IOA.</p> <p>The Auditors recommend as an opportunity for improvement that a detailed odour complaint analysis be conducted for the next IOA that includes an assessment of environmental parameters, LTP operational conditions and consideration of the complainants, as per the Department's consultation requirement. The Auditors also suggest that the Independent Odour Auditor avoid making generic recommendations. If the Auditor is satisfied that Veolia's actions are appropriate then there may be no need to make a recommendation.</p>		
4.8	The Director-General may vary the frequency of the audit after 5 years depending on the performance of the project and demonstrated compliance with Condition 6 of Schedule 4. This condition is linked to condition 9 in Schedule 5.			Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
4.9	Within 6 weeks of the completion of an odour audit, the Proponent shall submit a copy of the audit report to both OEH and the Department with a response to any recommendations contained in the audit report.	<ul style="list-style-type: none"> 2019 IOA 2020 IOA Department Letter to Veolia, Re: Woodlawn Bioreactor Expansion Project PA 10_0012), Independent Odour Audit 2018, 28/08/19 Veolia Email to EPA, Re: Independent Odour Audit #8 Report 2020, 15/10/2020 Veolia Letter to EPA, with attached 2020 IOA, 15/10/2020 Veolia Letter to the NSW Department of Planning & Environment, with attached 2020 IOA, 15/10/2020 Department Email to Veolia, Re: Woodlawn Bioreactor Expansion - Post 	<p>The 2019 IOA report was issued on 25/07/2021. A letter from the Department indicates it was submitted to the Department a day later on 26/07/19. It does not mention whether the response was also submitted to the Department with the IOA report. Veolia could not provide similar correspondence showing that the 2019 IOA was submitted to the EPA.</p> <p>The 2020 IOA report was issued on 12/10/2020 and submitted to the EPA and the Department on the same day, 15/10/2020.</p> <p>Veolia's response to the 2020 IOA was provided in the cover letter for the 2020 IOA report to both the Department and the EPA.</p> <p>Based on the above, and usually consistent submission of reports to the Department and EPA, the Auditors consider it likely that the 2019 IOA and response were in fact submitted correctly to the EPA and the Department within the required timeframe. On this basis, this Condition is considered compliant.</p> <p>The Auditors recommend as an opportunity for improvement that Veolia confirm that the 2019 IOA and response were submitted to both the Department and the EPA.</p>	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>Approval Document Received - (MP10_0012-PA-6), 15/10/2020</p> <ul style="list-style-type: none"> Department Letter to Veolia, Re: Woodlawn Bioreactor Expansion Project PA 10_0012), Independent Odour Audit 2019/20, not dated. 			
4.10	<p>Unless otherwise directed by the Planning Secretary, the Proponent shall implement all the mandatory odour controls and recommendations of any Independent Odour Audit/s. Recommendations of the preceding Independent Odour Audit/s required under this approval shall be implemented prior to the commencement of expanded operations.</p> <p>This audit must be documented in the Landfill EMP (see condition 3 in schedule 7).</p>	<ul style="list-style-type: none"> 2018 LEMP Veolia, Air Quality and Greenhouse Gas Management Plan For Woodlawn Bioreactor, Final Draft, 24/07/2018 (2018 AQGGMP) Interview with Veolia personnel, 17/03/2021 	<p>Veolia advised that the mandatory recommendations were generic and non-specific and therefore, no specific new actions were required. The Auditors observe and concur that all of the mandatory recommendations were to "continue to ..." do what Veolia were already doing in relation to managing landfill gas capture, leachate and the active tipping face. The Auditors also observe that the mandatory recommendations for 2019 and 2020 did not change substantially.</p> <p>The IOA requirement is documented in the LEMP and AQGGMP.</p> <p>On the basis that the IOAs did not make specific mandatory new recommendations and that Veolia are continuing to make improvements in managing landfill gas capture, leachate and the</p>	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012																												
Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	NC #																							
			active tipping face, this Condition is considered compliant.																									
Dust Limits																												
4.11	<p>The Proponent shall ensure that dust generated by the project does not exceed the criteria listed in Tables 3 to 5 at any private residential receiver, or on more than 25 percent of any privately owned land surrounding the site.</p> <p><i>Refer to table in Approval</i></p> <p><small>Table 3: Long term criteria for particulate matter</small></p> <table><tr><th>Pollutant</th><th>Averaging period</th><th>^dCriterion</th></tr><tr><td>Total suspended particulate (TSP) matter</td><td>Annual</td><td>^a90 µg/m³</td></tr><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>Annual</td><td>^a30 µg/m³</td></tr></table> <p><small>Table 4: Short term criterion for particulate matter</small></p> <table><tr><th>Pollutant</th><th>Averaging period</th><th>^d Criterion</th></tr><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>24 hour</td><td>^a 50 µg/m³</td></tr></table> <p><small>Table 5: Long term criteria for deposited dust</small></p> <table><tr><th>Pollutant</th><th>Averaging period</th><th>Maximum increase in deposited dust level</th><th>Maximum total deposited dust level</th></tr><tr><td>^cDeposited dust</td><td>Annual</td><td>^b2 g/m²/month</td><td>^a4 g/m²/month</td></tr></table> <p><small>Notes for Tables 3-5:</small></p> <ul style="list-style-type: none">^a Total impact (i.e. incremental increase in concentrations due to the project plus background concentrations due to other sources);^b Incremental impact (i.e. incremental increase in concentrations due to the project on its own);^c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003, Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method; and^d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agree to by the Director-General in consultation with OEH.	Pollutant	Averaging period	^d Criterion	Total suspended particulate (TSP) matter	Annual	^a 90 µg/m ³	Particulate matter < 10 µm (PM ₁₀)	Annual	^a 30 µg/m ³	Pollutant	Averaging period	^d Criterion	Particulate matter < 10 µm (PM ₁₀)	24 hour	^a 50 µg/m ³	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level	^c Deposited dust	Annual	^b 2 g/m ² /month	^a 4 g/m ² /month	<ul style="list-style-type: none">2018 AEMR2019 AEMR2020 AEMRDepositional Dust.xlsxDPIE, DustWatch Reports, https://www.environment.nsw.gov.au/topics/land-and-soil/soil-degradation/wind-erosion/community-dustwatch/dustwatch-publications	<p>The Auditors did not observe dust being generated at the bioreactor site during the site visit, particularly due to the wet weather conditions.</p> <p>The AEMRs indicate that average Deposited dust (as Insoluble solids) levels exceeded the criterion for maximum total deposited dust level (4 g/m²/month) in the 2019 and 2020 reporting periods at all three dust gauges. The AEMRs indicate that the higher levels of dust were due to the dry year (i.e. drought), dust storms and then the 2020 bushfires.</p> <p>The Auditors observe that there have been periodic exceedances throughout the Audit Period (e.g. Aug-18, Oct-18 to May-19, Sep-19 to Apr-20) and that the results are not always consistent between the three dust gauge locations, potentially indicating localised influences related to operational activities. However, publicly available data (DustWatch Reports) supports Veolia’s claim that dust air quality was generally poor during the Audit Period due to a combination factors including widespread drought, high winds, dust storms and bushfires. On the basis of the DustWatch Report information, the Auditors accept Veolia’s claim that the data was influenced by “extraordinary events” and therefore, is considered compliant.</p>	Compliant	
Pollutant	Averaging period	^d Criterion																										
Total suspended particulate (TSP) matter	Annual	^a 90 µg/m ³																										
Particulate matter < 10 µm (PM ₁₀)	Annual	^a 30 µg/m ³																										
Pollutant	Averaging period	^d Criterion																										
Particulate matter < 10 µm (PM ₁₀)	24 hour	^a 50 µg/m ³																										
Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level																									
^c Deposited dust	Annual	^b 2 g/m ² /month	^a 4 g/m ² /month																									

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			<p>The Auditors observe that the available tabulated data do not record "extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agree to by the [Department] in consultation with [EPA]" for the purpose of excluding elevated data linked to extraordinary events.</p> <p>The Auditors recommend that observations of extraordinary events be recorded in sampling field records and in the data spreadsheet with appropriate evidence so that results impacted by such events may be excluded (evidence based) from the average calculation.</p>		
Air Quality Monitoring, Management and Validation					
4.12	<p>The Proponent shall prepare and implement an Air Quality and Greenhouse Gas Management Plan for the Landfill to the satisfaction of the Director-General. This plan must:</p> <p>(a) be prepared in consultation with OEH by a suitably qualified and experienced expert whose appointment has been endorsed by the Director-General;</p> <p>(b) be approved by the Director-General prior to the commencement of expanded operations;</p> <p>(c) describe in detail the measures that would be implemented on site to manage the air quality (particularly odour) and greenhouse gas impacts of the project to ensure compliance with this approval and other relevant statutory controls;</p> <p>(d) include a program for monitoring the air quality impacts of the project, in particular:</p>	<ul style="list-style-type: none"> 2018 AQGGMP DPIE letter Re. Woodlawn Bioreactor, Landfill Environmental Management Plan, (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 Interview with Veolia personnel, 17/03/2021 	<p>This Condition was previously assessed and, therefore, largely not triggered in this Audit Period.</p> <p>However, it is observed that Veolia issued a final draft Air Quality and Greenhouse Gas Management Plan (AQGGMP) in July 2018. The Auditors assume that the AQGGMP was submitted to the Department as an appendix to the LEMP. However, based on the Department's letter dated 18/09/18, the revised AQGGMP was not approved by the Department.</p> <p>Whilst the AQGGMP indicates that mandatory recommendations from the IOAs have been or are in the process of being implemented, Veolia advised that the AQGGMP was not revised as the</p>	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
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	<ul style="list-style-type: none"> LGE specifications and monitoring of LGE emissions against the requirements of the <i>POEO (Clean Air) Regulation 2010</i> including measures that would be taken to ensure compliance with this regulation; (e) be revised to consider mandatory odour controls and recommendations of any Independent Odour Audit required by this approval; and (f) detail the remedial actions to be taken in the event that a non-compliance is identified. <p>This plan must be documented in the Landfill EMP (see condition 3 in schedule 7).</p>		<p>mandatory recommendations were fairly generic (e.g. continue to improve landfill gas capture) and not specific such that it required the AQGGMP to be revised. Given the nature of the mandatory recommendations, this approach appears reasonable.</p> <p>The AQGGMP is documented in the 2018 revised LEMP.</p>		
SOIL AND WATER					
Pollution of Waters					
4.13	Except as may be expressly provided in the EPL for the site, the Proponent shall comply with Section 120 of the POEO Act.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 2020 EPL 11436 Annual Return 	<p>Site personnel advised that monitoring and maintaining freeboard in the various dams is a primary control measure for preventing overflows and potential water pollution. Monitoring of surface and groundwater is conducted in accordance with the LEMP, although based on the EPL Annual Returns, there were periods where surface water samples could not be collected due to insufficient water to sample.</p> <p>There is no evidence to suggest that Veolia have not complied with Section 120 of the POEO Act.</p>	Compliant	
Soil					
4.14	The Proponent shall: (a) minimise any soil loss through erosion on site;	<ul style="list-style-type: none"> Soil and Water Management Plan For Woodlawn 	These measures are undertaken with implementation of the Soil and Water Management Plan.	Compliant	

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	(b) where possible, set aside any topsoil won on site for the proposed revegetation and rehabilitation of the site; and (c) ensure that any topsoil stockpiles on site are suitably managed to ensure that the topsoil in these stockpiles can be beneficially used in the proposed revegetation and rehabilitation of the site.	Bioreactor, Final, 07/09/2018 (2018 SWMP) • Drone aerial photographs of the topsoil stockpiles (not dated)	Drone photographs sighted showing segregation of topsoil in a large stockpile.		
Bunding					
4.15	The Proponent shall store all chemicals, fuels and oils used on site in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund, unless double-skinned tanks are used. Any bunds shall be designed and installed in accordance with the requirements of all relevant Australian Standards, and/or OEH's Environmental Protection Manual: <i>Technical Bulletin Bunding and Spill Management</i> .	<ul style="list-style-type: none"> Site inspection, 17/03/2021 Costin Roe Consulting, Civil Works Plan, C012424.02-C40, Issue 2, 21/02/2018 Veolia, NSW Woodlawn – Eco-Precinct Emergency Response Plan (Incorporating the Pollution Incident Response Management Plan), 15/09/2020 (2020 ERP) 	The Emergency Response Plans (ERPs) for the Woodlawn Bioreactor Eco-Precinct and the Crisps Creek IMF include a Pollutants Inventory, being a list of dangerous goods and hazardous chemicals. Included, for example, is a 70,800 L capacity, double skinned Diesel tank. The LTP has a number of tanks including a 55,000 L capacity Methanol tank and a 20,000 L Sodium Hydroxide tank. The tank with the largest capacity is a 1.8 ML leachate tank (DGT3). The LTP tanks are contained in a bund with a reported capacity of 2.75 ML, which is >110% of the largest tank. Small volumes of chemicals were observed stored on pallet bunds undercover (in the forklift car ports) at the Crisp Creek IMF.	Compliant	
Erosion and Sediment Control					
4.16	During the construction, the Proponent shall implement suitable erosion and sediment control measures on site, in accordance with the relevant requirements		This Condition applied during construction of the development and is therefore, no longer applicable.	Not triggered	

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	in the latest version of the <i>Managing Urban Stormwater: Soils and Construction guideline</i> .				
Soil and Water Management Plan					
4.17	<p>The Proponent shall prepare and implement a Soil & Water Management Plan for the Landfill to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared in consultation with EPA, Water NSW and DoL L&W by a suitably qualified and experienced expert whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) be approved by the Planning Secretary prior to the commencement of expanded operations;</p> <p>(c) must specifically consider soil and water management (including leachate management) at the Landfill and ED3N, ED3S, ED3S-S, ED2, coffer dam(s) and ED1;</p> <p>(d) include a water balance for the project;</p> <p>(e) include a surface water monitoring program;</p> <p>(f) include a groundwater monitoring program; and</p> <p>(g) ensure that suitable measures are implemented to minimise water use, control soil erosion, prevent groundwater contamination, and comply with any surface water discharge limits.</p> <p>This plan must be documented in the Landfill EMP (see condition 3 in schedule 7).</p>	<ul style="list-style-type: none"> 2018 SWMP 2018 LEMP DPIE letter Re. Woodlawn Bioreactor, Landfill Environmental Management Plan, (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 	<p>This Condition was previously assessed and, therefore, largely not triggered in this Audit Period.</p> <p>However, it is observed that Veolia issued a final Soil and Water Management Plan (SWMP) in September 2018, which was approved by DPIE on 18/09/2018.</p> <p>A revised water balance (WSP Letter Email to Veolia, Re. Leachate management by mechanical evaporators and the proposed ED1 coffer dam, 28 September 2017) was included in Appendix D of the 2018 SWMP.</p> <p>The SWMP is documented in the 2018 revised LEMP.</p>	Compliant	
4.17A	The Proponent shall update the Soil and Water Management Plan for the landfill by including the proposed changes to water	<ul style="list-style-type: none"> 2018 SWMP 	The SWMP was revised in 2018 to the satisfaction of the Department prior to operation of the LTP.	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	and leachate management in MOD 1 and MOD2. The Plan shall be prepared in accordance with the requirements of Condition 17, in consultation with Water NSW and the EPA to the satisfaction of the Planning Secretary. Prior to operation of the LTP or as otherwise agreed by the Planning Secretary, the Proponent must submit a Soil and Water Management Plan to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> • Veolia email to DPIE, cc to EPA and Water NSW, Re. Woodlawn Bioreactor Revised Management Plans, 24/03/2017, with attached 'Condition Compliance Report March 2017.pdf' and 'Reference Table for Comments.docx' • Veolia email to DPIE, Subject: Email 1- Revised LEMP, LMP and SWMP -Woodlawn Bioreactor, 25/07/2018 • DPIE email to Veolia, Subject: Woodlawn Long-term leachate management LEMP LMP EPA Comments, 17/08/2018 • EPA Letter to DPIE, Re. Review of proposed updates 	Evidence of consultation with EPA and Water NSW was available.		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>to Woodlawn Bioreactor Environmental Management Plans, 16/08/2018</p> <ul style="list-style-type: none"> DPIE letter Re. Woodlawn Bioreactor, Landfill Environmental Management Plan, (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 			
Leachate Management					
4.18	<p>The Proponent shall prepare and implement a Leachate Management Plan for the Landfill to the satisfaction of the Planning Secretary. This plan must:</p> <p>(a) be prepared in consultation with EPA, Water NSW and DoI L&W by a suitably qualified and experienced expert whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) be approved by Planning Secretary prior to the commencement of expanded operations;</p> <p>(c) describe in the detail the leachate barrier system installed on site;</p> <p>(d) detail measures to collect and store all leachate generated by the landfill;</p> <p>(e) detail measures to prevent leachate from escaping to surface water, groundwater or the surrounding subsoils;</p>	<ul style="list-style-type: none"> Veolia, Leachate Management Plan For Woodlawn Bioreactor, Final, 30/08/2018 (2018 LMP) 2018 LEMP DPIE letter Re. Woodlawn Bioreactor, Landfill Environmental Management Plan, (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 	<p>This Condition was previously assessed and, therefore, largely not triggered in this Audit Period.</p> <p>However, it is observed that Veolia issued a final Leachate Management Plan (LMP) in August 2018, which was approved by DPIE on 18/09/2018.</p> <p>The LMP is documented in the 2018 revised LEMP.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(f) ensure all surface water from areas not subject to waste disposal or leachate disposal is directed away from the leachate management system; (g) treat all water that has entered areas filled with waste, or been contaminated by leachate, as leachate; (h) detail the management measures for the LTP, pipeline and coffer dam(s); and (i) detail how the LTP would be managed during an emergency or system failure. This plan must be documented in the Landfill EMP (see condition 3 in schedule 7).				
4.18A	The Proponent shall update the Leachate Management Plan for the landfill by including the proposed changes to water and leachate management in MOD 1 and MOD2. The Plan shall be prepared in accordance with the requirements of Condition 18, in consultation with Water NSW and the EPA to the satisfaction of the Planning Secretary. Prior to operation of the LTP or as otherwise agreed by the Planning Secretary, the Proponent must submit a revised Leachate Management Plan to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> 2019 AEMR 2018 LMP Veolia email to DPIE, cc to EPA and Water NSW, Re. Woodlawn Bioreactor Revised Management Plans, 24/03/2017, with attached 'Condition Compliance Report March 2017.pdf' and 'Reference Table for Comments.docx' Veolia email to DPIE, Subject: Email 1- Revised LEMP, LMP and SWMP -Woodlawn 	Based on the 2019 AEMR, the LTP was commissioned on 04/10/2018 and the revised LMP was issued on 30/08/2018 to the satisfaction of the Department. Evidence of consultation with EPA and Water NSW was available.	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		Bioreactor, 25/07/2018 <ul style="list-style-type: none"> Email from DPIE to Veolia, Subject: Woodlawn Long-term leachate management LEMP LMP EPA Comments, 17/08/2018 EPA Letter to DPIE, Re. Review of proposed updates to Woodlawn Bioreactor Environmental Management Plans, 16/08/2018 DPIE letter Re. Woodlawn Bioreactor, Landfill Environmental Management Plan, (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 			
Coffer Dam(s)					
4.18AA	Should any additional coffer dam(s) in ED1 be required, the Applicant must submit revised management plans in accordance	<ul style="list-style-type: none"> 2019 AEMR 2018 LMP 	Based on the 2019 AEMR, the LTP started discharging permeate (i.e. treated leachate) from the LTP to the ED1 coffer dam on 29/04/2019.	Refer to PA 10_0012,	


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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	with conditions 17 and 18 to the satisfaction of the Planning Secretary prior to any treated leachate being discharged to the coffer dam(s). The plans must be prepared in consultation with the EPA and Water NSW and be documented in the Landfill EMP.	<ul style="list-style-type: none"> DPIE letter Re. Woodlawn Bioreactor, Landfill Environmental Management Plan, (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 	The LMP was revised in 2018 to the satisfaction of the Department, which was prior to treated leachate being discharged to the ED1 coffer dam. Evidence of consultation with EPA and Water NSW was available.	4.17A & 4.18A	
4.18B	<p>The Proponent must develop and implement a Longterm Leachate Management Strategy that:</p> <ul style="list-style-type: none"> Minimises the generation of leachate at the premises; Captures, treats and disposes of all leachate generated at the premises; Maintains leachate levels in the waste mass to a level that does not inhibit the efficiency of the landfill gas extraction system; Progressively removes all treated leachate from ED3: and  SEP; Minimises the emission of offensive odours from leachate treated and stored onsite so there is no offsite impact. <p>The Longterm Leachate Management Strategy must be submitted to the Planning Secretary and the EPA (for inclusion as a Pollution Reduction Program attached to environment protection licence 11436) for approval within two months of the approval</p>		This Condition was previously assessed and, therefore, was not triggered in this Audit Period.	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	date of MOD 1.				
4.18C	Treated leachate must not be discharged to any part of ED3S, other than ED3S-S, until such time as the Longterm Leachate Management Strategy has been approved by the Planning Secretary and the EPA.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	This Condition was previously assessed and, therefore, was not triggered in this Audit Period. Treated leachate from the Leachate Treatment Dam (LTD) is currently discharged to ED3S-S and ED3N. Stormwater from the Bioreactor is currently discharged to ED3S.	Not triggered	
4.18D	Seepage or leakage points in ED2 must be identified and repaired to the satisfaction of the Planning Secretary and EPA prior to the transfer of any stormwater from ED3S to ED2.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 IEA Information Requested 22 - 30 March 2021.xlsx Veolia Letter to EPA Re: Condition U2.1 of EPL 11436 – Management Plan – Evaporation Dam Seepage, 28/09/2018 Earth2Water, Veolia, Woodlawn Bioreactor – EMP for ED1 & ED2, 27/09/2018 Veolia, Annual Report, Assessment of Environmental Performance – Woodlawn 	<p>Veolia personnel advised that 50 ML stormwater from ED3S was transferred to ED2 during the Audit Period.</p> <p>Veolia advised the Auditors that, as stated in their letter to the EPA dated 28/09/2018, they understand “that the management and monitoring schedule for ED2 is part of Heron Resources responsibility as ED2 is a monitoring location for EPL 20821”. This position was also stated in the 2018 to 2020 AEPRs.</p> <p>Veolia engaged Earth2Water (E2W) to prepare an EMP for ED1 and ED2. In relation to ED2 the potential strategy included: progressive lining of ED2, which according to E2W was in progress in September 2018; lowering of groundwater under ED2; upgrade of the groundwater recovery sump-trench or extraction works at base of ED2 bund wall; remedial works to address seepage issues in a creek; further water quality assessment from 3 new wells and 4 surface water locations. The AEPRs summarise Veolia’s progress with managing ED1 but do not provide information on</p>	Non-compliant	NC3

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>Bioreactor and Crisps Creek Intermodal Facility, 05/11/18 (2018 AEPR)</p> <ul style="list-style-type: none"> • Veolia, Annual Report, Assessment of Environmental Performance – Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 04/11/19 (2019 AEPR) • Veolia, Annual Report, Assessment of Environmental Performance – Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 04/11/20 (2020 AEPR) • Heron Resources Limited, Woodlawn Mine SML20 Annual Review, July 2018 to June 2019, 31/08/2019 	<p>Heron's progress with managing ED2's seepage issues.</p> <p>Based on Herons Annual Review report for 2019 (a more recent report was not available on Heron's website), there had been some progress with lining 3 out of 6 of the cells in ED2 with HDPE.</p> <p>However, there is no evidence available to the Auditors that the seepage or leakage points identified in ED2 have been repaired to the satisfaction of the Department and EPA prior to the transfer of any stormwater from ED3S to ED2.</p> <p>On the basis of the available information, this Condition is considered non-compliant.</p> <p>The Auditors recommend that prior to transferring anymore stormwater from ED3S to ED2, Veolia should establish that the leakage points in ED2 have been identified and repaired to the satisfaction of the Planning Secretary and EPA.</p>		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
4.18E	The Longterm Leachate Management Strategy must be operational no later than 30 September 2018 or as otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> 2019 AEMR 2018 LMP 	Refer to EPL 11436, Condition U1.1. Based on the 2019 AEMR, the LTP was commissioned on 04/10/2018, which was four days after the stipulated completion date of 30/09/18. No recommendation is required.	Non-compliant	NC4
Leachate Treatment Plant					
4.18F	The Proponent must construct the Leachate Treatment Plant (LTP) and associated infrastructure in accordance with the Construction Environment Management Plan prepared by Veolia dated 12 December 2017.		This Condition was previously assessed. The Auditors have no reason to believe this Condition was not met.	Not triggered	
4.18G	All run-off during construction must be contained on the site, no discharges off-site are permitted.		This Condition was previously assessed. The Auditors have no reason to believe this Condition was not met.	Not triggered	
4.18H	The LTP must be: (a) capable of processing at least 4 litres per second of leachate; and (b) bunded to contain 110 % of the facilities largest sized tank.	<ul style="list-style-type: none"> 2018 LMP Costin Roe Consulting, Civil Works Plan, C012424.02-C40, Issue 2, 21/02/2018 	The LMP indicates that the design capacity of the LTP is 4.05 L/s (350 m ³ /d) and the tank bund has a capacity of 2.75 ML, which is > 110% of the largest sized tank (1.8 ML).	Compliant	
4.18I	The sludge skip bin must be bunded and covered to prevent contaminants entering surface water.	<ul style="list-style-type: none"> 2018 LMP Veolia, photograph 	The LMP indicates that the sludge skip bin is covered and located in a bunded area, as confirmed in a photograph provided by Veolia.	Compliant	
Coffer Dam(s)					
4.18J	Treated leachate must not be discharged to any part of ED1, other than within lined coffer dam(s).	<ul style="list-style-type: none"> 2018 LMP 	The LMP states that the final treated effluent from the LTP is transferred to the ED1 Effluent Dam (ED1 ED), which is another name for the ED1 Coffer Dam. The Coffer Dam is lined.	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
4.18K	<p>The coffer dam(s) in ED1 must be designed and constructed:</p> <p>(a) by a suitably qualified and experienced person(s);</p> <p>(b) based on a geotechnical investigation and any recommendations prepared by a suitable qualified person(s); and</p> <p>(c) ensuring that all coffer dam(s) are lined with a High Density Polyethylene liner to the satisfaction of the EPA and in consultation with Water NSW.</p>	<ul style="list-style-type: none"> 2018 LMP E2W, Woodlawn Bioreactor, CQA for ED1c, Report E2W-0281 R001 (V2), 29/10/18, with attached EPA Letter Re. Construction of ED1 coffer dam – Woodlawn Bioreactor (EPL 11436), 04/05/18 	<p>The E2W Construction Quality & Assurance (CQA) Report for ED1 Cofferd Dam (ED1C @ 200 ML) indicates that the requirements of this Condition have been met.</p> <p>The CQA report was submitted to the EPA, Water NSW and the Department on 31/10/18, which may be considered as a form of consultation in the case of Water NSW.</p> <p>An EPA letter attached in Appendix G of the CQA report indicates that the EPA had reviewed the technical specification and dam design drawings and was satisfied with the proposed construction methodology.</p>	Compliant	
4.18L	<p>The Proponent must provide works-as-executed drawings signed by a registered surveyor demonstrating that the coffer dam(s) have been constructed in accordance with the design required by Condition 18K. The Proponent must submit the works-as-executed drawings to the EPA, Water NSW and Planning Secretary prior to the discharge of treated leachate into the coffer dam(s).</p>	<ul style="list-style-type: none"> E2W, Woodlawn Bioreactor, CQA for ED1c, Report E2W-0281 R001 (V2), 29/10/18 Veolia Email and Letter to DPIE, Re. CQA -Report- ED1 Cofferd dam Woodlawn Bioreactor, 31/10/18 Veolia Email and Letter to EPA, Re. CQA Report- ED1 Cofferd dam Woodlawn 	<p>Works-as-executed drawings that had been signed by a registered surveyor were provided in Appendix A of the CQA report, which was submitted to the EPA, Water NSW and the Department on 31/10/18, which was prior to when the LTP started discharging permeate (i.e. treated leachate) from the LTP to the ED1 coffer dam on 29/04/2019.</p>	Compliant	

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		Bioreactor, 31/10/18 <ul style="list-style-type: none"> Veolia Email and Letter to Water NSW, Re. CQA Report- ED1 coffer dam - Woodlawn Bioreactor, 31/10/18 2019 AEMR 			
4.18M	Prior to the discharge of treated leachate into any coffer dam(s) in ED1, the Proponent must confirm in writing and provide a quality assurance report to the EPA, Water NSW and the Planning Secretary that the High Density Polyethylene dam lining has been adequately installed. From the commencement of discharge of treated leachate into the coffer dam(s), the Proponent shall provide quarterly updates to the EPA, Water NSW and the Planning Secretary of the leachate volume in the coffer dam(s) and the remaining leachate storage volume.	<ul style="list-style-type: none"> E2W, Woodlawn Bioreactor, CQA for ED1c, Report E2W-0281 R001 (V2), 29/10/18 Veolia Email and Letter to DPIE, Re. CQA -Report- ED1 Cofferdam Woodlawn Bioreactor, 31/10/18 Veolia Email and Letter to EPA, Re. CQA Report- ED1 Cofferdam Woodlawn Bioreactor, 31/10/18 Veolia Email and Letter to Water 	The CQA report was submitted by Veolia to the EPA, Water NSW and the Department on 31/10/18. Section 11 of the CQA report states that "Based on the CQA/ICQA reports provided by CBI and Terra Firms Laboratories, E2W [was] satisfied with the HDPE liner installation works". The Auditors observe that the monthly LTP reports submitted to the EPA provide a figure and graph of the cumulative volume of permeate discharged to ED1 Cofferdam but it does not indicate the remaining leachate storage volume. There is no evidence that the required quarterly updates have been submitted to Water NSW or the Department. The Auditors consider this Condition to be non-compliant on the basis that quarterly reports have not been submitted in accordance with this Condition. The Auditors recommend that quarterly reports be provided to the EPA, Water NSW and the Department of the leachate volume in the ED1 Cofferdam and the remaining leachate storage volume.	Non-compliant	NC5

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		<p>NSW, Re. CQA Report- ED1 coffer dam - Woodlawn Bioreactor, 31/10/18</p> <ul style="list-style-type: none"> Veolia, Monthly Report – Long-term Leachate Treatment Solution (LLTS) Project, 05/03/21 			
4.18N	Prior to the discharge of treated leachate to any coffer dam(s), the Proponent must install a leak detection system which monitors flows along all pipelines which carry leachate. Any leaks must be investigated, contained and rectified.	<ul style="list-style-type: none"> 2018 LMP 	The LMP indicates that the pipe transferring treated effluent from the LTP to the Cofferd Dam has a leak detection system.	Compliant	
4.18O	Only treated leachate from the LTP is permitted to be stored within coffer dam(s) in ED1 unless otherwise agreed to by the Planning Secretary.	<ul style="list-style-type: none"> 2018 LMP 	The LMP indicates that treated leachate from the LTP is the only wastewater stored in the ED1 Cofferd Dam.	Compliant	
4.18P	<p>The coffer dam(s) are not permitted to exceed 80 per cent capacity until either:</p> <p>(a) a new coffer dam(s) has been designed and constructed in accordance with condition 18K to 18N and is ready to accept treated leachate from the LTP and a revised management plan has been submitted to the satisfaction of the Planning Secretary in accordance with Condition 17 and 18; or</p> <p>(b) sections of ED3N have been emptied of partially treated leachate, had its liner assessed and, if necessary, repaired, and is capable of receiving treated leachate from</p>	<ul style="list-style-type: none"> SLR, Woodlawn Bioreactor Independent Audit, Leachate and Water Management System, 16/06/2019 (2019 LWMS Audit) Veolia, ED1 coffer dam data.JPG, 14/04/21 	<p>The LWMS indicates that the volume capacity of the ED1 Cofferd Dam is 189.35 ML including 0.5 freeboard. Therefore, 80% capacity equates to 151.48 ML.</p> <p>Veolia provided tabulated monthly survey data for ED1 coffer dam that indicates that as of 31/03/21, the volume of the coffer dam was 116 ML, which based on the above information, is less than 80% capacity for the ED1 Cofferd Dam.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	the LTP.	<ul style="list-style-type: none"> Monthly Report – Long-term Leachate Treatment Solution (LLTS) Project, 05/03/21 			
4.18Q	No interaction between the treated leachate in the coffer dam(s) and the mine stormwater in ED1 is permitted.	<ul style="list-style-type: none"> Site visit on 17/03/2021 2018 LMP 	Based on the LMP and site visit observations, a breakwall separates ED1N and ED1 Coffe Dam.	Compliant	
4.18R	<p>Within six months of commissioning the LTP and annually thereafter, unless otherwise agreed to by the Planning Secretary, the Proponent shall commission and pay the full cost of an independent assessment of the leachate and water management system. This audit must be conducted by a suitably qualified, experienced and independent expert whose appointment has been endorsed by the Planning Secretary. During the audit, this expert must:</p> <ul style="list-style-type: none"> (a) consult with the EPA, Water NSW and the Planning Secretary; (b) assess actual performance against the assumptions and predictions made in the project water balance prepared by WSP dated September 2017. This must include: <ul style="list-style-type: none"> (i) actual versus predicted inputs and outputs into and out of each dam; (ii) actual versus predicted mechanical evaporation from each dam; (iii) actual versus predicted rainfall and evaporation; and 	<ul style="list-style-type: none"> 2019 AEMR DPIE letter, Woodlawn Bioreactor & Leachate Treatment Plant (MP10_0012), 04/02/2019 2018 SWMP, including Appendix D, WSP Letter re. Leachate management by mechanical evaporators and the proposed ED1 coffe dam, 28/09/2017 2019 LWMS Audit SLR, Woodlawn Bioreactor Independent Audit, Leachate and Water Management System, 	<p>Based on the 2019 AEMR, the LTP was commissioned on 04/10/2018. DPIE endorsed the SLR Audit Team on 04/02/2019 (taken to approximate when Veolia commissioned SLR), which was within six months of commissioning the LTP. The last day of their audit site visit was 20/03/2019. A second audit site visit was completed by 11 March 2020 (reported August 2020). Therefore, the timing for the audits is considered compliant.</p> <p>The Auditors consider that the SLR assessment of the leachate and water management system (LWMS) generally met the requirements of this Condition. The LWMS assessment findings indicated non-compliances in the water balance modelling in relation to modelling of mechanical evaporators, LTP effluent quality and LTP throughput. In relation to assessing whether the LWMS was achieving its intended objectives, the LWMS audit found that it was, except in relation to causing odours that impacted on the community. The LWMS assessment also</p>	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
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	<p>(iv) the actual versus predicted volume of water or treated leachate stored in each dam.</p> <p>(c) assess actual versus predicted performance of the LTP. This must include:</p> <p>(i) actual versus target effluent quality; and</p> <p>(ii) actual versus target throughput.</p> <p>(d) determine whether the leachate and water management system is achieving its intended objectives; and</p> <p>(e) outline all reasonable and feasible measures that may be required to improve water and leachate management at the site.</p>	<p>27/08/2020 (2020 LWMS Audit), including Appendix B, WSP Memo re. Woodlawn Water Balance Performance Review, 30/04/2020</p>	<p>attempted to respond to comments received via consultation from the Department and the EPA. On this basis, the Auditors consider that this Condition is compliant.</p> <p>However, based on consultation with the EPA for this Independent Environmental Audit, the Auditors understand that the EPA is concerned that due to the lower than predicted LTP throughput (2.1 L/s versus 4 L/s), the LTP is failing to extract sufficient leachate from the void, which may result in a build-up of leachate in the Bioreactor that could impact the landfill gas extraction system and cause odours. The EPA are concerned that the LWMS assessment has not adequately assessed the cumulative impacts of underperformance of the new LTP.</p> <p>The Auditors make the following observations:</p> <ul style="list-style-type: none"> This Condition requires a review of the project's 'water balance'. The Auditors understand that the main purpose of the water balance modelling was to assess the predicted capacity of the evaporation dams under different operational (e.g. LTP throughput, and numbers of mechanical evaporators) and meteorological conditions. Inputs to the model include LTP and LTD effluent and stormwater falling within the dam catchments. It does not model the entire LWMS as it does not include the Bioreactor void and the source of the leachate (i.e liquid 		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			<p>in the waste, groundwater seepage into the void, stormwater that falls into or runs into the void).</p> <ul style="list-style-type: none"> Key objectives of the LWMS is to prevent fugitive emissions / odours and prevent pollution of land, surface water and groundwater. The landfill gas extraction system is also intended to prevent fugitive emissions / odours. These two systems interact within the void. <p>Based on the above observations, it is considered that the water balance model in its current form is not sufficient to assess the overall performance of the LWMS and therefore, the Auditors recommend as an opportunity for improvement, that Veolia in consultation with the EPA, may consider whether a different, more complete water balance model could be used to determine whether the LWMS is achieving its intended objectives. Alternatively, consider modifying this Condition(s) in order to provide clarity on more realistic and achievable assessment goals.</p>		
ED1					
4.18S	The volume of mine water stored in ED1 must be no more than 10 ML by 31 December 2023.	<ul style="list-style-type: none"> 2020 LWMS Audit 	This was assessed in the revised water balance model and the LWMS assessment. SLR concluded that this goal would be achieved although stormwater runoff would need to be managed.	Compliant	
ED3N					
4.18T	ED3N must be emptied of effluent from the existing leachate system by 31 December 2022.	<ul style="list-style-type: none"> 2020 LWMS Audit 	This was assessed in the revised water balance model and the LWMS assessment. SLR concluded	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012																
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #											
			that it was achievable subject to higher than average rainfall.													
4.18U	Prior to discharging treated leachate into sections of ED3N from the LTP, the Proponent must verify the integrity of the dam and prepare an integrity assessment of the ED3N liner to demonstrate the dam is not leaking and is suitable for the storage of treated leachate.	<ul style="list-style-type: none">Interview with Veolia personnel, 17/03/2021	It is understood that the LTP has not discharged to ED3N. Treated leachate from the LTD is discharged to ED3N.	Not triggered												
4.18V	Should the integrity assessment identified in Condition 18U find that the liner in ED3N is not adequate for treated leachate storage, the Proponent must submit management options to the Planning Secretary, Water NSW and the EPA which will be adopted to rectify any integrity issues.		As treated leachate from the LTP has not reportedly been discharged to ED3N, the Auditors have not ascertained if an integrity assessment of the liner in ED3N has been undertaken.	Not triggered												
4.18W	The Proponent must not store treated leachate from the LTP in ED3N until the Planning Secretary and the EPA are satisfied that either ED3N is not leaking or the management options identified in Condition 18V are acceptable.			Not triggered												
NOISE																
Limits																
4.19	<p>The Proponent shall ensure that the noise generated by the operations on-site does not exceed the limits in Table 6 at any private residential receiver.</p> <p><i>Refer to table in Approval</i></p> <table><caption>Table 6: Noise impact assessment criteria dB(A)</caption><thead><tr><th rowspan="2">Receiver</th><th>6am – 10pm</th><th colspan="2">10pm – 6am</th></tr><tr><th>L_{aeq}(15 minute)</th><th>L_{aeq}(15 minute)</th><th>L_{max}</th></tr></thead><tbody><tr><td>Any private residential receiver</td><td>35</td><td>35</td><td>45</td></tr></tbody></table>	Receiver	6am – 10pm	10pm – 6am		L _{aeq} (15 minute)	L _{aeq} (15 minute)	L _{max}	Any private residential receiver	35	35	45	<ul style="list-style-type: none">Veolia, Noise Monitoring Management Plan For Woodlawn Bioreactor, Final, 24/07/2018 (2018 NMMP)	Veolia conduct noise monitoring in response to noise-related community complaints. As none were received during the Audit Period, no noise monitoring was conducted.	Compliant	
Receiver	6am – 10pm		10pm – 6am													
	L _{aeq} (15 minute)	L _{aeq} (15 minute)	L _{max}													
Any private residential receiver	35	35	45													

Table A-1: Compliance with Conditions of Project Approval 10_0012																				
Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	NC #															
	Noise generated by the project is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.	<ul style="list-style-type: none">Eco-Precinct Complaints Register																		
Operating Hours																				
4.20	<p>The Proponent shall comply with the operating hours in Table 7 for the site, unless otherwise agreed in writing by the EPA.</p> <p>Refer to table in Approval (MOD2)</p> <table><caption>Table 7: Operating Hours</caption><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday - Friday</td><td>7 am – 6 pm</td></tr><tr><td>Saturday</td><td>7 am – 1 pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td rowspan="2">Operations</td><td>Monday - Saturday</td><td>6am – 10 pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr></table>	Activity	Day	Hours	Construction	Monday - Friday	7 am – 6 pm	Saturday	7 am – 1 pm	Sunday & Public Holidays	Nil	Operations	Monday - Saturday	6am – 10 pm	Sunday & Public Holidays	Nil	<ul style="list-style-type: none">Interview with Veolia personnel, 17/03/2021	The Auditors have no reason to believe that Veolia are operating outside approved hours.	Compliant	
Activity	Day	Hours																		
Construction	Monday - Friday	7 am – 6 pm																		
	Saturday	7 am – 1 pm																		
	Sunday & Public Holidays	Nil																		
Operations	Monday - Saturday	6am – 10 pm																		
	Sunday & Public Holidays	Nil																		
Monitoring and Management																				
4.21	<p>The Proponent shall prepare and implement a Noise Monitoring and Management Plan for the Landfill to the satisfaction of the Director-General. This Plan must:</p> <p>(a) be prepared in consultation with OEH by a suitably qualified and experienced expert whose appointment has been endorsed by the Director-General;</p> <p>(b) be approved by the Director-General prior to the commencement of expanded operations;</p> <p>(c) include a noise monitoring protocol for evaluating compliance with the noise impact assessment criteria in this approval:</p>	<ul style="list-style-type: none">2018 NMMP	This Condition was previously assessed and, therefore, not triggered in this Audit Period. The NMMP is documented in the 2018 revised LEMP.	Compliant																

