



Wetherill Park Waste Transfer Station | State Significant Development

INDEPENDENT ENVIRONMENTAL AUDIT

Prepared for SUEZ Recycling & Recovery Pty Ltd | 30 November 2020



Wetherill Park Waste Transfer Station

STATE SIGNIFICANT DEVELOPMENT | INDEPENDENT ENVIRONMENTAL AUDIT

Prepared for SUEZ Recycling & Recovery Pty Ltd
30 November 2020

PR145

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Date	30 November 2020	30 November 2020

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Revision	Date	Description	Prepared by	Reviewed by
0	12 November 2020	For Suez review	Element Environment	SUEZ Recycling & Recovery Pty Ltd
1	30 November 2020	For submission to DPIE	Element Environment	SUEZ Recycling & Recovery Pty Ltd

Audit declaration

Project name	Wetherill Park Waste Transfer Station
Consent number	SSD 7267
Description of project	Alteration and additions to and an increase in the processing capacity of an existing waste transfer station to 230,000 tonnes per annum (tpa) of waste including 140,000 tpa of general solid waste (putrescible) and 90,000 tpa of general solid waste (non-putrescible).
Project address	20 Davis Road, Wetherill Park
Proponent	Suez Recycling & Recovery Pty Ltd
Title of audit	Wetherill Park Waste Transfer Station Independent Environment Audit

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

1. The audit has been undertaken in accordance with relevant condition(s) of consent;
2. The findings of the audit are reported truthfully, accurately and completely;
3. I have exercised due diligence and professional judgement in conducting the audit;
4. I have acted professionally, objectively and in an unbiased manner;
5. 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;
6. 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;
7. 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
8. 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.

Name of Auditor	Darren Green
Signature	
Company	Element Environment Pty Ltd
Date	30 November 2020

Contents

EXECUTIVE SUMMARY	VII
1 INTRODUCTION	3
1.1 Background	3
1.2 Audit team	3
1.3 Audit objectives	4
1.4 Audit scope	4
1.5 Audit period	4
2 AUDIT METHODOLOGY	9
2.1 Development of audit scope	9
2.1.1 Complaints or incidents	9
2.1.2 Consultation	9
2.2 Compliance evaluation	9
2.3 Opening meeting	10
2.4 Site interviews	10
2.5 Site inspection	10
2.6 Document and information review	10
2.7 Closing meeting	12
3 AUDIT FINDINGS	15
3.1 Compliance performance	15
3.2 Summary of agency notices, orders, penalty notices or prosecutions	15
3.3 Audit non-compliances	15
3.4 Previous audit recommendations	16
3.5 EMP, subplans and compliance documents	16
3.6 Environmental performance	16
3.7 Consultation outcomes	17
3.8 Complaints	17
3.9 Incidents	18
3.10 Site inspection	18
3.11 Site interviews	18
3.12 Previous annual review recommendations	18
3.13 Key strengths	18
4 RECOMMENDATIONS	21
4.1 Non-compliances	21
4.2 Opportunities for improvement	21

Tables

Table 2.1: Compliance status descriptors in this audit	9
Table 2.2: Documents and information reviewed	10
Table 3.1: Audit non-compliance findings.....	15
Table 3.2: Environmental performance in key risk areas.....	16

Table 4.1: Non-compliance recommendations21

Figures

Figure 1.1: Site location.....5

Charts

Chart 3.1: Compliance status breakdown by descriptors15

Appendices

APPENDIX A AUDIT CRITERIA 23

APPENDIX B PLANNING SECRETARY AUDIT TEAM AGREEMENT 79

APPENDIX C CONSULTATION 83

APPENDIX D SITE PHOTOGRAPHS 86

EXECUTIVE SUMMARY

Conditions of Approval (CoA) issued for State significant development 7267 (SSD 7267) on 11 September 2017 require an independent environmental audit to be completed within one year of commencing operation, and every three years thereafter.

This independent environmental audit report satisfies that requirement and has been carried out in accordance with:

- condition C12 of SSD 7267;
- the audit methodology recommended in *Independent Audit Post Approval Requirements* (Department of Planning, Industry and Environment, May 2020); and
- the processes and practice procedures identified in AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems.

The audit report documents the outcomes of the review of compliance undertaken by Darren Green, Lead Auditor, Element Environment Pty Ltd (Element).

The audit methodology included:

- pre-site audit documentation review;
- opening meeting;
- site inspection;
- closing meeting; and
- audit report finalisation and submission.

Findings of the audit are summarised and discussed in the body of this report, with a detailed record of audit findings included in Appendix A and a photo log in Appendix D.

Consultation with Fairfield City Council (FCC) and NSW Environment Protection Authority (EPA) was undertaken. No adjustments were made to the audit scope and/or audit table as neither FCC nor the EPA responded.

The audit has found that the site was generally compliant and being managed in accordance with the requirements of the SSD 7267. Of the 98 CoA's relevant to the audit, the following findings of compliance were made:

- 65 compliant;
- 7 non-compliant; and
- 26 not triggered.

The root cause for most of the non-compliant CoA's appears to be a misunderstanding of the date from when SSD 7267 is applicable. Two non-compliances are however not related to the commencement date of SSD 7267 and are summarised below:

- CoA B5 pertains to a first flush detention tank, however it was confirmed during site interviews that the existing stormwater system does not include a first flush detention tank.
- CoA B42 requires the covering of waste loads, unless within the waste transfer station building, and always keeping the site clean and tidy. During the site inspection waste was being delivered outside the enclosed building and paper waste had been blown outside the property boundary.

At all times during the audit, site representatives were helpful, had a strong understanding of their environmental commitments and obligations, and forthcoming with all requested information.

CHAPTER 1

INTRODUCTION

1 INTRODUCTION

1.1 Background

Wetherill Park Waste Transfer Station (WTS) (the site) is located at 20 Davis Road, Wetherill Park in the Fairfield local government area (LGA) and is approximately 30 kilometres (km) west of Sydney central business district (refer Figure 1.1). The site covers approximately 2 hectares (ha) of industrial zoned land in the Wetherill Park Industrial Park. Industrial receivers are located immediately adjacent to the site and the nearest sensitive residential receivers are in Horsley Park, approximately 1.5 km away.

SUEZ has been operating the WTS at this site since 1989 under several development consents approved by Fairfield City Council (FCC). In 2015, SUEZ submitted a development application to increase the overall processing capacity from 100,000 tonnes per annum (tpa) to 230,000 tpa. The application included some modifications and expansion of the site to facilitate the increase in processing capacity. The application was considered State significant development (SSD) because the site processed more than 100,000 tpa of waste per clause 23(2) of Schedule 1 in State Environmental Planning Policy (State and Regional Development) 2011.

The development application was referred to the NSW Planning Assessment Commission (PAC) on 29 August 2017. On 11 September 2017, the PAC approved the development application subject to conditions set out in the development consent (SSD 7267).

It is a requirement of SSD 7267 that SUEZ surrender all historical development consents' and proceed to operate in accordance with SSD 7267. The purpose of surrendering the historical development consents' is to mitigate potential conflicts with SSD 7267.

It is also a requirement of SSD 7267 that within one year of commencing operations, and every three years thereafter, SUEZ must commission and pay for an independent environmental audit. The purpose of the audit is to ascertain the environmental performance of the development and the adequacy of its strategies, plans and programs.

Development consent for SSD 7267 was granted in September 2017, prior to the NSW Department of Planning, Industry and Environment (DPIE) releasing the *Independent Audit Post-Approval Requirements* (Independent Audit PAR) in December 2018 (updated May 2020). SUEZ has decided to audit the project in accordance with the Independent Audit PAR (May 2020).

1.2 Audit team

The following audit team has been agreed by DPIE as suitably qualified, experienced and independent to undertake this audit (refer Appendix B):

- Peer reviewer and audit challenger - Neville Hattingh; and
- Lead auditor - Darren Green.

Neville has reviewed audit findings, challenged declarations of compliance where necessary and ensured quality and due diligence protocols were implemented during the audit.

Darren undertook the audit and documentary review, determined compliance and prepared the audit report.

Both Neville and Darren are certified as Lead Environmental Auditors and Neville is a member of the Environment Institute of Australia and New Zealand (MEIANZ).

Neville Hattingh

Neville has over 17 years' experience in environmental impact assessment, environmental planning and environmental management, across the transport infrastructure, resources, water, waste and property sectors. Neville has extensive international and local experience where he has been involved in the project management and coordination of more than 300 environmental approvals and the multidisciplinary professionals and specialists involved therein.

Darren Green

Darren has over 12 years' experience in environmental impact assessment, environmental planning and environmental management, across the transport, infrastructure, water, extractive, construction and waste sectors. Darren holds a Lead Auditor certification issued by Exemplar Global.

1.3 Audit objectives

The objective of this audit is to obtain an independent and unbiased assessment of the environmental performance and compliance status of the development against the audit criteria.

1.4 Audit scope

Condition C12 of SSD 7267 requires the scope of the audit to:

1. Be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
2. Include consultation with the relevant agencies;
3. Assess the environmental performance of the development and assess whether it is complying with the requirements in the consent, and any other approvals, relevant EPL's (including any assessment, plan or program required under these approvals);
4. Review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and
5. Recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these consents

1.5 Audit period

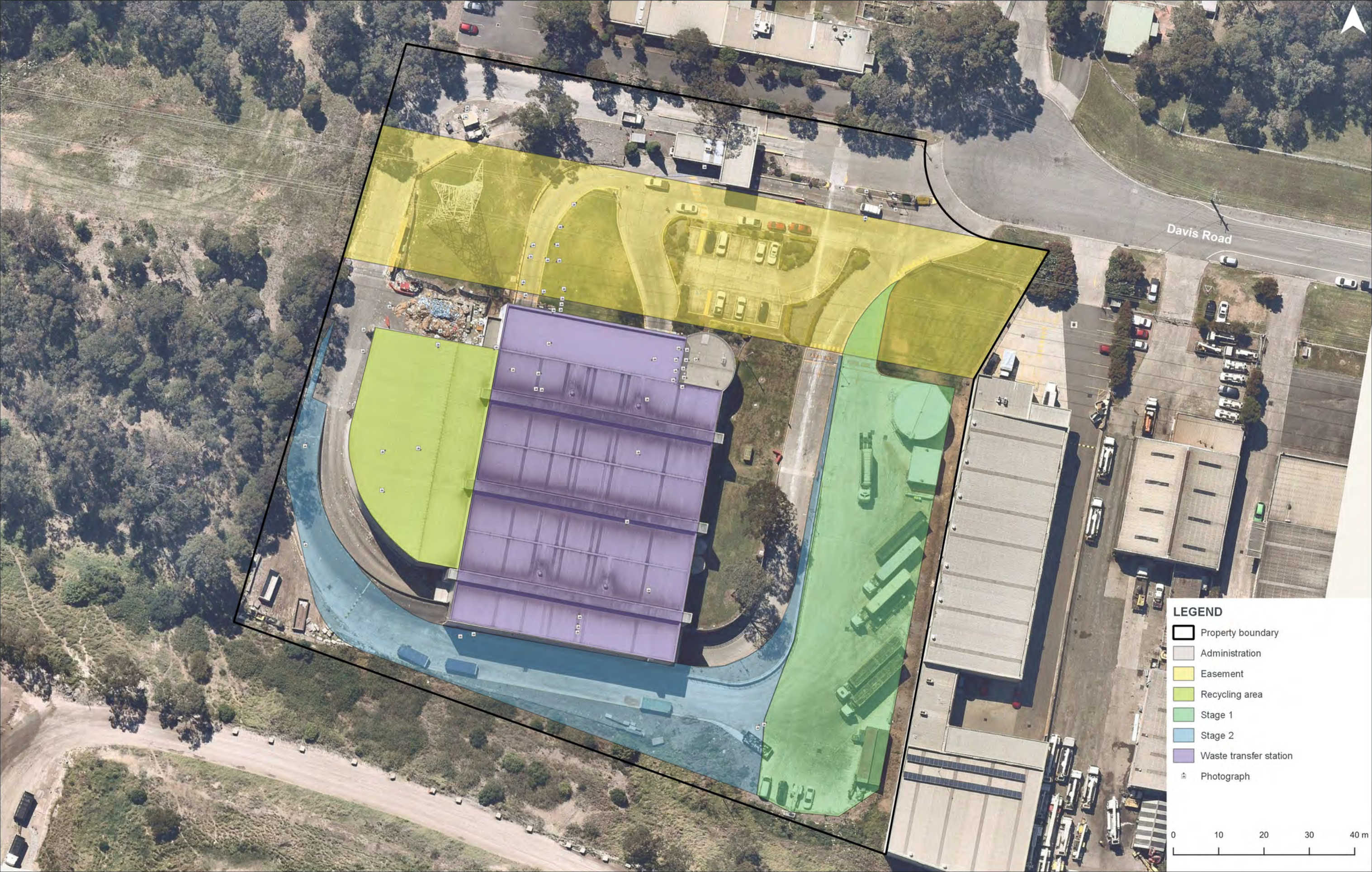
Condition C12 of SSD 7267 stipulates the following audit frequency:

- Within one year of commencement of operations; and
- Every three years thereafter;

Operations under SSD 7267 commenced on 9 December 2019, therefore the audit period for this report is December 2019 to October 2020.

