



2023 Independent Environmental Audit Report

Veolia Australia and New Zealand
Independent Environmental Audit - Wetherill Park Resource Recovery Facility
SAA230015.01
21 September 2023

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EXECUTIVE SUMMARY

Epic Environmental Pty Ltd (Epic) was engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Wetherill Park Resource Recovery Facility (WPRRF) (the site). This document outlines the method, findings, and recommendations of the 2023 IEA. The IEA was undertaken between June 2023 and August 2023. The IEA scope included activities undertaken at the site during the period November 2020 to July 2023.

The purpose of the IEA was to address the requirements of Condition C12 of the development consent (SSD 7267) and assess overall compliance and environmental performance of the site. In accordance with Condition C12 of the Development Consent, the IEA team was approved by the Director-General.

The IEA criteria which the site was assessed against for this IEA included:

- Findings of the 2020 IEA (Element Environment, 2021)
- Conditions of SSD 7267
- Conditions of EPL 4548
- Requirements within the WPRRF Operational Environmental Management Plan (the OEMP) and associated sub-plans

The IEA included an opening meeting, IEA interviews, site inspection and closing meeting. A suite of evidence and material was provided by Veolia to verify the findings of the IEA.

IEA Findings

Overall, Veolia achieved 90% compliance against all of the IEA criteria for the 2023 IEA. A total of 149 individual requirements / conditions were audited across the IEA criteria, with 44 requirements / conditions determined to be not triggered at the time of the IEA. A total of ten audited requirements / conditions were identified to be non-compliant during the IEA (eight against the development consent and two against the EPL).

In addition to the high level of compliance demonstrated by Veolia, Epic identified multiple positive observations during the IEA. These included the high level of housekeeping across the site, knowledge of the weighbridge operators, comprehensive management plans.

The key non-compliances identified during the IEA include:

- Exceedance of waste limits on site
 - Noting this was the result of several waste facilities diverting waste to the Wetherill Park Facility due to a significant rainfall event
- Waste remaining on site for greater than 24 hours
 - Noting a change in operating hours (the site no longer operates seven days a week)
- A first flush system had not been installed as required by the development consent conditions
- Exceedance of water quality limits as outlined in the consent to discharge (trade waste agreement with Sydney Water)
- Final occupation certificate yet to be obtained (interim certificate has been received)

IEA Recommendations

Based on the IEA findings a variety of recommendations have been provided to address non-compliances or to improve overall environmental management. The key recommendations to address the non-compliances included:

- Continue to monitor weather events and ensure waste that is accepted, processed onsite does not exceed the limits as outlined in this conditions
- Prepare and submit a modification to the consent requesting a change in wording to this condition to reflect the facilities operating hours
- Install the first flush system and provide evidence once works are complete and that it has been installed/certified by a suitably qualified person
- Obtain final certification upon completion of stage 2 construction

All recommendations should be considered and if appropriate implemented by Veolia. Where an alternative action to the provided recommendation is adopted, this should be documented and assessed at the subsequent IEA.

1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) has been engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Wetherill Park Resource recovery Facility (WPRRF). The IEA was undertaken between June 2023 and July 2023. This document outlines the method, findings, and recommendations of the 2020 IEA undertaken at the WPRRF.

1.1 Background

Veolia operates the WPRRF at 20 Davis Road, Wetherill Park, New South Wales (the site). The site operates under Development Consent (SSD 7267) and Environment Protection Licence (EPL 4548). The site is approved for the following waste handling activities:

- 140,000 tonnes per annum (tpa) of general solid waste (putrescible)
- 90,000 tpa of general solid waste (non-putrescible)
- 10 m³ of asbestos waste per week

The site consists of the following:

- Transfer building including waste compactors,
- Site water containment
- Odour controls
- A stormwater detention system
 - Bitumen hardstand areas surrounding the site that drain to the water detention system
- Office building and amenities
- Entrance/exit connecting to Davis Street
- Weighbridge office and weighbridge

1.2 IEA Team

The IEA team members are listed in **Table 1**. In accordance with Condition C12 of SSD 7267, the IEA team has been approved by the Director-General (**Appendix A**). The auditors confirm their independence, and the signed Independent Environmental Audit Declaration Form has been provided in **Appendix B**.

Table 1. IEA Team

Person	Role	Years' Experience	Qualifications
Kirsty Douglas	Lead Auditor	17	Lead auditor (Exemplar Global, No. 210439), BSci (Conservation Biology and Ecology), IAP2 Australasia Certificate in Engagement
Chris Griffiths	Assistant Auditor	16	BSci (Environmental Management), Auditor Training (Lead Auditor)
Gabrielle Head	Assistant Auditor	1	BSci (Environmental Biology); BSci (Science in Information Technology); B. Creative Intelligence and Innovation

1.3 IEA Objectives

As per Condition C12 of SSD 7267 for the site, an IEA is required to be undertaken within one year of the commencement of operation, and every three years thereafter, to independently verify compliance of environmental obligations at the site.

The key objective of this IEA was to:

- Determine the status of recommendations from the previous IEA (Element Environment, 2021)
- Assess whether the site is operated in compliance with the approval conditions listed under the:
 - SSD 7267
 - EPL 4548
- Assess whether the site is being operated in accordance with current practice and standards, including but not limited to:
 - Waste management
 - Waste-water management and treatment
 - Odour management
 - Stormwater management
 - Noise mitigation
 - Hazardous chemical storage and handling
- Assess the overall environmental performance of the site and effects on the surrounding environment and sensitive receptors
- Review the adequacy and implementation of management plans developed in accordance with the approval conditions
- Provide recommendations for the overall improvement of environmental performance of the site

1.4 IEA Scope

The IEA scope included activities undertaken during the IEA period (November 2020 – July 2023) at the site in relation to the operation of the terminal with respect to the development consent (SSD7267), environmental protection licence (EPL 4548), Operational Environmental Management Plan (OEMP) and relevant environmental sub-plans.

1.5 IEA Period

Condition C12 of SSD 7267 stipulates the following audit frequency:

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

The initial IEA was completed in October 2020, therefore the audit period for this audit is between November 2020 to July 2023.

2 IEA METHOD

2.1 Method Development

The IEA method was developed with reference to:

- Independent Audit Post Approval Requirements (DPI&E, 2020)
- ISO 19011 Guidelines for Auditing Management Systems

2.2 IEA Program

The IEA was undertaken in accordance with the program provided in **Table 2**.

Table 2. IEA Program

Date	Task Description	Who
IEA Preparation		
20/06/23	Provision of IEA Plan to Veolia	Epic
09/06/23	Approval of the IEA team	DPE
20/06/23	Developed the IEA tools	Epic
20/06/23	Undertook the preliminary document review	Epic
IEA Phase		
05/07/23	Opening Meeting	Epic & Veolia
05/07/23	Site inspection	Epic & Veolia
05/07/23	IEA interviews	Epic & Veolia
05/07/23	Closing Meeting	Epic & Veolia
IEA Reporting		
19/07/23	Provision of additional evidence not obtained during the IEA phase.	Veolia
01/08/23	Prepare the draft IEA report	Epic
23/08/23	Issue the draft IEA report to Veolia	Epic
31/08/23	Veolia provides comments on draft IEA report	Veolia
08/09/23	Issue the final IEA report to Veolia	Epic

2.3 Pre-Audit Consultation

Upon engagement the IEA team held a kick-off meeting on the 19 June 2023 with Veolia to discuss the IEA process, expectations, and detail information requirements prior to undertaking the IEA.

2.4 IEA Tools

The following IEA tools were used during the IEA. These tools assisted in defining the scope of the IEA, captured any issues identified during the IEA and allowed for the discussion of potential recommendations on how these items can be rectified. The tools included:

- IEA plan (**Appendix C**)
- Opening meeting agenda and minutes
- Independent environmental audit table (**Appendix D**) and interview questions

2.5 IEA Criteria

The IEA criteria are the requirements against which the site was assessed. The IEA criteria for the site included:

- Findings of the 2020 IEA (Element Environment, 2021)
- Conditions of SSD 7267
- Conditions of EPL 4548

- Requirements within the Wetherill Park resource Recovery Facility Operational Environmental Management Plan (the OEMP) and the following sub-plans:
 - Traffic management plan (TMP)
 - Odour management plan (NMP)
 - Emergency response plan (ERP)
 - Flood emergency response plan (FERP)

2.6 IEA Compliance Rating

The compliance assessment ratings used in the IEA assessment are outlined in **Table 3**.

Table 3. IEA Ratings

IEA Rating	Abbreviation	Definition
Compliant	C	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or management plan requirement have been complied/conformed with within the scope of the IEA.
Non-compliant	NC	The auditor has determined that one or more specific elements of the conditions or management plan requirements have not been complied/conformed with within the scope of the IEA.
Opportunity For Improvement	OFI	Compliant, however possible improvements identified.
Not Triggered	NT	A condition or requirement has an activation or timing trigger that has not been met during the defined IEA period (it may be a retrospective or future requirement), therefore an assessment of compliance/conformance is not relevant.

2.7 IEA Interviews

A number of key staff were interviewed during the IEA, including:

- Environmental Advisor - Dora Ambrosi-Wall
- Site Manager - Steve Buchanan
- Site Supervisor - Nick Montegudo
- Safety Advisor - Ken Dekok

Interviews were undertaken in person at the Veolia WPRRF site.

2.8 Site Inspections

A site inspection was undertaken on the same day as the audit interviews to visually verify aspects discussed and those items that could not be confirmed through the initial document review. Weather on the day of the site inspection was overcast, with a low of 6.2°C with a high of 16.6°C (BOM, 2022 – Prospect Reservoir weather station). Approximately 2.0 mm of rain fell on the day of inspection at the Prospect Reservoir weather station.

The IEA team were escorted by Veolia representatives during the site inspection. The IEA team were provided unrestricted access to the site to verify compliance.

2.9 IEA Evidence

A comprehensive suite of evidence and material was provided by Veolia to verify the findings of the IEA. The list of material provided and reviewed during the IEA included:

- The OEMP, including Sub-plans
- 2021 – 2022 Annual Environmental Management Report (AEMR)
- 2020 – 2022 Annual Returns
- 2020 Odour Audit
- Weekly Odour Monitoring Forms
- Wetherill Park Independent Audit Final Report 2021
- Waste Records
 - Waste and Resource Reporting Tool (WARRP)/ Mandalay reports
- Consent to discharge industrial wastewater (Sydney Water, 2021)
 - Trade waste report
 - Trade waste – laboratory certificates of analysis
- Noise assessments (2021 and 2023)
- Complaints register
- Vermin and pest control receipts (Rentokil 2020 – 2023)
- EQS inspection checklists
 - Inspection schedules (weekly and monthly)
- 6 monthly spill kit checklist
- Compliance evaluation forms
 - Internal due diligence reviews – environmental risks
- Photo evidence of wall cleaning
- Weather station service records

All other evidence noted during the IEA not listed above was observed on the WPRRF website or visually observed during the IEA interviews.

3 IEA FINDINGS

3.1 Overall IEA Results

A total of 149 individual requirements / conditions were audited across the IEA criteria, with 44 requirements / conditions determined to be not triggered at the time of the IEA. Of the applicable requirements and conditions, Veolia demonstrated compliance against 90% of the IEA criteria. The site was identified as being non-compliant with a total of ten requirements / conditions.

The overall IEA results have been shown in **Figure 1**.

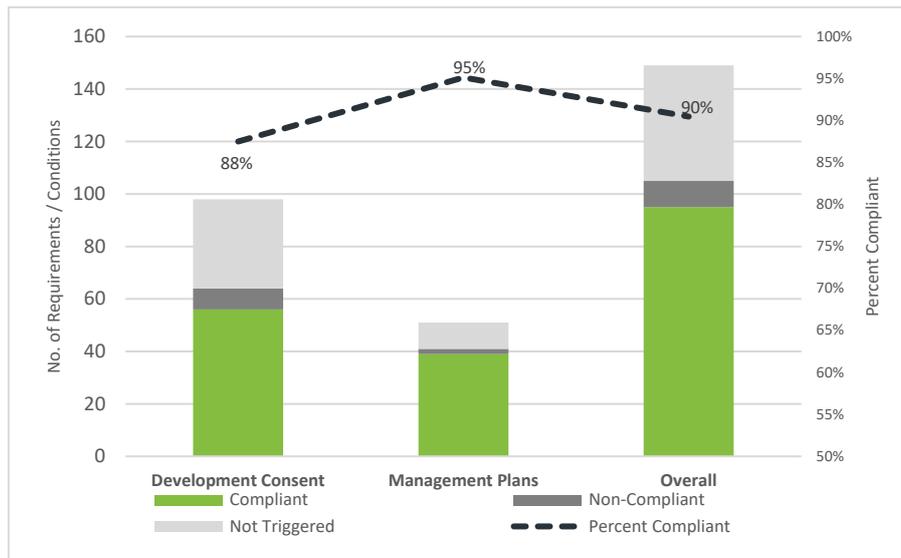


Figure 1. Overall IEA results

The subsequent sections will provide a summary of the findings with the complete independent IEA table provided in **Appendix D**.

3.1.1 Positive Observations

- A number of positive observations were noted during the IEA including:
- Record management was of a high level and although there had been a recent change of staff, all site personnel worked together efficiently to identify and located evidence required
- No areas of concern were observed during the site inspection. Notably:
 - A high level of environmental governance was demonstrated, staff interviewed during the site inspection were aware of and understood environmental management plans and procedures relevant to their roles and responsibilities
 - The site was well maintained (inside the tipping floor shed and the site grounds) and no evidence of dust nuisance or waste migrating offsite was observed (**Appendix E- Plates 2 - 5**)
 - The site was observed to be regularly cleaned/tidied up during the day at the time of the site inspection (**Appendix E- Plate 6**)
 - Facilities were provided for the separation of waste (**Appendix E- Plates 7-8**)
 - Plant and equipment service records were maintained on site and up to date



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

No agency notices, orders, penalty notices and prosecutions were noted for the site during the IEA period.

3.3 Status of 2020 IEA Findings

The 2020 IEA identified ten recommendations related to eight NCs and two opportunities for improvement. Of the ten recommendations, the 2023 IEA identified seven that were completely addressed and three that were open that had evidence of substantial progress.

The status of each of the 2020 IEA recommendations is provided in **Table 4**.

Table 4. Status of 2020 IEA Recommendations

Reference	Recommendation (2020 IEA)	Findings (2023 IEA)	Status
Development Consent (SSD 7267)			
A27	An interim Occupation Certificate has been issued and submitted to Council.	Site personnel confirmed that an interim Occupation Certificate has been issued, however stage 2 construction is currently going through a modification (expected to be complete by end of year) and a final certificate will be issued upon completion of stage 2 construction works	Open, evidence of substantial progress was observed, however will remain open until final occupation certificate is received.
A28	The surrender of preexisting consents has been issued by FCC.	The surrender of all pre-existing development consents occurred outside of this audit period. The previous IEA identified this as a non-compliance - although the consents had been surrendered, it occurred after the commencement of stage 1 operations. This non-compliance is considered closed for the purpose of this audit	Addressed and no further action required
B5	SUEZ should review the stormwater management system for the site; if a first flush system is not required then a modification should be submitted.	Site personnel confirmed that the installation of the first flush system is still in progress. Evidence of it being ordered was sighted during the audit interviews as well as confirmation that is expected to be installed by the end of July 2023.	Open, evidence of progress was observed
B30	The Operational Traffic Management Plan has been approved by DPIE.	The Traffic Management Plan was approved outside of this audit period. The plan demonstrates compliance with the requirements of this condition. It is noted that if additional carparks are to be installed and upon approval of the stage 2 Modification, the TMP will be required to be updated. This NC occurred in the past and was an administrative NC with no action required.	Addressed and no further action required

Reference	Recommendation (2020 IEA)	Findings (2023 IEA)	Status
B42	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.	Waste vehicles entering the site were observed to be enclosed. The site was being cleaned at the time of the site inspection.	Addressed and no further action required
C4	The Operational Environmental Management Plan has been approved by DPIE.	The OEMP is published and addresses the requirements of this condition. Th NC identified in the 2020 audit was administrative with no action required	Addressed and no further action required
C8	SUEZ should prepare an Annual Review which covers the period 11/09/2019 to 10/09/2020.	An independent environmental audit was completed by Element Environmental and covered the period between December 2019-October 2020	Addressed and no further action required
C14	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).	Documents required under this condition are published on the website. Note: documents are currently being transferred over to a new system, therefore only the most current versions of management plans, monitoring documents etc are currently published.	Addressed and no further action required
B14	Re-commission an odour audit after the commencement of Stage 2 operations.	Odour audit completed in May 2020.	Addressed and no further action required
Environmental Protection Licence 4548			
R1.1	Regularly review the information available on the website to identify if any new information needs to be uploaded.	Information continuing to be uploaded. This will be ongoing for the duration of the life if operations.	Open, evidence of progress was observed

3.4 Development Consent

Veolia was found to be 88% compliant with the conditions of the SSD 7267. Notable observations of compliance included:

- Monitoring required by the conditions of consent were up to date and complete
- Monitoring reports, IEA reports, AEMRs and the OEMP and sub plans were available on the Veolia website for WPRRF
- Key equipment maintenance records were complete
- The required waste records were maintained and up to date

A total of four OFIs and eight NCs were identified during the IEA, of which two NCs remain open from the 2020 IEA (**Table 5**).