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(d) details all reasonable and feasible measures to minimise noise at the site; (e) consider road traffic noise management and include a revised road traffic noise protocol; (f) describe mitigation measures that would be implemented in the event that a non-compliance is identified with the noise impact assessment criteria in this approval. This plan must be documented in the Landfill EMP (see condition 3 in schedule 7).				
Meteorological Monitoring					
4.22	During the life of the project, the Proponent shall ensure that there is a suitable meteorological station in the vicinity of the site that complies with the requirements in the latest version of <i>Approved Methods for Sampling of Air Pollutants in New South Wales guideline</i> .	<ul style="list-style-type: none"> Site inspection, 17/03/2021 	The meteorological station continues to operate in the vicinity of the main office and car park.	Compliant	
FLORA AND FAUNA					
Vegetation Management Plan					
4.23	The Proponent shall prepare and implement a Landscaping and Vegetation Management Plan for the Landfill. This plan must: (a) be prepared in consultation with OEH and NOW by a suitably qualified and experienced expert; (b) be approved by the Director-General prior to the commencement of expanded operations; (c) include measures to minimise such vegetation loss and additional tree planting to offset this loss; (d) detail any landscaping treatments at the Landfill, with particular attention to	<ul style="list-style-type: none"> Veolia, Landscaping and Vegetation Management Plan For Woodlawn Bioreactor, Final, 25/08/2016 (2016 LVMP) 	This Condition was previously assessed and, therefore, not triggered in this Audit Period. The LVMP is documented in the 2018 revised LEMP.	Not triggered	

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	<p>minimising the visibility of the site/s from residences and public vantage points; (e) describe the on-going maintenance regime for rehabilitation and vegetation management in the rehabilitation area/s. This plan must be documented in the Landfill EMP (see condition 3 in schedule 7).</p>				
Pest, Vermin & Noxious Weed Management					
4.24	<p>The Proponent shall: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on 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 surrounding area. <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> These measures must be documented in the Landfill EMP (see condition 3 in schedule 7).</p>	<ul style="list-style-type: none"> 2016 LVMP 	<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period. The LVMP includes pest and weed management measures and is documented in the 2018 revised LEMP.</p>	Not triggered	
FIRE AND EMERGENCY MANAGEMENT					
4.25	<p>The Proponent shall prepare and implement a Fire and Emergency Management Plan for the Landfill. This plan must: (a) be prepared by a suitably qualified and experienced expert; (b) be approved by the Planning Secretary prior to the commencement of expanded operations;</p>	<ul style="list-style-type: none"> Veolia, NSW Woodlawn – Eco-Precinct Emergency Response Plan (Incorporating the Pollution Incident Response 	<p>This Condition was previously assessed and, therefore, largely not triggered in this Audit Period, except in relation to operation of the LTP. The LTP was commissioned in October 2018.</p>	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>(c) identify all threats to the environment and public health that could arise from the operation of the project (e.g. fire, overflow or dam failure);</p> <p>(d) identify strategies to contain and minimise the effects of any threats to the environment and public health such as (but not limited to);</p> <ul style="list-style-type: none"> - measures to minimise the risk of fire on site, including in the landfill area; - actions to extinguish any fires on site promptly; - measures to ensure adequate fire-fighting capacity on site, including a fire fighting tanker; and <p>(e) detail a communication strategy for notifying the relevant government agencies and potentially affected community in the event of an emergency;</p> <p>(f) address any chemical storage required to operate the LTP and be consistent with the DPE's HIPAP No.1, 'Emergency Planning'.</p> <p>This plan must be documented in the Landfill EMP (see condition 3 in schedule 7). Prior to operation of the LTP, the Fire and Emergency Management Plan must be revised and approved by the Planning Secretary.</p>	Management Plan), 15/09/2020 (2020 ERP)	<p>Based on a letter from the Department, a 'Woodlawn Leachate Treatment Plant Emergency Response Plan' dated 30/08/2018, Version 4, was approved by the Department on 18/09/2018, which was prior to operation of the LTP.</p> <p>The ERP, Version 4, was re-issued on 15/09/2020. It includes the LTP.</p>		
4.25A	A comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. Records from the Safety Management System must be kept on-site and must be available for inspection by the Planning Secretary upon request.		Veolia operates a safety management system. The Auditors did not verify that the safety management system is consistent with Hazardous Industry Planning Advisory Paper No. 9, 'Safety	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	The Safety Management System shall be consistent with the Department of Planning and Environment's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'.		Management'; however, the Auditors have no reason to believe the condition is not being met.		
4.25B	<p>The Applicant must store all chemicals in accordance with:</p> <p>(a) the 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 liquids.</p> <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	<ul style="list-style-type: none"> Site inspection, 17/03/2021 	<p>Stored chemicals were observed to have secondary containment. The diesel tank is double skinned. The tanks in the LTP are bunded. Small volumes of chemicals sighted at Crisp Creek IMF were stored on pallet bunds undercover.</p> <p>Two to three Intermediate Bulk Containers (IBCs) that from a distance appeared empty and labelled as corrosives were stored at Crisp Creek IMF outside a bunded area.</p> <p>The Auditors recommend as an opportunity for improvement that the status of these IBCs be reviewed in relation to their contents, labelling and storage location.</p>	Compliant	
VISUAL AMENITY					
Lighting					
4.26	<p>The Proponent shall ensure that the lighting associated with the project:</p> <p>(a) complies with the latest version of AS 4282(INT) - <i>Control of Obtrusive Effects of Outdoor Lighting</i>; and</p> <p>(b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.</p>	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	<p>Site personnel advised that lighting is minimal at night. The 2018 LEMP states "lighting on site is screened and directed in such a way that it does not create a nuisance to surrounding properties or the public road network". No lighting complaints have been received. The Auditors have no reason to believe that the condition has not been complied with.</p>	Compliant	
SECURITY					

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
4.27	The Proponent shall: (a) install and maintain a perimeter stock fence and security gates on the site; and (b) ensure that the security gates on site are locked whenever the site is unattended.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Security fencing was observed around the perimeter of the facility along Collector Road and security gates were observed at the entrance to the facility. Site personnel advised that the front security gate is closed and locked at night by MBT personnel as they are the last to leave. They also reopen the gate in the morning.	Compliant	
LANDFILL CLOSURE AND REHABILITATION					
4.28	The Proponent shall prepare and implement a Closure Plan for the Landfill to the satisfaction of the Planning Secretary. This plan must: (a) be prepared in consultation with the OEH, EPA, Water-NSW and other relevant agencies by suitably qualified and experienced experts whose appointment has been endorsed by the Planning Secretary; (b) be submitted to the Planning Secretary for approval within six (6) months of the date of this approval; (c) ensure that the final landform of the site is consistent with the figure in Appendix 3 of this approval; and (d) include details of the post closure management measures for all aspects of the Project. This plan must be documented in the Landfill EMP (see condition 3 in schedule 7).	<ul style="list-style-type: none"> 2018 LEMP 	This Condition was previously assessed and, therefore, not triggered in this Audit Period. The Closure and Remediation Management Plan incorporating the Post Closure Landfill Rehabilitation Management Plan is documented in the 2018 revised LEMP.	Not triggered	
4.29	The Proponent shall prepare and implement a Rehabilitation Management Plan for the Landfill to the satisfaction of the Planning Secretary. This plan must:	<ul style="list-style-type: none"> 2018 LEMP 	This Condition was previously assessed and, therefore, not triggered in this Audit Period. The Closure and Remediation Management Plan	Not triggered	

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	<p>(a) be prepared in consultation with the OEH, EPA, Water-NSW and other relevant agencies by a suitably qualified and experienced expert;</p> <p>(b) be submitted to the Planning Secretary for approval within six (6) months of the date of this approval;</p> <p>(c) be undertaken in a manner which is complementary with the rehabilitation of the Woodlawn mine site; and</p> <p>(d) must ensure rehabilitation of the site does not impede or limit the rehabilitation works on any part of the Woodlawn Mine site.</p> <p>This plan must be documented in the Landfill EMP (see condition 3 in schedule 7).</p>		incorporating the Post Closure Landfill Rehabilitation Management Plan is documented in the 2018 revised LEMP.		
SCHEDULE 5. SPECIFIC ENVIRONMENTAL CONDITIONS – CRISPS CREEK IMF SITE					
WASTE MANAGEMENT					
Restrictions of the Receipt, Storage, Handling and Disposal of Waste					
5.1	The Proponent shall only receive waste on site that is authorised for receipt by an EPL.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	The Crisps Creek IMF only receives waste from Veolia's Clyde and Banksmeadow facilities. Control measures are in place at Clyde and Banksmeadow to ensure only authorised waste is transported to Crisps Creek. Refer to EPL 11455, Condition L2.1.	Compliant	
5.2	The Proponent shall ensure that any contaminated stormwater and sludges collected at the Crisps Creek IMF are disposed of at the landfill site, unless otherwise approved by OEH.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Stormwater is captured and diverted to a first flush system. Veolia personnel advised that contaminated stormwater or sludge is collected and disposed at the Woodlawn Bioreactor as required.	Compliant	

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5.3	The Proponent shall ensure that there is no storage of sludges or overnight storage of containerised waste, on the Crisps Creek IMF site, unless otherwise approved by the OEH.	<ul style="list-style-type: none"> EPA Letter Re. Environment Protection Licence 11455 – Approval for temporary storage of waste, 25/08/2020 	No sludge or containerised waste is typically stored at the IMF overnight. All containers are unloaded and transported to the Bioreactor on the day of their arrival. However, Veolia sought and gained EPA approval for overnight storage of containers following a derailment on 25/08/2020.	Compliant	
Waste Transportation					
5.4	The Proponent shall ensure that all waste containers are designed, constructed and maintained to prevent the emission of offensive odour and be water-tight to prevent the leakage of leachate during transport and handling activities.	<ul style="list-style-type: none"> Site visit and interview with Veolia personnel on 17/03/2021 	A container maintenance quality assurance program is in place. Carbon filters are replaced 6-monthly. No evidence of leaking containers was observed during the Audit site visit. Veolia personnel advised that they are in the process of replacing older containers with newer containers (600 series) that have been upgraded with an improved liquid seal design and have consistent weights. A few of the newer, lighter grey containers were observed during the site visit.	Compliant	
Litter Control					
5.5	The Proponent shall inspect daily and clear the site (and if necessary, surrounding area) of litter on at least a weekly basis.	<ul style="list-style-type: none"> Site visit and interview with Veolia personnel on 17/03/2021 	The facility is maintained in good condition, with no litter observed at the site. Veolia advised that they continually look for litter when they travel to and from work along Collector Road and then inside the facility during the conduct of their work.	Compliant	
Pest, Vermin & Noxious Weed Management					
5.6	The Proponent shall: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on site; and	<ul style="list-style-type: none"> Veolia, Environmental Management Plan For Crisps Creek 	Site personnel advised that pests, vermin and noxious weeds are managed in accordance with the All waste handled at the IMF is fully containerised. The IMF is manned during active	Compliant	

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	<p>(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 surrounding area.</p> <p>These measures must be documented in the Crisps Creek IMF EMP (see condition 4 in schedule 7).</p> <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>Intermodal Facility, 02/09/2016 (2016 IMF EMP)</p> <ul style="list-style-type: none"> Site visit and interview with Veolia personnel on 17/03/2021 	<p>operations and larger pests will be identified quickly.</p> <p>Monthly inspections for small pests and noxious weeds (as part of the overall Monthly Environmental Inspection) are undertaken. The IMF EMP notes that specific baiting or weeding will be undertaken as required.</p>		
AIR					
Greenhouse Gas					
5.7	<p>The Proponent shall implement all reasonable and feasible measures to minimise:</p> <p>(a) energy use on site; and</p> <p>(b) the greenhouse gas emissions produced on site,</p> <p>to the satisfaction of the Director-General</p>	<ul style="list-style-type: none"> 2016 IMF EMP 	<p>This Condition was previously assessed and, therefore, largely not triggered in this Audit Period. However, energy use and greenhouse gas emissions are addressed in the 2016 IMF EMP and are considered minimal.</p>	Compliant	
Odour					
Discharge Limits					
5.8	<p>The Proponent shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the POEO Act.</p>	<ul style="list-style-type: none"> Woodlawn Bioreactor Complaint Register Site visit on 17/03/2021 	<p>The Auditors did not detect offensive odours during the site visit to the IMF. The Woodlawn Bioreactor Complaint Register, which includes complaints relating to the IMF, did not identify the IMF as an odour source.</p>	Compliant	
Independent Odour Audit					

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5.9	The Proponent shall include consideration of the Crisps Creek IMF site in any Independent Odour Audit required by condition 7 in schedule 4.	<ul style="list-style-type: none"> • 2019 IOA • 2020 IOA • Site visit and personnel interview on 17/03/2021 • Woodlawn Bioreactor Complaints Register • Veolia, Annual Report, Assessment of Environmental Performance – Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 05/11/18 (2018 AEPR) • Veolia, Annual Report, Assessment of Environmental Performance – Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 04/11/19 (2019 AEPR) • Veolia, Annual Report, Assessment of Environmental 	<p>Two Independent Odour Audits (IOA) have been conducted of the Woodlawn facility since the IEA in 2018. Both the 2019 and the 2020 IOA conducted a brief downwind assessment for the IMF to determine presence of waste-based odour. The IOAs did not find any evidence of any waste-based odour being emitted and, on that basis, classified the IMF as a very low risk source of odour. Both the 2019 and 2020 IOA reports stated that “no samples were collected from the IMF as all waste transportation is a fully contained process until the displacement of the contents into the Void via the mobile tipping platform.” The 2019 IOA reports a 62% increase in odour complaints and the 2020 IOA reports a 81% decrease in odour complaints; however, no specific analysis is presented in relation to the IMF.</p> <p>The IOAs note that a review of washing practices associated with the sealed containers and maintenance of the sealed containers should be undertaken to facilitate in the minimisation of odour. However, site personnel advised that the containers are not opened, cleaned or serviced at the IMF.</p> <p>The AEPRs for 2018-2020 reported that no odour complaints relating to the IMF had been received. The Auditors did not detect offensive odours during the Audit visit to the IMF.</p>	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		Performance – Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 04/11/20 (2020 AEPR)			
SOIL AND WATER					
Pollution of Waters					
5.10	Except as may be expressly provided in the EPL for the site, the Proponent shall comply with Section 120 of the POEO Act.	<ul style="list-style-type: none"> Site visit on 17/03/2021 	No evidence of water pollution was observed at the IMF.	Compliant	
Wastewater Management					
5.11	The Proponent shall ensure that there is no vehicle or container wash down at the Crisps Creek IMF.	<ul style="list-style-type: none"> Site visit and personnel interview on 17/03/2021 	Site personnel advised that the containers are not opened, cleaned or serviced at the IMF. Similarly, the trucks are not washed down either.	Compliant	
5.12	The Proponent shall ensure that: (a) the on-site sewage treatment system at the Crisps Creek IMF is operated in accordance with a Network Operator's Licence under the <i>Water Industry Competition Act 2006</i> , if required; (b) the design of the sewerage system is consistent with Council's DCP (if applicable); and (c) the disposal and irrigation of treated sewage is consistent with the <i>Environmental Guidelines Use of Effluent by Irrigation</i> (DECC) and the Australian guidelines for water recycling: <i>managing health and environmental risks (phase1) – 2006</i> .		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
Bunding					

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
5.13	The Proponent shall store all chemicals, fuels and oils used on site in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund, unless double-skinned tanks are used. Any bunds shall be designed and installed in accordance with the requirements of all relevant Australian Standards, and/or OEH's Environmental Protection Manual: <i>Technical Bulletin Bunding and Spill Management</i> .	<ul style="list-style-type: none"> Site inspection, 17/03/2021 	Small volumes of chemicals were observed stored on pallet bunds undercover (in the forklift car ports) at the Crisp Creek IMF.	Compliant	
Erosion and Sediment Control					
5.14	During the construction, the Proponent shall implement suitable erosion and sediment control measures on site, in accordance with the relevant requirements in the latest version of the <i>Managing Urban Stormwater: Soils and Construction</i> guideline.	<ul style="list-style-type: none"> Site inspection, 17/03/2021 	<p>This Condition applied during construction of the development and is therefore, no longer applicable.</p> <p>The Auditors observed that whilst there was evidence of slope stability erosion controls used in a swale drain at the IMF, the sides of the drain had eroded in some places and required maintenance. The Auditors recommend as an opportunity for improvement, that the drain be inspected and repaired.</p>	Not triggered	
NOISE					
Limits					
5.15	The Proponent shall ensure that the noise generated by the operations on-site, other than freight train activities, does not exceed the limits in Table 8 at any private residential receiver.	<ul style="list-style-type: none"> Woodlawn Bioreactor Complaint Register 	The Auditors did not observe excessive noise during the site visit to the IMF. The Woodlawn Bioreactor Complaint Register, which includes	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012																				
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #															
	<p><i>Refer to table in Approval</i></p> <p><small>Table 8: Noise impact assessment criteria dB(A)</small></p> <table><tr><th rowspan="2">Receiver</th><th>6am – 10pm</th><th colspan="2">10pm – 6am</th></tr><tr><th>L_{Aeq}(15 minute)</th><th>L_{Aeq}(15 minute)</th><th>L_{Amax}</th></tr><tr><td>Any private residential receiver</td><td>35</td><td>35</td><td>45</td></tr></table>	Receiver	6am – 10pm	10pm – 6am		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Amax}	Any private residential receiver	35	35	45	<ul style="list-style-type: none">Site visit on 17/03/2021	complaints relating to the IMF, did not include any noise-related complaints.						
Receiver	6am – 10pm		10pm – 6am																	
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Amax}																	
Any private residential receiver	35	35	45																	
5.16	<p>Noise emissions from freight trains entering and leaving the site must not exceed the noise limit of 45 dB(A) LAeq (15 minute) prior to 7:00 am and 50 dB(A) LAeq (15 minute) after 7:00 am.</p> <p><i>Noise generated by the project is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.</i></p>	<ul style="list-style-type: none">Pacific National, Code of Conduct, Veolia Rail OperationsSite visit on 17/03/2021	<p>The Code of Conduct requires that train crew manage train to reduce noise impacts of bunching and stretching.</p> <p>At the time of the site visit, the train was stationary and a forklift was loading empty containers off trucks and onto the train. The Auditors did not observed elevated noise levels</p> <p>No noise complaints have been received by Veolia in relation to train noise at the IMF.</p>	Compliant																
Operating Hours																				
5.17	<p>The Proponent shall comply with the operating hours in Table 9 for the site, unless otherwise agreed in writing by the EPA.</p> <p><i>Refer to table in Approval (MOD2)</i></p> <p><small>Table 9: Operating Hours</small></p> <table><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday - Friday</td><td>7 am – 6 pm</td></tr><tr><td>Saturday</td><td>7 am – 1 pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td rowspan="2">Operations</td><td>Monday - Saturday</td><td>6am – 10 pm</td></tr><tr><td>Sunday, Christmas Day and Good Friday</td><td>Nil</td></tr></table>	Activity	Day	Hours	Construction	Monday - Friday	7 am – 6 pm	Saturday	7 am – 1 pm	Sunday & Public Holidays	Nil	Operations	Monday - Saturday	6am – 10 pm	Sunday, Christmas Day and Good Friday	Nil	<ul style="list-style-type: none">Interview with Veolia personnel, 17/03/2021	Veolia advised that operations are generally conducted between 6:30am to 4.00pm for haulage of waste from the IMF to the bioreactor is dependent upon train movements.	Compliant	
Activity	Day	Hours																		
Construction	Monday - Friday	7 am – 6 pm																		
	Saturday	7 am – 1 pm																		
	Sunday & Public Holidays	Nil																		
Operations	Monday - Saturday	6am – 10 pm																		
	Sunday, Christmas Day and Good Friday	Nil																		
VISUAL AMENITY																				
Lighting																				

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
5.18	The Proponent shall ensure that the lighting associated with the project: (a) complies with the latest version of AS 4282(INT) - <i>Control of Obtrusive Effects of Outdoor Lighting</i> ; and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Site personnel advised that lighting is switched off at night except for emergency lighting. The 2016 IMF EMP states that "lighting installed at the site is directed away from Tarago/Bungendore road and screened to minimise potential distraction to road users". No lighting complaints have been received. The Auditors have no reason to believe that the condition has not been complied with.	Compliant	
SECURITY					
5.19	The Proponent shall: (a) install and maintain a perimeter stock fence and security gates on the site; and (b) ensure that the security gates on site are locked whenever the site is unattended.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Security fencing was observed around the perimeter of the facility along Collector Road and security gates were observed at the entrance to the facility. Site personnel advised that the front security gate is closed and locked at night.	Compliant	
RAIL TRAFFIC					
5.20	The Proponent shall ensure that only 2 trains (4 movements) in total are permitted to ingress and egress from the Crisps Creek IMF per day from Monday to Saturday.	<ul style="list-style-type: none"> 2018 AEMR 2019 AEMR 2020 AEMR 	This non-compliance has continued as noted in the previous IEA due to the necessity for the train to be split in two prior to arrival at the IMF. This continued until the Tarago Loop Extension works were completed in November 2020. The number of trains per day has reverted back to 2 in compliance with this Condition. Based on the 2019 AEMR, DPIE issued an Official Caution on July 2018. No recommendation is required.	Non-compliant	NC6
5.21	The tonnage of waste delivered to the IMF by train must not exceed 780 000 tpa, until the electronic signalling system has been implemented so as to eliminate the need	<ul style="list-style-type: none"> 2018 AEMR 2019 AEMR 2020 AEMR 	Based on the AEMRs, the quantities of waste received at the IMF by rail from Sydney have been <780 000 tpa during the Audit Period.	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	for waste trains to stop across the road crossing at Tarago.	<ul style="list-style-type: none"> PWS 2018 – Summary PWS 2019 – Summary PWS 2020 – Summary 			
5.22	The tonnage of SRF material dispatched from the Crisps Creek IMF by train must not exceed 37,400tpa.			Not triggered	
SCHEDULE 6. TRAFFIC AND ROAD UPGRADES					
TRAFFIC AND TRANSPORT					
Delivery of Waste from the IMF to the Landfill					
6.1	The Proponent shall ensure that at all times heavy vehicles transporting waste from the Crisps Creek IMF to the Landfill travel via the Crisps Creek IMF site access road, onto Bungendore Road, onto Collector Road and then onto the Landfill site access road.	<ul style="list-style-type: none"> 2016 IMF EMP 	The route the trucks take is in compliance with this Condition and is shown in the 2016 IMF EMP. Vehicles are tracked via GPS via the Intelligent Access Program.	Compliant	
6.2	The Proponent shall ensure that the reverse of the route specified in condition 1 of this schedule above is used to egress from the Landfill site at all times.	<ul style="list-style-type: none"> 2016 IMF EMP 	As above	Compliant	
Delivery of Regional Waste by Road					
6.3	The Proponent shall ensure that all regional waste is transported to the Landfill by road along those routes specified in Appendix 4 of this approval, unless otherwise approved by the Director-General. Alternative transport routes may be considered where they can be shown to be more efficient, if new roads are constructed in the region, where suitable upgrades occur along other transport routes to the Landfill or where	<ul style="list-style-type: none"> Veolia, Transport Code of Conduct, April 2011 	A Transport Code of Conduct was prepared by Veolia in April 2011. This Code of Conduct notes that Council truck drivers are required to undertake a site induction prior to delivery of waste to the facility and includes information on the required transport routes. The required routes are generally the quickest routes to the Facility from the surrounding major centres. The	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	they are required to allow waste to be delivered from a new locality. <i>Note: this condition is linked to condition 6 in schedule 3.</i>		Auditors have no reason to believe this condition is not complied with.		
Transport Code of Conduct					
6.4	<p>Prior to the receipt of more than 50,000 tpa of regional waste by road at the landfill, the proponent shall prepare and implement a Transport Code of Conduct for the project to the satisfaction of the Director-General. This protocol must:</p> <p>(a) be prepared in consultation with the RMS, Goulburn Mulwaree Council, Palerang Council and the Community Liaison Committee, and be submitted to the Director-General for approval;</p> <p>(b) describe the measures to be implemented to:</p> <ul style="list-style-type: none"> - minimise the impacts of the project on the local and regional road network including traffic noise; - ensure truck drivers only use road shoulders to encourage overtaking at locations where it is acceptable to do so (i.e. in terms of safety and pavement strength), as determined by Council; - minimise conflicts with other road users e.g. school bus operators; and (c) include measures to ensure truck drivers are aware of the approved routes for the transport of waste by road. 	<ul style="list-style-type: none"> • Veolia, Transport Code of Conduct, April 2011 	<p>The Transport Code of Conduct was last issued in 2011. It was not updated in consultation RMS, Goulburn Mulwaree Council, Palerang Council and the Community Liaison Committee to the satisfaction of the Department prior to the receipt of more than 50,000 tpa of regional waste.</p> <p>The Auditors recommend that the Transport Code of Conduct be updated in consultation RMS, Goulburn Mulwaree Council, Palerang Council and the Community Liaison Committee, and to the satisfaction of the Department.</p>	Non-compliant	NC7
ROAD UPGRADES					
<i>Palerang LGA</i>					
6.5	Within 12 months of the date of this approval, the Proponent shall undertake a	<ul style="list-style-type: none"> • Palerang Council, Letter to Veolia Re: 	This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>detailed pavement analysis/road safety audit of the section of Main Road 268 (Bungendore/Tarago Road) to the south of the intersection of Collector Road and Main Road 268 (Bungendore/Tarago Road) where the bitumen seal of the road is currently less than 7 metres wide. The audit shall:</p> <p>(a) be prepared by a suitably independent and qualified expert whose appointment has been endorsed by the Director-General;</p> <p>(b) be prepared in consultation with Palerang Council and the RMS;</p> <p>(c) establish the mandatory road upgrades and traffic management measures required to address all road pavement and safety issues associated with the project on this section of road; and</p> <p>(d) determine the full cost of undertaking any upgrades, and the Proponent's proportional contribution to these works based on heavy vehicle usage along Main Road 268 (Bungendore/Tarago Road).</p> <p><i>Note: the Proponent must submit a copy of this audit to the Department within 2 weeks of its completion.</i></p> <p><i>See Appendix 4 for reference to the intersection of Collector Road and Main Road 268.</i></p>	<p>Tarago Road Maintenance Strategy, 10/03/15</p> <ul style="list-style-type: none"> Interview with Veolia personnel, 29/04/21 			
6.6	<p>Prior to the receipt of more than 30,000 tpa of regional waste at the Landfill by road from the south of the intersection of Collector Road and Main Road 268 (Bungendore/Tarago Road), the Proponent shall:</p>	<ul style="list-style-type: none"> Palerang Council, Letter to Veolia Re: Tarago Road Maintenance Strategy, 10/03/15 	<p>The Palerang Council resolved at a Council meeting on 05/03/15 to agree to arrangements including mandatory road upgrade to address road pavement and safety issues. The Council agreed with Veolia that Veolia would forward fund</p>	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>(a) implement all mandatory pavement and traffic management measures required to address all road pavement/safety issues associated with the project on Main Road 268 (Bungendore/Tarago Road) recommended by the audit required by condition 5 of this schedule; and</p> <p>(b) forward fund the full cost of and provide (on Main Road 268 - Bungendore/Tarago Road) any mandatory road upgrades recommended by the audit required by condition 5 of this schedule, to the satisfaction of the Director-General.</p> <p><i>Note: a mechanism for recovering a proportion of the costs for undertaking any of the above measures is provided in condition 11 of this schedule. See Appendix 4 for reference to the intersection of Collector Road and Main Road 268.</i></p>	<ul style="list-style-type: none"> Interview with Veolia personnel, 29/04/21 QPRC Purchase Order History.xlsx 	<p>the Priority 1 works as its proportional contribution under Condition5 (d). Council resolved to advise NSW Planning that the strategy outlined in the Council letter was acceptable to Council and that the road upgrades would be carried out in stages over 3 years. and therefore, it accepted that the work was unlikely to be completed prior to the receipt of more than 30,000 tpa regional waste.</p> <p>Veolia personnel advised that the road upgrades work was being carried out by Council and was progressing slowly. The Auditors have no reason to believe that this is not the case.</p> <p>The QPRC Purchase Order History indicates that Veolia was contributing to the Tarago Road Funding Contribution at least to 24/06/20.</p>		
6.7	<p>In any case, the Proponent shall ensure that all mandatory road upgrades measures provided as part of condition 6 of this schedule are completed prior to the receipt of more than 30,000 tpa of regional waste at the Landfill by road from the south of the intersection of Collector Road and Main Road 268 (Bungendore/Tarago Road).</p> <p><i>Note: the Proponent must notify the Department within 2 weeks of the completion of all road upgrades required as part of this condition. See Appendix 4 for reference to the intersection of Collector Road and Main Road 268.</i></p>	<ul style="list-style-type: none"> Palerang Council, Letter to Veolia Re: Tarago Road Maintenance Strategy, 10/03/15 Interview with Veolia personnel, 29/04/21 	As above.	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
<i>Goulburn Mulwaree LGA</i>					
6.8	<p>Prior to the commencement of expanded operations, the proponent shall assess the need for road upgrades, on the section of Main Road 268 (Bungendore/Tarago Road) between the Crisps Creek IMF site access and the intersection of Collector Road and Bungendore/Tarago Road. This assessment shall:</p> <ul style="list-style-type: none"> a) be prepared to the satisfaction of the Director-General; b) be prepared by a suitably independent and qualified expert whose appointment has been endorsed by the Director-General in consultation with RMS; c) evaluate the suitability of the provision of a climbing lane or other suitable road upgrade alternative/s on this section of road in terms of road traffic safety and the safety of the Proponent's truck drivers negotiating the right-hand turn into Collector Road; d) based on the above, identify the most suitable road upgrade option for this section of road; and, if identified as the most suitable road upgrade option by this condition 8(d) e) assess the need for a climbing lane against <i>Austroads Guide to Road Design Part 3: Geometric Design</i> based on heavy vehicle usage associated with the Bioreactor on this section of road. <p><i>Note: Within 2 weeks of its completion, a report on this assessment shall be</i></p>		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<i>submitted to the Department for review. See Appendix 4 for reference to the intersection of Collector Road and Main Road 268.</i>				
6.9	<p>Depending on which road upgrade option is identified as most suitable under condition 8(d) above, prior to the commencement of expanded operations, or a time otherwise agreed to by the Director-General, the Proponent shall provide that road upgrade on the above section of Main Road 268 (Bungendore/Tarago Road), to the satisfaction of Goulburn Mulwaree Council.</p> <p><i>Note: these works must be provided at no cost to Goulburn Mulwaree Council or RMS.</i></p>		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
ROAD MAINTENANCE CONTRIBUTIONS					
6.10	<p>From the date of this approval, the Proponent shall pay a minimum quarterly contribution of 4.1 cents per kilometre per tonne to:</p> <p>(a) Palerang Council for waste hauled to the Landfill along Palerang Council maintained roads; and</p> <p>(b) Goulburn Mulwaree Council for waste hauled to the Landfill along Goulburn Mulwaree Council maintained roads.</p> <p>The contribution rate shall be adjusted every year from the date of this approval to</p>	<ul style="list-style-type: none"> GMC Purchase Order History.xlsx QPRC Purchase Order History.xlsx 	The Auditors understand that Veolia provides waste tonnages to the relevant Councils and the Councils calculate the contributions. Adjusted contributions to Goulburn Mulwaree Council were observed for 2018 to 2020, and 2019 to 2020 for the Palerang Council.	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	account for the effects of inflation (RMS Road Cost Index).				
6.11	<p>The Proponent shall receive a reduction in road maintenance contributions paid to Palerang Council (in cents per kilometre per tonne of waste hauled) as required by condition 10 of this schedule based on the difference between the full cost of undertaking any mandatory road upgrades along Main Road 268 (Bungendore/Tarago Road) and what the Proponent's proportional contribution should be (as determined by the audit required by condition 5 (d) of this schedule) unless other arrangements are made with Palerang Council, to the satisfaction of the Director-General.</p> <p><i>Note: at any time either party may refer the matter to the Director-General for dispute resolution.</i></p>			Noted	
SCHEDULE 7. ENVIRONMENTAL MANAGEMENT, REPORTING & AUDITING					
COMMUNITY LIASON COMMITTEE					
7.1	The Proponent shall continue to operate a Community Liaison Committee (CLC) comprising representatives of the Proponent, the local community, Council and Supervisory Licensee. Representatives of relevant government agencies may be invited to attend meetings of the Committee as required.	<ul style="list-style-type: none"> Veolia's Woodlawn Bioreactor, NSW webpage (https://www.veolia.com/anz/our-services/our-facilities/landfills/woodlawn-bioreactor-facility) 	<p>Minutes of quarterly CLC meeting are available on the Veolia website. There is no longer a Supervisory Licensee (The POEO Act was amended in 2017 to repeal supervisory licences in respect of putrescible waste facilities).</p> <p>The Auditors observe that during the Audit Period, the frequency of meeting (quarterly) was reduced to 2 meetings in 2018 (one of which was in the previous Audit Period), 1 meeting in 2019 and 3 meetings in 2020.</p>	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
7.2	Within six (6) months of the date of this approval, the Proponent must submit details of the CLC members including the Chairperson and frequency of meetings to the Department for the Director-General's endorsement.	<ul style="list-style-type: none"> 2018 AEMR 	This Condition was assessed and found to be non-compliant in the previous IEA. The 2018 AEMR indicated that Veolia verified with the Department that the CLC members were endorsed by the Department in May 2018.	Compliant	
ENVIRONMENTAL MANAGEMENT					
7.3	The Proponent shall prepare and implement an Environmental Management Plan (EMP) for the Landfill to the satisfaction of the Director-General. This plan must: <ul style="list-style-type: none"> a) be submitted to the Director-General for approval prior to the commencement of expanded operations; b) be prepared in consultation with the OEH and other relevant agencies by a suitably qualified and experienced expert/s; c) provide the strategic framework for environmental management of the Landfill including all plans specified for inclusion in schedule 4; d) identify the statutory approvals that apply to the Landfill; e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Landfill; f) include procedures to keep the local community informed about the operation and environmental management of the Landfill; g) describe the procedure for stakeholder consultation and complaints handling; and 	<ul style="list-style-type: none"> 2018 LEMP DPIE letter Re. Woodlawn Bioreactor, Landfill Environmental Management Plan, (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 	This Condition was previously assessed and, therefore, not triggered in this Audit Period. However, it is observed that Veolia issued a final Landfill Environmental Management Plan (LEMP) in September 2018, which was approved by DPIE on 18/09/2018.	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	h) include a clear plan depicting all the monitoring currently being carried out within and around the Landfill.				
7.4	<p>The Proponent shall prepare and implement an Environmental Management Plan (EMP) for the Crisps Creek IMF to the satisfaction of the Director-General. This plan must:</p> <ul style="list-style-type: none"> a) be submitted to the Director-General for approval prior to the commencement of expanded operations; b) be prepared in consultation with the OEH and other relevant agencies by a suitably qualified and experienced expert/s; c) provide the strategic framework for environmental management of the Crisps Creek IMF including: <ul style="list-style-type: none"> i. water management including any surface and groundwater monitoring programs, measures to minimise water use, control soil erosion, prevent groundwater contamination, and comply with any surface water discharge limits; ii. noise management and monitoring protocols for evaluating compliance with the noise impact assessment criteria in this approval; iii. landscaping treatment at the Crisps Creek IMF to minimise visibility of the site from residences and public vantage points; iv. details of the on-going maintenance regime ('Works Plan') for riparian stream rehabilitation and vegetation management along the Mulwaree River; v. identify all threats to the environment and public health that could arise from the operation of the Crisps Creek IMF, measures to minimise these risks and notify 		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	the relevant government agencies and community in the event of an emergency; d) identify the statutory approvals that apply to the Crisps Creek IMF; e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Crisps Creek IMF; f) include procedures to keep the local community informed about the operation and environmental management of the Crisps Creek IMF; g) describe the procedure for stakeholder consultation and complaints handling; and h) include a clear plan depicting all the monitoring currently being carried out within and around the Crisps Creek IMF.				
Annual Environmental Management Review					
7.5	One (1) year after the commencement of expanded operations, and annually thereafter, the Proponent shall prepare an Annual Environmental Management Report (AEMR) to review the environmental performance of the project to the satisfaction of the Director-General. This review must: a) describe the operations that were carried out in the past year; b) analyse the monitoring results and complaints records of the Project over the past year, which includes a comparison of these results against the - relevant statutory requirements, limits or performance measures/criteria; - monitoring results of previous years; and - relevant predictions in the EA;	<ul style="list-style-type: none"> • 2018 AEMR • 2019 AEMR • 2020 AEMR 	<p>The AEMRs during the Audit Period generally meet the requirements of this Condition and are therefore, considered compliant.</p> <p>The Auditors observe that whilst non-compliances are discussed in the AEMRs (e.g. waste volume limit exceedances), they are not always clearly identified as a "non-compliance". For example, the 2020 AEMR provides waste volumes for regional waste received at the Bioreactor (207,208 t), including bushfire impacted waste (64,455 t), but it is left to the reader to determine the volume not including bushfire impacted waste (142,753 t), which represents a limit exceedance. The Auditors recommend as an opportunity for improvement that the AEMRs</p>	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	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 Project; and e) describe what measure will be implemented over the next year to improve the environmental performance of the Project.		more clearly identify non-compliances and the Auditors suggest a separate section be included in the AEMR that provides a summary of the identified non-compliances.		
INDEPENDENT ENVIRONMENTAL AUDIT					
7.6	Every three (3) years after the first Independent Odour Audit required under condition 7 of schedule 4 of this approval, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the Project. This audit must: a) be conducted by a suitably qualified, experienced, and independent team of experts, including both traffic and odour experts, whose appointment has been endorsed by the Director-General; b) incorporate and consider the findings/mandatory recommendations of any Independent Odour Audit required by this approval. c) assess the environmental performance of the Project, and its effects on the surrounding environment; d) assess whether the Project is complying with the relevant standards, performance measures, and statutory requirements; e) review the adequacy of any strategy/plan/program required under this approval; and, if necessary,	<ul style="list-style-type: none"> Ramboll, Independent Environmental Audit, Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 06/06/2018 DPIE Letter, Re. Woodlawn Bioreactor Expansion Project (MP10_0012), Audit Team Approval Request, 05/02/2021 	This Independent Environmental Audit (IEA) has been prepared to address Condition 7.6. The previous IEA site visits were conducted in March 2020 and the site for this IEA have also been completed in March 2021, three years later. The Audit Team was endorsed by the Department on 05/02/2021.	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	f) recommend measures or actions to improve the environmental performance of the Project, and/or any strategy/plan/program required under this approval.				
COMPLAINTS HANDLING PROCEDURE					
7.7	<p>Within 6 months of the date of this approval, a complaints handling procedure must be submitted to the Director-General for approval. The procedure shall be prepared in consultation with the Department, Goulburn-Mulwaree Council, the EPA and the Community Liaison Committee. The complaints handling procedure must include:</p> <ul style="list-style-type: none"> - a formal complaint/incident reporting procedure; - an investigation procedure; and - a complaint resolution procedure. <p>A report of the complaint and the response/action taken to resolve the complaint must be made publicly available on the proponent's website within 7 days of a complaint being made. <i>Note: The level of detail contained in the report of the complaint shall be determined in consultation with the Department, Goulburn- Mulwaree Council, the EPA and the Community Liaison Committee.</i></p>	<ul style="list-style-type: none"> Community Consultative Committee Meeting, 23/05/2018 Woodlawn_Bioreactor_-_Complaints_Register_34_20180604.pdf (https://www.veolia.com/anz/sites/g/files/dvc2011/files/document/2018/06/Woodlawn_Bioreactor_-_Complaints_Register_34_20180604.pdf) 	<p>This Condition was previously assessed in relation to the procedures and, therefore, not triggered in this Audit Period.</p> <p>The Auditors observe that the minutes of the Community Consultative Committee Meeting on 23/05/2018 record a resident noting that a complaint she had made had not been published on the website register within the required 7 days. Based on the complaint registers published on the website, there were 4 complaints between 19/04/2018 and 26/05/2018 that were not published on the website until 04/06/2018. On this basis, this Condition is considered non-compliant.</p> <p>The Auditors understand that this was due to a change in the web service provider and that this matter has been rectified. Therefore, no recommendation is made.</p>	Non-compliant	NC8
7.7A	The Proponent shall provide a report to the Planning Secretary of the complaints received and the response/action taken and timeframe in accordance with Condition 7, on an annual basis which is to be submitted within the AEMR. The report shall include all	<ul style="list-style-type: none"> 2018 AEMR 2019 AEMR 2020 AEMR 	The Complaints Register are published in the AEMRs as required.	Compliant	