Figure 1.1
Site location

WETHERILL PARK WASTE TRANSFER STATION
INDEPENDENT ENVIRONMENT AUDIT



CHAPTER 2

AUDIT METHODOLOGY

2 AUDIT METHODOLOGY

2.1 Development of audit scope

The scope of the audit has been developed with reference to Condition C12 of SSD 7267, any documented complaints or incidents and consultation with identified stakeholders.

2.1.1 Complaints or incidents

Only one complaint has been recorded during the audit period, on 28 August 2020, relating to waste being dragged by departing delivery vehicles on to the public road. This complaint was investigated and closed out on 27 September 2020.

No environmental incidents were recorded during the audit period.

No amendment was made to the audit criteria in Appendix A on the basis the audit criteria satisfactorily addressed the area of concern.

2.1.2 Consultation

FCC and the EPA were notified of the independent environment audit being undertaken and were requested to provide any complaints, incidents or any issues they would like addressed (refer Appendix C). Neither FCC nor the EPA responded to the correspondence.

No amendment was made to the audit criteria in Appendix A as FCC and EPA did not respond to the invitation to comment.

2.2 Compliance evaluation

The compliance status descriptors applied to this audit are consistent with *Independent Audit Post Approval Requirements* (DPIE, May 2020) and are reproduced in Table 2.1.

Table 2.1: Compliance status descriptors in this audit

Descriptor	Definition
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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

The evaluation of compliance must be based on verifiable evidence. Verifiable evidence includes (but is not limited to):

1. Review of relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author);
2. Interviews of relevant site personnel;
3. Photographs (including the date the photograph was taken);
4. Aerial imagery and geographic information system (GIS) figures;
5. Site inspections of relevant locations, activities and processes;
6. Monitoring data and analysis including the period covered by the monitoring data; and
7. Delivery records, invoices and receipts including the record date and reference number.

The evidence used to verify the compliance status is documented in Appendix A, along with any relevant observations and recommendations, including any opportunities for improvement.

2.3 Opening meeting

The audit commenced with an online opening meeting hosted by Element on 1 October 2020. The purpose of the opening meeting was to confirm the scope of the audit, the audit methodology and agree on the people and representatives who will be involved in the audit. The meeting agenda included:

- Introduction and welcome;
- Audit objectives;
- Scope of the audit;
- Confirmation of audit criteria;
- Audit methodology;
- Questions / other; and
- Thanks and meeting closure.

Attendees of the opening meeting included:

- Darren Green, Lead auditor, Element;
- Neville Hattingh, Technical and peer review; Element;
- Kelly Gee, Project Manager, State Strategy & Program, Suez; and
- Mgahl Eather, Environment & Sustainability Business Partner, Suez.

During the opening meeting the site inspection was agreed to be undertaken on 6 October 2020.

2.4 Site interviews

Site interviews were conducted on 6 October 2020. Site interviews were conducted with the project management team within the site office environment and during site inspection. Interviewees included:

- Kelly Gee, Project Manager, State Strategy & Program, Suez;
- Mgahl Eather, Environment & Sustainability Business Partner, Suez; and
- Aaron Svensson, Site Manager, Wetherill Park, Suez.

2.5 Site inspection

An inspection of the entire development site was carried out on 6 October 2020. The lead auditor was accompanied by Kelly Gee and Eather Mgahl during the inspection. The site inspection comprised a walkover of the entire development, including the development perimeter, and an explanation of the processes and environmental controls implemented by the development.

2.6 Document and information review

Table 2.2 lists documents and information provided by SUEZ to inform the audit.

Table 2.2: Documents and information reviewed

Filename	Description
0520126 SUEZ Wetherill Park RRF Odour Audit R1.pdf	SUEZ –Wetherill Park RRF Odour Audit (May 2020)
10.133.71.1_11_20200729081952632.jpg	CCTV image

Filename	Description
10.133.71.1_11_20200729082136113.jpg	CCTV image
10.133.71.1_11_20200729082231561.jpg	CCTV image
10.133.71.1_12_20200729082349630.jpg	CCTV image
10.133.71.1_12_20200729082454214.jpg	CCTV image
10.133.71.1_12_20200729082534761.jpg	CCTV image
10.133.71.1_12_20200729083124152.jpg	CCTV image
120892 Dilapidation Report -20 Davis Road Wetherill Park.pdf	Dilapidation Report (December 2017)
16-7-2020 weekly checklist.pdf	Weekly odour monitoring checklist
170405-01 - CC1 - Applicant Set.pdf	Stage 1 Construction Certificate No. 170405-01 (July 2019)
170405-01 - CC1 - Architectural Set.pdf	Stage 1 Approved Plans (July 2019)
170405-02 - IOC - Applicant Set.pdf	Stage 1 Interim Occupation Certificate No. 170405-02 (November 2020)
17265_FERP_REV8.pdf	Flood Emergency Response Plan (November 2019)
20200520_Condition compliance B16_B17.pdf	Submission of Odour Audit (May 2020)
20200529 - final approval DPE.pdf	Approval of the Operational Environmental Management Plan SSD 7267 (May 2020)
20200818 Council surrender of consents approval.pdf	Surrender of pre-existing development consents (August 2020)
7976 Consent to discharge trade wastewater (23062017).pdf	Sydney Water Trade Waste Agreement
April2020.xls	Product delivery summary (April 2020)
Audit reports correspondence from DPIE - submit status of all actions recommended in Odour Audit.pdf	Independent Odour Audit response from DPIE (June 2020)
Audit team approval 11.08.2020_.pdf	Independent auditor approval from DPIE (August 2020)
august2020.xls	Product delivery summary (August 2020)
Automatic Report.msg	Email from meteorological station (July 2020)
Complaint about Wetherill Park Resource Recovery Facility - Letter to EPA 25082020.msg	SUEZ response to complaint (September 2020)
Complaint CAR.pdf	Corrective Action Record of complaint received 28 August 2020
Complaints_Register_at_WPRRF_05102020.docx	SUEZ complaint register as of 5 October 2020
Construction Certificate (20190831) FW P024 SUEZ Wetherill Park Stage 1 CC1 Approval.msg	Correspondence demonstrating submission of Stage 1 Construction Certificate (July 2019)
Construction Certificate Fire safety schedule 31072019.pdf	Stage 1 Construction Certificate, Fire Safety Schedule
Due Diligence Wetherill Park Resource Recovery Centre & SBS.doc	Site Environment Due Diligence Calendar (2020)
ES2007518_TW WP_ January 2020.pdf	Trade Wastewater Quality Analysis (January 2020)
ES2009861_TW WP_ March 2020.pdf	Trade Wastewater Quality Analysis (January 2020) Trade Wastewater Quality Analysis (March 2020)
ES2016584_TW_WP_May 2020.pdf	Trade Wastewater Quality Analysis (May 2020)
ES2029224_TW_WP_August 2020.pdf	Trade Wastewater Quality Analysis (August 2020)
Fairfield Council - Planning Certificate (1701208).pdf	Fairfield Council - Planning Certificate

Filename	Description
Fire safety certificate 2019 (Dec) for re-opening (Final).pdf	Fire Safety Certificate (1 December 2019)
FORM041 - Compliance Evaluation Form Wetherill Park TS 2020.xlsx	SUEZ Compliance Evaluation Form (FORM041)
july2020.xls	Product delivery summary (July 2020)
may2020.xls	Product delivery summary (May 2020)
Odour checklist 22-4-2020.pdf	Completed odour checklist (April 2020)
Odour checklist 18-02-2020.pdf	Completed odour checklist (February 2020)
OEMP - 01112019 Final V5_Jan 2020.docx	Operational Environmental Management Plan (November 2019)
OMP - Odour Management Plan WPRRF 20191018 (V3).pdf	Odour Management Plan (October 2019)
OMP - Odour Management Plan WPRRF 20200414 (V4).docx	Odour Management Plan (April 2020)
PLANS002 - TMP - Wetherill Park RRF.pdf	Operational Traffic Management Plan (October 2019)
PLANS003.2.14 - ERP Wetherill Park Resource Recovery Facility.pdf	Emergency Response Plan (June 2020)
RE EPA response to SUEZ - Compliance with consent conditions at Wetherill Park Resource Recovery Centre - licence 4548.msg	Correspondence to EPA certifying concrete sealant (April 2020)
RE SUEZ Wetherill Park SSD 7267 odour audit - DPIE major projects.msg	Correspondence from DPIE request submission of Odour Audit via online portal (May 2020)
RE Wetherill Park AEMR - Follow Up Clarifications - odour audit added to AEMR as per Carol Ng correspondence.msg	Internal correspondence confirming actions from Odour Audit to be included in annual return (October 2020)
S11308-R1.pdf	Occupational Noise Assessment (June 2020)
S11308-R2.pdf	Environmental Noise Assessment (June 2020)
sept 2020.xls	Product delivery summary (September 2020)
Service Summary - Wetherill Park.xlsx	Plant service register (2020)
SSD 7976 (A26) - Fairfield Council contribution receipt (01112017).pdf	Development contribution payment receipt (November 2017)
SUEZ Wetherill Park SSD 7267 odour audit.msg	Submission of Odour Audit via email (May 2020)
SUEZ_logfile_WPRRF_Weather_Stn_Merged 081219_280620.csv	Weather Station report for Audit Period
WE 20122019.pdf	Completed odour checklist (December 2019)
WPRRF - Daily Productivity 2020.xls.xlsx	Daily productivity volumes (2020)
WPRRF - Stormwater Drainage.ppt	Wetherill Waste Transfer Station existing stormwater drainage system (2020)
WPRRF-Weather-Stn_AD_20200715.csv	Weather station export (July 2020)
WPRRF-Weather-Stn_AD_20201016.csv	Weather station export (October 2020)
WPRRF-Weather-Stn_AD_20201027.csv	Weather station export (October 2020)
WPRRF-Weather-Stn_AP_20200913_0400.csv	Weather station export (September 2020)

2.7 Closing meeting

At the closing meeting, preliminary audit findings were presented, recommendations were made, and any post-audit actions confirmed.

CHAPTER 3

AUDIT FINDINGS

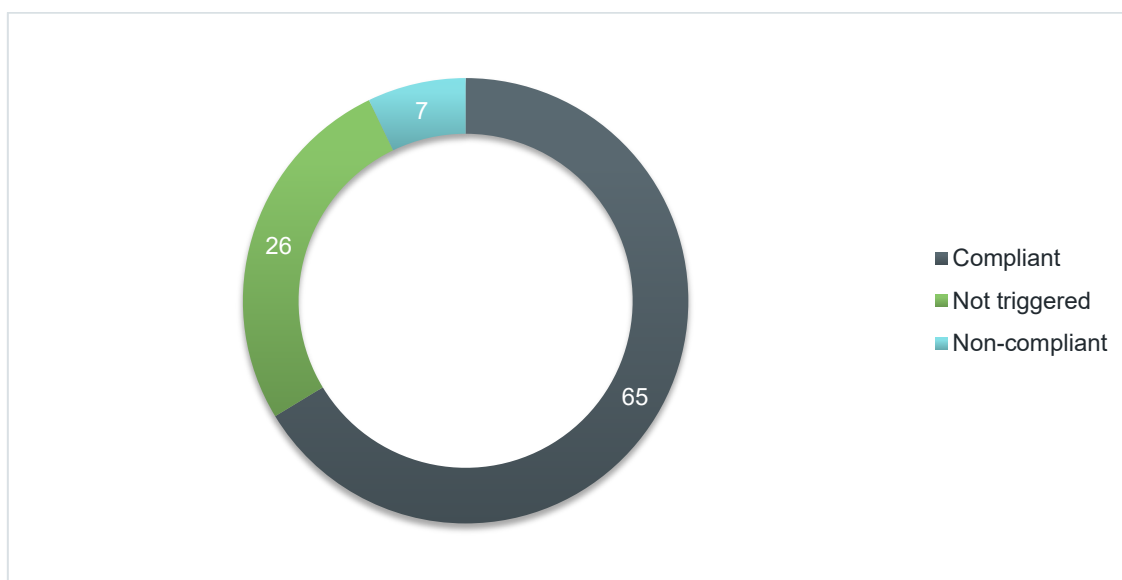
3 AUDIT FINDINGS

This section of the audit documents the audit findings based on a review of available evidence during the audit period, evaluated against the audit criteria.