Recommendations to address the non-compliances and other identified opportunities for improvement have been provided in **Section 4**.

Table 5. IEA Findings – Development Consent SSD 7267

Condition	Requirement	Compliance Rating	IEA Finding
A27 ¹	<p>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:</p> <ul style="list-style-type: none"> (a) additional pavement and hardstand; (b) stormwater system; (c) fire safety system upgrade; and (d) temporary perimeter access road. 	NC	<p>Site personnel confirmed that an interim Occupation Certificate has been issued, however stage 2 construction is currently going through a modification (expected to be complete by end of year) and a final certificate will be issued upon completion of stage 2.</p>
B5 ¹	<p>The Applicant must ensure the first flush detention tank is bunded in accordance with:</p> <ul style="list-style-type: none"> (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>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>	NC	<p>Site personnel confirmed that the installation of the first flush system is still in progress. Evidence of it being ordered was sighted during the audit interviews as well as confirmation that is expected to be installed by the end of July 2023.</p>
A1	<p>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.</p>	NC	<p>The Applicant generally demonstrated compliance with the requirements of this consent with the exception of non-conformances identified for conditions B4, B5 and B23(b).</p>
A2	<p>The Applicant, in acting on this consent, must carry out the Development in accordance with the:</p> <ul style="list-style-type: none"> (a) 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. 	NC	<p>The Applicant generally demonstrated compliance with the requirements of this consent with the exception of non-conformances identified for conditions A1, A8, A9, A27, B4, B5, B23(b), B39 and B41.</p>

Condition	Requirement	Compliance Rating	IEA Finding
A8	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.	NC	Waste is generally processed and remove offsite within 24 hours, however one exceedance of the waste limit occurred on 8 March 2022 as a result of significant rainfall resulting in several other facilities diverting waste to the Wetherill Facility. EPA were notified and to prevent a reoccurrence, Veolia reported that material levels on site would be maintained as low as reasonably practicable in preparation for future flood events. Material on site was transported to alternate licence facilities and landfill on 9 March 2022. EPA notified and the exceedance was also reported in the Annual Return.
A9	The Applicant must not store general solid waste (putrescible) at the site for more than 24 hours from the time of receipt.	NC	Site personnel confirmed that the majority of the time waste is cleared within 24 hours, however due to a change in operational hours, the site is closed between 4pm Saturday to 10PM on a Sunday, therefore if waste is received on a Saturday it remains on site for more than 24 hours (i.e. not removed until Monday morning).
B4	The Applicant shall ensure all wastewater is discharged to sewer in accordance with a Trade Waste Agreement with Sydney Water.	NC	All water onsite goes through trade waste system. A review of a random selection of samples (lab analysis) suggest that the water being released through trade waste is within the requirement of the consent to discharge with the exception of one release (sample collected 2/02/2022) which contained elevated levels of sulfate and pH.
B23(b)	The Applicant must design, install and operate a stormwater management system for the Development. The system must: (b) be generally in accordance with the conceptual design in the EIS and applicable Australian Standards;	NC	Site personnel confirmed that all water onsite goes through a treatment system and is released to trade waste as per the requirements of the discharge consent. The system has a keystone valve that can be turned off to prevent release to stormwater. The valve undergoes annual inspection (Matic plumbing). Observations made during the site inspection confirmed a bund is present around the site. Condition B5 requires a first flush system to be installed. The EIS also identifies a first flush system to be installed, which has not been installed to date (also refer to the findings for condition B5).
B39	The Applicant must 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.	OFI	Oils were observed to be stored inside the shed on banded pallets. One 5L container of coolant was observed to be located outside of the banded pallets, however it was on a sealed area. Spill trays were also observed onsite, however general rubbish was also observed in these trays

Condition	Requirement	Compliance Rating	IEA Finding
	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.		
B41	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly In accordance with:</p> <p>(d) all relevant Australian Standards;</p> <p>(e) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>(f) 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>	OFI	Oils were observed to be stored inside the shed on banded pallets. One 5L container of coolant was observed to be located outside of the banded pallets, however it was on a sealed area.
C11	The Applicant must provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	OFI	<p>At the time of this IEA the following documents are published on the website:</p> <ul style="list-style-type: none"> • 2020 IEA • Annual Returns • Annual Environmental Management Review • Odour monitoring • Noise assessments • Complaints register <p>It was noted that only the most recent reports/monitoring data was published, as per the requirements of the condition, all historical documents, monitoring data etc should be published.</p>
C14	<p>The Applicant must:</p> <p>(a) make copies of the following publicly available on its website:</p> <p>i. the documents referred to in Condition A2;</p> <p>ii. all current statutory approvals for the Development;</p> <p>iii. all approved strategies, plans and programs required under the conditions of this consent;</p> <p>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;</p> <p>v. a complaint register updated on a monthly basis;</p>	OFI	<p>The following documents are published on the website:</p> <p>a)ii Approvals / Development consents</p> <p>iii) Management Plans</p> <ul style="list-style-type: none"> • Operational Environmental Management Plan (OEMP) • Construction Environmental Management Plan (CEMP) • Odour Management Plan (OMP) • Traffic Management Plan (TMP) • Emergency Response Plan (ERP) <p>iv) Monitoring results:</p>

Condition	Requirement	Compliance Rating	IEA Finding
	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 this information up to date, to the satisfaction of the Secretary.		<ul style="list-style-type: none"> • Noise Assessment 2023 • Odour Audit 2020 v) Complaints register for M and June 2023 vi) Annual Environmental Management Review 2021 -2022 vii) 2020 Independent Environmental Audit Viii) Copies of all approvals relevant to the site It was noted that only the most recent reports/monitoring data was published, as per the requirements of the condition, all historical documents, monitoring data etc should be published .

¹Non-conformances that were identified in the 2020 audit that remain outstanding.

3.5 Environmental Protection Licence

Veolia was found to be 95% compliant with the conditions of the EPL 4548. Notable observations of compliance included:

- No evidence of unauthorised environmental harm was observed during the audit
- Site personnel demonstrated knowledge and understanding of their environmental obligations
- Environmental monitoring and waste records were up to date and maintained

A total of two NCs were identified during the IEA (**Table 6**).

Table 6. IEA Findings – EPL 4548

Condition	Requirement	Compliance Rating	IEA Finding
L2.2:	The authorised amount of waste permitted on the premises cannot exceed 2,400 tonnes at any one time.	NC	An exceedance of the waste limit occurred on 8 March 2022 as a result of significant rainfall resulting in several other facilities diverting waste to the Wetherill Facility. Material on site was transported to alternate licence facilities and landfill on 9 March 2022. EPA notified and the exceedance was also reported in the Annual Return.
O6.3:	The licensee must remove all general solid waste (putrescible) within 24 hours of it being received at the Premises.	NC	Site personnel confirmed that the majority of the time waste is cleared within 24 hours, however due to a change in operational hours, the site is closed between 4pm Saturday to 10pm on a Sunday, therefore if waste is received on a Saturday it remains on site for more than 24 hours (i.e.. not removed until Monday morning)

3.6 Operational Environmental Management Plan and Associated Sub-Plans

The development consent includes conditions that outlines the items that must be addressed in the environmental management plans as follows:

- **Condition B14:** Odour Management Plan (OMP)
- **Condition B20:** Flood Emergency Response Plan (FERP)
- **Condition B30:** Operational Traffic Management Plan (OTMP)
- **Condition C1:** Construction Environmental Management Plan (CEMP)
- **Condition C4:** Operational Environmental Management Plan (OEMP)

A review of these environmental management plans confirmed that they had been developed in accordance with the requirements outlined in the conditions of SSD7267. It was identified during the audit that these management plans were in the process of being reviewed.

3.6.1 Odour Management Plan

Condition B14 of SSD 7267 outlines the items that the OMP must include. A review of the adequacy of the OMP (version 2 - Addendum 1, September 2021) confirmed the plan:

- Was prepared by a suitably qualified and experienced person
- Includes management of the development
- Includes an odour monitoring program
- Includes incident management and reporting requirements (including community engagement)
- A contingency plan for possible unpredicted events and the operational controls to mitigate risks

3.6.2 Flood Emergency Response Plan

Condition B20 of SSD 7267 outlines the items that the FERP must include. The FERP has been replaced with an Emergency Response Plan (ERP) that includes an action plan to be followed in the event of a flood. A review of the adequacy of the flood action plan in the ERP (Version 8, July 2021) confirmed the plan includes an:

- Alert phase (prior to a flood event)
- Response phase (during the flood event)
- Recovery phase (after the flood event)

The FERP is also included as Appendix 9 of the OEMP.

3.6.3 Operational Traffic Management Plan

Condition B30 of SSD 7267 outlines the items that the OTMP must include. A review of the adequacy of the OTMP (version 2, October 2016) confirmed the plan:

- Was prepared by a suitably qualified and experienced person
- Includes measures to be implemented on site for safety
- Identifies vehicle and pedestrian routes
- Parking areas (light vehicle and trucks)
- Evacuation routes
- Includes the roles and responsibilities

It was noted during the audit interviews that there is potential for additional carparks to be installed as part of stage 2 Modification. Site personnel were reminded that if additional carparks are installed, the OTMP will be required to be reviewed and updated to reflect these (and any other) changes.

3.6.4 Construction Environmental Management Plan

This CEMP was not reviewed as the site was operational. Site personnel were reminded that a CEMP specific to stage 2 Modification will be required to be developed prior to commencement of stage 2 construction.

3.6.5 Operational Environmental Management Plan

Condition C4 of SSD 7267 outlines the items that the OEMP must include. A review of the adequacy of the OEMP (version 3, November 2019) confirmed the plan:

- Was prepared by a suitably qualified and experienced person
- Includes management of the development
- Identifies relevant legislative requirements
- Includes the roles and responsibilities of all key personnel involved in the environmental management of the site
- Includes incident management and reporting requirements
- Includes community complaints management
- Appropriate mitigation measures

3.7 Environmental Performance

Monitoring records were observed for the IEA period, demonstrating a high level of environmental performance across the site. This was also verified during the site inspection.

3.8 Complaints

The EPA received odour complaints allegedly coming from the facility in January 2022. SUEZ (site operators at the time of the complaint) undertook an investigation and a response was provided to the EPA confirming that the source of the odour complaint was not a result of the sites operations. The investigation identified:

- No putrescible waste was received during the complaint period
- No activities occurred outside of normal operations
- All odour management measures were in place

A letter was sent to the EPA requesting whether they had any input into the scope of this IEA. The EPA responded (4 July 2023) confirming that there had been no recent reported pollution notification or complaints directly associated with the development.

3.9 Incidents

A fire occurred on the premises 6 April 2022 and was reported to the EPA. The EPA confirmed that the fire did not result in regulatory action, however they reminded Veolia of its obligation under the *Protection of the Environment Operations (General) Regulation 2021* that the Pollution Incident Response Management Plan (PIRMP) for the Premises is to be tested within one month of any pollution incident occurring.

Site personnel confirmed that the PIRMP was tested after the incident occurred, however no evidence of this was able to be provided at the time of the audit.

There were two non-compliances that were reported to the EPA in the 2021 – 2022 annual reporting period:

- An exceedance of the authorised amount of waste permitted on site
- Waste remaining on site for greater than 24 hours

The non-compliances were a result of restricted access to Sydney landfills during ongoing wet weather and flood events in March 2022. To prevent recurrence of the non-compliances, Veolia reported that it would maintain material levels on site as low as reasonably practicable in preparation for potential future flood events.

4 RECOMMENDED ACTIONS

4.1 Non-compliances

A total of ten conditions (eight against the development consent and two against the EPL) were identified as NCs during the IEA. Recommended actions to the address each of these matters has been provided in **Table 7**. The complete action plan, including consideration by Veolia has been provided in **Appendix F**.

Implementation of the action plan should be verified as part of the subsequent IEA.

Table 7. Recommendations to Resolve Identified NCs

Unique Identification ¹	Relevant Condition / Section	Recommended Actions	Proponents Proposed Action	Due Date
NC-01	A1 General Performance 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.	Refer to NC-05 and NC-06 for recommended actions. Note: The Applicant generally demonstrated compliance with the requirements of this consent with the exception of non-conformances identified for conditions B4, B5 and B23(b).	Refer to NC-05 and NC-06 for Proponents proposed actions	Refer to NC-05 and NC-06
	A2 General Performance 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.	Implement recommended actions for all non-conformances identified in this action plan. Note: The Applicant generally demonstrated compliance with the requirements of this consent with the exception of non-conformances identified for conditions A1, A8, A9, A27, B4, B5, B23(b) and B39.	Refer to the Proponents proposed actions for all non-conformances.	Ongoing
NC-02	A8 Waste Management 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	The applicant is to continue to monitor weather events and ensure waste that is accepted, processed	A new weather station has been installed. Weather will continue to be	Ongoing

Unique Identification ¹	Relevant Condition / Section	Recommended Actions	Proponents Proposed Action	Due Date
	approval from the Planning Secretary in consultation with the EPA. EPL – L2.2 Waste The authorised amount of waste permitted on the premises cannot exceed 2,400 tonnes at any one time.	onsite does not exceed the limits as outlined in this condition. Note: This non-conformance was a result of a weather event outside of the facility's control and was reported to the EPA. This non-conformance did not result in a penalty notice.	monitored and in the event significant rainfall is predicted: <ul style="list-style-type: none">material levels will be maintained on site as low as reasonably practicablewaste will be diverted to other sites if material levels are approaching capacity	
NC-03	A9 Waste Management The Applicant must not store general solid waste (putrescible) at the site for more than 24 hours from the time of receipt. EPL O6.3 Waste Management The licensee must remove all general solid waste (putrescible) within 24 hours of it being received at the Premises.	Prepare and submit a modification to the consent requesting a change in wording to this condition to reflect the facilities operating hours.	A modification of the existing consent will be considered.	December 2023
NC-04	A27 Certification 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.	Continue to progress with the modification for stage 2. Once approved and stage 2 works are complete, obtain final certification and submit to the Department.	Modification 2 has been submitted and is currently going through the approval stage with the Department	December 2023
NC-05	B4 Wastewater The Applicant shall ensure all wastewater is discharged to sewer in accordance with a Trade Waste Agreement with Sydney Water.	No action required. Non-conformance is reported to Sydney Water and it determines charges to trade wastewater as opposed to an infringement being issued.	Wastewater will continue to be monitored and reported as required by the Trade Waste Agreement with Sydney Water	Ongoing
NC-06	B5 Wastewater The Applicant must ensure the first flush detention tank is bunded in accordance with: (a) all relevant Australian Standards;	Install the first flush system and provide evidence once works are complete and that it has been installed/certified by a suitably qualified person.	A work order has been submitted for the installation of the first flush system.	December 2023

Unique Identification ¹	Relevant Condition / Section	Recommended Actions	Proponents Proposed Action	Due Date
	<p>(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>(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> <hr/> <p>B23(b) Stormwater Management System The Applicant must design, install and operate a stormwater management system for the Development. The system must:</p> <p>(b) be generally in accordance with the conceptual design in the EIS and applicable Australian Standards;</p>			

¹Where identified non-conformances resulted in the same recommended action, they were given the same unique identifier.

4.2 Opportunities for Improvement

A total of five opportunities for improvement were identified during the IEA. These opportunities for improvement have been listed as recommendations in **Table 8**. The complete action plan, including consideration by Veolia has been provided in **Appendix F**.

Implementation of the action plan should be verified as part of the subsequent IEA.

Table 8. Recommendations for Opportunities for Improvement

Unique Identification ¹	Relevant Condition / Section	Recommended Actions	Proponents Proposed Action	Due Date
OFI-01	<p>B39 Hazards and Risk The Applicant must 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. 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>	Undertake refresher training / toolbox meeting with all site personnel to remind them of the requirements for the storage of all chemicals, fuels and oils on site in accordance with the relevant Australian Standards and EPA guidelines.	Staff will be reminded of the storage of all chemicals, fuels and oils on site. Regular sites inspections will continue to ensure appropriate storage and handling of chemicals, fuels and oils	December 2023
	<p>B41 Hazards and Risk Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly In accordance with: (d) all relevant Australian Standards; (e) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (f) 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</p>			

Unique Identification ¹	Relevant Condition / Section	Recommended Actions	Proponents Proposed Action	Due Date
	stringent requirement must prevail to the extent of the inconsistency.			
OFI-02	<p>C11 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.</p> <p>C14 Access to Information The Applicant must:</p> <ul style="list-style-type: none"> (a) make copies of the following publicly available on its website: <ul style="list-style-type: none"> i. 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 this information up to date, to the satisfaction of the Secretary. 	Ensure all historical documents, reports and monitoring data for the site operations are published on the website as per the requirement of this condition.	Migration of all historical documentation to the new document control system will continue. All documents required to be published on the sites website will continue to be uploaded as required.	December 2023

Unique Identification ¹	Relevant Condition / Section	Recommended Actions	Proponents Proposed Action	Due Date
OFI-03	EPL O4.1 Emergency Response The licensee must maintain an emergency response plan which documents the procedures to deal with all types of incidents (e.g. spill, explosions or fire) that may occur at the premises or outside of the premises (e.g. during transfer) which are likely to cause harm to the environment.	Ensure evidence of the PIRMP test is captured in a debrief report or similar that outlines the drill/test undertaken, persons involved, learnings and actions to be implemented.	Evidence of PRIMP tests will be documented and maintained in the document control system. Any learning will be shared with site personnel and where appropriate, other sites. If required the PIRMP will be updated based on the outcomes of the test.	Ongoing

¹Where identified opportunity for improvement resulted in the same recommendation, they were given the same unique identifier

5 CONCLUSION

This document outlines the method, findings, and recommendations of the 2023 IEA undertaken by Epic at the WPRRF. The IEA was undertaken in accordance with Condition C12 of the Development Consent (SSD 7267).

The IEA was conducted to:

- Assess the level of compliance against the conditions of approvals:
 - Development consent (SSD 7267)
 - Environmental Protection Licence (EPL 4548)
- Assess whether current practices and standards are being implemented
- Evaluate the overall environmental performance of the site
- Assess the adequacy and implementation of management plans
- Identify recommendations for the overall improvement of environmental performance

The IEA was undertaken between June and August 2023 and captured evidence for the period November 2020 to July 2023. The IEA criteria used for the IEA, included:

- Findings of the 2020 IEA (Element Environmental, 2021)
- Conditions of SS 7267
- Conditions of EPL 4548,
- The OEMP and the associated sub-plans.

A total of 149 individual requirements / conditions were audited across the IEA criteria, with 44 requirements determined to not be triggered at the time of IEA. The site was identified as being non-compliant with a total of ten requirements / conditions. (two remain open from the 2020). Veolia demonstrated compliance against 90% the IEA criteria.

The key non-compliances identified during the IEA include:

- Exceedance of waste limits on site
 - Noting this was the result of several waste facilities diverting waste to the Wetherill Park Facility due to a significant rainfall event
- Waste remaining on site for greater than 24 hours
 - Noting a change in operating hours (the site no longer operates seven days a week)
- A first flush system had not been installed as required by the development consent conditions
- Exceedance of water quality limits as outlined in the consent to discharge (trade waste agreement with Sydney Water)
- Final occupation certificate yet to be obtained (interim certificate has been received)

Recommendations to assist Veolia in addressing the findings of this IEA have been provided. All recommendations should be considered and if appropriate implemented by Veolia. Where an alternative action to the provided recommendation is adopted, this should be documented and assessed at the subsequent IEA.

Finally, the IEA team would like to thank all the IEA participants for their time, assistance, and cooperation in undertaking this audit.



6 REFERENCES

Department of Planning, Industry and the Environment, 2020, Requirement 2, Independent Audit - Post Approval Requirements, Sydney, New South Wales

Independent Environmental Audit – Wetherill Park Waste Transfer Station, State Significant Development (Element Environmental, 2021)

International Organization for Standardization, 2018, ISO 19011:2018 Guidelines For Auditing Management Systems

7 LIMITATIONS AND DISCLAIMER

Epic Environmental Pty Ltd (Epic) has prepared the following report for the exclusive benefit of Veolia Australia and New Zealand (Client) and for the singular purpose of detailing the findings of the 2022 Independent Environmental Audit of the Wetherill Park Resource Recovery Facility located in Wetherill Park NSW. All interpretations, finding or recommendations outlined in this report should be read and relied upon only in the context of the report as a whole.

The following report cannot be relied upon for any other purpose, at any other location or for the benefit of any other person, without the prior written consent of Epic. Except with Epic's prior written consent, this report may not be:

- a. to any other person, whether in whole or in part;
- b. used or relied upon by any other party; or
- c. filed with any Governmental agency or other person or quoted or referred to in any public document.

This report has been prepared based on information provided by the Client and other parties. In preparing this report Epic:

- a. presumed the accuracy of the information provided by the Client (including its representatives);
- b. has not undertaken any verification to the accuracy or reliability included in this information (with the exception where such verification formed part of the scope of works);
- c. has not undertaken any independent investigations or enquiries outside the scope of works with respect to information provided for this report; and
- d. provides no warranty or guarantee, expressed or implied, as to the accuracy or reliability of the information provided in this report.

In recognition of the limited use of this report, the Client agrees that, to the maximum extent permitted by law, Epic (including its representatives and related entities) is not liable for any losses, claims, costs, expenses, damages (whether pursuant to statute, in contract or tort, for negligence or otherwise) suffered or incurred by the Client or any third party as a result of the information, findings, opinions, estimates, recommendations and conclusions provided in this report.

Without limiting the above, Epic (including its representatives and related entities) is not liable, in any way whatsoever:

- a. for the use or reliance of this report for any purpose other than that for which it has been prepared;
- b. for any use or reliance upon this report by any person other than the Client;
- c. where another person has a different interpretation of the same information contained in the report;
- d. for any consequential or indirect losses, or for loss of profit or goodwill or any loss or corruption of any data, database or software.

If a section of this disclaimer is determined by any court or other competent authority to be unlawful and/or unenforceable, the other sections of this disclaimer continue in effect. Where further information becomes available, or additional assumptions need to be made, Epic reserves its right to amend this report, but is not obliged to do so.



Project name: **Independent Environmental Audit - Wetherill Park Resource Recovery Facility**

APPENDIX A PLANNING SECRETARY IEA TEAM APPROVAL

Kelly Gee
VEOLIA ENVIRONMENTAL SERVICES (AUSTRALIA) PTY LTD
3 RIDER BOULEVARD
RHODES NSW 2138

09/06/2023

Dear Kelly Gee

Wetherill Park Waste Transfer (SSD-7267) Independent Auditor Endorsement

I refer to your request (SSD-7267-PA-8) for the Planning Secretary to endorse the appointment of a suitably qualified and experienced team of experts to conduct an Independent Environmental Audit (**IEA**) for the Wetherill Park Waste Transfer development SSD-7267, as modified (the **consent**).

The Department of Planning and Environment (the **department**) has reviewed the nominations and information you have provided and is satisfied that the nominated experts are suitably qualified and experienced.

Consequently, as nominee of the Planning Secretary I endorse the appointment of the following audit team from Epic Environmental Pty Ltd:

- Kirsty Douglas as lead auditor;
- Chris Griffiths as assistance auditor; and
- Gabrielle Head as assistant auditor

to undertake the Independent Audit for the development, in accordance with Schedule 2, Part C, Condition C12 of the consent and the department's *Independent Audit Post Approval Requirements (2020)* (**IAPAR**).

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the IAPAR. 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.

Should you wish to discuss the matter further, please contact Maria Divis, Senior Compliance Officer on 02 8275 1156 or compliance@planning.nsw.gov.au.

Department of Planning and Environment



Yours sincerely

A handwritten signature in blue ink, appearing to read "Julia Pope".

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary



Project name: **Independent Environmental Audit - Wetherill Park Resource Recovery Facility**

APPENDIX B INDEPENDENT AUDITOR DECLARATION FORM

Independent Audit Report Declaration Form	
Project Name	Wetherill Park Resource Recovery Facility– Independent Environmental Audit
Consent Number	SSD 7267
Description of Project	The Waste Transfer Terminal is licensed to accept general solid wastes (both putrescible and non-putrescible and asbestos).
Project Address	20 Davis Road, Wetherill Park, NSW 2164
Proponent	Veolia Australia and New Zealand
Title of Audit	Independent Environmental Audit
Date	31/08/2023

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. 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;
- vi. 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;
- vii. 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
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a. Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b. The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading

Name of Auditor	Kirsty Douglas
Signature	
Qualification	Lead Auditor (Exemplar Global, No. 210439), BEnvSci, Cert IAP2 Australasia (Engagement)
Company	Epic Environmental Pty Ltd
Company Address	Suite 5, Level 9, 189 Kent Street, Sydney, NSW, 2000

Independent Audit Report Declaration Form	
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Consent Number	SSD 7267
Description of Project	The Waste Transfer Terminal is licensed to accept general solid wastes (both putrescible and non-putrescible and asbestos).
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Proponent	Veolia Australia and New Zealand
Title of Audit	Independent Environmental Audit
Date	31/08/2023

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. 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;
- vi. 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;
- vii. 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
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- c. Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- d. The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading

Name of Auditor	Chris Griffiths
Signature	
Qualification	Lead Auditor (BSI Training Academy), BSci (Environmental Management)
Company	Epic Environmental Pty Ltd
Company Address	Suite 5, Level 9, 189 Kent Street, Sydney, NSW, 2000



Project name: **Independent Environmental Audit - Wetherill Park Resource Recovery Facility**

APPENDIX C IEA PLAN



Audit Plan

**Veolia Australia and New Zealand
Veolia -Wetherill Park Resource Recovery Facility-IEA 2023
SAA230015.01
19 June 2023**

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DOCUMENT CONTROL

Revision	Revision date	Revision details	Author	Editorial review	Technical review	Approver
A	12/06/2023	Draft for Internal Review	KD	CG	CG	KD
B	19/06/2023	Draft for Client Review	KD	CG	CG	KD

DISTRIBUTION

Revision	Revision date	Issued to
B	19/06/2023	Dora Ambrosi-Wall, Veolia Australia and New Zealand
0	23/06/2023	Dora Ambrosi-Wall, Veolia Australia and New Zealand

DOCUMENT INFORMATION

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Project manager:	Kirsty Douglas
Client:	Veolia Australia and New Zealand
Document title:	Audit Plan
Project number:	SAA230015.01

1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) has been engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Wetherill Park Resource Recovery Facility (the site). This document provides a detailed IEA plan to guide the execution and reporting of the 2023 IEA. The IEA plan should be reviewed by Veolia and issued to relevant auditees prior to the execution of the IEA.

1.1 Purpose

As per Condition C12 of the State Significant Development Consent (SSD 7267) for the site, an IEA is required to be undertaken one year after the commencement of the operation and then three yearly thereafter to ensure ongoing compliance of environmental obligations at the site.

This IEA has been undertaken to address Condition C12 and evaluate compliance with the development consent conditions.

1.2 Scope

The IEA scope will include activities undertaken at the site, in relation to the operation of the Wetherill Resource Recovery Facility.

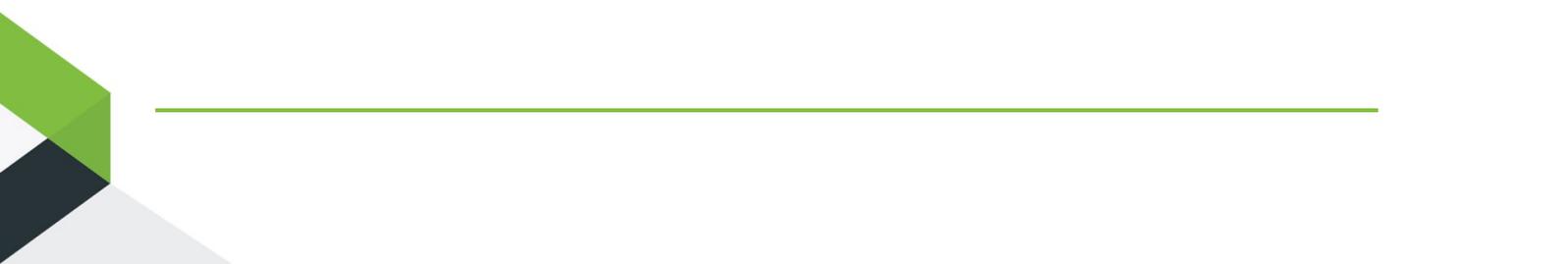
1.2.1 IEA Period

The IEA period will be between November 2020 and June 2023 with respect to the IEA criteria. Any activity or evidence that is not within this IEA period will not be included in the scope of the IEA.

1.3 Objectives

The key objectives of this IEA are to:

- Assess whether the site is operated in compliance with the approval conditions listed under:
 - SSD7267
 - Environment protection licence (EPL 4548)
- Assess whether the site is being operated in accordance with current practice and standards, including (but not limited to):
 - Waste management
 - Waste-water management and treatment
 - Odour management
 - Stormwater management
 - Noise mitigation
 - Hazardous chemical storage and handling
- Assess the overall environmental performance of the site and effects on the surrounding environment and sensitive receptors
- Review the adequacy and implementation of procedures and management plans developed in accordance with the approval conditions
- Provide recommendations for the overall improvement of environmental performance of the site



1.4 IEA Criteria

The IEA criteria are the requirements which the site will be assessed against. The IEA criteria for the site will be as follows:

- Findings of the 2020 IEA (Element Environmental, 29/07/2021)
- Conditions of the SSD7267
- Conditions of EPL 4548
- Commitments within the Wetherill Park Resource Recovery Facility Operational Environmental Management Plan (the OEMP) and the following sub-plans (where applicable):
 - Emergency response plan
 - Environmental monitoring program.
 - Dust management plan
 - Noise management plan
 - Odour management plan
 - Site contamination management plan
 - Stormwater management plan
 - Traffic management plan
 - Vermin and pest control plan
 - Waste management plan



2 IEA PLANNING

2.1 IEA Team

The IEA team members have been provided in **Table 1**. In accordance with Condition C12 a) of the development consent. The IEA team was approved by the Department of Environment and Planning on 9 June 2023.

Table 1: IEA Team

Person	Role	Years' Experience	Qualifications
Kirsty Douglas	Lead Auditor	17	Lead auditor (Exemplar Global, No. 210439), BSci (Conservation Biology and Ecology), IAP2 Australasia Certificate in Engagement
Chris Griffiths	Audit Assistant / Technical Reviewer	16	Lead Auditor (BSI Training Centre), DSci (Environmental Management)
Gabrielle Head	Audit Assistant	1	BSci (Environmental Biology), BSci (Information Technology), B.Creative Intelligence and Innovation

2.2 Veolia Staff Participation Requirements

2.2.1 Veolia Representative

Dora Ambrosi-Wall (Environmental Advisor) will act as Veolia's representative during the completion of this IEA. Anae will be responsible for organising meeting times, interview attendees and site inspection times.

2.2.2 Opening Meeting

The opening meeting will be held via teleconference. The meeting will be facilitated by Kirsty Douglas (Epic) and will be attended by Gabrielle Head (Epic) and select Veolia personnel. Veolia's representative will be responsible for organising suitable times for undertaking the opening meeting.

2.2.3 Interviews

A number of key staff will be required to be interviewed during the IEA. The team members that may be interviewed for the IEA will include:

- Environmental Advisor - Dora Ambrosi-Wall
- Environmental Manager - Kelly Gee
- Site Manager - Steve Buchanan
- Site Supervisor - Nick Montegudo

Interviews will be held on site at the time of the site inspection and via teleconference (where required). The Veolia IEA representative will be responsible for organising suitable times for undertaking the IEA interviews.

2.2.4 Site Inspection

Epic will undertake a site inspection to gain an understanding of the site operations and to visually verify compliance with certain conditions. It is understood a Veolia representative will consult with relevant parties to obtain access and will be available to escort the IEA team around relevant areas of the site.

2.2.5 Closing Meeting

Within a week of the site inspection a closing meeting will be held via teleconference. The meeting will be facilitated by Kirsty Douglas (Epic) and should be attended by Gabrielle Head (Epic) and all Veolia interviewees (where available). The Veolia IEA representative will be responsible for organising a suitable time for undertaking the closing meeting.

2.3 IEA Program

The proposed program to execute the IEA will be as detailed in **Table 2**. Should the precise time/dates require amending, these can be accommodated through discussions with the Lead Auditor.

Table 2: Proposed Program for the IEA

Proposed Time (NSW Time)	Proposed Date	Task Description	Locations	Who
Pre-IEA Preparations				
17:00	19/06/2023	Preparation and provision of IEA Plan to Veolia	Email	Epic
17:00	23/06/2023	Provision of management plans required for the IEA	Email	Veolia
09:00 – 17:00	19/06/2023 – 23/06/2023	Undertake a preliminary document review	Epic Offices	Epic
09:00 – 17:00	19/06/2023	Develop the IEA tools	Epic Offices	Epic
IEA Phase				
08:00	05/07/2023	Opening Meeting	Site / Teleconference	Epic & Veolia
09:00-16:00	05/07/2023	Site inspection	Site	Epic & Veolia
All day	05/07/2023	IEA Interviews	Site/ Teleconference	Epic & Veolia
10:00-10:30	14/07/2023	Closing Meeting	Teleconference	Epic & Veolia
IEA Reporting				
	10/07/2023	Provision of additional evidence not obtained during the IEA phase.	Email	Veolia
17:00	06/07/2023 – 14/07/2023	Prepare the draft IEA report	Epic Offices	Epic
17:00	17/07/2023	Issue the draft IEA report to Veolia	Email	Epic
17:00	24/07/2023	Veolia provides comments on draft IEA report	Email	Veolia
17:00	28/07/2023	Issue the final IEA report to Veolia	Email	Epic

2.4 Communications Plan

All communications regarding the planning of the IEA, information requirements and IEA execution will be either by email or phone to the Veolia IEA representative.

3 IEA EXECUTION

The following IEA methodology has been prepared with reference to:

- *Independent Audit – Post Approval Requirements* (NSW Department of Planning, Industry and Environment)
- *AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems*

3.1 IEA Scoring Criteria

The proposed compliance assessment rating to be used in the IEA are outlined in **Table 3** below.

Table 3: IEA Scoring Criteria

IEA Rating	Abbreviation	Definition
Compliant	C	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or management plan requirement have been complied with within the scope of the IEA.
Non-compliant	NC	The Auditor has determined that one or more specific elements of the conditions or management plan requirements have not been complied with within the scope of the IEA.
Not Triggered	NT	A condition or requirement has an activation or timing trigger that has not been met during the defined IEA period (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.
Opportunity For Improvement	OFI	Compliant, however possible improvements identified.

3.2 Develop Tools

The following tools will be prepared and utilised as part of the IEA program. These tools will assist in defining the scope of the IEA and will capture any issues identified during the IEA and allow discussion of potential recommendations on how these items can be rectified. The tools include:

- Opening meeting agenda and minutes
- Closing meeting agenda and minutes
- IEA checklist and interview questions

3.3 Undertaking the IEA

3.3.1 Document Review

With regards to the operations undertaken at the site, documentation provided by Veolia prior to the IEA, will be reviewed to determine preliminary findings. These findings will be clarified with the Veolia representatives during the IEA interviews and the site inspection (as required).

3.3.2 Conduct an Opening Meeting

An opening meeting will be conducted at the start of the IEA. The opening meeting will:

- Introduce the IEA team
- Confirm the IEA objectives, scope, and criteria
- Confirm communications channels
- Outline the IEA process and schedule
- Identify and set expectations and requirements
- Address Health and Safety requirements and confidentiality

Meeting minutes will be maintained and issued by Epic following the meeting.

3.3.3 Undertake Interviews

IEA interviews will be undertaken by the Lead Auditor via teleconference. Questions delivered during the IEA interviews will be based on condition or requirements applicable to the interviews area of responsibility. The Veolia representative will be responsible for scheduling the IEA interviews with Veolia personnel.

If any items of non-compliance are identified during the interview they will be raised with Veolia and noted in the report. If an item which poses a safety risk or risk of environmental harm, the Veolia representative will be notified immediately.

3.3.4 Site Inspection

A Veolia representative will be required to accompany the IEA team member on the site inspection. Photographs and measurements (where appropriate) will be taken of items of interest or items requiring corrective action. If any items of non-compliance are identified, they will be raised with Veolia and noted in the report. If an item which poses a safety risk or risk of environmental harm, the Veolia representative will be notified immediately.

3.3.5 Conduct the Closing Meeting

A closing meeting will be conducted with Veolia at the end of the IEA. It will provide an opportunity for Epic to outline positive and negative findings identified during the IEA, Veolia to respond or clarify any findings, and the Epic to confirm the process following the IEA. Meeting minutes will be maintained and issued by Epic following the meeting.

3.3.6 IEA Findings

The findings of the document review and interviews will be assessed, and each finding assigned a rating within the IEA checklist. Once complete the IEA checklist will be provided (in excel format) to Veolia for a review and response to each finding. Each Veolia response to a non-compliance must also specify actions and the completion timing (dd/mm/yyyy) of such actions that are to be taken in response to the non-compliance. For each opportunity for improvement Veolia must provide reasons if they propose not to implement any measures or make any changes in response.

3.3.7 Independent IEA Report

Once the findings are assessed, rated, and reviewed, an independent IEA report will be prepared. The independent IEA report will include:

- Introduction, including:
 - Background of the site
 - The IEA team
 - The objectives of the IEA
 - The IEA scope
 - The IEA period
 - The IEA method, including
 - Development of IEA scope was developed
 - A summary of the IEA process adopted to determine the compliance status and assess
 - A list of the approvals and documents reviewed
 - Details of personnel interviewed including their name and position title
 - Details of site inspections undertaken
 - A summary of the consultation undertaken prior to the IEA
 - Meanings of compliance status descriptors used, as set out in this document
 - The IEA findings, including
 - A summary of the assessment of compliance
 - Details of notices, orders, penalty notices or prosecutions issued in relation to the consent during the IEA period
 - Exception reporting of all non-compliances identified during the IEA period
-

- A discussion of the status of actions arising from previous IEAs and the progress or outcomes of each action
- A discussion of whether the OEMP, Sub-plans and compliance documents are adequate and implemented
- A discussion of other matters considered relevant during the IEA
- A summary of complaints, and the adequacy of the response to, and management of complaints
- Details of any incidents and the adequacy of the response to, and management of such incidents
- An assessment of the compliance between actual and predicted impacts documented in environmental impact assessment
- Evidence collected through site inspections undertaken during the IEA
- Any continual environmental management improvement opportunities identified as part of the IEA
- Positive observations identified by the Auditor related to environmental management and performance
- Recommendations and opportunities for improvement
- The following appendices:
 - Complete IEA checklist including responses to findings
 - A copy of documentation from the Planning Secretary agreeing to the IEA Team
 - Documentation detailing consultation with the Department, and other agencies or stakeholders
 - Completed and signed Independent IEA Declaration Form
 - Site inspection photographs



4 GENERAL IEA MATTERS

4.1 Logistical Arrangements for THE IEA

Transport to and from the site will be organised by Epic. The Veolia representative will organise all teleconference arrangements.

4.2 General IEA Matters

The IEA team will complete the Veolia visitors' inductions prior to undertaking the site inspection. The IEA team will be escorted at all times by a Veolia representative.

In accordance with the site requirements, the following PPE will be worn by the IEA team members:

- Long Pants
- Long sleeve shirt
- Steel cap work boots
- Protective eyewear
- Hard hat

4.3 Matters Related to Confidentiality

All information supplied, sighted, and disclosed as part of this IEA will remain confidential. Outcomes of the IEA will be provided to Veolia.

4.4 Auditors Code of Conduct

All certified Auditors have an obligation to improve the standing of their profession by observing the Exemplar Global Code of Conduct (Code). Compliance with the Code is a condition of certification and all Auditors have signed an agreement to comply with the Code and are required to confirm that they have complied with the Code at each period of surveillance and re-certification.

Code of Conduct

- Auditors will act professionally, accurately and in an unbiased manner
 - Auditors will strive to increase the competency and prestige of the profession
 - Auditors will assist those in their employ or under their supervision in developing their professional competency
 - Auditors will not undertake any assignments that they are not competent to perform
 - Auditors will not represent conflicting or competing interests and will disclose to any client or employer any relationships that may influence their judgment
 - Auditors will not discuss or disclose any information relating to any assignment unless required by law or authorised in writing by the client and/or their employing organization
 - Auditors will not accept any inducement, commission, gift or any other benefit from client organizations, their employees or any interested party or knowingly allow colleagues to do so
 - Auditors will not intentionally communicate false or misleading information that may compromise the integrity of any assignment or the personnel certification process
 - Auditors will comply with Exemplar Global Certification Requirements, procedures and advisories which are relevant to their profession or certification
 - Auditors will not act in any way that would prejudice the reputation of Exemplar Global or the personnel certification process and will cooperate fully with an enquiry in the event of any alleged breach of this code
-

4.5 Key Contacts

Table 4: Key Contacts

Name	Company and Position	Phone	Email
Dora Ambrosi-Wall	Veolia Representative	0409 971 474	Dora.ambrosi-wall@veolia.com
Kirsty Douglas	Epic, Project Manager and Lead Auditor	0410 410 373	kdouglas@epicenvironmental.com.au
Gabrielle Head	Epic Assistant Auditor	0417 487 106	ghead@epicenvironmental.com.au
Chris Griffiths	Epic Assistant Auditor	0498 836 242	cgriffiths@epicenvironmental.com.au

5 LIMITATIONS AND DISCLAIMER

Epic Environmental Pty Ltd (Epic) has prepared the following report for the exclusive benefit of Veolia (Client) and for the singular purpose of documenting an IEA plan for the 2023 Wetherill Park Resource Recovery Facility Independent Environmental Audit. All interpretations, finding or recommendations outlined in this report should be read and relied upon only in the context of the report as a whole.

The following report cannot be relied upon for any other purpose, at any other location or for the benefit of any other person, without the prior written consent of Epic. Except with Epic's prior written consent, this report may not be:

- a. released to any other person, whether in whole or in part;
- b. used or relied upon by any other party; or
- c. filed with any Governmental agency or other person or quoted or referred to in any public document.

This report has been prepared based on information provided by the Client and other parties. In preparing this report Epic:

- a. presumed the accuracy of the information provided by the Client (including its representatives);
- b. has not undertaken any verification to the accuracy or reliability included in this information (with the exception where such verification formed part of the scope of works);
- c. has not undertaken any independent investigations or enquiries outside the scope of works with respect to information provided for this report; and
- d. provides no warranty or guarantee, expressed or implied, as to the accuracy or reliability of the information provided in this report.

In recognition of the limited use of this report, the Client agrees that, to the maximum extent permitted by law, Epic (including its representatives and related entities) is not liable for any losses, claims, costs, expenses, damages (whether pursuant to statute, in contract or tort, for negligence or otherwise) suffered or incurred by the Client or any third party as a result of the information, findings, opinions, estimates, recommendations and conclusions provided in this report.

Without limiting the above, Epic (including its representatives and related entities) is not liable, in any way whatsoever:

- a. for the use or reliance of this report for any purpose other than that for which it has been prepared;
- b. for any use or reliance upon this report by any person other than the Client;
- c. where another person has a different interpretation of the same information contained in the report;
- d. for any consequential or indirect losses, or for loss of profit or goodwill or any loss or corruption of any data, database, or software.

If a section of this disclaimer is determined by any court or other competent authority to be unlawful and/or unenforceable, the other sections of this disclaimer continue in effect. Where further information becomes available, or additional assumptions need to be made, Epic reserves its right to amend this report, but is not obliged to do so.



5 REFERENCES

NSW Government 2020, *Independent IEA Post Approval Requirements* (Department of Planning, Industry and Environment)

AS/NZS ISO 19011:2019 - Guidelines for Auditing management systems.



CONTACT US

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Project name: **Independent Environmental Audit - Wetherill Park Resource Recovery Facility**

APPENDIX D INDEPENDANT ENVIRONMENTAL AUDIT TABLE



CONFIDENTIAL

**Veolia Australia & New Zealand
Wetherill Park Resource Recovery Facility –
2023 Independent Environmental Audit – Audit Table**

IEA Date:

Auditor: Kirsty Douglas

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

Date 31/08/2023

(Name)

(Sign)

Key for Compliance Assessment

Audit Rating	Rating	Definition
Compliant	C	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or OEMP requirement have been complied/conformed with within the scope of the audit.
Non compliant	NC	The auditor has determined that one or more specific elements of the conditions or OEMP requirements have not been complied/conformed with within the scope of the audit.
Not Triggered	NT	A condition or 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/conformance is not relevant.

**Wetherill Park Resource Recovery Facility
2023 Independent Environmental Audit
Verification of 2020 IEA Findings**

Condition Number	Document/ Condition Reference	2020 Non-Compliance Findings	2020 Recommendation	Finding	Verification of Status	2023 Status
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 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.	NC	Site personnel confirmed that an interim Occupation Certificate has been issued, however stage 2 construction is currently going through a modification (expected to be complete by end of year) and a final certificate will be issued upon completion of stage 2 construction works	Open, evidence of substantial progress was observed, however will remain open until final occupation certificate is received.
A28	Surrender of Consents	Application for surrender of all preexisting development consents has been approved by Fairfield City Council, dated 18 August 2020, after Stage 1 operations commenced.	The surrender of preexisting consents has been issued by FCC.	NC	The surrender of all pre-existing development consents occurred outside of this audit period. The previous IEA identified this as a non conformance - although the consents had been surrendered, it occurred after the commencement of stage 1 operations. This non compliance is considered closed for the purpose of this audit	Addressed and no further action required
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.	SUEZ should review the stormwater management system for the site; if a first flush system is not required then a modification should be submitted.	NC	Site personnel confirmed that the installation of the first flush system is still in progress. Evidence of it being ordered was sighted during the audit interviews as well as confirmation that is expected to be installed by the end of July 2023.	Open, evidence of progress was observed
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 subplans (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 Traffic Management Plan has been approved by DPIE.	NC	The Traffic Management Plan was approved outside of this audit period. The plan demonstrates compliance with the requirements of this condition. It is noted that if additional carparks are to be installed and upon approval of the stage 2 Modification, the TMP will be required to be updated. This NC occurred in the past and was an administrative NC with no action required.	Addressed and no further action required
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.	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.	NC	Waste vehicles entering the site were observed to be enclosed. The site was being cleaned at the time of the site inspection.	Addressed and no further action required
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 subplans (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.	NC	The OEMP is published and addresses the requirements of this condition. Th NC identified in the 2020audi was administrative with no action required	Addressed and no further action required
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.	SUEZ should prepare an Annual Review which covers the period 11/09/2019 to 10/09/2020.	NC	An independent environmental audit was completed by Element Environmental and covered the period between December 2019-October 2020	Addressed and no further action required
C14	Access to information	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. 27/07/2021 Update: On the day of the audit the complaint register and noise assessment was not publicly available. This was attributed at the time to a recent website update. As of 27/07/2021, the recently completed annual review has been upload but a complaint register and noise assessment are still missing.	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).	NC	Documents required under this condition are published on the website. Note: documents are currently being transferred over to a new system, therefore only the most current versions of management plans, monitoring documents etc are currently published.	Addressed and no further action required

**Wetherill Park resource Recovery Facility
2023 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (7267 MOD1)**

Condition Ref	Requirement (Exact Wording)	Compliance rating	Evidence Reviewed	Independent IEA Findings	Unique Identification
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
A1	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all measures to prevent and/or minimise any harm to the environment that may result from the Development.	Non Compliant	1. Site inspection 2. Audit interviews	The Applicant generally demonstrated compliance with the requirements of this consent with the exception of non conformances identified for conditions B4, B5 and B23(b).	NC-01
TERMS OF CONSENT					
A2	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.	Non Compliant	1. Audit interviews 2. Site inspection	The Applicant generally demonstrated compliance with the requirements of this consent with the exception of non conformances identified for conditions A1, A8, A9, A27, B4, B5, B23(b), B39 and B41.	NC-01
A3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Note only	NA	Note only.	
A4	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.	Compliant	1. Audit interviews	Site personnel confirmed that they have not received any requests from DPE as per the requirements of this condition. site personnel confirmed that the 2019 management plans were submitted to DPE for review and approval. The 2019 management plans are currently going through a review / update to transfer them from SUEZ templates into Veolia templates. The updated management plans will go through an internal review, however will not be submitted to DPE unless requested. Email evidence of internal review sighted during the audit. Note: some documents (SUEZ historical reports etc) appear to have become corrupt with the move from SUEZ systems to Veolia therefore evidence of document review/endorsement was not provided during the interviews.	
LIMITS OF CONSENT					
A5	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EP&A Act.	Compliant	1. Audit interviews	Operations commenced within 5 years from the date of the Consent (8/12/2019) demonstrating compliance with the requirements of this condition	
A6	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.	Compliant	Refer to the EPL findings	The site operates under an Environmental Protection Licence - EPL 4548. Refer to the audit findings against the requirements of EPL 4548 for full details	
A7	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 m3 of asbestos waste per week.	Compliant	1. Waste records (Mandalay) 2. Audit interviews	Examples of monthly waste records sighted during the interview showed the monthly incoming and outgoing waste volumes, indicating compliance with the requirements of this condition	

**Wetherill Park resource Recovery Facility
2023 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (7267 MOD1)**

Condition Ref	Requirement (Exact Wording)	Compliance rating	Evidence Reviewed	Independent IEA Findings	Unique Identification
A8	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.	Non Compliant	1. Consultation letter - 2023 IEA (EPA, 4/07/2023) 2. Annual Return 2021-2022 3. Audit interviews	Waste is generally processed and remove offsite within 24 hours, however one exceedance of the waste limit occurred on 8 March 2022 as a result of significant rainfall resulting in several other facilities diverting waste to the Wetherill Facility. EPA were notified and to prevent a reoccurrence, Veolia reported that material levels on site would be maintained as low as reasonably practicable in preparation for future flood events. Material on site was transported to alternate licence facilities and landfill on 9 March 2022. EPA notified and the exceedance was also reported in the Annual Return.	NC-02
A9	The Applicant must not store general solid waste (putrescible) at the site for more than 24 hours from the time of receipt.	Non Compliant	1. Audit interviews	Site personnel confirmed that the majority of the time waste is cleared within 24 hours, however due to a change in operational hours, the site is closed between 4pm Saturday to 10PM on a Sunday, therefore if waste is received on a Saturday it remains on site for more than 24 hours (i.e.. not removed until Monday morning.	NC-03
STAGED SUBMISSION OF PLANS OR PROGRAMS					
A10	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.	Not Triggered	NA	This condition does not require the applicant to comply with the condition, it simply allows for the Applicant to submit any strategy , plan or program as per the items listed in this condition.	
A11	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.	Not Triggered	NA	No staging has occurred as outlined in this condition.	
REQUEST FOR INFORMATION					
A12	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.	Compliant	1. Mandalay - waste records 2020 - 2023 2. WARRP monthly reports 2020 - 2023 3. Audit interviews	site personnel confirmed that all records are maintained through the weighbridge in the system called Mandalay. A monthly waste and resource report (WARR) is submitted to the EPA via reconnect - this report tracks waste coming in and out of the site. Reports from 2019 - 2022 were sighted during the audit interviews.	
A13	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.	Compliant	1. Mandalay - waste records 2020 - 2023 2. WARRP monthly reports 2020 - 2023 3. Audit interviews	Records are stored in the Mandalay system, however these will be transferred over to Veolia document control systems - currently going through process of identifying an appropriate program.	
EVIDENCE OF CONSULTATION					

**Wetherill Park resource Recovery Facility
2023 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (7267 MOD1)**

Condition Ref	Requirement (Exact Wording)	Compliance rating	Evidence Reviewed	Independent IEA Findings	Unique Identification
A14	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.	Compliant	1. Audit interviews	The 2019 management plans were approved by DPE outside of this audit period. These plans are currently going through review and update and will be submitted to relevant authorities as required.	
STATUTORY REQUIREMENTS					
A15	The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	Compliant	1. EPL 4548 2. Consent to discharge industrial trade wastewater - consent No 12318 (Sydney water, 18/08/2021) 3. Audit Interviews	The site operates under EPL 4548 and a trade waste agreement with Sydney Water	
DEMOLITION					
A16	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.	Not triggered	1. Audit interviews	Site personnel confirmed that no demolition works have occurred within the audit period.	
STRUCTURAL ADEQUACY AND CERTIFICATION					
A17	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.	Not triggered	1. Audit interviews	Site personnel confirmed that there have been no new buildings and structures, and any alterations or additions to existing buildings and structures within the audit period. An interim occupation certificate was received for Stage 1 construction works (assessed as part of the 2020 IEA), however a final occupation certificate will be received after approval of stage 2 (modification expected to be approved by end of 2023).	
A18	Prior to the issue of the Final Occupation Certificate, adjustments to any public utilities necessitated by the development are to be completed in accordance with the requirements of the relevant Authority. Any utility costs are to be at no cost to Council.	Not triggered	1. Audit interviews	site personnel confirmed that there has been no service relocations within the audit period.	
UTILITIES AND SERVICES					
A19	Prior to the construction of any utility works associated with the Development, the Applicant must obtain relevant approvals from service providers	Not triggered	1. Audit interviews	site personnel confirmed that construction of any utility works associated with the Development has not occurred within the audit period.	
A20	Prior to the commencement of Stage 1 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.	Compliant	1. Consent to discharge industrial trade wastewater - consent No 12318 (Sydney water, 18/08/2021) 2. Audit interviews	site personnel confirmed that a Trade Waste Agreement (consent to discharge) for the operations has been approved by Sydney Water (18/08/2021). Renewal of this agreement is due every four years.	

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A21	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.	Compliant	1. Consent to discharge industrial trade wastewater - consent No 12318 (Sydney water, 18/08/2021) 2. Audit interviews	site personnel confirmed that a Trade Waste Agreement (consent to discharge) for the operations has been approved by Sydney Water (18/08/2021). Renewal of this agreement is due every four years.	
PROTECTION OF PUBLIC INFRASTRUCTURE					
A22	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 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.	Not triggered	1. Audit interviews	Construction for stage 1 was completed prior to this audit period. Stage 2 construction is yet to commence (currently going through a modification)	
A23	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.	Not triggered	1. Audit interviews	No public infrastructure has been relocated or damaged within the audit period	
OPERATION OF PLANT AND EQUIPMENT					
A24	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.	Compliant	1. Audit interviews 2. Pre-operation checklist - mobile plant (daily)	site personnel confirmed that all "yellow gear" is leased from select civil, who undertake all maintenance of equipment (based on hours used). Daily pre-starts record the plant type and number, start and finish engine hours and a checklist that identifies anything requiring attention. These checklists are submitted to Select Civil. Internal machinery is maintained by the Repairs and maintenance team - all machinery goes through the same daily pre-operation checklist and maintenance is based on hours used / as required.	
COMPLIANCE					
A25	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.	Compliant	1. Training matrix 2. Audit interviews	All staff undertake a site induction, and are required to undertake additional training based on their role/job requirements. All training requirements are recorded in the training matrix (sighted during the audit interviews) and included the following information: - personnel - training modules/requirements - traffic light system to trigger whether training has been completed /due (red = due, orange = coming up; green = complete; grey not applicable to personnel job requirements) - date completed Training refresher depends on the module - generally between 12 -36 months. e.g. High risk activities require 12 monthly refreshers.	
DEVELOPMENT CONTRIBUTIONS					
A26	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.	Not triggered	NA	Payment occurred outside of this audit period. The previous audit confirmed compliance with the requirements of this condition.	
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).	Not triggered	NA	Payment occurred outside of this audit period. The previous audit confirmed compliance with the requirements of this condition.	
REQUIREMENTS PRIOR TO COMMENCEMENT OF STAGE 2 OPERATIONS					

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A27	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.	Non Compliant	1. Audit interviews	Site personnel confirmed that an interim Occupation Certificate has been issued, however stage 2 construction is currently going through a modification (expected to be complete by end of year) and a final certificate will be issued upon completion of stage 2.	NC-04
A27A	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.	Not Triggered	1. Audit interviews	Site personnel confirmed that Stage 2 construction has not commenced as it is currently going through a modification.	
SURRENDER OF CONSENTS					
A28	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.	Not triggered	1. Audit interviews 2. Surrender approvals	The surrender of all pre-existing development consents occurred outside of this audit period. The previous IEA identified this as a non conformance - although the consents had been surrendered, it occurred after the commencement of stage 1 operations. This non compliance is considered closed for the purpose of this audit	
PART B: ENVIRONMENTAL PERFORMANCE AND MANAGEMENT					
WASTE MANAGEMENT: Receipt, Storage & Handling of Waste					
B1	The Applicant shall only receive waste on site that is authorised for receipt by an EPL.	Compliant	1. Mandalay - waste records 2020 - 2023 2. Site inspection 3. Audit interviews	A random selection of waste records sighted during the audit interviews indicated that the site had not received waste that was not permitted in accordance with the consent.	
B2	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.	Not triggered	1. Audit interviews	Stage 1 construction was completed prior t this audit period and stage 1 construction was yet to commence.	
B3	The Applicant shall: (a) implement auditable procedures to: i. ensure the site does not accept wastes that are prohibited; ii. screen incoming waste loads; and (b) ensure that: i. all waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; ii. 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		1. Operational Environmental Management Plan Ver.3 (PLANS004, November 2019) 2. Audit interviews 3.Site inspection	Section 4 of the OEMP includes procures that address the requirements of this condition: a) Training is provided to staff regarding unacceptable waste; unloading f waste is supervised and monitored. b) All waste entering/exiting site is recorded through the Mandalay system; training provided to staff; asbestos storage is well maintained The interview with a weighbridge operator identified that drivers confirm the waste types in their trucks on entering the site and are directed to the appropriate area for disposal. Ste staff visually check waste areas for any items that are not accepted on site (once truck has dumped waste). If unaccepted items are identified (e.g. lithium batteries / medical waste), the items are segregated and the Veolia investigate which truck it has come form. The waste is then collected and removed offsite by an appropriate transporter to an appropriate facility. Records of what has been collected including weight is maintained through the Mandalay system.	
Wastewater					

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B4	The Applicant shall ensure all wastewater is discharged to sewer in accordance with a Trade Waste Agreement with Sydney Water.	Non compliant	1. Consent to discharge industrial trade wastewater - consent No 12318 (Sydney water, 18/08/2021) 2. Certificate of Analysis - water analysis (ALS, 2021 - 2023) 3. Certificate of Analysis (ALS - random selection between 2020 - 2023) 4. Audit interviews	All water onsite goes through trade waste system. A review of a random selection of samples (lab analysis) suggest that the water being released through trade waste is within the requirement of the consent to discharge within the exception of one release (sample collected 2/02/2022) for sulfate and pH.	NC-05
B5	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 to the extent of the inconsistency.	Non compliant	1. Audit interviews 2. Work order	Site personnel confirmed that the installation of the first flush system is still in progress. Evidence of it being ordered was sighted during the audit interviews as well as confirmation that is expected to be installed by the end of July 2023. Note: this was identified as a NC in the 2020 audit with a proposed action to install a first flush system. This non conformance remains open for the purposes of this audit.	NC-06
AIR QUALITY:					
Meteorological Station					
B6	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.	Compliant	1. Audit interviews 2. Work order (1/06/2023)	Site personnel confirmed the weather station installed on site is currently not functioning at the time of the site inspection, however, the works order (1/06/2023) and confirmation of installation (19/7/2023) if the new station was provided.	
Odour Management					
B7	The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Compliant	1. Odour Management Plan Ver.2 (PLANS004 Addendum 1, 22 September 2021) 2. SUEZ EPA response to alleged odour complaint (letter dated 14/02/2022) 3. Audit interviews	1. This is addressed in Section 2.2 Environment Protection Licence of the OMP, Table 3 outlines the licence conditions. It is further addressed in section 1.2: Objective, which outlines that the objective of the OEMP is to ensure there is no offensive odour beyond the boundary of the site. 2. EPA received odour complaints allegedly coming from the facility. SUEZ responded to all questions raised by the EPA confirming no putrescible waste was received during the complaint period, no activities occurred outside of normal operations, all odour management measures were in place.	

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B8	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 working floor in the receival hall to prevent the absorption of leachate into the tipping floor.	Compliant	1. Odour Management Plan Ver.2 (PLANS004 Addendum 1, 22 September 2021) 2. SUEZ EPA response to alleged odour complaint (letter dated 14/02/2022) 3. Audit interviews	Deodoriser sprays are installed and can run on auto or manually operated. The system emits a spray for 15 seconds every 45 seconds. The OEMP includes: (a) Section 5.7.2: Infrastructure and Collection, details what the dust suppression system consists of. (b) Section 5.5.1: Management Strategy, details that majority of the site has been sealed so that leachate is contained and treated.	
B9	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 the walls 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.	Compliant	1. Odour Management Plan Ver.2 (PLANS004 Addendum 1, 22 September 2021) 2. Photographic evidence of wall washdowns 3. Site inspection 4. Audit interviews	Evidence was provided by site personnel confirming that continual cleaning of the site occurs: a) weekly washdown of tipping area occurs - washdown was observed at the time of the site inspection b) photo evidence of annual washdown from previous years was provided, site personnel confirmed that this is scheduled to occur during the shutdown period (mid July) c) site personnel confirmed that this no longer occurs on site - all trucks are taken offsite for cleaning d) site personnel confirmed the e sprays operate automatically, however can be manually operated if required. The OEMP indicates: (a) Section 3.2.1 Waste Receival and Storage Area (b) Section 3.2.1 Waste Receival and Storage Area	
Dust Management					
B10	The Applicant must implement all measures to minimise dust generated during construction and operation of the Development.	Compliant	1. Odour Management Plan Ver.2 (PLANS004 Addendum 1, 22 September 2021) 2. Site inspection 3. Audit interviews	Section 5.7.1: Management Strategy of the OEMP discusses all measures used to minimise dust generated during construction and operation.	
B11	During construction, the Applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving 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.	Not Triggered	1. Audit interviews	Stage 1 construction completed prior to this audit period. Stage 2 construction is currently going through a modification and is yet to commence.	
B12	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	Compliant	1. Audit interviews 2. Site inspection	Deodorising sprays installed on site and were observed during the site inspection. Potential dust nuisance from the waste streams is controlled through a s misting system that operates automatically inside the shed (can also be operated manually). Hoses are available around the site to "wet down" the site if required Roads and sealed areas are maintained - road sweeping is also available as required - is controlled.	
B13	During operations, the Applicant must: (a) 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.	Compliant	1. Audit interviews 2. Site inspection	Site personnel confirmed that all site cleaning occurs on a regular basis in accordance with the requirements of this condition. Photographic evidence was provided showing walls/transfer station being cleaned and wall cleaning was also observed during the site inspection.	
Odour Management Plan					

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B14	<p>Prior to the commencement of Stage 1 operations and Stage 2, 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:</p> <p>(a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;</p> <p>(b) describe the measures that would be implemented on-site to ensure:</p> <p>i. odour emissions are minimised, including details of the air pollution control devices and all other operational odour mitigation measures;</p> <p>ii. compliance with the relevant conditions of this consent;</p> <p>iii. compliance if adverse odour emissions occur or appear likely to occur;</p> <p>(c) include an ongoing monitoring program;</p> <p>(d) include well defined triggers for the deployment of odour mitigation and contingency measures.</p>	Compliant	1. Odour Management Plan Ver.2 (PLANS004 Addendum 1, 22 September 2021)	<p>The odour management plan is published and addresses the requirements of this condition:</p> <p>(a) Section 1.4.1: OEMP requirements</p> <p>(b) The OMP includes:</p> <ul style="list-style-type: none"> - Section 3.2: Controls of Potential Odour Sources - Section 3.2.5: General - Section 3.2.6: Odour Monitoring Program <p>(c) Section 3.2.6: Odour Monitoring Program</p> <p>(d) Section 4: Environmental Incident Management and Community Engagement</p> <p>(e) Section 5: Contingency Plan - outlines all possible unpredicted events and the operational controls to mitigate their risks.</p>	
B15	The Applicant shall ensure the OMP (as required and approved by the Secretary from time-to-time) is implemented for the operational life of the Development.	Compliant	1. Odour Management Plan Ver.2 (PLANS004 Addendum 1, 22 September 2021)	Section 6.2 OMP Review - the OMP will be reviewed every two years for the continuation of the development. Section 9 Review and document control confirms reviews have been undertaken every 2 years (Version 1 dated 2019).	
Odour Audit					
B16	<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> <p>(a) be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Secretary;</p> <p>(b) audit the Development in full operation;</p> <p>(c) include a summary of odour complaints and any actions that were carried out to address the complaints;</p> <p>(d) validate the Development against odour impact predictions in the EIS and the RTS;</p> <p>(e) review the design and management practices in the Development against industry best practice for odour management;</p> <p>(f) identify suitable odour mitigation options and controls, including but not necessarily limited to:</p> <p>i. mechanical ventilation;</p> <p>ii. operation of the building under negative pressure to minimise fugitive emissions; and</p> <p>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>	Not triggered	1. SUEZ-Wetherill Park RRF Odour Audit (15/05/2020)	<p>Stage 2 construction is currently going through a modification and is yet to commence, however an odour audit was undertaken by ERM in May 2020, which is outside of this audit period. The report generally demonstrated compliance with the requirement of this condition with the exception of the auditor being endorsed by DPE.</p>	
Note	The Odour Audit may be prepared so that it addresses the requirements of this consent and the EPL for the Development.	Note only	NA	Note only	
B17	Within two months of commissioning of the Odour Audit required by Condition B16, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the Odour Audit report to the satisfaction of the EPA and Secretary, together with the Applicant's response to any recommendations contained in the Odour Audit report.	Not triggered	1. SUEZ-Wetherill Park RRF Odour Audit (15/05/2020)	Then odour audit undertaken by ERM in May 2020, which is outside of this audit period, however it was confirmed in the 2020 audit that it was submitted to DPIE and the EPA as required.	
B18	The Applicant must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of the Odour Audit report required by Condition B17.	Compliant	1. SUEZ-Wetherill Park RRF Odour Audit (15/05/2020) 2. Odour Management Plan Ver.2 (PLANS004 Addendum 1, 22 September 2021)	<p>The recommendations outlined in the odour audit have been actioned as follows:</p> <ul style="list-style-type: none"> - WPRRF Weekly odour monitoring checklist is being used (a random selection of the checklist was provided confirm that it is being downloaded and used on a weekly basis) - inspection of the deodorisers on the weekly checklist is included 	

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SOILS, WATER QUALITY AND HYDROLOGY					
Discharge Limits					
B19	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.	Compliant	1. Site inspection 2. Trade waste Report 3. Certificate of Analysis (ALS, random selections 2020-2023)	All water onsite goes through the trade waste system. Observations on site confirmed that there no obvious signs of water pollution. There were no signs of litter or oily water present in the e GPT. All stormwater pits did have sediment build up, however cleaning of these was observed during the site inspection. Sampling is undertaken on a regular basis - a random selection of ALS lab reports confirmed compliance with the trade waste agreement.	
Flood Management					
B20	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: i. the flood 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; v. evacuation and refuge protocols; and vi. awareness training for employees and contractors.	Compliant	1. Flood Emergency Response Plan (November 2019) 2. Emergency Response Plan Ver. 8 (PLANS003.2.15, 23/07/2021) 3. Operational Environmental Management Plan Ver.3 (PLANS004, November 2019) 4. Construction Environmental Management Plan Rev8 (24/06/2019) 5. Approval of CEMP SSD7267 (stage 1 and Stage 2 Construction) - DPE 4/07/2019	The Flood management plan was approved outside of this audit period (4/07/2019). A flood action plan is included in the Emergency Response Plan which outlines the actions to be followed: - Alert phase (prior to a flood event) - Response phase (during the flood event) - Recovery phase (after the flood event) The flood management plan is included as Appendix 9 of the OEMP and Sub Plan B3 in the CEMP.	
B21	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.	Compliant	1. Audit interviews 2. Site inspection	site personnel confirmed that all staff are required to complete a site induction that covers relevant management plan. A copy of emergency evacuation procedures was available on the noticeboard inside the administration building. Evacuation procedures were also observed on signage at various locations around the site	
B22	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.	Compliant	1. Flood Emergency Response Plan (November 2019) 2. Site inspection	The flood evacuation diagram is included in the Flood Management Plan	
Stormwater Management System					
B23	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 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.	Non Compliant	1. Site inspection 2. Audit interviews 3. Matic Plumbing inspection records	Site personnel confirmed that all water onsite goes through a treatment system onsite and is released to trade waste as per the requirements of the discharge consent. The system has a keystone valve that can be turned off to prevent release to stormwater. The valve undergoes annual inspection (Matic plumbing). Observations made during the site inspection confirmed a bund is present around the site. Condition B5 requires a first flush system to be installed. The EIS also identifies a first flush system to be installed, which has not been installed to date (also refer to the findings for condition B5).	NC-06

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Chemical Spills and Fire Water Containment					
B24	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 FRNSW, the Applicant must ensure: (a) the stormwater isolation valve is automatically initiated upon either sprinkler activation and/or alternatively via activation of any Manual Call Point installed within the site; (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	Compliant		All water on site is released through trade waste as per the agreement with Sydney Water. A keystone valve on the holding tank can be manually opened/closed	
Sprinkler and Fire Hydrant System					
B25	Prior to the commencement of Stage 1 operations and to the satisfaction of FRNSW, the Applicant must ensure: (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; (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 (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).	Compliant	1. Audit interviews 2. Test Reports	Certification was provided prior to this audit period and was confirmed as compliant in the 2020 audit. Site personnel confirmed that the system is tested monthly (reports sighted) by an external party - Beyond fire service and maintenance.	
Imported Soil					
B26	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.	Not Triggered	1. Audit interviews	The Site personnel confirmed that there has been no imported soil during the audit period.	
Erosion and Sediment Control					
B27	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 C1.	Not Triggered	1. Audit interviews	site personnel confirmed that no construction works has occurred within the audit period. Stage 1 construction was completed outside of this audit period and stage construction is yet to commence,	
TRAFFIC AND ACCESS					
Parking					
B28	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 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	1. Site inspection 2. Audit interviews	The number of carparks provided at the site complies with the requirements of this condition. The Site personnel confirmed that an additional six car parks at rear of the site for drivers and one additional car park at the front of the administration building (disabled car park being moved) are proposed to be installed.	
Operating Conditions					

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B29	<p>The Applicant must ensure:</p> <p>(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 2890.1 and AS 2890.2;</p> <p>(b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTRROADS guidelines;</p> <p>(c) the Development does not result in any vehicles queuing on the public road network;</p> <p>(d) heavy vehicles and bins associated with the Development are not parked on local roads or footpaths in the vicinity of the site;</p> <p>(e) all vehicles are wholly contained on site before being required to stop;</p> <p>(f) all loading and unloading of 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 7m to the west to prevent queuing on Davis Road.</p>	Compliant	1. Site inspection	<p>Construction of the internal roads occurred outside of this audit period. Observations made during the site inspection confirmed:</p> <ul style="list-style-type: none"> - internal roads are well maintained (regularly cleaned), however there was evidence of cracking in the asphalt - vehicles entering / exiting the site adhered to the internal signage - there were no vehicles queuing on the public road - all vehicles were observed to be unloading waste in the correct areas. 													
NOISE																	
B30	<p>Prior to the commencement of Stage 1 operations and Stage 2, 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 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;</p> <p>(d) detail heavy vehicle routes, access and parking arrangements;</p> <p>(e) 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. 	Compliant	1. Traffic Management Plan Ver2 (PLAN002, 3/10/2016).	<p>The Traffic Management Plan was approved outside of this audit period. The plan demonstrates compliance with the requirements of this condition. It is noted that if additional carparks are to be installed and upon approval of the stage 2 Modification, the TMP will be required to be updated.</p> <p>The 2020 audit identified a NC given the date of the approval of the plans occurred after the commencement of stage 1 operations. This NC occurred in the past with no action required, therefore for the purposes of this IEA, the TMP is considered compliant.</p>													
B31	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.	Compliant	1. Site inspection	vehicles entering/exiting the site were observed to be following signage and required traffic flow/direction.													
Hours of Work																	
B32	<p>The Applicant must comply with the hours detailed in Table 2</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3" style="text-align: left;"><i>Table 2: Hours of Work</i></th> </tr> <tr> <th style="text-align: center;">Activity</th> <th style="text-align: center;">Day</th> <th style="text-align: center;">Time</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Earthworks and construction</td> <td style="text-align: center;">Monday – Friday Saturday</td> <td style="text-align: center;">7 am to 6 pm 8 am to 1 pm</td> </tr> <tr> <td style="text-align: center;">Operation</td> <td style="text-align: center;">Monday – Sunday</td> <td style="text-align: center;">24 hours</td> </tr> </tbody> </table>	<i>Table 2: Hours of Work</i>			Activity	Day	Time	Earthworks and construction	Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm	Operation	Monday – Sunday	24 hours	Compliant	1. Audit interviews 2. Operational Environmental Management Plan Ver.3 (PLANS004, November 2019)	<p>Stage 1 construction was completed outside of this audit period. Stage 2 is yet to commence.</p> <p>The OEMP includes: Section 5.10.1: Which outlines that process activities will only be conducted during specified operating hours.</p> <p>site personnel confirmed that the hours of operation have changed to 24 hours from 10pm Sunday to 4 pm Saturday; 4 pm Saturday to 10 Pm Sunday - site is closed</p>	
<i>Table 2: Hours of Work</i>																	
Activity	Day	Time															
Earthworks and construction	Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm															
Operation	Monday – Sunday	24 hours															
B33	<p>Works outside of the hours identified in Condition B32 may be undertaken in the following circumstances:</p> <p>(a) works that are inaudible at the nearest sensitive receivers;</p> <p>(b) works agreed to in writing by the Secretary;</p> <p>(c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or</p> <p>(d) where it is required in an emergency to avoid the loss of lives, property and /or prevent environmental harm.</p>	Not Triggered	1. Audit interviews	No works occur outside of hours. Auditee demonstrated knowledge of the requirement of this condition.													

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Condition Ref	Requirement (Exact Wording)	Compliance rating	Evidence Reviewed	Independent IEA Findings	Unique Identification
Construction Noise Limits					
B34	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.	Not Triggered	1. Audit interviews	No construction works occurred within this audit period.	
Operational Noise Limits					
B35	The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits in Table 3. Table 3: Noise Limits dB(A)	Compliant	1. Environmental Noise Assessment Hibbs, 5/04/2023 2. Audit interviews 3. Operational Environmental Management Plan Ver.3 (PLANS004, November 2019)	The noise assessments completed for the reporting period 2020-2021 and 2021-2022 concluded that noise emissions from the site were below the NPI's recommended noise project trigger levels The noise assessment for the reporting period 2022-2023 was yet to be completed at the time of this The OEMP includes: Section 5.10: Noise, outlines the scheduled monitoring to be conducted onsite to ensure that limits are not exceeded.	
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				
Noise Mitigation					
B36	The Applicant must: (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; (b) minimise the noise impacts of the development during adverse meteorological conditions; (c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant and equipment is not being used operationally until fully	Compliant	1. Environmental Noise Assessment Hibbs, 5/04/2023 2. Audit interviews 3. Site inspection	The noise assessments provided concluded that noise emissions from the site were below the NPI's recommended noise project trigger levels and additional mitigation measures were not required to be implemented. Noise on site during the site inspection did not appear to be excessive.	
Construction and Operational Noise Management					
B37	The Applicant must ensure that all its vehicles are fitted with a broadband reversing alarm.	Compliant	1. Site inspection	Vehicles on site were observed to have reverse alarms fitted.	
VIBRATION					
Vibration Criteria					
B38	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).	Not Triggered	1. Audit interviews	Stage 1 construction was completed outside of this audit period. Stage 2 construction is yet to commence.	
HAZARDS AND RISK					
B39	The Applicant must 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. 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.	Compliant	1. Site inspection 2. Audit interviews	Oils were observed to be stored inside the shed on bunded pallets. One 5L container of coolant was observed to be located outside of the bunded pallets, however it was on a sealed area. Spill trays were also observed onsite, however general rubbish was also observed in these trays	OFI-01

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Condition Ref	Requirement (Exact Wording)	Compliance rating	Evidence Reviewed	Independent IEA Findings	Unique Identification
Dangerous Goods					
B40	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 all times.	Compliant	1. Site inspection	The site appeared to be compliant with the requiem of this condition at the time of the site inspection. Note: SEPP 33 has been replaced with State Environmental Planning Policy (Resilience and Hazards) 2021	
B41	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly In accordance with: (d) all relevant Australian Standards; (e) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (f) 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 to the extent of the inconsistency.	Compliant	1. Site inspection	Oils were observed to be stored inside the shed on banded pallets. One 5L container of coolant was observed to be located outside of the banded pallets, however it was on a sealed area. Spill trays were also observed onsite, however general rubbish was also observed in these trays	OFI-01
LITTER AND PEST CONTROL					
Pests, Vermin and Noxious Weed Management					
B42	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.	Compliant	1. Site inspection	Waste vehicles entering the site were observed to be enclosed. The site was being cleaned at the time of the site inspection: - Shed was being cleaned - litter on the driveway was being blown back into the shed - build up in water pits at the rear of the site were being cleaned out	
B43	The Applicant must: (a)implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.	Compliant	1. Site inspection 2. Audit interviews 3. Pest control Receipts (2020 - 2023)	site personnel confirmed: - Charmax Facility Management supplies a gardener for maintenance including weeds - Castor Oil plant and Lantana was observed at the rear of the property, however infestations were locate don the adjacent property making it difficult to eradicate. - Rentokil undertake monthly inspections to mänge pests on site Pests - subcontracted to Rentokil (monthly inspections) Rodent bait boxes were observed around the site; Significant number of Ibis present on site, however site personnel confirmed that there is a reservoir next door where they nest and are unable to	
Note:	For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.				
CONTAMINATION					
B44	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 C1 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Secretary, prior to its removal from the site.	Not Triggered	1.Audit interviews	Stage 1 Construction was completed prior to this audit period.	
TRANSGRID TRANSMISSION LINE EASEMENT					
B45	The Applicant must ensure no works of any kind are permitted within the 20-metre exclusion zone surrounding the transmission line tower.	Compliant	1. Site inspection	Works were not being undertaken within the transmission easement at the time of the site inspection and there is no evidence of any works having been undertaken within the exclusion zone.	
B46	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.	Compliant	1.Audit interviews 2. Site inspection	site personnel confirmed that there have been no changes to the ground level during the audit period.	

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B47	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.	Not Triggered	1.Audit interviews 2. Site inspection	Works were not being undertaken within the transmission easement at the time of the site inspection and there is no evidence of any works having been undertaken within the exclusion zone.	
B48	The Applicant must 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.	Not Triggered	1.Audit interviews 2. Site inspection	Access ways/roads were constructed prior to this audit period.	
B49	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.	Not Triggered	1.Audit interviews 2. Site inspection	Works were not being undertaken within the transmission easement at the time of the site inspection and there is no evidence of any works having been undertaken within the exclusion zone.	
B50	During construction, the Applicant must take adequate precautions to protect structures from accidental damage.	Not Triggered	1.Audit interviews 2. Site inspection	Stage 1 construction was completed outside of this audit period. Stage 2 construction is yet to commence.	
B51	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.	Not Triggered	1.Audit interviews 2. Site inspection	Stage 1 construction was completed outside of this audit period. Stage 2 construction is yet to commence.	
B52	852. The Applicant must ensure that no obstruction of any type shall be placed within 30 m of any part of a transmission line structure.	Not Triggered	1.Audit interviews 2. Site inspection	No obstructions were observed within the transmission easement at the time of the site inspection.	
B53	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.	Not Triggered	1.Audit interviews 2. Site inspection	Stage 1 construction was completed outside of this audit period. Stage 2 construction is yet to commence.	
B54	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 met to ensure public safety.	Not Triggered	1.Audit interviews 2. Site inspection	Stage 1 construction was completed outside of this audit period. Stage 2 construction is currently going through a modification.	
VISUAL AMENITY					
Lighting					
B55	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.	Not Triggered	1.Audit interviews 2. Site inspection	Site personnel confirmed that no new lighting has been installed during the audit period.	
PART C: ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING					
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN					

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C1	The Applicant must prepare a Stage 1 and Stage 2 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 construction; (b) identify the statutory approvals that apply to the Development; (c) outline all environmental management practices and procedures to be followed during construction works associated with the Development; (d) explain the controls that would be implemented to minimise dust emissions during construction of the Development; (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; (g) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and	Not Triggered	1.1.Audit interviews	Stage 1 construction was completed outside of this audit period. Stage 2 construction is yet to commence	
C2	As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following: (a) ERP (see Condition B20); and (b) Erosion and Sediment Control Plan (see Condition B27); (c) Unexpected finds protocol (see Condition B44).	Not Triggered	1. Construction Environmental Management Plan (171227_CEMP_Rev8, June 2019) 2. Audit interviews	Stage 1 construction was completed outside of this audit period. Stage 2 construction is yet to commence	
C3	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.	Not Triggered		Stage 1 construction was completed outside of this audit period. Stage 2 construction is yet to commence	
OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN					
C4	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 the expanded operation; (b) be prepared by a suitably qualified and experienced expert; (c) provide the strategic framework for environmental management of the Development; (d) identify the statutory approvals that apply to the Development; (e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; (f) describe the procedures that would be implemented to: i. Keep the local community and relevant agencies informed about the operation and environmental performance of the Development; ii. Receive, handle, respond to, and record complaints; iii. Resolve any disputes that may arise; iv. Respond to any non-compliance; v. Respond to emergencies; and (g) include the following environmental management plans: i. OEMP (see Condition 814); ii. ERP (see Condition 820);	Compliant	1. Operational Management Plan Ver.3 (PLANS004, November 2019) 2. Audit interviews	The OEMP is published and addresses the requirements of this condition: (a) Section 1.4.1: OEMP requirements. This item was identified as a NC in the 2020 audit findings, however is considered closed for the purposes of this audit as it occurred outside of this audit period and the OEMP was approved by DPE. (b) Section 1.4.1: OEMP requirements - the plan was prepared by site manager and project manager (c) Section 5: Environmental Management and Monitoring (d) Section 1.4: Development Consent (e) Section 1.6: Staffing and Training Requirements and Section 1.7: Organisational Structure (f) - Section 3.1: Environmental Incident Management - Section 3.2: Community Complaints - Section 3.2: Community Complaints - Section 3.1: Environmental Incident Management - Section 3.3: Emergency Preparedness The OEMP also includes the following environmental management plans: - Appendix 9 - Appendix 10 - Appendix 11	
C5	The Applicant must operate the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Compliant	1. Operational Management Plan Ver.3 (PLANS004, November 2019) 2. Site inspections. 3. Audit interviews	The site appeared to be operating in accordance with the commitments made in the OEMP. Section 1.4.1: OEMP requirements states: "SUEZ must operate the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary"	
MANAGEMENT PLAN REQUIREMENTS					

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C6	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: i. The relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. Any relevant limits or performance measures/criteria; and iii. The specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; (c) A description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria; (d) A program to monitor and report on the: i. Impacts and environmental performance of the Development; and ii. Effectiveness of any management measures (see (c) above); (e) A contingency plan to manage any unpredicted impacts and their consequences; (f) A program to investigate and implement ways to improve the environmental performance of the Development over time; (g) A protocol for managing and reporting any: i. Incidents; ii. Complaints; iii. 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	1. Operational Management Plan Ver.3 (PLANS004, November 2019) 2. Site inspections. 3. Audit interviews	The management plans were approved outside of this audit period. Site personnel confirmed that all management plans are currently undergoing a review to align them with Veolia template and to ensure they are current and reflective of site operations.	
Revision of Strategies, Plans and Programs					
C7	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 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.	Compliant	1. Audit interviews	Site personnel confirmed that all site management plans are currently undergoing review /update as a result of change from SUEZ to Veolia. Internal email requesting a review of updated management plans be undertaken prior to them being finalised and published on the website. Note: The site personnel is aware that upon approval of stage 2 Construction modification, the Traffic Management Plan will be required to be updated to reflect the approved works.	
Note	This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.				
ANNUAL REVIEW					
C8	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: i. The relevant statutory requirements, limits or performance measures/criteria; ii. Requirements of any plan or program required under this consent; iii. The monitoring results of previous years; and iv. The relevant predictions in the EIS; (c) Identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) Identify any trends in the monitoring data over the life of the Development; (e) Identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (f) Describe what measures will be implemented over the next year to improve the environmental performance of the Development.	Compliant	1. Annual Environmental Management Review 2021 - 2022 (14/04/2023) 2. eConnect confirmation Annual returns submitted (18/08/2022) 3. Audit interviews	The AEMR generally addresses the requirements of this condition: Table 4 outlines the requirements of this condition and where they are addressed in the report. a) Section 4.3 Site operations overview b) Section 5.1 Complaints; 5.2 Incidents; 6 monitoring; 8 Results; Appendix F i) Section 3.4 EIS summary predictions; 7 Assessment Criteria ii) Section 6 Monitoring Program; Appendices A, C & E iii) Section 8 Results iv) Section 3.4 EIS summary predictions c) Section 1 Statement of Compliance, Tables 1,2,3 & 5; Appendix A d) Section 8 Results e) Section 8 Results f) Section 4.4 Site improvements	

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REPORTING					
Incident Reporting					
C9	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 days after the incident or potential incident.	Compliant	1. Audit interviews 2. Incident register 3. Response letter to EPA - odour complaint (14/02/2022)	Incidents that have occurred within the audit period include: - 2021 bushfire - reported to EPA - 2022 odour complaint. Investigated and findings reported back to the EPA 30/6 - not notifiable but internal records	
C10	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.	Compliant	1. Audit interviews	Incidents register is maintained in a system called Intalex.	
Regular Reporting					
C11	The Applicant must provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Compliant	1. Veolia Wetherill Park website https://www.veolia.com/anz/our-facilities/transfer-stations/wetherill-resource-recovery-facility	At the time of this IEA the following documents are published in the website: - 2020 IEA - Annual Returns - Annual Environmental Management Review - Odour monitoring - Noise assessments - Complaints register It was noted that only the most recent reports/monitoring data was published, as per the requirements of the condition, all historical documents, monitoring data etc should be published .	OFI-02
AUDITING					
Independent Environmental Audit					
C12	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 28 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 any assessment, plan or program required under these approvals); (d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and (e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.	Compliant	1. 2020 Independent Environmental Audit (Element Environmental, 30/11/2020) 2. This audit 3. Appointment of Experts - 2023 IEA (DPE, 09/06/2023)	The 2020 IEA was undertaken within one year of commencement of operations demonstrating compliance with the requirements of this condition: a) persons undertaking the audit were endorsed by the Department (letter included as an Appendix in the 2020 IEA) b) consultation letters provided as an appendix to the 2020 IEA c) the scope of the 2020 IEA included an assessment of environmental performance against the SSD and EPL d) the 2020 IEA included an assessment of applicable management plans and subplans e) the 2020 IEA included recommendations /actions to improve environmental performance of the operations on site. 2023 IEA (this audit): Compliance with the requirements of this condition for this IEA will be assessed in the next IEA due in 2026. a) DPE has endorsed the auditors undertaking the audit b) letters to both the EPA and Council were sent informing them of the upcoming audit and requesting comment. EPA responded, however no response was received from Council c) and d) the scope of this audit is to assess environmental performance against the SSD and EPL as well as the relevant site management plans and subplans e) recommendations actions will be included in the report.	
Note:	This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.				

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C13	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 these recommendations to the satisfaction of the Secretary.	Compliant	1. 2020 Independent Environmental Audit (Element Environmental, 30/11/2020)	The 2020 IEA was undertaken in October 2020 and the IEA report was submitted to the Department within 3 months of commissioning the audit.	
ACCESS TO INFORMATION					
C14	The Applicant must: (a) Make copies of the following publicly available on its website: i. 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 this information up to date, to the satisfaction of the Secretary.	Compliant	1. Veolia Wetherill Park Resource Recovery Facility website: https://www.veolia.com/anz/our-facilities/transfer-stations/wetherill-resource-recovery-facility	The following documents are published in the website: a)ii - Approvals / Development consents iii) Management Plans - Operational Environmental Management Plan (OEMP) - Construction Environmental Management Plan (CEMP) - Odour Management Plan (OMP) - Traffic Management Plan (TMP) - Emergency Response Plan (ERP) iv) Monitoring results: - Noise assessment 2023 - Odour Audit 2020 v) Complaints register for M and June 2023 vi) Annual Environmental Management Review 2021 -2022 vii) 2020 Independent Environmental Audit viii) Copies of all approvals relevant to the site It was noted that only the most recent reports/monitoring data was published, as per the requirements of the condition, all historical documents, monitoring data etc should be published .	OFI-02

Wetherill Park Resource Recovery Facility
2023 Independent Environmental Audit
Environmental Protection License (No. 4548)

Condition Ref	Requirement (Exact Wording)	2023 Audit Compliance Rating	Evidence Reviewed	Independent IEA Findings	Unique Identification Number												
1	Administrative Conditions																
A1	What the licence authorises and regulates																
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Waste processing (non-thermal treatment)</td> <td>Non-thermal treatment of hazardous and other waste</td> <td>Any annual processing capacity</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste</td> <td>Any listed waste type stored</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - other types of waste</td> <td>Any other types of waste stored</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Waste processing (non-thermal treatment)	Non-thermal treatment of hazardous and other waste	Any annual processing capacity	Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	Any listed waste type stored	Waste storage	Waste storage - other types of waste	Any other types of waste stored	Note only	1. Audit interviews	site personnel confirmed that the activities carried out on site are in accordance with the requirements of this condition.	
Scheduled Activity	Fee Based Activity	Scale															
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A2	Premises or plant to which this licence applies																
A2.1	<p>The licence applies to the following premises:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Premises Details</th> </tr> </thead> <tbody> <tr> <td>WETHERILL PARK TRANSFER STATION</td> </tr> <tr> <td>20 DAVIS ROAD</td> </tr> <tr> <td>WETHERILL PARK</td> </tr> <tr> <td>NSW 2164</td> </tr> <tr> <td>LOT 402 DP 603454</td> </tr> </tbody> </table>	Premises Details	WETHERILL PARK TRANSFER STATION	20 DAVIS ROAD	WETHERILL PARK	NSW 2164	LOT 402 DP 603454	Compliant	1. Site inspection.	The scheduled activities described in this Licence were confirmed to be located at the premise as detailed in this condition.							
Premises Details																	
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LOT 402 DP 603454																	
A3	Information supplied to the EPA																
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Compliant	1. Operational Environmental Management Plan Ver.3 (PLANS004, November 2019) 2. Audit interviews	Site operations are carried out in accordance with approved OEMP and subplans.													
2	Limit Conditions																
L1	Pollution of waters																
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> .		1. Audit interviews 2. Site inspection	site personnel confirmed that there have been no incidents within this audit period that have resulted in polluted waters. Waste water on site is directed through to Trade waste as per the agreement with Sydney Water.													
L2	Waste																
	The licensee must not cause, permit or allow any waste to be received at the premises, except																

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L2.1	<p>the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <table border="1" style="width: 100%; border-collapse: collapse; font-size: 8px;"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General solid waste (putrescible)</td> <td>As defined in Schedule 1 of the POEO Act, in force from time to time</td> <td>Waste storage</td> <td>Maximum of 70,000 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Audit interviews</p> <p>2. WARRP Report (Mandalay 2020-2022)</p>	<p>A review of the monthly WARRP Reports indicated the site had not received waste it was not licenced to receive.</p> <p>Interviews with site personnel confirmed that all waste entering the site is confirmed by the drivers as they enter the site.</p>	
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L2.2	The authorised amount of waste permitted on the premises cannot exceed 2,400 tonnes at any one time.	Non compliant	<p>1. Consultation letter - 2023 IEA (EPA, 4/07/2023)</p> <p>2. Annual Return 2021-2022</p> <p>3. Audit interviews</p>	An exceedance of the waste limit occurred on 8 March 2022 as a result of significant rainfall resulting in several other facilities diverting waste to the Wetherill Facility. Material on site was transported to alternate licence facilities and landfill on 9 March 2022. EPA notified and the exceedance was also reported in the Annual Return.	NC-02																																																																											
L3	Potentially offensive odour																																																																															
L3.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises	Compliant	<p>1. Odour Management Plan Ver.2 (PLANS004 Addendum 1, 22 September 2021)</p> <p>2. SUEZ EPA response to alleged odour complaint (letter dated 14/02/2022)</p> <p>3. Weekly odour monitoring checklist</p> <p>4. Audit interviews</p>	<p>1. This is addressed in Section 2.2 Environment Protection Licence of the OEMP, Table 3 outlines the licence conditions. It is further addressed in section 1.2: Objective, which outlines that the objective of the OEMP is to ensure there is no offensive odour beyond the boundary of the site.</p> <p>2. EPA received odour complaints allegedly coming from the facility. SUEZ (now Veolia) responded to all questions raised by the EPA confirming no putrescible waste was received during the complaint period, no activities occurred outside of normal operations, all odour management measures were in place, therefore odour detected was determined to not be a result of the site operations.</p>																																																																												
Note	Section 129 of the <i>Protection of the Environment Operations Act 1997</i> , provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	Note only	NA	Note only																																																																												
L4	Other limit conditions																																																																															
Note	Asbestos: The licensee must comply with all conditions as specified in this licence or where no specific condition are outlined in this licence, the licence must comply with the Protection of the Environment Operations (Waste) Regulation 2014.	Note only	<p>1. Site inspection</p> <p>2. Audit interviews</p>	A separate bin, with a closed lid was observed on site for asbestos disposal. Site personnel confirmed tat all asbestos is inspected prior to offloading to confirm it is correctly contained.																																																																												
3	Operating Conditions																																																																															
O1	Activities must be carried out in a competent manner																																																																															

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O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Compliant	1. Training matrix 2. Audit interviews	All staff undertake a site induction, and are required to undertake additional training based on their role/job requirements. All training requirements are recorded in the training matrix (sighted during the audit interviews) and included the following information: '- personnel - training modules/requirements - traffic light system to trigger whether training has been completed /due (red = due, orange = coming up; green = complete; grey not applicable to personnel job requirements) - date completed Training refresher depends on the module - generally between 12 -36 months. e.g. High risk activities require 12 monthly refreshers. Additional training is disseminated to staff through: - Toolbox talks - e.g. Where changes occur to management plans. - Daily pre-starts - Incidents - all staff are debriefed the incident. - PIRMP scenarios are developed and enacted by staff to go through what the incident is, what	
O2	Maintenance of plant and equipment				
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Compliant	1. Audit interviews 2. Pre-operation checklist - mobile plant (daily)	site personnel confirmed that all "yellow gear" is leased from select civil, who undertake all maintenance of equipment (based on hours used). Daily pre-starts record the plant type and number, start and finish engine hours and a checklist that identifies anything requiring attention. These checklists are submitted to Select Civil. Internal machinery is maintained by the Repairs and maintenance team - all machinery goes through the same daily pre-operation checklist and maintenance is based on hours used / as required.	
O3	Dust				
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Compliant	1. Site inspection	The site is sealed and is regularly cleaned throughout the day. No evidence of dust generation was observed at the time of the site inspection.	
O4	Emergency response				
O4.1	The licensee must maintain an emergency response plan which documents the procedures to deal with all types of incidents (e.g. spill, explosions or fire) that may occur at the premises or outside of the premises (e.g. during transfer) which are likely to cause harm to the environment.	Compliant	1. Emergency Response Plan ver.8 (PLANS003.2.15, 23/07/2021) 2. Pollution Incident Response Plan 3. Audit interviews 4. IEA consultation letter (EPA, 5/07/2023) 5. Annual Returns (2020-2023)	EPA confirmed a fire occurred at the premises on 6 April 2022. While the EPA did not take any regulatory action, it reminded Veolia of its obligation under the POEO (General) Regulation 2021 that the Pollution Incident Response Management Plan (PIRMP) for the Premises is to be tested within one month of any pollution incident occurring. Site personnel confirmed that the PIRMP was tested after the incident occurred, however no evidence of this was able to be provided at the time of the audit. The Annual returns in include detail of the date tested and updated.	OFI-03
O5	Processes and management				
O5.1	The licensee must ensure that any general solid waste (non-putrescible) and/or general solid waste (putrescible) for processing, storage or resource recovery at the premises is assessed and classified in accordance with the EPA's Waste Classification Guidelines as in force from time to time.	Compliant	1. Mandalay - waste records 2020 - 2023 2. WARRP monthly reports 2020 - 2023 3. Audit interviews	Records are stored in the Mandalay system, however these will be transferred over to Veolia document control systems - currently going through process of identifying an appropriate program. Site personnel had good understanding of what items constituted non-conforming waste and how to manage its handling and disposal	
O6	Waste management: General Solid Waste (putrescible)				
O6.1	The licensee must keep general solid waste (putrescible) in a separate designated area from all other wastes received at the Premises	Compliant	1. Site inspection 2. Audit interviews	Waste was segregated on site to prevent cross contamination, for example: - waste oils / batteries stored on separate bunded trays - wood products stored in large skip bin - e-waste stored in small skip bin Waste storage areas signed site personnel also confirmed that where waste is identified as being across mingled - they segregate it where safe to do so.	

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O6.2	General solid waste (putrescible) must not be mixed with any other wastes received at the Premises.	Compliant	1. Site inspection 2. Audit interviews	Waste was segregated on site to prevent cross contamination, for example: - waste oils / batteries stored on separate bunded trays - wood products stored in large skip bin - e-waste stored in small skip bin Waste storage areas signed site personnel also confirmed that where waste is identified as being across mingled - they segregate it where safe to do so.	
O6.3	The licensee must remove all general solid waste (putrescible) within 24 hours of it being received at the Premises.	Non compliant	1. Audit interviews	site personnel confirmed that the majority of the time waste is cleared within 24 hours, however due to a change in operational hours, the site is closed between 4pm Saturday to 10pm on a Sunday, therefore if waste is received on a Saturday it remains on site for more than 24 hours (i.e.. not removed until Monday morning)	NC-03
4	Monitoring and Recording Conditions				
M1	Monitoring records				
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Compliant	1. Annual Returns 2020 - 2022 2. Audit interviews	Weekly odour monitoring records were sighted.	
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Compliant	1. Audit interviews	All records required are stored electronically and are currently in the process of being moved over from the SUEZ document control system to the Veolia document control system. Various records to demonstrate compliance with the EPL were provided for review.	
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Compliant	1. Environmental Noise Assessment (Hibbs, 2020-2021 and 2021 - 2022) 2. Weekly Odour monitoring forms 3. Audit interviews	Weekly odour monitoring occurs on site and the inspection checklist includes all items as listed in this condition. Noise assessments are undertaken on an annual basis to assess the noise emission performance of the site. Note: The EPL does not contain any limits for environmental noise.	
M2	Recording of pollution complaints				
M2.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Compliant	1. Complaints register 2. Audit interviews	All complaints are recorded and maintained in the complaints register in Intellex which was sighted during the audit interviews. Ne complaint was made within this audit period and was related to odour. Refer to Condition M2.2 for details.	
M2.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Compliant	1. Complaints register 2. SUEZ EPA response to alleged odour complaint (letter dated 14/02/2022) 3. Audit interviews	Complaints are received and managed in accordance with the Environmental Complaints Management Standard Operating Procedure. A summary of complaints received is published on the website (May / June 2023 only). The following complaints were made within the audit period: - EPA received odour complaints on 27/01/2022 allegedly coming from the facility. SUEZ (now Veolia) provided a response to the EPA's request closing out the investigation. No complaints were reported during the 2019-2020 and the current reporting period	
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Compliant	1. Complaints register 2. Audit interviews	All complaints are recorded and maintained in the complaints register in Intellex which was sighted during the audit interviews.	
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Not triggered	1. Audit interviews	EPA have not requested copies of the complaints register.	

