



DA205-08-01 Independent Environmental Audit Report

**Veolia Australia and New Zealand
Clyde Waste Transfer Terminal - IEA
SAA220002.01
9 March 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 Clyde Waste Transfer Terminal (CTT) (the site). This document outlines the method, findings, and recommendations of the 2022 IEA. The IEA was undertaken between December 2022 to February 2023. The IEA scope included activities undertaken at the site during the period December 2021 to December 2022.

The purpose of the IEA was to address the requirements of Condition 60 of the development consent (DA 205-08-01) and assess overall compliance and environmental performance of the site. In accordance with Condition 60 b) 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 2021 IEA (Epic Environmental, 2021)
- Conditions of DA 205-08-01
- Conditions of EPL 11763
- Requirements within the CTT draft 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 99% compliance against all of the IEA criteria for the 2022 IEA. A total of 287 individual requirements / conditions were audited across the IEA criteria, with 84 requirements / conditions determined to be not triggered at the time of the IEA. A total of three audited requirements / conditions were identified to be non-compliant during the IEA.

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 training provided to staff and drivers, comprehensive management plans, effective management of the environmental risks on-site and evidence of continual improvements between 2021 and 2022.

The key non-compliances identified during the IEA include:

- Development Consent condition 50: Traffic Management Plan (TMP):
 - The 2021 audit identified that the TMP did not address all requirements of this condition. Evidence of substantial progress on the action to request a modification to consent conditions was observed during the audit. The audit finding remains as a NC until the action is closed out
- Development Consent condition 66: Waste Management Plan (WMP):
 - The WMP did not include provision for the identification of asbestos as required by the condition
- Development Consent condition 114: Noise Management:
 - The 2021 audit identified that an induction program for rail noise mitigation had not been actioned and the condition was not achievable and out of Veolia's scope control. Evidence of substantial progress was observed during the audit. The audit finding remains as a NC until the action is closed out

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:

- Complete the actions proposed in the 2021 audit to obtain a modification to consent conditions 50: Traffic Management Plan and 114: Noise Management
- Review and update the Waste Management Plan to include detail for training provided to staff for the identification of asbestos in waste

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 INTRODCUTION

Epic Environmental Pty Ltd (Epic) has been engaged by Veolia Australia and New Zealand (Veolia) to undertake an Independent Environmental Audit (IEA) of the Clyde Transfer Terminal (CTT). The IEA was undertaken between 13 December 2022 and 3 February 2023. This document outlines the method, findings, and recommendations of the 2022 IEA undertaken at the CTT.

1.1 Background

Veolia operates the CTT at 322A Parramatta Road, Auburn, New South Wales (the site). The site operates under Development Consent (DA 205-08-01) and Environment Protection Licence (EPL 11763). The site is approved to receive up to 600,000 tonnes of mixed household and commercial waste per annum, which is transported by rail to Veolia’s site at Woodlawn, near Tarago NSW, for treatment and resource recovery.

The site consists of the following:

- Transfer building including waste compactors, leachate containment and odour controls
- Bitumen hardstand area for container storage
- Rail siding for loading/unloading containers to/from trains
- Office and amenities
- Entrance/exit connecting to Parramatta Road
- Weighbridge office and weighbridge
- A stormwater oil/silt separator and retention pond

1.2 IEA Team

The IEA team members are listed in **Table 1**. In accordance with Condition 60 b) of the Development Consent, 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	Audit Support	16	BSci (Environmental Management), Auditor Training (Lead Auditor)
Romin Nejad	Technical Review	17	Lead Auditor (Exemplar Global, No. 115361), BEng (Env), Gcert Env Mgmt, Gcert Carbon Mgmt, MBA

1.3 1IEA Objective

As per Condition 60 of the development consent for the site, an IEA is required to be undertaken every year 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 (Epic, 2021)
- Assess whether the site is operated in compliance with the approval conditions listed under the:
 - Development consent (DA 205-08-01)
 - Environment protection licence (EPL 11763)
- 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 (December 2021 – December 2022) at the site in relation to the operation of the terminal with respect to the development consent (DA 205-08-01), environmental protection licence (EPL 11763), Operational Environmental Management Plan (OEMP) and relevant environmental sub-plans.

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		
21/11/22	Provision of IEA Plan to Veolia	Epic
16/11/22	Kick-off meeting with Veolia	Epic
17/11/22	Approval of the IEA team	DPIE
25/11/22	Developed the IEA tools	Epic
30/11/22	Undertook the preliminary document review	Epic
IEA Phase		
13/12/22	Opening Meeting	Epic & Veolia
13/12/22	Site inspection	Epic & Veolia
14/12/22 – 15/12/22	IEA interviews	Epic & Veolia
19/12/22	Closing Meeting	Epic & Veolia
IEA Reporting		
28/02/23	Provision of additional evidence not available during the IEA Phase	Veolia
28/02/23– 08/03/23	Prepare the draft IEA report	Epic
08/03/23	Issue the draft IEA report to Veolia	Epic
09/03/23	Veolia provides comments on draft IEA report	Veolia
09/03/23	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 16 November 2022 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 2021 IEA (Epic, 2021)
- Conditions of DA 205-08-01
- Conditions of EPL 11763

- Requirements within the Clyde Waste Transfer Terminal Operational Environmental Management Plan (the OEMP) and the following sub-plans:
 - Environmental Monitoring Program (EMP)
 - Waste Management Plan (WMP)
 - Air Quality Management Plan (AQMP)
 - Traffic Management Plan (TMP)
 - Vermin And Pest Control Plan (VCMP)
 - Stormwater Management Plan (SMP)
 - Site Contamination Management Plan (SCMP)
 - Noise Management Plan (NMP)
 - Emergency Response Plan (ERP)

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.
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:

- Site Manager – Rod Jones
- Environmental Team – Anae Ressos and Nicole Boukarim
- Leading Hand – Sioi Mataele

Interviews were undertaken in person at the Veolia CTT site.

2.8 Site Inspections

A site inspection was undertaken following the IEA interviews to visually verify those aspects that could not be confirmed during the IEA interviews. Weather on the day of the site inspection was overcast, with a low of 10.2°C with a high of 26°C (BOM, 2022 – Parramatta weather station). Approximately 9.4 mm of rain fell on the day of inspection at the Paramatta weather station. During the seven days prior to the site inspection Parramatta weather station recorded 4.0 mm of rain.

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 the current and draft sub-plans
- 2021 -2022 annual environmental management report (AEMR)
- Clyde odour audit – reports:
 - Odour Audit XXXVIII March 2022
 - Odour Audit XXXIX June 2022
- 2021 annual truck noise measurements report (November 2021)
- Clyde independent audit final report 2020 & 2021
- 2022 Annual Returns
- Waste Records for 2022
- Weekly and monthly inspection records for 2022
- Site induction, driver induction and training records
- Environmental incident records for the IEA
- Weighbridge calibration records
- 2022 extraction fan maintenance records
- 2022 Weather station service records
- 2022 Community newsletters
- Stakeholder correspondence
- Waste levy reporting records
- Vermin and pest contractor report
- Veolia waste classification flowchart
- The following work instructions and procedures:
 - Weighbridge operators work instruction
 - Waste shed dust suppression system
 - Exceedances notification work instruction
 - Compactor pit operations
 - Control of non-conforming waste procedure
- DPE approval of the environmental management representative
- Position description of the environmental management representative and facility manager
- SHEQ objectives
- Evidence of ERP testing in 2022
- Vehicle (loaders) daily checklists and service reports

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

3 IEA FINDINGS

3.1 Overall IEA Results

A total of 287 individual requirements / conditions were audited across the IEA criteria, with 84 requirements / conditions determined to be not triggered at the time of the IEA. Of the applicable requirements and conditions, Veolia demonstrated compliance against 99% of the IEA criteria. This equated to a total of three audited requirements / conditions that were identified as NC.

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

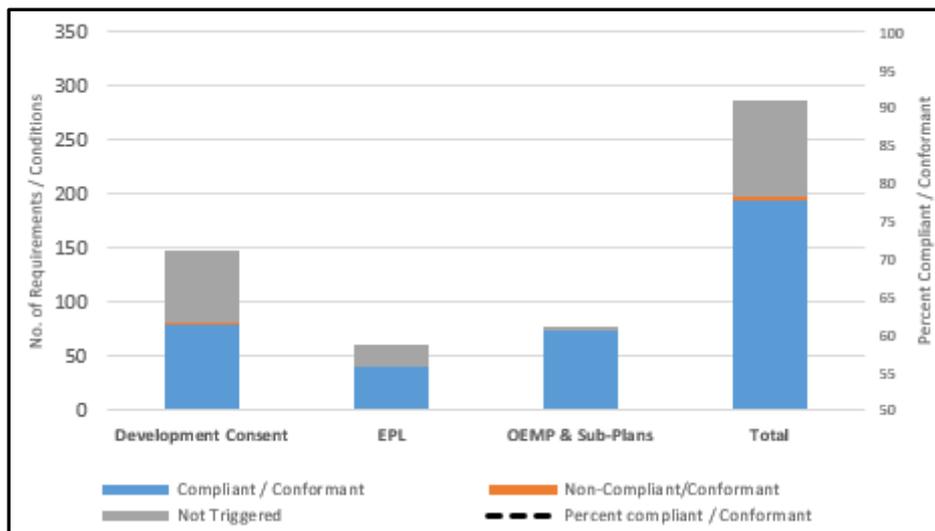


Figure 1. Overall IEA results

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:
 - Examples of on-going continual improvements were observed between the IEA 2021 and IEA 2022
 - Veolia demonstrated 100% compliance with the EPL, OEMP and associated sub-plans
 - Environmental monitoring and maintenance record management was of a high level and all evidence was easily identified by the environmental team
 - 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 and no evidence of dust nuisance or waste migrating offsite was observed (**Appendix E- Plates 1 - 3**)
 - CCTV footage of the terminal building floor was accessible in various areas of the office including meeting rooms as an added level of surveillance ensuring the terminal floor was being managed in accordance with the development consent (**Appendix E- Plate 4,**)
 - Internal and external areas of the site were well presented and maintained (**Appendix E- Plates 5 - 6**)
 - Facilities were provided for the collection of non-conforming and recyclable waste (**Appendix E- Plates 7-8**)
 - Service records were maintained on site and up to date (**Appendix E- Plate 9**)



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 2021 IEA Findings

The 2021 IEA provided 14 recommendations related to two NCs and twelve opportunities for improvement. Of the 14 recommendations, the 2022 IEA identified nine that were completely addressed and five that were open and had evidence of substantial progress.

The status of each of the 2021 IEA recommendations is provided in **Table 4**.

Table 4. Status of 2021 IEA Recommendations

Reference	Recommendation (2021 IEA)	Findings (2022 IEA)	Status
Development Consent (DA 205-08-01)			
Condition 50	<p>Prepare and lodge a modification to the development consent that removes the requirement for Veolia to enforce punitive measures to non-conforming customers. As part of the modification Veolia should propose a revised condition that requires Veolia to provide further training with offending drivers.</p> <p>In addition, a modification should propose an alternative to recording any non-complying vehicle as it is unreasonable for Veolia to provide constant monitoring of the intersection. The alternative should require Veolia to propose a sample event monitoring program at regular reoccurrences (e.g. attended monitoring for four continuous hours, once every three months) to record the number of trucks complying with the "left hand turn" requirements. For non-complying trucks Veolia should be providing additional training to those trucking companies.</p>	<p>Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 50 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.</p>	Open, evidence of substantial progress was observed.
Condition 54	<p>Provide a copy of the Noise Management Plan (NMP) to Pacific National and Cumberland Council for review and comment.</p>	<p>Site personnel confirmed that the NMP was submitted to stakeholders for feedback, however Veolia have not received any comments to date.</p>	Addressed and no further action required.
Condition 63	<p>Prepare and lodge a modification to the development consent that adjusts the condition to contemporary guideline references.</p>	<p>Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 63 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.</p>	Open, evidence of substantial progress was observed.
Condition 87	<p>Prepare and lodge a modification to the development consent that removes the requirement for monitoring of the forced ventilation system in accordance with the EPL. As EPL 11763 does not require monitoring of the forced ventilation system, condition 87 should be updated to remove any ambiguity.</p>	<p>Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 87 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.</p>	Open, evidence of substantial progress was observed.

Reference	Recommendation (2021 IEA)	Findings (2022 IEA)	Status
Condition 113	Implement the online driver induction process across the CTT customer base.	The online driver induction has been implemented and was sighted during the audit interviews.	Addressed and no further action required.
Condition 114	Prepare and lodge a modification to the development consent that replaces the requirement for Veolia to undertake training with rail operators and change this to a requirement for Veolia to verify the existing training programs provided by the rail operators are suitable to minimise the risk of nuisance being caused to neighbouring properties. Discuss and verify the training provided by Pacific National to its drivers to ensure sufficient to meet the requirements of the condition.	Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 114 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.	Open, evidence of substantial progress was observed.
Condition 136	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to establish and maintain a trust fund for a Community Consultative Committee.	Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 136 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.	Open, evidence of substantial progress was observed.
Environmental Protection Licence (EPL 11763)			
M4.1	Prepare a specific work instruction for the community complaints line and train all staff on the process for the receipt and recording of community complaints.	A dedicated hotline number is available on the Veolia CTT website. All complaints are managed by the weighbridge operators who are trained in complaints handling.	Addressed and no further action required
Operational Environmental Management Plan and Subplans			
Operational Environmental Management Plan (OEMP) s4.2.2.1	Update the OEMP to have a 2-yearly re-training program for any site-specific environmental training. Remove the requirement to have site-specific training reassessed twice in the first year.	A review of section 4.2.2.1 of the OEMP confirmed that reference to retraining requirements had been included and the requirement for reassessment of site-specific training in the first year had been removed as recommended.	Addressed and no further action required.
Waste Management Plan (WMP) s4.3	Remove the commitment to identify waste material that is odorous or dusty and prioritise such waste for compaction.	A review of section 4.3 of the WMP (Rev 0.5 – draft) confirmed that the commitment to identifying odorous or dusty waste material had been removed as recommended.	Addressed and no further action required.

Reference	Recommendation (2021 IEA)	Findings (2022 IEA)	Status
WMP s4.4.1	Remove the commitment for the weighbridge attendant to have printed material available for provision to drivers.	A review of section 4.4.1 of the WMP (Rev 0.5 – draft) confirmed that reference to printed material available for provision to drivers had been removed as recommended.	Addressed and no further action required.
WMP s4.4.1.1	Update the section of the WMP to reflect the actual process for measures taken in the event of breaches of waste acceptance criteria, including notifying offending companies.	A review of section 4.4.1.1 of the WMP (Rev 0.5 – draft) confirmed that the process for measures taken in the event of breaches in waste acceptance criteria had been included as recommended.	Addressed and no further action required.
Noise Management Plan (NMP) s4.2.3	Remove the requirement for Veolia to have any responsibility for assets that are under the operational control of other organisations.	A review of section 4.2.3 of the NMP (Rev 0.5 - draft) confirmed that this section has been removed as recommended.	Addressed and no further action required.
Environmental Monitoring Program (EMP) s2	Update the EMP to include the surface water monitoring program implemented at the CTT.	A review of the EMP confirmed that details for stormwater (surface water) monitoring had been included as recommended.	Addressed and no further action required.

3.4 Development Consent

Veolia was found to be 97% compliant with the conditions of the DA 205-08-01. Notable observations of compliance included:

- Monitoring (including noise, odour and waste monitoring) required by the conditions of consent were up to date and complete
- Monitoring reports, IEA reports, AEMRs and the OEMP were available on the Veolia website for CTT
- Key equipment maintenance records were complete
- The required waste records were maintained and up to date
- Stormwater management on the site was undertaken in accordance with the conditions
- Comprehensive training was provided to personnel

A total of three NCs were identified during the IEA, two of which remain open from the 2021 IEA and one new NC:

Outstanding NC's:

- **Condition 50:** The 2021 IEA identified that the TMP mostly addressed the consent condition, with the exception of Veolia not having:
 - *A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the "left turn only" restriction upon entering or leaving the premises via Parramatta Road*
 - *An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached*
- **Condition 114:** The condition requires Veolia to implement an induction program with Pacific National (rail operator) for all train drivers and other rail staff. The 2021 IEA identified that the required training program had not been developed and the NMP did not include specifications for such a training program

The 2021 IEA action to submit a modification to the development consent for the two conditions above, has been submitted to the Planning Secretary, however it has not been fully resolved, therefore it remains a NC until the action is closed out (i.e. an approved modification).

New NC:

- **Condition 66:** The Waste Management Plan does not make provision for identification of asbestos in waste received at the premises and for the proper and safe disposal of any asbestos identified as required by the condition.

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

3.5 Environmental Protection Licence

Veolia was found to be 100% compliant with the conditions of the EPL 11763. Notable observations of compliance included:

- No evidence of unauthorised environmental harm was observed during the audit
- Comprehensive training was provided to facility personnel
- Site personnel demonstrated knowledge and understanding of their environmental obligations
- Environmental monitoring, equipment calibration and waste records were up to date and well maintained
- Records of emergency response drills being undertaken to confirm adequacy of the plans and records of the learnings and actions being disseminated to staff were confirmed to be in accordance with the requirements of the EPL

No recommendations for improvement were identified.

3.6 OEMP & Associated Sub-Plans

To verify implementation of the draft OEMP and associated sub-plans, the IEA verified conformance with 78 selected requirements within these documents. Veolia was found to be 100% conformant with the audited requirements of the OEMP and associated sub-plans.

Notable observations of conformance included:

- Personnel interviewed on site demonstrated a good understanding of their roles and responsibilities with regard to implementing the OEMP and subplans:
 - Personnel were able to easily describe the process for waste identification and monitoring processes on site
- The site was well maintained:
 - The waste floor shed regularly cleared of waste each day
 - Container area was neat with no evidence of litter
 - “non accepted waste” was stored in specified areas/containers
 - Monitoring systems installed to assist with the identification of non-accepted waste
- Monitoring and maintenance records were up to date and well maintained

Recommendations to address identified areas for improvement have been provided in **Section 4**.

3.7 Environmental Performance

Monitoring records were observed for the IEA period and demonstrated a high level of environmental performance across the site. The high-level of environmental performance was further verified during the site inspection.

3.8 Complaints

No complaints were received during the IEA period.

3.9 Incidents

No environmental incidents were noted during the IEA period.

3.10 Non-compliances

A total of three NCs were identified during the IEA. Recommended actions to the address each of these matters has been provided in **Table 5**. Veolia should consider these recommendations and implement as appropriate or propose alternative actions to address identified NCs.

Table 5. Recommendations to Resolve Identified NCs

Unique Identification	Relevant Condition / Section	Recommendation
CTT-DA-NC-01	50	<p>Complete the action from the 2021 IEA:</p> <ul style="list-style-type: none"> Prepare and lodge a modification to the development consent that removes the requirement for Veolia to enforce punitive measures to non-conforming customers. As part of the modification Veolia should propose a revised condition that requires Veolia to provide further training with offending drivers. <p>Note: This condition was identified as a NC in the 2021 IEA with an action to request that this condition be amended. Veolia submitted a request for modification to consent conditions (14/3/2022) requesting that the condition be changed. The decision to amend the condition is yet to be approved by DPE, therefore the NC is to remain open and the status to be confirmed during the 2023 IEA.</p>
CTT-DA-NC-02	66	<p>Review and update the Waste Management Plan to include detail for training provided to staff for the identification of asbestos in waste.</p>
CTT-DA-NC-03	114	<p>Complete the action from the 2021 IEA:</p> <ul style="list-style-type: none"> Prepare and lodge a modification to the development consent that replaces the requirement for Veolia to undertake training with rail operators and change this to a requirement for Veolia to verify the existing training programs provided by the rail operators are suitable to minimise the risk of nuisance being caused to neighbouring properties. <p>Note: This condition was identified as a NC in the 2021 IEA with an action to request that this condition be amended. Veolia submitted a request for modification to consent conditions (14/3/2022) requesting that the condition be changed. The decision to amend the condition is yet to be approved by DPE, therefore the NC is to remain open and the status to be confirmed during the 2023 IEA.</p>

3.11 Opportunities for Improvement

A total of six opportunities for improvement were identified during the IEA. These opportunities for improvement have been listed as recommendations in **Table 6**. Veolia should consider and implement these recommendations, as appropriate, to improve the overall environmental performance of the site.

Table 6. Recommendations for Opportunities for Improvement

Unique Identification	Relevant Condition / Section	Recommendation
CTT-DA-OFI-01	45	Finalise the training matrix and develop a centralised location within the Veolia document control system for the storage and maintenance for training records of all personnel
CTT-DA-OFI-02	56	Review and update the Environmental Monitoring Program (MAN-14012) to include detail describing: <ul style="list-style-type: none"> How monitoring will be recorded and reported to the Director-General and other relevant authorities Actions to be taken and procedures to be followed if any non-compliance is detected Alternatively - replicate Table 5.4 from the OEMP into the EMP.
CTT-DA-OFI-03	102	Review and update the Stormwater Management Plan (MAN-14636-1) to include detail of new infrastructure and its purpose/function (i.e. the installation of the automatic gate and float).
CTT-DA-OFI-04	134	Prepare and lodge a modification to the development consent that removes the requirement for Veolia to maintain a Community Consultative Committee.
CTT-DA-OFI-05	135	Prepare and lodge a modification to the development consent to remove this condition. The Community Consultative Committee was unsuccessful; therefore, the requirements of this condition are not relevant.
CTT-MP-OFI-01	OEMP 4.2.2.1	OEMP: Prepare a standardised training package for all site personnel that specifically addresses: <ul style="list-style-type: none"> OEMP and related documents Site environmental objectives and targets Understanding individual authorities and responsibilities Significant project aspects, impacts and controls Potential consequences of departure from procedures Emergency procedure and response Understanding the legal obligations

4 CONCLUSION

This document outlines the method, findings, and recommendations of the 2022 IEA undertaken by Epic at the CTT. The IEA was undertaken in accordance with Condition 60 & 61 of the Development Consent (DA 205-08-01). The IEA was conducted to:

- Assess the level of compliance against the conditions of approval
- 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 December 2022 and February 2023 and captured evidence for the period December 2021 to December 2022. The IEA criteria used for the IEA, including the findings of the 2021 IEA, Conditions of DA 205-08-01, Conditions of EPL 11763, the OEMP, and the associated sub-plans. A total of 287 individual requirements / conditions were audited across the IEA criteria, with 84 determined to not be triggered at the time of IEA and three non-compliances (two remain open from the 2021 audit and one new NC). Veolia demonstrated compliance against 99% the IEA criteria.

The key non-compliances identified during the IEA include:

- Development Consent condition 50: Traffic Management Plan (TMP):
 - The 2021 audit identified that the Traffic Management Plan did not address all requirements of this condition, with an action to request a modification to consent conditions. Evidence of substantial progress was observed during the audit; however, the action is yet to be closed out, therefore the audit finding remains as a NC
- Development Consent condition 66: Waste Management Plan (WMP):
 - The WMP did not include provision for the identification of asbestos
- Development Consent condition 114: Noise Management:
 - The 2021 audit identified that an induction program for rail noise mitigation had not been actioned and the condition was not achievable and out of Veolia's scope control. The 2021 audit action was to request a modification to consent conditions. Evidence of substantial progress was observed during the audit; however, the action is yet to be closed out, therefore the audit finding remains as a NC

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.

5 REFERENCES

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

Epic Environmental Pty Ltd, 2021, Clyde 2021 Independent Audit Report - Clyde Waste Transfer Terminal, Sydney, New South Wales

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

6 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 Clyde Transfer Terminal located in Clyde NSW. All interpretations, findings 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:

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- 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.

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Project name: 2022 Independent Environmental Audit - Clyde Waste Transfer Terminal

APPENDIX A PLANNING SECRETARY IEA TEAM APPROVAL

Anae Ressos
Veolia Environmental Services P/L
L4, 65 Pirrama Road
Pyrmont NSW 2009

17/11/2022

Dear Ms Ressos

**Clyde Waste Transfer Terminal (DA205-08-01)
Independent Auditor Endorsement**

I refer to your request (DA205-08-01-PA-23) 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 Clyde Waste Transfer Terminal development (the **development**) DA205-08-01, 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 Secretary I endorse the appointment of the following audit team from Epic Environmental Pty Ltd:

- Kirsty Douglas as lead auditor;
- Chris Griffiths as assistant auditor;
- Natalie Chandra as assistant auditor; and
- Romin Nejad as assistant auditor.

to undertake the Independent Audit for the development, in accordance with Condition 60 of the consent and the department's *Independent Audit Post Approval Requirements (2020)* (**IAPARs**).

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the requirements of the consent and IAPARs. 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.

