
Odour Management Plan

Wetherill Park Resource Recovery Park

Document #. PLANS004 Addendum 1

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Version 2



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Appendix A– Weekly Odour Monitoring Form **Error! Bookmark not defined.**

1. Introduction

1.1. Overview

SUEZ Recycling and Recovery (SUEZ) Wetherill Park Resource Recovery Facility (WPRRF) is located at 20 Davis Road, Wetherill Park (the ‘site’). The site already operates as a resource recovery facility, receiving General Solid Waste (putrescible) and General Solid Waste. Following environmental and developmental assessment, WPRRF has received approval to increase its capacity of putrescible waste. SUEZ is required to prepare an Odour Management Plan (OMP) as part of approval conditions. As such, this document sets out procedures and measures to be undertaken to mitigate and manage odour impacts.

The OMP forms part of the WPRRF Operational Environmental Management Plan (OEMP) (Document # PLANS004).

1.2. Objective

The objective of the Odour Management Plan (OMP) is to ensure that SUEZ is operating the WPRRF in a manner that does not cause or permit the emission of any offensive odour beyond the boundary of the site.

Chapter 2 outlines requirements for the OMP. Amongst other things the OMP is to include a description of all potential odour sources and identify how odour control measures will be adopted to limit odour release.

Activities to manage potential odours from the operations will include identification of odour sources, odour monitoring, odour controls, complaint procedures, contingency planning and consultation.

The requirement is to ‘implement the plan’, which means that all operations must use the odour control facilities provided in design, and document the procedures to be followed in operations and maintenance to keep odour emissions within the levels necessary to meet the objective.

1.3. Description of Operations

WPRRF is licenced to receive and process up to 140,000 tonnes per annum (tpa) of general solid waste (putrescible), and 90,000 tonnes of general solid waste (non-putrescible) other limits N/A Additionally, general solid waste (putrescible) will not be stored on site for more than 24 hours from the time of receipt.

Development Consent hours

Operational Monday – Sunday 24 hours

WPRRF operates for general public in accordance with the hours listed below:

Sunday	22:00pm to Saturday 13:00pm
Sunday	06:00am to 13:00pm
Public Holidays	Closed

1.4. Receptor Locations

The identification of receptors was undertaken as part of the Odour Assessment that formed part of the Environmental Impact Assessment. Receptors are located around the WPRRF, primarily north and east of the facility, and are presented in **Table 1** and **Figure 1**. It is noted that the receptors are commercial properties, and residential properties are located further away (approximately 1.5 km).

Table 1: Receptor Locations

ID	Type	UTM Zone 56S	
		Easting (m)	Northing (m)
R1	Commercial	305,403	6,254,043
R2	Commercial	305,466	6,253,940
R3	Commercial	305,502	6,253,943
R4	Commercial	305,542	6,253,941
R5	Commercial	305,595	6,253,942
R6	Commercial	305,637	6,253,945
R7	Commercial	305,607	6,254,033