3.1 Compliance performance

Compliance performance is assessed against the audit criteria detailed in Appendix A. Findings are based on an evaluation of the evidence provided, site interviews, site observations and other information as documented. A photo log of site observations is included in Appendix D. A summary of compliance findings against the audit scope is shown in Chart 3.1. The detailed evidence and findings are provided in Appendix A.

Chart 3.1: Compliance status breakdown by descriptors



3.2 Summary of agency notices, orders, penalty notices or prosecutions

The development has not been issued with agency notices, orders, penalty notices or prosecutions during the audit period.

3.3 Audit non-compliances

Table 3.1 presents the findings for non-compliances identified during the audit.

Table 3.1: Audit non-compliance findings

Approval (ID)	Findings
A27 Requirements prior to commencement of Stage 1 Operations	The development commenced Stage 1 operations on 9/12/2019; an interim Occupation Certificate for Stage 1 works was issued 2 November 2020. It was explained during site interviews that an occupation certificate had not been issued as the Principal Certifying Authority (PCA) was waiting on the surrender of the pre-existing development consents, which was confirmed on 18 August 2020. It is noted the surrender of pre-existing development consents was to occur prior to the commencement of Stage 1 operations (refer A28).

Approval (ID)	Findings
A28 Surrender of Consents	Application for surrender of all pre-existing development consents has been approved by Fairfield City Council, dated 18 August 2020, after Stage 1 operations commenced.
B5 Wastewater	SUEZ confirmed the stormwater system does not include a first flush detention tank. It was confirmed, and observed, that a keystone valve at the entrance to the property controls all stormwater discharges from the site. Therefore, if stormwater becomes contaminated, the keystone valve can be shut, stopping any contaminated stormwater from leaving the site.
B30 Traffic and Access Operational Traffic Management Plan	PCA certified SUEZ's OTMP in November 2019; DPIE approved the OTMP on 29 May 2020. It appears SUEZ requested DPIE approval of the OEMP and sub-plans (inclusive of OTMP) per correspondence dated 30/09/2019 and 24/02/2020, with DPIE approving the plans on 29/05/2020. The date of approval of the OEMP and sub-plans is after the commencement of Stage 1 operations.
B42 Litter and Pest Control Pest, vermin and noxious weed management	Waste was observed to be outside the premises. Resource recoverable material was being delivered outside the processing enclosure and had no physical control to mitigate movement off site.
C4 Operational Environmental Management Plan	PCA certified SUEZ's OEMP in November 2019; DPIE approved the OEMP on 29 May 2020. It appears SUEZ requested DPIE approval of the OEMP and sub-plans (inclusive of OTMP) per correspondence dated 30/09/2019 and 24/02/2020, with DPIE approving the plans on 29/05/2020. The date of approval of the OEMP and sub-plans is after the commencement of Stage 1 operations.
C8 Annual Review	The date of the SSD consent is 11/09/2017, however development approved by SSD 7267 only commenced construction in 2019. The first annual review is therefore due 11/09/2020.

3.4 Previous audit recommendations

No previous independent environment audits have been completed for this development.

3.5 EMP, subplans and compliance documents

All environmental management plans, subplans and compliance documents under SSD 7267 have been prepared, approved by DPIE and their implementation was observed during the site inspection and site interviews.

3.6 Environmental performance

The environmental performance of the site is generally adequate, however improvements in waste management at the recycling area should be investigated (refer Table 3.2).

Table 3.2: Environmental performance in key risk areas

Key issue	Risk	Commentary
Waste management	Integrity of waste management processes, and the potential for harmful adverse impacts on the surrounding area because of waste handling and transport.	The fully enclosed waste transfer station was not observed to present an adverse impact on the surrounding area. Resource recoverable material was however being delivered outside the recycling area and

Key issue	Risk	Commentary
		had no physical control to mitigate movement off site. Waste management associated with the waste transfer station is adequate, however waste management associated with the recycling area should be reviewed.
Air quality and odour	Odour from operation activities affecting surrounding landowners. Dust during construction and operation affecting amenity of the surrounding area.	During the site inspection the site did not demonstrate any offensive odours. Notably the deodorizer sprays were operational, dust was being managed adequately and there have been no odour complaints during the audit period. The site is managing its potential air quality and odour impacts adequately.
Traffic	Increased traffic on the roads leading to the site. Ability of the site to safely operate within increased traffic flow.	During the site inspection internal traffic movements were being managed adequately, site representatives were aware of the constraints of the site and were managing these appropriately, and the site was not having an impact on public roads. The site is managing its potential traffic impacts adequately.
Noise	Construction, operational and transport noise impacts from traffic and transfer trucks in and out of the site, machinery and plant upon sensitive receivers.	The site is located within an industrial precinct, with the nearest sensitive receiver more than 1.5 km away. The site has been demonstrated to not exceed the amenity level stipulated in the Noise Policy for Industry. The site is managing its potential noise impacts adequately.
Soil and water	Clean and dirty water (sediment laden) and leachate leaving the site and impacting downstream environments. Flooding impacts from further development of the site	The site has clear controls and processes to separate stormwater and leachate from the waste transfer station. A keystone valve and gross pollutant trap on the stormwater system at the point of discharge provides an important control to mitigate the potential for polluted stormwater leaving the site. The site has a Flood Emergency Response Plan on site which site representatives were aware of. Waste was observed to be outside the premises. The site is managing its potential water quality impacts adequately; improvements in recovering waste blown offsite should be implemented.

3.7 Consultation outcomes

FCC and EPA were notified on 29 September 2020 of the commencement of the audit. The notification requested confirmation of any complaints they had received, any observed incidents or any issues they would like examined relating to the development.

Neither stakeholder responded to the correspondence.

3.8 Complaints

Only one complaint has been recorded during the audit period, on 28 August 2020, relating to waste being dragged by departing delivery vehicles on to the public road. The complaint was submitted by email from the EPA, on behalf of FCC. SUEZ reviewed video footage of the day in question and no waste was observed to be leaving site. SUEZ provided a written response to the EPA, no further correspondence has been received by SUEZ; SUEZ subsequently closed the complaint on 27 September 2020.

3.9 Incidents

SUEZ advised that no environmental incidents had been recorded during the audit period.

3.10 Site inspection

A site inspection as part of the audit was undertaken on 6 October 2020. During the site inspection, observations on environmental performance were made and captured by site photos (refer Appendix D).

The environmental performance of the site is generally adequate, however improvements in waste management at the recycling area should be investigated.

3.11 Site interviews

The personnel listed in Section 2.4 were interviewed during the site visit. Site interviews were generally structured around understanding the operational processes and procedures, key environmental risks and how the site demonstrates compliance with SSD 7267 and manages key environmental risks.

Overall, the site interviews demonstrated that the personnel had a good understanding of environmental risks and controls required to mitigate these risks and comply with SSD 7267.

3.12 Previous annual review recommendations

No previous annual reviews have been prepared for the development.

3.13 Key strengths

At no time during the site inspection were unsafe actions or activities, or activities presenting a material harm to the environment observed. Furthermore, the personnel interviewed demonstrated a strong understanding of the requirements of SSD 7267 and their environmental performance obligations.

CHAPTER 4

RECOMMENDATIONS

4 RECOMMENDATIONS

4.1 Non-compliances

The root cause for five of the non-compliant CoA's appears to be a misunderstanding of the date from when SSD 7267 is applicable, namely: A27, A28, B30, C4 and C8. Two non-compliances are however not related to the commencement date of SSD 7267. Table 4.1 provides more detail regarding the non-compliance recommendations.

Table 4.1: Non-compliance recommendations

Approval (ID)	Recommendation	Category
A27 Requirements prior to commencement of Stage 1 Operations	An interim Occupation Certificate has been issued and submitted to Council.	Late submission
A28 Surrender of Consents	The surrender of pre-existing consents has been issued by FCC.	Late submission
B5 Wastewater	SUEZ should review the stormwater management system for the site; if a first flush system is not required then a modification should be submitted.	Design change
B30 Traffic and Access Operational Traffic Management Plan	The Operational Traffic Management Plan has been approved by DPIE.	Late submission
B42 Litter and Pest Control Pest, vermin and noxious weed management	SUEZ should consider increasing the frequency of inspection to ensure any waste observed to be leaving the site is immediately recovered.	Environmental performance
C4 Operational Environmental Management Plan	The Operational Environmental Management Plan has been approved by DPIE.	Late submission
C8 Annual Review	SUEZ should prepare an Annual Review which covers the period 11/09/2019 to 10/09/2020.	Late submission

4.2 Opportunities for improvement

The following opportunities for improvement have been identified:

- Re-commission an odour audit after the commencement of Stage 2 operations.
- Regularly review the information available on the website to identify if any new information needs to be uploaded.