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	the matters required within subsections of Condition 7.				
INCIDENT REPORTING					
7.8	Upon detecting an exceedance of the limits/performance criteria in this approval or the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent shall immediately (or as soon as practical thereafter) notify the Department and other relevant agencies of the exceedance/incident. Within 7 days of the date of the incident, the Proponent shall provide the Director- General and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	<ul style="list-style-type: none"> • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11436 Annual Return • 2019 EPL 11436 Annual Return • 2020 EPL 11436 Annual Return • Incident Cause Analysis Method (ICAM) Investigation Report, 09/06/2020 • Veolia letter to EPA, incident update, 12/06/2020 • Meeting Minutes, Gas Extraction System Review, 26/06/2020 • Interview with Veolia personnel, 01/04/21 	<p>As found in relation to Schedule 3, Condition 5 (3.5), waste volume limits were exceeded during the Audit Period, which were not notified and reported to the Department within the required timeframes. The Auditors note that under PA 10_0012, Schedule 2 Definitions, an 'incident' is defined as "An incident causing or threatening material harm to the environment, and/or an exceedance of the limits or performance criteria in this approval". Therefore, on this basis, this Condition is considered non-compliant.</p> <p>The Auditors recommend that Veolia conduct an investigation as to why the Department was not notified of these exceedances (e.g. failure to identify the waste volume limit exceedances as an 'exceedance' and/or an 'incident', failure to understand this Condition, this requirement not specified in a procedure?) and based on the investigation findings carry out appropriate corrective action(s) to prevent a reoccurrence.</p> <p>Based on the Annual Returns, the PIRMP was activated on 05/08/2019 (desktop drill exercise, hence no notifications) and 02/06/2020. The latter incident was when a fault in the Process Logic Control (PLC) software for Gas Extractor Booster #1 resulted in the shutdown of the Bioreactor Gas Extraction System, which had the potential to cause fugitive landfill gas and</p>	Non-compliant	NC9

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			<p>potential odour emissions from the Bioreactor. Veolia notified the EPA but did not notify the Department on the basis that they did not believe there was a risk of material harm. They notified the EPA in order to provide the EPA with relevant information in case residents contacted the EPA to make an odour complaint. Veolia also provided information to the community via letter drop. Given that only a single odour complaint was made, this assessment of the level of harm appears appropriate and therefore, the Auditors consider that Veolia's decision not to notify the Department of this incident is considered reasonable.</p> <p>The Auditors observed that Veolia's ERP / PIRMP does not refer to the requirement to notify the Department in accordance with this Condition. The Auditors recommend as an opportunity for improvement that the ERP / PIRMP be reviewed and revised to include the requirement to notify the Department in accordance with this Condition if the incident presents a risk of material.</p>		
Revision of Plans & Programs					
7.9	Within three (3) months of the submission of any: a) audit required under this approval; b) incident report under condition 8 of this schedule; or c) annual review under condition 5 of this schedule,	<ul style="list-style-type: none"> • 2019 LWMS Audit • 2020 LWMS Audit • 2018 SWMP • EPA Letter to DPIE, Re. Review of proposed updates to Woodlawn 	The 2019 Independent Audit of the LWMS recommended that the 2017 water balance be reviewed and rerun, which was subsequently done in 2020. The Soil and Water Management Plan, which was revised in 2018, still contains the 2017 water balance. The Surface Water Management Plan (Appendix A) may also be out	Non-compliant	NC10

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	The Proponent shall review, and if necessary revise the plans and programs required under this approval to the satisfaction of the Director-General. <i>Note: This is to ensure the plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Project.</i>	Bioreactor Environmental Management Plans, 16/08/2018	<p>of date as the sampling and transfer point for the stormwater in the void may have changed from Pond 3 to Pond 5 in 2019 (refer to DA 31-02-99, Condition 65), which is a source of confusion for the EPA (based on consultation with the EPA for this Audit). Given that the water balance was updated and other aspects of the soil and water management system may have changed, it is considered that a review and revision of the SWMP should have been carried out before now. Furthermore, during consultation with the EPA for the 2018 revision of the SWMP, the EPA indicated that they expected the SWMP would be updated following the LWMS Audit(s) and changes to the stormwater management system. This did not occur.</p> <p>On the basis that the SWMP should have been reviewed and revised following the 2020 LWMS Audit and the implementation of changes to the stormwater management system, this Condition is considered non-compliant. The Auditors recommend that the LEMP and its sub-plans be reviewed and revised, as appropriate, which we understand Veolia is already in the process of doing. Veolia should consider the EPA's previous comments in relation to the SWMP and LMP (16/08/2018).</p>		
ACCESS TO INFORMATION					

Table A-1: Compliance with Conditions of Project Approval 10_0012					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
7.10	From the commencement of expanded operations, the Proponent shall make the following information publicly available on its website as it is progressively required by the approval: a) a copy of all current statutory approvals; b) a copy of the Environmental Management Plan required under this approval; c) a copy of any Annual Environmental Management Report including monitoring results (over the last 5 years); d) a copy of any Independent Environmental or Odour Audit, and the Proponent's response to the recommendations in any audit; e) report of the complaints and the response/action taken to resolve the complaint as required by Condition 7; f) a copy of the minutes of the Community Liaison Committee Meetings; and g) any other matter required by the Director-General.	<ul style="list-style-type: none"> Veolia's Woodlawn Bioreactor, NSW webpage (https://www.veolia.com/anz/our-services/our-facilities/landfills/woodlawn-bioreactor-facility) 	The majority of the required documents are provided on the Veolia's Woodlawn Bioreactor, NSW webpage, with the exception of Veolia's responses to the IOAs. The responses / Actions for the IEAs have been included in the IEA report. The Auditors recommend as an opportunity for improvement that the responses to any Independent Environmental or Odour Audit are uploaded to the webpage along with the audit report. It is recommended that responses are provided as a separate document to the audit reports.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
Adherence to Terms of DA and EIS					
1	Development shall be carried out in accordance with: a) DA No. 31-02-99; b) the EIS prepared by Woodward-Clyde Pty Ltd, dated February 1999; c) the EIS Supplementary Report prepared by Woodward-Clyde Pty Ltd, dated March 1999; d) the Amended DA and accompanying information prepared by Woodward-Clyde, dated 12 November 1999; e) Modification Application DA31-02-99 Mod1 and accompanying Environmental Assessment titled " <i>Modification to DA31-02-99 to Receive Regional Council Waste at the Woodlawn Bioreactor</i> ", prepared by Veolia Environmental Services, dated February 2010 and the associated 'Response to Submissions' prepared by Veolia Environmental Services dated 12 April 2010; f) Modification Application DA31-02-99 Mod2; and g) Modification Application DA31-02-99 Mod3.		Compliance with conditions of this consent are assessed in this table including its Modifications. The Auditors note that several conditions of this consent are superseded by Project Approval 10_0012 and several others are duplicates of conditions Project Approval 10_0012. The Auditors also cross-reference EPL conditions that duplicate or are similar to conditions in consent.		
Deferred Commencement					
2	In accordance with section 80(3) of the EP&A Act, this consent shall not operate until the Applicant satisfies the Minister that it has been awarded a valid contract for the long-term supply of waste, sourced from Sydney, at a rate of at least 150,000 tonnes per annum.		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
Duration of The Consent					
3	Approval is granted for 20 years from the date of commencement of landfilling operations, subject to the input rate variations as specified in Condition 4.		Operations commenced in September 2004 so this approval is valid until September 2024. The Auditors note that nothing in	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99																			
Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	NC #														
	<i>Note: Extension of further landfilling activities beyond 20 years would be subject to further approvals applicable at the time.</i>		approval 10-0012 supersedes this condition and that further approval will be required to operate beyond 2024.																
Input Rate Variations																			
4	<p>The proposed landfill shall not exceed the annual input rates in Table 1 (<i>refer to Table in MOD 1</i>), unless otherwise approved by the Minister. The Minister shall give such approval if the need for additional capacity is demonstrated by an independent public assessment of landfill capacity and demand in the Sydney Region. The assessment shall:</p> <p>a) take into account the status of alternative technologies for putrescible waste management and be undertaken at five-yearly intervals;</p> <p>b) be completed one year before commencement of each five year period, as set out in Table 1, or at any other time at the request of the Applicant, with the first review due four years from the date of operational commencement; and</p> <p>c) be undertaken by an independent person or organisation, to be appointed by the Minister, with the costs to be funded by the Applicant.</p> <p>Table 1: Maximum Input Rates</p> <table><tr><th>Years from date of operational commencement</th><th>Maximum Input Rate (Received by Rail from the Sydney region)</th><th>Maximum Input Rate (Received by Road from surrounding LGAs)</th></tr><tr><td>0-5</td><td>400,000 tpa</td><td>0</td></tr><tr><td>6-10</td><td>360,000 tpa</td><td>50,000 tpa</td></tr><tr><td>11-15</td><td>325,000 tpa</td><td>50,000 tpa</td></tr><tr><td>16-20</td><td>290,000 tpa</td><td>50,000 tpa</td></tr></table>	Years from date of operational commencement	Maximum Input Rate (Received by Rail from the Sydney region)	Maximum Input Rate (Received by Road from surrounding LGAs)	0-5	400,000 tpa	0	6-10	360,000 tpa	50,000 tpa	11-15	325,000 tpa	50,000 tpa	16-20	290,000 tpa	50,000 tpa		Superseded by PA 10_0012.	
Years from date of operational commencement	Maximum Input Rate (Received by Rail from the Sydney region)	Maximum Input Rate (Received by Road from surrounding LGAs)																	
0-5	400,000 tpa	0																	
6-10	360,000 tpa	50,000 tpa																	
11-15	325,000 tpa	50,000 tpa																	
16-20	290,000 tpa	50,000 tpa																	
5	In any event, no more than 500,000 tonnes shall be landfilled at the site in any one year.		Superseded by PA 10_0012.																
Compliance with Requirements of the Director-General and Prescribed Conditions																			
6	The Applicant shall comply with all reasonable requirements of the Director-General in respect of the implementation of any measures arising from reports submitted in accordance with the	<ul style="list-style-type: none">Interview with Veolia	Veolia did not receive further requirements from the Department during the Audit Period.																

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	conditions of this consent, within such time as the Director- General may agree.	personnel, 17/03/2021			
7	The Applicant shall comply with all relevant conditions prescribed in Part 7 of the Environmental Planning and Assessment Regulation 1994, as required by Section 80A (11) of the Act.		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
Obligation to Prevent and Minimise Harm to the Environment					
8	The Applicant shall: a) take all practicable measures to prevent and minimise harm to the environment as a result of the construction, operation, post closure and, where relevant, the decommissioning of the development; and b) take all practicable measures to operate the landfill as a bioreactor, to ensure to the maximum extent practicable, the biological decomposition of all organic waste and productive capture of methane.	<ul style="list-style-type: none"> 2018 LEMP DPIE letter re. Woodlawn Bioreactor, Landfill Environmental Management Plan (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 Site visit and interview with Veolia personnel on 17/03/2021 	Operational measures are outlined in the LEMP and sub-plans. The updated 2018 LEMP has been approved by the DPE. In the Auditors opinion, Veolia has taken, and is taking, reasonable and practical measures to prevent and minimise harm to the environment as a result of operations of the facility. Post-closure and decommissioning requirements have not been triggered.	Compliant	
Structural Adequacy					
9	Detailed plans and specifications relating to the design and construction of all structural elements associated with the proposed development shall be submitted to the Principal Certifying Authority (PCA) prior to the commencement of construction works. Such plans and specifications shall be accompanied by certification provided by a practicing professional structural engineer or an		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	accredited certifier certifying the structural adequacy of the proposed building design and compliance with the Building Code of Australia (BCA).				
Verification of Construction					
10	<p>Upon completion of building works and prior to the issue of an occupation certificate, a certificate prepared by a suitably qualified person or a compliance certificate issued by an accredited certifier, is to be submitted to the PCA certifying that the following building components, where relevant, have been completed in accordance with approved plans and specifications:</p> <p>a) footings; b) concrete structures, including ground floor and any subsequent floors, and c) retaining walls and columns; d) framing and roof structure; e) fire protection coverings to building elements required to comply with the BCA; and f) mechanical ventilation.</p> <p>The certificate/s shall demonstrate at what stage of construction inspections were undertaken.</p>	<ul style="list-style-type: none"> Philip Chun, Occupation Certificate No. 18-210365oc1, 07/04/2021 [outside Audit Period] 	<p>The occupation certificate for the LTP indicates that compliance certificates were obtained in accordance with this Condition prior to issue of the occupation certificate, except for mechanical ventilation. The Auditors observe that the construction certificate indicated that mechanical ventilation would be installed where natural ventilation could not be provided.</p> <p>The certificate indicated that Section 162B Critical Stage Inspections for Footings, Stormwater and Final were conducted.</p> <p>On the basis of the above information, this Condition is considered compliant assuming that natural ventilation was adequate and therefore, mechanical ventilation was not required.</p>	Compliant	
Dispute Resolution					
11	In the event that the Applicant, Council, a government authority other than the Department or the PCA cannot agree on the specification or requirements applicable under this consent, the matter shall be referred by	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 		Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	either party to the Director-General or, if not resolved, to the Minister, whose determination of the disagreement shall be final and binding on the parties.				
ENVIRONMENTAL MANAGEMENT					
12	<p>Environmental Services</p> <p>The Applicant shall employ or contract suitably qualified environmental services throughout the duration of landfilling/construction and rehabilitation activities. The Applicant shall nominate an Environmental Management Representative/s (EMR/s) as the principle person responsible for overseeing environmental management of the project and supervision of environmental services. The EMR's/EMRs' qualifications, experience and appointment shall be to the satisfaction of the Director-General. The EMR/s shall have the authority to stop work if an adverse impact on the environment has occurred or is likely to occur.</p> <p>The EMR/s shall:</p> <ul style="list-style-type: none"> a) be responsible for the preparation or certification of all environmental b) management plans and procedures; c) be responsible for considering and advising on matters specified in the d) conditions of this consent and compliance with such matters; e) oversee the receipt of, and response to, complaints about the environmental performance of the project; f) facilitate an induction and training program in environmental awareness and responsibility required under the Environment Protection Licence (EPL), both generally and specific to the 	<ul style="list-style-type: none"> • IEA Information Requested 22 - 30 March 2021.xlsx 	The appointed EMR has not changed since the previous IEA and is not currently based at the Woodlawn site.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	Applicant's activities for all persons involved with construction, operation, monitoring and rehabilitation activities at all sites. The training program must be implemented annually from the commencement of the development and evaluated every three years; and g) be present on-site during any critical construction or operational activities as defined in the relevant Landfill Environmental Management Plan (LEMP).				
Landfill Environmental Management Plan					
13	Prior to the Applicant applying to the EPA for an EPL under the Protection of the Environment Operations Act 1997, the Applicant must prepare a comprehensive Landfill Environmental Management Plan (LEMP) in accordance with the EPA's <i>Environmental Guidelines: Solid Waste Landfills</i> . The LEMP shall incorporate all relevant plans and protocols as required by the conditions of this consent. The LEMP shall accompany the application for an EPL. (EPA GTA)		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
14	<i>Licence Applications</i> Prior to applying to the EPA for an EPL, the Applicant must be able to demonstrate that all works required to be addressed to ensure to geo-technical stability of the premises have been undertaken in accordance with a) the recommendations of the report prepared by BFP Consultants P/L, dated 17 December 1998, entitled Woodlawn Landfill – Geo-technical Study; and b) the requirements of the NSW Department of Mineral Resources. (EPA GTA)		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
15	The Applicant must prepare a post closure landfill rehabilitation management plan (PCLRMP). The PCLRMP must be documented in the LEMP and must address the following: a) closure strategies in the event that landfilling activities conclude prior to filling of the mine void; b) site capping and revegetation in accordance with benchmark technique 28 of the Environmental Guidelines: Solid Waste Landfills; c) post closure environmental monitoring; d) post closure management of surface water in the event that the void is not filled with waste. e) post closure management of Evaporation Dam No 3 (ED3); f) post closure leachate management, including the management of the g) bioreactor processes; h) post closure landfill gas management; i) post closure maintenance; and j) the estimated costing for these works must be provided and should be based on a nominal period of at least 50 years after the landfill ceases to accept waste. The actual duration of this period will be determined from actual monitoring data at the time. (EPA GTA)		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
Community Liaison Committee					
16	Prior to the commencement of construction, the Applicant shall establish a Community Liaison Committee (CLC) comprising representatives of the Applicant, the local community, Council and Supervisory Licensee. Representatives of relevant government agencies may be invited to attend meetings of the Committee as required. The Chairperson and procedures for		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	the Committee including frequency of meetings shall be determined by the Committee.				
Consultation with Tarago and District Progress Association Incorporated (TADPAI)					
16A	The Applicant shall meet quarterly with TADPAI representatives and provide updated information on odour incidents, leachate management and gas extraction and resolution of incidents related to the local community.	<ul style="list-style-type: none"> Woodlawn Eco-Precinct Community Liaison Committee Meeting Minutes, 12/11/2020 	A representative of TADPAI continues to attend the CLC meetings.	Compliant	
Annual Environmental Management Report					
17	In order to facilitate the integration of the environmental management of the subject land and the Woodlawn mine site, the Applicant shall liaise with the holder of the Woodlawn mining lease in relation to the formulation and review of the Annual Environmental Management Report (AEMR) for the mine. The AEMR shall comply with the requirements of the Director-General of the Department of Mineral Resources and be subject to review by all relevant government agencies.		This Condition has been superseded by PA 10_0012, Schedule 7, Condition 5.		
18	Conditions Compliance Reports The Applicant shall submit to the Secretary, the EPA, DoL L&W, Water NSW and Council Conditions Compliance Reports as follows: a) at least one month prior to the commencement of construction works for the purposes of landfilling, or within such period as otherwise agreed to by the Secretary; b) at least one month prior to the commencement of construction works for the purposes of the intermodal transfer facility, or	<ul style="list-style-type: none"> 2018 LEMP, including Appendix C, Condition Compliance Report For Woodlawn Bioreactor, Crisps Creek 	Parts a) and b) of this condition have been audited previously and are not relevant to the current Audit Period. A Compliance Report was last issued in July 2018. Therefore, this Condition is considered non-compliant as it has been more than two years since a Compliance Report was published.	Non-compliant	NC11

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>within such period as otherwise agreed to by the Secretary;</p> <p>c) every two years following the date of commencement of construction for the purposes of landfilling activity, or within such period as otherwise agreed to by the Director-General.</p> <p><i>Note: the requirements of a) and b) above may be satisfied by the same report if appropriate.</i></p>	<p>Intermodal Facility, 24/07/2018</p>	<p>The Auditors recommend that Veolia contact the Department to seek advice on whether the effort to prepare a Compliance Report at this time is required given that this IEA will be issued almost in parallel. Veolia can also seek advice on whether this Condition can be modified. Depending on the Department's requirement, Veolia should consider how best to ensure that future Compliance Reports are not missed. A suggestion may be to prepare a Compliance Reporting tracking register that contains all of the required management plans, audits and reporting obligations, as well as submission obligations so that deadlines may be tracked and document revisions, their issue to authorities/CLC and publication on the website can also be monitored to ensure deadlines are not missed.</p>		
Independent Environmental Audits					
19	<p>Every three years following the date of this consent, or at periods otherwise agreed to by the Secretary, and until such time as agreed to by the Secretary, the Applicant shall arrange for an independent audit of the environmental performance of the development. The audits shall:</p> <p>a) be conducted pursuant to ISO 14010 – Guidelines and General Principles for Environmental Auditing, ISO 14011 –</p>	<ul style="list-style-type: none"> Ramboll, Independent Environmental Audit, Woodlawn Bioreactor and Crisps Creek Intermodal 	<p>Veolia provided correspondence showing that the 2018 IEA report was submitted to Water NSW on the same day that the final IEA report was issued. However, Veolia could not provide similar correspondence showing that the 2018 IEA was submitted to DPIE, EPA, DoI L&W, Council and the Community Liaison Committee. This may be due to difficulty finding the correspondence</p>	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>Procedures for Environmental Monitoring and any specifications of the Director-General;</p> <p>b) be conducted by a suitably qualified independent person approved by the Secretary;</p> <p>c) assess compliance with the requirements of this consent;</p> <p>d) assess the implementation of the LEMPs and review the effectiveness of the environmental management of the development; and</p> <p>e) be carried out at the Applicants' expense.</p> <p>The audits shall be submitted to the Secretary, the EPA, DoI L&W, Water NSW, Council and the Community Liaison Committee.</p> <p>The Applicants shall comply with all reasonable requirements of the Secretary in respect of any measures arising from or recommended by the audits and within such time as agreed to be the Secretary.</p>	<p>Facility, 06/06/2018</p> <ul style="list-style-type: none"> • Veolia email to Water NSW, Re. Woodlawn Bioreactor and Crisps Creek Intermodal Facility Independent Environmental Audit (IEA) Report 2018, 06/06/2018 • DPIE Letter, Re. Woodlawn Bioreactor Expansion Project (MP10_0012), Audit Team Approval Request, 05/02/2021 	<p>due to changes in Veolia personnel since June 2018. The Ramboll Lead Auditor for the 2018 IEA recalled Veolia advising that the report, which included Veolia's response, had been submitted to DPIE. Veolia maintain that this Condition is compliant on the basis that: the IEA is made available on their project website; the requirement to submit the IEA to all of the specified stakeholders is not required under Condition 6, Schedule 7, PA 10_0012; and this Condition is superseded by Condition 6, Schedule 7, PA 10_0012. The Auditors find that this is reasonable on the basis of Condition 10, Schedule 3, PA 10_0012 (i.e. PA 10_0012 prevails over DA No. 31-02-99 in the event of any inconsistency) and therefore, consider this Condition to be compliant.</p> <p>The Auditors recommend as an opportunity for improvement that Veolia seek advice from DPIE as to which stakeholders the IEA reports are required to be submitted to.</p> <p>This Independent Environmental Audit (IEA) has been prepared to address Condition 7.6. The previous IEA site visits were conducted in March 2020 and the site visit for this IEA have also been completed in March 2021, three years later.</p>		

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			The Audit Team was endorsed by the Department on 05/02/2021. DPIE made no further requirements arising from the previous IEA during the Audit Period.		
SITE REHABILITATION					
Whole of Site Rehabilitation					
20	The filling of the Woodlawn mine void with waste and the final rehabilitation of the land subject to the DA shall be undertaken in a manner which is complementary with the rehabilitation of the Woodlawn mine site. Details of integrated rehabilitation shall be provided in the Rehabilitation Management Plan prepared in accordance with Condition 22.	<ul style="list-style-type: none"> 2018 LEMP 	The Closure and Remediation Management Plan incorporating the Post Closure Landfill Rehabilitation Management Plan is documented in the 2018 revised LEMP.	Compliant	
21	Activities associated with landfilling must not impede or limit the rehabilitation works on any part of the Woodlawn Mine site.		The Auditors have no reason to believe that this Condition is not being complied with.	Compliant	
Rehabilitation Management Plan					
22	The Applicant shall prepare and implement a Rehabilitation Management Plan (RMP) which addresses areas designated for revegetation and rehabilitation as well as areas deemed not to require such treatment. The RMP shall address, but not necessarily be limited to the following matters: a) clear identification of proposed the new rehabilitation works to be undertaken by the Applicant, details of the Woodlawn Mine site rehabilitation works being undertaken by the mine leaseholder, and a clear definition of the respective obligations of the parties;	<ul style="list-style-type: none"> 2018 LEMP 	<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period.</p> <p>The Closure and Remediation Management Plan incorporating the Post Closure Landfill Rehabilitation Management Plan is documented in the 2018 revised LEMP.</p>	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	b) an outline of financial arrangements for site rehabilitation works proposed in the plan; c) the rehabilitation standards to be adopted; d) a rehabilitation schedule (to be reviewed on a regular basis); e) a post-establishment maintenance and monitoring program for rehabilitated f) areas; g) procedures for the removal of all derelict buildings and infrastructure; h) closure strategies in the event that landfilling activities conclude prior to the i) capacity of the mine void being filled; and j) integration of rehabilitation works with the rehabilitation of the Woodlawn mine site. The RMP shall be included in the LEMP.				
23	The Applicant must obtain approval from the End of Mine Life Steering Committee and the EPA to disturb, obtain or use materials from the Woodlawn Mine site for the construction, operation and rehabilitation of the landfill, intermodal facility, haul roads and any other infrastructure at the premises.		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
24	The Applicant shall liaise with the holder of the Woodlawn mining lease in the preparation of a Mining Operations Plan (MOP) in accordance with the requirements of the Department of Mineral Resources	<ul style="list-style-type: none"> Heron Resources Ltd, Woodlawn Mine, SML20, Mine Operations Plan, August 2015 (https://www.heronresources.com.au/downloads/woodlawn/2015-09-15- 	This Condition was previously assessed and, therefore, not triggered in this Audit Period. The MOP is available on Heron's website.	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		HeronResources WoodlawnMine2 015MOP.pdf)			
25	<p><i>EPA Financial Assurance</i></p> <p>The Applicant shall provide to the EPA financial assurance commensurate with the ongoing environmental management and rehabilitation responsibilities for the landfill and associated activities. The financial assurance shall consist of:</p> <p>a) an unconditional and irrevocable bank guarantee, or other form of financial assurance acceptable to the EPA. The financial assurance is to be adjusted annually so that it keeps pace with inflation for so long as the EPA requires it to remain in place. The amount of the assurance will be determined by an independent review of the costings applicable to activities identified in the LEMP and Conditions 55 and 159; and</p> <p>b) an accumulating fund generated by monies set aside annually on deposit, or other form of financial assurance acceptable to the EPA which will have to be increased in a similar way, in respect of post closure works and responsibilities. The initial and ongoing annual deposit into this fund will be determined by an independent expert review of the costings applicable to activities identified in Condition 15.</p> <p>The financial assurance shall be maintained during the operation of the facility and thereafter until such time as the EPA notifies the Applicant in writing that it is satisfied that the premises have been appropriately rehabilitated and are environmentally secure.</p>	<ul style="list-style-type: none"> • EPA Email to Veolia, Re. 2018 Financial Assurance, 21/08/2018 • ANZ Guarantee No. DG368313418, Amendment No. 4, 29/08/2018 • EPA Email to Veolia, Re. 2019 Financial Assurance, 09/08/2019 • ANZ Guarantee No. DG368313418, Amendment No. 5, 29/08/2019 • EPA Email to Veolia, Re. Re: Waste Compliance – RWC - IN – 2020 – Veolia Environmental Services 	Evidence of a continuing financial assurance has been sighted. A copy of the 2020 Bank Guarantee was not provided but the Auditors have no reason to believe that it has not been obtained as agreed with the EPA.	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	Written approval must be obtained from the EPA for any changes to the financial assurance detailed in this condition.	(Australia) Pty Ltd - 2020 Financial Assurance, Calculations - EPL 11436, 24/08/2020			
WASTE SOURCES AND TYPES					
26	The Applicant shall ensure that: a) all waste received by rail at the Woodlawn Waste Management Facility is sourced from the Sydney Region; and b) all waste received by road at the Woodlawn Waste Management Facility is sourced from local government areas in the vicinity of the site (in accordance with DA31-02-99 Mod1).	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	All waste received at the Bioreactor via rail was from the Sydney Region. The majority of waste received by road appears to be sourced from LGAs in the vicinity of the site.	Compliant	
27	The only wastes that can be disposed of at the premises are as follows: a) inert waste and solid waste defined in Schedule 1 of the Protection of the Environment Operations Act 1997 or waste that is assessed and classified as inert or solid waste following the technical assessment procedure outlined in Technical Appendix 1 of the Waste Guidelines; b) asbestos waste (including asbestos waste in bonded matrix and asbestos fibre and dust waste resulting from the removal of thermal or acoustic insulating materials or from processes involving asbestos material, and dust from ventilation collection systems) disposed of in accordance with clause 29 (5) of the Protection		Refer to EPL 11436, L3.1. Waste classifications in this condition are no longer in use. Waste types that can be received at the premises and are approved by the EPA are specified in section L3 of EPL 11436.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	of the Environment Operation (Waste) Regulation 1996; c) tyres in accordance with the EPA's tyre disposal specification; and d) other types of waste as expressly approved by the EPA. <i>(EPA GTA)</i>				
WASTE MANAGEMENT PROCEDURES					
28	There shall be no storage of sludges nor overnight storage of containerised waste, on the intermodal facility site. This condition may be varied with the written approval of the EPA if it is required by police; and /or because the operation, personnel or equipment are endangered. <i>(EPA GTA)</i>		Refer to PA 10_0012, Condition 5.3.	Compliant	
Waste Transportation					
29	All containers must be designed, constructed and maintained to prevent the emission of offensive odour and be water tight to prevent the leakage of leachate from waste containers during transport and handling activities. <i>(EPA GTA)</i>		Refer to PA 10_0012, Condition 5.4	Compliant	
30	All pressure relief valves on the containers must be designed to meet the environmental requirements of condition 29. <i>(EPA GTA)</i>		Refer to EPL 11455, 05.3	Compliant	
31	A Quality Assurance Program must be developed and implemented to ensure compliance with Condition 29. The program must include but need not necessarily be limited to the following: a) Container integrity; b) Integrity and performance of rubber seals; c) Performance of mechanisms to filter and remove odour where required d) including cleaning and performance testing; and		Refer to PA 10_0012, Condition 5.4	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	e) Container cleaning. (EPA GTA)				
32	<u>Spillage Response</u> A protocol must be developed and implemented to manage incidents involving spillage of waste. The protocol must include but should not necessarily be limited to procedures identifying immediate cleaning of the site, disinfection and reporting protocols. (EPA GTA)	<ul style="list-style-type: none"> 2020 ERP 	<p>The ERP includes Emergency Response Procedures for spills of putrescible waste and a railway collision or derailment, and therefore, is considered compliant.</p> <p>The Auditors recommend as an opportunity for improvement, that the ERP provide an Emergency Response Procedure for a truck rollover and spill of waste on a public road. Also refer to PA 10_0012, Condition 151.</p>	Compliant	
32B	Prior to receipt of waste from adjoining local government areas via road outlined in DA31-02-99 Mod1, the Applicant shall prepare and implement a Transport Code of Conduct for the project to the satisfaction of the Director General. This protocol must: a) be prepared in consultation with the RTA, Goulburn Mulwaree and Palerang Councils, and be submitted to the Director-General for approval prior to the receipt of waste at the facility from adjoining local government areas via road; and b) describe the measures to be implemented to: -minimise the impacts of the Development on the local and regional road network including traffic noise; and - minimise conflicts with other road users e.g. school bus operators.		<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period.</p> <p>Refer to PA 10_0012, Condition 6.3.</p>	Not triggered	
Control of Incoming Wastes					
33	The Applicant must develop procedures to screen deliveries of waste to ensure compliance	<ul style="list-style-type: none"> 2018 LEMP 	Waste is only received from Veolia's Sydney waste transfer terminals (Clyde and Banksmeadow Transfer Terminals) and	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	with Condition 27. The procedure must be documented in the LEMP. <i>(EPA GTA)</i>		from regional clients. The specifications for permitted waste are included in the contracts with all clients. All clients are advised of the requirements in the event that unauthorised waste is received. Procedures are in place at Veolia's Sydney waste transfer terminals to screen waste prior to transport to Woodlawn, which is documented in Section 1.1.2 Auxiliary Operations in the LEMP.		
34	The Applicant shall use its best endeavours to ensure that all waste received at the intermodal facility is containerised.		This Condition has been superseded by Approval 10_0012.		
OPERATIONAL STAGING AND LANDFILL MANAGEMENT					
35	The Applicant shall prepare a landfilling schedule consistent with the concept detailed in figure 4.10 in the EIS. Details of the landfill schedule and shall be provided in the LEMP.	<ul style="list-style-type: none"> 2018 LEMP 	<p>This condition has been audited previously and is not relevant to the current Audit period.</p> <p>Section 1.3.7.4 of the LEMP indicates that the Waste Management Plan incorporates the Filling Schedule.</p>	Compliant	
Cover Material					
36	Cover material must be virgin excavated natural material, unless otherwise approved in writing by the EPA. <i>(EPA GTA)</i>		<p>Refer to PA 00_0012, Schedule 4, Condition 2.</p> <p>Refer to EPL 11436, Condition O6.8.</p>	Compliant	
37	Cover material must be of a quality that will not inhibit the biological decomposition of the landfilled waste. <i>(EPA GTA)</i>		Refer to EPL 11436, Condition O6.9.	Compliant	
38	Cover material must be applied to a minimum depth of 15 centimetres over all exposed landfilled waste, prior to ceasing operations at the end of each day, unless otherwise approved in writing by the EPA. <i>(EPA GTA)</i>		Refer to EPL 11436, Condition O6.10.	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
39	Cover material must be applied to a depth of 30 centimetres over surfaces of the landfilled waste which are exposed for more than 90 days, unless otherwise approved in writing by the EPA. <i>(EPA GTA)</i>		Refer to EPL 11436, Condition O6.11.	Compliant	
40	At least two weeks supply of cover material must be available at the premises under all weather conditions, unless otherwise approved in writing by the EPA. <i>(EPA GTA)</i>		Refer to EPL 11436, Condition O6.12.	Compliant	
Landfill Gas					
41	The Applicant shall ensure to the maximum practical extent the quantity of landfill gas that is collected and treated.		Refer to EPL 11436, Condition O6.15.	Compliant	
42	The Applicant must ensure that any flare, power station or other proposed landfill gas treatment or beneficial re-use system is designed to provide a destruction efficiency of hydrocarbons, organic air toxics and odours of not less than 98%. <i>(EPA GTA)</i>		This Condition was previously assessed and, therefore, not triggered in this Audit Period. No new flare, power station or other proposed landfill gas treatment or beneficial re-use system has been designed during the Audit Period. However, it will be relevant for the proposed installation of a new flare.	Not triggered	
43	The flare system must be designed, installed and operated so that hydrocarbons, organic air toxics and odours are destroyed in accordance with Condition 42. The system must be provided with automatic ignition system and automatic shut-off gas valve. Scrubbers or other suitable treatment must be provided if it is required to remove hydrogen sulfide in order to comply with Condition 42. The system must be installed progressively during the operation of the landfill. <i>(EPA GTA)</i>		This Condition was previously assessed and, therefore, not triggered in this Audit Period. However, it will be relevant for the proposed installation of a new flare.	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
44	Any landfill gas condensate must be collected and returned to the leachate recycling system. <i>(EPA GTA)</i>		Refer to EPL 11436, Condition O6.19.	Compliant	
45	The landfill gas extraction and utilisation system must be designed and installed to withstand forces created by the weight and settlement of waste in the landfill.		Refer to EPL 11436, Condition O6.20.	Not triggered	
46	All pipe work carrying landfill gas adjacent to the haul road must be designed and installed so it is protected from damage as a result of haulage activities. <i>(EPA GTA)</i>		Refer to EPL 11436, Condition O6.21.	Not triggered	
WATER QUALITY AND MANAGEMENT					
Waste Management Facility Site					
47	The premises and the activities carried out therein must not pollute surface water or groundwater. <i>(EPA GTA)</i>		Refer to EPL 11436, Condition L1.2.	Compliant	
Groundwater and Leachate Management					
48	The mine void must be managed to ensure the groundwater gradient directs groundwater flows towards the mine void, unless otherwise approved in writing by the EPA. <i>(EPA GTA)</i>		Refer to EPL 11436, Condition O6.2.	Compliant	
49	Maintenance of the groundwater gradient post closure of active landfill operations (including a period of after-care) must ensure that impact of any degraded residue from the landfill on groundwater represents no threat to human health or the environment.			Not triggered	
50	A leachate collection/storage/recirculation/treatment system must be designed, installed and operated to: a) accept other waste-waters and contaminated storm-waters generated as a result of the operation of the facility;		Refer to EPL 11436, Condition O6.3.	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	b) efficiently operate, notwithstanding the settlement of the waste; c) ensure that all liquid (including rainwater, surface water, groundwater and leachate) introduced into the waste is monitored to determine its chemical composition and quantity; d) ensure that liquid is not deliberately stored in the landfilled waste, unless it is necessary for the efficient decomposition of the landfilled waste. e) ensure that leachate can be recirculated within the biologically active zones of the landfilled waste; and f) comply with Conditions 48 and 8(b). Details of this system must be documented in the LEMP. (EPA GTA)				
51	A barrier system must be designed and installed on the surfaces identified in condition 52 to limit the quantity of groundwater flowing into the mine void and to contain leachate over the period of time that the landfilled waste poses a potential environmental risk. The system must be documented in the LEMP. (EPA GTA)	<ul style="list-style-type: none"> 2018 LEMP 2018 SWMP 2018 LMP 	Refer to EPL 11436, Condition O6.5. The barrier system is described in Section 3.1.16 of the SWMP, Sections 1.3.3 and 1.3.7.2 of the LEMP and Section 3.1.1 of the LMP.	Compliant	
52	The Applicant shall install the barrier system on the following surfaces of the mine void wherever these surfaces do not meet the performance requirements of Condition 53: a) the base and the top elevation of the mine void; and b) the localised joints, fracture zones and adits/portals.	<ul style="list-style-type: none"> 2018 LEMP 2018 SWMP 2018 LMP 	Refer to EPL 11436, Condition O6.5. The barrier system is described in Section 3.1.16 of the SWMP, Sections 1.3.3 and 1.3.7.2 of the LEMP and Section 3.1.1 of the LMP.	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
53	The barrier system must at least achieve the performance of a 900 mm thick recompacted clay liner with an in-situ coefficient of permeability of less than 10^{-9} metres per second.	<ul style="list-style-type: none"> 2018 SWMP 2018 LMP 	The barrier system is described in Section 3.1.16 of the SWMP and Section 3.1.1 of the LMP.	Compliant	
54	A Construction Quality Assurance Plan (CQAP) for the barrier system shall be prepared and included in the LEMP.	<ul style="list-style-type: none"> 2018 LEMP 2018 LMP 	<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period.</p> <p>The LMP provides details on the CQAPs prepared for the sealing works on the northern and southern mine adits.</p> <p>The LEMP references the Barrier System and Quality Assurance Plan, which is relevant for ongoing sealing works for joints and cracks in the Bioreactor walls.</p>	Not triggered	
55	<p>The Applicant shall prepare a Leachate Contingency Management Plan (LCMP) that addresses, but not necessarily be limited to the following matters:</p> <p>a) the removal of leachate from the waste and its treatment to remove any metals or compounds at concentrations which may inhibit the biological processes of the bioreactor landfill, prior to discharging the leachate back into the landfilled waste;</p> <p>b) the storage of leachate external to the landfilled waste in the mine void;</p> <p>c) method/s for removing leachate from the waste and disposing of it to ensure effective operation of the bioreactor landfill and to ensure that the groundwater gradient directs groundwater flows into the mine void;</p>	<ul style="list-style-type: none"> 2018 LEMP 2018 SWMP 2018 LMP DPIE letter re. Woodlawn Bioreactor, Landfill Environmental Management Plan (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 	<p>This Condition was previously assessed and, therefore, largely not triggered in this Audit Period.</p> <p>Section 4.5 of the LMP provides leachate contingency measures, although it provides limited detail.</p> <p>Section 3.1.19 of the SWMP discusses the water balance for the leachate and surface water storage dams. It indicates that a Water Management Simulation (WMS) was conducted in 2017 that "showed that water could be managed on the site till 2059 with the help of evaporators and construction of new effluent dam before Jan 2045 within the foot print of existing ED1."</p>	Not triggered	

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	<p>d) an estimate of the full costs for implementing each aspect of this plan. (EPA GTA);</p> <p>e) contingency measures in the event that the leachate storage dams reach capacity sooner than anticipated, this should include the provision for construction and operation of additional lined coffer dam(s) in ED1 to the satisfaction of the EPA; and</p> <p>f) contingency measures should the modelling as required by Condition 70G demonstrate that the dams will overflow.</p>				
55A	Prior to operation of the LTP, or as otherwise agreed by the Secretary, the Applicant must submit a revised LCMP to the satisfaction of the Secretary. The LTP is not permitted to operate until the revised LCMP is approved by the Secretary. The plan must be prepared in consultation with the EPA and Water NSW and include contingency measures should the leachate dams fill sooner than anticipated.		This Condition has been superseded by PA 10_0012 Schedule 4, Condition 18A. Section 4.5 of the LMP provides leachate contingency measures, although it provides limited detail.	Compliant	
55B	Should additional coffer dam(s) be required to be constructed as part of the LCMP the dam(s) must be designed constructed and maintained in accordance with Condition 70L to 70P.		This Condition has been superseded by PA 10_0012 Schedule 4, Condition 18AA.	Compliant	
56	The Applicant must not import water or other liquids into the mine void, unless otherwise approved by the EPA, except for first flush waters collected at the Intermodal Facility site and waters contained in ED3. (EPA GTA)		Refer to EPL 11436, Condition O6.7.	Compliant	
57	The Applicant shall develop a plan (known as bioreactor water management plan) which addresses the treatment of water, prior to any water being added (other than by direct	<ul style="list-style-type: none"> • 2018 LEMP • 2018 SWMP 	This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	

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	rainfall) to the landfilled waste. This plan shall be included in the LEMP.				
Surface Water Management					
58	There must be no discharge of waters from the area subject to the Development Application, unless more than 210mm of rain falls within a 72 hour time period (1 in 100 year ARI of 72 hours duration). (EPA GTA)		Refer to EPL 11436, Condition L1.3.	Compliant	
59	At the commencement of waste being received into the mine void the volume of water stored in ED3 shall be no greater than 40 ML.		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
60	The Applicant shall install drainage so that the West Ridge Catchment shall not drain into the mine void.		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
61	Contaminated water shall only be applied for dust suppression in the mine void, and in any areas around the perimeter of the void where any contaminated water will drain back into the void.		Refer to EPL 11436, Condition O5.3.	Compliant	
62	The evaporation of water by spraying shall not result in the drifting of the sprayed liquid from the area subject to the DA and also shall not cause any adverse impact to public health. The proposed method for the spray evaporation of water shall be documented in the LEMP.	<ul style="list-style-type: none"> 2018 LEMP 2018 SWMP 2018 LMP 	Refer to EPL 11436, Condition O5.4. Addressed in the LEMP, Section 4.2.8 of the SWMP and Section 3.1.3 of the LMP.	Compliant	
63	ED3 shall not receive water stored in the Waste Rock Dam.	<ul style="list-style-type: none"> 2018 SWMP 	The SWMP states that excess water from the Waste Rock Dam is diverted to ED1, not ED3.	Compliant	
64	Stormwater in the mine void must only be discharged into ED3S sump, for transfer via pipeline to ED2, or otherwise used for operational purposes within the landfill, as approved in writing by the EPA. (EPA GTA)	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Stormwater from the mine void is pumped to ED3S, as described in Section 3.1.6.2 of the SWMP. Veolia personnel advised that 50 ML stormwater from ED3S had been	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> 2018 SWMP 	transferred to ED2 during the Audit Period (refer to PA 10_0012, Schedule 4, Condition 18D). The Auditors understand that Veolia have not used mine void stormwater for operational purposes.		
65	Stormwater collected in the mine void may only be transferred into ED3S sump and ED2 provided that: a) The Applicant can always comply with condition 58; and c) the stormwater to be transferred contains no leachate, unless otherwise approved in writing by the EPA. (EPA GTA)	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 2018 SWMP 	<p>Stormwater from the mine void is only pumped directly to ED3S although it is understood that 50 ML stormwater was transferred from ED3S to ED2 during the Audit Period.</p> <p>It is understood that Condition 65(a) has not been triggered during the Audit Period. Based on the SWMP, stormwater collected in the mine void is managed so that if it comes into contact with the waste, it is managed as leachate. If it only comes into contact with the landfill cover or down the walls of the mine void, it is collected and transferred to Pond 3. Section 3.1.6.2 of the SWMP indicates that Pond 3 stormwater is tested for ammonia to assess whether it is suitable for discharge to ED3S (criterion of <15 mg/L Ammonia to be accepted for transfer to ED3S) and the samples are collected from the "transfer tanks".</p> <p>It is observed that the 2018 AEMR refers to Pond 3 as the transfer point but the 2019 and 2020 AEMRs refer to Pond 5 as the transfer point, which in EPL 11436 is referred to as Point 22. Veolia personnel advised that they have worked to increase</p>	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			<p>the capture and diversion of stormwater away from the waste and additional stormwater ponds have been constructed. However, these changes have not been reflected in the SWMP.</p> <p>The Auditors recommend as an opportunity for improvement that the SWMP be reviewed and revised to reflect current void stormwater management practices and EPL 11436 requirements.</p> <p>Consultation with the EPA indicated that the EPA was aware that mine void stormwater management had changed and it was unclear to the EPA where the stormwater is sampled prior to its transfer to ED3S and whether the management system is adequate for assessing compliance with this Condition. The Auditors consider that the SWMP is outdated and inconsistent with EPL 11436.</p> <p>The Auditors observe that in 2018, ammonia levels in Pond 3 (Point 22) quarterly samples ranged from 5.2 to 100 mg/L (mean 38 mg/L). The ammonia levels in Pond 5 (Point 22) ranged from 2.5 to 14.4 mg/L (mean 10 mg/L) in 2019 and in 2020 they ranged from 0.4 to 23.5 mg/L (mean 9 mg/L). During the Audit Period, the average ammonia concentrations in ED3S (Point 54) have ranged from 138</p>		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			mg/L in 2018, to 169 mg/L in 2019, down to 100 mg/L in 2020. The ammonia concentrations at Point 22 have exceeded the criterion for discharge to ED3S (<15 mg/L ammonia) indicating a less than perfect control measure. However, the mean ammonia levels have improved and were <15 mg/L in the 2019 and 2020 reporting periods. Hence, overall, it is considered that the control measures are considered adequate.		
66	The Applicant must design and implement a Stormwater Management Scheme for the premises demonstrating compliance with Conditions 47, 48, 58, 63, 64, 65, and 8(b). This plan must be documented in the LEMP. (EPA GTA)	<ul style="list-style-type: none"> 2018 LEMP 2018 SWMP 	Surface water management is described in Section 3.1.6 of the SWMP, which is also documented in the LEMP.	Compliant	
66A	Prior to operation of the LTP or as otherwise agreed by the Secretary, the Applicant must submit a revised Stormwater Management Plan to the satisfaction of the Secretary. The plan shall be prepared in consultation with the EPA and Water NSW and include the changes to water management in MOD2 and MOD3, in accordance with the requirement of Condition 66.	<ul style="list-style-type: none"> Refer to PA 10_0012, 4.17A 	Refer to PA 10_0012 Schedule 4, Condition 17A. A revised SWMP, which included the changes to water management in MOD2 and MOD3, was submitted to and approved by the Department prior to commissioning of the LTP. Evidence of consultation with EPA and Water NSW was available.	Refer to PA 10_0012, 4.17A	
66B	Prior to operation of the LTP or as otherwise agreed by the Secretary, the Applicant must submit a revised Management Plan for ED3N, ED3S, ED3S-S and coffer dam(s) to the satisfaction of the Secretary. The plan shall be prepared in consultation with the EPA and Water NSW and include the changes to water	<ul style="list-style-type: none"> 2018 LEMP 2018 SWMP 2018 LMP Veolia email to DPIE, cc to EPA 	Refer to PA 10_0012 Schedule 4, Condition 18A. A revised SWMP and a revised LMP were submitted to and approved by DPIE prior to commissioning of the LTP. The plans were	Refer to PA 10_0012, 4.18A	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	and leachate management in MOD2 and MOD3, in accordance with the requirement of Condition 70. The plan must be documented in the LEMP.	<p>and Water NSW, Re. Woodlawn Bioreactor Revised Management Plans, 24/03/2017, with attached 'Condition Compliance Report March 2017.pdf' and 'Reference Table for Comments.docx '</p> <ul style="list-style-type: none"> • Veolia email to DPIE, Subject: Email 1- Revised LEMP, LMP and SWMP -Woodlawn Bioreactor, 25/07/2018. • Email from DPIE to Veolia, Subject: Woodlawn Long-term leachate 	documented in the LEMP. Evidence of consultation with EPA and Water NSW was available.		