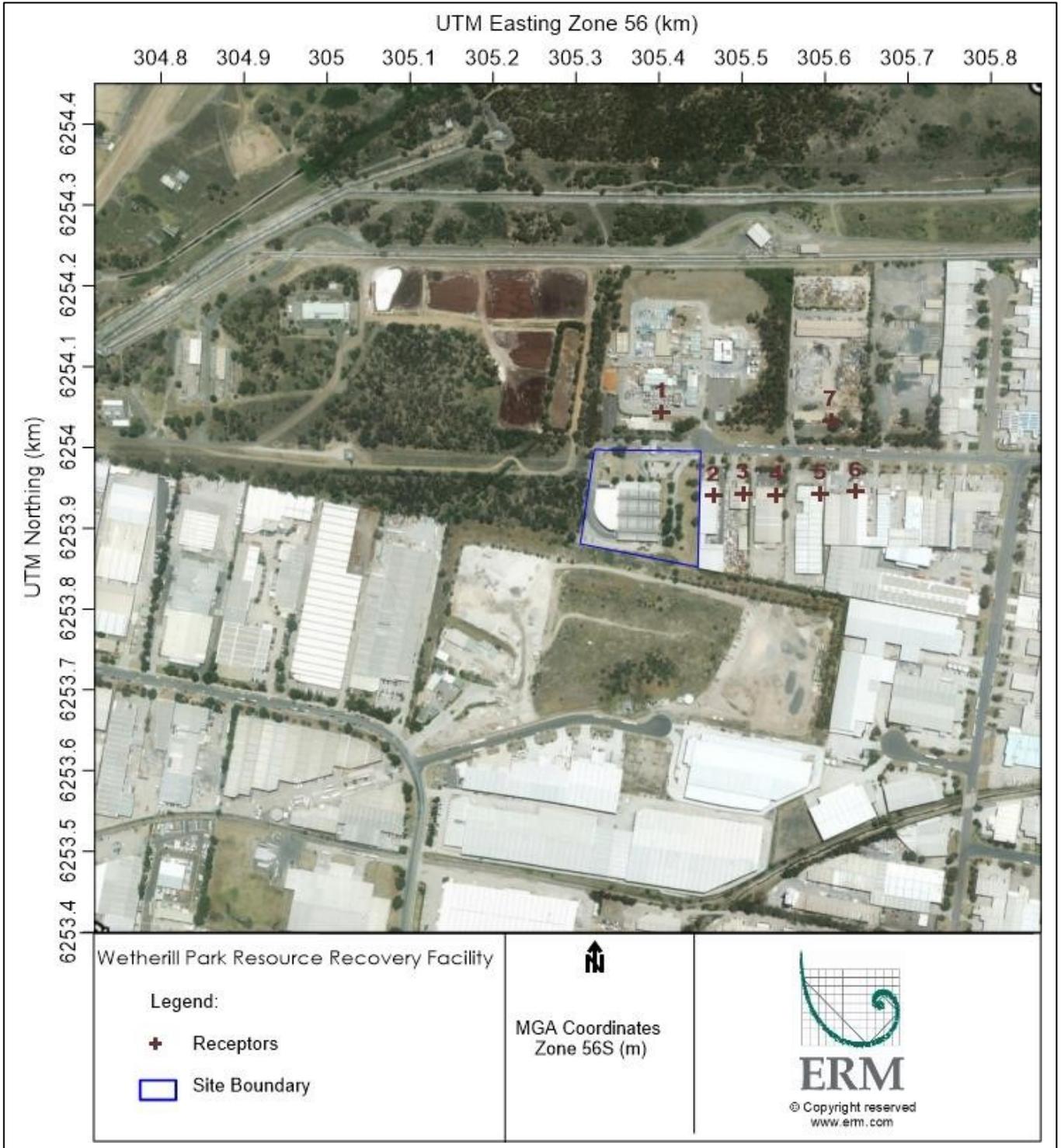


Figure 1: Location of Sensitive Receptors

2. Odour Management Plan Compliance Requirements

An OMP is required for the WPRRF operations as part of site Development Consent conditions and the Environment Protection Licence. The OMP forms part of the OEMP, and has been prepared in accordance with the conditions as outlined below.

2.1. Development Consent

An Odour Management Plan is required as part of the site Development Consent SSD 7267 (the 'Development Consent'), dated 11 September 2017 and modified 4 April 2019. Relevant Development Consent conditions are outlined in Table 2.