APPENDIX A

AUDIT CRITERIA

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A1 Obligation to minimise harm to the environment	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all measures to prevent and/or minimise any harm to the environment that may result from the Development.	Evidence collected in this audit; observations of site.			Compliant
A2 Terms of Consent	The Applicant, in acting on this consent, must carry out the Development in accordance with the: (a) State significant development application SSD 7267; (b) EIS and RTS; (c) conditions in Schedule 2; (d) SSD 7267 MOD 1; (e) SSD 7267 MOD 2; (f) development layout plans and drawings listed in Appendix A; and (g) the Management and Mitigation Measures as identified in Appendix B.	The documents and items listed were verified through site observations, documentary evidence and review of aerial photography covering the reporting period.	Compliance with the condition has been demonstrated, noting that Stage 2 building and civil works have not yet been undertaken.		Compliant
A3 Terms of Consent	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	N/A	Not triggered		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A4 Terms of Consent	The Applicant must comply with all written requirement(s) of the Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent; (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the consent; and (c) the implementation of any actions or measures contained in these documents.	No instructions from the Secretary have been received during the reporting period.	Not triggered		Not triggered
A5 Limit Conditions	The consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EPA & Act.	Date of original consent: 11/09/2017 Date of operations: 8/12/2019	The development commenced operating under SSD 7287 within 5 years of the date of the consent.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A6 Limit Conditions	The Applicant must not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, use, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	Observations of site; Daily productivity register	The site is a licensed waste storage and waste processing facility, regulated by Environment Protection Licence 4548 (EPL 4548). The site is licensed to store general solid, hazardous, restricted solid, liquid, clinical, asbestos and other waste types. A random selection of waste receipt dockets were requested; none of the dockets observed indicated the site had received waste it was not permitted to receive.		Compliant
A7 Limit Conditions	The Applicant must not receive or process on site more than: (a) 140,000 tpa of general solid waste (putrescible); (b) 90,000 tpa of general solid waste (non-putrescible); and (c) 10 m ³ of asbestos waste per week.	Daily productivity register; Monthly tonnage reports; Observations of site (asbestos skip)	The site has not exceeded the waste receipt or processing limits of this condition.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A8 Limit Conditions	The Applicant must not store on site more than 575 m ³ or 402.5 tonnes of general solid waste (putrescible) at any given time without prior approval from the Planning Secretary in consultation with the EPA.	Site interview; Site observations; Operational management plans	During the site inspection the site was not observed to be storing large volumes of GSW (putrescible) on site. All GSW (putrescible) delivered to site was placed in the pit within the building enclosure, where it was compacted by a dozer before being tipped into a receiving truck which would transport the waste to landfill. The process observed on site is continuous and the daily incoming and outgoing waste volumes does not lend itself to storing volumes of GSW (putrescible) in excess of quantities stipulated in this condition.		Compliant
A9 Limit Conditions	The Applicant must not store general solid waste (putrescible) at the site for more than 24 hours from the time of receipt.	Site interview; Site observations; Operational management plans	During the site inspection no GSW (putrescible) had been stored on the site for more than 24hrs. The processing of GSW (putrescible) on site was observed to be a continuous process, with waste received and despatched within several hours.		Compliant
A10 Stage Submission of Plans and Programs	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or (b) combine any strategy, plan or program required by this consent.	N/A	None of the sites management plans have been submitted on a progressive basis.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A11 Stage Submission of Plans and Programs	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined must be demonstrated.	N/A	No staging.		Not triggered
A12 Stage Submission of Plans and Programs	The Applicant must retain all weighbridge records as required by the POEO (Waste) Regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Secretary and/or the EPA.	Random selection weighbridge records; annual EPA returns	SUEZ system called "Mandalay" records and documents all waste records.		Compliant
A13 Stage Submission of Plans and Programs	The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the development. The waste classification records must be made immediately available on request by the EPA and/or the Secretary.	Mandalay (weighbridge) records.	SUEZ system called "Mandalay" records and documents all waste records.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A14 Evidence of Consultation	Where consultation with any public authority is required by the conditions of this consent, the Applicant must: (a) consult with the relevant public authority prior to submitting the required documentation to the Secretary or the PCA for approval; (b) submit evidence of such consultation as part of the relevant documentation required by the conditions of this consent; (c) describe how matters raised by the public authority have been addressed and identify matters that have not been resolved; and (d) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant.	Records of consultation referred to elsewhere in this Audit Table, as required by each specific condition.	All management plans have been approved by DPIE.		Compliant
A15 Statutory Requirements	The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew	Register of licences, permits and approvals	Additional licenses and approvals identified by SUEZ include: Environment Protection Licence and Trade Waste Agreement with Sydney Water.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	or comply with such licences, permits or approval/consents.				
A16 Demolition	The Applicant must ensure that all demolition associated with the Development is carried out in accordance with Australian Standard AS 2601 :2001 : The Demolition of Structures, or its latest version and the requirements of the Work Health and Safety Regulation, 2011 ,	N/A	The focus of this audit is on site operations. No demolition has occurred since the site recommenced operations in 8/12/2019		Not triggered
A17 Structural adequacy and certification	The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA.	Construction Certificate; Occupation Certificate	A Construction Certificate (170405-01) and interim Occupation Certificate (170405-02) have been issued. The interim Occupation Certificate relates to Stage 1 works.		Compliant
A18 Structural adequacy and certification	Prior to the issues of the Final Occupation Certificate, adjustments to any public utilities necessitated by the development are to be completed in accordance with the requirements of the relevant Authority. Any utility costs are to be at no cost to council.	Site interview	Telstra services were relocated during construction at cost to SUEZ. There are no other service relocations pending.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A19 Utilities and services	Prior to the construction of any utility works associated with the Development, the Applicant must obtain relevant approvals from service providers.	Site interview	Telstra services were relocated during construction at cost to SUEZ. There are no other service relocations pending.		Compliant
A20 Utilities and services	Prior to the commencement of Stage 1 construction and Stage 2 construction, Approved Plans must be submitted to the Sydney Water "Tap In" service to determine if the development will have any impacts on Sydney Water assets.	Site interview; Sydney Water Trade Waste Agreement	SUEZ has consent from Sydney Water to discharge industrial trade wastewater for 48 months, starting from 1/6/2017. This agreement is due for renewal in July 2021.		Compliant
A21 Utilities and services	Prior to the commencement of Stage 1 operations, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.	Site interview; Sydney Water Trade Waste Agreement	SUEZ has consent from Sydney Water to discharge industrial trade wastewater for 48 months, starting from 1/6/2017. This agreement is due for renewal in July 2021.		Compliant
A22 PROTECTION OF PUBLIC INFRASTRUCTURE	Prior to the commencement of construction, the Applicant must: (a) consult with the relevant owner and/or provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure; (b) prepare	Site interview; Site observations; Dilapidation Report: Public Assets in the vicinity of the proposed development 20 Davis Road Wetherill Park	Construction is complete and there were no observed restrictions to public assets.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (c) submit a copy of this report to the Secretary and Council.				Compliant
A23 PROTECTION OF PUBLIC INFRASTRUCTURE	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the Development; and (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the Development.	Site interview	Telstra was relocated during construction at cost to SUEZ. Public assets, which included Council pavement, were not required to be relocated.		
A24 OPERATION OF PLANT AND EQUIPMENT	The Applicant must ensure that all plant and equipment used for the Development is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Service register; Site observations; Site interview	A plant service register has been provided, identifying all servicing and maintenance records. No plant or equipment was observed to be operating in an inappropriate or inefficient manner during the site inspection.		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A25 COMPLIANCE	The Applicant must ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	Site notice board; Site interviews; Site observations	All employees interviewed has a strong understanding of the requirements of the development consent, EPL and trade waste agreement. A site noticeboard included pertinent environmental information.		Compliant
A26 DEVELOPMENT CONTRIBUTIONS	<p>Prior to the issue of a Construction Certificate for any part of the Development, the Applicant must pay \$32,795.06 to Council in accordance with the Fairfield City Council Indirect (Section 94A) Development Contributions Plan 2011.</p> <p>Note: The contribution and the amount payable may be adjusted at the date of payment. Any unpaid contributions will be adjusted on a quarterly basis to account for movements in the Australian Bureau of Statistics, producer Price index — Building Construction (NSW South Wales).</p>	Consultation with council; Site interview; Official receipt	An official receipt for s94A development contribution to the value of \$32,795.06 and dated 1/11/2017 was provided. Council did not respond to a request for information on the development.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A27 REQUIREMENTS PRIOR TO COMMENCEMENT OF STAGE 1 OPERATIONS	Prior to the commencement of Stage 1 operations, the Applicant must ensure a Final Occupation Certificate, or a Compliance Certificate has been issued for the following: (a) additional pavement and hardstand; (b) stormwater system; (c) fire safety system upgrade; and (d) temporary perimeter access road.	Site interview; Occupation certificate	The development commenced Stage 1 operations on 9/12/2019; an interim Occupation Certificate for Stage 1 works was issued 2 November 2020. It was explained during site interviews that an occupation certificate had not been issued as the PCA was waiting on the surrender of the pre-existing development consents, which was confirmed on 18 August 2020. It's noted the surrender of pre-existing development consents was to occur prior to the commencement of Stage 1 operations (refer A28).	An interim Occupation Certificate has been issued and submitted to Council.	Non-compliant
A27A REQUIREMENTS PRIOR TO COMMENCEMENT OF STAGE 2 OPERATIONS	Prior to the commencement of Stage 2 operations, the Applicant must ensure a Final Occupation Certificate, or a Compliance Certificate has been issued for the following: (a) permanent access ring road; (b) the construction of an additional exit from the main transfer building to improve internal traffic flow; and (c) roller shutter within the existing waste transfer building.	N/A	Stage 2 has not been constructed.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
A28 SURRENDER OF CONSENTS	In order for the development of land to proceed in a coordinated and orderly manner and to avoid potential conflicts with this consent, the Applicant must and in the manner prescribed by clause 97 of the EP&A Regulation, surrender the development consents described in Table 1 prior to the commencement of Stage 1 operations.	Approval of surrender; Site interview	Application for surrender of all pre-existing development consents has been approved by Fairfield City Council, dated 18 August 2020, after Stage 1 operations commenced.	The surrender of pre-existing consents has been issued by FCC.	Non-compliant
B1 WASTE MANAGEMENT Receipt, storage and handling of waste	The Applicant shall only receive waste on site that is authorised for receipt by an EPL.	Observations of site; daily productivity register; EPL annual return	The site is a licensed waste storage and waste processing facility, regulated by Environment Protection Licence 4548 (EPL 4548). The site is licensed to store general solid, hazardous, restricted solid, liquid, clinical, asbestos and other waste types. A random selection of waste receipt dockets were requested; none of the dockets observed indicated the site had received waste it was not permitted to receive.		Compliant
B2 WASTE MANAGEMENT Receipt, storage and handling of waste	The Applicant shall ensure any waste generated on the site during construction is classified in accordance with the EPA's Waste Classification Guidelines, 2014 or its latest version, and disposed of to a facility that may lawfully accept the waste.	N/A	Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B3 WASTE MANAGEMENT Receipt, storage and handling of waste	The Applicant shall: (a) implement auditable procedures to: ensure the site does not accept wastes that are prohibited; ii. screen incoming waste loads; and (b) ensure that: all waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; all waste received at the site must be recorded in accordance with clause 27 of the POEO (Waste) Regulation; iii. details of the quantity, type and source of wastes received on the site must be provided to the EPA and the Secretary when requested; iv. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste; v. the asbestos storage area is maintained to not impact vehicle manoeuvrability on the temporary perimeter access road and the permanent access ring road	Operational EMP; Site interviews; Daily productivity register; Mandalay system	The Operational EMP details processes and procedures for all incoming waste screening and stockpiling. Inbound waste is tracked via the weighbridge, with records available on request. The asbestos storage area is separate from the main building and did not appear to impact vehicle manoeuvrability.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B4 WASTEWATER	The Applicant shall ensure all wastewater is discharged to sewer in accordance with a Trade Waste Agreement with Sydney Water.	Trade waste agreement; Laboratory sampling results	A selection of sampling results of trade wastewater were reviewed. The analysis results indicate Aluminium exceeded the acceptance standard quite considerably in the January 2020 and March 2020 results. Subsequent sampling results indicate all acceptance standards have been met. It is noted that a breach of these concentrations incurs a doubling of charge rates; a breach of these concentrations is not a pollution event.		Compliant
B5 WASTEWATER	The Applicant must ensure the first flush detention tank is bunded in accordance with: (a) all relevant Australian Standards;(b)for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA,1997). In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement must prevail	Site interview; Site observation; EIS	SUEZ confirmed the stormwater system does not include a first flush detention tank. It was confirmed, and observed, that a keystone valve at the entrance to the property controls all stormwater discharges from the site. Therefore, if stormwater becomes contaminated, the keystone valve can be shut, stopping any contaminated stormwater from leaving the site.	SUEZ should review the stormwater management system for the site; if a first flush system is not required then a modification should be submitted.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	to the extent of the inconsistency.				
B6 AIR QUALITY Meteorological station	Prior to the commencement of any works on-site, the Applicant must install a suitable meteorological station on the site that complies with the requirements in the EPA's Approved Methods for Sampling of Air Pollutants in New South Wales.	Site observation; Site interview; Occupation certificate; Daily weather log file; Automatic report from weather station	Compliance with the condition has been demonstrated.		Compliant
B7 AIR QUALITY Odour Management	The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Complaints Register; Site interviews	No odour complaints received from 09/12/2019 to 30/09/2020.		Compliant
B8 AIR QUALITY Odour Management	Prior to the commencement of Stage 1 operations and to the satisfaction of the EPA, the Applicant must: (a) install deodorising sprays over the vehicle entrance and exits; and (b) apply a sealant to the concrete	Site interview; Site observations	Deodorising sprays were installed on 16 October 2017 and observed to be working during inspection. A sealant was applied to the concrete working floor of the receival hall in April 2020.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	working floor in the receival hall to prevent the absorption of leachate into the tipping floor.				Compliant
B9 AIR QUALITY Odour Management	During operations, the Applicant must: (a) conduct a weekly wash-down of any tipping area contaminated with general solid waste (putrescible); (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.	Photographic evidence provided by SUEZ; Completed forms;	SUEZ verbally confirmed interior walls and tipping area are washed down weekly. This is documented in the SUEZ weekly checklist (FORM026). CCTV photographs provided showing the washdown of walls and transfer stations. The annual washdown was last carried out on 27 July 2020. All truck and trailers are cleaned by JD Truck Wash (contracted service). The weekly checklist also tracks the operational status of the deodorising sprays which are serviced quarterly.		
B10 AIR QUALITY Dust Management	The Applicant implement all measures to minimise dust generated during construction and operation of the Development.	Site observation	Dust generating activities during operations are confined to the enclosed waste transfer station. No dust observed during site inspection. Sprays within the enclosure observed to be working during inspection.		
B11 AIR QUALITY Dust Management	During construction, the Applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving	N/A	Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	the site with loads have their loads covered; (c) trucks associated with the Development do not track dirt onto the public road network; and (d) public roads used by these trucks are kept clean.				
B12 AIR QUALITY Dust Management	Prior to the commencement of Stage 2 operations, the Applicant must: (a) install dust suppression sprays over the vehicle entry and exit; and (b) install interior liner panels to facilitate wash down	N/A	Deodorising sprays observed during inspection. Construction of Stage 2 has not yet commenced.		Not triggered
B13 AIR QUALITY Dust Management	During operations, the Applicant must: conduct weekly cleaning of surge pit and tipping area where interior walls have been contaminated with putrescible waste, (b) conduct a six-monthly brush down of interior walls; and - (c) ensure that dust suppression sprays are operational when waste is being tipped and processed.	Photographic evidence provided by SUEZ; Completed forms;	SUEZ verbally confirmed interior walls and tipping area are washed down weekly; this is documented in the weekly checklist (FORM026). CCTV photographs provided show the washdown of walls and transfer stations.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B14 AIR QUALITY Odour Management Plan	Prior to the commencement of Stage 1 operations and Stage 2 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 Condition C6. The OMP must: be prepared by a suitably qualified and experienced person(s) in consultation with the EPA; describe the measures that would be implemented on-site to ensure: 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; include an ongoing monitoring program; include well defined triggers for the deployment of odour mitigation and contingency measures; and include a protocol which includes	OMP; Site observations	OMP approved by DPIE on 29 May 2020. Compliance with this condition has been demonstrated.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	contingency measures for system failures.				Compliant
B15 AIR QUALITY Odour Management Plan	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.	OMP; Site observations	OMP approved by DPIE on 29 May 2020. Compliance with this condition has been demonstrated.		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B16 AIR QUALITY Odour Audit	<p>The Applicant must carry out an Odour Audit of the Development no later than six months after the commencement of Stage 2 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:</p> <ul style="list-style-type: none"> (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 not necessarily limited to: i. mechanical ventilation; ii. operation of the building under negative pressure 	<p>Odour audit; Correspondence from the Planning Secretary; Correspondence from SUEZ</p>	<p>Stage 2 operations have not yet commenced. However, odour audit completed and submitted to DPIE and EPA on 20 May 2020. SUEZ did not seek Secretary approval of the auditor. All actions from the odour audit have been closed out.</p>	<p>Re-commission an odour audit after the commencement of Stage 2 operations.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>to minimise fugitive emissions; and iii. odour capture and control options.</p> <p>(g) include an action plan that identifies and prioritises any odour mitigation measures that may be necessary to reduce odour emissions.</p> <p>Note: The Odour Audit may be prepared so that it addresses the requirements of this consent and the EPL for the Development.</p>				Compliant
<p>B17</p> <p>AIR QUALITY</p> <p>Odour Audit</p>	<p>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 Applicants response to any recommendations contained in the Odour Audit report.</p>	<p>Correspondence with DPIE and EPA</p>	<p>Odour audit completed and submitted to DPIE and EPA on 20 May 2020.</p> <p>Odour audit available on SUEZ website: https://www.suez.com.au/en-au/who-we-are/suez-in-australia-and-new-zealand/environmental-reporting-australia/wetherill-park </p>		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B18 AIR QUALITY Odour Audit	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.	SUEZ correspondence	SUEZ is including the actions from the audit into the annual review, as request by DPIE.		Compliant
B19 SOILS, WATER QUALITY AND HYDROLOGY Discharge limits	The Development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	Site observation; Site interview	No pollution of water was observed during the inspection. Gross pollutant trap at keystone valve (site discharge point) did not have an oily sheen and was free of litter and debris. SUEZ advised there has been no pollution of water events recorded to date.		Compliant
B20 SOILS, WATER QUALITY AND HYDROLOGY Flood management	Prior to the commencement of construction, the Applicant must prepare a Flood Emergency Response Plan (FERP) for the Development in consultation with Council and to the satisfaction of the Secretary. The Plan must form part of the CEMP and OEMP required by Conditions C1 and C4 and must: (a) be prepared by a suitably qualified and experienced person(s); (b) address the provisions of the Floodplain Risk Management Guideline (OEH 2007); (c) include details of: the flood	FERP; Site observation	FERP approved by DPIE on 29 May 2020. Compliance with this condition has been demonstrated.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	emergency responses for both construction and operation phases of the Development; ii. predicted flood levels; iii. flood warning time and flood notification; iv. assembly points and evacuation routes; evacuation and refuge protocols; and vi. awareness training for employees and contractors.				Compliant
B21 SOILS, WATER QUALITY AND HYDROLOGY Flood management	The Applicant shall ensure the FERP (as required and approved by the Secretary from time-to-time) is implemented for the operational life of the Development.	Site interview; Operational EMP;	Employees were aware of the FERP and the notice board included an emergency evacuation plan.		
B22 SOILS, WATER QUALITY AND HYDROLOGY Flood management	During construction and operation of the Development, the Applicant must not use the driveways modelled as high hazard in the FIA as an evacuation route during times of flooding.	Flood information Sheet; FERP (rev 8)	Compliance with this condition has been demonstrated		
B23 SOILS, WATER QUALITY AND HYDROLOGY Stormwater Management System	The Applicant must design, install and operate a stormwater management system for the Development. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance	SUEZ stormwater drainage diagram; Occupation Certificate	The PCA has certified the stormwater management system as endorsed by Sparks & Partners Consulting Engineers.		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	with the conceptual design in the EIS and applicable Australian Standards; (c) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997); (d) divert existing clean surface water around operational areas of the site; (e) prevent firewater and contaminated water from entering the stormwater management system; (f) direct all sediment laden water in overland flow away from the leachate management system; and (g) prevent cross-contamination of clean and sediment or leachate laden water.				Compliant
B24 SOILS, WATER QUALITY AND HYDROLOGY Chemical spills and fire water containment	To ensure that chemical spills and fire-water are contained on-site, prior to the commencement of Stage 1 operations and to the satisfaction of FRNSWJ the Applicant must ensure: (a) the stormwater isolation valve is automatically initiated upon either sprinkler activation and/or alternatively via activation	Site interview; Site observation; Occupation Certificate	Keystone valve clearly visible and holding tank did not have an oily sheen and was free of litter and debris. Occupation Certificate references engineering drawings by Sparks & Partners Consulting Engineers, dated 28/11/2029.		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>of any Manual Call Point installed within the site;</p> <p>(b) the stormwater isolation valve functionality should include a fail-safe function on power failure which automatically closes the valve. The stormwater isolation valve must remain in the closed position until a manual over-ride function is initiated upon confirmation that stormwater isolation is no longer required or once any contaminated water is disposed via trade waste or at a site that can lawfully receive the waste; and (c) the location of the stormwater isolation valve and any associated controls must be clearly identified on the site's fire hydrant block plan, fire sprinkler block plan and the site plan located within the site's Emergency Response Plan.</p>				