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>management LEMP LMP EPA Comments, 17/08/2018</p> <ul style="list-style-type: none"> EPA Letter to DPIE, Re. Review of proposed updates to Woodlawn Bioreactor Environmental Management Plans, 16/08/2018 DPIE letter re. Woodlawn Bioreactor, Landfill Environmental Management Plan (DA 31-02- 99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 			
66C	Should any additional coffer dam(s) in ED1 be required, the Applicant must submit revised management plans in accordance with Condition 70 and 70B to the satisfaction of the Secretary prior to any treated leachate being discharged to the coffer dam(s). The plans must be prepared in consultation with the EPA	<ul style="list-style-type: none"> 2018 LEMP 2018 SWMP 2018 LMP Veolia email to DPIE, cc to EPA and Water 	<p>Refer to PA 10_0012 Schedule 4, Condition 18AA.</p> <p>A revised SWMP and a revised LMP were submitted to and approved by DPIE prior to leachate being discharged to the Coffey Dam (also referred to in the LMP as ED1</p>	Refer to PA 10_0012, 4.18AA	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	and Water NSW and be documented in the LEMP.	<p>NSW, Re. Woodlawn Bioreactor Revised Management Plans, 24/03/2017, with attached 'Condition Compliance Report March 2017.pdf' and 'Reference Table for Comments.docx'</p> <ul style="list-style-type: none"> • Veolia email to DPIE, Subject: Email 1- Revised LEMP, LMP and SWMP -Woodlawn Bioreactor, 25/07/2018. • Email from DPIE to Veolia, Subject: Woodlawn Long-term leachate management 	Effluent Dam (ED1 ED)). The plans were documented in the LEMP. Evidence of consultation with EPA and Water NSW was available.		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>LEMP LMP EPA Comments, 17/08/2018</p> <ul style="list-style-type: none"> EPA Letter to DPIE, Re. Review of proposed updates to Woodlawn Bioreactor Environmental Management Plans, 16/08/2018 DPIE letter re. Woodlawn Bioreactor, Landfill Environmental Management Plan (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 			
67	Vehicles leaving the area subject to the DA shall not track materials to external surfaces. Details of the equipment or facilities must be specified in the LEMP (EPA GTA)	<ul style="list-style-type: none"> 2018 LEMP 2018 SWMP 	Refer to EPL 11436, Condition O6.24. Details on the wheel wash facility is documented in the LEMP and Section 4.1.3 of the SWMP.	Compliant	
68	Containers used for transporting waste must only be washed at the container wash facility as frequently as is necessary to minimise		Refer to EPL 11436, Condition O5.6.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	environmental impacts from the containers. The container wash down facility must be designed, installed and operated with the aim to collect, treat and dispose of any wash down waters to the leachate collection system. Any collected solids must be returned to the active tipping face. The container wash down facility must be documented in the LEMP. (EPA GTA)				
69	Impervious bunds must be constructed around all fuel, oil and chemical storage areas and the bund volume must be large enough to contain 110 per cent of the volume held in the largest container. The bund must be designed and installed in accordance with the requirements of the EPA Environment Protection Manual Technical Bulletin <i>Bunding and Spill Management</i> . (EPA GTA)		Refer to PA 10_0012, Conditions 4.15 and 5.13.	Compliant	
ED3 – Management					
70	The Applicant must prepare a management plan for ED3N, ED3S and ED3S-S to ensure that: a) each dam lined and is maintained to prevent the leakage from the dams in order to protect groundwater and surface water; b) a monitoring and inspection program is implemented including installation of monitoring bores, a review of monitoring data and six-monthly inspections to evaluate the integrity of the barrier and to assess if leakage from the dam is occurring; c) adequate capacity is retained in ED3N and ED3S to meet the environmental performance requirements in condition 58 d) measures are identified to maintain adequate capacity within a suitable time period after receiving water from a rainfall event;	<ul style="list-style-type: none"> 2018 LEMP 2018 SWMP 2018 LMP DPIE letter re. Woodlawn Bioreactor, Landfill Environmental Management Plan (DA 31-02-99 MOD 3 & MP 10_0012 MOD 2), 18/09/2018 2020 LWMS Audit 	<p>The LEMP, SWMP and LMP were revised in 2018 and the management of ED3 is documented in all three plans, although mainly in the LMP.</p> <p>Also Refer to PA 10_0012, Schedule 4, Condition 18T in relation to 70(h).</p> <p>The Auditors observe that the following aspects of this Condition are not adequately addressed in the aforementioned management plans, particularly the LMP:</p> <ul style="list-style-type: none"> Leak detection monitoring of <u>all</u> pipelines used to transfer leachate and treated leachate is not addressed, only the pipeline from the LTP to the Coffey Dam (ED1 ED). 	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>e) there is an emergency plan for the management of leachate in excess of the capacity of ED3N, ED3S and coffer dam(s);</p> <p>f) the sources of leachate that are collected or received in ED3N, ED3S and coffer dam(s) are identified; and</p> <p>g) the quantity of leachate from each source that reports to ED3N and ED3S is monitored and compared in graphical format with rainfall data.</p> <p>(h) ED3N is emptied of effluent from the existing leachate system by 31 December 2022;</p> <p>(i) all pipelines which transfer leachate and treated leachate are monitored to ensure leaks do not occur;</p> <p>j) the operational details of the LTP include:</p> <ul style="list-style-type: none"> (i) the leachate quality targets; (ii) a description of the performance indicators that would be used to judge the performance of the LTP; (iii) a description of the management measures that would be implemented to manage the operational impacts of the LTP including the chemical storage area and sludge skip bin; (iv) contingency measures to manage any unpredicted impacts such as the bioreactor membrane failing; and (v) the roles, responsibility, authority and accountability of all key personnel involved in the environmental management of the LTP. 		<ul style="list-style-type: none"> The leachate quality targets are not provided, unless the LTP effluent design values in Table 7 of the LMP are intended as targets, in which case this should be stated. The performance indicators are not clearly stated (again as opposed to design values, such as throughput capacity). The performance indicators should also include the indicators discussed in the monthly LTP reports (e.g. MLSS in biological process, throughput rate, effluent quality, foaming, sludge wasting, centrifuge performance, etc) and assessed relative to appropriate targets. <p>On the basis that the majority of the aspects in this Condition are met and Veolia have advised that they are in the process of reviewing and updating the management plans, this Condition is considered compliant. However, the Auditors recommend as an opportunity for improvement that the management plans and particularly, the LMP, be reviewed and revised to address all of the requirements of this Condition adequately.</p>		

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	k) An updated plan including MOD2 must be documented in the LEMP.				
70A	The Applicant must confirm in writing to the EPA and the Secretary the dam lining is in place (in accordance with Condition 70), prior to the discharge of treated leachate into ED3S-S. From the commencement of MOD 2, the Applicant shall provide quarterly updates to the EPA and the Secretary of the leachate volume in ED3S-S (southern lagoon) and the remaining storage volume.	<ul style="list-style-type: none"> 2018 SWMP, with attached Appendix B, - E2W, Woodlawn Bioreactor; Construction Quality Control Assurance for Lining Evaporation Dam (ED3SS), November 2015 to July 2016, 05/09/2016 2018 LMP 	<p>The LMP indicates that ED3SS "was lined with a 1.5 m thick dual clay liner system that was independently verified by report (Construction Quality Control Assurance for Lining Evaporation Dam (ED3SS), November 2015 to July 2016 prior to initial receipt of treated leachate".</p> <p>Correspondence from Veolia to the EPA and DPIE that confirmed that the ED3SS lining was in place, was not available. However, given that both the SWMP and LMP state that ED3SS was lined with supporting information in the Construction Quality Control Assurance report, and the revised management plans were submitted to the EPA and DPIE, the Auditors consider this aspect of this Condition compliant.</p> <p>However, quarterly updates to the EPA and DPIE of the leachate volume in ED3SS and remaining volume were not available. On the basis of the above information, this Condition is considered non-compliant. The Auditors recommend that Veolia provide quarterly updates to the EPA and DPIE.</p>	Non-compliant	NC12
70B	The Applicant must prepare a management plan for ED2 to ensure that:	<ul style="list-style-type: none"> Interview with Veolia 	Refer to PA 10_0012, Schedule 4, Condition 18D.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>(a) only mine void stormwater that does not contain leachate and direct rainfall and runoff is received and stored within ED2:</p> <p>(b) the dam is lined and maintained to prevent the leakage of stored acid mine drainage waters in order to protect groundwater surface water:</p> <p>(c) a monitoring and inspection program is implemented including installation of monitoring bores, a review of monitoring data and six-monthly inspections to evaluate the integrity of the barrier and to assess if leakage from the dam is occurring:</p> <p>(d) adequate capacity is maintained in ED2 to meet the environmental performance requirements in Condition 58;</p> <p>(e) measures are identified to maintain adequate capacity within a suitable time period after receiving water from a rainfall event:</p> <p>(f) there is an emergency plan for the management of water in excess of the capacity of ED2:</p> <p>(g) that sources of water that are collected or received in ED2 are identified; and</p> <p>(h) the quantity of water from each source that reports to ED2 is monitored and compared in graphical format with rainfall data.</p> <p>The plan must be prepared in consultation with the EPA and submitted to the Secretary for approval within two months of the date of approval for MOD 2 or as otherwise agreed by the Secretary. The revised plan shall be documented in the LEMP.</p>	<p>personnel, 17/03/2021</p> <ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 IEA Information Requested 22 - 30 March 2021.xlsx Veolia Letter to EPA Re: Condition U2.1 of EPL 11436 – Management Plan – Evaporation Dam Seepage, 28/09/2018 Earth2Water, Veolia, Woodlawn Bioreactor – EMP for ED1 & ED2, 27/09/2018 Veolia, Annual Report, Assessment of Environmental Performance – 	<p>Veolia personnel advised that 50 ML stormwater from ED3S was transferred to ED2 during the Audit Period.</p> <p>The EMP for ED1 and ED2 (E2W, 2018) does not address the requirements of this Condition but provides advice on further investigations and potential solutions to address seepage issues.</p> <p>Section 3.1.7.2, SWMP describes how ED2 will be managed, which generally meets the requirements of this Condition, and therefore, this Condition is considered compliant.</p>		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 05/11/18 (2018 AEPR)</p> <ul style="list-style-type: none"> • Veolia, Annual Report, Assessment of Environmental Performance – Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 04/11/19 (2019 AEPR) • Veolia, Annual Report, Assessment of Environmental Performance – Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 04/11/20 (2020 AEPR) 			

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> Heron Resources Limited, Woodlawn Mine SML20 Annual Review, July 2018 to June 2019, 31/08/2019 			
70C	<p>Seepage or leakage points in ED2 must be identified and repaired to the satisfaction of the Secretary and EPA prior to the transfer of any stormwater from ED3S to ED2.</p> <p><i>Note: Conditions pertaining to ED2 will be triggered only in the event of transfer of water from ED3S to ED2.</i></p>		Refer to PA 10_0012, Schedule 4, Condition 18D.	Not triggered	
70D	<p>The Proponent must develop and implement a Longterm Leachate Management Strategy that:</p> <ul style="list-style-type: none"> Minimises the generation leachate at the premises; Captures, treats and disposes of all leachate generated at the premises; Maintains leachate levels in the waste mass to a level that does not inhibit the efficiency of the landfill gas extraction system; Progressively removes all treated leachate from ED3; and Minimise the emission of offensive odours from leachate treated and stored onsite so that there is no off site impact. <p>The Longterm Leachate Management Strategy must be submitted to the Secretary and the EPA (for inclusion as a Pollution Reduction Program attached to environment protection</p>		Refer to PA 10_0012, Schedule 4, Condition 18B.	Not triggered	

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	licence 11436) for approval within two months of the approval date of MOD 2.				
70E	Treated leachate must not be discharged to any part of ED3S, other than ED3S-S, until such time as the Long Term Leachate Management Strategy has been approved by the Secretary and the EPA.		Refer to PA 10_0012, Schedule 4, Condition 18C.	Not triggered	
70F	The Longterm Leachate Management Strategy must be operational no later than 30 September 2018, or as otherwise agreed by the Secretary.		Refer to PA 10_0012, Schedule 4, Condition 18E. Refer to EPL 11436, Condition U1.1.	Refer to PA 10_0012, 4.18E	Refer to NC4
<u>Future Modelling</u>					
70G	Prior to the operation of the LTP, the Applicant must provide modelling which demonstrates that the evaporation dams will not overflow for the period between 2029 to 2058. Should overflow be predicted, the Applicant must provide contingency measures in accordance with Condition 55A.	<ul style="list-style-type: none"> 2018 SWMP 	Refer to 31-02-99, Condition 55. Section 3.1.19 of the SWMP discusses the water balance for the leachate and surface water storage dams. It indicates that a Water Management Simulation (WMS) was conducted in 2017, which was prior to the operation of the LTP, that "showed that water could be managed on the site till 2059 with the help of evaporators and construction of new effluent dam before Jan 2045 within the foot print of existing ED1."	Compliant	
<u>Leachate Treatment Plant</u>					
70H	The Applicant must construct the Leachate Treatment Plant (LTP) and associated infrastructure in accordance with the Construction Environment Management Plan prepared by Veolia dated 12 December 2017.		Refer to PA 10_0012, Schedule 4, Condition 18F.	Compliant	

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70I	All run-off during construction must be contained on the site in accordance with Condition 58.		Refer to PA 10_0012, Schedule 4, Condition 18G.	Compliant	
70J	The LTP must be: (a) capable of processing at least 4 litres per second of leachate; and (b) bunded to contain 110 % of the facilities largest sized tank.		Refer to PA 10_0012, Schedule 4, Condition 18H.	Compliant	
70K	The sludge skip bin must be bunded and covered to prevent contaminants entering surface water.		Refer to PA 10_0012, Schedule 4, Condition 18I.	Compliant	
<u>Coffer Dam(s)</u>					
70L	Treated leachate must not be discharged to any part of ED1, other than within lined coffer dam(s).		Refer to PA 10_0012, Schedule 4, Condition 18J.	Compliant	
70M	The coffer dam(s) in ED1 must be designed and constructed: (a) by a suitably qualified and experienced person(s); (b) based on a geotechnical investigation and any recommendations prepared by a suitable qualified person(s); and (c) ensuring that all coffer dam(s) are lined with a High Density Polyethylene liner to the satisfaction of the EPA and in consultation with Water NSW.		Refer to PA 10_0012, Schedule 4, Condition 18K.	Compliant	
70N	The Applicant must provide works-as-executed drawings signed by a registered surveyor demonstrating that the coffer dam(s) have		Refer to PA 10_0012, Schedule 4, Condition 18L.	Compliant	

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	been constructed in accordance with the design required by Condition 70M. The Applicant must submit the works-as-executed drawings to the EPA, Water NSW and Secretary prior to the discharge of treated leachate into the coffer dam(s).				
70O	Prior to the discharge of treated leachate into any coffer dam(s) in ED1, the Applicant must confirm in writing and provide a quality assurance report to the EPA, Water NSW and the Secretary that the High Density Polyethylene dam lining has been adequately installed. From the commencement of discharge of treated leachate into the coffer dam(s), the Applicant shall provide quarterly updates to the EPA, Water NSW and the Secretary of the leachate volume in the coffer dam(s) and the remaining leachate storage volume.		Refer to PA 10_0012, Schedule 4, Condition 18M.	Refer to PA 10_0012, 4.18M	Refer to NC5
70P	Prior to the discharge of treated leachate to any coffer dam(s), the Applicant must install a leak detection system which monitors flows along all pipelines which carry leachate. Any leaks must be investigated, contained and rectified.		Refer to PA 10_0012, Schedule 4, Condition 18N.	Compliant	
70Q	Only treated leachate from the LTP is permitted to be stored within coffer dam(s) in ED1, unless otherwise agreed to by the Secretary.		Refer to PA 10_0012, Schedule 4, Condition 18O.	Compliant	
70R	The coffer dam(s) are not permitted to exceed 80 per cent capacity until either: (a) a new coffer dam(s) has been designed and constructed in accordance with condition 70M to 70P and is ready to accept treated leachate from the LTP and a revised management plan		Refer to PA 10_0012, Schedule 4, Condition 18P.	Compliant	

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	has been submitted to the satisfaction of the Secretary in accordance with Condition 70; or (b) sections of ED3N have been emptied of partially treated leachate, had its liner assessed and, if necessary, repaired, and is capable of receiving treated leachate from the LTP.				
70S	No interaction between the treated leachate in the coffer dam(s) and the mine stormwater in ED1 is permitted.		Refer to PA 10_0012, Schedule 4, Condition 18Q.	Compliant	
70T	Within six months of commissioning the LTP and annually thereafter, unless otherwise agreed to by the Secretary, the Proponent shall commission and pay the full cost of an independent assessment of the leachate and water management system. This audit must be conducted by a suitably qualified, experienced and independent expert whose appointment has been endorsed by the Secretary. During the audit, this expert must: (a) consult with the EPA, Water NSW and the Secretary; (b) assess actual performance against the assumptions and predictions made in the project water balance prepared by WSP dated September 2017. This must include: (v) actual versus predicted inputs and outputs into and out of each dam; (vi) actual versus predicted mechanical evaporation from each dam; (vii) actual versus predicted rainfall and evaporation; and (viii) the actual versus predicted		Refer to PA 10_0012, Schedule 4, Condition 18R.	Compliant	

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	<p>volume of water or treated leachate stored in each dam.</p> <p>(c) assess actual versus predicted performance of the LTP. This must include:</p> <p>(iii) actual versus target effluent quality; and</p> <p>(iv) actual versus target throughput.</p> <p>(d) determine whether the leachate and water management system is achieving its intended objectives; and</p> <p>(e) outline all reasonable and feasible measures that may be required to improve water and leachate management at the site.</p>				
70U	The volume of mine water stored in ED1 must be no more than 10 ML by 31 December 2023.		Refer to PA 10_0012, Schedule 4, Condition 18S.	Compliant	
70V	ED3N must be emptied of effluent from the existing leachate system by 31 December 2022.		Refer to PA 10_0012, Schedule 4, Condition 18T.	Compliant	
70W	Prior to discharging treated leachate into sections of ED3N from the LTP, the Applicant must verify the integrity of the dam and prepare an integrity assessment of the ED3N liner to demonstrate the dam is not leaking and is suitable for the storage of treated leachate.		Refer to PA 10_0012, Schedule 4, Condition 18U.	Not triggered	
70X	Should the integrity assessment identified in Condition 70W find that the liner in ED3N is not adequate for treated leachate storage, the Applicant must submit management options to		Refer to PA 10_0012, Schedule 4, Condition 18V.	Not triggered	

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	the Secretary, the EPA and Water NSW which will be adopted to rectify any integrity issues.				
70Y	The Applicant must not store treated leachate from the LTP in ED3N until the Secretary and the EPA are satisfied that either ED3N is not leaking or the management options identified in Condition 70X are acceptable.		Refer to PA 10_0012, Schedule 4, Condition 18W.	Not triggered	
Waste-water Management					
71	<p>The sewage management system must be designed, installed and operated to meet the following criteria:</p> <p>a) Prevention of Public Health Risk. Unacceptable public health risks must not occur resulting from human contact with the waste-water or flows discharged from the waste-water management system. Indicator faecal coliforms must be reduced to acceptable levels by an acceptable disinfection method determined in consultation with the EPA and NSW Department of Health. Consultation must be undertaken with NSW Health on the performance of the system.</p> <p>b) Protection of Lands. The application of waste-water to land must not result in the deterioration of the quality of the land through soil structure degradation, salinisation, waterlogging, chemical contamination or soil erosion.</p> <p>c) Protection of Surface Waters. Surface waters must not become contaminated by any flows discharged from the waste-water management system including waste-water, rainfall runoff, contaminated subsurface runoff or contaminated groundwater.</p>	<ul style="list-style-type: none"> Ramboll, Independent Environmental Audit, Woodlawn Bioreactor and Crisps Creek Intermodal Facility, 06/06/2018 2018 SWMP 2018 AQGGMP 	<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period.</p> <p>The sewage system is located near the gatehouse and is regulated by the Goulburn-Mulwaree Council. The sewage management scheme is described in the SWMP and the AQGGMP.</p>	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>d) Protection of Groundwaters. Underground water resources must not become contaminated by either the waste-water, or any flows discharged from the waste-water management system.</p> <p>e) Community Amenity. Unreasonable interference and nuisance to the public, due to odour, dust, insects, and noise above existing background levels and arising from the operation of the waste-water management system must be avoided.</p> <p>f) Resource Utilisation. The useful resources of waste-water, including nutrients, organic matter and water must be identified and utilised to the maximum extent possible within the bounds posed by the other environmental and health performance criteria referred to in (a) to (e) above. <i>(EPA GTA)</i></p>				
72	Waste-water must only be applied to utilisation areas in conformance with Condition 71. <i>(EPA GTA)</i>	<ul style="list-style-type: none"> 2018 SWMP 	The SWMP indicates that "Treated effluent is disinfected and pumped to a small spray irrigation area adjacent to the system for evaporation. The aim of this is to maintain a moist surface without waterlogging the area, causing potential runoff." The wastewater is applied to prevent run-off. The Auditors have no reason to believe this Condition was not met.	Compliant	
73	Spray from waste-water application must not drift beyond the boundary of the waste-water utilisation area to which it is applied. <i>(EPA GTA)</i>		The Auditors did not observe evidence of spray drifting from the site. No complaints or records of non-compliance have been received regarding spray drifting beyond the required area.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
74	Waste-water utilisation areas must effectively utilise the waste-water applied to those areas. This includes the use for pasture or crop production, as well as ensuring the soil is able to absorb the nutrients, salts, hydraulic load and organic materials in the solids or liquids. Monitoring of land and receiving waters to determine the impact of waste-water application may be required by the EPA. (EPA GTA)		The SWMP does not indicate whether the wastewater is being effectively utilised. EPL 11436 does not specify monitoring requirements in relation to the wastewater.	Compliant	
Intermodal Facility Site					
75	The Applicant shall prepare and implement a Stormwater Management Scheme for the premises in accordance with the environment protection licence. The Scheme shall include measures to mitigate the impacts of stormwater run-off from and within the premises following the completion of construction activities and meet Condition 76 (EPA GTA)	<ul style="list-style-type: none"> 2016 IMF EMP 	<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period.</p> <p>Surface water management is addressed in Section 3.4.2.3 of the IMF EMP.</p>	Not triggered	
76	Container handling, transfer and storage areas including any hardstand areas must be paved and sealed and be provided with a first flush stormwater management system designed to capture 15mm of stormwater for each square meter of catchment area. The paved and sealed areas including first flush system must also extend to include any rail unloading areas, stormwater detention pond, oil/water separator and container loading areas. (EPA GTA)		Refer to EPL 11455, Condition O6.1.	Compliant	
77	There must be no discharge of contaminated stormwater from the premises under dry weather conditions or storm event(s) of less than 1:100 year, 24 hour duration, average recurrence interval. (EPA GTA)	<ul style="list-style-type: none"> Site visit and interview with Veolia personnel on 17/03/2021 	No contaminated stormwater has reportedly been discharged from the site during the Audit period. Stormwater is diverted to onsite first flush system for storage and	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			testing. If stormwater is found to be contaminated, it is disposed of at the Bioreactor. Refer to EPL 11455, Condition O6.3.		
78	All areas that involve the handling of containerised waste including container transfer and handling areas, clean container storage areas and internal roadways must be sealed. <i>(EPA GTA)</i>		Refer to EPL 11455, Condition O6.2.	Compliant	
	<u>Waste Water Management</u>				
79	Contaminated stormwater and any sludges collected at the Crisps Creek intermodal facility must be disposed of at the landfill site. <i>(EPA GTA)</i>		Refer to EPL 11455, Condition O6.3.	Compliant	
80	There must be no vehicle or container wash down at the premises. <i>(EPA GTA)</i>		Refer to EPL 11455, Condition O6.4.	Compliant	
81	The on-site sewerage waste water management system must be designed installed and operated in a manner consistent with the guidelines Environment and Health Protection for On-site Sewage Management for Single Households. <i>(EPA GTA)</i>	<ul style="list-style-type: none"> 2016 IMF EMP 	<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period.</p> <p>Section 3.4.2.5 of the IMF EMP indicates that the IMF has a composting toilet that is cleaned out as required by a septic services contractor for off-site disposal of the solid material.</p>	Compliant	
Rivers and Foreshore Improvement Act 1948 – Part 3A Permit (DLWC GTAs)					
<u>General</u>					
82	If any work is being carried out in such a manner that it may damage or detrimentally affect the stream, or damage or interfere in any way with any work, the operation on that		Primarily related to construction of the facility.	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	section of the stream shall cease immediately upon the oral or written direction of the officer.				
83	The Applicant may request in writing any reasons for any direction to cease operations which must be provided within 24 hours of such a request.		Primarily related to construction of the facility.	Not triggered	
74	If the permit conditions have been breached, the permit holder shall restore the site to the satisfaction of the Department. If the necessary works are not completed then the permit holder shall pay a fee prescribed by the Department for the initial breach inspection and all subsequent breach inspections.		Primarily related to construction of the facility.	Not triggered	
85	Operations shall be conducted in such a manner as not to cause damage or increase the erosion of adjacent stream banks. The permit holder shall carry out any reasonable instructions given by DLWC with a view to preventing damage to the banks.		No evidence of significant erosion of stream beds was observed. No instruction have been received during the Audit Period.	Compliant	
86	Any vegetation or other material removed from the area of operations shall be disposed of to an appropriate site where the debris cannot be swept back into the river during a flood.		Primarily related to construction of the facility.	Not triggered	
Conditions Specific to the DA					
87	Operations shall be conducted in such a manner that is in accordance with the permit as not to cause damage or increase the erosion of adjacent stream banks. The permit holder shall carry out any reasonable instructions given by DLWC with a view to preventing damage to the banks.		Refer to MP 31-02-99, Condition 85.	Compliant	
88	Prior to the commencement of construction, the Applicant shall submit for the approval of DLWC a Soil and Water Management Plan. The Plan shall be prepared by a suitably qualified person and shall cover all works in and near the		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	stream, staging and maintenance requirements. The Plan shall meet the requirements outlined in the NSW Department of Housing's publications (1998) <i>Managing Urban Stormwater: Soils and Construction</i> and <i>Managing Urban Stormwater: Treatment Techniques</i> .				
89	The Applicant shall establish, to the satisfaction of DLWC, a riparian zone on the intermodal facility side of the Mulwaree River for the length of the intermodal facility and any associated works. The riparian zone shall be at least 40 metre in width (measured horizontally from the top of the bank) and consist of local native plant species but shall exclude bridge approaches, bridge, access roads and associated infrastructure in accordance with the Intermodal Construction Works Plan, and Soil and Water Management Plan		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
90	No exotic trees are to be planted within the stream or within 40 metres from the top of the bank of the stream.		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
91	Prior to commencing construction works the Applicant shall prepare to the satisfaction of DLWC a "Works Plan" to include Stream Rehabilitation and Vegetation Management. The Plan shall describe the proposed rehabilitation of the stream wherever disturbed, methods to stabilise the bed and banks of the stream, vegetation to be retained, additional plantings of local native vegetation, vegetation maintenance and performance criteria		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
92	The Applicant shall ensure that the design of the bridge over the Mulwaree River is sensitive to the corridor functions (including current and future functions) of the river and piered		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	approaches or equivalent are to be incorporated into the design.				
93	Drainage lines to the Mulwaree River are to be in accordance with the requirements of DLWC and designs included in the Intermodal Facility Works Plan are to be approved by DLWC prior to the commencement of construction works.		This Condition was previously assessed and, therefore, not triggered in this Audit Period.	Not triggered	
NOISE					
Hours of Construction and Operation					
Construction					
94	All construction work at the waste management facility and intermodal facility site that creates audible noise at residential premises must only be conducted between 7:00 am to 6:00 pm on Mondays to Fridays and between the hours of 8:00 am to 1:00 pm on Saturdays. There shall be no construction activities on Sundays or public holidays. <i>(EPA GTA)</i>		Construction of the LTP was completed at the beginning of the Audit Period. The Auditors have no reason to believe the condition is not being met.	Compliant	
95	The delivery of material outside the hours of operation permitted by Condition 94 may take place if that delivery is required by police or other authorities for safety reasons; and/or because the operation, personnel or equipment are endangered. In such circumstances, prior notification is to be provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of an emergency. <i>(EPA GTA)</i>		Construction of the LTP was completed at the beginning of the Audit Period. The Auditors have no reason to believe the condition is not being met.	Compliant	
96	The hours of construction specified in Condition 94 may be varied with the written consent of the EPA if the EPA is satisfied that the amenity of the residents in the locality will not be adversely affected. <i>(EPA GTA)</i>		Construction of the LTP was completed at the beginning of the Audit Period. The Auditors have no reason to believe the condition is not being met.	Compliant	
Operation					

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
97	All operational activities at the waste management landfill site may only be conducted between the hours of 6:00am and 7:00pm on Mondays to Saturdays and at the intermodal facility site including road haulage, may only be conducted between the hours of 7:00am to 6:00pm on Mondays to Saturdays other than train operations which may be conducted from 6:00am to 6:00pm. There must be no activities on Sundays, Good Friday or Christmas Day (Commission of Inquiry Report, January 2000). <i>(EPA GTA)</i>		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 20 and Schedule Condition 17. Also refer to EPL 11436, Condition L5.1. Also refer to EPL 11455, Condition L4.1	Compliant	
98	The hours of operation specified in Condition 97 may be varied with the written consent of the EPA if the EPA is satisfied that the amenity of the residents in the locality will not be adversely affected. <i>(EPA GTA)</i>		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 20 and Schedule 5, Condition 17. Also refer to EPL 11436, Condition L5.3.	Compliant	
Noise Limits					
Waste Management Facility Site					
99	Noise from the premises must not exceed an LA10 (15 minute) noise emission criterion of 35 dB(A) LA10 (15 minute) at the most affected residential receiver. <i>(EPA GTA)</i>		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 19. Also refer to EPL 11436, Condition L4.	Compliant	
100	The noise emission limits identified in Condition 99 apply for prevailing meteorological conditions, except under conditions of temperature inversions. Noise impacts that may be enhanced by temperature inversions must be addressed by: a) documenting noise complaints received to identify any patterns of temperature b) inversions or increased level of impacts from temperature inversions;		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 19. Also refer to EPL 11436, Condition L4.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	c) where levels of noise complaints indicate a higher level of impact then actions to quantify and ameliorate any enhanced impacts under conditions of temperature inversions should be developed and implemented. <i>(EPA GTA)</i>				
<u>Intermodal Facility Site</u>					
101	Except as provided in Condition 102, noise from the premises must not exceed an LA10 (15 minute) noise emission criterion of 35 dB(A) at the most affected residential receiver. <i>(EPA GTA)</i>		This Condition has been superseded by PA 10_0012, Condition 5.15. Also refer to EPL 11436, Condition L3.	Compliant	
102	Noise emissions from freight trains entering and leaving the premises must not exceed the noise limit of 45 dB(A) LA10 (15 minutes) prior to 7am and 50 dB(A) LA10 (15 minutes) after 7am. These limits apply only where there are no more than two freight trains entering and leaving the premises per day, otherwise the limit in condition 101 applies. <i>(EPA GTA)</i>		This Condition has been superseded by PA 10_0012, Condition 5.16. Also refer to EPL 11436, Condition L3.	Compliant	
103	Noise from the premises is to be measured at the most affected residential receiver to determine compliance with Conditions 101 and 102. <i>(EPA GTA)</i>		This Condition has been superseded by PA 10_0012, Condition 5.15. Also refer to EPL 11436, Condition L3.	Compliant	
104	The noise emission limits identified in conditions 101 and 102 apply for prevailing meteorological conditions, except under conditions of temperature inversions. Noise impacts that may be enhanced by temperature inversions must be addressed by: a) documenting noise complaints received to identify any higher level of impacts or patterns of temperature inversions; and b) where levels of noise complaints indicate a higher level of impact then actions to quantify and ameliorate any enhanced impacts under		This Condition has been superseded by PA 10_0012, Condition 5.15. Also refer to EPL 11436, Condition L3.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	conditions of temperature inversions should be developed and implemented. <i>(EPA GTA)</i>				
Noise Management					
105	The Applicant shall prepare and implement a Road Traffic Noise Management Protocol. The Applicant shall aim to meet the noise criteria set out in the EPA's <i>Environmental Guidelines for Road Traffic Noise</i> . The Protocol shall include, but not necessarily be limited to details about: a) scheduling movements outside critical time periods (for example, 6:00am to 7:00am); b) more stringent limits for noise emission from vehicles (eg. using specially designed "quiet" trucks and/or trucks required to use air bag suspension); c) driver education; d) limiting usage of exhaust brakes; e) type of road surface; f) in consultation with Mulwaree Shire Council exploring opportunities to reduce speed limits for trucks; g) regular maintenance of road surface; h) ongoing community liaison to monitoring complaints; and i) phasing in the increased road use; and j) options for overnight parking of haulage trucks.		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 12.	Compliant	
106	The Applicant, with input from the rail service provider, shall prepare and implement an Operational Noise Management Protocol for the Intermodal facility. The Protocol shall include, but not necessarily be limited to details about: a) the incorporation of all reasonable and feasible noise mitigation methods for trains entering the site from the main line, shunting,	<ul style="list-style-type: none"> 2016 IMF EMP Pacific National, Code of Conduct, Veolia Rail Operations 	This Condition was previously assessed and, therefore, not triggered in this Audit Period. The Code of Conduct is attached to the 2016 IMF EMP.	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	rail movements on site, container movements, and truck movements; b) scheduling of train movements outside critical time periods; c) using the quietest trains possible; d) employee education; e) using quiet couplings for trains f) using quiet forklifts; g) regular maintenance of rail track, roads, hard stand areas, equipment; h) ongoing community liaison to monitoring complaints (eg. complaints line); and i) negotiated agreements for noise complaints if noise issues become unresolvable.				
107	A Construction Noise Management Protocol must be prepared and submitted with the LEMP and implemented by the Applicant. The Protocol must include but is not necessarily limited to details about: a) compliance standards; b) community consultation; c) complaints handling monitoring/system; d) site contact person to follow up complaints; e) mitigation measures; f) the design and operation of the proposed mitigation methods demonstrating g) best practice; h) construction times; i) contingency measures where noise complaints are received; and j) monitoring methods and programs.		Primarily related to construction of the facility.	Not triggered	
NOISE IMPACTS					
Consultation with Pylara Pty Ltd					
108	In the event that Pylara Pty Ltd considers that road traffic noise (relating to the subject development) at any dwelling on its property is		This Condition was previously assessed and, therefore, not triggered in this Audit	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	in excess of relevant noise criteria set out in this consent, the Applicant shall, upon a written request from Pylara: a) undertake direct consultation with Pylara Pty Ltd on the issues raised; b) make arrangements for and fund an independent noise investigation to c) quantify noise levels and sources; and if adverse impacts are identified, modify where practicable road transport operations in order to mitigate such impacts.		Period. Veolia purchased Pylara property in 2001.		
	Land Acquisition				
109	Within six months of receipt of a written request from Pylara Pty Ltd (ACN 000 077 672), the Applicant shall purchase the whole of the property known as "Pylara", via Tarago. The request may be made at any time after this approval, despite any other conditions. The purchase, including acquisition price, shall be on the terms agreed between the Applicant and Pylara Pty Ltd. The acquisition price shall be fair and reasonable, shall take into account all relevant matters, and shall, at least, include payment for : a) a sum not less than the current market value of Pylara Pty Ltd's interest in i. Pylara at the date of this consent, having regard to: ii. the existing use and permissible use of the land in accordance with the applicable planning instruments at the date of the written request; and iii. the presence of improvements at Pylara and/or any Council approved		This Condition was previously assessed and, therefore, not triggered in this Audit Period. Veolia purchased Pylara property in 2001.	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>iv. building or structure which although substantially commenced at the date of request is completed subsequent to that date; and</p> <p>v. as if Pylara was unaffected by the Applicant's Development Proposal.</p> <p>b) reasonable compensation to Pylara Pty Ltd for disturbance allowance and relocation costs within the Mulwaree Shire, or within such other location as may be determined by the Director-General in exceptional circumstances; and</p> <p>c) Pylara Pty Ltd's reasonable costs for obtaining legal advice and expert witnesses for the purposes of establishing the acquisition price of Pylara and the terms upon which Pylara Pty Ltd is seeking for it to be acquired.</p>				
110	<p>In the event that the Applicant and Pylara Pty Ltd cannot agree within three months upon the acquisition price of Pylara and/or the terms upon which it is to be acquired under the terms of this consent, then:</p> <p>a) either party may refer the matter to the Director-General, who shall request the President of the Australian Property Institute to appoint a qualified independent valuer or Fellow of the Institute, who shall determine, <i>after consideration of any submissions from the owner's and the Applicant, a fair and reasonable</i> acquisition, price for Pylara as described in sub-clause (a) and/or terms upon which it is to be acquired;</p> <p>b) in the event of a dispute regarding outstanding matters that cannot be resolved, the independent valuer shall refer the matter to the Director-General, recommending the appointment of a qualified panel. The Director-General, if satisfied that there is a need for a qualified panel, shall arrange for the</p>		<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period. Veolia purchased Pylara property in 2001.</p>	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	constitution of the panel. The panel shall consist of: (i) the appointed independent valuer, (ii) the Director-General or nominee, and (iii) the president of the Law Society of NSW or nominee. c) The qualified panel shall advise the independent valuer on the outstanding matters that the independent valuer refers for its consideration, following which the independent valuer shall determine a fair and reasonable acquisition price as described in condition 109 and/or the terms upon which Pylara is to be acquired.				
111	The Applicant shall bear the costs of any valuation or survey assessment requested by the independent valuer, panel or the Director-General.		This Condition was previously assessed and, therefore, not triggered in this Audit Period. Veolia purchased Pylara property in 2001.	Not triggered	
112	The Applicant shall, within fourteen days of receipt of a determination by the independent valuer, offer in writing to Pylara Pty Ltd to acquire the relevant land at a price no less than the said acquisition price as determined, and upon any terms set out by the independent valuer.		This Condition was previously assessed and, therefore, not triggered in this Audit Period. Veolia purchased Pylara property in 2001.	Not triggered	
AIR QUALITY					
Odour					
Waste Management Facility Site					
113	There shall be no offensive odour emitted from the premises, in accordance with Section 129 of the Protection of the Environment Act 1997, nor emissions to the atmosphere from the landfill that may adversely affect the health or amenity of the community. (EPA GTA)		This Condition has been superseded by PA 10_0012, Conditions 4.6 (odour) and 4.11 (dust). Also refer to EPL 11436, Condition L6.1.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
114	A meteorological station shall be installed and operated on the landfill site in accordance with the following Australian Standards: a) AS 2922-1987 Ambient air – Guide for the siting of sampling units; and b) AS 2923-1987 Ambient air – Guide for measurement of horizontal wind for air quality applications. The meteorological station shall measure and electronically log wind speed, wind direction, ambient temperature, sigma theta (standard deviation of the horizontal wind direction fluctuation), solar radiation. All parameters must be logged at 15 minute intervals to provide 1-hour average values and the station must be able to provide instantaneous wind speed and direction to assist in investigation of complaints. The meteorological station shall also measure rainfall and evaporation. (EPA GTA)		This Condition has been superseded by PA 10_0012, Conditions 4.22. Also refer to EPL 11436, Condition M4.1.	Compliant	
<u>Intermodal Facility Site</u>					
115	There shall be no offensive odour emitted from the premises, in accordance with Section 129 of the Protection of the Environment Act 1997. (EPA GTA)		This Condition has been superseded by PA 10_0012, Condition 5.8. Also refer to EPL 11455, Condition L5.1.	Compliant	
<u>Dust</u>					
<u>Waste Management Facility Site</u>					
116	Activities occurring on the waste management facility site during the construction and operational phases must be carried out in a manner that will minimise emissions of dust from the premises. (EPA GTA)		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 11. Also refer to EPL 11436, Condition O3.1.	Compliant	
117	The Applicant must take all practical steps to manage dust emissions during the construction and operational phase of the waste management facility to minimise off-site		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 11. Also refer to EPL 11436, Condition O3.2.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	impacts of total suspended particulates, lead and dust deposition. (EPA GTA)				
118	The LEMP must detail a system to prevent and suppress all dust emissions to meet the requirements in conditions 116 and 117. (EPA GTA)	<ul style="list-style-type: none"> 2018 LEMP 	Dust management measures are addressed in the LEMP as being detailed in the AQGGMP.	Compliant	
119	Trucks which are entering and leaving the premises and carrying loads must be sealed or covered at all times, except during loading and unloading. (EPA GTA)		Refer to EPL 11436, Condition O3.3.	Compliant	
120	All internal permanent roadways between the container transfer area and Collector Road must be sealed. (EPA GTA)		Refer to EPL 11436, Condition O3.4.	Compliant	
121	All sealed surfaces intended to carry vehicular traffic must be managed to minimise the quantity of wind blown dust emissions. (EPA GTA)		Refer to EPL 11436, Condition O3.5.	Compliant	
122	All unsealed roads must be treated so that there are no visible dust emissions. Details of treatment measures must be documented in the LEMP.		Refer to EPL 11436, Condition O3.6. Dust management measures are addressed in the LEMP as being detailed in the AQGGMP.	Compliant	
123	A progressive rehabilitation strategy must be prepared and implemented for any unsealed areas of the site to prevent both wind blown dust emissions and contaminated stormwater runoff. This strategy must be documented in the LEMP. (EPA GTA)		The unsealed road rehabilitation strategy is documented in the LEMP as being addressed in the AQGGMP.	Compliant	
Intermodal Facility Site					
Construction and Operational Phases					
124	Activities occurring at the premises must be carried out in a manner that will minimise emissions of dust from the premises. (EPA GTA)		Refer to EPL 11455, Condition O3.1.	Compliant	
125	The Applicant shall prepare a dust management plan that outlines measures to prevent wind blown dust. The dust management plan must	<ul style="list-style-type: none"> 2016 IMF EMP 	A dust management plan is not available for the Crisps Creek IMF. A dust	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	be included as a component of the LEMP. The dust management plan must specify measures to prevent wind blown dust during the construction and operational phases.(EPA GTA)		<p>management plan was not required under Schedule 5 of PA 10_0012 for the Crisps Creek IMF. Dust emissions are required to be minimised under EPL 11455. The LEMP does not relate to the Crisps Creek IMF so it is not considered appropriate that a dust management plan for the Crisps Creek IMF be included in the LEMP. However, the LEMP does document that Condition 125 is addressed in accordance with Schedule 7, Condition 4 of PA 10_0012, which is the IMF EMP. Schedule 7, Condition 4(v) requires that the IMF EMP "identify all threats to the environment and public health that could arise from the operation of the Crisps Creek IMF, measures to minimise these risks and notify the relevant government agencies and community in the event of an emergency".</p> <p>The IMF EMP does identify potential environment impacts but dust is not identified as a potential environmental impact and therefore, dust control measures are not included. Based on observation during the site visit, the site is entirely paved (where the forklifts and trucks operate) or covered in hardstand or grass/vegetation, and the risk of dust emissions is considered very low.</p> <p>Based on the above findings, this Condition is considered compliant.</p>		