Department of Planning and Environment



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

Yours sincerely

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

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary



Project name: 2022 Independent Environmental Audit - Clyde Waste Transfer Terminal

APPENDIX B INDEPENDENT AUDITOR DECLARATION FORM

Independent Audit Report Declaration Form	
Project Name	Clyde Waste Transfer Terminal – Independent Environmental Audit
Consent Number	205-08-01
Description of Project	The Waste Transfer Terminal is licensed to accept general solid wastes (both putrescible and non-putrescible). These wastes are received in an enclosed building and compacted into custom modified shipping containers for transport by rail to Veolia’s Woodlawn Bioreactor.
Project Address	322 Parramatta Road, Clyde, NSW 2124
Proponent	Veolia Australia and New Zealand
Title of Audit	Independent Environmental Audit
Date	9/03/2023

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	
Project Name	Clyde Waste Transfer Terminal – Independent Environmental Audit
Consent Number	205-08-01
Description of Project	The Waste Transfer Terminal is licensed to accept general solid wastes (both putrescible and non-putrescible). These wastes are received in an enclosed building and compacted into custom modified shipping containers for transport by rail to Veolia’s Woodlawn Bioreactor.
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Proponent	Veolia Australia and New Zealand
Title of Audit	Independent Environmental Audit
Date	9/03/2023

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- 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: 2022 Independent Environmental Audit - Clyde Waste Transfer Terminal

APPENDIX C IEA PLAN



Audit Plan

**Veolia Australia and New Zealand
Veolia - Clyde Waste Transfer Terminal IEA 2022
SAA220002.001
21 November 2022**

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DOCUMENT CONTROL

Revision	Revision date	Revision details	Author	Editorial review	Technical review	Approver
A	21/11/2022	Draft for Internal Review	KD	RN	RN	KD
0	21/11/2022	Final for Issue	KD	RN	RN	KD

DISTRIBUTION

Revision	Revision date	Issued to
0	22/11/2022	Anae Ressos, Veolia Australia and New Zealand
1	29/11/2022	Anae Ressos, Veolia Australia and New Zealand

DOCUMENT INFORMATION

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Author:	Kirsty Douglas
Project manager:	Kirsty Douglas
Client:	Veolia Australia and New Zealand
Document title:	Audit Plan
Project number:	SAA220002.001

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 Clyde Waste Transfer Terminal (the site). This document provides a detailed IEA plan to guide the execution and reporting of the 2022 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 60 of the development consent (DA 205-08-01) for the site, an IEA is required to be undertaken every year to ensure ongoing compliance of environmental obligations at the site. This IEA has been undertaken to address Condition 60 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 waste transfer terminal.

1.2.1 IEA Period

The IEA period will be between December 2021 and December 2022 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 the:
 - Development consent (DA 205-08-01)
 - Environment protection licence (EPL 11763)
- 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 2021 IEA (Epic 2021)
 - Conditions of the DA 205-08-01
 - Commitments within the Clyde Waste Transfer Terminal Operational Environmental Management Plan (the OEMP) and the following sub-plans:
 - Environmental monitoring program.
 - Waste management plan.
 - Odour management plan.
 - Dust management plan.
 - Traffic management plan.
-

- Vermin and pest control plan.
- Stormwater management plan.
- Site contamination management plan.
- Noise management plan.
- Incident response plan.
- Conditions of EPL 11763



2 IEA PLANNING

2.1 IEA Team

The IEA team members have been provided in **Table 1**. In accordance with Condition 60 b) of the development consent. A request for approval of the IEA team has recently been submitted with the Director-General.

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	Auditing Assistant	16	BSci (Environmental Management), Auditor Training (Lead Auditor)

2.2 Veolia Staff Participation Requirements

2.2.1 Veolia Representative

Anae Ressos (Environmental Coordinator) 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 Chris Griffiths (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 Team –Anae Ressos
- Facilities Manager – Rod Jones
- Environmental Compliance Advisor – Nicole Boukarim
- Leading Hand/s – Person/s to be determined during the sit visit

Interviews will be held via teleconference. A separate interview session will be scheduled with each interviewee. 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 liaise with relevant parties to obtain access and will be available to escort the IEA team inspector 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 Chris Griffiths (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	21/11/22	Preparation and provision of IEA Plan to Veolia	Email	Epic
17:00	25/11/22	Provision of management plans required for the IEA	Email	Veolia
09:00 – 17:00	28/11/22	Undertake a preliminary document review	Epic Offices	Epic
09:00 – 17:00	28/11/22	Develop the IEA tools	Epic Offices	Epic
IEA Phase				
08:00	13/12/22	Opening Meeting	Teleconference	All
09:00-16:00	13/12/22	Site inspection	Site	Epic & Veolia
All day	14/12/22 – 15/12/22	IEA Interviews	Teleconference	Epic & Veolia
10:00-10:30	19/12/22	Closing Meeting	Teleconference	All
IEA Reporting				
17:00	20/12/22	Provision of additional evidence not obtained during the IEA phase.	Email	Veolia
17:00	21/12/22 – 23/12/22	Prepare the draft IEA report	Epic Offices	Epic
17:00	23/12/22 – 9/01/22	Christmas Shutdown	-	-
17:00	13/01/23	Issue the draft IEA report to Veolia	Email	Epic
17:00	20/01/23	Veolia provides comments on draft IEA report	Email	Veolia
17:00	30/01/23	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.

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
Anae Ressos	Veolia Representative	0409 638 436	anae.ressos@veolia.com
Kirsty Douglas	Epic, Project Manager and Lead Auditor	0410 410 373	kdouglas@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 2022 Clyde Waste Transfer Terminal Independent Environmental Audit. All interpretations, findings or recommendations outlined in this report should be read and relied upon only in the context of the report as a whole.

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- 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.

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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.



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Project name: 2022 Independent Environmental Audit - Clyde Waste Transfer Terminal

APPENDIX D INDEPENDANT ENVIRONMENTAL AUDIT TABLE



CONFIDENTIAL

**Veolia Australia & New Zealand
Clyde Transfer Terminal –
2022 Independent Environmental Audit – Audit Table**

IEA Date: 13-Dec-22

Auditor: Kirsty Douglas

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

9/03/2023

Date

(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.

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Verification of 2021 IEA Findings**

Recommendation Identification	Document/Condition Reference	2021 Non-Compliance	2021 Recommendation	Finding	Verification of Status	2022 Status
CTT-DA-NC-01	50	<p>The TMP was reviewed during the IEA and addressed the condition, with the exception of:</p> <p>(b) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the "left turn only" restriction upon entering or leaving the premises via Parramatta Road.</p> <p>(e) An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached.</p> <p>In terms of (b) the TMP only provides for sporadic spot checks of trucks entering or leaving the CTT. The auditor understands from the site inspection, a continuous monitoring for non-complying trucks would be impossible for Veolia, as the weighbridge does not have a proper line of site to the intersection with Parramatta Road and the 'legal' right turn from Parramatta Road is utilised by trucks that are associated with the neighbouring industrial tenancies. Furthermore, it is understood that Rawsons Road is being closed by the owner and this will increase the number of trucks going into the CTT access road from Parramatta Road.</p> <p>In terms of (e) the auditor understands punitive measures would be difficult for a commercial business to enforce. Veolia stated they prefer to re-train offending parties. Therefore it is recommended a modification to the consent to remove the requirement to enforce punitive damages.</p>	<p>Prepare and lodge a modification to the development consent that removes the requirement for Veolia to enforce punitive measures to non-conforming customers. As part of the modification Veolia should propose a revised condition that requires Veolia to provide further training with offending drivers.</p> <p>In addition a modification should propose an alternative to recording any non-complying vehicle as it is unreasonable for Veolia to provide constant monitoring of the intersection. The alternative should require Veolia to propose a sample event monitoring program at regular occurrences (e.g. attended monitoring for four continuous hours, once every three months) to record the number of trucks complying with the "left hand turn" requirements. For non-complying trucks Veolia should be providing additional training to those trucking companies.</p>	NC	<p>Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 50 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.</p>	Open, evidence of substantial progress was observed
CTT-DA-OFI-01	54	<p>The condition requires the NMP to be developed in consultation with the rail operator and the Council. The 2010 NMP was reviewed and provided to the Council and rail operator in 2010.</p> <p>No evidence of the draft NMP being provided to Pacific National or Cumberland Council was observed during the IEA. The NMP was reviewed as part of the IEA and addressed the requirements of the condition.</p>	<p>Provide a copy of the Noise Management Plan to Pacific National and Cumberland Council for review and comment.</p>	C	<p>Site personnel confirmed that the NMP was submitted to stakeholders for feedback, however Veolia have not received any comments to date.</p>	Addressed and no further action required
CTT-DA-OFI-02	63	<p>All the waste is brought under a contract. The weighbridge checks the waste type from the contractor. At the tipping floor, terminal personnel check waste is conformant.</p> <p>The site inspection demonstrated there were sufficient facilities available at the site to remove and dispose of non-conforming waste.</p> <p>It is noted the condition references guidelines that are redundant (i.e. Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (EPA, 1999)). This is because Schedule 1 of the Protection of the Environment Operations Act 1997 has pre-classified general solid waste.</p>	<p>Prepare and lodge a modification to the development consent that adjusts the condition to contemporary guideline references.</p>	C	<p>Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 63 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.</p>	Open, evidence of substantial progress was observed
CTT-DA-OFI-03	87	<p>AEMR for the IEA period was reviewed and demonstrated monitoring was undertaken in accordance with the EPL. It should be noted the EPL does not specify monitoring of the forced ventilation system.</p> <p>Maintenance records (prepared by Independent Air Flow Services in December 2021) were observed for the ventilation system.</p>	<p>Prepare and lodge a modification to the development consent that removes the requirement for monitoring of the forced ventilation system in accordance with the EPL. As EPL 11763 does not require monitoring of the forced ventilation system, condition 87 should be updated to remove any ambiguity.</p>	C	<p>Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 87 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.</p>	Open, evidence of substantial progress was observed
CTT-DA-OFI-04	113	<p>The auditor observed during the IEA, that Veolia had rolled out a trial online driver induction program with certain customers. This online program was intended to be rolled out to all customers later in the year. The online induction program provides the ability for Veolia to have up to date training records from its customers.</p> <p>At the time of IEA, the auditor observed records of drivers having completed training being maintained by Veolia.</p>	<p>Implement the online driver induction process across the CTT customer base.</p>	C	<p>The online driver induction has been implemented and was sighted during the audit interviews</p>	Addressed and no further action required
CTT-DA-NC-03	114	<p>The condition requires Veolia to implement an induction program with Pacific National (rail operator) for all train drivers and other rail staff. This program should emphasise noise mitigation measures through "Good Neighbour" rail techniques and shall form an integral part of the operational noise management plan.</p> <p>During the IEA no training program developed with Pacific National was observed. The NMP did not include specifications for such a training program. It is understood Pacific National has internal training processes for "Good Neighbour" rail techniques that may be sufficient to address this condition, however it was beyond the scope of this IEA to verify this.</p> <p>During the IEA, the auditor observed record of an email from Veolia to Pacific National requesting training evidence being supplied. To date no response has been received by Veolia. At the time of the IEA the auditor observed a Safety Interface Agreement between Veolia and Pacific National. The Safety Interface Agreement outlines relevant safety aspects and each party's responsibilities in relation to training. The safety interface agreement reviewed during the IEA did not include specific requirements around training processes for a "Good Neighbour" or noise mitigation.</p>	<p>Prepare and lodge a modification to the development consent that replaces the requirement for Veolia to undertake training with rail operators and change this to a requirement for Veolia to verify the existing training programs provided by the rail operators are suitable to minimise the risk of nuisance being caused to neighbouring properties.</p> <p>Discuss and verify the training provided by Pacific National to its drivers to ensure sufficient to meet the requirements of the condition.</p>	NC	<p>Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 114 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.</p>	Open, evidence of substantial progress was observed
CTT-DA-OFI-05	136	<p>The condition requires Veolia to establish and maintain a trust fund to facilitate the functioning of the Community Consultative Committee. During the IEA it was determined Veolia had not established such a fund. Whilst it is understood a community consultative committee has not been able to be established, the requirement for payment to a trust fund as required by this condition has not been removed. Therefore Veolia has not demonstrated reasonable compliance with this condition.</p> <p>The auditor was supplied meeting minutes from a meeting with the DPIE in August 2021. From the meeting it was concluded the DPIE would consider an amendment to this condition which would remove the requirement for a trust fund (whilst a CCC is not in place). If community interest is regained and a CCC is restarted then the trust fund would be required.</p>	<p>Prepare and lodge a modification to the development consent that removes the requirement for Veolia to establish and maintain a trust fund for a Community Consultative Committee.</p>	C	<p>Veolia submitted a request to the Planning Secretary (DPE), dated 14/3/2022, for modification to consent conditions, requesting that condition 114 be amended. DPE have indicated that Veolia will be required to submit an EIS to support the application. Therefore, this recommendation is yet to be closed out.</p>	Open, evidence of substantial progress was observed
CTT-EPL-OFI-01	M4.1	<p>The condition requires Veolia to maintain an active telephone complaints line for receiving complaints. During the IEA, the community complaints line (02 9841 2600) was rung and confirmed to be active.</p>	<p>Prepare a specific work instruction for the community complaints line and train all staff on the process for the receipt and recording of community complaints.</p>	C	<p>A dedicated hotline number is available on the Veolia CTT website. All complaints are managed by the weighbridge operators who are trained in complaints handling</p>	Addressed and no further action required
CTT-MP-OFI-01	OEMP s4.2.2.1	<p>During the IEA it was noted:</p> <ul style="list-style-type: none"> - Veolia had not formally communicated the OEMP and subplans to personnel. It was noted this will be done once approved - The OEMP is available on the BMS. - Objectives and targets are on the BMS. Monthly reporting against the objectives and targets is being undertaken. - Responsibilities are communicated through toolboxes and work instruction training - The risk assessment is currently being updated - Drills are undertaken to train in emergency response - Legal communications are delivered via toolbox <p>The OEMP section states that all staff will be reassessed twice on site-specific training within the first year to maintain the required level of training. During the IEA, the auditor was advised no reassessment of site-specific training was undertaken with staff in the first year. Furthermore, no process/system was identified that would allow Veolia to document reassessment of personnel twice in the first year.</p>	<p>Update the OEMP to have a 2-yearly re-training program for any site-specific environmental training. Remove the requirement to have site-specific training reassessed twice in the first year.</p>	C	<p>A review of section 4.2.2.1 of the OEMP confirmed that reference to retraining requirements had been included and the requirement for reassessment of site-specific training in the first year had been removed as recommended</p>	Addressed and no further action required
CTT-MP-OFI-02	WMP s4.3	<p>Compaction is undertaken continuously to minimise the time that waste material is sitting on the floor. The Facility Manager stated it is not really practical within a putrescible waste stream to identify waste material that is odorous or dusty and prioritise such waste for compaction.</p>	<p>Remove the commitment to identify waste material that is odorous or dusty and prioritise such waste for compaction.</p>	C	<p>A review of section 4.3 of the WMP (Rev 0.5 – draft) confirmed that the commitment to identifying odorous or dusty waste material had been removed as recommended.</p>	Addressed and no further action required

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Verification of 2021 IEA Findings**

Recommendation Identification	Document/Condition Reference	2021 Non-Compliance	2021 Recommendation	Finding	Verification of Status	2022 Status
CTT-MP-OFI-03	WMP s4.4.1	Measures described in this section of WMP were observed during the site inspection. During the IEA no printed material for provision to drivers was observed at the weighbridge.	Remove the commitment for the weighbridge attendant to have printed material available for provision to drivers.	C	A review of section 4.4.1 of the WMP (Rev 0.5 – draft) confirmed that reference to printed material available for provision to drivers had been removed as recommended.	Addressed and no further action required
CTT-MP-OFI-04	WMP s4.4.1.1	This section of the WMP requires site personnel to provide first, second and third breach notices to drivers found to be breaching waste acceptance requirements. During the IEA no non-compliant was observed to verify the effectiveness of the measures. Notwithstanding the above no mechanism to track the warning process allocated to specific drivers was identified. The Facility Manager advised during the IEA, offence notifications are undertaken through the Veolia sales/customer team and generally with the breaching company not the specific driver.	Update the section of the WMP to reflect the actual process for measures taken in the event of breaches of waste acceptance criteria, including notifying offending companies.	C	A review of section 4.4.1.1 of the WMP (Rev 0.5 – draft) confirmed that the process for measures taken in the event of breaches in waste acceptance criteria had been included as recommended.	Addressed and no further action required
CTT-MP-OFI-05	NMP s4.2.3	Non-conformance with this requirement is unable to be confirmed as maintenance of the tracks is beyond the operational control of Veolia.	Remove the requirement for Veolia to have any responsibility for assets that are under the operational control of other organisations.	C	A review of section 4.2.3 of the NMP (Rev 0.5 - draft) confirmed that this section has been removed as recommended.	Addressed and no further action required
CTT-MP-OFI-06	EMP s2	Evidence of the monitoring reports listed in the EMP were observed during the IEA. It is noted one monitoring type that is undertaken and not listed in the EMP is the surface water monitoring program.	Update the EMP to include the surface water monitoring program implemented at the CTT.	C	A review of the EMP confirmed that details for stormwater (surface water) monitoring had been included as recommended.	Addressed and no further action required

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
General Conditions					
1	<p>Development shall be carried out in accordance with:</p> <p>(a) DA No. 205-08-01;</p> <p>(b) the EIS prepared for the "Clyde Transfer Terminal" by Maunsell McIntyre Pty Ltd, dated 14 August 2001;</p> <p>(c) the Supplementary EIS prepared for the "Clyde Transfer Terminal" by Maunsell McIntyre Pty Ltd, dated 18 December 2001;</p> <p>(d) all additional information supplied by the Applicant or the Applicant's consultants or subconsultants to the Department or integrated approval bodies pertaining to the development, including:</p> <ul style="list-style-type: none"> -Noise Mitigation Details provided to the EPA by Vipac Engineers & Scientists Ltd by facsimile dated 15 February 2002; -Stormwater Outlet Design, dated 18 February 2002, provided to the Department by Maunsell Australia Pty Ltd; -Information on traffic, odour and noise, dated 9 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd; -Information on the construction EMP, stormwater drainage, site contamination, landscaping and rehabilitation of Duck River, and the property boundary, dated 10 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd; -Information on odour management, Duck River cycleway, and traffic management, dated 10 April 2002, provided to the independent assessor Mr John Court by Maunsell Australia Pty Ltd; -Information on the property boundary, dated 17 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd; -Information on modifications to pipeline, pipe outlet, scour protection works, detention basin, weighbridge and noise barrier, dated 19 April 2002, provided to Waterways Authority by Maunsell Australia Pty Ltd; -Information on a proposed community consultative committee and possible community enhancement projects, dated 4 June 2002, provided to the Department by the Applicant; -Information on Parramatta Road plans and odour control procedure, dated 12 June 2002, provided to the Department by Maunsell Australia Pty Ltd; -Information on odour management, dated 4 July 2002, provided to the Department by the Applicant <p>(e) Modification application MOD-133-11-2006, accompanied by Statement of Environmental Effects Modification to the Terminal Building Forced Ventilation Sydney Clyde Waste Transfer Station, prepared by Environ and dated October 2006, the Odour Mitigation Study Clyde Waste Transfer Terminal Addendum to Final Report, prepared by the Odour Unit and dated July 2006, and Veolia Environmental Services' letter (and attachments) to the Department of Planning dated 15 February 2007,</p> <p>(f) modification application DA-205-08-01-MOD-2 and;</p> <p>(g) modification application DA-205-08-01-MOD-3 and accompanying letter dated 14 December 2009</p> <p>(h) modification application DA-05-08-01-MOD-4 and accompanying Environmental Assessment letter prepared by Veolia Environmental Services (Australia) Pty Ltd and dated 20 January 2014.</p> <p>(i) modification application DA-05-08-01-MOD-5 and accompanying Environmental Assessment prepared by SG Haddad Advisory and CW Strategic Planning Services and dated 30 March 2017, except as modified by the following conditions</p>	C	1. The findings of this IEA	The auditor did not identify any major issues that would indicate non-compliance with this condition.	
2	<p>In the event of any inconsistency between;</p> <p>(a) the conditions of this consent and any document listed from condition 1(a) to 1(g) inclusive, the conditions of this consent shall prevail to the extent of the inconsistency; and</p> <p>(b) any document listed from condition 1(a) to 1(g) inclusive, the most recent document shall prevail to the extent of the inconsistency</p>	NT	N/A	This is a note only not auditable	
2A	<p>The Proponent shall comply with any reasonable requirements of the Planning Secretary arising from the Department's assessment of;</p> <p>(a) any reports, plans, programs, strategies or correspondence that are submitted in accordance with the conditions of this approval; and</p> <p>(b) the implementation of any actions or measures contained in these reports, plans, programs, strategies or correspondence.</p>	C	1. Operational Environmental Management Plan (MAN-14631-1) Rev 0.3, July 2021	OEMP dated 30/7/2021 includes detail for the revision number and submission to DPE. The OEMP and subplans are published on the Veolia CTT website.	
2B	The Proponent shall prepare revisions of any strategies, plans or programs required under this approval if directed to do so by the Planning Secretary. Such revisions shall be prepared to the satisfaction of, and within a timeframe approved by, the Planning Secretary	C	1. DPE letter confirming compliance dated 7/2/2022	Evidence of updated OEMP and sub-plans being provided to the DPE was observed during the IEA.	
Compliance					
3	It shall be the ultimate responsibility of the Applicant to ensure compliance with these conditions	C	The findings of this IEA	There were no major issues identified during the audit that would indicate non-compliance with this condition.	
4	The conditions do not relieve the Applicant of the obligation to obtain all other approvals and licenses from all relevant authorities required under any other Act.	NT	N/A	This is a note only not auditable	
5	The Applicant shall comply or ensure compliance with all the requirements of the Director-General in respect of the implementation of any measures arising from these Conditions.	C	1. The findings of this IEA	There were no major issues identified during the audit that would indicate non-compliance with this condition.	
6	The Applicant must bring to the attention of the Director-General any matter that may require further investigation, or the issuing of instructions from the Director-General, to enable compliance with these Conditions. The Applicant shall comply or ensure compliance with any instruction issued by the Director-General to enable compliance with these Conditions.	NT	N/A	Site personnel confirmed that this requirement was not triggered during the audit period.	
7	<p>Where the results of any monitoring demonstrate an exceedance of a limit in this consent, the Applicant shall provide, within 30 days of the monitoring, the monitoring results to the Director-General and Auburn Council stating:</p> <p>(a) The reason for the exceedance;</p> <p>(b) Action taken to ensure the limit is not exceeded in the future;</p> <p>(c) Proposed action to ensure the limit is not exceeded in the future;</p> <p>(d) Timetable for implementing the proposed action in (c); and</p> <p>(e) Results of additional monitoring which has been conducted within 7 days of the action taken in (b) and (c) above, to demonstrate compliance with the limit.</p>	C	<p>1. Annual Environmental Management Report Clyde Transfer Terminal 2021-2022 (AEMR)</p> <p>2. Odour Audit XXXIX Final Report, June 2022</p> <p>3. Truck Monitoring Report 16 (November 2021)</p> <p>4. 2022 Noise monitoring raw data</p>	<p>A review of the 2022 AEMR identified that there were no exceedances for air quality or noise monitoring during the audit period. The internal reporting system (RIVO) was reviewed and confirmed that no exceedances had been recorded for the audit period.</p> <p>It was confirmed during audit interviews that the raw data/reports are reviewed internally to confirm whether there have been any exceedances triggering the requirement for reporting. Veolia representatives demonstrated sound knowledge of reporting requirements.</p>	

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
Waste Volumes					
8	No waste shall be received at the development except waste to be transported by rail from Clyde to the Crisps Creek Intermodal Facility for disposal or treatment at Woodlawn.	C	1. Waste Records 2021 2. PWS Report 3. CTT Train data records	It was confirmed during the audit that all waste received onsite is transported to Woodlawn with the exception of: - Leachate temporarily collected by Enviro Waste Management Group Yennora NSW, EPA licence #20444 (receipts sighted during the audit interviews). Woodlawn has reached capacity and is in the process of constructing additional storage capacity. - Steel is temporarily stored in a skip bin - collected by Infrabuild Recycling (formerly Onesteel) Chipping Norton NSW, EPA Licence #872 once bin is full - Gas cylinders are temporarily stored in a clean empty ICB - collected by East Coast Re-valves once ICB is full Details for incoming and outgoing waste sighted on internal document control system.	
9	Condition was deleted - Mod 4	NT	N/A	Condition deleted (MOD4)	
10	The Proponent must ensure that no more than 600,000 tonnes per annum of waste is received at the development in any calendar year.	C	1. Annual Environmental Management Report - Clyde Transfer Terminal 2021- 2022 2. Waste records	1. Section 2.5 of the AEMR includes detail for waste volume monitoring. Table 2.8 includes a summary of tonnage per month during 2020 (438,258t) and 2021 (428,792t). The total tonnage for both years did not exceed 600,000 tonnes. Tonnage details for 2022 to date were also sighted electronically confirming compliance with the requirements of this condition.	
10A	The Proponent must ensure that no more than 500 tonnes of waste is present on the terminal floor at any one time, except under the limited circumstances detailed in the Operational Contingency Management Plan for the development, required by condition 54A and approved by the Development Secretary.	C	1. Site inspection	There is electronic signage in the terminal shed that identifies tonnage and clearance areas for each compactor. Observations during the site inspection confirmed that the quantity of waste on the terminal floor was well below 600,00 t. Site personnel interviewed stated the terminal building was cleared of waste at the end of each day. Observations during the site inspection also confirmed that the floor was being cleared throughout the day with waste being pushed into the compactors for transfer into shipping containers.	
Fit and Proper Person					
11	The applicant must, in the opinion of the EPA, be a fit and proper person to hold a licence under the Protection of the Environment Operations Act 1997, having regard to the matters in s.83 of that Act.	C	1. Environment Protection Licence (EPL)	Site personnel interviewed confirmed that no regulatory action has been taken in last 12 months.	
Obligation to Prevent and Minimise Harm to the Environment					
12	The Applicant is to take all practicable measures to prevent and minimise harm to the environment as a result of the Development.	C	1. Inspection forms completed and online system (RIVO).	Weekly and monthly site inspection forms were sighted during the audit confirming sufficient checks for actual/potential environmental harm have been implemented. Interviews with site personnel also confirmed that pro-active ad hoc site inspections are also undertaken to ensure compliance is being achieved. The number of additional inspections/audits depends on the sites risk, whether the Department has requested a site inspection, if potential issues /incidents have been identified on site etc.	
13	If at any time the Director-General is made aware of the occurrence of any impact from the project that poses serious environmental or amenity concerns, and is due to the failure of measures required by these Conditions or those measures identified in the documentation referred to in Condition 1 to ameliorate the impact, the Director-General may request the Applicant to cease the activities causing the impact.	C	1. Observed the incident management system	Site personnel navigated though the RIVO system to demonstrate how an incident is captured, managed investigated and closed out: Incidents: Action officer gets email notification with details of the incident including a due date for actioning. They continue to get reminders until closed (gets escalated to upper management if not closed out on time). Inspections: Weekly and monthly inspections are also uploaded into this system. Actions get allocated to appropriate personnel to action (report includes photos), get email reminders until closed out.	
14	The Applicant may recommence the activities that were ceased, upon written advice by the Director-General that those concerns have been satisfactorily addressed.	NT	N/A	Site personnel conformed no incidents have occurred in the audit period.	
Date of Commencement					
15	The date of commencement shall be the date that the Applicant determines to proceed with the development. The Applicant must provide the date of commencement in writing to the Director-General before commencement of the development.	NT	N/A	Condition was not triggered within the IEA period.	
Pre-Construction Compliance Report					
16	At least two weeks prior to commencement of construction (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General a report detailing the level of compliance with each Condition of this Consent that relates to pre-construction activities. The report shall include, but not necessarily be limited to: (a) the identification of each relevant Condition (b) the details of any study or report required by the relevant Conditions (c) the level of compliance with each relevant Condition (d) the reasons for any non-compliance (e) any action taken or proposed to make good any non-compliance, and (f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions	NT	N/A	Condition was not triggered within the IEA period.	