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B25 SOILS, WATER QUALITY AND HYDROLOGY Sprinkler and fire hydrant system	<p>Prior to the commencement of Stage 1 operations and to the satisfaction of FRNSW, the Applicant must ensure:</p> <p>(a) the sprinkler system is installed and maintained throughout the site in accordance with Specification E1.5 of the National Construction Code (Australian Building Codes Board, 2016) and in accordance with the latest version of AS 2118.1-1999;</p> <p>(b) the fire hydrant system is designed, installed, maintained and commissioned in accordance Specification E1.3 of the National Construction Code (Australian Building Codes Board, 2016) with the latest version of AS 2419.1-2005; and</p> <p>(c) the temporary perimeter access road and the permanent ring road is constructed in accordance with Policy No 4: Guidelines for Emergency Vehicle Access (NSW Fire Brigade, 2010).</p>	Construction Certificate; Occupation Certificate; correspondence from FRNSW	<p>Fire safety certificate signed 22 November 2019.</p> <p>Occupation Certificate has certified engineering drawings by Sparks & Partners Consulting Engineers, dated 28/11/2029.</p>		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B26 SOILS, WATER QUALITY AND HYDROLOGY Imported soil	The applicant must: a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Department upon request.	N/A	Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered
B27 SOILS, WATER QUALITY AND HYDROLOGY Erosion and sediment control	Prior to the commencement of construction, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition CI	N/A	Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered
B28 TRAFFIC AND ACCESS Parking	Prior to the commencement of Stage 1 operations, the Applicant must provide 21 on-site parking spaces for visitors and staff (including one accessible parking space) and 8 on-site parking spaces for heavy vehicles to ensure that traffic associated with the Development does	Occupation Certificate; Engineering drawings; Site observation	Occupation Certificate has certified engineering drawings by Sparks & Partners Consulting Engineers, dated 28/11/2029.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	not utilise public and residential streets or public parking facilities. Parking areas must be constructed in accordance with the latest version of AS 2890.				Compliant
B29 TRAFFIC AND ACCESS Operating conditions	The Applicant must ensure: (a) internal roads, driveways, and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest version of AS 290.1 and AS 2890.2; (b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines; (c) the Development does not result in any vehicles queuing on the public road network; (d) heavy vehicles and bins associated with the Development are not parked on local roads or footpaths in the vicinity of the site; (e) all vehicles are wholly contained on site before	Occupation Certificate; Engineering drawings; Site observation	Occupation Certificate has certified engineering drawings by Sparks & Partners Consulting Engineers, dated 28/11/2029. Internal manoeuvrability of vehicles along the access roads was not observed to be an issue during the inspection, but site interviews did explain that it can be problematic at times. No heavy vehicles associated with the development were observed to be parking on local roads or footpaths. The weighbridge was observed to be have been moved 7 metres to the west and no queuing of vehicles was observed.		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>being required to be stopped;</p> <p>(f) all loading and unloading of materials is carried within the waste transfer station building;</p> <p>(g) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network;</p> <p>(h) the weighbridge stop line is moved 7 m to the west to prevent queuing on Davis Road;</p> <p>(i) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; and</p> <p>(j) the temporary perimeter access road is sealed.</p>				
<p>B30</p> <p>TRAFFIC AND ACCESS</p> <p>Operational traffic management plan</p>	<p>Prior to the commencement of Stage 1 operations and Stage 2 operations, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the Development to the satisfaction of the Secretary. The plan must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C6 and must:</p> <p>(a) be prepared by a suitably qualified and</p>	<p>Site interview;</p> <p>Correspondence</p>	<p>PCA certified SUEZ's OTMP in November 2019; DPIE approved the OTMP on 29 May 2020. It appears SUEZ requested DPIE approval of the OEMP and sub-plans (inclusive of OTMP) per correspondence dated 30/09/2019 and 24/02/2020, with DPIE approving the plans on 29/05/2020. The date of approval of the OEMP and sub-plans is after the commencement of Stage 1 operations.</p>	<p>The Operational Traffic Management Plan has been approved by DPIE.</p>	<p>Non-compliant</p>

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>experienced person(s);</p> <p>(b) be prepared in consultation with Council;</p> <p>(c) detail the measures that are to be implemented to ensure road safety and network efficiency including restricting queuing or parking of vehicles on Davis Road; (d) detail heavy vehicle routes, access and parking arrangements; include a Driver Code of Conduct to:</p> <ul style="list-style-type: none"> i. minimise the impacts on the local and regional road network; ii. minimise conflicts with other road users; iii. minimise road traffic noise; iv. ensure truck drivers use specified routes; and v. include a program to monitor the effectiveness of these measures. 				
<p>B31</p> <p>TRAFFIC AND ACCESS</p> <p>Operational traffic management plan</p>	<p>The Applicant shall ensure the OTMP (as required and approved by the Secretary from time-to-time) is implemented for the operational life of the Development.</p>	<p>Site observation</p>	<p>Traffic zones and movements (traffic flows) indicated in the OTMP were observed to being followed by incoming and outgoing vehicles.</p>		Compliant
<p>B32</p> <p>NOISE</p> <p>Hours of work</p>	<p>The Applicant must comply with the hours detailed in Table 2;</p>	<p>Site interview; Complaint register</p>	<p>Employees interviewed demonstrated a good understanding of the facilities working hours. No complaints about working hours has been received during the reporting period.</p>		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B33 NOISE Hours of work	Works outside of the hours identified in Condition B32 may be undertaken in the following circumstances: (a) works that are inaudible at the nearest sensitive receivers; (b) works agreed to in writing by the Secretary; (c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (d) where it is required in an emergency to avoid the loss of lives, property and [or prevent environmental harm.	N/A	This condition focusses on construction working hours. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered
B34 NOISE Construction noise limits	The Development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009). All noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in the EIS.	N/A	This condition focusses on construction working hours. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B35 NOISE Operational noise limits	<p>The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits in Table 3.</p> <p>Note: Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy</p>	<p>Environmental noise assessment; EIS; Site observation</p>	<p>An environmental noise assessment prepared by Hibbs & Associates (June 2020). This assessment is limited and does not take into consideration the noise limits of B35 but it does present a measured noise level at the boundary of the site during typical operations. This measured noise level is below the Noise Policy for Industry amenity levels. It is however worth noting that the nearest sensitive receivers are more than 1.5km from the site, and taking into account the measured noise level at the property boundary being less than 70 dBA, the site is unlikely to have any influence over the noise environment of these receivers.</p>		Compliant
B36 NOISE Noise mitigation	<p>The Applicant must:</p> <p>(a) implement best practice, including all noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development;</p> <p>(b) minimise the noise impacts of the development during adverse meteorological conditions; (c) maintain the effectiveness of any noise suppression</p>	<p>Site observation; Environmental noise assessment; Occupational noise assessment</p>	<p>The noise assessments reviewed indicate the site is implementing all necessary measures to demonstrate compliance with this condition.</p>		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	equipment on plant at all times and ensure defective plant and equipment is not being used operationally until fully repaired; and (d) regularly assess noise emissions and relocated, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.				Compliant
B37 NOISE Construction and operational noise management	The Applicant must ensure that all its vehicles are fitted with a broadband reversing alarm.	Site observation	SUEZ plant and vehicles were using broadband reversing alarms.		
B38 VIBRATION Vibration criteria	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, German Standard DIN 4150 Part 3 Structural Vibration in Buildings. Effects on Structures; and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: A Technical Guideline (Department of Environment and Conservation, 2006).	N/A	This condition focusses on vibration from construction activities. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B39 HAZARDS AND RISK	<p>The Applicant store all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's 'Storing and Handling of Liquids: Environmental Protection — Participants Handbook' 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>	Site observation; Site interview	A small fuel tank for onsite refuelling was identified. Compliance with this condition has been demonstrated.		Compliant
B40 HAZARDS AND RISK Dangerous Goods	<p>The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines — Applying SEPP 33 at times.</p>	Site observation; Site interview	Compliance with this condition has been demonstrated.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B41 HAZARDS AND RISK Dangerous Goods	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with: (a) all relevant Australian Standards; (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA, 1997).</p> <p>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	Site observation; Site interview	Compliance with this condition has been demonstrated.		Compliant
B42 LITTER AND PEST CONTROL Pest, vermin and noxious weed management	The Applicant must: (a) ensure all waste loads are covered unless within the waste transfer station building; and (b) maintain the site in a clean and tidy state at all times.	Site interview; Site observation	Waste was observed to be outside the premises. Resource recoverable material was being delivered outside the processing enclosure and had no physical control to mitigate movement off site.	SUEZ should consider further management measures to prevent waste from leaving the site and should increase the frequency of inspections to ensure any waste observed to be leaving the site is immediately recovered.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B43 LITTER AND PEST CONTROL Pest, vermin and noxious weed management	<p>The Applicant must:</p> <p>(a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and</p> <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 the surrounding area.</p> <p>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</p>	Site observation	No noxious weeds observed during the inspection; pest control devices were observed. Site environmental due diligence calendar has been provided which identifies all scheduled due diligence work for the forthcoming year.		Compliant
B44 LITTER AND PEST CONTROL Contamination	<p>Prior to the commencement of Stage 1 construction, the Applicant must prepare an unexpected finds protocol to ensure that potentially contaminated material is appropriately managed. The protocol must form part of the CEMP required by Condition CI and must ensure any material identified as contaminated must be disposed off-site, with the</p>	N/A	Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	disposal location and results of testing submitted to the Secretary, prior to its removal from the site.				
B45 LITTER AND PEST CONTROL Transgrid transmission line easement	The Applicant must ensure no works of any kind are permitted within the 20-metre exclusion zone surrounding the transmission line tower.	Site observation	No works were being undertaken within the transmission easement and there is no evidence of any recent works having been undertaken.		Compliant
B46 LITTER AND PEST CONTROL Transgrid transmission line easement	The Applicant must ensure that the existing ground level is to be retained at the site and the AUS7000 clearance requirement shall be met for the proposed driveway within TransGrid's easement.	Site observation	No clear or apparent changes to ground levels within the easement.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B47 LITTER AND PEST CONTROL Transgrid transmission line easement	The Applicant must ensure that all works shall be carried out in accordance with the NSW WorkCover's 'Work Near Overhead Power Lines' Code of Practice 2006 and TransGrid's Easement Guidelines for Third Party Development (V10). A safe unobstructed working platform shall be preserved around the transmission line structures for access by EWP, cranes as well as other large plant and equipment. No obstructions of any type shall be placed within 30 metres of any part of a transmission line structure.	N/A	No works were being undertaken within the transmission easement and there is no evidence of any recent works having been undertaken.		Not triggered
B48 LITTER AND PEST CONTROL Transgrid transmission line easement	The Applicant ensure that the design of access ways/roads to TransGrid's easement and structures shall cater for the weight and size of TransGrid's maintenance vehicles that have a 40 tonne load capacity	N/A	No access ways or roads to Transgrid easement and structures have been constructed.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B49 LITTER AND PEST CONTROL Transgrid transmission line easement	The Applicant must ensure that all activities and operating plant within the easement are limited to a height restriction of 4.3 m above ground height to ensure safe clearances to the overhead powerline.	N/A	No works were being undertaken within the transmission easement and there is no evidence of any recent works having been undertaken.		Not triggered
B50 LITTER AND PEST CONTROL Transgrid transmission line easement	During construction, the Applicant must take adequate precautions to protect structures from accidental damage.	N/A	The focus of this audit is on site operations. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered
B51 LITTER AND PEST CONTROL Transgrid transmission line easement	The Applicant must ensure that the easement area shall not be used for temporary storage of construction spoil, topsoil, gravel or any other construction material.	N/A	The focus of this audit is on site operations. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
B52 LITTER AND PEST CONTROL Transgrid transmission line easement	The Applicant must ensure that no obstruction of any type shall be placed within 30 m of any part of a transmission line structure.	Site observation	No obstructions were within the transmission easement.		Compliant
B53 LITTER AND PEST CONTROL Transgrid transmission line easement	During construction, the Applicant must ensure that TransGrid have unrestricted access for the purpose of undertaking normal maintenance and inspection activities. At completion of works, access to transmission lines and structures must be freely available at all times for TransGrid plant and personnel.	N/A	The focus of this audit is on site operations. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered
B54 LITTER AND PEST CONTROL Transgrid transmission line easement	The Applicant must provide formal written notification of any amendment and/or additional works proposed to the subject site. Any additional works proposed within the easement require an assessment by TransGrid to ensure that clearances to transmission lines and structures are met. TransGrid's clearance requirements must be	N/A	The focus of this audit is on site operations. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	met to ensure public safety.				
B55 VISUAL AMENITY Lighting	The Applicant must ensure the lighting associated with the Development: (a) complies with the latest version of AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting; 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.	N/A	No new external lighting has been installed.		Not triggered
C1 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN	The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Secretary. The CEMP must: (a) be prepared to the satisfaction of the Secretary prior to the commencement of Stage 1 construction and Stage 2 construction; (b) identify the statutory	N/A	The focus of this audit is on site operations. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>approvals that apply to the Development; outline all environmental management practices and procedures to be followed during construction works associated with the Development;</p> <p>(d) explain the controls that would be implemented to minimise dust emissions during construction of the Development;</p> <p>(e) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages; (f) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts; describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and (h) include the management plans required under Condition C2 of this consent.</p>				

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
C2 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN	As part of the CEMP required under Condition C! of this consent, the Applicant must include the following: (a) FERP (see Condition 820); (b) Erosion and Sediment Control Plan (see Condition B27); and (c) unexpected finds protocol (see Condition B44).	N/A	The focus of this audit is on site operations. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered
C3 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN	The Applicant must carry out the construction of the Development in accordance with the CEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	N/A	The focus of this audit is on site operations. Construction of Stage 1 was completed on 8/12/2019, and construction of Stage 2 has not yet commenced.		Not triggered
C4 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN	The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Secretary. The OEMP must: (a) be prepared to the satisfaction of the Secretary prior to the commencement of Stage 1 operations and Stage 2 operations; (b) be prepared by a suitably qualified and experienced expert; (c) provide the strategic framework for environmental	DPIE correspondence; Occupational Certificate	PCA certified SUEZ's OEMP in November 2019; DPIE approved the OEMP on 29 May 2020. It appears SUEZ requested DPIE approval of the OEMP and sub-plans (inclusive of OTMP) per correspondence dated 30/09/2019 and 24/02/2020, with DPIE approving the plans on 29/05/2020. The date of approval of the OEMP and sub-plans is after the commencement of Stage 1 operations.	The Operational Environmental Management Plan has been approved by DPIE.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>management of the Development;</p> <p>(d) identify the statutory approvals that apply to the Development;</p> <p>(e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;</p> <p>(f) describe the procedures that would be implemented to: keep the local community and relevant agencies informed about the operation and environmental performance of the Development; ii. receive, handle, respond to, and record complaints; resolve any disputes that may arise; respond to any non-compliance; respond to emergencies; and</p> <p>(g) include the following environmental management plans: i. OMP (see Condition BI 4); ii. FERP (see Condition 820); iii. OTMP (see Condition 830); and</p>				
C5 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN	The Applicant must operate the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to	Site interview; Site observations	Compliance with this condition has been demonstrated.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	time), unless otherwise agreed by the Secretary.				Compliant
C6 MANAGEMENT PLAN REQUIREMENTS	The Applicant must ensure that the environmental management plans required under Condition C1 and Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include: (a) detailed baseline data; (b) a description of: the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. any relevant limits or performance measures/criteria; and iii. the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; (c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or	OEMP and any other associated management plan	Approval of the OEMP and subplans issued by DPIE on 29 May 2020.		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	performance measures/criteria; (d) a program to monitor and report on the: impacts and environmental performance of the Development; and ii. effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the Development over time; (g) a protocol for managing and reporting any: incidents; ii. complaints; non-compliances with statutory requirements; and iv. exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan.				Compliant
C7 REVISION OF STRATEGIES, PLANS AND PROGRAMS	Within three months of: (a) approval of a modification; (b) approval of an annual review under Condition C8; (c) submission of an incident report under Condition C9; or (d) completion of an audit	OEMP and subplans	The OEMP and subplans are all relevant to current site conditions.		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	under Condition C12, the Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.				
C8 ANNUAL REVIEW	Each year, the Applicant must review the environmental performance of the Development to the satisfaction of the Secretary. This review must: (a) describe the development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year; (b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against the: the relevant statutory requirements, limits or performance measures/criteria; ii. requirements of any plan or program required under this consent; iii. the monitoring results of previous years; and iv. the relevant predictions in the EIS; (c) identify	Site interview	The date of the SSD consent is 11/09/2017, however development approved by SSD 7267 only commenced construction in 2019. The first annual review is therefore due 11/09/2020.	SUEZ should prepare an Annual Review which covers the period 11/09/2019 to 10/09/2020.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the Development; (e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and describe what measures will be implemented over the next year to improve the environmental performance of the Development.				
C9 REPORTING Incident reporting	Within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, a report shall be supplied to the Department outlining the basic facts. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Secretary no later than 14	Site interview	SUEZ has advised no incident has been recorded in the reporting period.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	days after the incident or potential incident.				Compliant
C10 REPORTING Incident reporting	The Applicant shall maintain a register of accidents, incidents and potential incidents. The register shall be made available for inspection at any time by the independent Hazard Auditor and the Department.	SUEZ Integrated Management System (SIMS)	Compliance with this condition has been demonstrated.		
C11 REPORTING Regular reporting	The Applicant must provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	https://www.suez.com.au/en-au/who-we-are/suez-in-australia-and-new-zealand/environmental-reporting-australia/wetherill-park	Compliance with this condition has been demonstrated.		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
C12 AUDITING Independent Environmental Audit	<p>Within one year of the commencement of operation, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the Development. Division 2B of Part 6 of the EP&A Act applies to these audits, which are for the purposes of ascertaining information in relation to the environmental performance of the Development and the adequacy of strategies, plans and programs. Audits must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including</p>	Letter from DPIE endorsing the independent auditor	This audit		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.</p> <p>Note : This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.</p>				
<p>C13</p> <p>AUDITING</p> <p>Independent Environmental Audit</p>	<p>Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The Applicant must implement</p>	N/A			Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	these recommendations to the satisfaction of the Secretary.				
C14 ACCESS TO INFORMATION	The Applicant must: (a) make copies of the following publicly available on its website: the documents referred to in Condition A2; ii. all current statutory approvals for the Development; iii. all approved strategies, plans and programs required under the conditions of this consent; iv. a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; v. a complaint register updated on a monthly basis; vi. the annual reviews of the Development; vii. any independent environmental audit of the Development and the Applicant's response to the recommendations in any audit; viii. any other matter required by the Secretary; and ix. keep	https://www.suez.com.au/en-au/who-we-are/suez-in-australia-and-new-zealand/environmental-reporting-australia/wetherill-park	The following information is available on SUEZ public website: Construction environmental management plan, operational environmental management plan, odour management plan, Odour Audit (May 2020), development consent, environment protection licence	Include the following: (1) a summary of the complaint register (excluding any personal or contact information); (2) environmental noise assessment; (3) annual review (when prepared); (4) this audit (once finalised)	Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	this information up to date, to the satisfaction of the Secretary				