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			The Auditor recommends as an opportunity for improvement that the IMF EMP be revised to include wind-blown dust emissions as a hazard (particularly given EPL 11455, Condition O3.1) and document the management measures (maintaining paving, hardstand and vegetation cover).		
126	Trucks entering and leaving the premises that are carrying excavated dusty materials including clays, sands and soils must be covered at all times, except during loading and unloading. (EPA GTA)		Refer to EPL 11455, Condition O3.2.	Compliant	
127	All sealed and unsealed surfaces shall be managed to minimise the quantity of wind blown dust emissions. (EPA GTA)		Same finding and recommended opportunity for improvement as for Condition 125 above.	Compliant	
ENVIRONMENTAL MONITORING (EPA GTAs)					
Waste Management Facility Site					
<u>Odour Monitoring</u>					
128	The Applicant must prepare and implement an odour monitoring plan. The plan must be developed in consultation with the EPA and documented in the LEMP.	<ul style="list-style-type: none"> 2018 AQGGMP 	<p>This Condition has been superseded in part by PA 10_0012, Schedule 4, Condition 7, which requires annual independent odour audits, and involves quantitative odour monitoring.</p> <p>The LEMP indicates that the AQGGMP includes a program for monitoring air quality impacts including odour. The AQGGMP indicates that the monitoring is conducted annually at location "defined by independent odour auditor".</p> <p>Also refer to EPL 11436, Condition O3.1.</p>	Compliant	
<u>Ambient Air Quality Monitoring</u>					

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
129	The Applicant must prepare and implement an ambient air quality-monitoring plan. The ambient air quality-monitoring plan must be documented in the LEMP. The plan must address but may not necessarily be limited to the following: (a) Monitoring methodologies and standards; (b) Monitoring for concentrations of total suspended particulates (TSP), lead and dust deposition rates; (c) Locations where monitoring will be carried out; (d) Detailed monitoring cycle and the duration of each monitoring cycle; and (e) Reporting. Monitoring is to be carried out in accordance with Approved Methods for the Sampling and Analysis of Air Pollutants NSW December 1999, or other methods stipulated in the EPL.	<ul style="list-style-type: none"> 2018 AQGGMP 	This Condition has been superseded in part by PA 10_0012, Schedule 4, Condition 12, which is the AQGGMP and is documented in the LEMP. The AQGGMP meets the requirements of this Condition except that it does not include TSP or lead monitoring. Given that the AQGGMP was prepared in consultation with OEH and approved by DPIE, the Auditors assume that TSP and lead monitoring were no longer required. On this basis, this Condition is considered superseded.	Compliant	
Landfill Gas Monitoring					
130	The Applicant must prepare and implement a system of monitoring surface and subsurface landfill gas concentrations. Details of the surface and subsurface landfill gas monitoring system must be documented in the LEMP. At a minimum, landfill gas shall be monitored for methane, carbon dioxide, and oxygen. The EPL may require other substances to be monitored.	<ul style="list-style-type: none"> 2018 AQGGMP 	This Condition has been superseded by PA 10_0012, Schedule 4, Condition 12, which is the AQGGMP and is documented in the LEMP. The AQGGMP meets the requirements of this Condition. Also refer to EPL 11436, Conditions P1.1, M2.2	Compliant	
Groundwater Monitoring					
131	The Applicant shall prepare and implement a groundwater monitoring program that can detect groundwater flow and direction and any occurrence of groundwater pollution. The groundwater monitoring program must be documented in the LEMP.	<ul style="list-style-type: none"> 2018 SWMP 	This Condition has been superseded by PA 10_0012, Schedule 4, Condition 17, which is the SWMP and is documented in the LEMP. The SWMP generally meets the requirements of this Condition.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>The program must include details on:</p> <p>(a) location of bore holes around the perimeter of the mine void and ED3- including the depth at which they are screened to enable access of groundwater;</p> <p>(b) monitoring the height of the groundwater table;</p> <p>(c) monitoring the groundwater gradient and to determine the direction of groundwater flow;</p> <p>(d) monitoring methodologies and standards to be employed;</p> <p>(e) reporting and assessment of results;</p> <p>(f) opportunities to integrate the monitoring program with other monitoring programs in the vicinity;</p> <p>(g) the parameters and substances that are proposed to be monitored, including sampling and analysis frequencies; and</p> <p>(h) groundwater height should be reported against water table contours around the site to assess any variation over time.</p>		<p>The Auditors observe that whilst the SWMP includes monitoring of the standing water level (SWL) in the piezometers around the bioreactor void, the SWMP does not detail how the groundwater height should be reported against water table contours around the site and should be monitored and reported to assess any variation over time, and importantly, ensure that the groundwater continues to flow towards the void. There is also no connection made to the monitoring of the saturation level of the leachate in the Bioreactor void, which is addressed in the LMP.</p> <p>Also refer to EPL 11436, Conditions P1.3, M2.3.</p> <p>The Auditors recommend as an opportunity for improvement, that the SWMP be reviewed and revised to include monitoring and reporting the groundwater contours and flow direction, as well as the height of the saturation level in the Bioreactor void to verify that groundwater continues to flow towards the void.</p>		
Surface Water Monitoring					
132	<p>The Applicant shall prepare and implement a surface water-monitoring program to monitor the environmental performance of the construction, operation and rehabilitation of the development on surface water. The surface water-monitoring program must be documented in the LEMP.</p>	<ul style="list-style-type: none"> 2018 SWMP 	<p>This Condition has been superseded in part by PA 10_0012, Schedule 4, Condition 17, which is the SWMP and is documented in the LEMP. The SWMP generally meets the requirements of this Condition although not</p>	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>The program must include details on:</p> <p>(a) Monitoring locations including:</p> <p>(i) Crisps Creek ;</p> <p>(ii) Allianoyonyiga Creek;</p> <p>(iii) coffer dam(s)</p> <p>(iv) ED1;</p> <p>(v) ED3N;</p> <p>(vi) ED3S;</p> <p>(vii) ED3S-S;</p> <p>(viii) ED2;</p> <p>(ix) Downstream receiving waters of ED2;</p> <p>(x) All treated leachate effluent discharge lines;</p> <p>(xi) Discharge line from ED3S to ED2; and</p> <p>(xii) rainwater collected in the mine void;</p> <p>(b) monitoring methodologies and standards to be employed;</p> <p>(c) monitoring frequency based on rainfall events and creek flow assessment;</p> <p>(d) an assessment of the contribution of surface water pollution from the Woodlawn Waste Management Facility as distinct from the Woodlawn Mine site;</p> <p>(e) the quantity of water relocated from the mine void into ED3;</p> <p>(f) the quantity of water relocated from ED3 into the mine void;</p> <p>(g) the chemical composition of liquids added to the landfilled waste;</p> <p>(h) the chemical composition of treated leachate in the effluent discharge line and the coffer dam(s);</p> <p>(i) the chemical composition of leachate within ED3S-S;</p> <p>(j) the quantity of water that reports to ED3 , including its sources;</p> <p>(k) the quantity of water removed and/or discharged from ED3, including its</p>		<p>all of the requirements of this Condition have transferred across, particularly, monitoring of volumes that are transferred from one location to another (e.g. void to ED3, ED3 to void, ED3S to ED2). Currently, data is not readily available to demonstrate, for example, that no transfers have occurred between ED3S and ED2. If this data was being monitored and recorded, even if transfers are zero, it would provide a record.</p> <p>Also refer to EPL 11436, Conditions P1.3, M2.3.</p> <p>The Auditors recommend as an opportunity for improvement, that the SWMP be reviewed and revised to include all of the monitoring requirements from Condition 132, including those that have yet to be triggered.</p>		

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>destination;</p> <p>(l) the total quantity of water contained in ED3;</p> <p>m) the quantity of water transferred from ED3S into ED2;</p> <p>n) the quantity of water that reports to ED2 from Woodlawn Waste Management Facility, including its sources;</p> <p>o) the total quantity of water contained in ED2;</p> <p>(p) the total quantity of treated leachate contained in the coffer dam(s);</p> <p>(q) the total quantity of water contained in ED1;</p> <p>(r) the parameters and substances that are proposed to be monitored, including sampling and analysis frequencies;</p> <p>(s) reporting and assessment of results; and</p> <p>(t) opportunities to integrate the monitoring program with other monitoring programs in the vicinity.</p> <p>The Monitoring of ED2 will initially be at weekly intervals once the transfer of stormwater from ED3S to ED2 has commenced and will be reviewed 12 months after commencement of MOD 2.</p> <p>Conditions pertaining to ED2 will be triggered only in the event of transfer of water from ED3S to ED2.</p>				
Leachate Monitoring					
133	<p>The Applicant shall prepare and implement a leachate quality and quantity monitoring program. The program must be documented in the LEMP.</p> <p>The program must include details on:</p> <p>(a) monitoring locations;</p> <p>(b) monitoring methodologies and standards to be employed;</p>	<ul style="list-style-type: none"> 2018 LMP 	<p>This Condition has been superseded in part by PA 10_0012, Schedule 4, Condition 18, which is the LMP and is documented in the LEMP. The LMP generally meets the requirements of this Condition. The Auditors observe that in Section 5.1.1, it is stated that "the leachate level will also be</p>	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(c) monitoring frequency (d) the height of the saturation level in the waste; (e) the parameters and substances which are proposed to be monitored (eg redox potential, metals); and (f) reporting and assessment of results.		monitored at different locations in the Bioreactor to establish the standing level of leachate. These results are compared against groundwater levels to determine potential interaction between leachate and groundwater". However, the monitoring details (methodology, locations, frequency) and reporting of this important aspect of managing the Bioreactor and assessing the water balance, is not adequately described. It also needs to be cross-referenced with the groundwater monitoring program detailed in the SWMP.		
134	The Applicant shall notify the EPA as soon as practicable after becoming aware that the height of the saturation level in the waste is above the height of the groundwater table that surrounds the mine void.		Refer to EPL 11436, Conditions R3.5 and R3.6. The Auditors understand that this has not occurred and therefore, has not been triggered. However, the Auditors observe that this requirement is not addressed within the LEMP, the LMP or the SWMP. The LEMP indicates it is addressed in Section 1.4.1 of the SWMP. The SWMP indicates it is addressed in Section 4.4.3 of the LMP. The LMP indicates it is addressed in Section 4.4.3 of the LEMP. The Auditors recommend as an opportunity for improvement that this requirement, or more specifically EPL 11436, Conditions R3.5 and R3.6, be documented in the LEMP, SWMP and LMP. It should be included in all three management plans because it is	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			dependent on aspects of groundwater and leachate monitoring, and a key performance indicator for the Bioreactor.		
<u>Environmental Performance of the Bioreactor Landfill</u>					
135	<p>A Bioreactor Performance Monitoring Program (BPMP) must be developed and implemented which will:</p> <ul style="list-style-type: none"> (a) assess the efficiency of the decomposition of the landfilled waste; (b) assess the optimum leachate recirculation program; (c) assess the optimum water injection program; (d) assess the effect of the saturation depth of the leachate on bioreactor performance; and (e) assess the quantity of methane and carbon dioxide (and the relative proportions) that are emitted by the biological decomposition of the landfilled waste; <p>The BPMP must also include monitoring of the quantity of rainwater that passively infiltrates into the landfilled waste, the quantity and chemical composition of water that is deliberately added to the landfilled waste, and the quantity of leachate in the landfilled waste. The Bioreactor Performance Monitoring Program must be documented in the LEMP.</p>	<ul style="list-style-type: none"> • 2018 LEMP 	<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period.</p> <p>The LEMP documents the BPMP in Section 1.3.7.2.</p>	Not triggered	
<u>Noise Monitoring</u>					
136	<p>Noise levels must be monitored to confirm performance and to assess compliance with Condition 99, A noise-monitoring program must be developed and implemented. The noise-monitoring program must be submitted to the EPA for review. The program must be documented in the LEMP. The program must include details on:</p>	<ul style="list-style-type: none"> • 2018 LEMP • 2018 NMMP 	<p>This Condition has been superseded in part by PA 10_0012, Schedule 4, Condition 21, which is the NMMP and is documented in the LEMP.</p>	Compliant.	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(a) methodologies for noise monitoring; (b) location of noise monitoring; and (c) frequency of noise monitoring.				
<u>Geo-technical Stability</u>					
137	The geo-technical stability of the premises must be monitored in accordance with the recommendations of the report prepared by BFP Consultants P/L dated 17 December 1998, titled <i>Woodlawn Landfill – Geo-technical Study</i> . The monitoring program must be documented in the LEMP.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 	<p>This Condition was previously assessed and, therefore, not triggered in this Audit Period.</p> <p>The LEMP documents the Geotechnical Stability Monitoring Plan in Section 1.3.7.2.</p>	Not triggered	
<u>Reporting</u>					
138	The Applicant must provide an annual return to the EPA in relation to the development as required by any licence under the POEO Act 1997 in relation to the development. In the return, the Applicant must report on the annual monitoring undertaken (where the activity results in pollutant discharges), provide a summary of complaints relating to the development, report on compliance with licence conditions and provide a calculation of licence fees (administrative fees and, where relevant, load based fees) that are payable. If load based fees apply to the activity the Applicant will be required to submit load-based fee calculation work-sheets with the return.		Refer to EPL 11436, Conditions R1.	Compliant	
<u>Intermodal Facility Site</u>					
<u>Water Monitoring Program</u>					
139	A surface water-monitoring program must be developed and implemented. The program must include details on but need not necessarily be limited to the following: (a) monitoring locations including: (i) Crisps Creek ;		This Condition has been superseded by PA 10_0012, Condition 7.4, which is the IMF EMP.	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(ii) Mulwaree River; and (iii) the bypass from the first flush structure(s); (b) the monitoring methodologies and standards to be employed; (c) monitoring frequency based on rainfall event and creek flow assessment; (d) the quantity of water collected weekly in the first flush structure; (e) reporting and assessment of results; (f) the parameters and substances which are proposed to be monitored; and (g) opportunities to integrate the monitoring program with other monitoring programs in the vicinity. The monitoring program must be documented in the LEMP.				
Noise Monitoring					
140	Noise levels must be monitored to confirm performance and to assess compliance with Conditions 100 and 101. A noise-monitoring program must be developed and implemented. The program must include details on: (a) methodologies for noise monitoring; (b) location of noise monitoring; and (c) frequency of noise monitoring. The monitoring program must be documented in the LEMP.		This Condition has been superseded by PA 10_0012, Condition 7.4, which is the IMF EMP.	Not triggered	
ROADWORKS					
141	Prior to the commencement of construction, the Applicant shall undertake and submit to Council a detailed pavement analysis on the affected sections of Main Road 268 (Bungendore Road) and Collector Road. The Applicant shall fund any necessary rehabilitation work identified in the pavement analysis.		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	The Applicant shall fund and provide on Main Road 268 (Bungendore Road) a minimum bitumen sealed width of 9.0 metres, incorporating marked fog lines and Centre-line as well as any required bus stops.				
142	The Applicant shall fund and provide on Main Road 268 (Bungendore Road) a minimum bitumen sealed width of 9.0 metres, incorporating marked fog lines and centre-line as well as any required bus stops.		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
143	The intermodal facility access road shall be constructed in accordance with Auspec specifications and shall have a 7.0 metre wide sealed bitumen pavement for two Way roads and 5.0 metres on one way roads.		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
144	In accordance with the "Mulwaree Section 94 Contributions Plan", the Applicant shall provide a financial contribution to Council towards extraordinary road damage accept as may be waived by Council. The contribution is to be paid quarterly in arrears.		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
145	Prior to the commencement of landfilling operations, the Applicant shall fund and undertake to the satisfaction of Council and the Roads and Traffic Authority the following works: (a) rehabilitation of the pavement at the intersection of Bungendore and Collector Roads; (b) provision of a right turn bay at the intersection of Bungendore and Collector Roads for south-bound traffic turning into Collector Road; (c) construction of a right turn bay on Bungendore Road for right-turning traffic into the Intermodal Facility. (MSC GTA); and		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(d) paving of the following areas with an asphalt concrete overlay: (i) intersection of the Intermodal access road and Main Road 268 (ii) intersection of Main Road 268 and the Collector Road (iii) intersection of the Collector Road and the access road to the landfill site.				
146	The access point to the Intermodal Facility at Bungendore Road shall be constructed to a design and standard to the Roads and Traffic Authority (RTA) and Council specifications and shall have a minimum sight distance of 225 metres in both directions. (MSC GTA)		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
147	The access point to the Waste Management Facility site at Collector Road shall be constructed to accommodate B-doubles. (MSC GTA)		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
148	The Applicant shall liaise with Council in relation to upgrading the existing warning signposting at the junction of Bungendore and Collector Roads to better inform through traffic of the side road junction and turning trucks. (MSC GTA)		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
LANDSCAPING AND VEGETATION MANAGEMENT					
149	The Applicant shall prepare a Landscaping and Vegetation Management Plan for both the Waste Management Facility and Intermodal Facility sites. The Plan shall be prepared by a suitably qualified person and shall address, but not be limited to, the following matters: (a) details of likely vegetation loss, means to minimise such loss and additional tree planting to offset this loss; (b) proposed plant species; and		This Condition has been superseded by PA 10_0012, Conditions 4.23 (Landfill) and 7.4 (IMF).	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(c) details on landscaping treatment at the intermodal facility site, with particular attention to minimising the visibility of the facility from residences and public vantage points.				
150	The Plan shall be prepared to the satisfaction of the Director-General and Council and shall be submitted at least three months prior to the commencement of landfilling operations.		This Condition has been superseded by PA 10_0012, Conditions 4.23 (Landfill) and 7.4 (IMF).	Not triggered	
AGRICULTURAL RISKS					
151	The Applicant shall prepare to the satisfaction of NSW Agriculture a contingency plan for agricultural risks in the event of an incident such as an accident during the transportation of waste from Sydney.	<ul style="list-style-type: none"> 2018 LEMP 2020 ERP 	<p>This condition has been audited previously and is not relevant to the current Audit period.</p> <p>However, it is observed that the ERP includes a 'Pylara Farm Emergency Response Procedure for chemical/fuel spills at the farm. It does not address a spill of waste during transportation in an agricultural area, except if it involves a train derailment.</p> <p>With reference to the recommendation for Condition 32, the Auditors recommend as an opportunity for improvement that the ERP provide an Emergency Response Procedure for a truck rollover and spill of waste on a public road and include consideration of the risk to the surrounding agricultural area and necessary response and notification requirements.</p>	Not triggered	
152	As part of the LEMP, the Applicant shall prepare a plan to manage pests, diseases, vermin, and declared noxious weeds. The plan shall also address measures to manage bird pests in order to minimise the risk of any transfer of		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 24.	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	contaminants from the waste management facility site to regional waterways and water supply reservoirs. The plan shall also address the recommendations of the report prepared by Kinsella Consulting entitled " <i>Potential for Transport of Pests and Diseases of Plants and Animals from North Sydney to Tarago in Municipal Wastes</i> ", dated February 1999 and included as Appendix L of the EIS. (EPA GTA)				
FLORA AND FAUNA					
Terrestrial Flora and Fauna					
153	The Applicant shall consult with NPWS on measures to conserve the population of the vulnerable orchard (<i>Diuris aequalis</i> – Buttercup Doubletail) in retained natural woodland on land within the Woodlawn mine site that is subject to the DA or areas potentially affected by the operation of the waste management facility.	<ul style="list-style-type: none"> 2016 LVMP 	This Condition has been superseded by PA 10_0012, Conditions 4.23. The LVMP does not refer to Buttercup Doubletail but Section 4.1.7 states that "Veolia consult with National Parks and Wildlife Service (NPWS) where required in relation to threatened species identified". The Auditors recommend as an opportunity for improvement, that Veolia consider adding a section to the LVMP that provides information on the Buttercup Doubletail and any other threatened or vulnerable species known to be in the region. Consider including a picture and means of raising awareness with site personnel that this species may be present and if it is sighted to report it so that it may be conserved in accordance with this Condition.	Not triggered	
Aquatic Flora and Fauna					
154	The Applicant shall consult NSW Fisheries prior to the commencement of any works (including, but not limited to channel realignment, dredging, reclamation, culverts, road crossings, pipelines and weirs) in or adjacent to aquatic habitats.		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
155	The Applicant shall undertake all practicable measures to maintain and, where possible, enhance existing habitat features in the Mulwaree River and Crisps Creek, including gravel beds, riffles, pools, snags and aquatic and riparian vegetation.	<ul style="list-style-type: none"> 2018 LEMP 2016 IMF EMP 	<p>This condition has been audited previously and is not relevant to the current Audit period.</p> <p>The Auditor observe that both the LEMP and the IMF EMP address maintenance of riparian zones.</p>	Not triggered	
156	The Applicant shall, in consultation with NSW Fisheries, ensure that the bridge from the Intermodal Facility over Mulwaree River is designed so that fish passage, instream flow and stream bed continuity are maintained.		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
HERITAGE AND ARCHAEOLOGY					
Aboriginal Heritage					
	Note: The Applicant has been given Consent to Destroy for sites Crisps Creek 1 and 2, Tarago, NSW under section 90 of the National Parks and Wildlife Act 1974. Artefacts from Crisp Creeks sites 1, 2 and 4 have been salvaged, in accordance with the conditions of NPWS Permit #SCHU 0071.			Not triggered	
Non-Aboriginal Heritage					
157	In the event that any items potentially of non-Aboriginal heritage significance are identified on the subject land during the carrying out of works, the Applicant shall arrange for a suitably qualified archaeologist to inspect the item/s, determine the level of significance of the item/s and advise on appropriate management measures.			Not triggered	
CONTINGENCY PLANNING					
Emergency Management Plan					

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
158	In relation to activities, which in the event of a disruption to operations may result in significant pollution being emitted, the Applicant must: (a) conduct an assessment to determine the potential internal and external causes of disruption of operations at the premises; (b) determine how these disruptions would impact on operations; and (c) identify the pollution that would result due to the disruption of operations and what impact the pollution would have on the health of the community and the environment.		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 25 and has been audited previously.	Not triggered	
159	In relation to matters identified in Condition 158, as part of the LEMP, the Applicant must prepare an Emergency Management Plan. The Plan shall address, but not necessarily be limited to: (a) identification of threats to the environment and/or public health that could arise in relation to the construction and operation of Waste Management Facility and Intermodal Facility including the transportation of waste. These threats may include fire (waste transportation or within the landfill), overflow, dam failure, power or other utility failure, natural disaster etc; (b) identification of strategies to minimise and ameliorate the effects of any groundwater surface water pollution identified from the groundwater and surface water monitoring programs; (c) an estimate of the cost of implementation; (d) actions to effectively respond to the disruption of operations so the risk of pollution is minimised;	<ul style="list-style-type: none"> 2020 ERP 	This Condition has been superseded by PA 10_0012, Schedule 4, Condition 25.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>(e) a communications strategy for alerting relevant agencies and the potentially affected community in the event of the disruption to operations leading to significant pollution;</p> <p>(f) ensuring that all relevant employees are familiar with the emergency management plan; and</p> <p>(g) any chemical storage required to operate the LTP and be consistent with the DPE's HIPAP No.1, 'Emergency Planning'.</p> <p>The Applicant should regularly review the adequacy of the plan obtaining expert advice as required.</p> <p><i>Note: When developing this emergency plan opportunities may exist to integrate with the Woodlawn Min site emergency management plans.</i></p>				
159A	<p>Prior to operation of the LTP, or within such further period as the Secretary may agree, the Applicant shall prepare and submit a revised Emergency Management Plan to the Secretary for approval. The plan shall include the site changes in MOD 2 and MOD3, in accordance with the requirements of Condition 159.</p>	<ul style="list-style-type: none"> 2020 ERP 	<p>This Condition has been superseded by PA 10_0012, Schedule 4, Condition 25.</p>	Compliant	
159B	<p>A comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. Records from the Safety Management System must be kept on-site and must be available for inspection by the Secretary upon request. The Safety Management System shall be consistent with the Department of Planning and Environment's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'.</p>		<p>This Condition has been superseded by PA 10_0012, Schedule 4, Condition 25A.</p>	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
159C	<p>The Applicant must store all chemicals in accordance with:</p> <p>(a) the 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 liquids.</p> <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>		This Condition has been superseded by PA 10_0012, Schedule 4, Condition 25B.	Compliant	
COMPLAINTS PROCEDURES					
160	<p>Prior to the commencement of construction, the Applicant shall establish a free-call telephone line that operates 24 hours per day 7 days per week on which complaints about the subject development can be registered. The Applicants shall record details of all complaints received and actions taken in response to complaints in an up-to-date log book. The Applicants shall ensure that an initial response to complainants is provided within 24 hours and detailed response within 10 days of the complaint being lodged. The system must also be provided with a complaint verification procedure which correlates potential sources of odours with an operation or activity by assessing relevant meteorological data.</p>	<ul style="list-style-type: none"> 2018 LEMP 2016 IMF EMP WL – Eco-Precinct Odour Complaint Response, PRO-13168, 20/04/2020 Odour Complaint Reports 	<p>Refer to EPL 11436, Conditions M5 and M6</p> <p>Refer to EPL 11455, Conditions M4 and M5</p> <p>The Auditors observe that the LEMP and IMF EMP document how complaints are handled. However, they do not refer to a complaint verification procedure that aims to correlate potential sources of odours with an operation or activity by assessing relevant meteorological data.</p> <p>The Eco-Precinct Odour Complaint Response procedure provides further detail including an action to "Note if possible the weather conditions on the day of the event".</p> <p>The Auditors understand that when Veolia investigate odour complaints, they utilise and record the meteorological data in the odour complaint report.</p>	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			The Auditors recommend as an opportunity for improvement, that the LEMP, IMF EMP and the Odour Complaint Response procedure be reviewed and revised to more clearly state that a complaint verification procedure using meteorological data is required and implemented.		
161	The complaints register shall be available for inspection upon request by the Director-General, EPA, DLWC, and the CLC.		Refer to EPL 11436, Conditions M5, M6, R4.2 Refer to EPL 11455, Conditions M4 and M5		
162	<p>Within 2 months of the date of the approval of MOD 2, a complaints handling procedure must be submitted to the Secretary for approval. The procedure shall be prepared in consultation with the Department, Goulburn-Mulwaree Council, the EPA and the Community Liaison Committee. The complaints handling procedure must include:</p> <ul style="list-style-type: none"> • a formal complaint/incident reporting procedure;; • an investigation procedure; and • a complaint resolution procedure. <p>A report of the complaint and the response/action taken and timeframe required to resolve the complaint must be made publicly available on the Applicants website within 7 days of a complaint being made. <i>Note: The level of detail contained in the report of the complaint shall be determined in consultation with the Department, Goulburn- Mulwaree Council, the EPA and the Community Liaison Committee.</i></p>		<p>This Condition has been superseded by PA 10_0012, Condition 7.7.</p> <p>This condition has been audited previously and is not relevant to the current Audit period.</p>	Not triggered	
163	The Applicant shall provide a report the Secretary of the complaints received, the		This Condition has been superseded by PA 10_0012, Condition 7.7A.	Compliant	

Table A-2: Compliance with Conditions of Development Consent 31-02-99					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	response/action taken and timeframe in accordance with Condition 162, on an annual basis which is to be submitted within the AEMR. The report shall include all the matters required within subsections of Condition 162.				
164	From the commencement of MOD 2, the Applicant shall make the following information publicly available on its website as is required by the consent: a) a copy of all current statutory approvals; b) a copy of the Environmental Management Plan required under this approval; c) a copy of any AEMR including monitoring results (over the last 5 years); d) a copy of any Independent Environmental and Odour Audit, and the Applicant's response to the recommendations in any audit; e) report of the complaints and the response/action taken to resolve the complaint as required by Condition 162; f) a copy of the minutes of the Community Liaison Committee Meetings; and g) any other matter required by the Director-General.		This Condition has been superseded by PA 10_0012, Condition 7.10.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
1 Administrative Conditions					
A1 What the licence authorises and regulates					
A1.1	This licence authorises the carrying out of the scheduled activity listed below at the premises listed in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. 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.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	<p>The only scheduled activity that is carried out by the licensee is waste disposal by application to land in accordance with conditions of this licence.</p> <p>It should be noted that scale of activity is not limited by this condition.</p>	Compliant	
A2 Premises or plant to which this licence applies					
A2.1	The licence applies to the following premises: <i>Refer to table in EPL</i>			Noted	
A3 Other Activities					
A3.1	This licence applies to all other activities carried on at the premises, including: Ancillary Activity: Electricity Generating Works			Noted	
A4 Information supplied to the EPA					
A4.1	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. In this condition the reference to "the licence application" includes a reference to: 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	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia has advised all works and activities are being carried out in accordance with this condition.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.				
A4.2	The Woodlawn Bioreactor Landfill Environmental Management Plan 2016 prepared by Veolia Environmental Services (Australia) Pty Ltd and including any future amendments, is not to be taken as part of the documentation in A4.1, other than those parts specifically referenced in this licence.			Noted	
2 Discharges to Air and Water and Applications to Land					
P1 Location of monitoring/discharge points and areas					
P1.1	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point. <i>Refer to EPL for table</i>	<ul style="list-style-type: none"> • 2018 LEMP • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11436 Annual Return • 2019 EPL 11436 Annual Return • 2020 EPL 11436 Annual Return • Site visit on 17/03/2021 	<p>Monitoring locations are documented in the Landfill Environmental Management Plan (LEMP). Monitoring results are presented in the Annual Returns, AEPRs and AEMRs.</p> <p>A selection of locations was viewed by the Auditors onsite. The Auditors did not verify the location of all monitoring points against the location descriptions given in the table; however, the Auditors have no reason to believe the locations are not being used.</p>	Compliant	
P1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.		Not applicable – no table in this condition	Not triggered	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. <i>Refer to EPL for table (EPL modified since last IEA)</i>	<ul style="list-style-type: none"> • 2018 LEMP • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11436 Annual Return • 2019 EPL 11436 Annual Return • 2020 EPL 11436 Annual Return • Site visit on 17/03/2021 	<p>Monitoring locations are documented in the LEMP. Monitoring results are presented in the Annual Returns, AEPRs and AEMRs.</p> <p>A selection of locations were viewed by the Auditors onsite. The Auditors did not verify the location of all monitoring points against the original drawings given as location descriptions in the table; however, the Auditors have no reason to believe the locations are not being used.</p>	Compliant	
2 Limit Conditions					
L1 Pollution of waters					
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	<ul style="list-style-type: none"> • Interview with Veolia personnel, 17/03/2021 • 2018 LEMP • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11436 Annual Return • 2019 EPL 11436 Annual Return 	<p>The Bioreactor is deemed by Veolia as a zero-discharge site, as all surface and stormwater that comes into contact with waste or leachate is captured, stored and treated onsite. Non contaminated water is managed through diversion drains and bunds. Monitoring of surface and groundwater is documented and conducted in accordance with the LEMP. Monitoring results are reported in the Annual Return, AEPRs and AEMRs.</p> <p>Documentation provided confirms compliance with the condition.</p>	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> 2020 EPL 11436 Annual Return 			
L1.2	There must be no pollution of surface water or groundwater.	<ul style="list-style-type: none"> 2018 LEMP 2018 AEPR 2019 AEPR 2020 AEPR 2018 AEMR 2019 AEMR 2020 AEMR 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 2020 EPL 11436 Annual Return 	<p>Monitoring of surface and groundwater is conducted in accordance with the LEMP. Monitoring results are reported in the Annual Returns, AEMRs and AEPRs.</p> <p>The Auditors have no reason to believe this condition is not being met.</p>	Compliant	
L1.3	There must be no discharge of waters from the premises unless more than 210 mm of rain falls within a 72 hour time period (1 in 100 year ARI of 72 hours duration).	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia advised that there has been no discharge from the site during the Audit period.	Compliant	
L2 Concentration limits					
L2.1	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.		<p>Not applicable – no table in this condition.</p> <p>No water pollutants are relevant to this condition.</p>	Not triggered	
L2.2	Air Concentration Limits <i>Refer to EPL for table</i>	<ul style="list-style-type: none"> Ektimo Pty Ltd, Emission Testing Report, Report Numbers R006204, R008159 and 	Results of annual monitoring of gas engine emissions by a NATA accredited laboratory shows compliance with concentration limits.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		R009352, 08/10/18, 30/09/19 and 30/09/20, respectively			
L2.3	This condition does not authorise the pollution of air by any pollutant other than those specified in the above tables.			Noted	
L2.4	The reference bases for the air pollutants specified in condition L2.4 for Point 8 are as follows: a) For Nitrogen oxides (NO ₂ and/or NO): dry, 273 K, 101.3 kPa, 7% O ₂ . b) For Sulphuric acid mist (H ₂ SO ₄) and/or sulphur trioxide (SO ₃): dry, 273 K, 101.3 kPa.			Noted	
L3 Waste					
L3.1	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. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence. <i>Refer to EPL for table</i>	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	<p>All waste received at the Bioreactor during this reporting period was in accordance with the waste types permitted in the EPL. Waste generated onsite was deposited in the Bioreactor.</p> <p>This condition does not limit the amount of the types of waste that can be received however the amount of waste received at the landfill is limited by the input rates noted in condition L3.3.</p>	Compliant	
L3.2	The licensee may cause, permit or allow waste that is generated at the premises solely from activities relating the administration and			Noted	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	operation of the Woodlawn Solid Waste Landfill to be disposed of at the premises provided the waste type is listed in the above table.				
L3.3	The licensee must not exceed the maximum annual landfill input rates outlined in the table below. <i>Refer to EPL for table</i>	<ul style="list-style-type: none"> Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 DPIE letter re. Woodlawn Waste Management Facility (SSD 10_0012), Request for Extension to Receive Bushfire Waste 15/10/2020 Government Gazette Number 114 dated 02/11/18 and corresponding letter issued by the NSW EPA to Veolia 	<p>Refer to PA 10_0012, Schedule 3, Condition 5. Weighbridge records reviewed for period 2018 – 2020 confirm input rates at the Bioreactor. Input rates were in accordance with the conditions of the consent with the exception of the following:</p> <ul style="list-style-type: none"> Residual waste from AWT during 2019 and 2020 exceeded the input limit of 100,000 tonnes. Regional waste during 2019 and 2020 exceeded the input limit of 90,000 tonnes. <p>The Auditors observe that the EPL limit for putrescible regional waste remains at 90,000 tonnes but that the Department approved an increase in the PA 10_0012, Schedule 3, Condition 5 limit from 90,000 tpa to 125,000 tpa on 04/07/2019 subject to further consultation with the Goulburn Mulwaree Council. Hence, there is potential inconsistency between the two limits.</p>	Refer to PA 10_0012, 3.5	Refer to NC1
L3.4	The licensee is permitted to dispose of waste containing immobilised contaminants if that waste has been classified as General Solid Waste (non-putrescible) in accordance with an immobilised contaminants approval issued by the EPA.			Noted	
L4 Noise Limits					

