





Annual Environmental Management Report - Camellia Materials Recycling Facility 2021-2022



Name of operation	Camellia Materials Recycling Facility
Name of operator	Veolia Environmental Services (Australia) Pty Ltd
Development consent / project approval #	SSD 4964
Name of holder of development consent / project approval	Veolia Environmental Services (Australia) Pty Ltd
Mining lease #	N/A
Name of holder of mining lease	N/A
Water licence #	N/A
Name of holder of the water licence	N/A
MOP/RMP start date	N/A
MOP/RMP end date	N/A
Annual Review start date	6 July 2021
Annual Review end date	5 July 2022
<p>I, Anaé Ressos, certify that this audit report is a true and accurate record of the compliance status of Camellia Materials Recycling Facility for the period 2021-2022 and that I am authorised to make this statement on behalf of Veolia.</p> <p>Note:</p> <p>a) <i>The Annual Review is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p>b) <i>The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
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Terms and Definitions

Term	Definition
AEMR	Annual Environmental Management Report
BMS	Veolia's Business Management Systems
CEMP	Construction Environment Management Plan
DA	Development Application
DPE	Department of Planning and the Environment
EIS	Environmental Impact Statement
EP&A	Environmental Planning and Assessment (Act and Regulations)
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
IEA	Independent Environmental Audit
LTEMP	Long Term Environmental Management Plan
SAR	Site Audit Report
SAS	Site Audit Statement
The Consent	Development Consent SSD 4964
Veolia	Veolia Australia and New Zealand

Executive Summary

This Annual Environmental Management Report (AEMR) 2021-2022 is the fourth report prepared to detail the environmental performance of the site located at 37 Grand Avenue, Camellia, NSW (the Site). The AEMR covers the period of 6 July 2021 to 5 July 2022 (2021-2022 reporting period).

The Department of Planning and the Environment (DPE) granted Development Consent SSD 4964 (the Consent) on 6 July 2016 for the development of a Material Recycling Facility (MRF) at the Site. The Consent comprises conditions (the Consent Conditions) stipulating requirements for construction and operational phases. Veolia Australia and New Zealand (Veolia) has prepared this AEMR in accordance with Consent Condition 11, as well as relevant legislative requirements.

This AEMR includes a review of monitoring results, in relation to the environmental performance of the Site against relevant performance measures and statutory requirements, as well as records of any complaints. No construction activities were carried out at the Site during this reporting period.

An Independent Environmental Audit (IEA) was commissioned in May 2021 in accordance with Condition C9 of the Consent, to assess the environmental performance of the Site for the period 6 July 2018 to 5 July 2021. The IEA report was not able to be finalised as the auditors were not able to complete the site verification component of the audit due to NSW Government COVID-19 restrictions within Greater Sydney. An extension to submit the IEA report was requested and successfully granted by DPE. The IEA recorded no non-compliances with the Consent identified during the 2018-2021 reporting period. The IEA report was submitted to DPE on 26th November 2021.

Section 1 - Introduction

1.1 Site Background

The Site is located at 37 Grand Avenue, Camellia, NSW. Refer to Appendix A for Site Location Plan. Veolia leases the Site and has been undertaking activities to render it suitable for commercial / industrial land use. The Consent permits the development of a Materials Recycling Facility (MRF).

The proposed development will involve the construction and operation of a MRF to house a multi stage processing system in a new enclosed building, including a combination of equipment designed to separate incoming waste and extract recyclable material for transfer to secondary markets. The MRF will be capable of processing up to 200,000 tonnes per annum of general solid (non-putrescible) waste received from the commercial and industrial sector. There is also the potential to allow for a refuse derived fuel stream for energy recovery.

The development of MRF comprises of three stages:

1. Stage 1 - Preloading of the Site
2. Stage 2 - Construction of the MRF
3. Stage 3 - Operation of the MRF

Stage 1 – Preloading of the site with engineered fill material was completed in the previous reporting period during which consolidation of the site was achieved.

Following the completion of Stage 1 works, Veolia sought approval from DPE to undertake further works under a Stage 1A approval which involved levelling, grading and placing a two coat seal over the site to improve water management. A Construction Environment Management Plan (CEMP) was prepared for Stage 1A works to describe controls for construction activities, which was approved by DPE on 16 January 2020.

The Site attained a Site Audit Report (SAR) and a Site Audit Statement (SAS) in December 2021, in accordance with Condition A16 of the Consent, which deemed the Site suitable for its intended uses (refer to Table 1.2).

During this reporting period, Veolia personnel were responsible for ensuring environmental controls and mitigation measures were effectively maintained on-site. To validate this, site inspections were undertaken and recorded. The completed inspections provided a means to evaluate and verify compliance with the relevant regulatory requirements.

No non-compliances were identified during site inspections undertaken by Veolia in this reporting period. In the event a non-compliance were identified during site inspections or

through monitoring results, an investigation would be carried out to determine the cause and to ascertain the necessary corrective actions.

1.2 Legislative Requirements

The main legislative instruments governing the environmental performance and activities undertaken at the Site include the EP&A Act regulated by the DPE, and the *Protection of the Environment Operations Act 1997* (the POEO Act) regulated by the NSW Environment Protection Authority (EPA), as well as their respective associated regulations. Those relevant to the preparation of this AEMR are provided in Table 1.2 below.

In addition to the Consent, Environment Protection Licence 4806, issued by the EPA, also regulates the construction activities to be conducted at the Site.

Table 1.2 - Consent Condition for the preparation of this AEMR

Relevant Condition	Requirement
<i>PART A - ADMINISTRATIVE CONDITIONS</i>	
<i>Site Audit Statement</i>	
A16	Prior to the issue of a Final Occupation Certificate for the Development, the Applicant shall obtain from a Site Auditor, a Site Audit Statement and a Site Audit Report which demonstrates that the site is suitable for its intended use(s).
<i>PART C - ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</i>	
<i>Annual Review</i>	
C11	<p>Within 1 year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development. This review must:</p> <ul style="list-style-type: none"> (a) describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year; (b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of the results against the: <ul style="list-style-type: none"> i. the relevant statutory requirements, limits or performance measures/criteria; ii. requirements of any plan or program required under this consent; iii. the monitoring results of previous years; and iv. the relevant predictions in the EIS; (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the Development; (e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.

1.3 Responsibilities

- During the reporting period environmental inspections were undertaken by Veolia NSW Resource Recovery technical support personnel – Mary Wong (Environmental Officer) and Anae Ressos (Environmental Coordinator).
- Jackson Environment and Planning conducted an IEA in July 2021. The audit team associated with this IEA included Alan Parsons (Lead Auditor), Mark Jackson and Rylan Loemker, approved by the DPE in accordance with Consent Condition C9.

Section 2 - Environmental Monitoring & Management

2.1 Monitoring Requirements

The following sections detail the monitoring undertaken throughout the reporting period in accordance with the requirements of the Consent.

The Environmental Monitoring Program within the CEMP for Stage 1A construction activities provides details on all monitoring requirements for the Consent to measure and assess the effectiveness of on-site environmental management measures implemented when construction activities are undertaken on site.

Table 2.1 Construction Monitoring Requirements

Condition Ref	Type of Monitoring	Frequency	Commentary
Part B, Condition B18	Traffic Spot Monitoring	As required	Not triggered - No construction traffic on site in this reporting period
CEMP	Visual Dust Monitoring	As required	Not triggered - No construction activities on site in this reporting period
Part B, Condition B24	Noise Monitoring	At the commencement of the project, followed by as required	Background noise monitoring completed July 2017 No complaints related to noise received in this reporting period to trigger additional monitoring
Part B, Condition B26	Vibration Monitoring	As required	Not triggered - No construction activities on site in this reporting period

Water Management Plan (Consult.In, 2019) (WMP, appended to the CEMP)	Inspection of the Water Management System (including Sediment and Erosion Controls)	Monthly and following rainfall events of equal to or greater than the 20% Annual Exceedance Probability event	Ongoing basis
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Monitoring as specified in the Long Term Environmental Management Plan (LTEMP) (Zoic report dated 17 December 2021) is listed in Table 2.2 below.

Table 2.2 LTEMP Monitoring Requirements

Type of Monitoring	Frequency	Commentary
Site inspection	Monthly	Ongoing basis
Groundwater Level Monitoring	Contingency Action Only	Not triggered - to be considered in the event that Seep Monitoring and Sampling indicates results inconsistent with those outlined in the Geosyntec (2021) Final Validation Report
Annual Seep Monitoring	Annually (initially for 5 years), 4 hours after high tide and after >20mm of rain where possible.	Seep monitoring completed 30 June 2022
Surface Water Monitoring	Contingency Action Only	Not triggered - to be considered in the event that Seep Monitoring and Sampling indicates results inconsistent with those outlined in the Geosyntec (2021) Final Validation Report

2.1.1 Meteorology

Monitoring meteorological data during this reporting period provided an understanding of the ambient air quality and rainfall conditions at the Site, which was utilised to manage environmental performance, as well as investigate potential impact to nearby sensitive receivers.

Meteorological data is downloaded from the public weather station situated at the Bureau of Meteorology (BoM) Parramatta North (Masons Drive) (Station ID: 066124), recorded at 15 minute intervals. During the reporting period, meteorological conditions such as wind speed, wind direction and rainfall were monitored on an ongoing basis and/or in the event a noise or dust complaint was received.

A summary of daily wind speeds and wind directions at 9am at the nearby BoM weather station is presented in Figure 2.1 and Figure 2.2. During the reporting period, the 9am prevailing wind directions were west, north westerly and south westerly and the wind speeds were most frequently between 0 - 9 m/s.

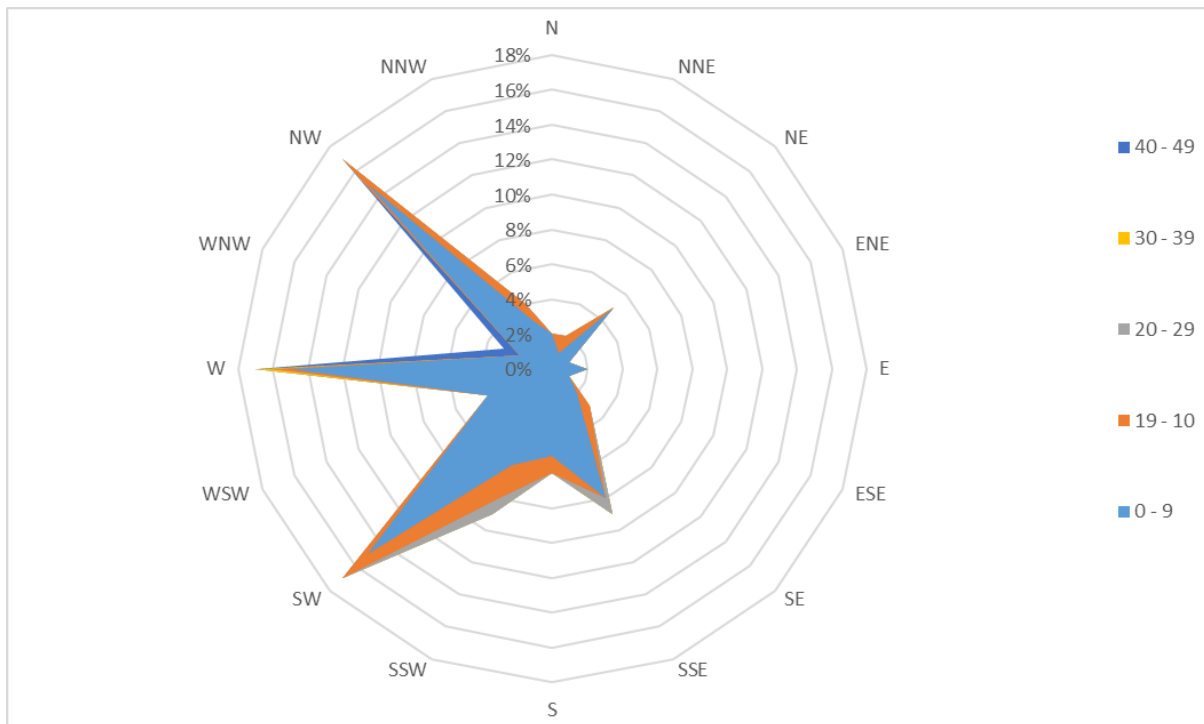


Figure 2.1 Distribution of 9AM wind speed and direction data during the reporting period

Ongoing rainfall data was monitored to supplement stormwater system operation and discharge, as well as for general housekeeping management such as inspection and maintenance of sediment and erosion control measures.

A summary of rainfall data at the Site during the reporting period is presented in Figure 2.2. Overall, the average rainfall for the Site during the reporting period was approximately 152mm per month. Significant rainfall (554.2mm in total) was observed during March 2022.

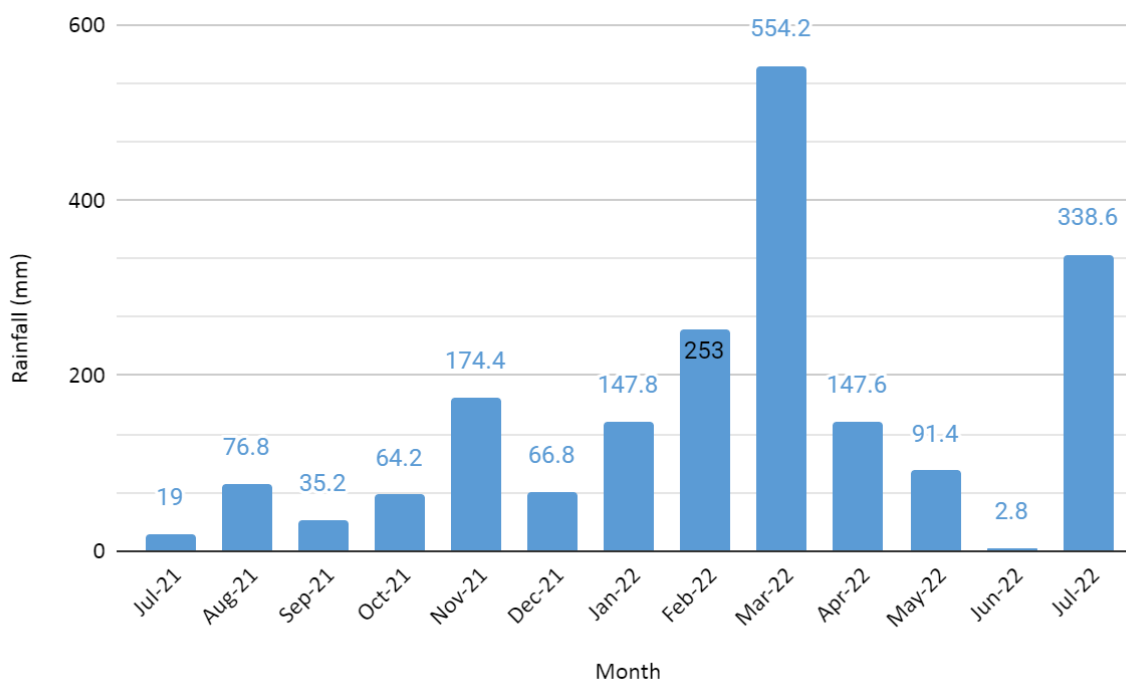


Figure 2.2 Monthly rainfall data during the reporting period

2.2 Air Quality

Following the completion of Stage 1A works, no activities were conducted at the Site which had the potential to impact ambient air quality, therefore no air quality monitoring was carried out during this reporting period. Further details on the key air quality aspects are provided in the following sections.

2.2.1 Dust

Following the completion of Stage 1A works, and the site being sealed, dust generation is no longer a potential issue. Therefore daily site inspections were reduced to monthly checks.

No dust complaints were received during the reporting period.

2.2.2 Exhaust Emissions

There were generally no heavy vehicles present on the site during the reporting period, therefore exhaust emissions were not considered a potential issue.

No complaints relating to exhaust emissions were received during the reporting period.

2.3 Noise and Vibration

There were generally no heavy vehicles present on the site during the reporting period therefore noise and vibration emissions were not considered a potential issue.

No complaints relating to noise and vibration were received during the reporting period.

2.4 Surface Water

Stage 1A works included the installation of a new stormwater system and grading of the site to work predominantly as overland and channel flow, which was completed in June 2020. In accordance with the monitoring requirements in the WMP (refer to Table 2.1), visual monitoring of the key components of the new stormwater management system have been done on a routine basis, including inspections of the cap and the new stormwater pits and swales.

No issues related to stormwater management were noted during this reporting period.

2.5 Traffic

There were generally no heavy vehicles present on the site during the reporting period therefore traffic impacts were not considered a potential issue.

No traffic congestion complaints were received during the reporting period.

2.6 Soil

In accordance with Consent Condition B15, all fill material used for preloading of the site was classified as Virgin Excavated Natural Material (VENM). The imported fill material was sourced from WestConnex stage 1B tunnel spoil and applied under the WestConnex Stage 1B Tunnel Spoil Exemption 2016 issued by the EPA.

During the previous reporting period, the fill was shaped to meet design levels and capped with a two coat seal. No material has been excavated or imported onto the Site since capping works were completed.

Following the completion of these works, visual monitoring of the key sediment control measures have been done on a routine basis, including inspections of the cap and the bioretention swales.

No measures were identified to be breached during this reporting period.

2.8 Heritage

No excavation works were conducted therefore items of indigenous or European heritage were not encountered during the reporting period.

2.9 Pest and Vermin noxious weeds

During the reporting period, visual inspections for pests and vermin were undertaken at the Site. For this AEMR period, no pest and vermin management issues were reported.

Weed management was undertaken in the reporting period as part of the site maintenance works, including clearing of vegetation to minimise weed re-establishment and invasions.

2.10 Complaints

Following the receipt of a complaint:

1. Any complaints, queries and issues received regarding noise, dust or other general community disturbances are documented individually in the Site's Complaints Register
2. Meteorological wind data is downloaded from the BoM website
3. All complaints are investigated and details recorded and actioned as per Veolia's incident management processes
4. The Site Manager or nominee communicates any corrective actions taken on the site with the complainant

No complaints were received by the Site during this reporting period.

2.11 Additional Monitoring

Annual monitoring and sampling of the foreshore seeps was undertaken along the northern boundary of the Site on 30 June 2022 by Geosyntec Senior Hydrogeologist Joshua Lloyd as part of the seep validation in accordance with the Zoic (2021) LTEMP.

Visual colour techniques are used to determine the concentration of Chromium VI. The purpose of this sampling is to demonstrate that contaminant max flux (CMF) of Chromium VI into the Parramatta River remains consistent with the findings of the Final Validation Report prepared by Geosyntec (2021).

Annual seeps monitoring will continue for an additional 5 years and a monitoring summary report will be prepared at the completion of the 5 year period (2027).

Section 3 - Environmental Performance

The environmental performance of the Site is assessed through the results of environmental monitoring, internal inspections, as well as external and internal environmental audits.

3.1 Independent Environmental Audit

An IEA of the Site's environmental performance was carried out in July - November 2021 by Jackson Environment and Planning Pty Ltd. The objective of this IEA was to assess the environmental performance of the Site and identify any non-compliances against environmental approvals issued for the Site, as required by Consent Condition C9. The IEA found no non-compliances in the 2018 - 2021 audit period.

3.2 IEA Findings

No non-compliances have been identified against the Consent Conditions during the 2018-2021 IEA reporting period. Management systems and environmental performance of the development are considered to be adequate for this stage of development.

3.3 Future Planned Works

In accordance with the CEMP, Veolia will continue to conduct site inspections and maintenance activities over the next year.

3.4 Conclusion

A review of the environmental performance of the Site during the last reporting period determined the Site was managed in accordance with the Consent and CEMP. Veolia will continue to monitor and assess the Site's environmental performance through to the next reporting period.

References

1. CH2M HILL (2013) Camellia Recycling Centre: Environmental Assessment. CH2M HILL Australia Pty Ltd. February 2013.
2. Consult.In (2016) Camellia MRF - Water Management Plan. Consult.In Pty Ltd. December 2016
3. EPA (2006). Assessing Vibration: Technical Guideline. NSW Environmental Protection Authority. February 2006.
4. EPA (2014d), NSW EPA The Recovered Aggregate Exemption 2014.
5. EPA (2020), The Guideline: Pollution Incident Response Management Plans (PIRMP Guideline)
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7. Veolia (2019) Construction Environment Management Plan (CEMP) - Preloading Stage 1A. Veolia Australia and New Zealand. December 2019
8. Zoic (2021) Long Term Environmental Management Plan (LTEMP) Geosyntec Consultants Pty Ltd. December 2021

Appendices

Appendix A - Site Plan



Antoine St

NRG Automotive Repairs



Jean St

P

Comm

Circular Quay - Parzanette

F

Cyclisme - Grand Am

Concrete Recyclers

Veolia Environmental Services

Grand Ave

SAMI Bitumen Technologies

Grand Ave

Hylix Concre