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M3	Telephone complaints line	Compliant			
M3.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Compliant	1. Veolia website: https://www.veolia.com/anz/our-facilities/transfer-stations/wetherill-resource-recovery-facility	The website includes the following phone numbers: - a feedback phone number 1800 368 737 (24/7) - customer service 13 13 35 - general contact number 1300 651 116	
M3.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Compliant	1. Veolia website: https://www.veolia.com/anz/our-facilities/transfer-stations/wetherill-resource-recovery-facility	The website includes the following phone numbers: - a feedback phone number 1800 368 737 (24/7) - customer service 13 13 35 - general contact number 1300 651 116	
M3.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.	Note only	NA	Note only	
M4	Other monitoring and recording conditions: Monitoring of waste(s) received				
M4.1	The licensee must record the following information for each load of waste(s) received at the premises: (a) the registration number of the vehicle; (b) the time and date of receipt of the waste; (c) the source of the waste; (d) the type(s) of waste; and (e) the quantity of each type of waste (in tonnes).	Compliant	1. Audit interviews 2. WARRP Report (Mandalay 2020-2022)	Waste entering/exiting the site is tracked through the system called Mandalay.	
5	Reporting Conditions				
R1	Annual return documents				
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	Compliant	1. Annual returns (eConnect, 2019 - 2022)	Annual returns are submitted via eConnect on the approved form which complies with the requirements listed in this condition. Annual returns provided demonstrated each relevant section was completed. 2019-2020: - no pollution complaints - all conditions complied with - PIRMP tested on 15/04/2020, updated 26/5/2020 2020-2021: - 1 waste pollution complaint - 2 non compliance wit licence conditions - L2.2 and O6.3 - PIRMP tested on 9/07/2020, updated 5/02/2021 2021-2022: - 1 air pollution complaint - 2 non compliance wit licence conditions - L2.2 and O6.3 - PIRMP tested on 2/06/2022, updated 2/06/2022	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Compliant	1. Annual returns (eConnect, 2019 - 2022) 2. EPA POEO Public Register (EPL 4548)	Annual returns have been submitted in accordance with the requirements of this condition (these are listed on the EPA's website)	

**Wetherill Park Resource Recovery Facility
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Condition Ref	Requirement (Exact Wording)	2023 Audit Compliance Rating	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.	Not triggered	NA	Licence has not been transferred - this condition is therefore not relevant to this audit period.	
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Not triggered	NA	The site is operational - Licence has not been surrendered - this condition is therefore not relevant to this audit period.	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Compliant	1. Annual returns (eConnect, 2019 - 2022) 2. Annual return submission confirmation email (18/08/2022)	Annual returns are submitted electronically via eConnect. Copies of the 2019 - 2022 Annual Returns were provided during the audit interviews. The 2022 submission confirmation email was also sighted during the audit interviews	
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Compliant	1. Annual returns (eConnect, 2019 - 2022)	Annual returns are submitted electronically via eConnect and are accessible through the EPA website. Copies of the 2019 - 2022 Annual Returns were provided during the audit interviews.	
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Compliant	1. Annual returns (2020-2022) 2. Audit interviews	Annual returns are submitted electronically via eConnect on the approved form.	
Note	The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period. An application to transfer a licence must be made in the approved form for this purpose.	Note only	NA	Note only	
R2	Notification of environmental harm				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Not triggered	1. Audit interviews	Site personnel confirmed the there have been no incidents requiring notification to the Department within this audit period.	
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	Not triggered	1. Audit interviews	Site personnel confirmed that there have been no incidents requiring notification to the Department within this audit period. site personnel demonstrated knowledge of this requirement	
Note	The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Note only	NA	Note only	
R3	Written report				

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Condition Ref	Requirement (Exact Wording)	2023 Audit Compliance Rating	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Not triggered	1. Audit interviews	No written reports have been requested by an authorised officer. Therefore this condition is not triggered for this audit period.	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Not triggered	1. Audit interviews	No written reports have been requested by an authorised officer. Therefore this condition is not triggered for this audit period.	
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Not triggered	1. Audit interviews	No written reports have been requested by an authorised officer. Therefore this condition is not triggered for this audit period.	
6	General Conditions				
G1	Copy of licence kept at the premises or plant	Note only	NA	Note only	
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Compliant	1. Site inspection	A copy of the EPL was located on the noticeboard in the administration building.	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Not triggered	1. Audit interviews	A copy of the licence has not been requested by an authorised officer from the EPA.	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Compliant	1. Site inspection 2. Veolia website: https://www.veolia.com/anz/our-facilities/transfer-stations/wetherill-resource-recovery-facility	A copy of the EPL was located on the noticeboard in the administration building. A copy can also be obtained on Veolia's website	
7	Special Conditions				
E1	EPA may claim on Financial Assurance				
E1.1	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence or clean up notice issued under section 91 of the POEO Act.	Note only	NA	Note only to allow EPA to make a claim under section 303of the POEO Act.	
E2.1	Financial assurance				

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Condition Ref	Requirement (Exact Wording)	2023 Audit Compliance Rating	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
E2.1	<p>A financial assurance in the form of an unconditional and irrevocable guarantee from an Australian bank, building society or credit union in favour of the EPA in the amount of seventy five thousand (\$75,000) by 1 March 2008 must be provided to the EPA. The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p> <p>A financial assurance in the form of an unconditional and irrevocable guarantee from an Australian bank, building society or credit union in favour of the EPA in the amount of one hundred and fifty thousand (\$150,000) by 1 March 2009 must be provided to the EPA. The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p> <p>A financial assurance in the form of an unconditional and irrevocable guarantee from an Australian bank, building society or credit union in favour of the EPA in the amount of two hundred and twenty five thousand (\$225,000) by 1 March 2010 must be provided to the EPA. The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.</p>	Compliant	<p>1. Audit interviews 2. Extract showing financial assurance payment details</p>	Site personnel confirmed that the financial assurance for the facility has been in place since 1992 for the total amount of \$225,000 as per the requirements of this condition. The EPA have made no claims to date.	
E2.2	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure.	Compliant	<p>1. Audit interviews 2. Extract showing financial assurance payment details</p>	Site personnel confirmed that the financial assurance for the facility has been in place since 1992 for the total amount of \$225,000 as per the requirements of this condition. The EPA have made no claims to date.	
E2.3	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder	Compliant	<p>1. Audit interviews 2. Extract showing financial assurance payment details</p>	Site personnel confirmed that the financial assurance for the facility has been in place since 1992 for the total amount of \$225,000 as per the requirements of this condition. The EPA have made no claims to date.	
E2.4	The EPA may require an increase the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	Compliant	NA	Site is still operational. This condition is not relevant to the current audit period.	
E2.5	The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: a) the financial assurance required by condition E2.1, and b) the adjusted financial assurance as required by condition E2.2, E2.3 and E2.4.	Compliant	<p>1. Audit interviews 2. Extract showing financial assurance payment details</p>	Site personnel confirmed that the financial assurance for the facility has been in place since 1992 for the total amount of \$225,000 as per the requirements of this condition.	
E2.6	After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must: a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; b) rehabilitate the site, including conducting assessment of and if required remediation of any site contamination.	Not triggered	NA	Site is still operational. This condition is not relevant to the current audit period.	

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Condition Ref	Requirement (Exact Wording)	2023 Audit Compliance Rating	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
E2.7	<p>In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must:</p> <p>a) Make all efforts to contain all firewater on the licensee’s premises; b) Make all efforts to control air pollution from the licensee’s premises; c) Make all efforts to contain any discharge, spill or run-off from the licensee’s premises; d) Make all efforts to prevent flood water entering the licensee’s premises; e) Remediate and rehabilitate any exposed areas of soil and/or waste; f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of; g) At the request of the EPA monitor groundwater beneath the licensee’s premises and its potential to migrate from the licensee’s premises; h) At the request of the EPA monitor surface water leaving the licensee’s premises and i) Ensure the licensee’s premises is secure.</p>	Compliant	<p>1. Site inspection 2. Audit interviews</p>	<p>The site operates under an OEMP and subplans to prevent /minimise the likelihood of a pollution incident occurring: a) all water on site goes through trade waste as per the agreement with Sydney water b) dust and odour mitigation measures are implemented on site including: - installation of deodorising sprays over the vehicle entrance and exits - site is regularly cleaned - site is sealed in the shed to prevent the absorption of leachate c) spill kits are located in various locations around the site d) Site is banded to divert external water e) site is sealed or landscaped (no exposed areas were observed during the site inspection f) All waste is stored in an appropriate manner g) no request were received during this audit period h) onsite water is released offsite via the trade waste system as per the agreement with Sydney Water, water quality monitoring is undertaken and records maintained in the event EPOA request them i) site is fenced with lockable gates</p>	
E2.8	<p>While the licensee’s premises are being used for the purpose to which the licence relates, the licensee must:</p> <p>a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee’s employees or agents. b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.</p>	Compliant	<p>1. Site inspection 2. Audit interviews</p>	<p>Site inspections identified the following: (a) Spill kits are located at various locations on the site. There was no evidence of waste spilling outside of the terminal shed. Procedures are in place to minimise the potential for waste to move beyond the site boundary. (b) Systems for identifying and removing non-conforming waste were observed during the audit. Waste bins for steel and gas cylinders for recycling are located near the diesel tank area (c) All monitoring data is available on the Veolia CTT website.</p>	

APPENDIX E SITE INSPECTION PHOTOS



Figure 2. Entrance to the site well maintained.



Figure 3. Truck route through the site well maintained..



Figure 4. Rear of site well maintained.



Figure 5. Inside shed near compacter clean and well maintained.



Figure 6. Site cleaning.



Figure 7. Waste segregation bins at the rear of the site.

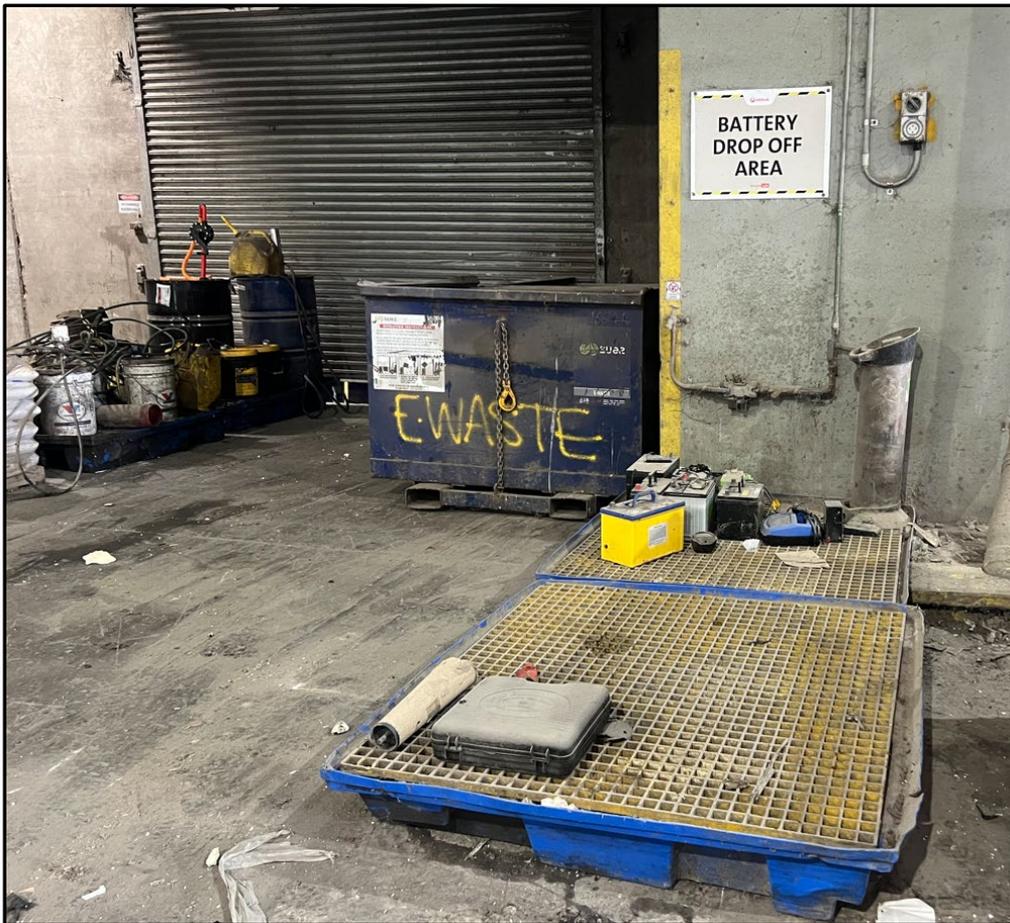


Figure 8. Waste segregation inside receive shed.



Project name: **Independent Environmental Audit - Wetherill Park Resource Recovery Facility**

APPENDIX F IEA ACTION PLAN

**Wetherill Park Resource Recovery Facility
2023 Independent Environmental Audit
Audit Recommendations**

Recommendation Identification	Relevant Condition / Section	Finding	2023 Recommendation	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
NC-01	A1	The Applicant generally demonstrated compliance with the requirements of this consent with the exception of the non conformances identified for conditions as outlined below.	Implement all recommendations and actions identified as part of the 2023 Independent Environmental Audit within the specified timeframes. Refer to NC-05 and NC-06 for specific details.	Refer to NC-05 and NC-06 for details. Refer to the Proponents proposed actions for all non-conformances.	Refer to NC-05 and NC-06
	A2				
NC-02	A8	An exceedance of the waste limit occurred on 8 March 2022 where several waste facilities were required to divert waste to the Wetherill Facility as a result of a significant rainfall event. EPA were notified and to prevent a re-occurrence, Veolia reported that material levels on site would be maintained as low as reasonably practicable in preparation for future flood events. Material on site was transported to alternate licence facilities and landfill on 9 March 2022. EPA notified and the exceedance was also reported in the Annual Return.	This non conformance was a result of a weather event outside of the facility's control and was reported to the EPA. This non conformance did not result in a penalty notice. The applicant is to continue to monitor weather events and ensure waste that is accepted, processed onsite does not exceed the limits as outlined in this condition	A new weather station has been installed. Weather will continue to be monitored and in the event significant rainfall is predicted: •material levels will be maintained on site as low as reasonably practicable •waste will be diverted to other sites if material levels are approaching capacity	Ongoing
	EPL L2.2				
NC-03	A9	A change in operational hours means the site no longer operates 24/7. The site is closed between 4pm Saturday to 10pm on a Sunday, therefore if waste is received on a Saturday it remains on site for more than 24 hours.	Prepare and submit a modification to the consent requesting a change in wording to this condition to reflect the facilities operating hours.	A modification of the existing consent will be considered.	December 2023
	EPL O6.3				
NC-04	A27	An interim certificate has been issued, however a final certificate is yet to be issued. Site personnel confirmed that the final certificate will be issued at the completion of stage 2 construction (currently going through a modification) .	Continue to progress with the modification for stage 2. Obtain final certification upon completion of stage 2 construction	Modification 2 has been submitted and is currently going through the approval stage with the Department	December 2023
NC-05	B4	Water sampling confirmed that there was one exceedance of water quality (sample collected 2/02/2022) for sulfate and pH against the consent to discharge requirements. In accordance with Schedule 2 of the discharge consent, the monitoring schedule and reporting to Sydney Water forms part of the determination of trade wastewater charges (as outlined in Schedule 3).	No action required. Non conformance is reported to Sydney Water and determines charges to trade wastewater as opposed to an infringement being issued.	Wastewater will continue to be monitored and reported as required by the Trade Waste Agreement with Sydney Water	Ongoing
NC-06	B5	Site personnel confirmed that the installation of the first flush system is still in progress. Evidence of it being ordered was sighted during the audit interviews as well as confirmation that is expected to be installed by the end of July 2023. Note: this was identified as a NC in the 2020 audit with a proposed action to install a first flush system. This non conformance remains open for the purposes of this audit.	Install the first flush system and provide evidence once works are complete and that it has been installed/certified by a suitably qualified person.	A work order has been submitted for the installation of the first flush system.	December 2023
	B23(b)	The system has a keystone valve that can be turned off to prevent release to stormwater. The valve undergoes annual inspection (Matic plumbing). The EIS includes a first flush system in the design. The first flush system has not been installed to date			
OFI-01	B39	Oils were observed to be stored inside the shed on bunded pallets. One 5L container of coolant was observed to be located outside of the bunded pallets, however it was on a sealed area.	Undertake refresher training / toolbox meeting with all site personnel to remind them of the requirements for the storage of all chemicals, fuels and oils on site in accordance with the relevant Australian Standards and EPA guidelines	Staff will be reminded of the storage of all chemicals, fuels and oils on site. Regular sites inspections will continue to ensure appropriate storage and handling of chemicals, fuels and oils	December 2023
	B41	Spill trays were also observed onsite, however general rubbish was observed in these trays.			
OFI-02	C11	At the time of this IEA the most recent version of the following documents were published in the website: - 2020 IEA - Annual Returns - Annual Environmental Management Review - Odour monitoring - Noise assessments - Complaints register It was noted that historical documents, monitoring data etc were not published.	Ensure all historical documents, reports and monitoring data are published on the website as per the requirement of this condition.	Migration of all historical documentation to the new document control system will continue. All documents required to be published on the sites website will continue to be uploaded as required.	December 2023

	C14	Documents as required by this condition were published on the website, however it was noted that only the most recent reports/monitoring data were published.			
OFI-03	EPL O4.1	EPA confirmed a fire occurred at the premises on 6 April 2022. While the EPA did not take any regulatory action, it reminded Veolia of its obligation under the <i>POEO (General) Regulation 2021</i> that the Pollution Incident Response Management Plan (PIRMP) for the Premises is to be tested within one month of any pollution incident occurring. Site personnel confirmed that the PIRMP was tested after the incident occurred, however no evidence of this was able to be provided at the time of the audit. The Annual returns include detail of the date tested and updated.	Ensure evidence of the PIRMP test is captured in a debrief report or similar that outlines the drill/test undertaken, persons involved, learnings and actions to be implemented. Note: Other Veolia sites undertake these and have templates developed that could be utilised.	Evidence of PRIMP tests will be documented and maintained in the document control system. Any learning will be shared with site personnel and where appropriate, other sites. If required the PIRMP will be updated based on the outcomes of the test.	Ongoing

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