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
L4.1	Noise from the premises must not exceed 35 dB(A) LAeq (15 minute) at the most affected residential receiver.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Woodlawn Bioreactor Complaints Register 	The original 2004 Noise Management Protocol included a monitoring protocol. Under the 2016 Noise Monitoring and Management Plan, monitoring is undertaken in response to a complaint; or to issue noise level checks on any new (untested) items. No noise complaints have been received at the Facility. The Auditors have no reason to believe the condition is not being met.	Compliant	
L4.2	<p>For the purpose of Condition L4.1:</p> <p>a) The LAeq noise level must be measured or computed at the most affected residential receiver over a period of 15 minutes using "FAST" response on the sound level meter.</p> <p>b) 5dB(A) must be added to the measured level if the noise is substantially tonal or impulsive in character.</p> <p>c) Measurement locations are:</p> <p>i) for night time (10 pm to 7 am) assessment - 1 metre from the façade of the residence; and</p> <p>ii) for day time (7 am to 10 pm) assessment – at the residential boundary or 30 metres from the residence where the boundary is more than 30 metres from the residence.</p> <p>d) The noise emission limits apply for prevailing meteorological and winds up to 3 metres per second, except under conditions of temperature inversions.</p>	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Woodlawn Bioreactor Complaints Register 2018 LEMP 	The LEMP states that the noise modelling for the EA predicted that standard activities at the bioreactor would not exceed these criteria at the nearest sensitive receivers. The LEMP requires noise monitoring to be conducted if noise complaints are received. No complaints have been received and, as such, monitoring has not been conducted. The Auditors have no reason to believe the condition has not been met.	Noted	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
L4.3	Where noise impacts are enhanced by temperature inversions, the licensee must identify any patterns of temperature inversions and the increased level of impacts, and develop and implement actions to quantify and ameliorate any enhanced impacts.			Not triggered	
L5 Hours of Operation					
L5.1	All operational activities at the premises may only be conducted between 6:00 am to 10:00 pm on Mondays to Saturdays. There must be no activities on Sundays, Good Friday or Christmas Day.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia advised that operations are generally restricted to 6:00am to 5:00pm.	Compliant	
L5.2	Construction work carried out at the premises must only occur between 7:00am and 6:00pm on Mondays to Fridays and between 7am and 1pm on Saturdays. Construction work must not be conducted on Sundays or Public Holidays.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Woodlawn Bioreactor Complaints Register 	During this audit period, construction work associated with the LTP were undertaken in 2018. Veolia have advised work was carried out in accordance with the condition. No complaints were received during this period regarding construction work.	Compliant	
L5.3	The times specified in condition L5.1 and L5.2 may be varied with the written consent of the EPA if the EPA is satisfied that the amenity of the residents in the locality will not be adversely affected.			Not triggered	
L6 Potentially Offensive Odour					
L6.1	There must be no offensive odour emitted from the premises, in accordance with Section 129 of the Protection of the Environment Operations Act 1997, nor emissions to the atmosphere from the landfill that may adversely affect the health or amenity of the community.	<ul style="list-style-type: none"> 2019 IOA 2020 IOA Site visit on 17/03/2021 Woodlawn Bioreactor Complaints Register 2018 AEPR 2019 AEPR 2020 AEPR 	The Auditors did not note the presence of offensive odour either within Tarago village, at the IMF or at the entry to the Woodlawn site. The Auditors acknowledge that conditions may have been favourable on the day of the site visit.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> 2018 AEMR 2019 AEMR 2020 AEMR Interview with Veolia personnel, 17/03/2021 	All complaints received at the site relate to odour. The 2019 IOA noted there was an increase in odour complaints compared with previous IOAs. It was noted that the increase was unclear given the significant improvements undertaken at the site. Continued active engagement with the community through existing odour complaints and response management strategy was recommended and is being implemented by Veolia.		
L6.2	No condition of this licence identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997.			Noted	
4 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.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 A selection of operator training records and internal management policies 	Operations at the site are conducted in accordance with the IMF EMP and Veolia's ISO 9001 quality and ISO 14001 environmental management system. A selection of Veolia's internal policies and their maintenance schedule and the training and competency records for operators were viewed as part of the audit.	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:	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia's maintenance schedule and the training and competency records for operators had been viewed. Veolia also participates in the National Heavy Vehicle	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	<ul style="list-style-type: none"> A selection of operator training records 	Accreditation Scheme. Maintenance and operational performance is audited under the scheme.		
O3 Dust					
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust at the boundary of the premises.	<ul style="list-style-type: none"> Site visit on 17/03/2021 2018 AEPR 2019 AEPR 2020 AEPR 2018 AEMR 2019 AEMR 2020 AEMR 	<p>The Auditors did not observe dust being emitted from the bioreactor site during the site visit. It should be noted that the visit was taken during a period of rain.</p> <p>Depositional dust sampling equipment is located on site. Samples are undertaken monthly and reported in the annual AEMR and AEPRs which have shown reasonably consistent results.</p> <p>The Auditors have no reason to believe this condition is not being met.</p>	Compliant	
O3.2	All operations and activities occurring at the premises must be carried out in a manner that will minimise off-site impacts of total suspended particulates, lead and dust deposition.	<ul style="list-style-type: none"> Site visit on 17/03/2021 2018 AEPR 2019 AEPR 2020 AEPR 2018 AEMR 2019 AEMR 2020 AEMR Woodlawn Bioreactor Complaints Register 	<p>The Auditors did not observe dust being generated at the bioreactor site during the site visit. It should be noted that the site visit was taken during a period of rainfall. Veolia have advised water trucks are used for dust suppression as required.</p> <p>Dust deposition monitoring is completed on a monthly basis. At three location: DG22, DG34 and DG28. Overall, it has been considered that dust suppression is generally consistent with previous years</p>	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			and measures for the dust control are in place. No complaints have been received in the audit period regarding dust.		
O3.3	Trucks which are entering and leaving the premises and carrying loads must be sealed or covered at all times, except during loading and unloading.	<ul style="list-style-type: none"> Site visit on 17/03/2021 Interview with Veolia personnel, 17/03/2021 	All waste received at the site by rail from Sydney is containerised. No uncovered road deliveries were observed during the site visit. All trucks observed during the site visit were observed enclosed.	Compliant	
O3.4	All internal roadways between the container transfer area and Collector Road must be sealed, except roadways within the mine void.	<ul style="list-style-type: none"> Site visit on 17/03/2021 	The access road from the site entry to the mine void is sealed.	Compliant	
O3.5	All surfaces intended to carry vehicular traffic must be managed to minimise the quantity of wind blown dust emissions.	<ul style="list-style-type: none"> Site visit on 17/03/2021 Interview with Veolia personnel, 17/03/2021 	Veolia has advised a water cart operates on all unsealed roads at the site. The Auditors have no reason to believe this condition has not been met.	Complaint	
O3.6	All unsealed roads must be treated so that there are no visible dust emissions.	<ul style="list-style-type: none"> Site visit on 17/03/2021 Interview with Veolia personnel, 17/03/2021. 	Veolia has advised a water cart operates on all unsealed roads at the site. The Auditors have no reason to believe this condition has not been met.	Complaint	
O4 Emergency Response					
O4.1	The licensee must have in place and implement procedures to minimise the risk of fire at the premises.	<ul style="list-style-type: none"> 2020 ERP Interview with Veolia personnel, 17/03/2021 	Documentation provided detailed the implementation of emergency response procedures at the site. The Auditors have no reason to believe this condition is not being met.	Compliant	
O4.2	The licensee must extinguish fires at the premises as soon as possible.	<ul style="list-style-type: none"> 2020 ERP Site visit on 17/03/2021 	Fire emergency procedures and training are detailed in the Emergency Response Plan. Equipment was observed by the Auditors.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
O4.3	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.	<ul style="list-style-type: none"> 2020 ERP Site visit on 17/03/2021 	<p>Fire emergency procedures and training are detailed in the Emergency Response Plan.</p> <p>The plan was observed at the site during the site visit.</p>	Compliant	
O5 Processes and management					
O5.1	Water from the West Ridge Catchment, as shown on Figure GO25/6/02 contained in the Surface Water Management Scheme in Section 8.6 of the Landfill Environmental Management Plan dated August 2004, must not drain into the landfill void.	<ul style="list-style-type: none"> 2018 LEMP 	As detailed in the previous audit, the LEMP has been updated and notes that the rehabilitated Western Ridge area drains back to clean catchment rather than ED3 or the bioreactor.	Compliant	
O5.2	Stormwater in the landfill void must only be discharged into Evaporation Dam 3, or used for operational purposes within the landfill such as bioreactor water and dust suppression as approved in writing by the EPA.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 	<p>Documented in the Soil and Water Management Plan with the LEMP, detailed procedures in accordance with the condition are provided.</p> <p>Veolia has advised stormwater is only discharged into Evaporation Dam 3.</p>	Compliant	
O5.3	Where contaminated water is used for dust suppression, it must only be applied in the landfill void, and in any areas around the	<ul style="list-style-type: none"> 2018 LEMP 	Documented in the Soil and Water Management Plan with the LEMP, detailed	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	perimeter of the void where contaminated water will drain back into the landfill void.		procedures in accordance with the condition are provided. The Auditors have no reason to believe this condition is not being met.		
O5.4	The evaporation of water by spraying must not result in the drifting of the sprayed liquid from the premises.	<ul style="list-style-type: none"> 2018 LEMP Site visit on 17/03/2021 	<p>The LEMP describes how evaporation of water by spraying is to be undertaken with reference to wind conditions.</p> <p>The Auditors did not observe evidence of spray drifting from the site.</p>	Compliant	
O5.5	Untreated leachate must not be transferred to Evaporation Dam 3 unless approved in writing by the EPA.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia have advised no untreated leachate is transferred into Evaporation Dam 3.	Compliant	
O5.6	Containers used for transporting waste must only be washed at the container wash facility as frequently as is necessary to minimise environmental impacts from the containers. The container wash down facility must be designed, installed and operated with the aim of collecting, treating and disposing of any wash down waters to the leachate collection system. Any collected solids must be returned to the active tipping face.	<ul style="list-style-type: none"> Site visit on 17/03/2021 Interview with Veolia personnel, 17/03/2021 	<p>Veolia advised that containers are washed down at the facility only when needed, e.g. for maintenance.</p> <p>No wash down was observed during the site visit.</p>	Compliant	
O6 Waste Management					
O6.1	The last licensee must prepare and submit to the EPA within six months prior to the last load of waste being landfilled a closure plan in accordance with section 76 of the Protection of the Environment Operations Act 1997.			Not triggered	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
O6.2	The landfill void must be managed to ensure the groundwater gradient directs groundwater flows towards the landfill void.	<ul style="list-style-type: none"> • 2018 LEMP • Interview with Veolia personnel, 17/03/2021 	According to the Soil and Water Management Plan as appendix to the LEMP, modelling of groundwater flows in 2016 showed a cone of depression evident around the bioreactor and this is expected to continue at least until the waste level approaches the natural water table. The Auditors have no reason to believe this condition has not been met.	Compliant	
O6.3	<p>A leachate collection/ storage/ recirculation/ treatment system must be designed, installed and operated to:</p> <p>a) accept, in addition to leachate, other waste-waters and contaminated storm-waters allowed by this licence to be introduced into the waste;</p> <p>b) efficiently operate, despite settlement of the waste;</p> <p>c) ensure that liquid is not deliberately stored in the landfilled waste, unless it is necessary for the efficient decomposition of the landfilled waste;</p> <p>d) ensure that leachate can be recirculated within the biologically active zones of the landfilled waste;</p> <p>e) comply with condition O5.2; and</p> <p>f) ensure to the maximum extent practicable the biological decomposition of all organic waste and productive capture of methane.</p>	<ul style="list-style-type: none"> • 2018 LEMP • 2019 LWMS Audit • 2020 LWMS Audit 	<p>Documented in the LEMP, detailed procedures in accordance with the condition are provided. The Auditors have no reason to believe this condition is not being met.</p> <p>Based on consultation with the EPA, it is understood that the EPA is concerned that leachate may be building up in the Bioreactor void due to the lower than expected throughput rates from the LTP. The Auditors do not have sufficient information to assess whether this is the case. However, we have no reason to believe that the liquid is being deliberately stored in the landfilled waste, except possibly due to the necessity to protect the membrane bioreactor treatment system in the LTP. Also Refer to PA 10_0012, Schedule 4, Condition 18R.</p>	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
O6.4	All dams used for the storage of treated leachate must be maintained with a minimum freeboard of 0.5m.	<ul style="list-style-type: none"> • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11436 Annual Return • 2019 EPL 11436 Annual Return • 2020 EPL 11436 Annual Return 	Monthly measurement reported in the AEMRs, AEPRs and Annual Return document the minimum freeboard has been maintained.	Compliant	
O6.5	<p>A barrier system must be installed for localised joints, fractures and rock debris within the landfill, in accordance with the specifications detailed in the letter from Coffey Geotechnics Pty Ltd to the Department of Planning, dated 6 September 2007, reference GEOTLCOV23353AA-AB (DECC reference DOC07/38671).</p> <p>Note: The licensee may propose an alternative barrier system for the different surfaces of the mine void that are required to be lined in accordance with condition O6.4. In order for the EPA to consider varying condition O6.4, the licensee must provide documented evidence that the proposed alternative barrier system is of at least equivalent performance to the barrier system specified in condition O6.4.</p>	<ul style="list-style-type: none"> • 2018 LEMP • 2018 LMP • Site visit on 17/03/2021 	<p>The leachate barrier systems are described in the Leachate Management Plan approved by the DPIE. Where joint fractures and drill holes require sealing, the 2004 Barrier System and Quality Assurance Plan (BSQAP) is referred to.</p> <p>The Auditors note that the LEMP refers to a series of other documents in relation to the barrier system.</p> <p>The Auditors observed a section of the void where the barrier system has been installed during the site visit.</p>	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
O6.6	The licensee must install the barrier system referred to in O6.4 in accordance with the Construction Quality Assurance plan in Part 10 of the Barrier System and Quality Assurance Plan in Section 8.1 of the Landfill Environmental Management Plan, dated August 2004.		This condition refers to the original construction of the bioreactor. This has been audited previously and is not relevant to the current Audit period.	Not triggered	
O6.7	The licensee must not import water or other liquids into the landfill void, unless otherwise approved by the EPA, except for first flush waters collected at the Crisps Creek Intermodal Facility site (Environment Protection Licence No. 11455), container washdown waters, raw dam water, and sludge from the leachate treatment plant. The licensee may also import leachate and washdown water generated at the Clyde Intermodal Facility (Environment Protection Licence No. 11763) and Banksmeadow Transfer Terminal (Environment Protection Licence No. 20581) from the compaction and loading of waste into rail containers that are subsequently transported to the Woodlawn Landfill. The leachate and washdown water generated at the Clyde Intermodal Facility and Banksmeadow Intermodal Facility must be able to be classified as Liquid Waste.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 	Veolia has advised no water is imported to the bioreactor without prior approval of the EPA. This requirement is documented in the Soil and Water Management Plan (SWMP) which has been approved by the DPIE.	Compliant	
O6.8	Cover material must be virgin excavated natural material, unless otherwise approved in writing by the EPA.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 	Veolia has documented that material was sourced from the surrounding areas including from Canberra Concrete Recyclers, Denrith and Common Street	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	Note: The licensee is encouraged to identify alternative daily cover materials and examine the feasibility of adopting such materials so as to minimise impacts of utilising virgin excavated natural material.	<ul style="list-style-type: none"> Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	Recycling for use as daily cover. Additional material was stockpiled onsite. The Auditors reviewed weighbridge records of the material transferred to the site. The Auditors have no reason to believe the condition is not being met.		
O6.9	Cover material must be of a quality that will not inhibit the biological decomposition of the landfilled waste.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 	Veolia has documented that VENM from documented sources will not inhibit the biological decomposition processes. The Auditors have no reason to believe the condition is not being met.	Compliant	
O6.10	Cover material must be applied to a minimum depth of 15 centimetres over all exposed landfilled waste prior to ceasing operations at the end of each day, unless otherwise approved in writing by the EPA. Note: This condition does not exclude removal of daily cover at the beginning of each day to provide for the efficient operation of the bioreactor and to avoid perching of leachate within the landfilled waste mass.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 	The requirements are documented in Section 3.3.1.1 of the LEMP and are understood by facility personnel; however, the Auditors did not verify cover thickness. The Auditors have no reason to believe the condition is not being met.	Compliant	
O6.11	Cover material must be applied to a depth of 30 centimetres over surfaces of the landfilled waste which have had 15 centimetres of cover material for more than 90 days, unless otherwise approved in writing by the EPA. Note: This condition does not exclude removal of cover prior to recommencement of active landfilling to provide for the efficient operation of the bioreactor and to avoid perching of leachate within the landfilled waste mass.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 	Cover material requirements are documented in Section 3.3.1.1 of the LEMP and Section 3.3 of the Soil and Water Management Plan (SWMP) and are understood by facility personnel. However, the specific 90 day requirement is not mentioned. The Auditors did not verify cover thickness. The Auditors have no reason to believe the condition is not being met. The Auditors recommend as	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			an opportunity for improvement that the LEMP address this requirement.		
06.12	At least two weeks supply of cover material must be available at the premises under all weather conditions, unless otherwise approved in writing by the EPA.	<ul style="list-style-type: none"> 2018 LEMP Interview with Veolia personnel, 17/03/2021 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	This requirement is documented in Section 3.3.1.1 of the LEMP and Section 3.3 of the Soil and Water Management Plan (SWMP). Veolia advised stockpiles of VENM are stored onsite as cover material when material is unable to be sourced from offsite. The Auditors have no reason to believe the condition is not being met.	Compliant	
06.13	The licensee must have in place and implement procedures to identify and prevent the disposal of any waste not permitted by this licence to be disposed of at the premises.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	The site is not open to the general public, with material only received from material transported from Veolia's Sydney facilities, and from regional clients. The specifications for permitted waste are included in the contracts with all clients. All clients are advised of the requirements in the event that unauthorised waste is received.	Compliant	
06.14	Final capping must comprise five layers in the order of installation: a seal bearing surface, a gas drainage layer, a sealing layer, an infiltration layer and the revegetation layer as specified in the Post Closure Landfill Rehabilitation Management Plan in Section 8.9 of the Landfill Environmental Management Plan dated August 2004			Not triggered	
06.15	The licensee shall ensure that as much landfill gas as is practicable is collected and treated	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	It has been reported by Veolia that 7 generators have been installed and commissioned, with 2 auxiliary flares as	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	by flaring or beneficially used in the landfill gas fired power station.	<ul style="list-style-type: none"> LandTeam letter to Goulburn Mulwaree Council, Re: Proposed increase in electricity generating capacity at Lot 2 in DP 1179305 - Woodlawn Bioreactor Power Station site. 609 Collector Rd, Tarago, 30/06/2020. 2018 AEPR 2019 AEPR 2020 AEPR 2018 AEMR 2019 AEMR 2020 AEMR 	<p>back up treatment of landfill gas emissions captured for the production of landfill gas for generation of renewable energy at the Power Station.</p> <p>Veolia have plans to extract more landfill gas and thus increase the capacity of the Power Station in two stages. The first stage is to add a single generator in 2021 and then a further seven generators at a later date yet to be determined. Ancillary infrastructure is also planned including a new gas blower and a third flare.</p>		
O6.16	<p>The flare system must provide a destruction efficiency of volatile organic compounds, air toxics and odours of not less than 98%. The flare must be at ground-level and shrouded. The flare must be provided with automatic combustion air control, automatic shut-off gas valve and automatic re-start system.</p> <p>Note: The following combinations of minimum performance specifications will be deemed to have achieved a destruction efficiency of 98 per cent. Alternative minimum performance specifications must be justified by the licensee.</p> <p><i>Refer to table in EPL</i></p>	<ul style="list-style-type: none"> 2018 AEPR 2019 AEPR 2020 AEPR 2018 AEMR 2019 AEMR 2020 AEMR Ektimo Pty Ltd, Emission Testing Report, Report Numbers R006204, R008159 and R009352, 08/10/18, 30/09/19 and 	<p>Minimum performance of flares is deemed to be achieved based on temperature and residence time. Temperature and gas flowrate, which is proportional to residence time, are monitored continuously. The Auditors reviewed a sample of monitoring data which demonstrated compliance.</p> <p>The Auditors note that residence time has been reported in the 2018 and 2019 AEMRs and AEPRs as an average of <0.3 seconds whereas, to be compliant it should be >0.3 seconds (assuming</p>	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		30/09/20, respectively	<p>temperature of 1,000°C). In the 2020 AEMR, residence time was reported >0.3 seconds.</p> <p>It is also observed that both residence time and temperature should not be reported as static but should be reported with minimum, maximum and average values in the Annual Returns. The Auditors recommend as an opportunity for improvement that Veolia consider modifying future Annual Returns and AEPRs / AEMRs to show minimum, maximum and average values.</p>		
O6.17	<p>The landfill gas fired power station must provide a minimum destruction efficiency of 98% for volatile organic compounds, air toxics and odours, and the discharge point(s) must be designed (ie. Stack height, diameter, discharge velocity etc.) to ensure that the design ground-level concentration criteria specified in the following tables are not exceeded at any location at or beyond the boundary of the premises.</p> <p><i>Refer to table in EPL</i></p>	<ul style="list-style-type: none"> Ektimo Pty Ltd, Emission Testing Report, Report Numbers R006204, R008159 and R009352, 08/10/18, 30/09/19 and 30/09/20, respectively 	<p>Performance of the gas engines was measured during the annual emissions testing by Ektimo. Ektimo reported VOC destruction efficiency greater than 98% in 2018 and 2020 complying with the condition. In 2019 the VOC destruction efficiency was reported at 98% that Ektimo stated "<i>cannot be deemed definitively compliant or non-compliant</i>" due to a 19% uncertainty level (which would also apply to the reported compliances in 2018 and 2020). Based on the 2019 Ektimo report, the Total VOCs measured at the LFG Inlet (Point 5) and the Engine 1 Exhaust Stack (EPA Point 8) were 56 g/min and 1.8 g/min, respectively. The destruction efficiency</p>	Non-compliant	NC13

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			<p>would therefore be calculated to be 96.8% for Engine 1, which in the Auditors' opinion represents a non-compliance, although acknowledging the uncertainty level. The Auditors consider that the Ektimo report should have reported the destruction efficiency as 96.8%, not 98% (this is considered potentially misleading), and the result should have been reported as a non-compliance, with appropriate text regarding the uncertainty.</p> <p>The Auditors recommend that future gas engine emission test reports, report the calculated destruction efficiency correctly and that Veolia report potential non-compliances as required under the EPL.</p> <p>Ground level concentrations of sulfuric acid, sulfur dioxide, nitrogen dioxide and hydrogen sulphide beyond the site boundary are not monitored and cannot be verified by the Auditors.</p>		
O6.18	Prior to installation, the licensee must provide manufacturer's performance guarantees for all plant and equipment, demonstrating to the satisfaction of the EPA that emissions of air pollutants from the flare and landfill gas fired power station will comply with the Protection of the Environment Operations (Clean Air) Regulation 2002 and with the design	<ul style="list-style-type: none"> Veolia email correspondence to EPA, EPL 11436 – Manufacturer's Performance Guarantee for Stand Alone Flare Stack, 11/02/2021 	The Auditors note an error in the condition in referring to conditions O5.16 and 5.17. It is assumed the correct references are conditions O6.16 and O6.17. The condition also refers to an outdated regulation. On this basis, the Auditors assume this condition relates to the installation of the original equipment	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	parameters specified in conditions O5.16 and O5.17. In addition, prior to installation of the landfill gas fired power station, the licensee must carry out dispersion modelling and prepare a report to the satisfaction of the EPA that demonstrates that the stack diameters and heights of the discharge points have been designed in an acceptable manner.	<ul style="list-style-type: none"> Veolia, Manufacturer's Performance Guarantee for Stand Alone Flare Stack, 11/02/2021 	<p>and has been assessed in prior audit periods.</p> <p>Veolia advised of the scheduled installation of a stand-alone flare stack. The Auditors viewed a manufacturer's performance guarantee prepared by Uniflare and provided to the EPA.</p>		
O6.19	Any landfill gas condensate must be collected and returned to the leachate recycling system.	<ul style="list-style-type: none"> 2018 LEMP 2018 LMP 	Condensate is injected into the waste in the void or directed to the leachate extraction system. The Auditors have no reason to believe this condition is not being met.	Compliant	
O6.20	The landfill gas extraction and utilisation system must be designed and installed to withstand forces created by the weight and settlement of waste in the landfill.		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
O6.21	All pipework carrying landfill gas adjacent to the haul road must be designed and installed so it is protected from damage as a result of haulage activities.		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
O6.22	The licensee must apply biofiltration media, or another material as approved in writing by the EPA, at the waste/rock interface around the perimeter of the landfill void to reduce odour from fugitive gas emissions.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	Veolia have advised biofiltration media is applied at the waste surface/rock interface. The material is sourced locally and documented in the weight bridge records.	Compliant	
O6.23	The licensee must not exhumate any landfilled waste unless approved in writing by the EPA.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia advised no waste has been exhumed at the site.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
O6.24	Vehicles leaving the premises must not track materials to external surfaces.	<ul style="list-style-type: none"> Site visit on 17/03/2021 Interview with Veolia personnel, 17/03/2021 	<p>Veolia have advised all trucks which carry containerised waste are enclosed or covered.</p> <p>All trucks observed during the site visit were observed enclosed.</p>	Compliant	
O6.25	The licensee must provide a report to the EPA which details the design, construction, operation and rehabilitation of any new landfill cell. This report must be submitted to the EPA at least six months before the licensee intends to construct the cell, and it must include details on a QA/QC program which can demonstrate that the cell was constructed to meet its design specifications.			Not triggered	
O6.26	The licensee must take all practical measures to prevent litter leaving the premises	<ul style="list-style-type: none"> Site visit on 17/03/2021 	The facility is maintained in good condition, with no litter observed beyond the landfill during the site visit.	Compliant	
O6.27	Treated leachate from the Leachate Treatment Plant (LTP) must not be discharged to any part of ED1, other than the lined coffer dam.	<ul style="list-style-type: none"> 2018 AEMR 2019 AEMR 2020 AEMR 2018 LMP 	<p>The LTP was commissioned on 04/10/18 with the first discharge to the coffer dam on 26/04/19.</p> <p>Procedures in accordance with the condition are detailed in the LMP. The Auditors have no reason to believe this condition is not being met.</p>	Compliant	
O6.28	Effluent from the activated sludge leachate treatment system must not be discharged to the ED1 coffer dam.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 2018 LMP 	Veolia have advised no discharge has been discharged to the ED1 coffer dam. The Auditors have no reason to believe this condition is not being met.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
O6.29	ED3N must be emptied of effluent from the activated sludge leachate treatment system by 31 December 2023.			Not triggered	
O6.30	The licensee is permitted to undertake an alternative daily cover trial at the tip face over a 6 month period, beginning on the first day the alternative daily cover is applied. The trial must be conducted in accordance with the following documents: 1. the document titled "Alternative Daily Cover Trial - Woodlawn Bioreactor - December 2019" prepared by Veolia Environmental Services (Australia) Pty Ltd and dated 12 December 2019; 2. the letter of clarification from the licensee to the EPA dated 30 January 2019; 3. the letter from Michael Assal of The Odour Unit Pty Ltd titled "Alternative Daily Cover - Odour Trial Study - Proposal" and dated 16 December 2019; and 4. the EPA's Environmental Guidelines: Solid Waste Landfills (2nd Edition, 2016).	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 TOU, Alternative Daily Cover – Odour Trial Study, 16/12/2020 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	Documentation provided confirms the alternative daily cover trial was undertaken in accordance with this condition.	Compliant	
O6.31	Within 90 days of the commencement of the trial referenced in condition O6.30, the licensee must provide the EPA with a progress report for the trial. The report must be submitted by email to waste.operations@epa.nsw.gov.au and include, but need not be limited to: 1. a discussion of the outcomes of the trial so far;	<ul style="list-style-type: none"> Veolia, NSW Woodlawn Bioreactor Alternative Daily Cover Trial Progress Report, 24/08/2020 Veolia email correspondence, Woodlawn Bioreactor 	<p>The alternative daily cover trial commenced on 25th May 2020. The progress report was issued on Wednesday 26th August 2020, 93 days since the commencement of the trial.</p> <p>As the report has been issued, no further actions have been recommended.</p>	Non-compliant	NC14

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	2. photographs of the ADC prior to, during, and after placement at the tip face; 3. data on the quantities of MWOO used in the trial so far; and 4. discussion of any issues or concerns encountered during the trial so far.	ADC Trial Progress Report, 26/08/2020			
O6.32	Within 30 days of the completion of the trial referenced in condition O6.30, the licensee must provide the EPA with a report detailing the outcomes of the trial. The report must be prepared by a suitably qualified independent consultant and include, but need not be limited to: 1. an assessment of the effectiveness of the ADC in meeting the required outcomes for the covering of waste outlined in the Environmental Guidelines: Solid Waste Landfills (2nd Edition, 2016); 2. photographs of the ADC prior to, during, and after placement at the tip face; 3. a benchmark of the ADC's performance against VENM as a daily cover; 4. a quantitative evaluation of the ADC in regards to its odour release potential and odour impacts as an applied ADC; 5. an assessment of the difference in ambient odour impacts from the active tip face for each scenario assessed in the trial; 6. an interpretation of the quantitative and qualitative data generated during the trial; and	<ul style="list-style-type: none"> TOU, Alternative Daily Cover – Odour Trial Study, 16/12/2020 Veolia email correspondence, Woodlawn ADC Odour Trial Study Final Report, 18/12/2020 	The trial was completed on 25 th November 2020. A report was subsequently prepared and submitted within 30 days of the completion of the trial on 18 th December 2020. The report has been prepared in accordance with the condition.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	7. an assessment of whether the ADC is suitable for use on an ongoing basis. The report must be submitted to waste.operations@epa.nsw.gov.au				
5 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.	<ul style="list-style-type: none"> • Interview with Veolia personnel, 17/03/2021 • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11436 Annual Return • 2019 EPL 11436 Annual Return • 2020 EPL 11436 Annual Return 	The results of monitoring required to be conducted by this licence or a load calculation protocol are recorded in the Annual Returns, AEPRs and AEMRs.	Compliant	
M1.2	All records required to be kept by this licence must be: 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.	<ul style="list-style-type: none"> • Interview with Veolia personnel, 17/03/2021 • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR 	All records are reported in the Annual Returns, AEPRs and AEMRs. The Auditors have no reason to believe the condition has not been met.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 2020 EPL 11436 Annual Return 			
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.	<ul style="list-style-type: none"> A selection of tabulated monitoring records from 2018 - 2020 	The Auditors reviewed sampling records. Records were provided in accordance with this condition of consent.	Compliant	
M2 Requirement to monitor concentration of pollutants discharged					
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 2020 EPL 11436 Annual Return 	All monitoring is undertaken in accordance with the specified requirements of EPL.	Compliant	
M2.2	Air monitoring requirements <i>Refer to tables in EPL</i>	<ul style="list-style-type: none"> 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 	Annual Returns for past three reporting periods since the last IEA were reviewed. The Auditors have no reason to believe this condition has not been met.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> 2020 EPL 11436 Annual Return 			
M2.3	Water and/ or Land Monitoring Requirements <i>Refer to tables in EPL</i>	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 2020 EPL 11436 Annual Return 	<p>Annual Returns for the past three reporting periods since the last IEA were reviewed. Sample frequency was not achieved for some surface water monitoring points in the 2017/18, 2018/19 and 2019/20 reporting period due to insufficient flow. Sample frequency was not achieved for some groundwater monitoring points in the 2017/18 due to limited seepage. Although the missing samples were reported by Veolia in the Annual Returns as non-compliances, the Auditors are of the opinion that they do not represent non-compliances as it was out of their control that there was insufficient water to collect, most likely due to the drought.</p> <p>Veolia have advised additional sampling of surface water monitoring points following rainfall events have now been included to increase sample frequency in accordance with the consent.</p>	Compliant	
M3 Testing methods - concentration limits					
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:	<ul style="list-style-type: none"> 2018 AEPR 2019 AEPR 2020 AEPR 2018 AEMR 	Monitoring methodology is reported in the annual reports. The Auditors have no reason to believe the condition has not been met.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	<ul style="list-style-type: none"> • 2019 AEMR • 2020 AEMR • 2018 EPL 11436 Annual Return • 2019 EPL 11436 Annual Return • 2020 EPL 11436 Annual Return 			
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.			Not triggered	
M4 Weather monitoring					
M4.1	The licensee must undertake the following monitoring of meteorological parameters in accordance with the methods and frequencies specified in the table below. <i>Refer to table in EPL</i>	<ul style="list-style-type: none"> • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11436 Annual Return • 2019 EPL 11436 Annual Return • 2020 EPL 11436 Annual Return 	Monitoring of the meteorological parameters are undertaken and reported in the Annual reports. The Auditors have no reason to believe this condition is not being met.	Compliant	
M5 Recording of pollution complaints					

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
M5.1	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.	<ul style="list-style-type: none"> Woodlawn Bioreactor Complaints Register 	A complaints register was reviewed by the Auditors. The Auditors have no reason to believe this condition has not been met.	Compliant	
M5.2	The record must include details of the following: 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.	<ul style="list-style-type: none"> Woodlawn Bioreactor Complaints Register 	The Auditors reviewed the complaints register considered to be implemented in accordance with Condition M5.2	Compliant	
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Woodlawn Bioreactor Complaints Register 	Veolia have advised records are retained within Veolia's internal system The Auditors have no reason to believe this condition has not been met.	Compliant	
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.			Noted	
M6 Telephone complaints line					
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints	<ul style="list-style-type: none"> Call conducted to complaints number 	The Auditors called the complaints number which was answered.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	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.				
M6.2	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.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Site visit on 17/03/2021. 2018 LEMP 	Veolia advertises the complaints line number (and the EPA pollution line number) in the Tarago Times monthly publication. The complaints line number is also in the LEMP which is available on the Veolia website. The Auditors also sighted the number on the entrance sign.	Compliant	
M6.3	The preceding two conditions do not apply until the date of the issue of this licence (or preceding if replacement).			Noted	
M7 Requirement to monitor volume or mass					
M7.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below. <i>Refer to table in EPL</i>	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	The approved method is by inspection of a calibrated post or survey of water level. Water levels are recorded monthly.	Compliant	
M8 Other monitoring and recording conditions					
M8.1	The licensee must maintain a log of the run-times of all mechanical evaporators used at the premises. The log must identify the dam on which the evaporator was used, the start and finish time of the run, and the volume of liquid pumped through the evaporator during each run.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Site visit on 17/03/2021 Veolia email to Ramboll, Re. 	Veolia advised the recording of evaporators used at the site were previously undertaken on an ad hoc basis which run times were able to be ascertained as required from operational staff. Since late 2020 / early 2021 a continuous monitoring system has been	Non-compliant	NC15

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		Evaporator Run time Log, 06/04/2021	implemented where the evaporators are connected to Veolia's control system. The Auditors viewed the system which has now been implemented during the site visit. No further actions are recommended by the Auditors as the system has now been implemented.		
6 Reporting Conditions					
R1 Annual return documents					
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: a) a Statement of Compliance; and b) a Monitoring and Complaints Summary. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	<ul style="list-style-type: none"> EPA website www.epa.nsw.gov.au 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 2020 EPL 11436 Annual Return 	Annual Returns for the three reporting periods since the last IEA were reviewed. The EPA website confirms that these Annual Returns were received by the EPA.	Compliant	
R1.2	An Annual Return must be prepared in respect of each reporting period.			Noted	
R1.3	Where this licence is transferred from the licensee to a new licensee: 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			Not triggered	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	is granted and ending on the last day of the reporting period.				
R1.4	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: 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.			Not triggered	
R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period.	<ul style="list-style-type: none"> EPA website www.epa.nsw.gov.au 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 2020 EPL 11436 Annual Return 	The EPA website records the 2017/18, 2018/19 and 2019/20 Annual Return date received as being within 60-day period. The Auditors have no reason to believe the condition has not been met.	Compliant	
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.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia has advised that copies of the Annual Returns are retained within Veolia's internal system. The Auditors have no reason to believe the condition has not been met.	Compliant	
R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or	<ul style="list-style-type: none"> 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 	The copy of the 2017/18, 2018/19 and 2019/20 Annual Return provided to the Auditors was unsigned; however, the EPA has acknowledged receipt of the Annual Return and the Auditors have no reason	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	<ul style="list-style-type: none"> 2020 EPL 11436 Annual Return 	to believe the condition has not been met.		
R1.8	<p>The Annual Return must be accompanied by / or include an Annual Report which must contain an assessment of environmental performance relevant to licence conditions including:</p> <p>a) tabulated results of all monitoring data required to be collected by this licence;</p> <p>b) a graphical presentation of data from at least the last three years (if available) in order to show variability and / or trends. Any statistically significant variations or anomalies should be highlighted and explained;</p> <p>c) an analysis and interpretation of all monitoring data;</p> <p>d) an analysis of and response to any complaints received;</p> <p>e) identification of any deficiencies in environmental performance identified by the monitoring data, trends or incidents and of remedial action taken or proposed to be taken to address these deficiencies; and</p> <p>f) recommendations on improving the environmental performance of the facility.</p>	<ul style="list-style-type: none"> 2018 AEPR 2019 AEPR 2020 AEPR 2018 AEMR 2019 AEMR 2020 AEMR 2018 EPL 11436 Annual Return 2019 EPL 11436 Annual Return 2020 EPL 11436 Annual Return Environment Protection Licence 11436 – Licence variation notice 1590396 has been issued, 04/03/2020 Earth2Water Pty Ltd, Veolia Woodlawn Bioreactor – EMP for ED1 & ED2, 27/09/2018 Veolia, RE: Condition U2.1 of EPL 11436 – Management Plan – Evaporation Dam Seepage, 28/09/2018 	<p>Annual Returns, AEPRs and AEMRs for the 2017/18, 2018/19 and 2019/20 reporting periods were reviewed. Trend graphs are provided in Annual Environmental Monitoring Report.</p> <p>As specified in EPA correspondence regarding licence variation, progress and implementation on the evaporation dam seepage management strategy has been presented in the 2019 and 2020 AEPRs.</p>	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
R2 Notification of environmental harm					
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	<ul style="list-style-type: none"> Veolia, Letter to EPA, Re: Gas Extraction System Failure, 12/06/2020 	<p>Veolia advised a communications fault between the gas extraction booster and the control system occurred on 01/06/20 which caused the risk of fugitive gas and potential odour emissions. Veolia reported the incident to the EPA hotline.</p> <p>The Auditors do not consider the incident as causing environmental harm; however, note that procedures were in place in accordance with this condition.</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. <i>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.</i>	<ul style="list-style-type: none"> Veolia, Letter to EPA, Re: Gas Extraction System Failure, 12/06/2020 	<p>Following the communications fault between the gas extraction booster and the control system, a report was provided 11 days after which the incident occurred to the EPA.</p> <p>The Auditors do not consider the incident as causing environmental harm. The Auditors do recommend any future notifications require the report to be provided within 7 days of the notification to the EPA.</p>	Not triggered	
R2.3	The licensee must notify the EPA within 24 hours if the subsurface gas monitoring required by condition M2.1 indicates a methane gas concentration greater than 1% (v/v).			Not triggered	
R3 Written report					

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: 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 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.			Noted	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.			Noted	
R3.3	The request may require a report which includes any or all of the information (listed in the condition).			Noted	
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.			Noted	
R3.5	Whenever the height of the saturation level in the waste is above the height of the groundwater table that surrounds the perimeter of the mine void, the licensee must	<ul style="list-style-type: none"> Sie interview with Veolia personnel 		Not triggered	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	provide a written report to the EPA within 3 months				
R3.6	The report must contain the following information: a) the height of the saturation level of the leachate in the mine void and the height of the groundwater at the perimeter of the mine void; and b) a program of actions to reduce the height of leachate in the mine void and the expected time duration for the actions and works.			Noted	
R4 Other reporting conditions					
R4.1	Whenever the volume of water stored in Evaporation Dam 3 reaches the freeboard level in condition O6.4, the licensee must notify the EPA in accordance with the requirements of R2 and provide a written report to the EPA within 1 month. The report must contain the following information: a) the volume of water stored in Evaporation Dam 3; and b) a program of actions to reduce volume of water stored in Evaporation Dam 3 below the 0.5m freeboard level and/or a program for the design and construction of works to increase the capacity of Evaporation Dam 3 to maintain the freeboard to contain the rainfall from a 1:100 year ARI storm of 72 hours duration, and the expected time duration for the actions and works.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 		Not triggered	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
R4.2	<p>Within 24 hours of receipt of an odour complaint, the Licensee must provide the EPA with a written report.</p> <p>The report must include the following information:</p> <p>a) The date, time and duration of the odour incident;</p> <p>b) A description of the nature of the odour;</p> <p>c) The meteorological conditions prevailing at the same time the odour was reported;</p> <p>d) The location(s) of the place where the odour was detected;</p> <p>e) The circumstances in which the odour incident occurred (including the cause of the odour, if known);</p> <p>f) Time and date stamped photographs of the active landfill cell showing intermediate and daily cover;</p> <p>g) The action taken or proposed to be taken to deal with the incident, including follow-up contact with any complainants;</p> <p>h) Details of any measures taken or proposed to be taken to prevent or mitigate against a recurrence of such an incident; and</p> <p>i) The current level of leachate in each pond.</p>	<ul style="list-style-type: none"> • 2018 EPL 11436 Annual Return • 2019 EPL 11436 Annual Return • 2020 EPL 11436 Annual Return • Woodlawn Bioreactor Complaints Register • Veolia, WL – Eco-Precinct Odour Complaint Response, 20/04/2020 • Veolia email to EPA Re: HPE CM: Re: Odour complaint – Tarago Public School – 28 May 2020, 29/05/2020, • Veolia email to EPA, Re: Odour complaint – Barnet Drive, Mt Fairy – 10 July 2020, 10/07/2020 • Veolia email to EPA, Re: Odour Complaint – Tarago Village – Monday 1st February 2021, 03/02/2021 • Veolia email to EPA, Re: Odour Complaint – 2744 Braidwood 	<p>The Auditors reviewed a sample of reports to the EPA relating to 4 complaints in 2020 and 2021. The reports provided the required information. The Auditors note that 3 of the 4 reports reviewed were provided more than 24 hours after the complaints were received.</p> <p>The Auditors recommend Veolia review the complaints response process and consider appropriate corrective actions to ensure that the 24-hour report requirement is met on an ongoing basis.</p>	Non-compliant	NC16