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
Pre-Operation Compliance Report					
17	At least one month prior to the receipt of containerised waste at the premises (or within such period as otherwise agreed in writing by the Director-General), the Applicant shall submit to the Director-General a report detailing the level of compliance with each Condition of this Consent that relates to pre-operation activities. The report shall include, but not necessarily be limited to: (a) identification of each relevant Condition (b) the details of any study or report required by the relevant Conditions (c) the level of compliance with each relevant Condition (d) the reasons for any non-compliance (e) any action taken or proposed to make good any non-compliance, and (f) any action taken or proposed to implement the recommendations made in any study or report required by the relevant Conditions	NT	N/A	Condition was not triggered within the IEA period.	
Dispute Resolution					
18	The Applicant shall endeavour to resolve any dispute arising out of the implementation of these Conditions.	NT	N/A	Site personnel conformed no incidents have occurred in the audit period.	
19	For any unresolved dispute arising out of the implementation of these Conditions between the Applicant and a public authority, company or person (but excluding any dispute between the Applicant and its contractors and/or subcontractors engaged in the construction or operation of the development), in the first instance either party can refer the matter to the Director-General for resolution and, if not resolved, to the Minister. The Minister's determination of the disagreement shall be final and binding on all parties.	NT	N/A	Condition was not triggered within the IEA period.	
Monitoring Records					
20	The results of any monitoring required to be conducted by the Conditions of this Consent or a licence under the Protection of the Environment Operations Act 1997, in relation to the development, must be recorded and retained as specified in this Consent.	C	1. Odour Audit XXXIX, June 2022 2. Annual Truck Noise Measurements Report 16, November 2021 3. 2022 Truck noise monitoring raw data	All monitoring records are maintained on Veolia's internal drive and reports published on the Veolia CTT website. A review of the odour audit report identified that the site was well maintained and there was no evidence to suggest that significant fugitive odour emission released from the site is occurring. The next odour audit is due December 2022. A review of the 2021 Truck Noise Measurement Report identified that all noise measurements were within the noise criteria and no trigger limits were exceeded. Site personnel confirmed that the 2022 Truck noise monitoring has been completed and the report is in the process of being completed (due January 2023). The raw data was sighted during the audit interviews and there were no exceedance identified.	
21	All records required to be kept by this Consent or an environment protection 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) provided in a legible form to the Planning Secretary or any authorised officer of the EPA as soon as practicable after request.	C	1. Veolia CTT website	Records for the following are available on the Veolia CTT website: - Odour Audits I - XXXVII (2005 - 2021), XXXIX (2022) - Truck Noise Monitoring Report 1 - 16 (2008 - 2021). The 2022 report was being developed at the time of this IEA - AEMRs 2010 - 2021 - IEA's 2005 - 2021	
22	The following records must be kept in respect of any samples required to be collected: (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.	C	1. Odour Audit XXXIX 2. Annual Truck Noise Measurements Report 16	Odour audit monitoring and truck noise measurement reports reviewed during the IEA included the required records as outlined in this condition.	
GENERAL ENVIRONMENTAL MANAGEMENT					
Site Contamination					
23	The applicant shall obtain an environmental report prepared by a site auditor accredited under the <i>Contaminated Land Management Act 1997</i> to determine the nature and extent of contamination at the site and any investigation and/or remediation necessary before the land is suitable for commercial/industrial use. Prior to construction the Applicant shall obtain written endorsement from the site auditor for the following aspects of the Site Contamination Management Plan: (a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination (b) A plan to manage dust during the construction and operational stages in a manner that protects the health of on-site and off-site personnel.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
24	Prior to completion of construction, any amelioration measures required to enable a site audit statement to be issued shall be implemented.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
Environmental Management Plan (EMP) (Construction Stage)					
25	The Applicant shall prepare an EMP (Construction Stage) which is specific to the development.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
25A	Prior to commencement of construction of the odour control system subject to MOD-133-11-2006, the Applicant shall prepare and obtain approval from the Planning Secretary for a Construction Environmental Management Plan (CEMP) specific to such works. The CEMP, to be submitted to the Planning Secretary and the EPA, shall include (but not necessarily be limited to) measures to be undertaken to minimise environmental impacts during construction with particular emphasis on measures for mitigating odour, dust, noise and traffic impacts on surrounding land uses. The CEMP shall provide details of how the environmental performance of the remediation works will be monitored, what actions will be taken to address identified adverse environmental impacts, and how the relevant requirements of conditions 26 to 38 shall be addressed. The CEMP shall reflect restrictions to construction hours as follows; Monday to Friday from 7am to 6pm, and Saturdays from 8am to 5pm, with no construction work on Sundays and Public Holidays. The CEMP shall be implemented during construction.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
26	The EMP (Construction Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	

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27	The Applicant must not commence any works until the EMP (Construction Stage) has been completed and submitted to the Director-General.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
28	The Applicant shall certify the EMP (Construction Stage) as being in accordance with the Conditions of Consent prior to submitting it to the Director-General.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
29	The EMP (Construction Stage) shall be made publicly available.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
30	The EMP (Construction Stage) shall include, but is not necessarily limited to, the following plans: (a) Soil and Water Management Plan (b) Construction Noise Management Plan (c) Dust Management Plan (d) Construction Waste Management Plan (e) Site Contamination Management Plan (f) Landscaping Plan	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
31	The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Construction Stage).	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
32	All site personnel (including contractors and subcontractors) during the construction stage must be inducted and trained to ensure compliance with the EMP (Construction Stage).	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
33	The Soil and Water Management Plan (SWMP) must describe the measures that will be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities. The SWMP must be prepared in accordance with the requirements for such plans outlined in Managing Urban Stormwater: Soils and Construction (available from the Department of Housing).	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
34	The Construction Noise Management Plan must address, but is not necessarily limited to, the following issues: (a) compliance standards (b) community consultation (c) complaints handling monitoring/system (d) site contact person to follow up complaints (e) mitigation measures, including details of any noise attenuation measures (f) the design and operation of the proposed mitigation methods demonstrating best practice (g) construction times (h) contingency measures where noise complaints are received (i) monitoring methods and programs.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
35	The Construction Noise Management Plan must address, but is not necessarily limited to, the following issues: (a) compliance standards (b) community consultation (c) complaints handling monitoring/system (d) site contact person to follow up complaints (e) mitigation measures, including details of any noise attenuation measures (f) the design and operation of the proposed mitigation methods demonstrating best practice (g) construction times (h) contingency measures where noise complaints are received (i) monitoring methods and programs.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
36	The Construction Waste Management Plan must include, but not necessarily be limited to, strategies to ensure any waste generated during the construction stage is recycled, reused or disposed of in a lawful manner.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
37	The Site Contamination Management Plan must include, but not necessarily be limited to, the following issues that apply to construction stage activities: (a) A plan to manage the disturbance of contaminated soil in a manner that protects sub-surface waters from contamination (b) A plan to manage dust in a manner that protects the health of on-site and off-site personnel.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
38	The Landscaping Plan must include, but not necessarily be limited to: (a) the recommendations of the Visual Assessment Study in the EIS for landscaping and planting of native species, and (b) commitments by the Applicant for an appropriate financial or in-kind contribution towards landscaping the Parramatta Road frontage to soften and screen the access point as viewed from Parramatta Road.	NT	N/A	This condition relates to the construction phase of the site. The site is now operational - condition not triggered within the audit period.	
Environmental Management Plan (EMP) (Operation Stage)					
39	The Applicant shall prepare an EMP (Operation Stage) which is specific to the development.	C	1. Operational Environmental Management Plan (MAN-14631-1) Rev 0.3, July 2021	The OEMP has been updated. Revision details state Rev 0.3 was issued to the DPE dated 30 July 2021.	
40	The EMP (Operation Stage) shall be prepared in accordance with the Conditions of this Consent, all relevant Acts and Regulations and accepted best practice management procedures.	C	1. Operational Environmental Management Plan (MAN-14631-1) Rev 0.3	The 2021 OEMP was reviewed as part of the IEA, the auditor did not identify any inconsistencies with this condition. Detail pertaining to relevant Acts and regulations is identified in Table 2.1 and up to date information is maintained in the Veolia NSW Compliance Register (TEM-10143).	

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41	The EMP (Operation Stage) shall include, but is not necessarily limited to, the following plans: (a) Waste Management Plan (b) Odour Management Plan (c) Dust Management Plan (d) Traffic Management Plan (e) Vermin and Pest Control Plan (f) Stormwater Management Plan (g) Site Contamination Management Plan (h) Incident Response Plan (i) Noise Management Plan (j) Operational Contingency Management Plan	C	Operational Environmental Management Plan (MAN-14631-1) Rev 0.3, July 2021	Section 1.3 of the 2021 OEMP includes reference and links to the subplans outlined in this condition.	
42	The Applicant shall address the elements outlined in Attachment 1 of this Consent when preparing the EMP (Operation Stage).	C	1. Operational Environmental Management Plan (MAN-14631-1) Rev 0.3, July 2021 2. OEMP Sub-Plans - 2021	The 2021 OEMP addresses the relevant elements in Attachment 1 of the consent.	
43	The Applicant must not accept any un-containerised waste at the premises until the EMP (Operation Stage) has been approved by the Director-General.	C	1. Site inspection	Site personnel confirmed interviewed all waste accepted on site is transported via compactor trucks or enclosed trucks. All trucks observed entering the site were containerised.	
44	The Applicant shall certify the EMP (Operation Stage) as being in accordance with the Conditions of Consent prior to seeking approval of the Director-General.	C	1. Email correspondence the updated OEMP and subplans were submitted to DPE 2. DPE letter confirming compliance dated 7/2/2022	The 2021 OEMP and sub-plans were confirmed to be in accordance with the consent. Evidence that they were accepted by DPE was received.	
45	All site personnel (including contractors and subcontractors) during the operational stage must be inducted and trained to ensure compliance with the approved EMP (Operation Stage).	C	1. Corporate Induction 2. Contractor and site visitor Induction 3. Training records	Site personnel interviewed confirmed that all contractor /subcontractors undergo a corporate and / or site induction. A copy of the contractor and site visitor induction was received. The online corporate training package (including the sustainability section) was sighted. Training attendance records for were received for: - Dust Management - Odour Management - Stormwater Management - Traffic Management - Waste Management Training records were not readily accessible during the site inspection - site personnel advised that records are currently held across four different locations as per internal policy, and due to the incorporation of a number of different methods for training, depending on the content. Site personnel confirmed that all training records are maintained in compliance with regulatory requirements and if not easily accessible on site, they can be requested. Site personnel also advised that the training matrix is currently in development, however has been slightly delayed due to the integration of the SUEZ business with Veolia mid year in 2022.	CTT-DA-OFI-01
46	The approved EMP (Operation Stage) shall be made publicly available on request to the Applicant.	C	1. Veolia CTT website	The OEMP (2021) is available on the Veolia website.	
47	The Waste Management Plan must address, but is not necessarily limited to, the following issues: (a) Procedures for inspecting and recording each load of un-containerised waste received at the terminal and for separating and disposing of any component of the waste that is not permitted to be accepted (b) Priority waste handling given to the most offensive wastes, otherwise "first in/first out" waste handling (c) Procedures for cleaning vehicles before they leave the premises in a manner that prevents the tracking of waste from the premises (d) An education program for all drivers of waste vehicles using the site, about waste types permitted to be received at the premises and the need to ensure their vehicle does not track waste from the premises (e) The inclusion of conditions in contracts with waste transporters addressing acceptable waste types and punitive measures for non-compliances (f) An enforcement program to be maintained for the duration of the development which includes the imposition of punitive measures for delivering unacceptable waste types (g) Procedures for minimising wind blown litter from leaving the premises and for regular patrols of surrounding areas to collect any litter that has been carried from the premises (h) Procedures for preventing washdown waters and any other liquid that has been in contact with waste from entering the stormwater system (i) An operational contingency plan to be implemented in the event of equipment failure, industrial action or other situation that prevents the containerisation of waste that has been in the terminal building in excess of 18 hours (j) Fire management procedures including the management of fire water in a manner that will not pollute waters.	C	1. Waste Management Plan (MAN-14632-1) 2021	The WMP was reviewed and addressed the requirements of this condition: a) Procedures addressed in section 4.2.3 and 4.2.4 b) Priority waste handling addressed in section 4.2.3 c) Procedure for vehicle cleaning addressed in section 4.5.1 d) Education program for drivers is addressed in section 4.4 e) Contractor contract conditions is addressed in section 4.4.2 f) Enforcement program is addressed in section 4.4.1.1 g) Process for minimising litter is addressed in section 4.5.2 h) Process for protecting surface waters is addressed in section 4.5.3 i) Operation contingency plan addressed in section 4.5.5 j) Fire management is addressed in section 4.5.4	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
48	The Odour Management Plan must address, but is not necessarily limited to, the following issues: (a) Procedures for the management of waste at the premises at all times to minimise the generation of odours. (b) Protocols for the operation of the odour control mechanisms for the terminal building, including the forced air extraction and odour filtration system, to minimise the risk of any adverse impact on surrounding commercial and residential areas. (c) Procedures for the maintenance and repair of the forced air extraction and odour filtration system on the terminal building, including the replacement of the dust filters and odour adsorption material (d) Criteria to be utilised to determine when the replacement of dust filters and odour adsorption material for the terminal building is to be carried out. (e) An emission monitoring program designed to determine the odour generation rates from the waste in the terminal building and to establish the capture and removal efficiency of the forced air extraction and odour filtration system and appropriate equipment maintenance schedules for replacement of dust filters and odour adsorption material. The program is to include odour emission monitoring using dynamic olfactometry in such a way as to allow determination of the performance of the odour control system with and without each component of the forced air extraction and odour filtration system in operation. (f) An odour audit program which provides for a comprehensive odour audit of the premises and nearby commercial and residential areas, by an independent, appropriately qualified and experienced person, to be conducted 3-monthly for the initial 24 months of receiving un-containerised waste at the terminal, and 6-monthly thereafter, unless otherwise approved in writing by the Director-General. (g) An operational contingency plan to be initiated in the event of equipment failure, industrial action or any other situation that prevents the containerisation of any waste that has been in the terminal building in excess of 18 hours. Such a plan shall include suspending the acceptance of further un-containerised waste at the premises. (h) A testing program designed to determine appropriate maintenance schedules for replacement of odour adsorption material in the pressure relief vents of the waste containers. (i) Procedures for the maintenance and repair of the odour adsorption and pressure relief vents of the waste containers, including the replacement of the odour adsorption material; and (j) A community consultation program on odour. The community consultation program may include a community survey, to be developed in conjunction with the community consultative committee.	C	1. Air Quality Management Plan (MAN-14633-1) - 2021	A review of the AQMP confirmed it addresses the requirements of this condition: a) Management to minimise odour is addressed in section 4.1.4 b) Protocols for operating air extraction and odour filtration system is addressed in section 4. c) Procedure for maintenance and repair of air extraction and odour filtration system is addressed in section 4.1.4.3 d) Criteria for the replacement of dust filters and odour adsorption material is addressed in section 4.1.2 e) Emission monitoring addressed in section 5.1.1 f) Odour audit program is addressed in section 3.2 g) Operational contingency Plan is addressed in section 4.1.3 h) Testing program is addressed in section 4.1.2 i) Maintenance and repair procedures is addressed in section 4.1.2 j) Community consultation is addressed in section 5.2.3	
49	The Dust Management Plan shall include but not necessarily limited to, control strategies to achieve compliance with any dust emission limits in this consent and any applicable environment protection license. The Dust Management Plan shall adopt the recommendations made by Turnkey Environmental Services Pty Ltd (dated 13 Feb 2006) and provided in Appendix D of the Statement of Environmental Effects Modification to the Termination Building Forced Ventilation System Clyde Waste Transfer Station (Environ, Oct 2006) in relation to the dust suppression spray system at the terminal. The Dust Management Plan shall provide for the monitoring of the performance of the dust suppression system and for improving its performance as it may be necessary. Following the receipt of any dust related complaints, the Planning Secretary may require the Applicant to undertake further investigations, monitoring or implement measures aimed to mitigate identified dust impacts on residential areas associated with the operation of the terminal	C	1. Air Quality Management Plan (MAN-14633-1) - 2021	A review of the AQMP confirmed it addresses the requirements of this condition.	
50	The Traffic Management Plan must address, but is not necessarily limited to, the following issues: (a) An education program for all drivers and owners of waste vehicles using the site, about the "left turn only" restrictions on entering and leaving the premises via Parramatta Road (b) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the "left turn only" restriction upon entering or leaving the premises via Parramatta Road. (c) An education program for all drivers and owners of waste vehicles using the site, about the waste transport routes permitted to be used in the vicinity of the development (d) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the permitted transport routes (e) An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached (f) Contracts with waste transporters to include conditions addressing entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances. (g) Measures to minimise trucks and other heavy vehicles from entering or exiting the premises between the following hours: 10pm and 5am Mondays to Saturdays; 10pm and 7am Sundays and public holidays.	NC	1. Request for modification to consent conditions (14/3/2022) 2. Traffic Management Plan (MAN-14634-1) 2021	This condition was identified as a NC in the 2021 IEA with an action to request that this condition be amended. Veolia submitted a request for modification to consent conditions (14/3/2022) requesting that the condition be changed. The request included the following: - Condition number and detail - Details of the requested change - justification for the requested change DPE have indicated that Veolia will be required to submit an EIS to support the application. Site personnel advised that as part of this open modification request, a consultant has been engaged to undertake the EIS in order to fulfil the requirements of this consent modification application. The EIS will be submitted to the DPE upon completion. NC to remain open whilst modification application is being assessed by DPE. Status to be confirmed during the 2023 IEA.	CTT-DA-NC-01
51	The Vermin and Pest Control Plan must address, but is not necessarily limited to, the following issues: (a) Removing all waste from the tipping areas at the end of each day (b) Cleaning up all waste tipping and handling areas at the end of each day (c) Regular cleaning of catch drains and drainage sumps (d) Minimising onsite waste storage and handling (e) Maintaining any bird deterrent measures such as hanging wires (f) Routine inspection and action for potential vector habitats (g) Using commercial vector control specialists (h) Conducting routine litter patrols to collect trash on site, around the perimeter, on immediately adjacent properties and on approach roads.	C	1. Vermin and Pest Control Plan (MAN-14635-1) - 2021	A review of the VPCP confirmed it adequately addresses the requirements of this condition. Section 4.1.2 outlines the schedule and method of control on site. a) Waste removal requirements are outlined in sections 4.1.2, 4.1.3 and reference to section 4.3 of the Waste Management Plan b) Cleaning up of waste addressed in sections 4.1.3 and reference to section 4.3 of the Waste Management Plan c) Regular cleaning of catch drains addressed in section 4.1.3 d) Onsite waste storage and handling addressed in section 4.1.2 and 4.1.3 e) Bird deterrents addressed in sections 4.1.2 and 4.1.3 f) Routine inspections addressed in section 5.1 g) Vector control specialists addressed in section 5 h) Routine litter patrols addressed in section 4.1.3	
52	The Stormwater Management Plan must describe the post construction measures to be employed to operate and maintain the stormwater controls at the premises in a manner that minimises the pollution of waters.	C	1. Stormwater Management Plan (MAN-14636-1) 2021	A review of the SMP confirmed it adequately addresses the requirements of this condition.	
53	The Site Contamination Management Plan must include any actions recommended in the environmental report by the site auditor that apply to operation stage activities.	C	1. Site Contamination Management Plan (MAN-14637-1) 2021	A review of the SCMP confirmed it adequately addresses the requirements of this condition. Section 5 outlines the requirements for monitoring and reporting.	