Table 2: Development Consent Conditions

Condition	
Odour Management	
B7	The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).
B8	Prior to the commencement of expanded operations and to the satisfaction of the EPA, the Applicant must: <ul style="list-style-type: none"> (a) install deodorising sprays over the vehicle entrance and exits; and (b) apply a sealant to the concrete working floor in the receival hall to prevent the absorption of leachate into the tipping floor.
B9	During operations, the Applicant must: <ul style="list-style-type: none"> (a) conduct a weekly wash-down of any tipping area and surge pit contaminated with putrescible waste; (b) conduct annual wash down of interior walls and surfaces; (c) ensure that all trucks and trailers parked at the site are cleaned fortnightly; and (d) ensure that deodorising sprays are operational at all times.
Odour Management Plan	
B14	Prior to the commencement of expanded operations, the Applicant must prepare an Odour Management Plan (OMP) to the satisfaction of the EPA and the Secretary. The OMP must form part of the OEMP required by Condition C4 and be prepared in accordance with C6. The OMP must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA; (b) describe the measures that would be implemented on-site to ensure: <ul style="list-style-type: none"> i. odour emissions are minimised, including details of the air pollution control devices and all other operational odour mitigation measures; ii. compliance with the relevant conditions of this consent; iii. compliance if adverse odour emissions occur or appear likely to occur; (c) include an ongoing monitoring program; (d) include well defined triggers for the deployment of odour mitigation and contingency measures; and (e) include a protocol which includes contingency measures for system failures.
B15	The Applicant shall ensure the OMP (as required and approved by the Secretary from time-to-time) is implemented for the operational life of the Development.
Odour Audit	
B16	The Applicant must carry out an Odour Audit of the Development no later than six months after the commencement of expanded operations. Division 2B of Part 6 of the EP&A Act applies to this audit which is for the purpose of validating the odour data used in the EIS. The audit must:

Condition	
	(a) be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Secretary; (b) audit the Development in full operation; (c) include a summary of odour complaints and any actions that were carried out to address the complaints; (d) validate the Development against odour impact predictions in the EIS and the RTS; (e) review the design and management practices in the Development against industry best practice for odour management; (f) identify suitable odour mitigation options and controls, including but necessarily limited to: <ul style="list-style-type: none"> i. mechanical ventilation; ii. operation of the building under negative pressure to minimise fugitive emissions; and iii. odour capture and control options. (g) include an action plan that identifies and prioritises any odour mitigation measures that may be necessary to reduce odour emissions. <i>Note: The Odour Audit may be prepared so that it addresses the requirements of this consent and the EPL for the Development.</i>
B17	Within two months of commissioning of the Odour Audit required by Condition B16, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the Odour Audit report to the satisfaction of the EPA and Secretary, together with the Applicant’s response to any recommendations contained in the Odour Audit report.
B18	The Applicant must comply with any reasonable requirement/s of the Secretary arising from the Department’s assessment of the Odour Audit report required by Condition B17.

2.2. Environment Protection Licence

The operation of the WPRRF is also subject to conditions of Environment Protection Licence 4548 (‘EPL’). Specific conditions relating to odour are noted in **Table 3**. Table 3: Environment Protection Licence Conditions

Condition	
L3	Potentially offensive odour
L3.1	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.	

2.3. Odour Performance Criteria

Odour modelling and assessment undertaken as part of the Environmental Impact Assessment (Pacific Environment, 2016). From assessment of relevant regulatory requirements, it was determined that, based on the population density of the surrounding area, the impact assessment criteria of 2 OU (at the 99th percentile; EPA, 2005) is applicable for the site. It is predicted that operations at WPRRF will be able to meet the 2 OU assessment criteria at the closest commercial receptor locations identified in **Figure 1**.

3. Odour Management

Odour management will be undertaken to fulfil approval requirements, as well as meet SUEZ Odour Management procedure (Document # SOP065). Odour patrol will be completed in Intellex.

3.1. Potential Odour Sources

Following a detailed review of the WPRRF site operations SUEZ has identified a number of potential odour sources. The potential impacts of these odour sources have been quantified using the SUEZ internal risk management procedure. The potential odour sources have been ranked according to their inherent risk rating and is reflected in the list below:

1. Waste receival and storage area, including:
 - Tipping floor for processing putrescible waste;
 - Tipping floor for processing non-putrescible waste;
 - Including small vehicle unloading area
 - Including commercial vehicle unloading area
2. Waste Pit;
 - Waste pit for processing putrescible waste;
 - Waste pit for processing non-putrescible waste;
3. Vehicles entering/exiting the site; and
4. Leachate containment tank and stormwater pits.

3.2. Controls of Potential Odour Sources

As part of the risk management procedure controls have been identified and implemented to ensure that all potential odour sources are controlled and do not impact on neighbouring properties. The controls have been broken down into areas of potential odours sources which are listed below.

3.2.1. Waste Receival and Storage Area

- Waste received must comply with allowed waste listed in Condition L2.1 of Environment Protection Licence 4548. Waste type will be monitored by the weighbridge staff and site operators using the waste classification guidelines.
- Waste type will be monitored by the weighbridge staff and site operators using the waste classification guidelines.
- Retrieved Waste will be separated into marked zones by customers and operators. The waste will then be processed.
- Haz chem items are stored within IBCs, bunds, cage or drums. These are stored and clearly labelled while waiting collection.
- If odorous waste has been identified, it must be directed to the appropriate area, be stored within the building at all times, and processed as soon as possible.
- Equipment and work areas are regularly washed. In particular:
 - conduct a weekly wash-down of any tipping area and surge pit contaminated with putrescible waste;
 - conduct annual wash down of interior walls and surfaces; and
 - ensure that all trucks and trailers parked at the site are cleaned fortnightly;
- Litter patrols are conducted on a regular basis.
- Continue existing operation of the Deodoriser Dust Suppression System, installed in the roof over the waste surge pit and over all entry ways that contains odour suppressing compounds in the ultra-fine water fog.
- Waste delivery trucks entering the terminal would be required to be fully enclosed or covered.
- All waste received is to be delivered within the confines on the waste receivables hall in order to control the potential for odour release.
- Receival hall roller doors must be closed when site is not in operation.
- General solid waste (putrescible) is removed from site within a 24 hour period.

3.2.2. Waste Pit

- General Solid Waste (Putrescible) and General Solid Waste non-putrescible waste stream will be kept separate.
- If odorous waste has been identified, it must be directed to the appropriate area, be stored within the building at all times, and processed as soon as possible.
- The amount of General Solid Waste (putrescible) on-site within the receival hall will be minimised as much as reasonably practicable.
- General solid waste (putrescible) is removed from site within a 24 hour period.
- Wastes are transported to approved licenced disposal facilities Installed
- deodouriser suppression system above waste pit

3.2.3. Vehicles Entering / Exiting the Site

- If odorous waste has been identified, it must be directed to the appropriate area, be stored within the building at all times, and processed as soon as possible.
- Traffic management procedures to co-ordinate the delivery schedule and avoid a queue of the incoming or outgoing trucks for extended periods of time.
- Spill management procedures to include immediate cleaning up of any spill/leakage from incoming and outgoing trucks.
- Installed of deodouriser suppression system above vehicle entry and exit doors

3.2.4. Leachate Containment Tank and Stormwater Pits

- All liquid that comes into contact with waste is considered leachate.
- Routine site inspection will be conducted to observe wastewater treatment is operational, and promptly follow-up with any issues as per the Contingency Plan in **Section 5**.
- Routine site walks will be conducted to ensure stormwater drains are free of debris and/or waste. Debris/waste will be cleared from stormwater drains as soon as practicable.
- Leachate will be treated in the wastewater treatment plant on site, in accordance with the Trade Waste Agreement 7976 and the OEMP.
- SUEZ arranges collection and analysis of water sampling as per Trade Waste Agreement 7976 with the schedule of 90 days

3.2.5. General

- Ensure all machinery and equipment is maintained in accordance with manufacturer's recommendations, and keep maintenance records;
- An odour complaint database Intellex will be maintained. Where a complaint in relation to odour is received, immediately investigate any unusual odour sources (including spill or leakage in the traffic areas) within the site boundary and take appropriate action to eliminate these. Offsite odours not generated by the SUEZ facility will also be noted in Intellex inspections
- Operational practices and management plans will be reviewed regularly as outlined in **Section 6** and
- Provide relevant training to staff including:

- Site induction (including OEMP, OMP, TMP, ERP (PIRMP) and complaints procedures);
- Waste handling and transfer training;
- Machinery operation training;
- Spill response training
- Deodoriser Dust Suppression System training; and
- Toolbox meetings to discuss safety and/or compliance, conducted at least once a month.