APPENDIX B

PLANNING SECRETARY AUDIT
TEAM AGREEMENT



SUEZ Recycling & Recovery Pty Ltd
Level 4, 3 Rider Boulevard
Rhodes NSW 2138

Attention: Kelly Gee

Dear Kelly

**Agreement of Independent Auditor
Project Name - SSD 7267, as modified**

I refer to correspondence (SSD-7267-PA-2) seeking the agreement of the Planning Secretary of the Department of Planning, Industry and Environment (**Department**) of a suitably qualified, experienced and independent audit team to undertake an independent environmental audit of the Wetherill Park Waste Transfer Station (WTS) operated by SUEZ Recycling & Recovery Pty Ltd under SSD 7267.

In accordance with Condition C12 of SSD 7267, and as a delegate of the Planning Secretary, I agree to the appointment of the following audit team from Element Environment Pty Ltd:

- Darren Green, Lead auditor; and
- Neville Hattingh, Peer reviewer and audit challenger

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the requirements of Conditions C12 and C13 of SSD 7267. The Department also recommends consideration be given to the *Independent Audit Post Approval Requirements* (Department 2020) to the extent that it does not contradict Conditions C12 and C13 of SSD 7267. 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.

If you have any questions, please contact me on (02) 8217 2068 or email compliance@planning.nsw.gov.au

Yours sincerely,

Julia Pope
Team Leader Compliance - Metro Projects
As nominee of the Secretary

APPENDIX C

CONSULTATION

29 September 2020

Attention: George Vlamis
Group Manager: City Development and Compliance



Fairfield City Council
86 Avoca Road
Wakeley
NSW 2176

PO Box 1563
Warriewood
NSW 2102

ABN 45 162 835 083

Email: mail@fairfieldcity.nsw.gov.au

Dear George

Independent Environmental Audit of the SUEZ Wetherill Park Waste Transfer Station

I am writing to inform you that I have been engaged by SUEZ Recycling and Recovery Pty Ltd (SUEZ), with the endorsement of the Planning Secretary, to independently audit the environmental performance of the Wetherill Park Waste Transfer Station at 20 Davis Road, Wetherill Park.

The Wetherill Park Waste Transfer Station operates under development consent number SSD 7267 and the audit is intended to be carried out during the months of October and November 2020, in accordance with condition C12 of the consent. It is a requirement of condition C12 that the auditor consults with relevant agencies to obtain their input into the scope of the audit.

I therefore kindly request confirmation of any complaints you have received, any observed incidents or any issues you would like examined relating to the development.

Given the scheduled duration of the audit, it would be appreciated if this information were provided before 13 October 2020.

If you have any questions please don't hesitate to get in contact.

Kind Regards

A handwritten signature in black ink, appearing to read 'Darren Green', is written over a horizontal line.

Darren Green
Associate

0418 969 624
darren@elementenvironment.com.au

29 September 2020

Attention: Nadine Constantinou
Operations Officer – Waste Compliance



NSW Environment Protection Authority
Level 14
59-61 Goulburn Street
Sydney
NSW 2000

PO Box 1563
Warriewood
NSW 2102

ABN 45 162 835 083

Email: nadine.constantinou@epa.nsw.gov.au

Dear Nadine

Independent Environmental Audit of the SUEZ Wetherill Park Waste Transfer Station

I am writing to inform you that I have been engaged by SUEZ Recycling and Recovery Pty Ltd (SUEZ), with the endorsement of the Planning Secretary, to independently audit the environmental performance of the Wetherill Park Waste Transfer Station at 20 Davis Road, Wetherill Park.

The Wetherill Park Waste Transfer Station operates under development consent number SSD 7267 and the audit is intended to be carried out during the months of October and November 2020, in accordance with condition C12 of the consent. It is a requirement of condition C12 that the auditor consults with relevant agencies to obtain their input into the scope of the audit.

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Given the scheduled duration of the audit, it would be appreciated if this information were provided before 13 October 2020.

If you have any questions please don't hesitate to get in contact.

Kind Regards

A handwritten signature in black ink, appearing to read 'Darren Green'.

Darren Green
Associate

0418 969 624
darren@elementenvironment.com.au

APPENDIX D

SITE PHOTOGRAPHS



Photo 4.1: 20201005_220109915_iOS

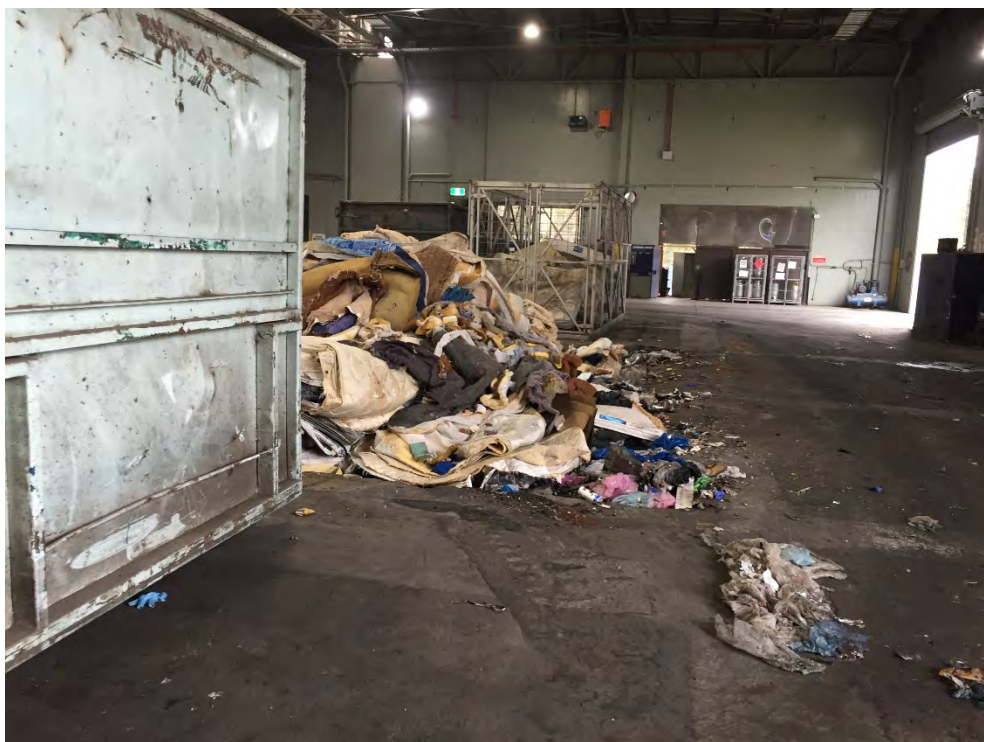


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Photo 4.15: 20201005_221101359_iOS



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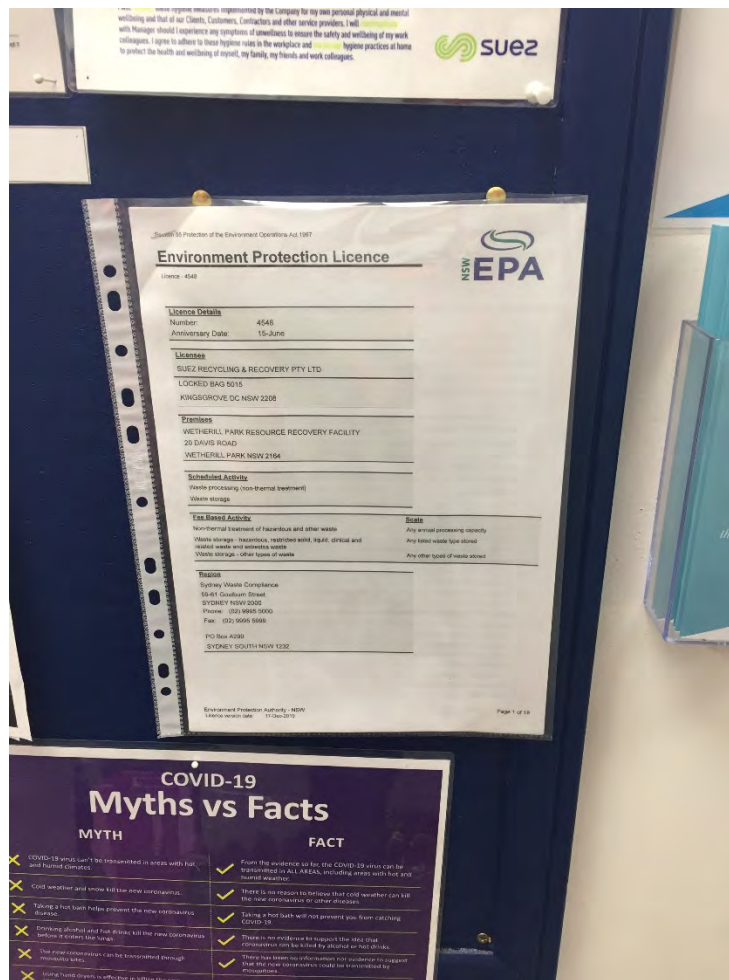


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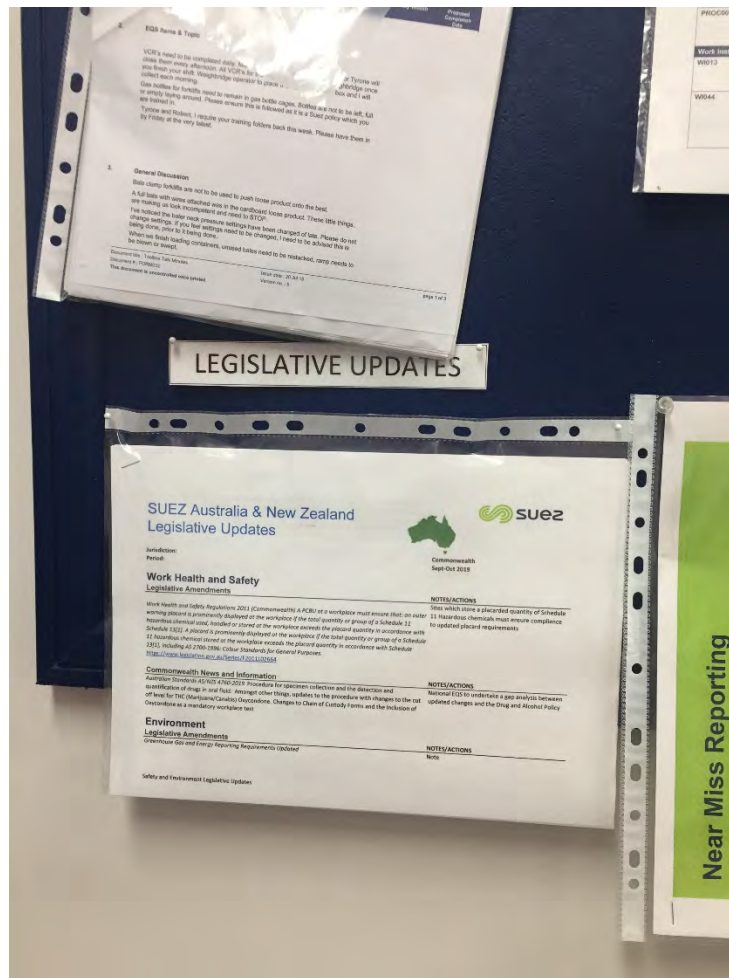