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54	The Noise Management Plan shall be drafted in consultation with the rail operator for operation of the rail siding adjacent to the waste packaging terminal for the rail haulage services for Collex. The plan is to be submitted to Auburn Council. The plan must address the objective of mitigating operational rail noise from operations directly attributable to the loading and unloading of containers and associated rail operation on the siding adjacent to the Collex terminal, relating to the movement of containers from the Collex packing terminal. The plan must also identify reasonable noise mitigation strategies: a) Upgrade to hardstand areas utilised for loading and unloading of trains and rail track upgrade where feasible; b) Resurfacing of hardstand area with appropriate noise mitigation materials; c) Track repair and realignment where feasible and appropriate to minimise forklift travel having regard for other rail operations and heritage issues; d) Container management protocols to minimise movement and handling of containers with an emphasis on noise mitigation; e) Identification and utilisation of forklifts to minimise noise impacts and implement measures to minimise use of reversing alarms at night; f) Establishment of a noise complaints procedure; g) Investigating the scheduling of trains outside critical hours subject to metropolitan curfew, Rail Infrastructure Corporation slot management and rail operational considerations; h) Ongoing community consultation; and i) Employee education in noise mitigation practices.	C	Noise Management Plan (MAN-14638-1) - 2021	A review of the NMP confirmed it adequately addresses the requirements of this condition: a) upgrade of hardstand areas is addressed in section 4.2.1 b) Resurfacing of hardstand areas is addressed in section 4.2.1 c) Track repair addressed in section 4.2.2 d) Container management is addressed in section 4.1.2 e) Noise minimisation for Forklift usage is addressed in section 4.1.2 f) Noise complaints procedure is addressed in section 5.3 and also references section 4.3.4 of the OEMP g) Train scheduling is addressed in section 4.1.4 h) Community consultation is addressed in section 1.4 i) Employee education is addressed in section 4.1.1 This conditions was identified as an OFI in the 2021 IEA with an action to provide a copy of the Noise Management Plan to Pacific National and Cumberland Council for review and comment. Site personnel confirmed that the NMP was submitted to stakeholders for feedback, however they have not received any comments to date.	
54A	Prior to the commencement of expanded operations under DA No. 205-08-01 MOD 5, the Proponent must prepare an Operational Contingency Management Plan (OCMP) to the satisfaction of the Planning Secretary. The OCMP must form part of the EMP (Operation) required by condition 41. The OCMP must: (a) be prepared by a suitably qualified and experience person(s); (b) be prepared in consultation with the EPA; (c) detail the exception circumstances when the amount of waste in the terminal building would exceed 500 tonnes at any one time (d) describe the measures in place to minimise the number of instances of these exceedances; (e) identify all potential impacts arising from these instances; (f) characterise these impacts, such as effects, duration, receptors, level of impact; (g) detail appropriate mitigation measures; (h) describe the monitoring of potential environmental impacts during exceptional circumstances; and (i) describe reporting to the appropriate regulatory authorities	C	1. Waste Management Plan (MAN-14632-1) 2021 2. Business Continuity Plan (BCP) (MAN-5523-2) 17/05/2022	The Waste Management Plan includes: - Section 4.5 of the Waste Management Plan (WMP) states that the operational Contingency Plan (Table 4.1) will be implemented in the event waste containerisation is prevented in excess of 18 hours as well as identifying issues relating to the delivery of waste - Section 4.5.5 includes reference to the requirements of this condition - Table 4.1 identifies the remedial measures to be implemented in the event of operational disruption The Business Continuity Plan includes:	
54B	The Proponent must (a) not commence expanded operations until the OCMP required by condition 54A is approved by the Planning Secretary; and (b) implement the most recent version of the OCMP approved by the Planning Secretary for the duration of the development.	C	Business Continuity Plan (BCP) (MAN-5523-2) 17/05/2022	The requirements of this condition are being complied with.	
Environmental Management Representative (EMR)					
55	The Applicant shall employ or contract a suitably qualified Environmental Management Representative (EMR) throughout the duration of the development. The EMR shall: (a) be the principle person responsible for overseeing environmental management of the development and supervision of environmental services (b) have the authority to stop work if an adverse impact on the environment has occurred or is likely to occur (c) be responsible for the certification of all environmental management plans and procedures (d) be responsible for considering and advising on matters specified in the Conditions of Consent and compliance with such matters (e) oversee the receipt of, and response to, complaints about the environmental performance of the development (f) be present on-site during any critical construction or operational activity as defined in the relevant Environmental Management Plan (g) be a member of the Community Consultative Committee for the development	C	1. DPE approval of EMR dated 15/10/2021	DPE approval in 2021 received confirming the nominated EMR. It was confirmed during the audit interviews that the EMR responsibilities align with the requirements of this condition and that they have not changed since the previous audit in which the EMR position description was received and confirmed as compliant.	
Environmental Monitoring Program					
56	The Applicant shall prepare and implement a detailed Environmental Monitoring Program for the proposed development. The program shall include, but is not necessarily limited to, all the monitoring required by this Consent, the environment protection licence, the EMP (Construction Stage) and the EMP (Operation Stage) for the development. The program must: (a) Identify the environmental issues to be monitored (b) For each issue, indicate whether its monitoring is required by this Consent, the environment protection licence, the EMP (Construction Stage), the EMP (Operation Stage), or by another instrument (c) Set standards and performance measures for each issue (d) Describe in detail how each issue is to be monitored, who will conduct the monitoring, how often the monitoring will be conducted, and how the results of the monitoring will be recorded and reported to the Director-General and other relevant authorities (e) Indicate the actions taken and procedures to be followed if any non-compliance is detected.	C	1. Environmental Monitoring Program (EMP) - 2021 2. WIS-8466-CTT - Exceedances Notification Work Instruction	A review of the EMP confirmed it adequately addresses the requirements of this condition. The table in section 2 lists: a) Environmental issues to be monitored and monitoring requirements for each environmental issue b) Includes detail of condition that issue relates to c) Standards / performance measures to be used for sampling/monitoring d) Frequency for monitoring each environmental issue, the parameters to be monitored (reference to the appropriate guideline). The EMP does not include detail on how the results will be recorded and reported to the Director General /other relevant authorities, however section 1.3 references the OEMP for this detail. Section 2.1 also includes a monitoring calendar e) Section 1.3 includes a statement that the OEMP provides detail for recording and reporting of monitoring results and actions required for any non conformances	CTT-DA-OFI-02
57	All monitoring required by this Consent must be: (a) conducted by suitably qualified persons approved by the Director-General (b) conducted in accordance with established standards and protocols (c) reported annually in the Annual Environmental Management Report.	C	1. Odour Audit XXXIX (June 2022) 2. AEMR (2021 - 2022) 3. Annual Truck Noise Measurements (November 2021) - Clyde Truck Noise Report 16	Site personnel interviewed confirmed that a) All monitoring is undertaken internally or by contractors that are suitably qualified: - Odour monitoring and reporting is undertaken by The Odour Unit - Truck noise monitoring and reporting is undertaken by Environmental Officer - NSW Resource Recovery - Water quality sampling is undertaken internally and samples are sent to a NATA accredited lab (ALS) b) Relevant standards are referenced in the report c) A review of the AEMR confirmed that the monitoring results are included	

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58	The Applicant shall include a report on the Environmental Monitoring Program in the Annual Environmental Management Report. The report must: (a) summarise the results from the Environmental Monitoring Program over the previous year (b) analyse the results in relation to both past performance, and the relevant standards and performance measures of the development (c) identify any emerging trends in the data over the life of the development (d) include a copy of the detailed monitoring results as an attachment.	C	1. AEMR (2021 - 2022)	A review of the AEMR confirmed it adequately addresses the requirements of this condition: a) A summary of the previous years results are included in the report (section 2) b) Table included in Appendix B conditions of Development Consent Compliance Table c) Monitoring results are included in Section 2 d) Monitoring data is included in Appendix D	
Annual Environmental Management Report					
59	Between twelve and fourteen months after the issue date of an environment protection licence for the development, and annually thereafter for the duration of the development, the Applicant shall submit an Annual Environmental Management Report to the Director-General, the EPA and the Community Consultative Committee. The report shall be made available to the public on request to the Applicant. The report may be combined with the Annual Return required by the environment protection licence to be submitted to the EPA. The report must: (a) identify all the standards, performance measures, and statutory requirements the development is required to comply with (b) review the environmental performance of the development to determine whether it is complying with the standards, performance measures, and statutory requirements (c) identify each occasion during the previous year when the standards, performance measures, or statutory requirements have not been complied with (d) where any non-compliance is identified, describe the actions or measures taken to ensure compliance, who is responsible for carrying out the actions, and when the actions were (or will be) implemented (e) include a summary of any complaints made about the development, and indicate the actions taken to address the complaints (f) include a report on the Environmental Monitoring Program as specified in this Consent.	C	1. AEMR (2020 - 2021) 2. Annual Return (2021 - 2022) 3. eConnect email confirming AR submitted (14/03/2022)	A review of the AEMR confirmed it adequately addresses the requirements of this condition: a) Requirements are identified in: - Table 2.2 Meteorological data parameters and performance measures - Table 2.3 NSW EPA air quality and dust assessment criteria - Table 2.4 odour emission performance criteria - Table 2.6 Noise monitoring requirements - Table 2.9 Pest and vermin management b) Environmental performance is outlined in section 3: c) Compliance for each monitoring type is outlined in the relevant subsections of section 2 and section 3 d) Table 3.1 lists any non-compliances, corrective actions, status and date completed and responsible person(s) e) Section 3.5 outlines the detail to be recorded for complaints. It also includes a statement that no complaints were received during the reporting period f) Section 2 outlines the monitoring requirements and Table 2.1 summarises the environmental monitoring program for the site	
Independent Environmental Audits					
60	Every year following the date of this consent, or at periods otherwise agreed to by the Director-General, and until such time as agreed to by the Director-General, the Applicant shall arrange for an independent audit of the environmental performance of the development. The audits shall: (a) be conducted pursuant to ISO 14010 – Guidelines and General Principles for Environmental Auditing, ISO 14011 – Procedures for Environmental Monitoring and any specifications of the Director-General; (b) be conducted by a suitably qualified independent person approved by the Director-General; (c) assess compliance with the requirements of this consent; (d) assess the implementation of the EMP (Construction) and EMP (Operation) and review the effectiveness of the environmental management of the development; and (e) be carried out at the Applicants' expense.	C	1. 2021 Independent Environmental Audit (IEA) (Epic Environmental)	A review of the 2021 IEA conducted by Epic Environmental confirmed: a) The audit was undertaken in accordance with the relevant standards and procedures b) The IEA was undertaken by suitably qualified persons. The audit team was approved by the Planning Secretary c) The consent conditions formed the compliance assessment criteria d) The OEMP and the implementation of the OEMP on site was reviewed e) Veolia engaged Epic Environmental to undertake the audit based on an agreed scope and fees.	
Monitoring and audit results to be publicly available					
61	The results of all monitoring and auditing required by this Consent must be made publicly available at the same time they are submitted to the Director-General	C	1. Veolia CTT website	Monitoring reports and audits available on the Veolia CTT website. Note: 2022 Truck noise monitoring report was being prepared at the time of this audit. Once finalised it will be submitted to the DG and published on the website. The raw data was sighted during the audit interviews.	
WASTE MANAGEMENT					
Waste Receipt and Removal					
62	The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises unless permitted to do so by an environment protection licence.	C	1. IEA of the EPL 2. Site inspection 3. Records for incoming waste	Waste accepted on the site was observed to be in accordance with this condition and the conditions of the EPL.	
63	The Applicant must ensure that waste received at the premises is restricted to inert and solid waste as defined in Schedule 1, Part 3 of the Protection of the Environment Operations Act 1997 or is assessed as inert waste or solid waste following the technical assessment procedure outlined in Technical Appendix 1 of the Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes (EPA, 1999).	C	1. Site Inspection 2. Records for incoming waste 3. Audit interviews (weighbridge supervisor) 4. Request for modification to consent conditions (14/3/2022)	All incoming waste is brought under contracts only. Upon arrival on site, the weighbridge supervisor checks the waste type from the contractor verbally and also via cameras. Terminal personnel check waste is conformant when its tipped on the terminal floor (visually). Site personnel confirmed the process for checking conformance during the site inspection. They also confirmed the process for when non-conformant waste is identified: - steel and gas bottles removed and placed in bins outside of the terminal shed for recycling - other non conformant waste is removed, contractor contacted and required to return and collect it for transfer to an appropriate facility. This conditions was identified as an OFI in the 2021 IEA with an action to request that this condition be amended. Veolia submitted a request for modification to consent conditions (14/3/2022) requesting that the condition be changed. The request included the following: - Condition number and detail - Details of the requested change - justification for the requested change	

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
64	No waste shall be removed from the premises except: (a) construction waste arising from activities during the construction stage of the development (b) waste in sealed shipping containers to be transported by rail for disposal at the Woodlawn Bioreactor (c) small quantities of waste not permitted by the EPL to be received at the terminal, that have been separated out from the incoming waste stream through a documented operational procedure of regular waste inspections and associated control measures: these wastes are to be disposed of to a lawful waste facility (d) waste generated from onsite activities such as plant maintenance and repairs, that is not suitable for acceptance at the Woodlawn Bioreactor: these wastes are to be disposed of to a lawful waste facility (e) wastewater generated onsite: these wastes are to be disposed of to sewer (f) leachate generated from the onsite management of waste: these wastes are to be disposed of to sewer or a lawful liquid waste treatment plant (g) recyclable materials generated from the onsite office: these wastes are to be directed to a suitable recycling facility.	C	1. Site Inspection 2. Records for outgoing waste	Waste removed from site complies with the requirements of this condition: a) N/A site is operational and not under construction b) Waste transferred to Woodlawn is compacted into shipping containers and placed on rail carts for transport c) Regular waste inspections are undertaken an nonconformant waste is separated d) Any onsite waste produced is disposed of appropriately e) Water on site is either collected in tanks for removal offsite or flows to the stormwater ponds f) Leachate is collected and transported offsite g) Waste material produced on site is minimal. Records for outgoing waste were sighted in the Veolia system during the audit interviews.	
65	The Applicant shall implement the approved Waste Management Plan to the satisfaction of the Director-General.	C	1. Waste Management Plan (MAN-14632-1) Revision 0.3, 30/7/2022	Observations made on site and interviews with site personnel demonstrated the WMP has been implemented on site.	
Asbestos Waste					
66	The Applicant will not accept asbestos at the premises. The Waste Management Plan must make provision for identification of asbestos in waste not knowingly received at the premises and for the proper and safe disposal of any asbestos so identified.	NC	1. Waste Management Plan (MAN-14632-1) 2. Site inspection, 3. Training records (asbestos training) 4. Audit interviews	Section 4.2.2 of the WMP includes a reference that Asbestos is an unaccepted waste, however the WMP does not specifically include detail for asbestos identification and disposal. Guides on what asbestos looks like area located on notice boards in the site office. Although staff are trained in how to identify asbestos and site personnel interviewed demonstrated an understanding of the process to follow in the event asbestos is identified, the condition is explicit that provision for the identification of asbestos <u>must</u> be detailed in the WMP.	CTT-DA-NC-02
Waste Management and Record Keeping					
67	Records shall be made and maintained of each load of waste entering the premises, including the identification of the vehicle, weight, nature and origin of the waste received, and whether the waste was received in pre-packaged shipping containers or for on-site containerisation.	C	1. Waste records for incoming waste 2. Site Inspection	Waste records for incoming waste were sighted during the site inspection, confirming compliance with the requirements of this condition. The weighbridge system was also observed during the site inspection.	
68	Records shall be made and maintained of any waste leaving the premises by motor vehicle, including the identification of the vehicle, and the weight, classification and destination of the waste.	C	1. Waste records for outgoing waste 2. Site Inspection	Records for all outgoing waste was sighted on Veolia's internal system.	
69	Records shall be made and maintained of all events involving the removal of any waste received at the premises which is not permitted to be accepted at the premises.	C	1. Waste records for outgoing waste 2. Site inspection	Waste steel and gas cylinders were observed on site - separated and stored in separate bins for recycling. These are collected once the bin is full/minimum number of cylinders.	
ODOUR MANAGEMENT					
70	The Applicant shall install a forced ventilation system in the Terminal Building in accordance with MOD-133-11-2006, the design specified in the report Addendum to Final Report – Odour Mitigation Study – Clyde Waste Transfer Terminal – Collex Pty Ltd prepared by the Odour Unit Ltd and dated July 2006, and drawing N3630/100 tilted Clyde Transfer Terminal Roof and Gallery Level Proposed Ducting Layout Details prepared by Turnkey Environmental Systems Pty Ltd. The system shall include a single air exhaust stack to discharge all air from the waste receipt and compaction/loading building, in accordance with the following specifications; Minimum Stack Height (meters above existing ground level) Minimum Stack Height above the top of the roof (meters) Minimum Stack Diameter (meters) Minimum Stack Exit Velocity (m/s) Minimum Stack Exit Volumetric Flowrate (m3/s) Location (X coordinate) Location (Y coordinate) 21 4 2.64 20 109.48 317145 6254129 The six original fans drawing air from the building through the odour control system shall be replaced with six fans of at least 18kW capacity (each) as per MOD-133-11-2006. The forced air extraction system installed under MOD-133-11-2006 shall be capable of operating in a proper and efficient manner under continuous duty Any variations of the design and specifications indicated above resulting from the detailed design of the odour control system shall be approved by the Planning Secretary, in consultation with the EPA, prior to the commencement of construction. As part of such approval, the Planning Secretary may require the Applicant to provide information demonstrating that the final design will not result in increased impacts as those predicted in the documents referred to under condition 1(e)	NT	N/A	Not applicable to this audit period. Ventilation systems were sighted during the site inspection.	
71	Construction of the Terminal Building force ventilation system in accordance with MOD-133-11-2006 shall be undertaken under continuous operation of the original forced ventilation system (as per design approved by the Planning Secretary in correspondence to Collex dated 5 January 2003). Forced ventilation in the Terminal Building, by the operation of the original system or the new system subject to MOD-133-11-2006, shall not be interrupted at any time during the period of transferring odour control systems, unless otherwise approved by the Planning Secretary following a written application for temporary stoppage of the ventilation system during that period. Such application shall provide details of stoppage time required, impacts predicted, and proposed mitigation measures and notification requirements. This condition does not apply at times when waste is not contained within the building.	NT	N/A	Not applicable to this audit period	
72	Prior to commencement of construction of the works required under MOD-133-11-2006, the Applicant shall notify the Planning Secretary, Auburn Council, the EPA and the Community Consultative Committee in writing of the date of commencement of construction, details of the main construction activities and anticipated duration of construction and times of the main construction activities.	NT	N/A	Condition relates to construction phase.	
73	The Applicant shall implement the approved Odour Management Plan to the satisfaction of the Director-General.	C	1. DPE letter confirming compliance dated 7/2/2022	DPE confirmed compliance with this condition in writing.	

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2022 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
74	The Applicant must not cause or permit the emission of offensive odours from the premises, as defined under section 129 of the Protection of the Environment Operations Act 1997.	C	1. Site inspection 2. Complaint records 3. Weekly inspection records	Site personnel interviewed that there has not been any odour complaints during the audit period. Site personnel verbally described the complaints process and navigated through the complaints system in RIVO. Weekly inspection forms were sighted and confirming the form includes a checkbox for odour. There was minimal noticeable odour outside of the terminal shed. There was no noticeable odour outside of the site boundary at the time of the site inspection.	
75	The Applicant shall continuously operate the forced ventilation system subject to MOD-133-11-2006 (and the original forced ventilation system until the system subject to MOD-133-11-2006 becomes operational) whenever waste is contained within the building, unless otherwise approved by the Planning Secretary. As part of such approval, the Planning Secretary may require the Applicant to carry out additional investigations and implement additional measures to mitigation any off-site impacts that may be anticipated or identified from such investigations	C	1. Hardcopy maintenance records for forced ventilation system	Site personnel interviewed confirmed the ventilation system is continuously operated. Maintenance records from Equilibrium Air conditioning Service Pty Ltd were sighted during the site inspection (31/10/22 and 29/9/22 November receipt yet to be received) demonstrating that the system is functioning.	
76	Within three months of the commissioning of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall conduct; (a) odour emission rate sampling and analysis from the single stack (conducted in accordance with Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (EPA, January 2007); and (b) odour dispersion modelling for the stack odour discharge conducted in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA, August 2005) and the Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW (EPA, November 2006) to confirm whether the operation of the modified stack design meets the DEC's odour goal of less than 2 OU at the nearest sensitive receiver.	NT	N/A	Condition was not triggered within the IEA period.	
77	The results of any odour performance testing and modelling conducted in accordance with the conditions of this consent, including those required under condition 77, shall be submitted to the Community Consultative Committee, the EPA, the Planning Secretary and shall be made publicly available, within eight weeks of the testing and modelling having been completed.	C	1. Veolia CTT website - Odour Audit Reports I (2005) to XXXIX (to 2022)	Odour monitoring is undertaken and reports are made available on the CTT website.	
78	Following the review of the investigations required under condition 77, or any other odour related investigations and documentation required under this consent, the Planning Secretary in consultation with the EPA may require the Applicant to carry out additional investigations and implement additional measures to mitigate any identified off-site odour impacts.	NT	N/A	Condition was not triggered within the IEA period.	
79	The results of any odour performance testing conducted in accordance with the conditions of this Consent may be submitted to the Director-General together with a proposal to vary the continuous operation of the forced air extraction and odour filtration system. The proposal must be prepared in consultation with the Community Consultative Committee and the EPA. Any variation to the continuous operation of the forced air extraction and odour filtration system must not be carried out except with the written approval of the Director-General.	NT	N/A	Condition was not triggered within the IEA period.	
80	All odour monitoring and management plans shall be made available to the public on request to the Applicant.	C	1. Veolia CTT website	The odour monitoring reports and the air quality management plan are available on the Veolia CTT website.	
81	Any containerised waste shall not be exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent.	C	1. Site inspection	All waste containers observed during the site inspection were sealed and the pressure release was observed to be directed via a filtration system.	
82	The design of the pressure release mechanism and odour filtration system on the waste containers shall be approved by the Director-General prior to the acceptance of any containerised waste at the premises.	NT	N/A	Condition relates to design phase.	
83	Any waste that has been packed into containers on the site, shall not be re-exposed to the atmosphere at the site, except via a pressure release mechanism and odour filtration system on a container maintained and operated in accordance with the Conditions of this Consent.	C	1. Site inspection	Once a container is packed, its closed and cleaned down and moved to the storage area ready for loading onto the train carts for transport to Woodlawn. Container filling and cleaning was observed during the site inspection.	
84	Deleted Condition (MOD-133-11-2006)	NT	N/A	Condition has been removed.	
85	Deleted Condition (MOD-133-11-2006)	NT	N/A	Condition has been removed.	
86	Deleted Condition (MOD-133-11-2006)	NT	N/A	Condition has been removed.	
87	The Applicant shall carry out monitoring the forced ventilation system subject to MOD-133-11-2006 (including air emissions monitoring or other) as may be required under any Environment Protection License. The monitoring results shall be reported in the Annual Environmental Management report required under condition 59.	C	1. Clyde Waste Transfer Terminal Odour Audit XXXIX (2022) 2. AEMR 2021 - 2022 3. Request for modification to consent conditions (14/3/2022)	A review of the AEMR identified that monitoring is undertaken in accordance with the requirements of this condition. Maintenance records from Equilibrium Air conditioning Service Pty Ltd for the ventilation system were also sighted during the site inspection. This conditions was identified as an OFI in the 2021 IEA with an action to request that this condition be amended. Veolia submitted a request for modification to consent conditions (14/3/2022) requesting that the condition be changed. The request included the following: - Condition number and detail - Details of the requested change - justification for the requested change	
88	Monitoring for the concentration of a pollutant emitted to the air must be done in accordance with: (a) any methodology which is required by or under the Protection of the Environment Operations Act 1997 to be used for the testing of the concentration of the pollutant; or (b) if no such requirement is imposed by or under the Protection of the Environment Operations Act 1997, any methodology which the general terms of approval or a condition of the licence (as the case may be) requires to be used for that testing; or (c) if no such requirement is imposed by or under the Protection of the Environment Operations Act 1997 or by the general terms of approval or a condition of the licence (as the case may be), any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	C	1. Clyde Waste Transfer Terminal Odour Audit XXXIX (2022) 2. AEMR 2020 - 2021	Odour monitoring is undertaken in accordance with methods consistent with the EPA requirements.	
89	Deleted Condition (MOD-133-11-2006)	NT	N/A	Condition has been removed.	