3.2.6. Odour Monitoring Program

Weekly odour monitoring is required to ensure that all controls are effective and will include:

- The odour monitoring will be conducted as required.
- The Environmental Advisor or nominated person will conduct the odour monitoring to check for any unusual level of odour around the site.
- Specific locations to be visited during the odour monitoring is outlined within the Weekly Odour Monitoring checklist.
- The odour monitoring will include review of the controls on potential odour sources and the efficiency of the odour controls in place.
- If an unusual level of odour is detected the Site Manager should be notified so that the source can be determined and repaired.
- External odour monitoring to be completed proactively, during adverse weather conditions or in response to an odour complaint

Incident Management and Engagement

4. Environmental Incident Management and Community Engagement

In accordance with the OEMP, all environmental incidents are to be recorded in accordance with the Incident Reporting and Corrective Action Procedure. Environmental complaints are handled in accordance with the Environmental Complaints Management Standard Operations Procedure (SOP). All environmental incidents and complaints are recorded in Intellex

The EPA Licence also has specific requirements relating to the notification of environmental harm. This is outlined in **Table 4**.

Table 4: Environment Protection Licence Notification of Environmental Harm Conditions

Condition	
R2	Notification of environmental harm
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.
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.
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.	

4.1. Complaints Management

A Complaint and Incident Register (the 'Register') is to be maintained at the site by SUEZ and published on the SUEZ website in compliance with C11 of the consent SSD 7267. The Register will be maintained throughout the operational life of the site and will also be utilised as a tool to improve the management of the site.

A free call telephone line through SUEZ's Customer Service department operates 24 hours a day 7 days per week. Ph: 13 13 35 (COC 153). The details of all complaints received and actions taken in response to the complaints are kept on the SUEZ database through the Intellex system. Complaints received via the hotline are investigated and responded to within the allocated time frame. The information to be recorded as part of the investigation includes;

- Name of complainant;
- Contact details of complainant (e.g. telephone, email, postal address);
- Location, date and time at which alleged environmental impact occurred (street address);
- A general description of the nature of the environmental impact, including the following where applicable:
 - Duration and any pattern;
 - Character of odour;
 - Whether there were any adverse health effects related to the environmental impact;
 - What response has been requested or expected by complainant from SUEZ (e.g. a return phone call);
 - The likely source(s) of the cause of the complaint; and
- What the weather conditions (e.g. wind speed, wind direction, temperature) were like at the time of the alleged environmental impact.

All records of complaints are kept for a minimum of 4 years after the complaint is made and can be produced upon request.

5. Contingency Plan

In the event of an unpredicted event or incident that causes or has the potential to cause odour impacts beyond the boundaries of the site, the contingency plan, provided in **Table 5** should be implemented.

Table 5: Contingency Plan

Ref No.	Description	Operational Control(s)	Risk Rating	Asset Management Control(s)	Responsibility	Measure of Success
1.	Significant Rain Event – Storm or Severe Forecast	<p>Upon alert from the Bureau of Meteorology, review the site to ensure it is prepared for the rain event including:</p> <p>Ensure leachate tank has capacity;</p> <p>Ensure wastewater treatment plant is operational;</p> <p>Ensure stormwater tank has capacity, and keystone valve is operational;</p> <p>Ensure stormwater drains are free of debris;</p> <p>Ensure all doors are operational and closed.</p>	15 Medium		Site Manager / Site Supervisor / Site Office Staff	<p>Operational readiness plans in place according to BOM forecast.</p> <p>Operational Aerators.</p>

Contingency Plan



2.	Waste Reival doors damaged and/or cannot close	Ensure that the main waste reival doors are always operational and closed outside of facility operational hours. Damaged doors are repaired within 72 hours where practicable Deodouriser installed above doorways	11 Medium	Spare door parts (eg actuator motors, runners, controls) to be held by supplier to ensure quick supply and repair.	Site Manager / Site Supervisor / Site Office Staff / Site Staff	Door repair repaired within 72 hours where practicable
Ref No.	Description	Operational Control(s)	Risk Rating	Asset Management Control(s)	Responsibility	Measure of Success
		Remaining functional doors can be closed FORM026.4 – WPRRF Weekly Odour Monitoring				
3.	Deodoriser Dust Suppression System Failure	Contain all odours within the facility. Remove faulty component and repair or replace with spare parts. Waste removal from site as a priority	11 Medium	Ensure spare parts are in stock and labelled as per manufacturer's stocking levels. Ensure regular maintenance of system.	Site Manager / Site Supervisor / Site Staff	Immediate identification of failed component, repair undertaken with onsite stock (no downtime).

Contingency Plan



4.	Odour Complaint received	<p>If an odour complaint is received from the community, EPA or Council, follow the Suez Complaints procedure.</p> <p>Intelex Odour Monitoring Weather station on site</p>	6 Low		Site Manager / Site Supervisor / Site Office Staff / Site Staff	Compliance with complaints procedure.
5.	Leachate containment tank, stormwater tank and/or wastewater treatment plan faulty	<p>Remove faulty component and repair or replace with spare parts.</p> <p>Activate isolation valve Arrange pit pump outs</p>	11 Medium	<p>Ensure spare parts/chemicals are in stock and labelled as per manufacturer's stocking levels.</p> <p>Ensure regular maintenance is undertaken.</p>	Site Manager / Site Supervisor / Site Staff	Immediate identification of failed component, repair undertaken with onsite stock (no downtime).
6.	Accidental Waste Deposited/Spilled Outside WPRRF Building	<p>Immediately notify Site Manager and proceed to contain the waste and relocate to within the building.</p> <p>Directions given to customer at the weighbridge on where to tip on site</p>	6 Low		Site Manager / Site Supervisor / Site Office Staff / Site Staff	Immediate identification of waste and measures to contain waste.
7.	Excess waste received at the facility and processing capacity is exceeded and storage is not available	<p>Divert waste loads to an alternate facility or send to suitably licensed landfill in line with Business Continuity Plan (PLANS006)</p> <p>Monthly reporting to EPA - WARRP</p>	13 Medium	Review process performance and planned production weekly	Site Manager / Site Supervisor	Monthly processing capacity matches or exceeds incoming.

Contingency Plan



8.	Electrical Power Supply Failure	<p>Contain all odours within the facility.</p> <p>Upon power supply restoration check that all odour control plant is operating. Some may need to be reset.</p> <p>Underground utilities on site</p> <p>Access to back up generator for extended power outage</p> <p>Facility doors have manual override</p>	6 Low		Site Manager / Site Supervisor / Site Office Staff / Site Staff	Facility doors closed during power failure
9.	Site Machinery Failure (Including Dozer, Excavator, Front End Loader, Bobcat, Forklift)	All machines are on a lease arrangement. If downtime is longer than 24 hours, the supplier is required to provide a replacement.	6 Low	Ensure regular maintenance as per manufacturer's requirements.	Site Manager / Site Supervisor / Site Staff	Machine replacement within 48 hours, if required.

Contingency Plan



10.	Truck Failure, unable to transport material	<p>Hire a replacement truck, or schedule additional walking floor loads. With remaining truck prioritise the transportation of material outside to reduce odour profile.</p> <p>Material must be covered as per licence conditions.</p> <p>Waste diversion in line with Business Continuity Plan (PLANS006)</p> <p>Enough trucks in fleet to accommodate out of service vehicles</p>	11 Medium		Site Manager / Site Supervisor / Site Staff	<p>Timely replacement of truck.</p> <p>No material stored in internal bunkers.</p>
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Responsibilities

6. Review

6.1. Staff Training

All staff will be trained on operation of machinery and equipment, SUEZ procedures and responsibilities outlined in the OEMP, OMP, TMP, ERP (PIRMP). Updated training will be provided if/when:

- New/upgraded machinery or equipment is provided; and Changes
- in SUEZ procedures, processes and/or standards.