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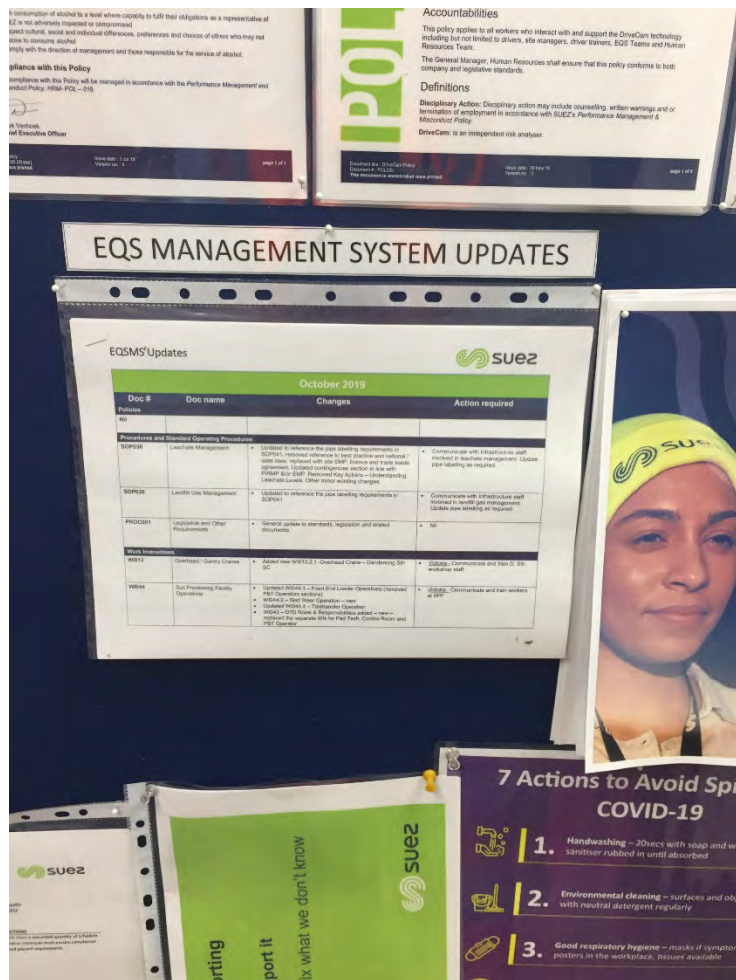


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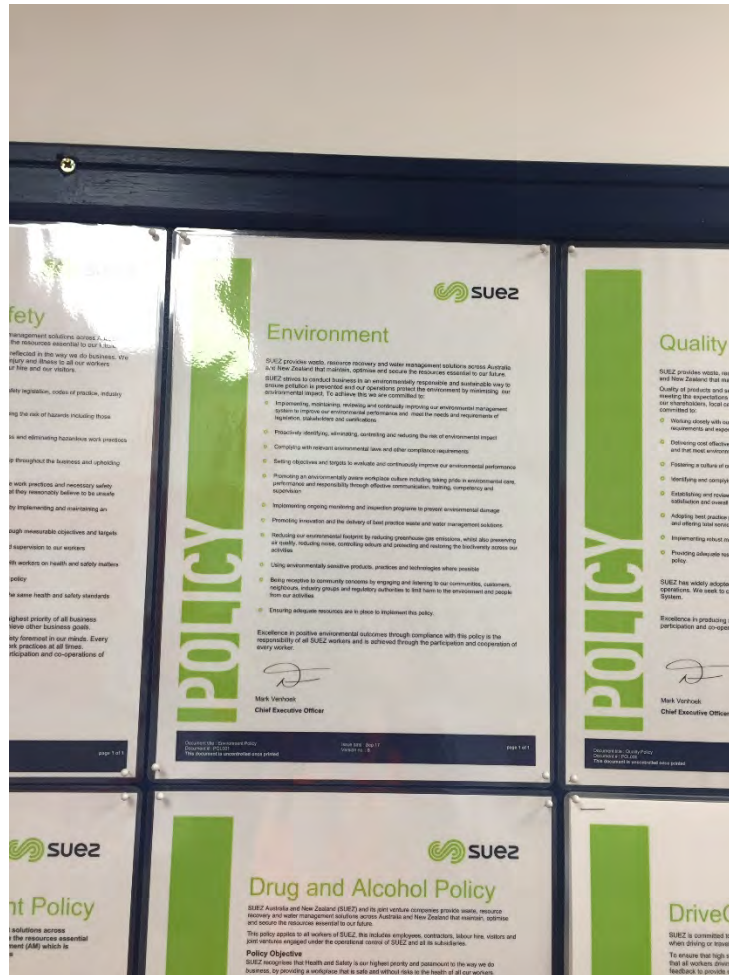


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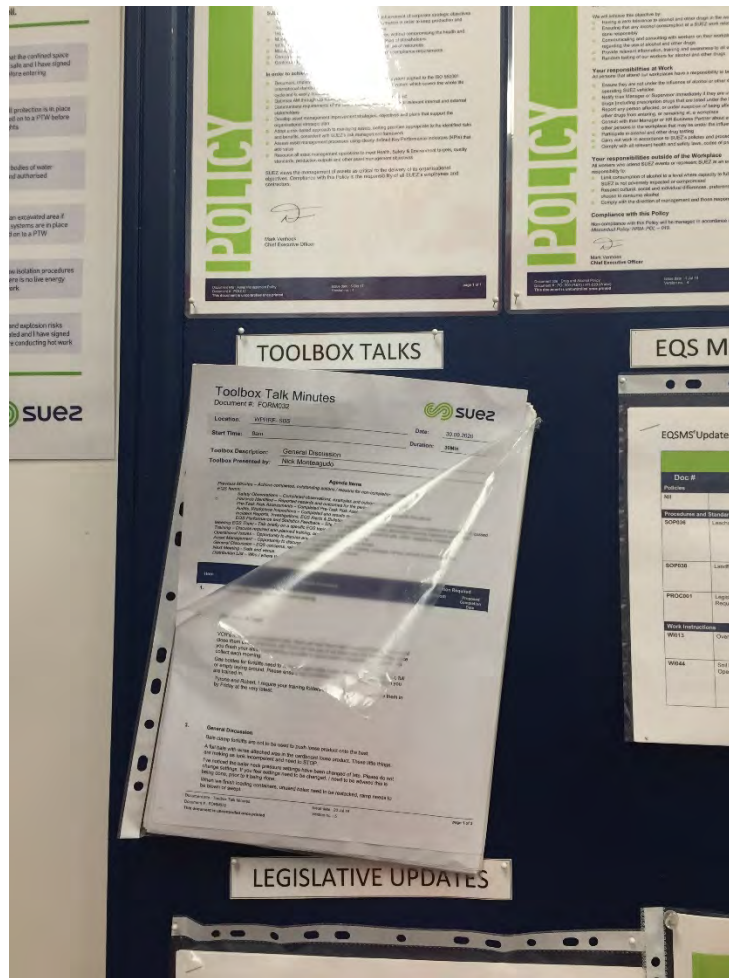


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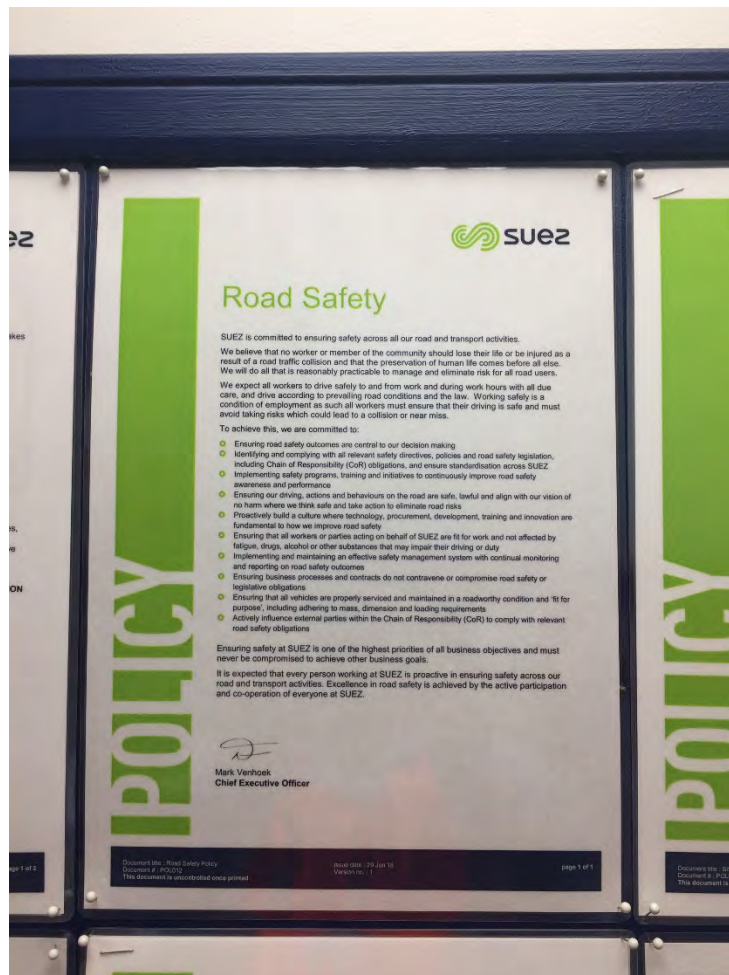


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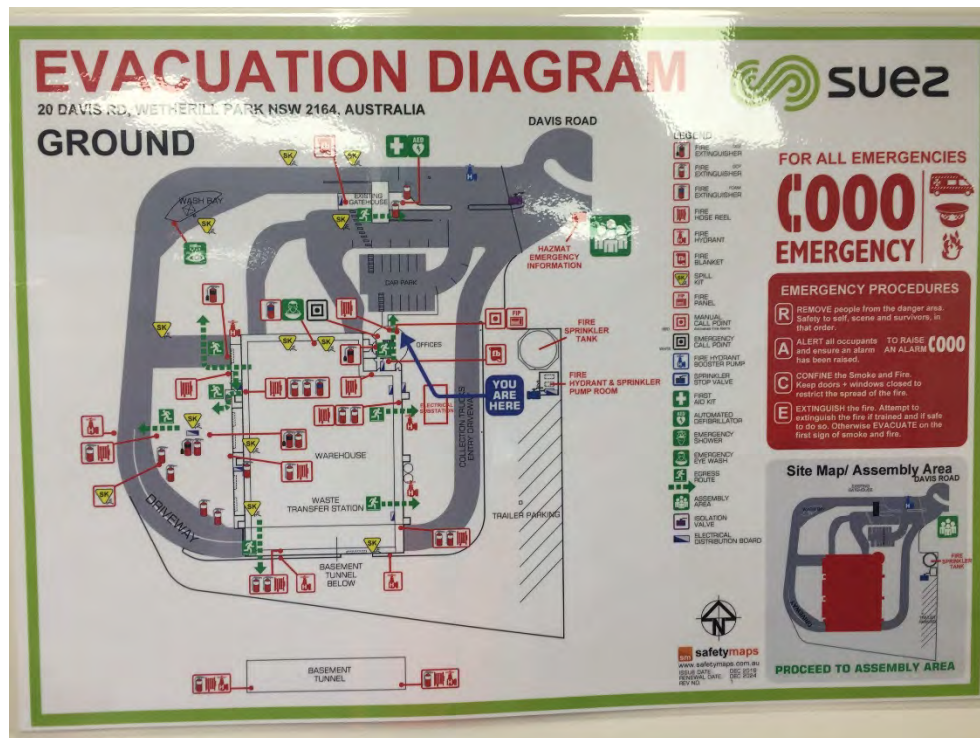


Photo 4.69: 20201006_003922085_iOS



Photo 4.70: 20201006_003910545_iOS



SYDNEY NEWCASTLE CENTRAL COAST MACKAY
elementenvironment.com.au