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		Road, Lake Bathurst – Monday 8 th March 2021, 10/03/2021			
7 General Conditions					
G1 Copy of licence kept at the premises or plant					
G1.1	A copy of this licence must be kept at the premises to which the licence applies (and available for inspection under G1.3).	<ul style="list-style-type: none"> Site visit on 17/03/2021 	The licence was observed by the Auditors within the administration building at the entrance to the site.	Compliant	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.			Noted	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.			Noted	
8 Pollution Studies and Reduction Programs					
U1 Longterm Leachate Treatment Solution					
U1.1	By 30 September 2018, the licensee must install, commission and implement the longterm leachate management solution detailed in the report titled "Longterm Leachate Treatment Solution Submission Report" submitted to the EPA on 5 August 2016 (as revised).	<ul style="list-style-type: none"> 2018 AEPR 2018 AEMR 2018 EPL 11436 Annual Return 	The Leachate Treatment Plant was commissioned on 04/10/18 four days after the stipulated completion date of 30/09/18. Details regarding the install, commissioning and implementation are reported in the 2018/2019 EPL 11436 Annual Return reporting period. No further actions are recommended by the Auditors as the report has been provided. Refer to PA 10_0012, 4.18E.	Refer to PA 10_0012, 4.18E	Refer to NC4
U1.2	The membrane bioreactor (MBR) leachate treatment plant component of the longterm leachate management solution must be capable of continuously treating at least 4L/s of leachate.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Site visit on 17/03/2021 	Since the start of operations at the leachate treatment plant, throughput has been less than the required 4L/s. It has been reported by SLR that an annual average of 2.1 L/s was achieved during	Non-compliant	NC17

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<i>Note: The longterm leachate treatment solution will require a modification to the premises' Development Approval.</i>	<ul style="list-style-type: none"> • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2019 LWMS Audit • 2020 LWMS Audit 	<p>2019-20 and a report for daily throughout viewed on site for 16/03/21 documented 3.009L/s.</p> <p>Veolia have advised treating of leachate is a priority and continued improvements are being undertaken to achieve 4L/s. Currently, Veolia is managing the extraction rate of the raw leachate to cooperate with the LTP performance. Based on the information provided and reviewed by the Auditors, the Auditors do not consider there is currently an issue with too much leachate onsite. However, the Auditors recommend that Veolia continue to optimise the LTP performance to achieve the required minimum 4 L/s leachate treatment rate.</p>		
U1.3	<p>Unless otherwise agreed to in writing by the EPA, the licensee must submit a monthly report detailing progress on the commissioning and process optimisation of the Leachate Treatment Plant (LTP). The report must include, but not necessarily be limited to, the following:</p> <ol style="list-style-type: none"> 1. a brief narrative on the progress of the LTP commissioning and optimisation process; 2. Leachate extraction rate from the void; 3. quality of the input feed into the LTP; 4. discharge quality from the LTP; 5. graphical representation of monitoring data captured in the last month; 	<ul style="list-style-type: none"> • Selection of Monthly Report – Long-term Leachate Treatment Solution (LLTS) Project between December 2019 – February 2021 	The Auditors reviewed a selection of monthly reports between December 2019 and February 2021. Of the reports which were sighted by the Auditors, the reports have been submitted on the fifth business day of the month.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	6. performance of the LTP during the last month; and 7. a description of any anticipated or actual risks to the operations of the LTP and the measures being implemented to mitigate those risks. The report must be submitted electronically on the fifth business day of the month for the previous month's activities.				
9 Special Conditions					
E1 Financial assurance					
E1.1	A financial assurance comprising an unconditional and irrevocable bank guarantee in favour of the EPA, in the amount of five million three hundred and eighty thousand dollars (\$5,380,000), must be provided to the EPA. This financial assurance is required for the works and programs required by or under this licence. <i>Refer to EPL for additional requirements for Financial Assurance</i>		This condition has been audited previously and is not relevant to the current Audit period.	Not triggered	
E1.2	The original bank guarantee must be provided to the EPA and be in a form approved by the EPA.	<ul style="list-style-type: none"> ANZ Guarantee No. DG368313418, Amendment No. 4, 29/08/2018 EPA Email to Veolia, Re. 2018 Financial Assurance, 21/08/2018 	The Auditors reviewed correspondence regarding the confirmation of the original bank guarantee. The Auditors have no reason to believe the condition was not met.	Compliant	
E1.3	The Financial Assurance must contain a term that provides that any money claimed can be			Noted	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	paid to the EPA or, at the written direction of the EPA, to any other person.				
E1.4	This financial assurance shall be adjusted each financial year in the following manner: a) the amount of the bank guarantee shall be increased by an amount equal to two hundred and twenty five thousand seven hundred and ninety dollars (\$225,790) adjusted by a percentage equal to the percentage increase in the Consumer Price Index between the June quarter of 2004 and the June quarter of the current year, plus b) an amount equal to that needed to increase the previous year's financial assurance by a percentage equal to the percentage increase in the Consumer Price Index between the June quarter of the preceding year and the June quarter of the current year.	<ul style="list-style-type: none"> EPA Email to Veolia, Re. 2018 Financial Assurance, 21/08/2018 EPA Email to Veolia, Re. 2019 Financial Assurance, 09/08/2019 EPA Email to Veolia, Re. Re: Waste Compliance – RWC - IN – 2020 – Veolia Environmental Services (Australia) Pty Ltd - 2020 Financial Assurance, Calculations - EPL 11436, 24/08/2020 	The Auditors reviewed correspondence regarding the confirmation of adjusted financial assurances for 2018-2020. The Auditors have no reason to believe the condition was not met.	Compliant	
E1.5	The licensee must: a) ensure the bank guarantee is adjusted as required under E1.4, and b) provide the adjusted bank guarantee to the EPA by the Licence Anniversary Date each year.	<ul style="list-style-type: none"> EPA Email to Veolia, Re. 2018 Financial Assurance, 21/08/2018 Ves Bank Guarantee Request submitted by Henry Gundry dated 26/08/20 Ves Bank Guarantee Request submitted 	The Auditors reviewed documentation regarding the confirmation of adjusted financial assurances for 2018-2020 which were provided by the licence anniversary date. The Auditors have no reason to believe the condition was not met.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<p>by Henry Gundry dated 14/08/19</p> <ul style="list-style-type: none"> EPA Email to Veolia, Re. 2019 Financial Assurance, 09/08/2019 EPA Email to Veolia, Re. Re: Waste Compliance – RWC - IN – 2020 – Veolia Environmental Services (Australia) Pty Ltd - 2020 Financial Assurance, Calculations - EPL 11436, 24/08/2020 			
E1.6	The licensee must maintain the financial assurance at the full amount as adjusted under E1.4 during the operation of the facility and thereafter until such time as the EPA is satisfied the premises are environmentally secure.	<ul style="list-style-type: none"> EPA Email to Veolia, Re. 2018 Financial Assurance, 21/08/2018 EPA Email to Veolia, Re. 2019 Financial Assurance, 09/08/2019 EPA Email to Veolia, Re. Re: Waste Compliance – RWC - IN – 2020 – Veolia Environmental Services (Australia) Pty Ltd - 2020 	The Auditors reviewed correspondence regarding the confirmation of adjusted financial assurances for 2018-2020.	Compliant	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		Financial Assurance, Calculations - EPL 11436, 24/08/2020			
E1.7	The licensee must replenish the financial assurance to the full amount as adjusted under E1.4 if the EPA claims on or realises the financial assurance or any part of it to carry out or have carried out any work or program covered by the financial assurance if the licensee fails to carry out that work or program upon being given notice to do so.			Not triggered	
E1.8	The EPA may increase the amount of the financial assurance at any time as a result of a revised estimate of the total likely costs and expenses of remediation of the premises.			Not triggered	
E1.9	The financial assurance adjustment required in Condition E1.4 requires the calculation of two amounts which need to be added to the financial assurance of the previous year to arrive at the amount for the financial assurance for the current year to be submitted by the licensee: Condition E1.4 (a) = \$225,790 x A/B, where; A = the CPI Index Number (A) figure published by the Australian Bureau of Statistics for Sydney for the June quarter of the current calendar year, and B = the CPI Index Number (A) figure published by the Australian Bureau of Statistics for Sydney for the June quarter of 2004. This CPI Index Number is 145.5.	<ul style="list-style-type: none"> EPA Email to Veolia, Re. 2018 Financial Assurance, 21/08/2018 EPA Email to Veolia, Re. 2019 Financial Assurance, 09/08/2019 EPA Email to Veolia, Re. Re: Waste Compliance – RWC - IN – 2020 – Veolia Environmental Services (Australia) Pty Ltd - 2020 Financial Assurance, 	Veolia provided calculations to the EPA and the EPA subsequently confirmed via email that the calculations were correct and confirmed the final figure for the financial assurance.	Noted	

Table A-3: Compliance with Conditions of EPL 11436 Woodlawn Bioreactor					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<p>Condition E1.4 (b) = $(FA \times A/C) - FA$, where; A = the CPI Index Number (A) figure published by the Australian Bureau of Statistics for Sydney for the June quarter of the current calendar year, C = the CPI Index Number (A) figure published by the Australian Bureau of Statistics for Sydney for the June quarter of the previous calendar year, and FA = the total financial assurance amount for the previous year. The total amount of the financial assurance to be submitted to the EPA for the current year is: $FA_{new} = FA + \text{Condition E1.4 (a)} + \text{Condition E1.4 (b)}$, where; FA_{new} = the total financial assurance amount for the current year CPI means the Consumer Price Index Number (A) for Sydney (All Groups) published by the Australian Bureau of Statistics.</p>	<p>Calculations - EPL 11436, 24/08/2020</p>			

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
1 Administrative conditions					
A1 What the licence authorises and regulates					
A1.1	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 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.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	<p>The only scheduled activity that is carried out by the licensee is waste transfer in accordance with conditions of this licence.</p> <p>It should be noted that no maximum scale is noted in this EPL condition however the scale of waste received at the Crisps Creek IMF is limited by the scale noted in the Woodlawn Bioreactor planning approvals and EPL.</p>	Compliant	
A1.2	The only scheduled activity that may be carried on by the licensee is waste transfer in accordance with the conditions of this licence.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	The only scheduled activity that is carried on by the licensee is waste transfer in accordance with conditions of this licence.	Compliant	
2 Premises to which this licence applies					
A2.1	The licence applies to the following premises: <i>Refer to table in EPL</i>			Noted	
A3 Information supplied to 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. In this condition the reference to "the licence application" includes a reference to:	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia has advised all works and activities are being carried out in accordance with this condition.	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(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 (b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.				
A3.2	The Woodlawn Bioreactor Landfill Environmental Management Plan, April 2001 prepared by Maunsell McIntyre Pty Ltd and submitted with the licence application (the Landfill Environmental Management Plan) and including any future amendments is not to be taken as part of the documentation in A4.1, other than those parts specifically referenced in this licence. A copy of the Landfill Environmental Management Plan may be viewed at the EPA's South Coast Regional Office.			Noted	
2 Discharges to air and water and applications to land					
P1 Location of monitoring/discharge points and areas					
P1.1	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point. <i>Refer to table in EPL</i>	<ul style="list-style-type: none"> • 2018 LEMP • 2016 IMF EMP • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • EPL 11455 Annual Return, 06/09/17 – 	<p>Monitoring locations are documented in the LEMP and the IMF EMP. Monitoring results are presented in the Annual Returns, AEPRs and AEMRs.</p> <p>Previously reported in the last audit period, the dust deposition gauge (location No 4/ DG18) was incorrectly shown at the western end of the IMF on the IMF EMP plan and it was recommended that the location on the IMF EMP plan should be updated.</p>	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		05/09/18 (2018 EPL 11455 Annual Return) • EPL 11455 Annual Return, 06/09/18-05/09/19 (2019 EPL 11455 Annual Return) • EPL 11455 Annual Return, 06/09/19 – 05/09/20 (2020 EPL 11455 Annual Return) • Drawing No. 16735-16, Issue A, 14/04/20	<p>The drawing showing the EPL monitoring locations (Drawing No. 16735-16) still shows DG18 as being at the western end of the site and not near the site office as observed during the site visit, although the drawing does not indicate where the entrance and site office are located. The Auditors understand that the location may have been previously moved for safety reasons.</p> <p>The Auditors recommend as an opportunity for improvement that the EPL monitoring location plan be reviewed in consultation with the EPA to ensure that the dust gauge samples are being collected in the approved location.</p>		
P1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.		Not applicable – no table in this condition	Not triggered	
P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. <i>Refer to table in EPL.</i>	• 2018 LEMP • 2016 IMF EMP • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR	Monitoring locations are documented in the LEMP and IMF EMP. Monitoring results are reported in the Annual Returns, AEMRs and AEPRs.	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> • 2020 AEMR • 2018 EPL 11455 Annual Return • 2019 EPL 11455 Annual Return • 2020 EPL 11455 Annual Return 			
3 Limit conditions					
L1 Pollution of waters					
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	<ul style="list-style-type: none"> • 2016 IMF EMP • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11455 Annual Return • 2019 EPL 11455 Annual Return • 2020 EPL 11455 Annual Return 	<p>Surface and storm water is collected into an onsite first flush system. Testing is undertaken following rainfall events prior to discharge to Mulwaree River.</p> <p>Monitoring locations are documented in the IMF EMP. Monitoring results are reported in the Annual Returns, AEMRs and AEPRs.</p> <p>Documentation provided is in accordance with this condition.</p>	Compliant	
L1.2	There must be no discharge of contaminated stormwater from the premises under dry weather conditions or storm event(s) of less than 1:100 year, 24 hour duration, average recurrence interval.	<ul style="list-style-type: none"> • 2016 IMF EMP • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR 	No contaminated stormwater has reportedly been discharged from the site during the audit period. Stormwater is diverted to onsite first flush system for storage and testing.	Compliant	
L2 Waste					

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
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. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <p><i>Refer to table in EPL</i></p>	<ul style="list-style-type: none"> • Interview with Veolia personnel, 17/03/2021 • Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	<p>The site receives waste in accordance with this condition. The containerised waste is monitored at the Clyde and Banksmeadow Transfer Terminals at point of loading containers. Weighbridge records were reviewed by the Auditors.</p>	Compliant	
L2.2	<p>There must be no storage of waste on site, including sludges and containers of waste, except with the written approval of the EPA if such storage is required by the Police and/or because the operation, personnel or equipment are endangered.</p>	<ul style="list-style-type: none"> • Interview with Veolia personnel, 17/03/2021 • 2016 IMF EMP • EPA Letter Re. Environment Protection Licence 11455 – Approval for temporary storage of waste, 25/08/2020 	<p>Veolia advised no containers are stored overnight at the IMF with the exception of one event during the audit period. A derailment between Goulburn and Tarago caused the closure of the rail line which required containers to be stored at the IMF overnight. This event was consulted with the EPA in accordance with the contingencies outlined in the IMF EMP.</p>	Compliant	
L3 Noise Limits					

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
L3.1	Except as provided in condition L6.2, noise from the premises must not exceed an LAeq (15 minute) noise emission criterion of 35 dB(A) at the most affected residential receiver.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Woodlawn Bioreactor Complaints Register 	<p>No noise compliant were received during the Audit period. The Auditors have no reason to believe this condition is not being met.</p> <p>It should be noted that the licence does not contain condition L6.2. The Auditors note this should be a reference to condition L3.2.</p>	Compliant	
L3.2	Noise emissions from freight trains entering and leaving the premises must not exceed the noise limit of 45 dB(A) LAeq (15 minutes) prior to 7:00 am and 50 dB(A) LAeq (15 minutes) after 7:00 am. These limits apply only where there are no more than two freight trains entering and leaving the premises per day, otherwise the limit in condition L6.1 applies.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Woodlawn Bioreactor Complaints Register 	<p>No noise complaints were received during the Audit period. The Auditors have no reason to believe this condition is not being met.</p> <p>It should be noted that the licence does not contain condition L6.1. The Auditors note this should be a reference to condition L3.1.</p>	Compliant	
L3.3	For the purpose of Conditions L6.1 and L6.2: a) The LAeq noise level must be measured or computed at the most affected residential receiver over a period of 15 minutes using "FAST" response on the sound level meter. In the case of condition L6.2, the period is the duration of a train entering and/or leaving the premises if this is less than 15 minutes. b) 5dB(A) must be added to the measured level if the noise is substantially tonal or impulsive in character. c) Measurement locations are: i) for night time (10 pm to 7 am) assessment – 1 metre from the façade of the residence; and ii) for day time (7 am to 10 pm) assessment – at the residential boundary or 30 metres from the residence where the boundary is more than 30 metres from the residence.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Woodlawn Bioreactor Complaints Register 2016 IMF EMP 	<p>The IMF EMP states that the noise modelling for the EA predicted that standard activities at the IMF would not exceed the criteria at the nearest sensitive receivers. The IMF EMP requires noise monitoring to be conducted if noise complaints are received. No complaints have been received and, as such, monitoring has not been conducted. The Auditors have no reason to believe the condition has not been met.</p> <p>It should be noted that the licence does not contain conditions L6.1 and L6.2. The Auditors note these should be references to conditions L3.1 and L3.2 respectively.</p>	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	d) The noise emission limits apply for prevailing meteorological conditions and winds up to 3 metres per second, except under conditions of temperature inversions.				
L4 Hours of Operation					
L4.1	All operational activities at the premises including road haulage may only be conducted between 6:00 am to 10:00 pm on Mondays to Saturdays. There must be no activities on Sundays or public holidays.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia advised that operations are generally conducted between 6:30am to 4.00pm for haulage of waste from the IMF to the bioreactor as dependent upon train movements.	Compliant	
L5 Potentially offensive odour					
L5.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	<ul style="list-style-type: none"> 2019 IOA 2020 IOA Site visit on 17/03/2021 Woodlawn Bioreactor Complaints Register 2018 AEPR 2019 AEPR 2020 AEPR 	Two Independent Odour Audits (IOA) have been conducted of the Woodlawn facility since the IEA in 2018. Both the 2019 and the 2020 IOA conducted a brief downwind assessment for the IMF to determine presence of waste-based odour. The IOAs did not find any evidence of any waste-based odour being emitted and on this basis, classifies the IMF as a very low risk source in terms of odour. Both the 2019 and 2020 IOA reports state that "no samples were collected from the IMF as all waste transportation is a fully contained process until the displacement of the contents into the Void via the mobile tipping platform." The 2019 IOA reports a 62% increase in odour complaints and the 2020 IOA reports a 81% decrease in odour complaints; however, no specific analysis is presented in relation to the IMF.	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			<p>The IOAs note that a review of washing practices associated with the sealed containers and maintenance of the sealed containers should be undertaken to facilitate in the minimisation of odour.</p> <p>The AEPRs for 2018-2020 reports that no odour complaints relating to the IMF have been received.</p> <p>The Auditors did not detect offensive odours during the Audit visit to the IMF.</p>		
4 Operating Conditions					
O1 Activities must be carried out in a competent manner					
O1.1	<p>Licensed activities must be carried out in a competent manner.</p> <p>This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.</p>	<ul style="list-style-type: none"> • 2016 IMF EMP • Interview with Veolia personnel, 17/03/2021 • A selection of operator training records and internal management policies 	<p>Operations at the site are conducted in accordance with the IMF EMP and Veolia's ISO 9001 quality and ISO 14001 environmental management system.</p> <p>A selection of Veolia's internal policies and their maintenance schedule and the training and competency records for operators were viewed as part of the audit.</p>	Compliant	
O2 Maintenance of plant and equipment					
O2.1	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <p>a) must be maintained in a proper and efficient condition; and</p> <p>b) must be operated in a proper and efficient manner.</p>	<ul style="list-style-type: none"> • Interview with Veolia personnel, 17/03/2021 • A selection of operator training records 	<p>Veolia's maintenance schedule and the training and competency records for operators had been viewed. Veolia also participates in the National Heavy Vehicle Accreditation Scheme. Maintenance and operational performance is audited under the scheme.</p>	Compliant	
O3 Dust					

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
O3.1	The operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	<ul style="list-style-type: none"> Site visit on 17/03/2021 2018 AEPR 2019 AEPR 2020 AEPR 2018 AEMR 2019 AEMR 2020 AEMR 2018 EPL 11455 Annual Return 2019 EPL 11455 Annual Return 2020 EPL 11455 Annual Return 	<p>The Auditors did not witness dust being generated at the IMF site during the site visit. It should be noted that the site visit was undertaken during a period of rainfall.</p> <p>Depositional dust sampling equipment is located on site. Samples are undertaken monthly and reported in the AEMRs, Annual Returns and AEPRs which have shown reasonably consistent results.</p> <p>The Auditors have no reason to believe this condition is not being met.</p>	Compliant	
O3.2	Trucks entering or leaving the premises and carrying excavated dusty materials including clays, sands and soils must be covered at all times, except during loading and unloading.	<ul style="list-style-type: none"> Site visit on 17/03/2021 Interview with Veolia personnel, 17/03/2021 	<p>Veolia have advised all trucks which carry containerised waste are enclosed.</p> <p>All trucks observed during the site visit were observed enclosed. It should be noted that the site visit was undertaken during a period of rainfall.</p>	Compliant	
O3.3	All sealed and unsealed surfaces must be managed to minimise the quantity of wind blown dust emissions.	<ul style="list-style-type: none"> Site visit on 17/03/2021 	No truck wheel track out was evident at the IMF site access onto Bungadore Road and fugitive dust emissions were not observed as trucks exited the site. It should be noted that the site visit was undertaken during a period of rainfall.	Compliant	
O4 Emergency Response					
O4.1	The licensee must extinguish fires at the premises as soon as possible.	<ul style="list-style-type: none"> 2016 IMF EMP 2020 ERP 	Fire emergency procedures and training are noted in the IMF EMP and Emergency	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> Site visit on 17/03/2021 	Response Plan. Equipment was observed by the Auditors.		
O5 Waste management					
O5.1	Vehicles leaving the premises must not track materials to external surfaces.	<ul style="list-style-type: none"> Site visit on 17/03/2021 Interview with Veolia personnel, 17/03/2021 	<p>Veolia have advised all trucks which carry containerised waste are enclosed.</p> <p>All trucks observed during the site visit were observed enclosed.</p>	Compliant	
O5.2	All containers must be designed, constructed and maintained to prevent the emission of offensive odour and be water tight to prevent the leakage of leachate from waste containers during transport and handling activities.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia have advised all containers have been designed in accordance with this condition. Carbon filters and door vales are installed into the container design to reduce offensive odours. No leakages of leachate have been reported from waste containers.	Compliant	
O5.3	All pressure relief valves on the containers must be fitted with appropriate mechanisms to filter and remove odours.	<ul style="list-style-type: none"> Site visit on 17/03/2021 Interview with Veolia personnel, 17/03/2021 	Veolia have advised door valves are installed into the container design to filter and remove odours. The Auditors observed the door valves during the site visit.	Compliant	
Other operating conditions					
O6.1	Paved and sealed areas must be provided with a first flush stormwater management system designed to capture the first 15 millimetres of stormwater for each square metre of catchment area. The paved and sealed areas must also extend to include any rail unloading areas.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Site visit 17/03/2021 2018 AEPR 	Veolia have advised that the first flush stormwater management system has been designed in accordance with this condition. The Auditors observed the first flush stormwater system during a period of rainfall.	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
O6.2	All areas that involve the handling of containerised waste including container transfer and handling areas, clean container storage areas and internal roadways must be sealed.	<ul style="list-style-type: none"> Site visit on 17/03/2021 	The Auditors observed all container handling areas and roadway areas at the site were sealed.	Compliant	
O6.3	Contaminated stormwater and any sludges collected at the premises must be disposed of at the Woodlawn Bioreactor Facility (Environment Protection Licence No. 11436).	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Waste Inventory (PWS Records) Waste Tracking 2018; 2019; 2020 	Veolia have advised all liquids at the site are transferred to the Woodlawn Bioreactor. Details are tracked in the weight bridge records The Auditors have no reason to believe this hasn't been met.	Compliant	
O6.4	There must be no vehicle or container wash down at the premises.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Site visit on 17/03/2021 	Veolia advised no vehicles or containers are washed at the Crisps Creek IMF. No wash down is undertaken at the site. The Auditors did not observe any vehicles or containers being washed at the site or areas where washing would occur.	Compliant	
O6.5	All sewage generated on the premises must be disposed of into the sewerage system at the Woodlawn Bioreactor Facility (Environment Protection Licence No. 11436).	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 2018 AEPR 2019 AEPR 2020 AEPR 	Veolia have advised and reported that no sewage has been removed from the site. The Auditors have no reason to believe this hasn't been met.	Compliant	
O6.6.	Uncontaminated stormwater collected by the first flush system may be applied to vegetated areas at the premises in a manner that does not exceed the capacity of the areas to effectively utilise the stormwater. For the purpose of this condition, "effectively utilise" includes the use of stormwater for the	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia has advised no stormwater is used and applied to vegetated areas at the site. The Auditors have no reason to believe this hasn't been met.	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	irrigation of grassed areas and planted trees or shrubs as well as the ability of the vegetation and soil to absorb the nutrient, salt and hydraulic loads and organic material in the stormwater.				
5 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.	<ul style="list-style-type: none"> • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11455 Annual Return • 2019 EPL 11455 Annual Return • 2020 EPL 11455 Annual Return 	The results of monitoring required to be conducted by this licence or a load calculation protocol are recorded in the Annual Returns, AEMRs and AEPRs.	Compliant	
M1.2	All records required to be kept by this licence must be: 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.	<ul style="list-style-type: none"> • Interview with Veolia personnel, 17/03/2021 • 2018 AEPR • 2019 AEPR • 2020 AEPR • 2018 AEMR • 2019 AEMR • 2020 AEMR • 2018 EPL 11455 Annual Return 	All records are reported in the Annual Returns, AEPRs and AEMRs and are located on the Veolia website and Veolia's internal system The Auditors have no reason to believe the condition has not been met.	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		<ul style="list-style-type: none"> 2019 EPL 11455 Annual Return 2020 EPL 11455 Annual Return 			
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	<ul style="list-style-type: none"> A selection of tabulated monitoring records 2018 - 2020 	The Auditors reviewed sampling records. Records were in accordance with this condition.	Compliant	
M2 Requirement to monitor concentration of pollutants discharged					
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	All monitoring is undertaken in accordance with the specified requirements of EPL.	Compliant	
M2.2	Air Monitoring Requirements (Refer to table in EPL)	<ul style="list-style-type: none"> 2018 EPL 11455 Annual Return 2019 EPL 11455 Annual Return 2020 EPL 11455 Annual Return Site visit 17/03/2021 	Annual Returns for the past three reporting periods since the last IEA were reviewed. The Auditors observed the air monitoring location at the site.	Compliant	
M2.3	Water and/ or Land Monitoring Requirements (Refer to table in EPL)	<ul style="list-style-type: none"> Interview with Veolia 	Monitoring points 1 and 2 did not meet the required frequency for sampling during the monitoring periods due to insufficient flow.	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		personnel, 17/03/2021 <ul style="list-style-type: none"> 2018 EPL 11455 Annual Return 2019 EPL 11455 Annual Return 2020 EPL 11455 Annual Return 	Although the missing samples were reported by Veolia in the Annual Returns as non-compliances, the Auditors are of the opinion that they do not represent non-compliances as it was out of their control that there was insufficient water to collect, most likely due to the drought. Veolia have advised that additional sampling of these locations has been implemented following periods of heavy rainfall to achieve the required quantity of samples.		
M2.4	Siting of point 4 must be in accordance with Method AM-1 in the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 2019 EPL 11455 Annual Return Site visit on 17/03/2021 	Veolia have advised monitoring is undertaken in accordance with the licence. The Auditors observed the sampling location at the site and have no reason to believe this condition hasn't been met.	Compliant	
M2.5	The EPA will review the need to monitor particulates-deposited matter at point 4 after twelve months operation of the premises.	<ul style="list-style-type: none"> 2019 EPL 11455 Annual Return 	Point 4 reporting was provided to the EPA in the Annual Return 18/19. No non-compliances were identified in regards to this condition. The Auditors have no reason to believe this condition hasn't been met.	Compliant	
M3 Testing methods – concentration limits					
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or	<ul style="list-style-type: none"> 2018 AEPR 2019 AEPR 2020 AEPR 2018 AEMR 2019 AEMR 	Air monitoring undertaken at the site is taken on a continuous basis using the AM-19 method. The Auditors have no reason to believe this condition hasn't been met.	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	<ul style="list-style-type: none"> 2020 AEMR 2018 EPL 11455 Annual Return 2019 EPL 11455 Annual Return 2020 EPL 11455 Annual Return 			
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted. <i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i>			Noted	
M4 Recording of pollution complaints					
M4.1	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.	<ul style="list-style-type: none"> Woodlawn Bioreactor Complaints Register 	A complaints register was reviewed by the Auditors. The Auditors have no reason to believe this condition has not been met.	Compliant	
M4.2	The record must include details of the following: 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;	<ul style="list-style-type: none"> Woodlawn Bioreactor Complaints Register 	The Auditors reviewed the complaints register considered to be implemented in accordance with Condition M4.2	Compliant	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	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.				
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 Woodlawn Bioreactor Complaints Register 	Veolia have advised records are retained within Veolia's internal system The Auditors have no reason to believe this condition has not been met.	Compliant	
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.			Noted	
M5 Telephone complaints line					
M5.1	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.	<ul style="list-style-type: none"> Call conducted to complaints number 	The Auditors called the complaints number which was answered.	Compliant	
M5.2	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.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 2016 IMF EMP Site visit on 17/03/2021 	Veolia advertises the complaints line number (and the EPA pollution line number) in the Tarago Times monthly publication. The complaints line number is also in the IMF EMP which is available on the Veolia website and on the front sign at the entrance to the facility.	Compliant	
M5.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.			Noted	
6 Reporting Conditions					

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
R1 Annual return documents					
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	<ul style="list-style-type: none"> EPA website www.epa.nsw.gov.au 2018 EPL 11455 Annual Return 2019 EPL 11455 Annual Return 2020 EPL 11455 Annual Return 	Annual Returns for the three reporting periods since the last IEA were reviewed. The EPA website confirms that these Annual Returns were received by the EPA.	Compliant	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.			Noted	
R1.3	Where this licence is transferred from the licensee to a new licensee: 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.			Not triggered	
R1.4	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			Not triggered	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	period commencing on the first day of the reporting period and ending on: 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').	<ul style="list-style-type: none"> EPA website www.epa.nsw.gov.au 2018 EPL 11455 Annual Return 2019 EPL 11455 Annual Return 2020 EPL 11455 Annual Return 	The EPA website records the 2017/18, 2018/19 and 2019/20 Annual Returns were received as being within 60 day period. The Auditors have no reason to believe the condition has not been met.	Compliant	
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.	<ul style="list-style-type: none"> Interview with Veolia personnel, 17/03/2021 	Veolia has advised that copies of the Annual Returns are retained within Veolia's internal system. The Auditors have no reason to believe the condition has not been met.	Compliant	
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder. <i>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.</i> <i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i>	<ul style="list-style-type: none"> 2018 EPL 11455 Annual Return 2019 EPL 11455 Annual Return 2020 EPL 11455 Annual Return 	The copy of the 2017/18, 2018/19 and 2019/20 Annual Returns provided to the Auditors was unsigned; however, the EPA has acknowledged receipt of the Annual Return and the Auditors have no reason to believe the condition has not been met.	Compliant	
R2 Notification of environmental harm					

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.			Noted	
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. <i>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.</i>			Noted	
R3 Written report					
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: 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 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.			Noted	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.			Noted	
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the			Noted	

Table A-4: Conditions of EPL 11455 - Intermodal Facility					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.				
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.			Noted	
7 General Conditions					
G1 Copy of licence kept at the premises or plant					
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	<ul style="list-style-type: none"> Site visit on 17/03/2021 	The licence was observed by the Auditors within the administration building at the entrance to the site.	Compliant	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.			Noted	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.			Noted	

APPENDIX B

AUDIT TEAM

VICTORIA SEDWICK

Principal

Victoria Sedwick has over 30 years' experience in chemical manufacturing and environmental consulting. Her areas of expertise include environmental auditing, health and safety auditing; mergers and acquisition due diligence; and EHS management systems; contaminated site assessment and remediation advice; sustainability; and chemical safety and dangerous goods management. Consulting experience includes chemical manufacturing; ports and transportation infrastructure; aerospace manufacturing and airline industries; energy, power generation and distribution; downstream petroleum (refining, distribution and retail) and upstream gas; mining equipment; building products manufacturing; defence facilities; mining, metals and minerals processing; explosives; waste management; tourism; pharmaceutical, food and beverage manufacturing; packaging industries. She has managed environmental health and safety due diligence and compliance programs of many multinational and high-profile acquisitions and divestments, and she provides strategic advice on several large contaminated sites projects and assurance programs. Victoria is certified as a lead environmental auditor on the Exemplar Global (formerly RABQSA) register.

CAREER

2007 - Present

Principal, Ramboll Australia Pty Ltd (formerly ENVIRON)

Environmental consulting in due diligence, compliance, site investigations and remediation and the Australia and New Zealand Compliance, Strategy and Transaction Service Line Co-ordinator. 1992-2007

Senior Principal, URS Australia Pty Ltd (formerly AGC Woodward-Clyde)

Environmental consulting in due diligence, compliance and site investigations.

1988-1992

Senior Risk Management Consultant, Marsh and McLennan (now Marsh)

EHS consulting in compliance auditing and due diligence.

1980-1988

Chemist and National Risk Manager, AC Hatrick Chemicals Pty Ltd

EDUCATION

Master of Engineering Science

University of New South Wales, Sydney, Australia

Bachelor of Applied Science, Chemistry

University of Technology, Sydney, Australia



CONTACT INFORMATION

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Level 3, 100 Pacific Highway,
(PO Box 560)
North Sydney 2060
NSW, Australia

RELEVANT AUDITING AND REVIEW EXPERIENCE

Environmental Compliance Audit of an Ammonium Nitrate Storage Facility

Compliance audit of an ammonium nitrate storage facility as required under the development consent. The audit addressed compliance with the Environment Protection Licence and the Consent Conditions as well as requiring groundwater contamination from past operations on the site and the adjacent landfill.

Environmental Audit of Paint Manufacturing Business

Environmental compliance audit of a paint manufacturing facility based in South Australia against corporate EHS standards and local regulatory requirements.

Environmental Health and Safety Audits of Timber Business

EHS compliance audits of a wood products and timber treatment chemicals manufacturing business for sites in Australia and New Zealand.

Environmental Health and Safety Audits of Building Products Manufacturing Business

EHS management system and compliance audits of a building products manufacturing business based in Australia which included brick and masonry manufacturing sites and quarries.

Environmental Health and Safety Review of Chemical Manufacturing Business

Review of EHS management systems and compliance of a chemicals business based in Australia, New Zealand, Asia and South America.

Process Safety Review of Mining Business

Peer reviewer of process safety management systems of a gold mining business based in Australia, New Guinea, Asia and Africa.

Environmental Compliance Audit of Industrial Chemicals Business in Australia and New Zealand

Compliance review of facilities for an industrial chemicals manufacturer supplying alkyd and polyester resins, organometallics and water-based polymer emulsions for the paint and fiberglass industries.

EHS Compliance Audits for Various Manufacturing Facilities in New Zealand

EHS compliance audits of facilities in New Zealand against corporate standards and local EHS regulations. Packaging manufacturer comprised specific review of dangerous goods storage for solvent based inks and air quality and odour management.

Environmental Due Diligence Review of Packaging Business

Review of environmental liabilities (land contamination, planning, sustainability, air quality and noise) prior to the acquisition of a packaging business in Australia and New Zealand. Support post integration services for the successful purchaser.

Environmental Due Diligence of Pharmaceutical Business

Review of environmental liabilities (land contamination, chemical management and compliance) for a potential acquisition of a pharmaceutical business in New Zealand.

Environmental Compliance Audit of School Development

Independent environmental audit for Department of Education as required under the Development Consent for the facilities. Compliance issues related to dust management, waste management and traffic.

Environmental Compliance Audit of Commercial Development

Independent environmental audit for a heritage listed facility as required under the Development Consent for the facilities.

Environmental Compliance Audit of a Waste Facility Development

Independent environmental audit for Veolia as required under the Development Consent for the facilities. Compliance issues related to dust management, odour, leachate and wastewater management and hazardous wastes.

Environmental Compliance Audit of a Waste Transfer Facility, Landfill and a New Development

Environmental compliance audits for Veolia as required under the Development Consent for the facilities. Compliance issues related to dust management, odour, leachate and wastewater management and hazardous wastes.

Environmental Advice

Provision of advice in the use of phenolic resins for a client importing the resins for manufacturing in Australia.

Environmental Due Diligence Review of Infrastructure

Review of environmental liabilities (land contamination, planning, sustainability, air quality and noise) for a potential investment in a large infrastructure project.

Environmental Site Assessments and Environmental Compliance Reviews

Managed the assessments of a global portfolio of building products manufacturing sites.

Explosives Manufacturer in Brazil, United Kingdom, Canada, United States

Environmental due diligence review of global explosives manufacturing facilities prior to acquisition.

Environmental Health and Safety Compliance Auditing and Environmental Management

Managed environmental programs for hydroelectric generator, which included compliance audits, training of internal auditors and development of their EMS.

Environmental Compliance Review of a Waste Recovery Facility in New South Wales

Compliance review to support the waste recovery business following action by NSW EPA. Follow-on advice in relation to water and wastewater management at the facility.

Environmental Health and Safety Due Diligence Review of steel manufacturing facilities in Western Australia, Queensland and New South Wales

Desk top review of documents including vendor due diligence reports prior to acquisition of the business and sites.

Environmental Review of Offshore Gas – Papua New Guinea

Reviewer of environmental due diligence for the financing of the development and commercialisation of a wet gas reservoir at an offshore gas field in the Gulf Province of Papua New Guinea. Proposed and historical activities at the site were reviewed, including an assessment of the impacts and residual risk associated with a loss of well control which occurred during exploratory drilling in the 1980s.

Wind Farms and Transmission Lines

Project direction and peer review of environmental due diligence for the financing of proposed wind farms and associated transmission lines. Reviews included State and, where applicable, Commonwealth approvals and assessment of biodiversity offset requirements. In some cases, an Equator Principles gap analysis was undertaken.

Independent Environmental Audit for Veolia Australia and New Zealand

Compliance Audit of the Woodlawn Bioreactor and Crisps Creek Intermodal, Banksmeadow Transfer Terminal, Clyde Transfer Terminal, Camelia as required under development consent and Environment Protection Licence conditions.

Independent Environmental Audit for Viva Energy, Australia

Compliance Audit of Refinery Conversion following closure of old Shell Clyde refinery and conversion to a terminal as required under development consent conditions.

Health and Safety and Chemical Management

Conducted environmental health and safety audits of a wide range of facilities including chemical, timber treatment chemical plants, logistics, construction and general manufacturing.

Environmental Health and Safety Compliance Auditing and Environmental Management

Conducted EHS compliance audits for a timber company with plantations, production plants and timber treatment plants.

ESG DD of Metallurgical Coal Business

Environmental Social and Governance due diligence review and advice regards compliance of two coal mines and one coal project in central Queensland.

Limited Assurance of emissions for New Zealand Emissions Trading Scheme and CDP

Confidential Building Products manufacturer, New Zealand, Australia

Limited Assurance of selected facilities for the NZ ETS and the company's CDP.

EHS Compliance Audits for a Manufacturer's Facilities in Australia, Spain, Taiwan, Province of China, United States, New Zealand, United Kingdom

EHS Compliance Audits of various building products manufacturing sites and construction projects against corporate standards and local regulations.

EHS Compliance Audits for Johnson & Johnson, Australia

EHS compliance audits of J&J Medical facilities in each state of Australia and New Zealand against corporate standards and local EHS regulations.

EHS Audits for AGL

Environmental health and safety compliance and management systems reviews prior to the acquisition of hydroelectric power, gas-fired cogeneration plants, coal seam gas processing plant and pipelines and wind farms in New South Wales, Queensland, Victoria and South Australia for several energy companies.

Transaction – Port Privatisations

Environmental due diligence for a bidding consortium in the privatisation of Port of Brisbane, Port of Darwin, Newcastle Port, Port Kembla and Port Botany including review of tenant occupied facilities. Work involved management interviews and review of vendor environmental due diligence reports, including site assessments prepared by each government's environmental advisor. The due diligence included reviewing environmental management; compliance; asbestos management; legacy site contamination sediment and dredging management; and a gap analysis against Equator Principles for the lenders.

Downstream Petroleum – Shell Australia

Environmental liabilities review in the due diligence for the acquisition of a major downstream petroleum business (Shell Australia) with refining, distribution and retail facilities in Australia for a confidential consortium.