6.2. OMP Review

The OMP will be reviewed every two years, and as relevant if there are any changes to the operations. This is to ensure that best practice odour management practices have been implemented, and to make improvements to the OMP, where practicable.

6.3. Initial Odour Audit

In accordance with Development Consent conditions, the first Odour Audit will be undertaken no later than six months after the commencement of expanded operations. The Odour Audit will:

- (a) be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Secretary;
- (b) audit the Development in full operation;
- (c) include a summary of odour complaints and any actions that were carried out to address the complaints;
- (d) validate the Development against odour impact predictions in the EIS and the RTS;
- (e) review the design and management practices in the Development against industry best practice for odour management;
- (f) identify suitable odour mitigation options and controls, including but necessarily limited to:
 - i. mechanical ventilation;
 - ii. operation of the building under negative pressure to minimise fugitive emissions; and
 - iii. odour capture and control options.
- (g) include an action plan that identifies and prioritises any odour mitigation measures that may be necessary to reduce odour emissions.

6.4. Ongoing Odour Audits

Following the first Odour Audit (refer **Section 6.3**), subsequent Odour Audits will be conducted by SUEZ personnel on an annual basis. Independent Odour Audits undertaken by suitably qualified, experienced and independent person(s) will be conducted on an as needs basis.

Responsibilities

7. Responsibilities

7.1. Site Manager

The site manager has responsibility for:

- Implementation of this plan;
- Conforming with the plan;
- Training of staff in the plan;
- Communication of the plan ;
- Reporting of incidents; and
- Ensuring corrective actions are taken.

7.2. EQS and Compliance Personnel

Environmental, Quality and Safety (EQS) and Compliance Personnel have responsibility for:

- Carrying out control measures within their area of responsibility;
- Participating in and providing training;
- Ensuring site managers and supervisors are aware of their responsibilities under the SUEZ Odour Management procedure (Document # SOP065);

7.3. Site Supervisor

The site supervisor has responsibility for:

- Ensuring adherence to this plan;
- Conforming with the site plan;
- Reporting of incidents; and
- Implementing corrective actions.

7.4. Site Office Staff

Site office staff are responsible for:

- Informing the site manager/supervisor of non-conformity to the plan; and Reporting
- of incidents.

7.5. Site Staff

All site staff are responsible for:

- Ensuring adherence to the plan;
- Conforming with site rules;
- Reporting of maintenance defects; and Reporting
- of incidents.

Document Control

8. Related Documents

DOCUMENT NAME	REFERENCE
Operational Traffic Management Plan (OTMP)	PLANS002
Emergency Response Plan (ERP), including Pollution Incident Response Plan (PIRMP)	PLANS003
Operational Environmental Management Plan	PLANS004
Spill Response	SOP007
Odour Management	SOP065
Inspection Checklist	

9. Review and Document Control

VERSION	CHANGE	REVIEWED	AUTHORISED	DATE ISSUED
1	Initial issue	Site Manager	Nat EQS Adviser	1 Nov 2019
2	Review and update reference to Intalex, Environmental Advisor, Expanded operations	Environmental Manager NSW	Nat S&W Adviser	22 September 2021

Appendices

10. References

- EPA (2005), "Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales". NSW Department of Environment & Conservation. Sydney.
- Pacific Environment (2016), "Wetherill Park Resource Recovery Facility Upgrade – Odour Assessment".
- Consent to Discharge Industrial Trade Wastewater between Sydney Water Corporation and SUEZ Recycling & Recovery Pty Ltd; Consent No 7976 (07//06/2017)
- Environmental Protection Licence 4548; Licence version date 4-Aug-2015