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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification																																																												
90	Prior to the installation of the forced ventilation system subject to MOD-133-11-2006, the Applicant shall provide to the EPA, manufacturer's performance guarantees, demonstrating to the satisfaction of the EPA that the equipment will comply with the design parameters specified in this consent and/or the Environmental Protection License.	NT	N/A	Condition has been removed.																																																													
91	A meteorological station must be sited and operated at the premises in accordance with the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW. The Applicant shall undertake the sampling and analysis of the meteorological parameters specified in table below. Sampling and analysis of meteorological parameters shall be carried out strictly in accordance with the methods and references specified in the table. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Parameter</th> <th>Units of measure</th> <th>Averaging Period</th> <th>Method¹</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Wind Speed @ 10 m</td> <td>m/s</td> <td>1 hour</td> <td>AM-2 & AM-4</td> <td>Continuous</td> </tr> <tr> <td>Wind Direction @ 10 m</td> <td>°</td> <td>1 hour</td> <td>AM-2 & AM-4</td> <td>Continuous</td> </tr> <tr> <td>Sigma Theta @ 10 m</td> <td>°</td> <td>1 hour</td> <td>AM-2 & AM-4</td> <td>Continuous</td> </tr> <tr> <td>Temperature @ 10 m</td> <td>K</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Temperature @ 2 m</td> <td>K</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Solar Radiation</td> <td>W/m²</td> <td>1 hour</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Rainfall</td> <td>mm</td> <td>24 hours</td> <td>AM-4</td> <td>Continuous</td> </tr> <tr> <td>Evaporation</td> <td>mm</td> <td>24 hours</td> <td>Note²</td> <td>Continuous</td> </tr> <tr> <td colspan="3">Additional Requirements</td> <td colspan="2">Method¹</td> </tr> <tr> <td colspan="3">Siting</td> <td colspan="2">AM-1 & AM-4</td> </tr> <tr> <td colspan="3">Measurement</td> <td colspan="2">AM-2 & AM-4</td> </tr> </tbody> </table> <p><small>Note: ¹ All methods are specified in the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW. Note: ² Method approved by the EPA in writing.</small></p>	Parameter	Units of measure	Averaging Period	Method ¹	Frequency	Wind Speed @ 10 m	m/s	1 hour	AM-2 & AM-4	Continuous	Wind Direction @ 10 m	°	1 hour	AM-2 & AM-4	Continuous	Sigma Theta @ 10 m	°	1 hour	AM-2 & AM-4	Continuous	Temperature @ 10 m	K	1 hour	AM-4	Continuous	Temperature @ 2 m	K	1 hour	AM-4	Continuous	Solar Radiation	W/m ²	1 hour	AM-4	Continuous	Rainfall	mm	24 hours	AM-4	Continuous	Evaporation	mm	24 hours	Note ²	Continuous	Additional Requirements			Method¹		Siting			AM-1 & AM-4		Measurement			AM-2 & AM-4		C	1. Meteorological station data 2. Clyde Waste Transfer Terminal Odour Audit XXXIX (2022) 3. AEMR 2020 - 2021 4. Site inspection	Meteorological station present on site. Data was also sighted on Veolia's internal document control system. Weather data calibration reports are also included in appendix B of the Odour report. Meteorological data is included in Appendix D1 of the AEMR.	
Parameter	Units of measure	Averaging Period	Method ¹	Frequency																																																													
Wind Speed @ 10 m	m/s	1 hour	AM-2 & AM-4	Continuous																																																													
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DUST MANAGEMENT																																																																	
92	The Applicant shall implement the Dust Management Plan (Construction Stage) and the approved Dust Management Plan (Operation Stage) to the satisfaction of the Director-General.	C	1. Air Quality Management Plan (MAN-14633-1) - 2021	Observations made on site and interviews with site personnel demonstrated the AQMP has been implemented on site.																																																													
93	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	C	1. Site inspection	Site personnel interviewed confirmed that they use a street sweeper twice a day to minimise dust. The street sweeper was no working at the time of the site inspection and has been booked in for repairs, therefore, Veolia have engaged a contractor to undertake sweeping one a day. There was no evidence of dust generation at time of audit.																																																													
94	All trafficable areas and vehicle manoeuvring areas in or on the premises shall be maintained at all times in a condition that will minimise the generation or emission from the premises, of wind-blown or traffic generated dust.	C	1. Site inspection	The site was observed to be relatively neat / clean during the site inspection (very minor amount of loose waste were observed). Site personnel confirmed that this waste gets collected during daily litter patrols. Street sweeping occurs once a day by a contractor until the Veolia street sweeper is repaired then sweeping will occur twice daily.																																																													
95	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading. (EPA)	C	1. Site inspection 2. Driver induction	All trucks observed entering and exiting the site were covered/enclosed. A hard copy of the driver induction was sighted during the site inspection which included the Do's and Don't of the site. Site personnel interviewed confirmed that this induction is now available online .																																																													
96	The Applicant must prepare and implement an Ambient Air Quality Monitoring Plan. The Plan must address, but not necessarily be limited to, the following: (a) Monitoring methodologies and standards (sampling and analysis); (b) Monitoring for concentrations of total suspended particulates (TSP) and dust deposition rates; (c) Locations where monitoring will be carried out; (d) Detailed monitoring cycle and the duration of each monitoring cycle; and (e) Reporting.	C	1. EMP - 2021 2. AQMP - 2021	The requirements of this condition are addressed in the e OEMP and AQMP.																																																													
97	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.																																																													
AIR MONITORING																																																																	
98	Detailed records of operating conditions inside the waste terminal building shall be made coincident with any monitoring for odour or dust required by Conditions of this Consent.	C	1. Odour Audit XXXVI	Records of operating conditions are outlined in section 2 of the odour report for: - transfer terminal building - container packing area and site roadways																																																													
WATER MANAGEMENT																																																																	
99	Except as may be expressly provided by a licence under the Protection of the Environment Operations Act 1997 in relation of the development, section 120 of the Protection of the Environment Operations Act 1997 must be complied with and in connection with the carrying out of the development.	C	1. Site Inspection 2. Stormwater Management Plan (MAN-14636-1) 2021	There was no release of water offsite at the time of the site inspection. Section 4 of the SMP outlines the stormwater management measures implemented on site. This appeared to be consistent with observations made during the site inspection.																																																													
100	Any water that comes into contact with waste at the premises must be directed to the leachate collection system.	C	1. Site Inspection 2. Stormwater Management Plan (MAN-14636-1) 2021	Section 4.2 of the SMP outlines the management of leachate on site. The leachate management system is independent of the stormwater system and leachate is captured in a 32 kilolitre tanks.																																																													
101	The approved Soil and Water Management Plan must be implemented prior to and for the duration of the construction stage of the development.	NT	N/A																																																														
102	Stormwater pollution controls must be implemented prior to and for the duration of the operation of the development. The controls shall be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the Scheme shall be consistent with the guidance contained in Managing Urban Stormwater: Council Handbook (available from the EPA). The controls shall incorporate minimum levels of treatment in the following table:	C	1. Site Inspection 2. Stormwater Management Plan (MAN-14636-1) 2021	The SMP details the control measures in place on site are in accordance with the requirements of this condition. Site personnel confirmed that a new automatic gate (on a float) has been installed in between the entry zone and Pond 1A - although this is currently not reflected in the 2021 SMP, Site personnel advised the SMP will be updated to include this detail.	CTT-DA-OFI-03																																																												

**Clyde Transfer Terminal
2022 Independent Environmental Audit
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Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification								
SITE CONTAMINATION													
103	The Site Contamination Management Plan must be implemented to the satisfaction of the Director-General, prior to and for the duration of the development	C	1. Site Contamination Management Plan (MAN-14637-1) 2021	Observations made on site and interviews with site personnel demonstrated the SCMP has been implemented on site.									
NOISE MANAGEMENT													
104	The Applicant shall implement the approved Construction Noise Management Plan, to the satisfaction of the Director-General.	C	1. Noise Management Plan (MAN-14638-1) 2021 2. DPE letter stating compliance 7/2/2022	NMP previously approved,.									
105	The Applicant shall implement the Noise Management Plan, to the satisfaction of the Director-General.	C	1. Noise Management Plan (MAN-14638-1) - 2021	Observations made on site and interviews with site personnel demonstrated the NMP has been implemented on site.									
106	All construction work at the premises that creates audible noise at residential premises must only be conducted between 7:00am and 5:00pm on Mondays to Fridays and between the hours of 8:00am and 5:00pm on Saturdays. There shall be no construction activities on Sundays or public holidays. The allowable construction times may be varied by an environment protection licence.	NT	N/A	Condition relates to construction phase.									
107	The delivery of construction material outside the hours of construction permitted by this Consent is not permitted except when required by police or other authorities for safety reasons; and/or because the operation, personnel or equipment are endangered. In such circumstances, notification is to be provided to the EPA and affected residents at least 24 hours prior to the delivery, or within a reasonable period in the case of an emergency.	NT	N/A										
108	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.									
109	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.									
110	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.									
111	Deleted Condition (DA-205-08-01-MOD-3)	NT	N/A	Condition has been removed.									
112	The Applicant shall implement a Heavy Vehicle Noise Monitoring Management Program for the development to the satisfaction of the Planning Secretary. This program must; (a) monitor heavy vehicle noise on site, in accordance with the methods outlined in the "Truck Noise Monitoring – Proposed Test and Management Plan" prepared by Heggies and dated 26 May 2008; (b) be undertaken quarterly for a year starting in October 2008, and annually thereafter, unless otherwise agreed by the Planning Secretary (c) measure at least 25% of the heavy vehicles visiting the site; (d) identify heavy vehicles exceeding the relevant noise criteria specified in Australian Design Rule 28/01, or its successor, and ensure that the owners of these subsequently comply with the relevant noise criteria (e) report the number of non-compliant heavy vehicles identified and the actions undertaken to address these non-compliances in the Annual Environmental Monitoring Report; and (f) be amended, should the monitoring activities not achieve the aim of the program to the satisfaction of the Planning Secretary	C	1. Environmental Monitoring Plan - 2021 2. Annual Truck Noise Measurements (Report 16)	A review of the 2022 Annual Truck Measurements (Report 16) and the EMP demonstrated compliance with the requirements of this condition: a) The introduction of the Truck noise measurements report includes a statement that monitoring has been completed in accordance with the proposed test management plan developed by Heggies b) The noise monitoring is undertaken on an annual basis (annual reports are available to eh Veolia CTT website) c) The noise measurement results section of the report outlines that a total measurement of 41.5% of all truck movements was achieved in the monitoring round d) Noise criteria is outlined in Table 1 of the report. Individual noise levels outlined in Table 2. e) No non-conformances were identified f) N/A Interviews with site personnel confirmed that most of the noisy activities occur during daytime hours: most waste is processed through the day, the afternoon shift finishes processing around 5:30pm, cleaning of compactors and then occurs and at approx. 9:30pm the train is stripped and reloaded.									
113	The Applicant shall implement an induction program for all drivers of trucks that deliver waste to the waste terminal with the objective of mitigating noise impacts of trucks entering and leaving the waste terminal, including driving procedures and throttle management. The program is to be designed in consultation with Auburn Council and is to emphasise the importance of noise emission control, driving and operating practices and procedures for night time activities.	C	1. Online induction program 2. Training records 3. Audit Interviews	A hard copy of the driver induction was sighted during the site inspection which included the Do's and Don't of the site. Site personnel interviewed confirmed that this induction is now available online. This conditions was identified as an OFI in the 2021 IEA with an action to implement the online driver induction process across the CTT customer base. Site personnel confirmed that his has been implemented and screen shots of the induction were sighted during the audit interviews.									
114	The Applicant shall, in conjunction with the rail operator, implement an induction program for all train drivers and other rail staff dedicated to transporting containers to and from the Collex terminal area by train to Woodlawn. The program is to emphasise noise mitigation measures through "Good Neighbour" rail techniques such as notch control, idling practices, shunting speeds and engine control and shall form an integral part of the operational noise management plan. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #d9ead3;">Development component</th> <th style="background-color: #d9ead3;">Minimum level of stormwater treatment</th> </tr> </thead> <tbody> <tr> <td>Undeveloped sections of access road</td> <td>Existing overland flow to Duck River</td> </tr> <tr> <td>Roof water</td> <td>On-site detention</td> </tr> <tr> <td>Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units</td> <td>First flush system, GPT, oil and grease separation, on-site detention</td> </tr> </tbody> </table>	Development component	Minimum level of stormwater treatment	Undeveloped sections of access road	Existing overland flow to Duck River	Roof water	On-site detention	Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units	First flush system, GPT, oil and grease separation, on-site detention	NC	1. Audit Interviews 2. Request for modification to consent conditions (14/3/2022)	Interviews with site personnel confirmed that this condition is not achievable as it is out of their scope /control. The trains are owned/operated by Pacific National who have their own training /induction packages. This conditions was identified as a NC in the 2021 IEA with an action to request that this condition be amended. Veolia submitted a request for modification to consent conditions (14/3/2022) requesting that the condition be changed. The request included the following: - Condition number and detail - Details of the requested change - Justification for the requested change Site personnel advised that as part of this open modification request, a consultant has been engaged to undertake the EIS in order to fulfil the requirements of this consent modification application. The EIS will be submitted to the DPE upon completion.	CTT-DA-NC-03
Development component	Minimum level of stormwater treatment												
Undeveloped sections of access road	Existing overland flow to Duck River												
Roof water	On-site detention												
Gatehouse and weighbridge area, carpark, access road and container loading area adjacent to the compaction units	First flush system, GPT, oil and grease separation, on-site detention												

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
VERMIN AND PEST MANAGEMENT					
115	The design of the terminal building and associated waste handling facilities shall incorporate such reasonable measures to eliminate or minimise the potential for birds, rodents, flies and other pests to congregate at the development. Consideration shall be given to incorporating the following measures: (a) sealing surfaces to prevent moisture and odour absorption (b) elimination of crevices where waste, moisture and vermin can accumulate (c) providing screening of the ventilation openings in the building (d) eliminating horizontal surfaces where birds can congregate (e) minimising horizontal ledges where dust and litter can accumulate (f) using fencing and netting to prevent wind-blown litter from escaping.	NT	N/A	This condition relates to design. It was noted that there were several measures in place to minimise the presence of vermin and pests.	
116	The Vermin and Pest Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Director-General.	C	1. Vermin and Pest Control Plan (MAN-14635-1) - 2021 2. Site inspection	Observations made on site and interviews with site personnel demonstrated the VPMP has been adequately implemented on site.	
117	The Applicant must take all practicable measures to prevent the attraction and infestation of the premises with vermin and pests.	C	1. Pest contractor inspection records 2. Vermin and Pest Control Plan (MAN-14635-1) - 2021	All reasonable and practical measures to prevent the attraction and infestation of vermin/pests was observed on site: - Bait stations present on site - Bird nets located on the roof of the terminal shed and the site offices - Electric Bird Deterrent System (Avishock) installed (confirmed that the solar system for this is due for a service) - Good housekeeping across the site - The time waste remains on the terminal floor is kept to a minimum - Litter patrols occur daily - Regular cleaning of the site occurs Pest contractor records were sighted during the site inspection.	
TRAFFIC MANAGEMENT					
118	All access to the development shall be via a sealed access road from Parramatta Road. No vehicle shall enter or exit the development via the internal road connecting the Clyde Marshalling Yards to Rawson Street	C	1. Site Inspection	The site access road from Parramatta Road is sealed. All vehicles entering the site were observed to be via this road during the site inspection.	
119	No vehicle is permitted to turn right into the site off Parramatta Road until the intersection upgrade works have been completed to the satisfaction of Cumberland Council and Roads and Maritime Services (RMS).	C	1. Site Inspection	No vehicles were observed to be turning right into the site from Parramatta Road at the time of the site inspection. This requirement was also reflected in the site induction and traffic management plan.	
119A	Prior to the commencement of construction of the intersection upgrade works, the design of the intersection must be prepared in consultation with and to the satisfaction of Cumberland Council and RMS. The intersection design must accommodate the largest vehicle associated with the development as follows: (a) turning right into the development from Parramatta Road (e.g. 12.5 metre rigid waste trucks); (b) turning left into the development from Parramatta Road (e.g. semi trailers); and (c) turning left out of the development onto Parramatta Road (e.g. semi trailers).	NT	N/A	Condition relates to pre-construction	
119B	All intersection works must be to the full cost of the Proponent and at no cost to RMS or Cumberland Council	NT	N/A	Condition relates to construction phase	
119C	The intersection upgrade works along Parramatta Road/private access road must be designed to meet RMS requirements, and endorsed by a suitable qualified practitioner. The design requirements must be in accordance with AUSTRROADS and other Australian Codes of Practice. The certified copies of the civil design plans must be submitted to RMS for consideration and approval prior to the release of the Construction Certificate by the Principle Certifying Authority and commencement of road works	NT	N/A	Condition relates to construction phase	
119D	The Proponent is required to enter into a Work Authorisation Deed (WAD) for the intersection works.	NT	N/A	Condition relates to construction phase	
119E	Within 6 months of commencement of right-turn movements into the site, a road safety audit (RSA) must be undertaken for the intersection of Parramatta Road and the private access road by a suitably qualified, independent professional. The results of the RSA, including a program for the implementation of any audit recommendations, must be submitted to Cumberland Council and RMS for consideration and review within 60 days of completion of the audit.	NT	N/A	Site has been operational for longer than 6 months	
120	No vehicle exiting the development shall turn right onto Parramatta Road.	C	1. Site Inspection	No vehicles were observed to be turning right onto Parramatta Road from the site at the time of the site inspection.	
121	The Traffic Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Director-General.	C	1. TMP - 2021	Observations made on site and interviews with site personnel demonstrated the TMP has been adequately implemented on site.	
122	Prior to the commencement of construction activities, the Applicant shall demonstrate to the satisfaction of the Director-General, it has reasonable arrangements in place in respect of its use of the right of carriageway, concerning traffic sharing, protection of underground and above-ground services in the vicinity of the carriageway and the potential impacts on the existing weighbridge.	NT	N/A	Condition relates to pre-construction	
123	Deleted Condition (DA-205-08-01-MOD-5)	NT	N/A	Condition removed	
124	The Applicant shall fund a traffic study, to be conducted by an independent, suitably qualified person. The study is to be completed and submitted to the Director-General within 14 months from commencement of operations, review the operation of the access road in the first 12 months of the development and recommend any future actions to ensure sufficient future capacity of the access road. The Applicant shall provide a reasonable financial contribution towards any upgrade of the access road recommended by the study.	NT	N/A	Site has been operational for longer than 14 months	

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
EMERGENCY MANAGEMENT					
Emergency Management Plan					
125	In relation to activities, which in the event of a disruption to operations may result in significant pollution being emitted, the Applicant must: (a) conduct an assessment to determine the potential internal and external causes of disruption of operations at the premises; (b) determine how these disruptions would impact on operations; and (c) identify the pollution that would result due to the disruption of operations and what impact the pollution would have on the health of the community and the environment.	C	1. Emergency Response Plan (ERP) - 18/12/2022	A review of the ERP confirmed that the requirements of this condition have been addressed.	
126	In relation to matters identified in the previous condition, the Applicant must prepare an Emergency Management Plan. The Plan shall address, but not necessarily be limited to: (a) identification of threats to the environment and/or public health that could arise in relation to the construction and operation of development. These threats may include fire, overflow, power or other utility failure, natural disaster etc; (b) identification of strategies to minimise and ameliorate the effects of any water pollution identified from the groundwater and surface water monitoring programs; (c) an estimate of the cost of implementation; (d) actions to effectively respond to the disruption of operations so the risk of pollution is minimised; (e) a communications strategy for alerting relevant agencies and the potentially affected community in the event of the disruption to operations leading to significant pollution; and (f) ensuring that all relevant employees are familiar with the emergency management plan.	C	1. ERP - 2021 2. Clyde Transfer Terminal PIRMP Test (debrief) 8/12/2022	A review of the ERP confirmed that the requirements of this condition have been addressed: a) Threats to the environment/public health are outlined in section 6 b) An inventory of potential pollutants and how they are managed to minimise impacts is outlined in Section 1.1.2 c) Cost implications are outlined in a table in section 2 d) Incident response actions are outlined in section 6 e) Emergency communications are outlined in section 7 f) All staff undergo site inductions which includes ERP. A drill to test the hot load procedures, ERP, spill response and the pollution incident response Management Plan (PIRMP) was undertaken on 8/12/2022 to confirm the adequacy of the plans and the implementation of the plans. A copy of the emergency drill debrief was sighted during the site inspection and audit interviews.	
127	The Applicant shall consult with the NSW Fire Brigades and install a fire main and hydrants as required by the Fire Brigades. The system shall comply with AS 2419.	NT	N/A	Condition has been removed.	
LANDSCAPING					
128	The Applicant shall implement the Landscaping Plan in consultation with Auburn Council and to the satisfaction of the Director-General.	NT	N/A	Landscaping works previously completed.	
DEVELOPMENT SETBACK					
129	The Applicant shall not construct any new buildings, hardstand, storage areas or vehicle manoeuvring areas within 30 metres of the Duck River Mean High Water Mark (as measured horizontally), to allow for the establishment of a viable riparian zone and multi-purpose recreation path.	NT	N/A	No new buildings have been constructed within the audit period	
RIPARIAN RESTORATION					
130	The Applicant shall prepare at its own expense a site specific Riparian Zone Management Plan to address the issues contained in Auburn's draft Duck River Riparian Management Plan. The Plan shall be submitted to Auburn Council's Director Service Planning prior to the issue of the Occupation Certificate, or as otherwise agreed to by Auburn Council. Any riparian restoration activities undertaken by the Applicant shall, where appropriate, be consistent with but not necessarily limited to the activities listed in Attachment 3.	C	1. Audit interviews	The proposed riparian / public space zone located between Duck River and the Clyde TT is owned by Council Site personnel confirmed that they have previously contacted Council to collaborate on the Duck River Riparian management, however there has been no response to date. No riparian restoration activities have been undertaken to date.	
DUCK RIVER ACCESSWAY					
131	The Applicant shall facilitate as appropriate and as required by the Director-General, the provision of a 3.0 metre wide reinforced concrete multi-purpose recreation path along the landward side of a 30 metre riparian/public open space dedication zone between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.	C	1. Audit interviews	The proposed riparian / public space zone located between Duck River and the Clyde TT is owned by Council Interviews with site personnel confirmed that they have previously contacted Council to collaborate on the Duck River Riparian management, however there has been no response to date. It was also confirmed that this footpath has not been installed.	
LAND DEDICATION					
132	The Applicant shall facilitate as appropriate and as required by the Director-General and/or contribute to the dedication to Auburn Council of land incorporating the riparian restoration zone and multi-purpose recreation path between the proposed development and Duck River, extending from Parramatta Road to the base of the Clyde railway bridge, along the edge of the development.	C	1. Audit interviews 2. Email correspondence with Council	Interviews with site personnel confirmed that they have previously contacted Council to collaborate on the Duck River Riparian management, however there has been no response to date.	
HERITAGE					
133	The Applicant shall contribute to the development and installation of heritage interpretation signage in consultation with Auburn Council, regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and associated pre-use of the area occupied by the development. The heritage signage is to be approved by Auburn Council and installed within 6 months of commencement of the approved use or as otherwise agreed to by Auburn Council.	NT	N/A	It was noted during the site inspection that there was no heritage signage present.	

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
COMMUNITY LIASON					
Community Consultative Committee					
134	The Proponent must make all reasonable attempts to establish and maintain a Community Consultative Committee generally in accordance with the Community Consultative Committee Guidelines for State Significant Projects, unless otherwise agreed to in writing by the Planning Secretary. The Proponent must submit a report to the Department every 12 months documenting its progress in establishing and maintaining the Community Consultative Committee over time.	C	1. Veolia CTT website 2. Audit Interviews 3. Community Newsletter	Interviews with site personnel identified that there was very little success/interest in the Community Consultative Committee. DPE provided a resource to assist with developing a community group, however there was little to no interest. Veolia also conducted door knocks and held a community day which had no interest from the community. Veolia sent a letter to DPE stating that his condition was not achievable. Alternative measures have been implemented which include: - Community newsletter - Dedicated website that includes details for where the community can provide feedback (phone number and email address). Site personnel advised that as part of this open modification request, a consultant has been engaged to undertake the EIS in order to fulfil the requirements of this consent modification application. The EIS will be submitted to the DPE upon completion	CTT-DA-OFI-04
135	The Applicant shall, at its own expense: (a) provide appropriate facilities for meetings of the Committee; (b) nominate a representative to attend all meetings of the Committee; (c) provide to the Committee regular information on the progress of the work and monitoring results; (d) promptly provide to the Committee such other information as the Chairperson of the Committee may reasonably request concerning the environmental performance of the development; and (e) provide reasonable access for site inspections by the Committee.	C	N/A	Refer to audit findings for condition 134. Given there is no Consultative Committee, the requirements of this condition are not considered applicable. Site personnel advised that as part of this open modification request, a consultant has been engaged to undertake the EIS in order to fulfil the requirements of this consent modification application. The EIS will be submitted to the DPE upon completion	CTT-DA-OFI-05
136	The Applicant shall establish a trust fund to be managed by the Chairperson of the Committee to facilitate functioning of the Committee, and pay \$2000 per annum to the fund for the duration of the development. The payment shall be indexed according to the Consumer Price Index (CPI) at the time of payment. The first payment shall be made by the date of the first Committee meeting. The Applicant shall also contribute reasonable funds for payment of the independent Chairperson, to the satisfaction of the Director-General.	C	1. IEA Interview 2. Meeting minutes between Veolia and DPE 3. Request for modification to consent conditions (14/3/2022)	The Community Consultative Committee was unsuccessful, therefore providing funds does not serve any purpose. Recommended that Veolia consider request this condition be removed under a modification the consent. This conditions was identified as an OFI in the 2021 IEA with an action to request that this condition be amended. Veolia submitted a request for modification to consent conditions (14/3/2022) requesting that the condition be changed. The request included the following: - Condition number and detail - Details of the requested change - justification for the requested change	
COMMUNITY ENHANCEMENT PROGRAM					
137	Prior to the commencement of construction, or as otherwise approved by the Director-General in consultation with Auburn Council, the Applicant shall take all reasonable steps to negotiate an agreed outcome with Auburn Council for an appropriate level of contribution (financial or in-kind) towards mitigating the social and community impacts resulting from the construction and operation of the development. The contribution shall provide, but not necessarily be limited to, the following: (a) the payment of \$50,000 (unless otherwise agreed to by the Director-General) to Auburn Council as a contribution to the drafting of a masterplan for the entire Clyde Marshalling Yards (b) appropriate monetary lump sum contributions to be negotiated with Auburn Council for the purposes of: '- the widening of the Western Overbridge; - establishing a vegetated riparian restoration zone along the eastern bank of Duck River from Parramatta Road to the Clyde railway bridge; - establishing a multi-purpose recreation path adjacent to the riparian zone from Parramatta Road to the Clyde railway bridge; and - the development and installation of heritage interpretation signage along the multi-purpose recreation path regarding the heritage significance of the Clyde Marshalling Yards and in particular Track 22 and associated pre-use of the area occupied by the development. (c) ongoing or as otherwise agreed to financial contributions proportional to the tonnage throughput of the terminal for the purpose of local community enhancement projects and/or activities in accordance with a community enhancement plan to be prepared by Auburn Council to reflect community priorities and needs. Should such a negotiated outcome not be reached, the Applicant shall abide by the requirements of the Director-General concerning community enhancement contribution in light of an independent investigation to establish such contribution. Such investigation is to be carried out by an independent person(s) to be appointed by the Director-General in consultation with the Applicant and Auburn Council. The commencement of any construction on-site shall not proceed unless the above outcomes have been agreed or otherwise approved by the Director-General in consultation with Auburn Council.	NT	N/A	Condition relates to pre-construction	

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Determination of a Development Application for State Significant, Development Consent (205-08-01)**

Condition Ref	Requirement (Exact Wording)	Audit Findings	Evidence Reviewed	Independent IEA Findings	Unique Identification
Elements to be addressed in the Environmental Management Plan (Construction Stage) and the Environmental Management Plan (Operation Stage)					
Attachment 1	<p>The EMP (Construction Stage) and EMP (Operation Stage) shall address but not be limited to:</p> <ol style="list-style-type: none"> 1. identification of the statutory and other obligations which the Applicant is required to fulfil during construction stage including all approvals and consultations/agreements required from authorities and other stakeholders, and key legislation and policies which control the Applicant's implementation of the development 2. periodic or otherwise revision of the EMP to address changed or evolving circumstances 3. definition of the role, responsibility, authority, accountability and reporting of all personnel relevant (including sub-contractors) to compliance with the construction EMP 4. measures to avoid the occurrence of adverse environmental impacts 5. induction and training of all personnel (including sub-contractors) to ensure compliance with the construction EMP 6. the role of the EMR 7. measures to provide positive environmental offsets to unavoidable adverse environmental impacts 8. environmental management procedures for all construction processes which are important for the quality of the environment in respect of permanent and/or temporary works 9. monitoring, inspection and test plans for all activities and environmental qualities which are important to the environmental management of the project including performance criteria, specific tests, protocols (e.g. frequency and location) and procedures to follow including procedures for notifying all relevant authorities should non-compliance with any limits or performance standards specified in the construction EMP arise 10. environmental management instructions for all complex environmental control processes which do not follow common practice or where the absence of such instructions could be potentially detrimental to the environment 11. requirements to undertake environmental audits to ensure that the construction EMP is working and steps the Applicant intends to take to ensure that all plans and procedures are being complied with 12. delegation of responsibilities for compliance with the EMP and relevant environmental statutes 13. community consultation and notification strategy (including the local community and all relevant authorities) and complaint handling procedures 14. project records to be maintained to provide objective evidence of the level of compliance with the construction EMP. 	C	<ol style="list-style-type: none"> 1. OEMP - 2021 2. OEMP Sub-Plans - 2021 	A review of the 2021 OEMP and its subplans confirmed they meet the requirements of this condition.	

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Environmental Protection License (No. 11763)**

Condition Ref	Requirement (Exact Wording)	Audit Finding	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 style="text-align: left;">Scheduled Activity</th> <th style="text-align: left;">Fee Based Activity</th> <th style="text-align: left;">Scale</th> </tr> </thead> <tbody> <tr> <td>Waste processing (non-thermal treatment)</td> <td>Non-thermal treatment of general waste</td> <td>Any annual processing capacity</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 general waste	Any annual processing capacity	Waste storage	Waste storage - other types of waste	Any other types of waste stored	C	1. Site inspection 2. Audit interviews	Only authorised scheduled activities as detailed in this condition were observed to be undertaken on the site at the time of the site inspection.				
Scheduled Activity	Fee Based Activity	Scale															
Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity															
Waste storage	Waste storage - other types of waste	Any other types of waste stored															
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 style="text-align: left;">Premises Details</th> </tr> </thead> <tbody> <tr> <td>CLYDE TRANSFER TERMINAL PARRAMATTA ROAD CLYDE NSW 2142 PART LOT 201 DP 1007683</td> </tr> </tbody> </table>	Premises Details	CLYDE TRANSFER TERMINAL PARRAMATTA ROAD CLYDE NSW 2142 PART LOT 201 DP 1007683	C	1. Site inspection	The Clyde Transfer Terminal is located on Lot / plan described in this condition.											
Premises Details																	
CLYDE TRANSFER TERMINAL PARRAMATTA ROAD CLYDE NSW 2142 PART LOT 201 DP 1007683																	
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 the 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>	C	1. Operational Environmental Management Plan (MAN-14631-1) 2021 and subplans 2. Environmental Monitoring Program (MAN-14012) 2022	Site operations are carried out in accordance with approved OEMP and subplans. Monitoring and compliance audits are undertaken as per the schedules outlined in the environmental monitoring plan.													
2	Discharges to Air and Water and Applications to Land																
P1	Location of monitoring /discharge points and areas																
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="4" style="text-align: center;">Air</th> </tr> <tr> <th style="text-align: left;">EPA identification no.</th> <th style="text-align: left;">Type of Monitoring Point</th> <th style="text-align: left;">Type of Discharge Point</th> <th style="text-align: left;">Location Description</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Air emissions monitoring; Discharge to air</td> <td>Air emissions monitoring; Discharge to air</td> <td>A 2.64 diameter exhaust stack, 21 metres above ground level installed centrally to the roof line supported off the mezzanine level, labelled as "New stack 2640mm" on map titled "Stack position-centre discharge" submitted to the EPA on 5 Nov 2007</td> </tr> </tbody> </table>	Air				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Air emissions monitoring; Discharge to air	Air emissions monitoring; Discharge to air	A 2.64 diameter exhaust stack, 21 metres above ground level installed centrally to the roof line supported off the mezzanine level, labelled as "New stack 2640mm" on map titled "Stack position-centre discharge" submitted to the EPA on 5 Nov 2007	C	1. Site inspection	The single air emission point was observed on the roof of the transfer terminal (north eastern side) during the site inspection.	
Air																	
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description														
1	Air emissions monitoring; Discharge to air	Air emissions monitoring; Discharge to air	A 2.64 diameter exhaust stack, 21 metres above ground level installed centrally to the roof line supported off the mezzanine level, labelled as "New stack 2640mm" on map titled "Stack position-centre discharge" submitted to the EPA on 5 Nov 2007														
3	Limit Conditions																
L1	Pollution of waters																
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	C	1. Site inspection	Evidence of potential stormwater contamination was not observed during the site inspection. The stormwater management plan was determined to be adequately implemented on site at the time of the site inspection.													

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Environmental Protection License (No. 11763)**

Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification Number																				
L2	Waste																								
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</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"> <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 processing (non-thermal treatment) Waste storage</td> <td>NA</td> </tr> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>As defined in Schedule 1 of the POEO Act, in force from time to time</td> <td>Waste processing (non-thermal treatment) Waste storage</td> <td>NA</td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste processing (non-thermal treatment) Waste storage	NA	NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste processing (non-thermal treatment) Waste storage	NA	C	<ol style="list-style-type: none"> 1. Site Inspection 2. Waste Records 3. Waste Management Plan 4. Audit Interview 	<p>Waste received on site was observed to only consist of general solid waste during the site inspection. A review of the waste records confirmed this.</p> <p>The Waste management plan outlines the requirements for waste classification and screening . Interviews with site personnel demonstrated that they had a good understanding of what waste is accepted, screening procedures and what to do in the event non-conforming waste is identified on site.</p>						
Code	Waste	Description	Activity	Other Limits																					
NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste processing (non-thermal treatment) Waste storage	NA																					
NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, in force from time to time	Waste processing (non-thermal treatment) Waste storage	NA																					
L2.2	The authorised amount of waste permitted on the premises cannot exceed 4,000 tonnes at any one time.	C	<ol style="list-style-type: none"> 1. Audit Interview 2. Site Inspection 	<p>Interviews with site personnel confirmed that the capacity of the terminal shed is ~950 t, waste is constantly being moved from the terminal floor into the compactor and containers ready for transport. Waste is transported off site daily.</p> <p>For the week of 5-11/12/2022 between 1,600 and 1,900 tonnes per day were removed by train. During the inspection it was noted that less than 500 tonne of waste was within the transfer terminal.</p>																					
L3	Noise limits																								
L3.1	<p>Noise generated at the premises must not exceed the noise limits presented in the table below:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day - LAeq (15 min)</th> <th>Evening - LAeq (15 min)</th> <th>Night - LAeq (15 min)</th> <th>Night- LA1 (1 min)</th> </tr> </thead> <tbody> <tr> <td>First St, Granville (nearest residence)</td> <td>44</td> <td>38</td> <td>39</td> <td>56</td> </tr> <tr> <td>10 Hampstead Rd, Auburn</td> <td>40</td> <td>38</td> <td>38</td> <td>54</td> </tr> <tr> <td>17 Cumberland Rd, Auburn</td> <td>41</td> <td>39</td> <td>39</td> <td>52</td> </tr> </tbody> </table>	Location	Day - LAeq (15 min)	Evening - LAeq (15 min)	Night - LAeq (15 min)	Night- LA1 (1 min)	First St, Granville (nearest residence)	44	38	39	56	10 Hampstead Rd, Auburn	40	38	38	54	17 Cumberland Rd, Auburn	41	39	39	52	C	<ol style="list-style-type: none"> 1. Incident records 2. Noise Monitoring Reports 2. Audit Interviews 	<p>Interviews with site personnel confirmed that no noise complaints had been received during the audit period. This was also confirmed by checking RIVO (system where all complaints are management).</p> <p>A review of the Truck Noise monitoring report also confirmed that there had not been any exceedances during the audit period.</p>	
Location	Day - LAeq (15 min)	Evening - LAeq (15 min)	Night - LAeq (15 min)	Night- LA1 (1 min)																					
First St, Granville (nearest residence)	44	38	39	56																					
10 Hampstead Rd, Auburn	40	38	38	54																					
17 Cumberland Rd, Auburn	41	39	39	52																					
L3.2	<p>For the purpose of Condition L3.1:</p> <p>a) Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays,</p> <p>b) Evening is defined as the period from 6pm to 10pm</p> <p>c) Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays</p> <p>d) LAeq(15minute) is defined as the equivalent continuous 'A' weighted sound pressure level- the energy average of the noise measured over a 15 minute period.</p> <p>e) LA1 (1 minute) is defined as the sound pressure level exceeded for one percent of a 1 minute measurement period.</p>	NT	N/A	This is a note only not auditable																					
L3.3	Noise from the Clyde Transfer Terminal premises is to be measured at the most affected point on or within the residential boundary to determine compliance with the LAeq(15 minute) noise limits in condition L3.1.	NT	N/A	No complaints were received within the audit period, therefore this condition is not relevant for this audit period.																					
L3.4	Noise from the Clyde Transfer Terminal premises is to be measured at 1m from the dwelling façade to determine compliance with the LA1(1 minute) noise limits in condition L3.1.	NT	N/A	No complaints were received within the audit period, therefore this condition is not relevant for this audit period.																					
L3.5	The noise emission limits identified in condition L3.1 apply under meteorological conditions of: - wind speeds up to 3 m/s at 10 metres above ground level; and/or - temperature inversion conditions of up to 3 degrees Celsius/100m.	NT	N/A	No complaints were received within the audit period, therefore this condition is not relevant for this audit period.																					
L4	Potentially offensive odour																								
L4.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.	C	<ol style="list-style-type: none"> 1. Site Inspection 2. Clyde Odour Audit XXXIX 	<p>There was minimal odour identified during the site inspection immediately outside the entrance to the terminal floor and within close proximity to the shed, however there was no odour detected further beyond this area during the site inspection</p> <p>A review of the 2022 Odour audit confirmed that there were no exceedances.</p>																					

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
L5	Other limit conditions				
L5.1	The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the Protection of the Environment Operations (Waste) Regulation 2014.	C	1. This IEA	There was no evidence of non-compliance with the conditions of the EPL or the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> observed during the audit.	
4	Operating Conditions				
O1	Activities must be carried out in a competent manner				
O1.1	licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	C	1. OEMP and subplans 2. Audit interviews 3. Site Inspection 4. Training records	A review of management plans, personnel interviews and observing operations confirmed that the activities undertaken on site appeared to be carried out in a competent manner. Training records were also observed during the site inspection confirming staff complete relevant training.	
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.	C	1. Maintenance records for the weighbridge 2. Calibration certificates 3. Maintenance records/receipts 3. Site inspection	During the site inspection all operational plant and equipment was observed to be in good condition. There are two of every essential plant (e.g. front end loaders and container loaders) on site to minimise disruption to operations in the event of a breakdown/maintenance and repairs required. it was noted at the time of the site inspection the street sweeper was not operational (had a contractor undertaking sweeping whilst out of action), one lifter was not operational and was due for a service. Maintenance records are maintained in SAP: e.g. maintenance contract with Komatsu - come and repair as required under a standing Service Agreement: - Komatsu monitor "hours operated" to identify when maintenance is required on machinery Weighbridge calibration occurs twice a year (last one occurred on 25/9/22 - record sighted) Equipment checklist sighted - completed daily (if machine is being used the checklist remains in the machinery and stored in then stored in the site office at end of week).	
O3	Dust				
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	C	1. Site inspection	No evidence of dust generation was observed at the time of the site inspection.	
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	C	1. Site inspection 2. Driver induction	No trucks entering and leaving the premises were observed to be uncovered. Interviews with site personnel confirmed that waste accepted at the site are via contract only and are compactor trucks or enclosed trucks.	
O4	Emergency Response				
O4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.	C	1. Emergency Response Plan - Clyde Transfer Terminal (ERP) - 8/12/2022 3. Crisis/Incident/ Emergency Debrief Report - Hot Load (8/12/2022)	The emergency response plan incorporates the pollution incident response plan which includes (but not limited to): - Description and likelihood of hazards - Potential pollutants on site - Safety equipment - PIRMP implementation - Scenarios - Roles and responsibilities - Emergency response - Review/communications A drill to test the hot load procedures, ERP, spill response and the pollution incident response Management Plan (PIRMP) was undertaken on 8/12/2022 to confirm the adequacy of the plans and the implementation of the plans. Learning and actions from the drills is disseminated to staff through the debrief note and toolbox meeting as required. A copy of the emergency drill debrief was sighted during the sit inspection and audit interviews.	
O4.2	The licensee must have adequate fire prevention measures in place, and ensure that facility personnel are able to access fire-fighting equipment and manage fire outbreaks at any part of the premises.	C	1. Site Inspection	Fire prevention equipment was observed at various locations of the site during the site inspection. Fire extinguishers and hydrants/hoses.	

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O5	Processes and management												
O5.1	The licensee must ensure that any general solid waste (putrescible) and/or general solid waste (non-putrescible) received for storage or recovery or processing at the premises is assessed and classified in accordance with the DECC Waste Classification Guidelines as in force from time to time.	C	1. Site inspection 2. NSW Resource Recovery Incoming Waste Classification Flowchart & Incoming Weighbridge Report	Weighbridge records all required specification noted and recorded data available in the PWS Report 5-11/12/22 (sighted). Weighbridge operator was familiar with waste classification and requirements of general solid waste Operator who was interviewed had good understanding of what items constituted non-conforming waste and how to manage its handling and disposal									
O5.2	The licensee must ensure that each waste for recovery/recycling is stockpiled separately.	C	1. Site Inspection	Only general waste is accepted at the site. This is managed through the weighbridge checks - verbal confirmation from the driver and cameras. They follow the nonconformance procedures which include verbal warnings, refusal of entry etc.									
O6	Waste Management												
O6.1	Stormwater and wastewater management – operating phase. All areas that involve the handling of waste including container transfer and handling areas, clean container storage areas and internal roadways must be sealed.	C	1. Site Inspection	All operational areas of the site were sealed.									
O6.2	Vehicles leaving the premises must not track materials to external surfaces.	C	1. Site Inspection 2. Daily inspection checklist	Evidence of very minor amounts of litter observed on site, however the site is checked twice daily (litter patrols) for clean-up to ensure waste does not leave site. The waste observed was not located in an area where it could be reasonably expected to migrate offsite.									
5	Monitoring and Recording Conditions												
M1	Monitoring records												
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	C	1. Veolia CTT website 2. Veolia record management system	All monitoring records are stored and maintained in internal system. These were sighted (odour since 2005; noise 2008) and also published on the Veolia CTT website.									
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.	C	1. Veolia CTT website 2. 2017 IEA 3. 2017 Odour Audit.	Records date back to 2005/2006. These are all published on the Veolia CTT website.									
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	C	1. Odour Audit XXXVII 2. Annual Truck Noise Measurements Report 15	A review of the 2022 Odour Audit and the truck noise monitoring report 16 confirmed that the requirements of this condition have been met									
M2	Requirement to monitor concentration of pollutants discharged												
M2.1	Air <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Other</th> <th>Units of Measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>Selection of sampling positions</td> <td>-</td> <td>-</td> <td>TM-1</td> </tr> </tbody> </table>	Other	Units of Measure	Frequency	Sampling Method	Selection of sampling positions	-	-	TM-1	NT	N/A	Not triggered during the audit period	
Other	Units of Measure	Frequency	Sampling Method										
Selection of sampling positions	-	-	TM-1										
M3	Recording of pollution complaints												
M3.1	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.	C	1. CTT Complaints Recording system (RIVO)	Interviews with site personnel confirmed that there have been no complaints made during the audit period. RIVO system sighted and staff demonstrated they can navigate through the process for complaints management.									

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
M3.2	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.	C	1. CTT Complaints Recording system (RIVO)	Interviews with site personnel confirmed that there had been no complaints made during the audit period. Site personnel navigated through the complaints system in RIVO. The requirements of this condition are included in the online form.	
M3.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	NT	N/A	Audit interviews and a review of the complaints management system confirmed that there have been no complaints received within the past four years	
M3.4	The record must be produced to any authorised officer of the EPA who asks to see them.	NT	N/A	Not relevant to the current audit period	
M4	Telephone complaints line				
M4.1	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.	C	1. Veolia CTT Website 2. Community complaints line	A dedicated hotline number is available on the Veolia CTT website. Interviews with site personnel confirmed that all complaints go through the weighbridge and staff are trained in complaints handling.	
M4.2	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.	NT	N/A	The complaints phone number and email address is detailed on the CTT website	
M4.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	NT	N/A	Not relevant to the current audit period	
6	REPORTING CONDITIONS				
R1	Annual return documents				
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 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.	C	1. Annual Return Summary From 2021-2022	The 2021 - 2022 annual return was reviewed confirming that it was on the approved form. An email receipt for the AR submission was also sighted (14/3/2022).	
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	C	1. Annual Return Summary From 2021-2022 2. Annual Return Report	The 2021 - 2022 annual return was reviewed and an email receipt for the AR submission was also sighted (14/3/2022).	
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.	NT	N/A	Licence has not been transferred - this condition is therefore not relevant to this audit period.	

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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.	NT	N/A	License 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').	C	1. Annual Return 2021 - 2022 2. Annual Return submission receipts	Email receipt confirming the submission of the 2021 - 2022 AR dated 14/3/2022 was sighted.	
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.	C	1. Annual Return 2021 - 2022	AR for 2018 - 2022 sighted 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.	C	1. Annual Return 2021 - 2022	AR is signed by an appropriate delegate.	
R2	Notice of environmental harm				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	NT	N/A	No exceedances or environmental harm occurred during the audit period - this condition is therefore not triggered.	
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	NT	N/A	No exceedances or environmental harm occurred during the audit period - this condition is therefore not triggered.	
R3	Written report				
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	NT	N/A	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.	NT	N/A	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.	NT	N/A	No written reports have been requested by an authorised officer. Therefore this condition is not triggered for this audit period.	
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	NT	N/A	No written reports have been requested by an authorised officer. Therefore this condition is not triggered for this audit period.	

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Condition Ref	Requirement (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
7	GENERAL CONDITIONS				
G1	Copy of licence kept at the premises or plant				
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	C	1. Site Inspection	A hardcopy of the EPL was observed in the site office (on the notice board) and weighbridge office during the site inspection.	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	NT	N/A	Licence has not been requested by an EPA officer during the audit period. Not relevant to the current IEA period	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises	C	1. Site Inspection	A hardcopy of the EPL was observed in the site office (on the notice board) and weighbridge office during the site inspection.	
G2	Other general conditions				
G2.1	The licensee must establish a community environment liaison committee, comprising representatives of the community, the applicant, Parramatta City Council and Auburn Council that will meet at least quarterly. Representatives from relevant NSW Government agencies (including the Department of Planning and the Department of Environment and Climate Change) may be invited to attend meetings as required. Discussion at the meetings must include the progress in implementation of the development consent and other statutory approvals, and must provide adequate time for the community to raise matters of concern associated with the environmental impact of the development, with a view to achieving mutually satisfactory solutions.	C	1. Veolia CTT website 2. Email distribution list 3. Newsletter	Veolia have submitted a request for a modification to the development consent given efforts made to date for a community committee have been largely unsuccessful. Once approved the intent is to apply to amend this condition in the EPL	
8	SPECIAL CONDITIONS				
E1	Requirement to maintain financial assurance				
E1.1	(a) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA prior to 30 June 2015. The financial assurance must be in favour of the EPA in the amount of one hundred thousand dollars (\$100,000). 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. (b) A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by 30 June 2017. The financial assurance must be in favour of the EPA for a total amount to be held by the EPA of two hundred thousand dollars (\$200,000). 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. Note that this total financial assurance is inclusive of that required in E1.1a). (c) The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by the Australian Prudential Regulatory Authority (APRA).	C	1. Email records of financial assurance	Bank guarantee sighted during the audit (#150568) expires 2035 (\$200,000). Ste personnel confirmed that there had been no changes made to the bank guarantee and no claims had been made by the EPA during the audit period.	
E1.2	The financial assurance must be maintained during the operation of the premises and thereafter until such time as the EPA is satisfied the premises are environmentally safe.	C	1. Email records of financial assurance	Bank guarantee sighted during the audit (#150568) expires 2035 (\$200,000). Ste personnel confirmed that there had been no changes made to the bank guarantee and no claims had been made by the EPA during the audit period.	
E1.3	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed 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.	C	1. Email records of financial assurance	Bank guarantee sighted during the audit (#150568) expires 2035 (\$200,000). Ste personnel confirmed that there had been no changes made to the bank guarantee and no claims had been made by the EPA during the audit period.	
E1.4	The EPA may require an increase in 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.	C	N/A	Site is still operational. This condition is not relevant to the current audit period.	

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E1.5	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 E1.1; or (b) the adjusted financial assurance as required by condition E1.3 and E1.4.	C	1. Email records of financial assurance	Bank guarantee sighted during the audit (#150568) expires 2035 (\$200,000). Ste personnel confirmed that there had been no changes made to the bank guarantee and no claims had been made by the EPA during the audit period.	
E2	Environmental obligations of licensee (Works and Programs)				
E2.1	While the licensee's premises are being used for the purpose to which the licence relates, the licensee must: (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.	C	1. Site Inspection, 2. ERP -2021 3. Non-Conforming Waste Procedure	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.	
E2.2	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 an assessment of and if required remediation of any site contamination.	NT	N/A	Site is still operational. This condition is not relevant to the current audit period.	
E3	EPA may claim on a financial assurance				
E3.1	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.	NT	N/A	Not relevant to the current audit period	

Clyde Transfer Terminal
2022 Independent Environmental Audit
Implementation of the OEMP and associated Sub-Plans

Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
Operational Environmental Management Plan (OEMP)					
4.1.1	Facility Manager: <ul style="list-style-type: none"> - Approve and implement the OEMP; - Report to senior management on the performance of the system and environmental issues/breaches etc; - Allocate project resources to handle environmental issues; - Take action to resolve major non-conformances; - Ensure suppliers and subcontractors comply with requirements; and - Ensure that site personnel receive appropriate environmental awareness training, in consultation with the EMR. 	C	1. Position Description for the Facility Manager	Interviews with site personnel confirmed that the position description for the facility manager has not changed from the previous audit. Discussions held throughout the interviews confirmed that the facility manager had a good understanding of the OEMP and subplans and their role in implementing them.	
4.1.2	Environmental Management Representative: <ul style="list-style-type: none"> - Report to the Facility Manager on the performance of the system and improvement opportunities; - Provide support to the site to ensure they are aware of their environmental obligations and enable them to meet their environmental commitments; - Ensure that non-conformances are recorded and actioned; and - Prepare the Annual Environmental Management Report. 	C	1. Position Description for the Environmental Management Representative (EMR)	Interviews with site personnel confirmed that the position description for the environmental management representative has not changed from the previous audit. Discussions held throughout the interviews confirmed that the environmental management representative had a good understanding of their role.	
4.2	A training matrix has been developed for the CTT, based on Veolia's Training and Development Standard, which requires corporate/site specific inductions, competency based training requirements for operators, as well as administrative, risk and emergency response training.	C	1. Corporate Induction 2. Contractor and site visitor Induction 3. Training records	Training records are currently held across four different areas. A training matrix is still being developed. Corporate training - system sighted <ul style="list-style-type: none"> - Bridge (corporate training) identifies course required to be completed and one completed. E.g. WHS, ethics etc. Cloud assess - identifies drivers licence, tickets etc. Site personnel confirmed that Veolia are still transitioning with SUESZ systems.	
4.2.1	All employees receive a corporate induction which provides an awareness of Veolia's commitment to the environment and sustainability. Components of Veolia's general induction program are as follows: <ul style="list-style-type: none"> - Veolia corporate induction via LMS online modules; - Safety, health, environment and quality induction As relevant, operational employees receive site specific inductions, including suitable environmental training, to ensure they are aware of their responsibilities and are competent to carry out their work as per the next section.	C	1. Corporate Induction 2. Contractor and site visitor Induction 3. Training records	Site personnel interviewed confirmed that all contractor /subcontractors undergo a corporate and / or site induction. A copy of the contractor and site visitor induction was received. The online corporate training package (including the sustainability section) was sighted. Training attendance records for were received for: <ul style="list-style-type: none"> - Dust Management - Odour Management - Stormwater Management - Traffic Management - Waste Management 	
4.2.2.1	In addition to the general induction, all employees receive site specific training covering the following: <ul style="list-style-type: none"> - OEMP and related documents; - Site environmental objectives and targets; - Understanding individual authorities and responsibilities; - Significant project aspects, impacts and controls; - Potential consequences of departure from procedures; - Emergency procedure and response; and - Understanding the legal obligations. All staff are to be reassessed twice within the first year to ensure they maintain the required level of training, including compliance with relevant procedures.	C	1. Contractor and site visitor Induction 2. Training records Toolbox Record 20/7/2022 3. Audit Interview	Site personnel confirmed that all staff are trained as required: <ul style="list-style-type: none"> - All personnel complete a company induction - All site personnel complete site specific training /induction as well as management plans specifically related to their role/work tasks. It was also confirmed during audit interviews that training styles will depend on the document type (management plan/work procedure etc): <ul style="list-style-type: none"> - Small plan / document: staff are expected to read the document independently and sign off that they understand the compliance requirements of the document (specifically their role and responsibilities) - Large plan / document - Site Supervisors will go through the overarching objectives of the documents, and specifically focus on the relevant information to their specific roles and responsibilities If Management plans / work procedures etc undergo any changes - the changes are communicated to all staff in toolbox meetings Emergency drills are undertaken regular to train site personnel in emergency response	CTT-MP-OFI-01
4.2.2.3	A compulsory site induction has been established for the customers on how to induct their drivers accessing the site. The driver induction includes but is not limited to the following conditions of entry: <ul style="list-style-type: none"> - Left turn entry and exit from Parramatta Road; - All Waste Drivers reporting to weighbridge personnel; - Use of Personal Protective Equipment (PPE's); - Visitor restrictions; - No smoking on site except in designated areas; - Obeying traffic signs; - On-Site machinery has right of way; - Following instructions from site staff; - Reporting to Hot Load zone upon arrival if carrying a Hot Load and contacting staff; - Ensuring tailgate is clean and any loose material removed before exiting the waste shed; - Reporting incidents, injuries and spills; - Punitive action for non-compliance with conditions of entry; Following this training program all drivers are required to undertake a questionnaire as proof of induction and to ensure competency.	C	1. Contractor and site visitor Induction 2. Training records	A hardcopy of the driver and visitor inductions were sighted at the site office. Site personnel confirmed that this training is now completed online.	
4.3	Internal communication methods include the following, as applicable: <ul style="list-style-type: none"> - Monthly toolbox meetings; - Annual risk management audit reports; - Non-conformance reports - Noticeboards; - Employee induction and training, refer to Section 4.2. 	C	1. Toolbox examples 2. 2021 compliance audit check	Document review confirmed compliance with the requirements of this condition: <ul style="list-style-type: none"> - Regular toolbox meetings are undertaken - Red alerts (lessons learnt across the business) are sent to senior management for dissemination / discussion with staff - Noticeboards in the weighbridge and site office (sighted licence conditions, site maps, emergency procedures, waste non-compliance information etc) 	

**Clyde Transfer Terminal
2022 Independent Environmental Audit
Implementation of the OEMP and associated Sub-Plans**

Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
4.3	External communication methods and their respective time frames include the following, as applicable: <ul style="list-style-type: none"> - Annual regulatory reports - Annual public notices and announcements - Meetings and correspondence with appropriate regulatory authorities, as required - Correspondence with adjoining landowners / neighbours, as required - Prompt response to complaints 	C	<ol style="list-style-type: none"> 1. Annual report 2. Community Newsletters 3. Meeting minutes with the regulators 	Document review and interviews with site personnel confirmed compliance with the requirements of this condition: <ul style="list-style-type: none"> - AR's are submitted on an annual basis (evidence they have been submitted on time were sighted) - Community newsletters (current one in draft format yet to be published) - Correspondence with regulatory authorities (emails) 	
4.3.2	As a result of a decline in community interest, Condition 134 of the COCs was modified to allow for alternate measures of community engagement if a Community Consultative Committee (CCC) cannot be maintained. Alternate measures listed below have been proposed and approved by the DPE: <ul style="list-style-type: none"> - Publishing the community information phone line and email address on the Veolia's Corporate Website on the Clyde Transfer Terminal webpage (https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station) for all stakeholders to make enquiries, complaints or seek more information. - Inviting community members to an Open Day at Clyde Transfer Terminal including all parties that put submissions to the Development Consent modification application submitted in 2017. - Creation of an email distribution list to engage with interested stakeholders on a routine basis communicating updates on activities on site. - Sending Clyde Transfer Terminal's Annual Environmental Management Reports (AEMR) to Cumberland Council. - Other means of liaising with the community include local newsletters, leaflets, newspaper advertisements, and community notice boards as deemed appropriate. 	C	<ol style="list-style-type: none"> 1. Veolia CTT website 2. Community Newsletter 	A review of the Veolia CTT website confirmed: <ul style="list-style-type: none"> - Information regarding the site and its activities - Community feedback and complaints Line / email link - Compliance reporting documents 	
4.3.4	Receiving public comments from the impacted community is possible through the 24-hour operated weighbridge office telephone number listed above. The Facility Manager and/or EMR are notified of all public complaints. All public complaints received (either written or verbal) are documented in the online Complaints Register which contains the following information: <ul style="list-style-type: none"> - the nature and extent of the complaint; - the details of the person lodging the complaint; - details of location, date, time and effects of the complaint; - the action taken to address the complaint including follow up contact with the complainant. The Register is kept updated to ensure any complaints are correctly recorded and addressed.	C	<ol style="list-style-type: none"> 1. Audit Interview 	Interviews with site personnel and a review of the complaints register confirmed that there have been no complaints received during the audit period.	
4.4.2.1	Incident notification processes will reflect the extent of the event and the incident classification. Reporting will be in accordance with the Veolia Incident Management Procedure - PRO-317 as summarised in Figure 4.2. This procedure is used for the response, investigation and reporting of incidents that have affected or have the potential to affect the environment or health and safety of a worker, contractor, subcontractor or a visitor to Veolia. Incidents are logged in Rivo and managed in the following sequence: <ul style="list-style-type: none"> - Log incident; - Investigate incident; - Close incident; If further action is required, an issue can be raised or logged in Rivo. Issues raised are assigned for action to specific Veolia personnel. Corrective action can then be implemented to minimise the risk of recurrence of the incident.	C	<ol style="list-style-type: none"> 1. Audit Interviews 2. Complaints register training records 	Interviews with site personnel confirmed that there have been no incidents during the audit period. Complaints training register sighted during the site inspection.	
Table 5.1	Regular environmental inspections are undertaken by the CTT personnel to ensure that environmental controls have been implemented, meet specification, and are being maintained in accordance with the NSW Inspecting and Testing Program as summarised in Table 5.1 below.	C	<ol style="list-style-type: none"> 1. Weekly inspection checklist 2. Weighbridge certifications (25/9/2022) 3. Weighbridge repair and verification report (25/9/2022) 4. Weather station service 14/10/2022 5. Veolia CTT Website 	Weekly and monthly inspection checklists (completed) sighted. Weighbridge inspections, repair and verification undertaken by SSS weighbridge specialists. Weather station service undertaken by HS Pty Ltd	
Table 5.2	At completion of each inspection, any corrective actions required are to be recorded in Rivo and managed in a timely manner summarised in Table 5.2 below:	C	<ol style="list-style-type: none"> 1. Weekly inspection checklist 2. Odour Audit XXXIX June 2022 3. Veolia CTT website 4. RIVO 	Weekly inspection checklists (completed) were sighted during the site inspections. The June 2022 Odour Audit confirmed that there was no requirement to implement corrective actions during the audit period All odour reports are published on the Veolia CCT website It was confirmed during the site inspection that the weekly checklists are uploaded and maintained in the electronic document control system.	
5.1.2	In the event that any monitoring results demonstrate an exceedance of a limit specified in the COCs, Veolia will submit a report to DPE and Cumberland Council within 30 days of the monitoring exceedance, stating: <ol style="list-style-type: none"> a) The reason for the exceedance; b) Action taken to ensure the limit is not exceeded in the future; c) Proposed action to ensure the limit is not exceeded in the future; d) Timetable for implementing the proposed action in c); and e) Results of additional monitoring which has been conducted within 7 days of the action taken in b) and c) above, to demonstrate compliance with the limit. 	NT	<ol style="list-style-type: none"> 1. Audit Interviews 	Interviews with site personnel confirmed that there have been no exceedances in the audit period.	
5.1.3	Audit reports are maintained in Rivo to enable non-conformances and opportunities for improvement, identified through internal and external audit processes at the CTT, to be recorded, reported and responded to.	C	<ol style="list-style-type: none"> 1. 2021 IEA Report 2. Rivo 3. Veolia CTT website 	Recommendations from 2021 IEA have been uploaded into systems (sighted) includes: item, raised by who, actioning officer, description whether it has been resolved, due dates etc. The 2021 IEA is also available on the Veolia CTT website	
5.2	Reviews of the CTT OEMP and the environmental performance of the CTT assess the continuing suitability, adequacy and effectiveness of the onsite environmental management measures implemented. The inputs to the management review process will include (but not be limited to): <ul style="list-style-type: none"> - internal and external audits findings; - incidents management and investigation of non-conformance events, incidents, near misses and management of all complaints received; - implementation of all compliance and legislative changes as identified at a corporate level; and - trend analysis on operational data. 	C	<ol style="list-style-type: none"> 1. Meeting invitations 2. Monthly environmental reporting 	DMS: Doc review process includes the following: environmental team make changes, site manager reviews, Environmental manager reviews, audit findings get presented to upper manager (corporate heads of ops and site etc), doc control on reports etc: - e doc owner, subject matter experts, approver and validator for every document, example : BCP sighted. internal system also has a workflow to ensure it goes through all channels prior to being released.	

Clyde Transfer Terminal
2022 Independent Environmental Audit
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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification Number
5.2	Reviews are made periodically of all site specific key performance indicators pertaining to the environment and relevant business systems. This will include reviews, and if necessary, revision of the OEMP and sub-plans following any audit, major incident or series of complaints, or any modifications to the consent.	C	1. Monthly environmental reporting 2. SHEQ objectives	Veolia have moved away from KPI 's to a more proactive approach: - Staff undertake "interactions" to share information between sites and staff regarding hazards/incidents/lessons learnt etc. Site Managers undertake a number of "interactions" for the month which are included in the monthly reporting. SHEQ group meets regularly to investigates/discuss incidents (when they . Data is tracked well as demonstrated through RIVO - moving away from "KPIs" to a more proactive approach - encouraged to have interactions, report events etc, Corporate targets - focus on improving environmental management - nationwide targets as opposed to site specific targets.	
5.2	The following forums will form part of the management review process at the CTT, conducted periodically by the facility management, in conjunction with operators as required: '- Meetings; - Toolbox talks; - Hazard review groups; - Serious incident reviews; and - Miscellaneous environmental workshops	C	1. Monthly environmental reporting 2. Toolbox meeting examples	Toolbox meetings (non management meetings) are undertaken on a semi regular basis - frequency is based on what is relevant at the time. Regulatory changes tracked by environmental team - communicated to Site Manager who disseminates information via toolbox meetings to site personnel. SHEQ group meets regularly to investigates/discuss incidents (when they occur)	
5.3	All technical sample analysis for compliance reporting will be performed in a NATA registered laboratory.	NT	N/A	Not required by the EPL, however water samples are sent to ALS which is a NATA accredited lab.	
5.3	Where monitoring and measuring devices are used to provide evidence of conformity of product to determined requirements, these devices will be calibrated in accordance with the manufacturer's recommendations. Records of calibration will be maintained and the calibration status of the device will be clearly communicated	C	1. Clyde Truck Noise Monitoring - Report 15 2. Air Met Certificate of Calibration (sound level meter) 4/10/222	Calibration records for the sound level meter is included in the truck noise monitoring report. Calibration certificates for the noise level meter were received confirming compliance with these requirements.	
Waste Management Plan (WMP)					
1.4.1	The following government agencies will be consulted with in relation the requirements of this WMP: '- NSW Department of Planning, Industry and Environment; - NSW Environment Protection Authority; - Cumberland City Council	C	1. DPE letter - submission of OEMP 18/11/2021 2. Cumberland Council letter - DC consultation 16/12/2022 3. Annual Return 2021-2022 submission	Site personnel confirmed that the original WMP was prepared in consultation with Council, DPE and EPA. As the plan didn't go through major updates that could affect stakeholders, the updated version was only sent to DPE in 2021.	
4.1	All waste transport vehicles entering the CTT are required to go via the incoming weighbridge. The customer information is entered into the Paperless Weighbridge System (PWS) prior to their arrival on site to ensure all customers are aware of conforming and non-conforming waste. The weighbridge operator is responsible for verifying the vehicle's registration number in PWS. Once the customer is verified and the weight is recorded, the weighbridge operator directs the trucks to the transfer terminal building for processing. Waste transport vehicles exiting the site are weighed on the outgoing weighbridge to confirm the weight of waste deposited at the site.	C	1. Site Inspection 2. Weighbridge Operators work instruction 3. Audit Interviews	Weighbridge records all required specification noted and recorded data available in the PWS Report 5-11/12/22 (sighted). Weighbridge operator was familiar with waste classification and requirements of general solid waste Operator who was interviewed had good understanding of what items constituted non-conforming waste and how to manage its handling and disposal	
4.1	All weighbridges on the site are National Measurement Institute (NMI) approved and maintained in proper working order and are certified at least once a year in accordance with the Commonwealth National Measurement Act 1960.	C	1. Weighbridge Calibration 2021	RFI - Weighbridge Calibration records sighted. - Confirmed sighted and photographed	
4.1	Records of waste transport are maintained by Veolia for submission to the EPA and quantification of the waste levy payable.	C	1. Quarterly waste contribution report	The waste contribution report was observed during the IEA.	
4.2	The CTT is licensed to accept the following waste types and operate 24 hours per day, 7 days per week: '- General Solid Waste (Putrescible) - General Solid Waste (Non-Putrescible) The EPL permits waste processing (non thermal treatment) and waste storage activities at the facility.	C	1. Site Inspection	Only general waste was observed during the site inspection.	

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Reference	Commitment (Exact Wording)	Audit Finding	Evidence Reviewed	Independent IEA Findings	Unique Identification Number												
4.2.2	Hazardous, liquid and industrial waste would not be allowed at the site. The following non-conforming waste types are not accepted at the CTT: <ul style="list-style-type: none"> - Radioactive wastes - Toxic wastes including any: <ul style="list-style-type: none"> - Material containing arsenic, cyanide or sulphide - Toxic soluble salts of the following metals: barium, boron, cadmium, copper, chromium, lead, manganese, mercury, selenium, silver or zinc - Pesticide or weedicide, in particular any of the following: <ul style="list-style-type: none"> - Chlorinated hydrocarbons - Fluorinated hydrocarbons - Organophosphates - Carbamates - Phenols - Soluble acid or alkali or acidic or basic compounds - Liquid wastes <ul style="list-style-type: none"> - Hazardous wastes e.g. Asbestos - Any flammable liquid or material deriving from grease, oil, tar petroleum, shale or coal - Any sludge or material (unless it can be shown to be innocuous and harmless) being the refuse from any industrial process carried out in any: <ul style="list-style-type: none"> - Tanning or leather processing plant - Petroleum or petrochemical plant - Chemical plant - Paint manufacturing plant - Metal treatment plant - Vegetable oil or mineral oil processing plant - Pharmaceutical or drug manufacturing plant - Medical and quarantine wastes - Dead animals 	C	<ol style="list-style-type: none"> 1. Site Inspection 2. Work Instruction for loader operations 3. Work instruction for weighbridge operations 4. Audit Interviews with site operators 	<p>No non-conforming waste was observed during the site inspection. A</p> <p>Interviews with site operators during the site inspection confirmed that they were familiar with non-conforming waste procedures for non confirming waste.</p> <p>The work instruction for weighbridge operations included instructions for inspection for and removal of non-conforming waste.</p>													
4.2.3	Details of the waste received, including identification of the vehicle, weight, nature and origin of the waste, are recorded at the weighbridge, and inspection of the load is undertaken at the unloading point to verify information provided at the weighbridge.	C	<ol style="list-style-type: none"> 1. Incoming and outgoing waste records 	<p>Weighbridge records all required specification noted and recorded data available in the PWS Report 5-11/12/22 (sighted).</p>													
4.3	If a load is identified as offensive (odorous or dusty) it is prioritised for compaction and loading into the sealed containers and recorded using the Incident Management System. This is supplemented with spot checks by the Facility Manager or site personnel.	C	<ol style="list-style-type: none"> 1. Audit interview 2. Site inspection 	<p>Compaction is undertaken continuously throughout the day to minimise the time that waste material is sitting on the floor. Dust and odour are managed in accordance with the associated management plans.</p>													
4.3	Where non conforming waste is detected, this waste would be separated from the general waste stream and set aside for removal offsite to a facility licensed to receive this type of waste for processing, recycling or disposal.	C	<ol style="list-style-type: none"> 1. Audit interview 2. Site inspection 	<p>A Steel bin and gas cylinder bins were observed on site during the site inspection. All identified waste steel and gas cylinders are collected and stored in separate bins for recycling. These are transported offsite to an appropriately licenced facility for recycling once they reach capacity.</p> <p>Steel is taken to Infrabuild Recycling (formerly Onesteel) Norton NSW, EPA licence #872 (OneSteel).</p>													
4.3	The tipping floor and compaction unit areas are cleared on a daily basis, where feasible, to ensure that waste is being processed within a manageable timeframe. These procedures also assist with general housekeeping and cleanliness on site.	C	<ol style="list-style-type: none"> 1. Audit interview 2. Site inspection 	<p>It was observed during the site inspection that the waste floor was being regularly cleared, the facility manager confirmed that there are some rare circumstances where it is not cleared daily - however it is generally cleared twice a day.</p>													
4.3.1	Appropriate waste receptacles are provided throughout the site to enable the segregation of recyclables and general waste on site. General waste is processed through the facility and recyclable material is transported off site to an appropriately licenced facility for recycling of material.	C	<ol style="list-style-type: none"> 1. Audit interview 2. Site inspection 	<p>Separate waste bins are provided and were observed on site for waste steel and gas cylinders. These are transported offsite to an appropriately licenced facility for recycling once they reach capacity.</p>													
4.4.1	In accordance with Condition 47(d), an education program has been developed to ensure all drivers accessing the site are inducted in the conditions of site entry. Details regarding this training program are provided in Section 4.2.2 of the OEMP. The induction program is supported by the following measures: <ul style="list-style-type: none"> - Verbal advice from weighbridge operator; - Printed material to be handed to the driver at the weighbridge; - Spot checks by Facility Manager or site personnel); - Tool box meetings; and - Site entry signage. 	C	<ol style="list-style-type: none"> 1. Audit interview 2. Site inspection 	<p>All persons entering the site receive an induction. No printed material was observed at the weighbridge. The weighbridge operator confirmed that they no longer provided printed material to drivers - they undergo an induction and informed of instructions verbally.</p>													
4.4.1.1	The following table outlines the measures to be implemented for any breach of waste acceptance requirements. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th>Offence</th> <th>Action - Veolia employee</th> <th>Action - External driver</th> </tr> </thead> <tbody> <tr> <td>First</td> <td>Verbal warning</td> <td>Verbal warning</td> </tr> <tr> <td>Second</td> <td>Written warning and re-attendance to induction training session</td> <td>Written warning and re-attendance to induction training session</td> </tr> <tr> <td>Third</td> <td>Re-posting to another site or re-employment</td> <td>Refused entry to site for driver</td> </tr> </tbody> </table>	Offence	Action - Veolia employee	Action - External driver	First	Verbal warning	Verbal warning	Second	Written warning and re-attendance to induction training session	Written warning and re-attendance to induction training session	Third	Re-posting to another site or re-employment	Refused entry to site for driver	C	<ol style="list-style-type: none"> 1. Audit Interview 	<p>The Facility Manager confirmed that offence notifications are undertaken through the Veolia sales/customer team and generally with the breaching company not the specific driver.</p>	
Offence	Action - Veolia employee	Action - External driver															
First	Verbal warning	Verbal warning															
Second	Written warning and re-attendance to induction training session	Written warning and re-attendance to induction training session															
Third	Re-posting to another site or re-employment	Refused entry to site for driver															
4.4.3	As part of the site induction requirements, and in addition to operational training requirements, employees are also trained in a range of waste processing related areas including: <ul style="list-style-type: none"> - Waste tracking - Waste classification - Control of non-conforming waste This training ensures that staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste.	C	<ol style="list-style-type: none"> 1. Work Instructions 2. Training records - Waste Management 	<p>All personnel are trained on work instructions that apply to their position. The work instructions for weighbridge and tipping floor operations were sighted during the site inspection</p>													

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4.5.2	Wind blown matter is addressed by using the following controls: <ul style="list-style-type: none"> - All waste is unloaded within the terminal building - Daily litter patrols of the site are conducted by site personnel Results of the litter patrol, including corrective actions taken to ensure wind blown litter does not leave the premises, are recorded on the Weekly Site Inspection Checklist, which forms part of the BMS.	C	1. Audit interview 2. Site inspection	It was confirmed during interviews with site personal that daily litter patrols occur - walk over of site and collect all loose litter. Weekly inspections also address wind blown material A sweeper is contracted to clear the site once a day.																					
5.1	Regular inspections are undertaken by the CTT personnel to ensure that environmental controls have been implemented, meet specification, and are being maintained in accordance with the site Inspection and Testing Program as summarised in Table 5.1 below. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th>Item</th> <th>Type of Inspection / Testing</th> <th>Frequency of Inspection</th> <th>Responsibility</th> </tr> </thead> <tbody> <tr> <td>Weighbridge</td> <td>Certification and / or calibration</td> <td>Annual</td> <td>Plant Maintenance Supervisor</td> </tr> <tr> <td>Compactors 1 & 2</td> <td>Calibration</td> <td>Annual</td> <td>Plant Maintenance Supervisor</td> </tr> <tr> <td>Waste volume monitoring - Storage on site - Annual limit</td> <td>- Inspection (waste on floor) - Tonnage data review</td> <td>Daily</td> <td>Facility Manager, Leading Hand(s)</td> </tr> <tr> <td>Site inspection and housekeeping checks</td> <td>Inspection</td> <td>Weekly</td> <td>Leading Hand or nominated person</td> </tr> </tbody> </table>	Item	Type of Inspection / Testing	Frequency of Inspection	Responsibility	Weighbridge	Certification and / or calibration	Annual	Plant Maintenance Supervisor	Compactors 1 & 2	Calibration	Annual	Plant Maintenance Supervisor	Waste volume monitoring - Storage on site - Annual limit	- Inspection (waste on floor) - Tonnage data review	Daily	Facility Manager, Leading Hand(s)	Site inspection and housekeeping checks	Inspection	Weekly	Leading Hand or nominated person	C	1. Weighbridge records 2. Compactor calibration 3. Waste records 4. Daily and weekly inspection checklists	Records demonstrating conformance with the WMP sighted during the site inspection included: - Weighbridge records - (all specification noted and recorded data available in the PWS Report 5-11/12/22) - Compactor calibration (use check scales to confirm weights match from compactor - only done internally) - Waste records (October 2022) - Daily and weekly inspection checklists	
Item	Type of Inspection / Testing	Frequency of Inspection	Responsibility																						
Weighbridge	Certification and / or calibration	Annual	Plant Maintenance Supervisor																						
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Site inspection and housekeeping checks	Inspection	Weekly	Leading Hand or nominated person																						
Air Quality Management Plan (AQMP)																									
4	Mitigation measures have been incorporated into the design of the CTT facility to minimise the risk and consequences associated with the key air quality management issues. Operational activities are undertaken to comply with relevant regulations and guidelines for the handling of dust and odour, and to ensure emissions are minimised. These are: <ul style="list-style-type: none"> - Handling of the waste: All the waste received at CTT is handled inside the terminal building. - Dust emissions from handling of waste: if required, the deluge system inside the terminal building can be used as a dust suppression system during dust generating activities. - Odour impacts from waste received: a forced air extraction system in the transfer terminal building to capture and disperse odour emissions from the waste handling area 	C	1. Site Inspection	Observations made during the site inspection confirmed that the mitigation measures outlined in the AQMP were implemented on site.																					
4.1.2.1	In accordance with Condition 48(d), procedures for the maintenance and repair of the odour control system mechanisms are detailed in the Operation and Maintenance Manual for the Odour Control System provided in Appendix A.	C	1. Odour Audit XXXIX June 2022 2. Weather Station Service records / report (HS Pty Ltd) 14/10/2022	Maintenance records for the odour control system were verified within the Odour audit report as well as service calibration and maintenance records from external company (Hydrometric Services Pty Ltd)																					
4.1.6	Maintenance schedule for odour control system and ventilation equipment is carried out typically in accordance with the manufacturer's specification and includes monthly mechanical maintenance. Regular inspections are undertaken as per the CTT Environmental Inspection & Testing Schedule, included in Section 5.1.1 of the OEMP.	C	1. Odour Audit XXXIX June 2022 2. Weather Station Service	Maintenance records sighted during the site inspection confirmed that the extraction fans undergo maintenance inspections on a monthly basis. Maintenance records for the odour control system were verified within the Odour audit report as well as service calibration and maintenance records from external company (Hydrometric Services Pty Ltd)																					
4.1.7	All Veolia sites are required to follow a Housekeeping and Inspection Procedure (PRO-257) which requires that a standard checklist be followed to ensure site safety and hazard reduction is maintained. This checklist has been adapted for the CTT in order to manage odour through the implementation of housekeeping procedures (refer to the Weekly Site Inspection Checklist (TEM-5557)) and compactor cleaning procedures.	C	1. Monthly safety and hazard sheet 2. Weekly site inspection Checklists	Monthly safety and hazard sheet and weekly site inspection checklists were sighted during the site inspection.																					
Table 4.1	Visual inspection of the site entry and exit points and use of sweeper on public roads if required; <ul style="list-style-type: none"> - regular cleaning of sealed haul roads including removing litter/spilt material from access roads (sweeper/vacuum cleaner is used) 	C	1. Audit interview 2. Site inspection	The on site sweeper used for dust control was not working at the time of the site inspection, however the Facility Manager confirmed that they have engaged a third party (temporary) to undertake dust control activities once a day until the on site sweeper is repaired																					
Traffic Management Plan (TMP)																									
4.1.1	Entering or exiting the CTT site is via a left turn from the slip lane on Parramatta Road, into the sealed right of carriageway. Arrangements have been made with neighbouring users, in regard to traffic sharing on the right of carriageway. 12.5m rigid waste trucks are not permitted to turn right into the site entrance until intersection upgrade works have been completed to the satisfaction of Cumberland Council and Roads and Maritime Services (RMS). Access to the site from Rawson Street is not allowed.	C	1. Site inspection	When observing a limited number of truck movements exiting site they had made a left hand turns onto Parramatta Road																					
4.1.4	Traffic congestion is mitigated through design and contract delivery windows. However, in the event that congestion does occur onsite, the following actions will be taken to manage any potential traffic impacts on neighbouring businesses: <ul style="list-style-type: none"> - The Facility Manager or Weighbridge Operator will direct the relevant site personnel to assess the scope and/or cause of the congestion. - Vehicles queued beyond the boundary will be organised so as not to obstruct the traffic movements of neighbouring businesses. - When possible, vehicles will be moved onto the areas of the Clyde site pending resolution of the problem. - Should all the above measures fail to relieve congestion or resolve the problem in full causing traffic to bank to the Parramatta Road slip lane, vehicles will be directed away from the site. - In addition, the Site Manager (or nominee) will contact the waste transporter advising them to cease further deliveries to the site until the problem has been resolved. 	C	1. Audit interview	Traffic congestion is adequately managed in site. On site personnel confirmed the process for managing traffic congestion: - where trucks start to bank up in the access driveway, the Sales team are informed - Sales team contact customers to request they delay pick up or they are diverted to other waste facilities Generally traffic backups would only occur if other business have a failure resulting in closure of other facilities																					

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5.1	<p>The measures detailed in Table 5.1 are employed to monitor and record the movement of vehicles accessing the site and adherence to the code of conduct:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Parameter</th> <th>Monitoring Required</th> <th>Frequency</th> <th>Criteria / Performance Manager / Trigger</th> <th>Response</th> </tr> </thead> <tbody> <tr> <td>Onsite Truck Routes</td> <td>Spot Monitoring</td> <td>Periodically</td> <td>Onsite blockages or disturbance</td> <td>Follow up with driver Review of procedures</td> </tr> <tr> <td>Traffic Flow</td> <td>Congestion</td> <td>As Required</td> <td>Complaints Detection</td> <td>Respond according to result See Section 4.1.4</td> </tr> <tr> <td>Driver Management</td> <td>Spot Monitoring</td> <td>Periodically</td> <td>Complaints Detection</td> <td>Review of procedures and operations Follow up with driver</td> </tr> </tbody> </table>	Parameter	Monitoring Required	Frequency	Criteria / Performance Manager / Trigger	Response	Onsite Truck Routes	Spot Monitoring	Periodically	Onsite blockages or disturbance	Follow up with driver Review of procedures	Traffic Flow	Congestion	As Required	Complaints Detection	Respond according to result See Section 4.1.4	Driver Management	Spot Monitoring	Periodically	Complaints Detection	Review of procedures and operations Follow up with driver	C	<ol style="list-style-type: none"> Audit Interview CTV in meeting room 	Cameras are located throughout site and monitoring screens present in the offices (including screens in meeting rooms).	
Parameter	Monitoring Required	Frequency	Criteria / Performance Manager / Trigger	Response																					
Onsite Truck Routes	Spot Monitoring	Periodically	Onsite blockages or disturbance	Follow up with driver Review of procedures																					
Traffic Flow	Congestion	As Required	Complaints Detection	Respond according to result See Section 4.1.4																					
Driver Management	Spot Monitoring	Periodically	Complaints Detection	Review of procedures and operations Follow up with driver																					
Vermin and Pest Control Plan (VPCP)																									
4.1.1	The Facility Manager is responsible for engaging a licensed pest control contractor to assist in carrying out the functions detailed in this plan. In addition to carrying out the pest control	C	<ol style="list-style-type: none"> 2021 Pest Service Reports 	The Facility Manager provided records of licensed pest control contractor engagement during the audit period.																					
4.1.2	<p>Preventative control measures include, but are not limited to:</p> <ul style="list-style-type: none"> - Bird nets and spikes; - Minimising the time waste is spent on the floor of the building; - Quarterly inspection of the site by a registered pest controller; - Good housekeeping practices as detailed in Section 4.1.3; - Placement of rodent bait stations at various locations around the site as follows: <ul style="list-style-type: none"> -- Transfer Terminal; -- Compactor Pit; - Site Administration Office; -- Weighbridge Office. - Training of all staff for recognising potential vector habitats; - Border spraying, for the prevention of cockroaches, silverfish, spiders and ants; - - Cockroach gel in office areas. 	C	<ol style="list-style-type: none"> Site inspection Audit interviews Pest Service Reports Past bait station photos 	<p>Bird nets and spikes sighted.</p> <p>Photo evidence of Bait stations provided</p> <p>Site inspection records and pest service reports were also made available on site.</p>																					
4.1.2	The Weekly Site Inspection Checklist is accessible on Veolia's issue management system, Rivo and is used to check and record the site conditions such as drain blockages, litter, evidence of vermin and pests and checks that any actions undertaken to ensure the mitigation measures mentioned above are being implemented effectively.	C	<ol style="list-style-type: none"> Weekly site inspection checklist 	Weekly site inspections were sighted during the site inspection which included checks for evidence of vermin and pests on site																					
4.1.3.2	The waste floors, dado walls and all loading areas are cleaned regularly, including mechanical sweeping of the building floor following periods of high traffic volumes. All overhead structures and internal roofs are also inspected daily to ensure they are kept clean.	C	<ol style="list-style-type: none"> Audit interview Site inspection 	<p>Daily checks are undertaken which includes a check for waste floors, loading areas and internal roofs. The Facility Manager confirmed (and it was sighted) that the bucket on the dozer has a rubber blade which the Operator uses as a squeegee to move waste off floor.</p> <p>The walls are steel, and waste is generally not up against the walls and the shed is cleared every day, therefore they don't get "cleaned regularly" as its not required.</p>																					
4.1.3.2	The CTT also includes other enhanced pest management controls, including nets and an Electric Bird Deterrent System (Avishock) installed early in 2019. Observations made during the 2019 IEA found that these controls were effective in reducing the presence of birds (particularly ibis) in the CTT.	C	<ol style="list-style-type: none"> Audit interview Site inspection 	Bird nets and spikes were observed on site. Avishock system is in place - solar powered not very effective. Due to be checked (solar component).																					
4.1.4	The pest controller is required to use approved chemicals only. A list of chemicals proposed and Safety Data Sheet (SDS) for each are submitted and approved prior to use by the contractor.	C	<ol style="list-style-type: none"> Chemical SDS Audit interview 	The facility manager provided a list of chemicals used by the pest controller and also produced copies of the SDS. It was also confirmed that Veolia use chemicalert to stay up to date with appropriate SDS																					
5.2	<p>Following each quarterly site inspection, the pest controller reports the following details to the Facility Manager:</p> <ul style="list-style-type: none"> - The level of pest activity noted during inspection; - Actions as part of routine schedule; and - Actions in response to problems noted. <p>As a minimum requirement, all reports include the company name and address, the pest control license number, the date and the areas inspected and areas where action was taken. From time to time, the pest controller may be requested to carry out further investigations. The results of these investigations will be provided in report form.</p>	C	<ol style="list-style-type: none"> 2021 Pest Service Report 	Reports from the licensed pest control contractor were observed during the site inspection.																					
Stormwater Management Plan (SMP)																									
4.1	Stormwater runoff from the container yard, apron and car park is diverted to a large first flush system. After 10mm of rain, the runoff will then divert into Duck River.	C	<ol style="list-style-type: none"> Site inspection Stormwater Management Plan (MAN-14636-1) July 2022 	The site inspection confirmed conformance with the SMP.																					
4.1	Stormwater runoff from the southern rail line and waste shed roof are diverted to Pond 2 and is treated in an oil/silt separator (humeceptor) located at the North Western side of the CTT's office and amenity buildings prior to discharging into Duck River. Stormwater captured from the roof of the transfer and office/amenity buildings, classified as "clean", is directed straight to the stormwater retention pond or the rainwater tank for reuse on site.	C	<ol style="list-style-type: none"> Site inspection Stormwater Management Plan (MAN-14636-1) July 2022 	The site inspection confirmed conformance with the SMP.																					
4.1	Stormwater from the hot load area (refer to Appendix A) passes through the oil/water separator under normal operation. When a hot load is disposed of in the area, the firewater is collected and stored in a dedicated underground tank.	C	<ol style="list-style-type: none"> Site inspection Stormwater Management Plan (MAN-14636-1) July 2022 	The site inspection confirmed conformance with the SMP.																					
4.1.1	The CTT building floor has been designed so that any water that may come into contact with the waste is directed to the leachate sump, for collection and treatment at an appropriate disposal facility or disposal at Woodlawn.	C	<ol style="list-style-type: none"> Site inspection Stormwater Management Plan (MAN-14636-1) July 2022 	The site inspection confirmed conformance with the SMP.																					

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4.2	Leachate, as described above, is disposed of in accordance with regulatory requirements. That is, leachate is either pumped into a dedicated ISO tanker that is transported by rail to the Woodlawn Eco Precinct or into road tankers and transported to an appropriately licenced facility.	C	1. Waste Records - Outgoing	Leachate is temporarily not being taken to Woodlawn (currently at capacity). Leachate is currently being pumped out and taken offsite by an appropriately licensed transporter. Site personnel confirmed that this is a temporary measure as Woodlawn is currently at capacity. Once Woodlawn has additional capacity (currently undergoing design/construction) leachate will be transported to Woodlawn. Leachate receipts sighted. Leachate taken to Enviro Waste Management Group (Yennora, NSW) EPA licence #20444																					
4.3	A self-bunded diesel storage tank is also located at the CTT. All refuelling takes place in close proximity to the tank. The pump has an automatic cut off in case of hose failure and spill control materials are available in plentiful supply in the area.	C	1. Leachate receipts	During the site inspection it was confirmed: - Diesel tank is self bunded - Diesel pump included an auto cut off - Sufficient spill control equipment was available adjacent to the refuelling area																					
4.3	Hot Loads, defined as a waste collection vehicle where it is identified or the driver suspects fire on-board, are tipped in a separate area away from other waste and where the fire services have easy access. The area at the CTT site marked "Hot Load" has a separate storage tank so that any water used to douse a smoulder/fire can be transported to a licensed facility. Refer to the Hot Load Management Work Instruction (WIS-5541).	C	1. Audit interview 2. Site inspection	It was confirmed during the site inspection and through audit interviews that there is a specific area for hot loads which is clearly signed. The hot load area has a separate storage tank for all waste water. This water is pumped out of the tank and taken offsite to a licensed facility.																					
5.1	If required, monitoring of surface water will be undertaken and assessed against the following discharge quality limits. <table border="1" style="width: 100%; border-collapse: collapse;"> <caption>Table 5.1 Stormwater Runoff Discharge Requirements</caption> <thead> <tr> <th>Parameter</th> <th>Frequency</th> <th>Standard</th> <th>Criteria / Performance Measure / Trigger</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>As required, or following a significant rainfall event (>100mm)</td> <td>The Australian Water Quality Guidelines for Fresh and Marine Waters (ANZECC, 2000)</td> <td>6.5 to 8.5</td> </tr> <tr> <td>Suspended solids</td> <td></td> <td></td> <td>No greater than 50mg/L</td> </tr> <tr> <td>Oils and grease</td> <td></td> <td></td> <td>No visible films or odour</td> </tr> <tr> <td>Litter</td> <td></td> <td></td> <td>No visible litter washed (or blown) from the site</td> </tr> </tbody> </table>	Parameter	Frequency	Standard	Criteria / Performance Measure / Trigger	pH	As required, or following a significant rainfall event (>100mm)	The Australian Water Quality Guidelines for Fresh and Marine Waters (ANZECC, 2000)	6.5 to 8.5	Suspended solids			No greater than 50mg/L	Oils and grease			No visible films or odour	Litter			No visible litter washed (or blown) from the site	C	1. Site inspection 2. Calibration records 3. May 2021 water quality monitoring results	Site personnel confirmed that they proactively undertake monitoring for due diligence purposes. Most recent monitoring events occurred in February and October 2022 (results sighted). Samples are sent to ALS (NATA accredited lab) and results are reviewed to check compliance. Monitoring results are only reportable if exceed limits as per this condition. If there are exceedances, it triggers the implementation of the Exceedance/Non-Compliance Work Instructions (sighted)	
Parameter	Frequency	Standard	Criteria / Performance Measure / Trigger																						
pH	As required, or following a significant rainfall event (>100mm)	The Australian Water Quality Guidelines for Fresh and Marine Waters (ANZECC, 2000)	6.5 to 8.5																						
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5.1.1	Inspection of the stormwater treatment system is carried out on a regular basis and after significant rainfall events. Debris is removed when identified by inspection, or on a programmed basis. Any material accumulated within the retention basin or the silt/oil chamber is removed manually or by high suction vacuuming and disposed of in an approved manner.	C	1. Site Inspection 2. Weekly inspection checklist	The stormwater treatment system was sighted during the site inspection and appeared to be well maintained. A new automatic gate system had been installed.																					
5.1.1	Checking and cleaning out the treatment system, as well as inspections for the pumps and retention pond are part of the stormwater maintenance procedure for the CTT. Other stormwater maintenance involves visually inspecting pits and drainage points as part of the Weekly Site Inspection Checklist. Cleaning out of the humeceptor and inspection of culverts for obstructions are undertaken on a biannual basis, or as required.	C	1. Weekly inspection checklist 2. Humeceptor maintenance records	Weekly inspection checklists include a section for the inspection of the stormwater treatment system. Humeceptor maintenance records were sighted during the site inspection.																					
Site Contamination Management Plan (SCMP)																									
4.1.1	Records of material taken off site are to be filed, stored and archived in accordance with the relevant document control procedures found on Veolia's Business Management System (BMS). Copies of invoiced weighbridge dockets from waste transported off site are to be filed and provided to the Facility Manager. The following information in relation to the storage, treatment and disposal of waste is recorded in accordance with EPA requirements: - Amount and type of waste transported; - Name and licence plate number of the transporter; - Date of transportation; and - Name and location of the receiving waste facility.	C	1. Weighbridge Records 2. PWS Report	Weighbridge records all specification noted and recorded data available in the PWS Report 5-11/12/22 (sighted)																					
4.1.2	For the duration of the operations undertaken at the CTT, the site will be sealed, unless upgrade works are required to the existing hardstand or any other excavation, thereby minimising the potential for disturbing the soils. If future works are to be undertaken involving disturbing the ground, mitigation measures as outlined in the Construction SCMP provided in Appendix B will be implemented.	C	1. Site Inspection 2. Work Order - bitumen maintenance request	The site was observed to be sealed and in good repair. Records of previous maintenance requests (Work orders) for bitumen repair were sighted.																					
Noise Management Plan (NMP)																									
4.1	Trucks enter and exit the site in a forward direction, eliminating the need for reversing alarms outside the terminal building.	C	1. Site Inspection	All trucks observed entering and exiting the site were in a forward manner.																					
4.1	All noise associated with the unloading and compaction of the waste is generated in the building and compaction pits, which acts as additional noise attenuation.	C	1. Site Inspection	All waste unloading and compaction was observed to occur in the terminal building																					
4.1	A permanent noise barrier on the south-western Terminal boundary minimises noise emissions at the nearest sensitive receivers.	C	1. Site Inspection	The noise barrier was sighted during the site inspection.																					
4.1.1	As part of the ongoing maintenance program, the surface of the existing hardstand is inspected on a regular basis. Any areas found to be in need of maintenance works, will undergo further resurfacing works with appropriate construction materials such as asphalt to minimise noise impacts or further deterioration. The most appropriate material will be determined at the time of resurfacing.	C	1. Site Inspection	It was confirmed during the site inspection and interviews with site personnel that the waste terminal floor is regularly inspected for integrity. The container yard and driveways are also regularly inspected which was demonstrated through observing a number of reports for maintenance requests for potholes in RIVO.																					

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4.1.2	Container handling at the CTT is managed to minimise the extent of container movements, thereby minimising the resulting noise emissions from these operations. This protocol aims to provide the most practical and effective means of managing containers in relation to noise impacts. This container management protocol is as follows: <ul style="list-style-type: none"> - Minimising the movement of containers on the hardstand area between containerisation of waste and loading of waste onto trains; - Minimising forklift engine idling noise (particularly during evening and night periods) by switching off engine or parking in a well shielded position such as adjacent to the compactors; - Minimising forklift movements when unloaded, i.e. forklift never travels empty policy; - Ensuring the majority of movements involving the transfer of containers to and from ground stacks are during day-time periods; - Loading containers directly from the compaction area onto rail wagons whenever there is a train in the siding; - Stacking containers in areas adjacent to rail sidings to reduce the distance between the stacking location and rail sidings; - Utilising to its maximum efficiency the space available for storage of containers and minimising excess container movement through double handling; and, - Designating container stacking areas to ensure the required clearance for forklift manoeuvring from any structures. 	C	1. Site Inspection 2. IEA interviews	It was confirmed during the site inspection that container handling is managed in accordance with the NMP.																					
4.1.3	Measures for forklifts involve a sound reduction package, which includes variable frequency reversing alarms, silencers on exhausts, and sound rated engine covers.	C	1. Site Inspection	During the site inspection, forklifts were confirmed to have squawkers for reversing																					
4.2.1	For forklift operators, this program involves training in practices such as throttle control, techniques to minimise impacts during grappling and container set down, and use of "real time" noise feedback systems where feasible. This approach has been found to greatly assist operators in minimising emissions from certain types of plant and equipment. Specifications for plant and equipment used for rail operations have consideration for minimising the noise generated by these activities. In addition, the receiving rail siding, Crisps Creek Intermodal Facility (IMF) has noise restrictions on its rail operation which limits the locomotives that can be utilised for this operation to quieter classes. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Parameter</th> <th>Frequency</th> <th>Standard</th> <th>Criteria / Performance Measure / Trigger</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>As required, or following a significant rainfall event (>100mm)</td> <td>The Australian Water Quality</td> <td>6.5 to 8.5</td> </tr> <tr> <td>Suspended solids</td> <td></td> <td>Guidelines for Fresh and Marine Waters (ANZECC, 2000)</td> <td>No greater than 50mg/L</td> </tr> <tr> <td>Oils and grease</td> <td></td> <td></td> <td>No visible films or odour</td> </tr> <tr> <td>Litter</td> <td></td> <td></td> <td>No visible litter washed (or blown) from the site</td> </tr> </tbody> </table>	Parameter	Frequency	Standard	Criteria / Performance Measure / Trigger	pH	As required, or following a significant rainfall event (>100mm)	The Australian Water Quality	6.5 to 8.5	Suspended solids		Guidelines for Fresh and Marine Waters (ANZECC, 2000)	No greater than 50mg/L	Oils and grease			No visible films or odour	Litter			No visible litter washed (or blown) from the site	C	1. Clyde Truck Noise Monitoring - Report 16 2. IEA interviews 3. Site inspection	No non-conformance with this this requirement was observed during the site inspection and noise emissions did not appear to cause a nuisance. Site personnel confirmed that there had been no noise complaints received. Truck Noise monitoring records confirmed that all machinery was operating in accordance with this condition for the audit period.	
Parameter	Frequency	Standard	Criteria / Performance Measure / Trigger																						
pH	As required, or following a significant rainfall event (>100mm)	The Australian Water Quality	6.5 to 8.5																						
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4.2.3	Ongoing maintenance of all operational tracks is essential to ensure the tracks are in good working order and repair. If, as part of the ongoing maintenance program, the tracks were found to be in need of maintenance works, repairs would be undertaken as required.	C	1. IEA Interview 2. Noise Management Plan Rev 0.5	Maintenance of the tracks is beyond the operational control of Veolia. The recommendation from the 2021 IEA to remove the requirement for Veolia to have any responsibility for assets that are under the operational control of other organisations has been actioned.	CTT-MP-OFI-02																				
5.1.2	All acoustic instrumentation employed throughout the monitoring program, where required, are to comply with the specifications of AS/IEC 61672.2-2004, "Electro acoustics - Sound Level Meters" and carry a current NATA or manufacturer calibration certificate. All instrumentation is programmed to record continuous statistical noise level metrics in 15 minute intervals, which may include the LAmax, LA1, LA10, LA90, and the LAeq.	C	1. Clyde Truck Noise Monitoring - Report 16 2. Air Met Certificate of Calibration (sound level meter) 4/10/222	Calibration records for the sound level meter is included in the truck noise monitoring report. Calibration certificates for the noise level meter were received confirming compliance with these requirements.																					
5.2	A register, compiled of trucks exceeding the noise limits, provides a further system of reporting put in place by Veolia to improve noise management at the CTT. Identifying trucks exceeding the noise limits, both owned and/or operated by Veolia or external contractors, allows Veolia to set out a method of rectifying non conforming vehicles. Initial verbal and written communication is employed to request operators to repair defects before exclusion from the premises as a final stage.	C	1. Clyde Truck Noise Monitoring - Report 16 2. CTT - Environmental Monitoring Exceedance/Non-Compliance Work Instruction (26/6/2021)	Interviews with site personnel and a review of the truck noise monitoring report 16 confirmed that no exceedances had occurred during the audit period. Site personnel described the exceedance process and navigated through RIVO to demonstrate an understanding of the system.																					
Environmental Monitoring Program (EMP)																									
2	Review the monitoring schedule and seek evidence of completed.	C	1. Monitoring records 2. Operational Environmental Management Plan (MAN-14631-1) Rev.3 (30 July 2021)	A recommendation from the 2021 IEA identified that the OEMP did not include the surface water monitoring program implemented at the CTT. A review of the OEMP confirms that stormwater management is now included.																					
Emergency Response Plan (ERP)																									
4.1	Hard copies of the ERP are available in the Terminal's site and weighbridge offices, which is communicated to all relevant site workers during training in the requirements of the ERP.	C	1. Emergency Response Plan 2021 2. Site inspection	A copy of the ERP was sighted at the weighbridge and at the front of the site office.																					
4.2	The ERP will as a minimum be tested annually in accordance with the Emergency Response Procedure and requirements of the PIRMP Guidelines. The ERP must also be tested within one month of any pollution incident occurring. Records of any testing conducted will be maintained. The Incident/Emergency/Crisis Log Template can be used and the corrective actions logged in Rivo as an ad hoc inspection.	C	1. October 2021 drill	A drill to test the hot load procedures, ERP, spill response and the pollution incident response Management Plan (PIRMP) was undertaken on 8/12/2022 to confirm the adequacy of the plans and the implementation of the plans. Learning and actions from the drills is disseminated to staff through the debrief note and toolbox meeting as required. A copy of the emergency drill debrief was sighted during the sit inspection and audit interviews.																					
4.3.1	The ERP will as a minimum be reviewed or at least annually, and amended as required when any of the following occurs: <ul style="list-style-type: none"> - Significant operational changes (e.g. addition of new processes to a work area which introduce new potential emergency situations); - Significant new emergency risks identified; and - On completion of an emergency response. This will ensure the relevance, accuracy and effectiveness of the information provided.	C	1. Emergency Response Plan 2021	A review of the ERP confirmed that the requirements of this condition are outlined in section 4.3.																					
4.3.2	After an emergency where the ERP is activated, the manager/supervisor shall ensure the incident is entered in RIVO and coordinate an emergency response plan review involving key personnel from the site and other stakeholder groups involved in the management of the emergency. The Emergency Response Plan Use Review shall be completed, and where opportunities for improvement or required changes are identified, corrective actions shall be documented, entered in RIVO and the ERP updated to reflect changes.	NT	N/A	The ERP was not required to be activated within the audit period.																					



Project name: 2022 Independent Environmental Audit - Clyde Waste Transfer Terminal

APPENDIX E SITE INSPECTION PHOTOS

CONTACT US

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