Marine Terminals

Environmental review for the investment in a marine terminals business with locations in South America, UK, Turkey, the US and Asia.

EDD of Desalination Plant privatization transaction

Environmental due diligence of a desalination plant assessing planning approvals, environmental impact on marine environment and legacy land contamination. Particular advice was required in relation to ecological issues and legacy asbestos issues from the use of contaminated concrete aggregate and following remediation.

Independent Environmental Audits and Hazard Audits for Planning Approvals

The preparation of independent environmental audit and hazard audits for several organisations in chemical storage, brewery, concrete tile manufacturer, and chemical logistics.

Environmental Advice for Aerospace Business

Environmental health and safety review including remediation and regulatory advice for the closure of an aerospace manufacturing facility located on Commonwealth land in Australia. Significant issues including asbestos management, chlorinated solvents and a plating shop.

EDD for a port privatization- Port of Brisbane

Environmental due diligence of the Port of Brisbane. The due diligence included review of environmental management and compliance, ecological risks, dredging management, legacy contamination and a gap analysis against Equator Principles for the lenders.

Environmental Due Diligence in Australia and New Zealand

Due diligence investigations for acquisitions in the chemical, agrichemical, petroleum refining and retail operations and waste management industry for Australian investment firms, Australian and US private equity and Chinese manufacturers.

BHP Billiton, South Africa

Environmental health and safety (EHS) and corporate social responsibility due diligence and financial risk modelling for mining and minerals processing facilities in South Africa for a large multinational mining and manufacturing company.

Vendor Environmental Due Diligence of Manufacturing Facilities in Spain, France, Germany, Finland, Taiwan, China, Thailand, United States and the United Kingdom

Environmental Due Diligence of building products manufacturing sites to assess liabilities for land contamination and compliance with local regulations.

EMILY ROWE

Managing Consultant

Emily Rowe is an Environment, Health and Safety (EHS) Specialist with over 20 years of experience in consulting and over ten years operational experience working at Caltex's Kurnell Refineries in its EHS department. She is experienced in conducting EHS audits for regulatory compliance, contamination liability and due diligence purposes. She has also audited Environmental Management Systems (EMS) and achieved ISO 14001 EMS Certification at Caltex's Kurnell Refineries. She has conducted work health and safety audits for a range of different facilities, provided risk assessment training and conducted risk assessment workshops with management staff. Emily is highly skilled in regulatory reporting, hazardous chemical and waste management.



CAREER

2018-present

Managing Consultant, Ramboll

2007-2015

Environmental Engineer, Caltex Refineries (NSW) Pty Ltd

1992-2007

Associate Environmental Engineer, URS Australia Pty Ltd

EDUCATION

2014

Graduate Certificate of Sustainability

University of New England, Australia

1991

B Engineering (Chemical)

University of Sydney, Australia

COURSES/CERTIFICATIONS

Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, with the following Scopes of Certification: Site Contamination Assessment and Regulatory Compliance Audit, Certificate Number 204997, 14 February 2020.
National WHS General Construction Induction Training, 7 January 2015.
ISO 9001 Appreciation and Interpretation Training Course and Internal QMS Auditor Training Course, Lloyds Register, 2013 .
Environmental Management System Auditing, ANDSAM, 2011.
Lead Auditor Course in Environmental Management System, ETRS, 2004.

CONTACT INFORMATION

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RELEVANT EXPERIENCE

Ramboll Australia Pty Ltd

2018 – present

EHS Compliance and Due Diligence Audits

2020

Safety, Health and Environmental Compliance Audit

Conduct of a safety, health and environmental compliance audit of a timber utility pole and post manufacturing facility in Tasmania.

Environmental Review

Conduct of a Phase I environmental site assessment as part of a site exit assessment of a small warehouse and office unit of a gas detection equipment company in Melbourne.

Environmental Health and Safety Due Diligence Review

Conduct of a desktop EHS review of a small commercial unit in Melbourne as part of a global due diligence project.

Environmental Compliance Review

Conduct of a Phase I environmental site assessment and limited environmental compliance review for a metal working facility located in the Newcastle region. This was one of four properties located in Australia and reviewed by Ramboll as part of a global due diligence project.

Environmental Review

Conduct of an environmental review for due diligence purposes of contaminated site investigations of a brake pad manufacturing facility located in rural Victoria.

Eveleigh Workshops Second Environmental Audit

Two follow-up Independent Environmental Audits of the Locomotive Workshops located at Eveleigh, New South Wales. The Locomotive Workshops were audited against the conditions of two Development Consents to assess the environmental performance of its redevelopment during its construction and commencement of occupation.

EHS Compliance and Management System Audit

Conduct of an EHS regulatory compliance audit of two sites located in rural NSW and Canberra, including a satellite ground station.

Environmental Compliance Audit

Conduct of an environmental compliance audit of a brick making and quarry operation in Sydney.

Environmental Review

Conduct of a Preliminary Site Investigation for a car sales and service centre located in Sydney.

Provision of Health and Safety Support Services

Provided health and safety support services to a global jewellery retailer with boutiques located in Sydney, Melbourne and Brisbane. Services have included conduct of EHS reviews using the 'Enhesa ScoreCard', provision of risk assessment training and running risk assessment workshops for preparing risk assessments for the office, customer service workshop and boutiques.

Safety, Health and Environmental Compliance Audit

Conduct of a safety, health and environmental compliance audit of a chemical terminal in Portland, Victoria.

Desktop Environmental Review

Conduct of a desktop environmental review for due diligence purposes of two sites located in Melbourne.

2019

Preliminary Site Investigation

Conduct of a Preliminary Site Investigation of six over-50s independent living properties in Queensland.

Environmental Compliance Audit

Conduct of an environmental compliance audit of a concrete batching plant in Queensland.

Environmental Review

Conduct of a Phase I environmental site assessment and limited environmental compliance review for a pharmaceutical-type company located in the Auckland region.

Risk Based Audit

Conduct of a five-day Risk Based Audit, responsible for the Air and Noise Management elements, of an alumina refinery in Western Australia.

Site Exit Assessment

Conduct of a Site Exit Assessment of a chemical manufacturing facility in Sydney.

Eveleigh Workshops Environmental Audit

Two Independent Environmental Audits of the Locomotive Workshops located at Eveleigh, New South Wales. The Locomotive Workshops was audited against the conditions of two Development Consents to assess the environmental performance of its redevelopment during its construction.

Due Diligence Environmental Compliance Review

Conduct of an environmental due diligence and compliance review for the transfer of a global chemical manufacturing company including five Australian and New Zealand properties.

Provision of Regulatory Advice in Relation to the Health and Safety Advisor Role

Provision of the advice to a global pharmaceutical company regarding Australian regulatory requirements in relation to the role of a Health and Safety Advisor.

EHS Compliance and Management System Audit

Conduct of a four-day EHS regulatory compliance and management system review of a large retail warehouse in Melbourne for an international retail company.

Work Health, Safety and Environmental Due Diligence Assessment

Conduct of a work health, safety and environment due diligence assessment of an Australian roof top solar panel installation business operation on behalf of an investment bank.

Real Estate Health and Safety Review

Conduct of a health and safety compliance review of an office building in Sydney's Central Business District for an international real estate management company. Provision of the Australian component for a Health and Safety Legislation Comparison Table.

Waste Facility Environmental Audit

Independent Environmental Audit of a waste treatment facility in New South Wales. The facility was audited against the conditions of its Development Consent and Environmental Protection Licence to assess the environmental performance of the development following its construction and commencement of operation.

2018

Public School Redevelopment Environmental Audit

Independent Environmental Audit of a public school redevelopment in New South Wales. The development was audited against the conditions of the Development Consent to assess the environmental performance of the development in the pre-construction and construction phases.

Waste Facility Redevelopment Environmental Audit

Independent Environmental Audit of a waste facility in New South Wales being redeveloped as a materials recycling facility. The facility was audited against the conditions of the Development Consent and Environmental Protection Licence to assess the environmental performance of the development in the construction phase.

Desktop Environmental Compliance Review of Industrial Chemicals Business in Australia and New Zealand

Desktop environmental compliance review of an industrial resins manufacturer business in Australia and New Zealand.

Desktop Review of Environmental Liabilities Due Diligence

Review of environmental liabilities for an acquisition due diligence of an international chemical manufacturing business with sites in Australia, New Zealand, Asia Pacific and South America, my focus being on three Australian sites.

Due Diligence Environmental Compliance Audit

Conduct of Phase 1 environmental site assessment and limited compliance review for a hand tool manufacturing company in New South Wales, as part of a due diligence review for a global company.

EHS Compliance and Management System Audit

EHS compliance and management system review of a heavy underground equipment test facility in Tasmania for a global company.

Contaminated Site Audits

2018

Site Auditor Assistant – Barangaroo Remediation

Assisting the EPA accredited Site Auditor to review documentation relating to the remediation of the Barangaroo Development and preparing relevant Site Audit deliverables.

Caltex Refineries (NSW) Pty Ltd

2007 - 2015

Emily worked as a member of Kurnell Refineries' Environmental Protection Group. She had numerous responsibilities related to the implementation of various Major Project Development Consent Conditions for the Caltex Clean Fuels Project, that were incorporated into the Environment Protection Licence Pollution Studies and Reduction Programs. Some of the projects included:

- Preparation of an Operations Environmental Management Plan, Clean Fuels Project;
- A number of air emission studies and programs relating to point source hydrogen sulphide, sulphur dioxide, nitrogen oxides and particulates emissions, as well fugitive emission of volatile organic compounds and benzene, including determination and negotiation with the EPA of new air emission Licence Limits;
- Noise mitigation program; and
- Odour mitigation program.

She was responsible for Kurnell Refineries' Governance and Regulatory reports including:

- Annual Return;
- National Pollutant Inventory report;
- Environment Protection Licence Monitoring Data on Caltex Public website;
- Dangerous Goods Notifications to WorkCover;
- Review and revision of Major Hazard Facility Safety Report;
- Preparing or reviewing, as required, Environmental Impact Statements and Construction or Operational Environmental Management Plans.

She also project managed environmental monitoring programs including:

- Stack testing program;
- Groundwater monitoring program;
- Installation and monitoring of a Jet Fuel Remediation System;
- Odour Audit Program that involved community participation; and
- Community Groundwater Survey of 40 residential properties in Kurnell.

URS Australia Pty Ltd

1992 - 2007

Conducted numerous EHS audits for compliance , contamination liability, Environmental Management System and due diligence purposes for a range of industrial facilities including:

- Five Sydney Ports Corporation facilities, including the Emergency Response Services and Bulk Liquids Berth;
- Sydney Airport and the Sydney Basin Airports (Bankstown Airport, Camden Airport and Hoxton Park Airport);
- Defence facilities including Richmond, Moorebank, Albatross and Chowder Bay; and
- Chemical manufacturing sites.

2001 – 2007

Emily was seconded to a number of clients to provide environmental management services largely related to preparation of regulatory reports including:

- Master Planning and Environment Department for Sydney Airport Corporation Limited to prepare the 2000- 2001 Annual Environmental Report, reviewing environmental impact assessment and contaminated site investigation reports, preparing tender briefs, updating a contaminated sites database, preparing EMS procedures and liaising with Airport Environment Officers.
- StateRail's Environment Unit to prepare an annual Government Energy Management Policy Report and National Pollutant Inventory Report, as well as Environmental Management System procedures.
- BHBB Cross City Tunnel Joint Venture to prepare two Six Monthly Environmental Performance Reports.
- Caltex Kurnell Refineries to implement the Major Project Development Consent Conditions for the Caltex Clean Fuels Project.

VANESSA WHITE

Environmental Consultant

Vanessa is an Environmental Consultant practising in Environmental, health and safety compliance auditing, site investigations and due diligence. Previously, she has assisted in reviewing hazardous material reports prior to joining Ramboll. She holds a Bachelor of Advanced Science (Earth Science) with prior experience on a range of projects involving site assessment, soil and groundwater sampling and fieldwork management. Her prior background in earth science highlight her interests and skills in the areas of soil use management and groundwater.

Vanessa's experience includes fieldwork, data review, lab and field quality evaluation and report writing. She has been involved in various projects in the public and private sector, including government, manufacturing, public infrastructure and transport, Defence, commercial and property sectors.



CONTACT INFORMATION

Vanessa White

vwhite@ramboll.com

Ramboll
Level 3
100 Pacific Highway, PO Box
560
2060 North Sydney
Australia

CAREER

2017 - Present

Environmental Consultant – Ramboll

2017

Assistant - Prensa

EDUCATION

BAdvSci(Hons)

University of New South Wales, Sydney, Australia

PROJECTS

Manufacturing Facility Environmental Site Assessment and Compliance Review

Environmental compliance audit of a plastics manufacturing facility in Sydney for the due diligence purposes. The scope of the work included a Phase 1 Environmental Site Assessment and limited review of regulatory compliance and other environmental matters. A review of vendor information, previous investigation reports and a site inspection were conducted in achieving the client's goals.

Ammonium Nitrate Facility Independent Environmental Audit Review

Ramboll conducted an independent environmental audit as part of the statutory requirements by the NSW Department of Planning and Environment. The review included a site inspection of the facility including the storage of chemicals and review of environmental

management systems in place. The report provided the client with information on their current site activities.

Environmental Vendor Due Diligence Assessment

As part of a EVDDA, Ramboll provided an assessment for a gear repair and modification facility. The assessment included a site inspection and review of previous investigations to provide information to the vendor to identify and evaluate any potential environmental liabilities from past and present uses.

Soil and Groundwater Monitoring

Vendor due diligence for a site in Cheltenham VIC for sale and leaseback. Scope includes groundwater monitoring, additional investigations, review of various previous environmental reports and response to the Victorian EPA and auditor.

Environmental Due Diligence of Property

Environmental due diligence was conducted for the potential purchase of an industrial site in Villawood, NSW. The site is currently leased to a bus assembly and repair company. The scope of work included review of previous investigation reports, additional research and a site inspection to provide advice in relation to addressing data gaps and conducting further investigation. A targeted Phase II investigation followed including soil and groundwater sampling which provided the client with clarify on initial potential contaminants of concern.

Contaminated land Remediation Claims on behalf of Insurers

Assisting on the multiple detailed reviews of asbestos contamination claims. The scope of works included the review of consultant's reports, site records, general ledgers and invoices and meetings with the parties involved in the claims.

Targeted Soil and Groundwater Investigation for Potential Divestment

The investigation was conducted as part of the environmental due diligence for potential divestment of the site. The work included discussions with the potential purchaser and their environmental consultant, groundwater and soil sampling and the delivery of a targeted assessment of the site.

Phase 2 Soil and Groundwater Environmental Site Assessment

An assessment of soil and groundwater contamination for a proposed residential redevelopment. The investigation included sampling and the delivery of a Phase 2 investigation to advise the Client of the potential contamination risks to lodge a Development Application.

Phase 1 Environmental Site Assessment of Potential Liabilities

Ramboll conducted a Phase I environmental assessment of the property in Pinkenba, Queensland, Australia. The subject industrial property was part of a larger complex occupied by multiple tenants and owned by the investment company. The purpose of this assessment was to allow Ramboll to provide technical support that would assist the Client in rendering legal advice concerning potential liabilities associated with the property.

Phase 1 Environmental Site Assessment

To assist in the due diligence for the provision of finance for a site. The investigation was to identify indicators of potential site contamination from current and historical land uses and included the delivery of a Phase 1 report for the Client.

WestConnex Stage 1B, M4 East

Ramboll has been retained to undertake contaminated land site assessment reporting for the 7km M4 East extension as part of the NSW Government WestConnex road infrastructure project. Vanessa has been involved in undertaking the fieldwork and delivery of making the final landforms following construction suitable for their intended land use. The project included Phase 2 investigations, remedial action plans and validation reports.

Preliminary Site Investigation to Support a Development Application

Ramboll were retained by the Client to undertake a preliminary site assessment of an existing commercial/ residential facility to support documentation for the Development Application submitted to Council. The assessment provided clarity on the historical land use of the area and the potential migration sources from off-site properties.

PFAS Investigation

Targeted Phase 2 contamination investigation of soil, sediment and groundwater for PFAS contamination of a site known to have used fire-fighting foam. Ramboll were retained to investigate the site as part of a proposed residential redevelopment. Of particular concern and subsequently closed out by the report was the potential for off-site migration to a nearby creek and the re-use of impacted top soil within the future residential redevelopment.

Depot Phase 1 ESA

A Phase 1 Environmental Site Assessment of a Council depot prior to divestment of the property. Previously used for vehicle maintenance, the project included a site inspection and review of previous investigation reports, historical and publicly available information.

SHAUN TAYLOR

Senior Managing Consultant

Shaun has more than 22 years of environmental consulting experience in Australia and the Middle East, primarily in the field of environmental impact assessments, management and approvals. Shaun has extensive experience in the management of multi-disciplinary teams, having managed various environmental assessment and management projects throughout the Hunter Region and NSW.

While his experience is across a wide range of developments, it has included numerous linear infrastructure developments, including electrical power transmission, gas supply, water and sewer infrastructure, roads and bridges, and rail and associated infrastructure. Shaun has developed a working understanding of the wide number of local, state and federal government agencies that play a role in the approval of state significant and other major linear infrastructure.

The role of managing environmental assessments also requires good iterative relationships with, and an understanding of the requirements of, the associated engineering design teams and the infrastructure owners and managers.

EDUCATION

1993-1996

B App Sc (Env Assessment & Management) (Hons)

University of Newcastle, Newcastle, Australia

MEMBERSHIPS AND CERTIFICATIONS

Member Environmental Institute of Australia and New Zealand
Certified Environmental Practitioner (Impact Assessment)

PROJECTS

Junee to Griffith Rail Upgrade Review of Environmental Factors/ John Holland Rail/ 2019

Ramboll has been commissioned by John Holland Rail (JHR) to prepare a Review of Environmental Factors (REF) for the upgrade of the Junee to Griffith rail line on the NSW Country Rail Network (CRN). The upgrade included the re-railing and repair works to over 160km of rail track.

Shaun is the Project Manager and is responsible for peer review of the REF and specialist consultant reports, and overall project coordination.



CONTACT INFORMATION

Shaun Taylor

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Suite 18, 50 Glebe Road
PO Box 435
2291 The Junction
Australia

Environmental Approvals and Environmental Management Advice, Tarago Siding Upgrade/ John Holland Rail/ 2019

John Holland Rail (JHR) (on behalf of Transport for NSW) undertook an upgrade of the rail siding at Tarago NSW. Ramboll was commissioned to: undertake additional environmental assessment (including coordination of a construction noise and vibration assessment); prepare additional approval documentation (such as addenda to, and consistency review of, an existing REF); and develop and implement environmental management documents.

Shaun was the Project Manager, coordinating these activities and overseeing the preparation of the documentation.

Hydro Aluminium Kurri Kurri Smelter Remediation and Demolition Project/ Hydro Aluminium Kurri Kurri Pty Ltd/ 2013 – present

Ramboll is the environmental consultant advising on the for the decommissioning, demolition and remediation of a former aluminium smelter in Kurri Kurri, NSW. In this team Shaun is the Environmental Approvals Manager and has been responsible for:

- Preparation of the State Significant Development Environmental Impact Statement (EIS) for the remediation of the former aluminium smelter.
- Preparation of the Statement of Environmental Effects (SEE) for the initial phase of demolition of the former aluminium smelter.
- Preparation of a designated development EIS for the completion of demolition.
- Coordination of the assessments of potential noise and vibration, air quality, traffic, Aboriginal heritage, ecology, soils and water, contamination and visual impacts to support the environmental impact assessments.
- Consultation with the Commonwealth Department of Environment and Energy approval requirements. This included preparation of a referral a variation application and negotiations to avoid the project being deemed a Controlled Action.
- Preparation of the modification application for the temporary storage of spent pot lining in a new building at the smelter.
- Variation of the Environment Protection Licence for the ongoing management of the Smelter site.
- Government agency consultation and assistance with community stakeholder consultation.

Newcastle Road/ Griffiths Road Minor Works REFs for Intersection Upgrades/ Roads and Maritime Services / 2013-2015

Ramboll was commissioned to prepare Minor Works Reviews of Environmental Factors for intersection upgrades. Shaun was the Project Manager for the following:

- Upgrade of the intersection of Griffith Road and Chatham Road, Hamilton.
- Upgrade of the intersection of Newcastle Road and Lloyd Road, Lambton.

Various intersection and road upgrade projects/ Roads and Maritime Services/ 2008-2012

Prior to joining Ramboll Shaun was the Project Director for the following REF that were prepare for and/ or determined by Roads and Maritime Services:

- Safety improvements of the New England Highway, Whittingham
- Upgrade of intersection of Toronto Road, Woodrising
- Tomago Road industrial subdivision access intersection
- Upgrades of intersections of the Pacific Highway, Tomago

GREER LAING

Lead Consultant

Greer is an air quality specialist with experience working across a range of project phases and industries. She has worked on specialist studies for rail, road transport, ports, water, urban design & strategy, power & energy, airports, construction, manufacturing, mining, agriculture, Defence, government and research.

Greer has demonstrated skills in the following:

- Air quality and odour impact assessment
- Air quality and odour monitoring projects and programs
- Dispersion modelling, including simulation using CALMET, CALPUFF, TAPM, AUSPLUME, TANKS etc
- Stack/source monitoring design and advice
- Development of monitoring programs and management plans
- Environmental compliance auditing
- Meteorology monitoring and assessment
- Noise monitoring programs and assessments
- Greenhouse gas assessments
- Environmental monitoring program implementation and management, including water and soil sampling
- Research and development focussed on improved mitigation and control of air pollution

EDUCATION

2009 - 2010

MSc (Research, Environmental Science)

University of Auckland, Auckland, New Zealand

2004 - 2006

BSc (Environmental Science and Biology)

University of Auckland, Auckland, New Zealand

CAREER

2019 – present

Lead Consultant, Ramboll

2015 - 2019

Senior Environmental Scientist / Team Leader, Jacobs

2011 - 2015

Senior Environmental Scientist, Pacific Environment

2009 - 2011

Research Scientist, Aeroqual



CONTACT INFORMATION

Greer Laing

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SELECTED PROJECT EXPERIENCE

ROAD TRANSPORT

2017-2019

WestGate Tunnel Design & Construct project, Melbourne, VIC

- Package lead on the design of stack monitoring systems for the tunnels
- Package lead on the design of the ambient air quality monitoring program

2012-2019

WestConnex Pre-construction and Design & Construct projects, Sydney, NSW

- Design of the stack monitoring program (2017 – 2019)
- Design of the operational ambient air quality monitoring network (2016 – 2017)
- Project management for pre-construction air quality monitoring program (2012 – 2015)

2018

Roads and Maritime M1 to Raymond Terrace noise monitoring

Monitoring of baseline noise to inform the highway upgrade, in Raymond Terrace, NSW.

2015-2016

Ward Civil Sensitive Area Plans

Preparation of SAPs to inform upgrades to the Great Western Highway Safety Upgrade, Mount Victoria, NSW.

2016-2018

Roads and Maritime air quality monitoring program, Berry Highway upgrade

Project management, field work and reporting to determine the baseline air quality prior to construction of a new highway in Berry, NSW.

2016

Douglas Partners Woolgoolga to Ballina highway upgrade air quality management plan

Preparation of an AQMP for use on construction of the highway upgrade, Ballina, NSW.

2017

Roads and Maritime Western Harbour & Beaches Link air quality monitoring location review

Independent review of air quality monitoring station locations, Sydney, NSW.

2017/2018

Supercars Australia Newcastle noise monitoring and community consultation

Door knocking and monitoring to inform the community of potential impacts from the Newcastle race of Supercars, Newcastle, NSW.

2017

Roads and Maritime Reservoir Road upgrade noise monitoring program

Noise monitoring to inform road construction project in Blacktown, NSW.

2018

Confidential due diligence project for large Sydney road tunnel network

Analysis and identification of risks for purchase of roads tunnels in Sydney, NSW.

RAIL

2020

John Holland Rail Lead Management Air Quality Monitoring Program

Technical lead, analysis and reporting for air quality monitoring program in Tarago, NSW

2018-2019

Australian Rail Track Corporation Bylong Tunnel No. 3 air quality monitoring program

Design, implementation and reporting of air quality exposure to inform increases to network capacity, Hunter Valley, NSW.

2016

Australian Rail Track Corporation Inland Rail background air quality report

Baseline air quality study to inform construction Calvert to Kagaru section of Inland Rail, QLD.

2017

Aurizon coal train opacity monitoring program

Establishment of an opacity monitoring program to inform management of the coal train network in QLD.

2015-2016

Transport for NSW Lower Hunter Freight Corridor environmental advice

Advice to support community engagement for the LHRC, Hunter Valley, NSW.

AGRICULTURE

2015 - 2016

Longacres poultry odour assessment

Modelling and reporting for a new poultry farm development near Gunnedah.

2015-2016

Gundamain feedlot odour assessment

Modelling and reporting to determine the potential odour impact of a cattle feedlot expansion in NSW.

PORTS

2016-2017

Department of Premier and Cabinet NSW Cruise Plan options review

Review of environmental factors to inform options for a new cruise terminal, Sydney, NSW.

2017-2018

Noakes Berry Bay floating dry dock noise monitoring

Project management of a multidisciplinary team and monitoring and reporting to inform the noise assessment, Lavender Bay, NSW.

2015-2016

Port Authority of NSW White Bay air quality assessment

Review of emissions and recommendations for improvement at a port in Sydney, NSW.

2017

Newcastle Coal Infrastructure Group meteorological monitoring review

Review and implementation of meteorological monitoring at NCIG port site, Kooragang Island, NSW.

2017

Boral air quality monitoring program

Monitoring to inform dust complaints at the Port site, Kooragang Island, NSW.

2018

Coreview Sydney Cruise Terminal project

Air quality inputs to inform a new cruise terminal in Sydney, NSW.

2015

Queensland Bulk Handlings dust monitoring program

Analysis and reporting of Port of Brisbane dust monitoring program, Brisbane, QLD.

2018-2019

GrainCorp Port Kembla continuous emissions monitoring review

Compliance review of grain terminal emissions, Port Kembla, NSW.

2018-2019

GrainCorp NSW review of environmental monitoring and management systems

Review of compliance against environmental management requires at Port Kembla and Newcastle Carrington Terminal.

WATER

2017

Infrastructure NSW Walsh Bay Arts Precinct Integrated Water Management Plan

Preparation of an IWMP for application to proposed construction projects, Sydney, NSW.

2017

Sydney Water Erskineville flood zone noise monitoring

Noise monitoring to inform works to improve flood risk, Sydney, NSW.

2015

Boneo Sewage treatment plant greenhouse gas assessment

Greenhouse gas assessment to inform STP upgrade, Mornington Peninsula, Victoria.

2016

Queensland Urban Utilities Lowood sewerage schemes upgrade noise monitoring

Noise monitoring to inform proposed upgrades to the WTP, Lowood, QLD.

2018

Yarra Valley Water Aurora Waste to Energy stack monitoring compliance

Review of licensing, commissioning and monitoring for EfW facility in Victoria.

URBAN DESIGN & STRATEGY

2016

Port Authority of NSW Glebe Island options review

Air quality constraints analysis to inform major infrastructure transformation project in the Bays Precinct, Sydney, NSW.

2017

NSW Government Liverpool CBD concept design noise monitoring

Baseline noise monitoring to inform concept design of Liverpool CBD transformation, Sydney, NSW.

2016-2019

Office of Environment and Heritage Audits

Project management and reporting for various audits to determine the cost effectiveness and efficiency of the Upper Hunter and Newcastle Local air quality monitoring networks, Newcastle and the Hunter Valley, NSW.

POWER

2020

Resolute Syama Gold Mine Air Quality Assessment and Review

Air quality monitoring review and advice for a gold mine in Mali, Africa.

2017

Energy Australia Yallourn landfill air quality monitoring program

Project management, field work and reporting to determine the impacts of various air quality sources near the power station.

2016-2018

Santos Moomba solar monitoring program

Monitoring and reporting to determine the solar output for a potential solar development.

2016-2019

Sunset Power solar monitoring program

Monitoring and reporting to determine the impact of a range of environmental conditions for a potential solar development in NSW.

2018

Snowy Hydro Hunter Economic Zone power station air quality assessment

Analysis and reporting of data to apply for modification to site EPL, Hunter Valley, NSW.

2017

Delta Vales Point Power Station emissions controls review

Review of controls to inform Pollution Reduction Program, Central Coast, NSW.

2018

Delta Vales Point noise monitoring complaint monitoring

Various monitoring programs to inform complaint handling in Central Coast, NSW.

2018

AGL Bayswater turbine replacement projects

Air quality assessment to inform upgrade works, Hunter Valley, NSW.

AIRPORTS

2016-2017

Sydney Airport air quality monitoring program design

Project manager and reporting to develop a suitable monitoring program for the airport.

CONSTRUCTION

2019 – 2020

Holcim Environmental Monitoring Program, NSW

Project manager of a multidisciplinary team and reporting

2015-2018

Holcim Environmental Monitoring Program, Rooty Hill

Project manager of a multidisciplinary team, field work and reporting

2015

Holcim Lynwood Quarry air quality assessment review

Independent review of environmental assessment prepared for environmental impact statement.

2017

Downer Teralba asphalt plant air quality assessment

Modelling and reporting to inform the environmental impact statement of a proposed plant in Central Coast, NSW.

MANUFACTURING

2015-2016

Orora noise monitoring program

Monitoring and reporting to inform the impact of the Orora paper mill in Botany, NSW.

2016-2019

Costco annual return preparation

Project manager, modelling and reporting for a range of sites, in preparation of the requires NSW EPA Annual Return.

2016

Veolia storm event analysis

Modelling and reporting to inform damage insurance claims following a significant storm event, Botany Bay, NSW.

MINING

2020

South32 Dendrobium Mine Response to EPA

Project management, data analysis, modelling and reporting for a mine in Wollongong, NSW

2020

Rio Tinto Oyu Tolgoi Air Quality Monitoring Advice

Advice and reporting for a mining project in South Gobi Desert, Mongolia

2020

Erdene Resources Bayan Khundii Air Quality Assessment

Air quality assessment for a gold mining project in Khundii, Mongolia

2016-2018

Glencore Bulga Annual Review

Analysis of environmental data for input into mine annual return.

2015-2019

Yancoal Moolarben forecasting system

Maintenance of an environmental forecasting system to inform operation of Moolarben mine in Ulan.

2017

Glencore Mt Owen air quality assessment

Modelling and reporting to assess the air quality impacts of a proposed modification.

2016

Coal & Allied Mount Thorley Warkworth audit

Review of environmental data to determine compliance, Hunter Valley, NSW.

2015

Yancoal Moolarben environmental audit

Review of environmental data to determine compliance, Hunter Valley, NSW.

2018-2019

Glencore Mt Owen haul road monitoring

Project management, field work and reporting to determine the emissions from the mines haul road network.

2016

Glencore Collinsville air quality monitoring program design

Review of data and advice to improve monitoring program for a mine near Bowen, QLD.

2016

Glencore Mt Owen air quality management plan gap analysis

Review of regulatory documents against AQMP, Hunter Valley, NSW.

2015

United Wambo review

Review of environmental monitoring data to inform an environmental impact statement, Hunter Valley, NSW.

2017

Glencore Bulga air quality monitoring data review

Review of environmental data to inform Annual Return, Hunter Valley, NSW.

2018

Glencore blast fume drone monitoring validation

Analysis, review and recommendations to improve drone blast monitoring at Ravensworth, NSW.

DEFENCE

2017

Australian Federal Police canine monitoring program

Project manager, field work and reporting to determine the impact of aviation fuel on scent detection dogs' abilities and health, Sydney, NSW.

2017-2019

University of Sydney Commercial Developments and Industry Partnerships canine scent detection research program

Researcher developing machine-assisted learning scent detection devices to improve detection programs for narcotics and explosives.

2015-2016

Department of Defence Garden Island noise monitoring program

Noise monitoring to inform proposed developments at Garden Island, Sydney NSW.

2018

Darwin RAAF base dust complaint investigation

Review of air quality and meteorological conditions to inform investigation, Darwin, NT.

CREDENTIALS

AWARDS

Clean Air Society of Australian and New Zealand - Young Achiever award, 2015 for excelling in the field of air quality science.

MEMBERSHIPS

Clean Air Society of Australian and New Zealand

- Deputy Chair of Measurement Special Interest Group, 2015 - present
- Chair of the Emerging Professionals Branch, 2013 - 2017

TRAINING

- Leading People, 2019
- Rail Industry Worker - Australian Railway Association, 2018
- Machine Learning in Python - Sydney Informatics Hub, University of Sydney, 2018
- First aid training (cardiopulmonary resuscitation, basic emergency life support and first aid) - CBD College, 2018
- Next Horizon emerging leader program, 2018
- CALPUFF Modelling training course - Clean Air Society, 2017
- Sound propagation theory - Bruel and Kjaer, 2016
- Project Management training, 2015
- Winning Proposal Strategies - Shipley Asia Pacific, 2015
- Operate and maintain a 4WD - Getabout Training Services, 2015
- Emissions Reduction Fund auditor training - Clean Energy Regulator, March 2015.
- General Induction for Construction. WorkSafe, December 2014
- Ambient Air Quality Monitoring course - Clean Air Society, 2014
- NSW Energy Saving Scheme Auditing Training - IPART, 2013
- AUSPLUME Dispersion Modelling course - Clean Air Society, 2011
- Meteorology for Air Dispersion course - Clean Air Society, 2011

PUBLICATIONS

2018

Critical review of dog detection and influences of physiology, training, and analytical methodologies

Talanta, Volume 185, 499 – 512

Authors: Hayes J, McGreevy P, Forbes S, Laing G, Stuez R

2015

Development of Australia-Specific PM₁₀ Emission Factors for Coal Mines

ACARP, C22027, September 2015

Authors: Roddis D, Laing G, Boulter P, Cox J

2015

Mobile Sampling of Dust Emissions from Unsealed Roads

ACARP, C20023, January 2015

Authors: Cox J, Laing G

2015

Development of a novel sampling technique (T-REX) for the measurement of PM plumes, and application to coal mining operations

Clean Air Society Conference, Melbourne 2015

Authors: Laing G, Roddis D, Cox J, Boulter B

2015

Finalisation of Australian specific PM₁₀ emissions factors for coal mines

Clean Air Society Conference, Melbourne 2015

Authors: Roddis D, Laing G, Cox J, Boulter P

2013

Validation of low-cost ozone measurement instruments suitable for use in an air-quality monitoring network

Measurement Science and Technology. Volume 24, number 6.

Authors: Williams D E, Henshaw G S, Bart M, Laing G, Wagner J, Naisbitt S, Salmond J A

2013

Measuring variability of vehicle generated PM₁₀ concentrations on coal mine haul roads to determine best practice management control

Clean Air Society of Australia and New Zealand, Sydney 2013

Authors: Cox J, Laing G, Isley C, Watson J, Gale M

2012

The influence of vegetation on the horizontal and vertical distribution of pollutants in a street canyon

Science and Technology of the Total Environment, 443

Authors: Salmond J A, Williams D, Laing G, Kingham S, Dirks K, Longely, I, Henshaw G

2012

A low-cost continuous instrument for measuring roadside atmospheric aromatic hydrocarbons

Air and Waste Management Association - Air Quality Measurement Methods and Technology Conference, Durham, North Carolina, USA, 2012

Authors: Laing G, Henshaw G S, Prince B, Williams D, Salmond J, Bart M

2011

Measurement of atmospheric hydrocarbons in Auckland air using low cost temperature programmed desorption instruments and mobile SIFT-MS

Clean Air Society of Australia and New Zealand Conference, Auckland 2011

Authors: Henshaw G, Laing G, Prince B, Williams D

2011

Spatial and temporal variation of benzene, toluene, ethylbenzene and xylenes (BTEX) in an area of complex urban terrain

Meteorological Society of New Zealand, 2nd Annual conference proceedings, Nelson, 2011

Authors: Laing G, Salmond J, Henshaw G, Williams D

2011

Comparative measurements of urban atmospheric hydrocarbons using a simple temperature programmed desorption bed instrument and mobile SIFT-MS

USEPA National Air Quality Conference, San Diego 2011

Authors: Laing G, Williams D, Henshaw G, Prince B

2010

Low-cost ozone and nitrogen dioxide measurement instruments for monitoring air quality at outdoor networked sites

National Air Quality Conference, Raleigh, 2010

Authors: Henshaw G, Laing G, Salmond J A, Wagner J, Williams, D E

2009

Development of low-cost ozone and nitrogen dioxide measurement instruments suitable for use in an air quality monitoring network

2009 IEEE Sensors, 1099 – 1104

Authors: Williams, D E, Salmond, J, Yung Y F, Akaji J, Wright B, Wilson J, Henshaw G, Wells D B, Ding G, Wagner J, Laing G

APPENDIX C

INDEPENDENT AUDIT DECLARATION FORM

INDEPENDENT AUDIT DECLARATION FORM

Development Name	Woodlawn Bioreactor and Crisps Creek Intermodal Facility
Development Consent No.	Project Approval 10_0012 & Development Consent 31-02-99
Description of Development	Woodlawn Bioreactor and Crisps Creek Intermodal Facility
Development Address	Collector Road and Bungendore Road, Tarago
Operator	Veolia Environmental Services (Australia) Pty Ltd
Operator Address	PO BOX 171 GRANVILLE NSW 2142

Independent Audit

Title of Audit:	Woodlawn Bioreactor and Crisps Creek Intermodal Facility
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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 :

- 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
- 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 Lead Auditor: Emily Rowe

Signature:



Qualification: Exemplar Global Lead Auditor Accreditation No. 204997

Company: Ramboll Australia Pty Ltd

Company Address: PO Box 560, North Sydney NSW 2060

APPENDIX D

SITE INSPECTION PHOTOGRAPHS



Photo 1: First Flush System at Crisps Creek IMF, looking towards the north.



Photo 2: Forklift and chemical storage area adjacent to the site office at the Crisps Creek IMF, looking towards the south west.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318001112	Date: April 2021
Site: 619 Collector Road, Tarago NSW			
Client: Veolia Environmental Services (Australia) Pty Ltd			



Photo 3: Forklift unloading containers from a train at the Crisps Creek IMF. Looking towards the south.



Photo 4: Entrance sign at the Crisps Creek facility, located at the front of the site and looking towards the south.

Title: Independent Environmental Audit	Approved:	Project-No.:	Date:
Site: 619 Collector Road, Tarago NSW	VS	318001112	April 2021
Client: Veolia Environmental Services (Australia) Pty Ltd			



Photo 5: Dust deposition gauge, EPL Point 4, DG18, at the Crisps Creek IMF.



Photo 6: Eroded swale drain at the Crisps Creek IMF.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318001112	Date: April 2021
Site: 619 Collector Road, Tarago NSW			
Client: Veolia Environmental Services (Australia) Pty Ltd			



Photo 7: Refuelling area at the Bioreactor facility, located in the north eastern portion of the site, looking towards the west.



Photo 8: Overview of the Bioreactor, looking towards the south west.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318001112	Date: April 2021
Site: 619 Collector Road, Tarago NSW			
Client: Veolia Environmental Services (Australia) Pty Ltd			



Photo 9: Unloading of containers within the Bioreactor, looking towards the south west.



Photo 10: ED3 dam within the western portion of the site, looking towards the south.


Title: Independent Environmental Audit	Approved: VS	Project-No.: 318001112	Date: April 2021
Site: 619 Collector Road, Tarago NSW			
Client: Veolia Environmental Services (Australia) Pty Ltd			



Photo 11: ED1 dam within the western portion of the site, looking towards the north.



Photo 12: North western boundary of the bioreactor, looking towards the south west. Pipework running to the leachate dam.

Title: Independent Environmental Audit	Approved: VS	Project-No.: 318001112	Date: April 2021
Site: 619 Collector Road, Tarago NSW			
Client: Veolia Environmental Services (Australia) Pty Ltd			

APPENDIX E

DPIE APPROVAL OF AUDIT TEAM

VEOLIA ENVIRONMENTAL SERVICES (AUSTRALIA) PTY LTD
Attention: Mr Henry Gundry
Level 4/65 PIRRAMA ROAD
PYRMONT New South Wales 2009

05/02/2021

Dear Henry Gundry

Woodlawn Bioreactor Expansion Project (MP10_0012)
Audit Team Approval Request

I refer to your letter dated 3 February 2021, submitted to the Department Planning, Industry and Environment (Department), seeking the Secretary's endorsement for an audit team to undertake the Independent Environmental Audit (IEA) under Schedule 7 Condition 6 for the Woodlawn Bioreactor Expansion Project Approval 10_0012 (Consent).

The Department has reviewed the nominations and information you have provided and is satisfied that that Ramboll Australia Pty Ltd IEA team is suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment for the audit team to undertake the IEA and prepare the IEA Report.

In accordance with Condition Schedule 7 Condition 6 of MP10_0012 and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team:

- Ms Emily Rowe (Lead Auditor),
- Ms Vanessa White (Auditor),
- Mr Shaun Taylor (Traffic Expert),
- Ms Greer Laing (Odour Expert); and
- Ms Victoria Sedwick (Oversee and peer review the IEA).

Please ensure this correspondence is appended to the Independent Audit Report.

The IEA must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

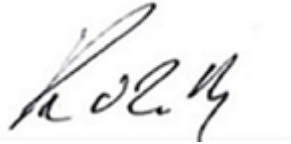
The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Prior to submitting the IEA report, it is recommended that you review the report to ensure it complies with the relevant approval condition and the Independent Audit Post Approval Requirements.

If you wish to discuss the matter further, please contact Jennifer Rowe on 0242471851.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. O'Reilly', enclosed within a thin black rectangular border.

Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary