



SUEZ Advanced Waste Treatment Facility | Part 3A

INDEPENDENT ENVIRONMENTAL AUDIT

Prepared for SUEZ Recycling & Recovery Pty Ltd | 3 December 2020



SUEZ Advanced Waste Treatment Facility

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PR146

Prepared by		Reviewed by
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Company	Element Environment	Element Environment
Position	Associate	Director
Project Role	Lead Auditor	Technical Reviewer
Signature		
Date	3 December 2020	3 December 2020

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DOCUMENT CONTROL


Revision	Date	Description	Prepared by	Reviewed by
0	20 November 2020	For Suez review	Element Environment	SUEZ Recycling & Recovery Pty Ltd
1	3 December 2020	For submission to DPIE	Element Environment	SUEZ Recycling & Recovery Pty Ltd

Audit declaration

Project name	SUEZ Advanced Waste Treatment Facility
Consent number	MP06_0185
Description of project	Construct and operate an advanced waste technology facility to receive up to 120,000 tonnes of mixed solid waste and 14,400 tonnes of biosolids a year and produce up to 40,000 tonnes compost a year that would be suitable for a range of uses, including the rehabilitation of the Kemps Creek Landfill. All residual waste would be landfilled or disposed of at a suitably licensed facility.
Project address	1725 Elizabeth Drive, Kemps Creek
Proponent	SUEZ Recycling & Recovery Pty Ltd
Title of audit	SUEZ Advanced Waste Treatment Facility Independent Environment Audit

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

1. The audit has been undertaken in accordance with relevant condition(s) of consent;
2. The findings of the audit are reported truthfully, accurately and completely;
3. I have exercised due diligence and professional judgement in conducting the audit;
4. I have acted professionally, objectively and in an unbiased manner;
5. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
6. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
7. Neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
8. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Name of Auditor	Darren Green
Signature	
Company	Element Environment Pty Ltd
Date	3 December 2020

Contents

EXECUTIVE SUMMARY	VII
1 INTRODUCTION	3
1.1 Background	3
1.2 Audit team	3
1.3 Audit objectives	4
1.4 Audit scope	4
1.5 Audit period	4
2 AUDIT METHODOLOGY	9
2.1 Development of audit scope	9
2.1.1 Complaints or incidents	9
2.1.2 Consultation	9
2.2 Compliance evaluation	9
2.3 Opening meeting	9
2.4 Site interviews	10
2.5 Site inspection	10
2.6 Document and information review	10
2.7 Closing meeting	15
3 AUDIT FINDINGS	19
3.1 Compliance performance	19
3.2 Summary of agency notices, orders, penalty notices or prosecutions	19
3.3 Audit non-compliances	19
3.4 Previous audit recommendations	21
3.5 EMP, subplans and compliance documents	21
3.6 Environmental performance	21
3.7 Consultation outcomes	23
3.8 Complaints	23
3.9 Incidents	24
3.10 Site inspection	25
3.11 Site interviews	25
3.12 Previous annual review recommendations	25
3.13 Key strengths	26
4 RECOMMENDATIONS	29
4.1 Non-compliances	29
4.2 Opportunities for improvement	30

Tables

Table 2.1: Compliance status descriptors in this audit	9
Table 2.2: Documents and information reviewed	10
Table 3.1: Audit non-compliance findings.....	20
Table 3.2: Open recommendations from previous audit.....	21

Table 3.3: Environmental performance in key risk areas.....22

Table 4.1: Non-compliance recommendations29

Figures

Figure 1.1: Site layout5

Charts

Chart 3.1: Compliance status breakdown by descriptors19

Chart 3.2: Complaints recorded over time24

Chart 3.3: Environmental incidents over time25

Appendices

APPENDIX A AUDIT CRITERIA 31

APPENDIX B PLANNING SECRETARY AUDIT TEAM AGREEMENT 61

APPENDIX C CONSULTATION 65

APPENDIX D SITE PHOTOGRAPHS 68

EXECUTIVE SUMMARY

Conditions of Approval (CoA) issued under former Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (MP06_0185) on 15 April 2008 require an independent environmental audit to be completed within two years of commencing operation, and every three years thereafter.

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

- condition 7, schedule 4 of MP06_0185;
- the audit methodology recommended in *Independent Audit Post Approval Requirements* (Department of Planning, Industry and Environment, May 2020); and
- the processes and practice procedures identified in AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems.

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

The audit methodology included:

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

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

Consultation with Penrith City Council (PCC) and NSW Environment Protection Authority (EPA) was undertaken. Both stakeholders responded however no adjustments were made to the audit scope and/or audit table as the audit criteria addressed the focus areas sufficiently.

Of the 51 CoA's relevant to the audit, the following findings of compliance were made:

- 30 compliant;
- 12 non-compliant; and
- 9 not triggered.

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

CHAPTER 1

INTRODUCTION

1 INTRODUCTION

1.1 Background

The SUEZ Advanced Waste Treatment (SAWT) facility is in the north west corner of the Kemps Creek Landfill at 1725 Elizabeth Drive, Kemps Creek in the Penrith local government area (LGA). The site is approximately 40 kilometres (km) west of Sydney central business district. The site covers approximately 6 hectares (ha) of land within the property boundary of the existing Kemps Creek landfill (refer Figure 1.1). There are several sensitive receivers east and south of the site which are near the site and one receiver approximately 1 kilometre (km) west of the site.

SUEZ received development consent (MP06_0185) for the facility on 15 April 2008 under Part 3A of the EP&A Act and has been operational since 25 March 2009. Since determination of the original development consent, three modifications have been submitted:

- Modification 1 (MOD 1) – change to operating hours;
- Modification 2 (MOD 2) – increase annual processing capacity; and
- Modification 3 (MOD 3) – upgrades to the maturation pads and process.

SUEZ withdrew MOD 2; MOD 1 was determined on 20 September 2010 and MOD 3 was determined on 24 January 2014.

It is a requirement of MP06_0185 that within two years of commencing operations, and every three years thereafter, SUEZ must commission and pay for an independent environmental audit. The purpose of the audit is to ascertain the environmental performance of the development and the adequacy of its strategies, plans and programs.

Development consent for MP06_0185 was granted in 2008, prior to the NSW Department of Planning, Industry and Environment (DPIE) releasing the *Independent Audit Post-Approval Requirements* (Independent Audit PAR) in December 2018. For this reason, SUEZ has decided to audit the project in accordance with the existing conditions of approval (i.e. condition 7, schedule 4).

1.2 Audit team

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

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

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

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

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

Neville Hattingh

Neville has over 17 years' experience in environmental impact assessment, environmental planning and environmental management, across the transport infrastructure, resources, water, waste and property sectors. Neville has extensive international and local experience where he

has been involved in the project management and coordination of more than 300 environmental approvals and the multidisciplinary professionals and specialists involved therein.

Darren Green

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

1.3 Audit objectives

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

1.4 Audit scope

Condition 7, schedule 4 of MP06_0185 requires the scope of the audit to:

1. Be carried out by a suitably qualified, experienced and independent audit team containing a waste management specialist, whose appointment has been endorsed by the Director-general;
2. Include consultation with EPA;
3. Assess the environmental performance of the project, and its effects on the surrounding environment;
4. Determine whether the project is complying with the relevant standards, performance measures and statutory requirements;
5. Review the adequacy of the Environmental Management Plan for the project, compliance with the requirements of this approval, and any other licences and approvals; and, if necessary,
6. Recommend measures or actions to improve the environmental performance of the project, and/or any plan/program required under this approval.

1.5 Audit period

Condition 7, schedule 4 of MP06_0185 stipulates the following audit frequency:

- Within two years of commencement of operations; and
- Every three years thereafter;

The last independent environment audit assessed up to March 2018, therefore the audit period for this report is April 2018 to October 2020 (31 months).

Figure 1.1
Site layout

SUEZ ADVANCED WASTE TREATMENT FACILITY
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LEGEND

- Photos
- Administration building
- Biocell building
- Biofilter Plant Room
- Biofilters
- Diesel storage
- Fire water storage tank
- Hydrant pump room and chemical storage
- Leachate pond
- Lechate overflow pond
- Maturation pad
- Receiving hall
- Refining system
- Re-graded area (not sealed)
- Resource recovery
- Stormwater pond
- Tunnel composting system

CHAPTER 2

AUDIT METHODOLOGY

2 AUDIT METHODOLOGY

2.1 Development of audit scope

The scope of the audit has been developed with reference to Condition 7, schedule 4 of MP06_0185, any documented complaints or incidents and consultation with identified stakeholders.

2.1.1 Complaints or incidents

2.1.2 Consultation

PCC and the EPA were notified on 2 October 2020 of the independent environment audit being undertaken and were requested to provide any complaints, incidents or any issues they would like addressed (refer Appendix C).

2.2 Compliance evaluation

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

Table 2.1: Compliance status descriptors in this audit

Descriptor	Definition
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

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

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

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

2.3 Opening meeting

The audit commenced with an online opening meeting hosted by Element on 14 October 2020. The purpose of the opening meeting was to confirm the scope of the audit, the audit methodology

and agree on the people and representatives who will be involved in the audit. The meeting agenda included:

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

Attendees of the opening meeting included:

- Darren Green, Lead auditor, Element;
- Neville Hattingh, Technical and peer review; Element;
- Louise Saunders, NSW ARRTs and Organics Manager, SUEZ;
- Mike Banasaz, SAWT Process and Production Manager, SUEZ; and
- Mollie Hollingshead, Environmental and Sustainability Adviser, SUEZ.

During the opening meeting, the site inspection was agreed to be undertaken on 20 October 2020.

2.4 Site interviews

Site interviews were conducted on 20 October 2020. Site interviews were conducted with the project management team within the site office environment and during the site inspection. Interviewees included:

- Mike Banasaz, SAWT Process and Production Manager, SUEZ; and
- Mollie Hollingshead, Environmental and Sustainability Adviser, SUEZ.

2.5 Site inspection

An inspection of the entire facility was carried out on 20 October 2020. Mike Banasaz and Mollie Hollingshead accompanied the lead auditor during the inspection. The site inspection comprised a walkover of the entire facility, including the development perimeter, all leachate and stormwater dams, the upper and lower maturation pads, biofilters and an explanation of the processes and environmental controls implemented by the development.

2.6 Document and information review

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

Table 2.2: Documents and information reviewed

Name	Description
01. PLANS004.2.1 EMP_SAWT_KempsCreek.pdf	SAWT EMP, Version 4
02. PLANS004.1.1.1 Odour Management Plan - Kemps Creek SAWT (3).pdf	SAWT OMP, Version 3
03. AEMR 2017-2018 Kemps Creek SAWT.pdf	AEMR 2017-18
04. AEMR 2018-2019 Kemps Creek SAWT.pdf	AEMR 2018-19
05. Corrective Action Report April 2018 - Oct 2020.xlsx	Corrective Action Report – Summary for audit period
06. Daily Weather Summary.xlsx	Example of daily weather report from weather station

Name	Description
07. 191119 - Timelines for completion of actions recommended from IEA (004) (002).docx	Timeline of actions from last audit
08. Environmental Noise Compliance Report 2018 - S10432-R1.pdf	Environmental noise compliance report 2018
09. Clarifications on actions from IEA.pdf	Correspondence from SUEZ to DPIE seeking clarification of some actions from the last audit
10. Correspondence to DPE regarding conditions of approval PDF.pdf	Correspondence from SUEZ to DPIE seeking clarification on some conditions of approval
11. FORM020 - Risk Management - Obtrusive Effects of Outdoor Lighting.pdf	Risk assessment of outdoor lighting
12. Dam quantity and construction.pdf	Dam design specifications and material quantities
13. Licences Permits Policies REG006 Part 1 - Aug 2020.xlsx	Licence, permits and approvals for SAWT
14. 180515 - Inwards - Department of Planning - Confirmation for IEA.pdf	Correspondence from DPIE acknowledging receipt of the first IEA (2014-2017)
15. Start date.jpg	Photo showing operational date of facility
16. 20191129 - Signed letter - Approval of updated EMP and OMP.pdf	Correspondence from DPIE confirming approval of EMP and EMP per condition 9 schedule 4
17. REG004 - Training Matrix - Kemps Creek SAWT - V4.xlsm	SAWT training matrix
170719 - REG001 - SAWT Improvement Plan.xls	SAWT Improvement Plan
170927 - DOP EPA - Outwards - Odour Improvement Report.pdf	Continuous Improvement Report – September 2017
18. Government Gazette 2 November 2018.pdf	Copy of Government Gazette
180102 - REG001 - SAWT Improvement Plan.xls	SAWT Improvement Plan
180515 - Inwards - Department of Planning - Confirmation for IEA.pdf	DPIE confirmation of IEA 2014-2017.
180601 - Daily Odour Tour - Kemps Creek SAWT.pdf	Completed odour checklist
180604 - EPA - Email - Outwards (acknowledgement) - Independent Environmental Audit PDF.pdf	EPA confirmation of IEA 2014-17
180613 - REG001 - SAWT Improvement Plan.xls	SAWT Improvement Plan
180620 - Email - Outwards - DOP - AMER & OMP Submission.pdf	Submission of 2017 Continuous Improvement Report
1809 - Amended S10132-R04 - IECA Report.pdf	Second IEA
180926 - Response to Odour Complaint detected downwind of SAWT 19 9 18.msg	SUEZ correspondence to EPA responding to odour complaint
181224 - Alleged odours from SUEZ SAWT facility on 19 December 2018 - Lic No 12889 - Ciram l18469-2018.msg	SUEZ correspondence to EPA responding to odour complaint
19. INV00003332.pdf	Invoice from bush regenerator
190101 - Odour Compliant Response to EPA.PDF	SUEZ correspondence to EPA responding to odour complaint
190117 - RE Request for email.msg	EPA correspondence to SUEZ requesting information on an odour complaint
190125 -Odour Complaint l01180-2019 SUEZ Kemps Creek SAWT EPL 12889.msg	EPA correspondence to SUEZ requesting information on an odour complaint
190129 - Correspondence to requested information following EPA Officerspdf	SUEZ correspondence to EPA responding to odour complaint
190201 - Response to the Odour Compliant on 24 Jan 2019- SUEZ SAWT.msg	SUEZ correspondence to EPA responding to odour complaint
190205 - Email to Phil.msg	Internal correspondence

Name	Description
190214 -Fwd Alleged odour from Suez Kemps Creek Waste facility (Lic 12889 and 4068) on 12 Feb 2019.msg	EPA correspondence to SUEZ regarding odour management
190221 - Alleged odour from Suez Kemps Creek Waste facility (Lic 12889 and 4068) on 12 Feb 2019.msg	SUEZ correspondence to EPA responding to odour complaint
190304 - Odours detected from SAWT on 26 Feb 2019.msg	SUEZ correspondence to EPA responding to odour complaint
190308 - Alleged odours from SUEZ SAWT facility on 5 March 2019 - Lic No 12889.msg	SUEZ correspondence to EPA responding to odour complaint
19031 - Alleged odours from SUEZ SAWT facility on 11 March 2019 - Lic No 12889.msg	EPA correspondence to SUEZ requesting information on an odour complaint
190311- 1753886 - SUEZ-env Site Alert - Kemps Creek Complaint Odour.msg	Internal correspondence
190315 - Response to EPA regarding Odour Complaint on 11 March 2019.pdf	SUEZ correspondence to EPA responding to odour complaint
190315 -Response to odour complaint on 11 March 2019.msg	SUEZ correspondence to EPA responding to odour complaint
190327 - Alleged odour from SUEZ SAWT Facility on 26 and 27 March 2019.msg	EPA correspondence to SUEZ requesting information on an odour complaint
190403 -Response to alleged odour from SUEZ SAWT Facility on 26 and 27 March 2019.msg	SUEZ correspondence to EPA responding to odour complaint
190404 -1772915 - SUEZ-env Site Alert - Kemps Creek Complaint Odour.msg	Internal correspondence – forwarding complaint
190405 - Alleged odours detected in Luddenham on 28 March and 1 April 2019 -.msg	EPA correspondence to SUEZ requesting information on an odour complaint
190409 - Response to the odour complaint EPA 28 March and 1 April 2019.pdf	SUEZ correspondence to EPA responding to odour complaint
190415 - RE_ Odour complaint for 9 April 2019 in Twin Creeks.msg	SUEZ correspondence to EPA responding to odour complaint
190506 - RE_ Alleged odours from SUEZ SAWT facility on 26 April 2019 - Lic No 12889.msg	SUEZ correspondence to EPA responding to odour complaint
190512 - Penrith council annual fire safety statement.pdf	SUEZ response to PCC regarding Annual Fire Safety Statement not submitted
190531.pdf	PCC correspondence to SUEZ regarding Annual Fire Safety Statement not submitted
190611 - Acknowledgement of fire safety statement.pdf	PCC correspondence to SUEZ acknowledging receipt of Annual Fire Safety Statement
190708 - Kemps Creek SAWT Fire Statement.pdf	Copy of Fire Safety Statement 2019
190821 - Show Cause.pdf	EPA Show Cause to SUEZ regarding potential water pollution incident and breach of licence conditions on 16 July 2019
190910 - SAWT EPA Response to Show cause v4.docx	SUEZ response to EPA Show Cause
191224 - REG001 - SAWT Improvement Plan.xls	SAWT Improvement Plan
19-1449-[R00].pdf	Biofilter laboratory analysis results
20. 180622 - Letter - Outwards - DOP - IEA clarification.pdf	SUEZ correspondence to EPA
200625 - REG001 - SAWT Improvement Plan.xls	SAWT Improvement Plan
200909 - EPA Advisory Letter - SUEZ SAWT - Potential breach of s120 and s64 of POEO Act on 16 July 2019.pdf	EPA response to SUEZ Show Cause response – no action taken
20-1423-[R00].pdf	Biofilter laboratory analysis results
20180621_Surface Water COC_ALS.pdf	Chain of Custody

Name	Description
20180621_Surface Water Results_ALS.pdf	Water Quality analysis
20190404_Surface Water COC_ALS.pdf	Chain of Custody
20190404_Surface Water Results_ALS.pdf	Water Quality analysis
20200210_Wet Weather Discharge MP1_SUEZ.pdf	Water Quality analysis
20200211 - EPA Report Kemps Creek Feb 2020_ Ref No C01890-2020.docx	EPA notification of leachate discharge on 10 February 2020
20200211_Leachate Overflow Results_SUEZ.pdf	Water quality analysis – leachate discharge
20200717_Surface Water MP2 COC_ALS.pdf	Chain of Custody
20200717_Surface Water MP2_ALS.pdf	Water Quality analysis
20200717_Surface Water MP3 COC_ALS.pdf	Chain of Custody
20200717_Surface Water MP3_ALS.pdf	Water Quality analysis
20200717_Surface Water MP4 COC_ALS.pdf	Chain of Custody
20200717_Surface Water MP4_ALS.pdf	Water Quality analysis
20200717_Surface Water MP5 COC_ALS.pdf	Chain of Custody
20200717_Surface Water MP5_ALS.pdf	Water Quality analysis
20200717_Surface Water MP6 COC_ALS.pdf	Chain of Custody
20200717_Surface Water MP6_ALS.pdf	Water Quality analysis
20200727_Wet Weather Discharge MP1_EURO.pdf	Water Quality analysis
20200810 - EPA Notification - Ref No C12943-2020.pdf	EPA notification of exceedance of criteria at licensed discharge point
20200810_Wet Weather Discharge MP1_ALS.pdf	Water Quality analysis
20201104 - DPIE Leachate Report_SAWT_Feb 2020.pdf	SUEZ notifying DPIE of leachate discharge
3820_001.pdf	DPIE correspondence to SUEZ confirming extension of time for second IEA
94484 Environmental Compliance Audit SITA Kemps Creek Oct 11.pdf	First IEA
Alleged odour from SUEZ SAWT Facility on 26 and 27 March 2019.msg	EPA correspondence to SUEZ requesting information on an odour complaint
Alleged odours from SUEZ SAWT facility on 5 March 2019 - Lic No 12889.msg	SUEZ correspondence to EPA responding to odour complaint
ARApplicationSummary_4446 final.pdf	Signed Annual Return 2018-19
ARApplicationSummary_6572_16.09.2020.pdf	Signed Annual Return 2019-20
Biofilter floor.pdf	Structural drawings
Complaint 108420-2018.pdf	SUEZ correspondence to EPA responding to odour complaint
Complaint response EPA_29062018.docx	SUEZ correspondence to EPA responding to odour complaint
Correspondence regarding two conditions of approval MP 06_185.msg	SUEZ correspondence to DPIE regarding 3.5 and 3.11
Correspondence to EPA in regard to odour complaint.pdf	SUEZ correspondence to EPA responding to odour complaint
DA licence 06_0185 - Kemps Creek SAWT - SUEZ - AEMR & Continuous Odour Improvement Report.msg	SUEZ correspondence to DPIE submitting Continuous Improvement Report
Fire Safety Statement June 2020 Kemps Creek.pdf	Copy of Fire Safety Statement 2020
FORM041 - Compliance Evaluation Form - Kemps Creek SAWT.xlsx	SUEZ EPL12889 Compliance Evaluation Form for Annual Return 2017-18

Name	Description
FORM041 SAWT 12889_V4 Final.xlsx	SUEZ EPL12889 Compliance Evaluation Form for Annual Return 2019-20
FORM041.xlsx	SUEZ EPL12889 Compliance Evaluation Form for Annual Return 2018-19
FW_ Alert # 1791109 - SUEZ-env Site Alert - Kemps Creek Complaint Odour.msg	Internal correspondence – forwarding complaint
Gazette_2018_2018-114.pdf	Government Gazette
Gazette_2020_2020-90.pdf	Government Gazette
HPE CM Response to the Odour Compliant on 24 Jan 2019- SUEZ SAWT.msg	SUEZ correspondence to EPA responding to odour complaint
KC - MTD - 31.7.18.xlsx	Mandalay results
KC MTD - 31.5.18.xlsx	Mandalay results
Kemps Creek SAWT annual return - signed.pdf	Signed Annual Return 2017-18
MAN016 - Product Quality Manual - Kemps Creek SAWT (6).docx	Product Quality Manual
MAN030 -Biofilters Manual.docx	Biofilters Manual, Version 2, 2016
MTD - 29.2.20 - run 5.3.20.xlsx	Mandalay results
MTD - 30.11.18.xlsx	Mandalay results
MTD - 30.4.18.xlsx	Mandalay results
MTD - 30.4.20.xlsx	Mandalay results
MTD - 30.6.20 v2.xlsx	Mandalay results
MTD - 30.9.18.xlsx	Mandalay results
MTD - 30.9.20.xlsx	Mandalay results
MTD - 31.1.20.xlsx	Mandalay results
MTD - 31.10.18.xlsx	Mandalay results
MTD - 31.12.18.xlsx	Mandalay results
MTD - 31.3.20.xlsx	Mandalay results
MTD - 31.5.20 v2.xlsx	Mandalay results
MTD - 31.7.20 v1.xlsx	Mandalay results
MTD - 31.8.18.xlsx	Mandalay results
MTD - 31.8.20 v1.xlsx	Mandalay results
MTD - KC - 30.6.18.xlsx	Mandalay results
October 20.pdf	Biofilter and water scrubber checklist
Odour Complaint 5th March 2019.xlsx	SUEZ odour complaint investigation information
Odour Complaint for 26 March 27 March 2019.xlsx	SUEZ odour complaint investigation information
Odour complaint for 9 April 2019 in Twin Creeks.msg	SUEZ correspondence to EPA responding to odour complaint
Odour complaint on 28 March and 1st April.csv	SUEZ weather station information for a complaint
Odour Complaint on 4 April 2019.xls	SUEZ odour complaint investigation information
Odour Complaint on 1 May 2019.xls	SUEZ odour complaint investigation information
Product Quality Manual - Kemps Creek SAWT ARRT - Appendices - Nov 16.xlsx	Product Quality Manual Appendices
RE_ Alleged odours from SUEZ SAWT facility on 26 April 2019 - Lic No 12889.msg	SUEZ correspondence to EPA responding to odour complaint
RE_ HPE CM_ RE_ Independent Environmental Audit Review - SUEZ Kemps Creek- MP 06_0185.msg	DPIE correspondence accepting request for extension for Second IEA.
RE_ Timelines for completion of actions from IEA MP 06_0185.msg	DPIE correspondence acknowledging receipt of SUEZ corrective actions from Second IEA.

Name	Description
RE_ Updated Environmental Management Plan and Odour Management Plan for SUEZ SAWT Facility.msg	DPIE correspondence to SUEZ on updated EMP and OMP
Response to EPA Complaint on 19 Dec 2018.pdf	SUEZ correspondence to EPA responding to odour complaint
Response to EPA regarding odour complaint on 1 March 2019.pdf	SUEZ correspondence to EPA responding to odour complaint
Request for extension.docx	SUEZ correspondence to DPIE requesting an extension of time for second IEA.
Response EPA Complaint I10586-2018 signed.pdf	SUEZ correspondence to EPA responding to odour complaint
Response letter to EPA regarding odour issue on 12.02.19 PDF.PDF	SUEZ correspondence to EPA responding to odour complaint
Response to Complaint I13915-2018 SUEZ Kemps Creek SAWT EPL 12889.msg	SUEZ correspondence to EPA responding to odour complaint
Response to Odour Complaint I01180-2019 SUEZ Kemps Creek SAWT EPL 12889 PDF.pdf	SUEZ correspondence to EPA responding to odour complaint
Response to Odour Complaint on 5 March 2019.pdf	SUEZ correspondence to EPA responding to odour complaint
Response to Odour Complaint member of public on 26 April 2019.docx	SUEZ correspondence to EPA responding to odour complaint
Response to Odour Complaint by member of public on 26 April 2019.docx	SUEZ correspondence to EPA responding to odour complaint
Response to Odour Complaint from EPA on 26 and 27 March 2019 signed.pdf	SUEZ correspondence to EPA responding to odour complaint
Response to Odour Complaint from EPA on 26 and 27 March 2019.docx	SUEZ correspondence to EPA responding to odour complaint
Response to Odour Complaint on 26 April 2019.pdf	SUEZ correspondence to EPA responding to odour complaint
Response to the odour complaint on 28 February and 1 March.pdf	SUEZ correspondence to EPA responding to odour complaint
SAWT complaint I08420-2018 20 June 2018.msg	SUEZ correspondence to EPA responding to odour complaint
SEDLPR0219100111500.pdf	Biofilter and water scrubber checklist
Signed Response to EPA Complaint on 5 Oct 2018.pdf	SUEZ correspondence to EPA responding to odour complaint
Stormwater overflow at SUEZ Kemps Creek EPR reference.msg	SUEZ correspondence to EPA submitting incident report.
Structural Drawings.pdf	Structural drawings
SUEZ Kemps Creekside Boundary.pdf	Site layout
Updated Environmental Management Plan and Odour Management Plan for SUEZ SAWT Facility.MSG	SUEZ correspondence to DPIE submitting updated EMP and OMP
YTD Mandalay 2019.xlsx	Mandalay results

2.7 Closing meeting

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

CHAPTER 3

AUDIT FINDINGS

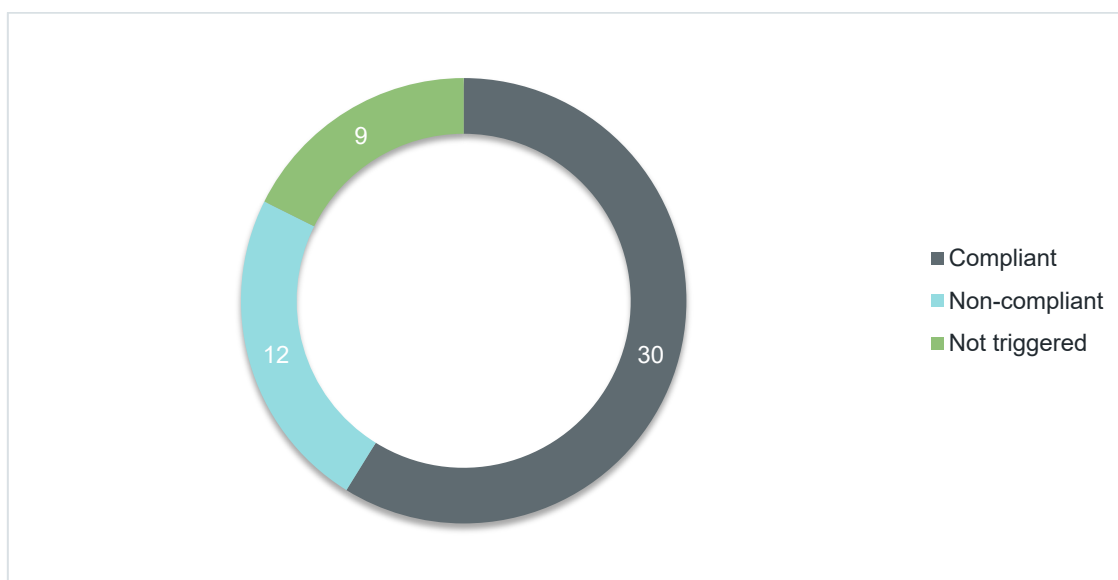
3 AUDIT FINDINGS

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

3.1 Compliance performance

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

Chart 3.1: Compliance status breakdown by descriptors



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

During the audit period the following notable interactions with other agencies have been identified:

- In June 2018 EPA issued a penalty notice (No. 3173525805) for breaching a condition of the licence on 24 April 2018. The offence related to composting MSW in damaged tunnels on which tunnel doors could not be closed.
- In April 2019 PCC issued a penalty infringement notice for failing to submit an Annual Fire Safety Statement.
- In August 2019 EPA issued a show cause following a suspected water pollution incident and breach of licence conditions. SUEZ replied to the EPA's show cause in September 2019. EPA informed SUEZ on 9 September 2020 that no further action would be taken, based on the measures SUEZ implemented in response to the issue.

3.3 Audit non-compliances

Table 3.1 presents the findings for non-compliances identified during the audit. The full details of the condition, evidence and findings is stated in Appendix A.

Table 3.1: Audit non-compliance findings

Approval (ID)	Findings
2.4	<p>DPiE has instructed AEMR's to be submitted within 3 months of the end of the reporting period.</p> <p>The annual reporting period ends 29/07 every year which aligns with the annual return period for reporting against the EPL. Therefore, an AEMR for the 2019-2020 period should have been submitted to DPiE by 29 October 2020.</p> <p>No AEMR for 2019-20 has been submitted at the time of this audit.</p>
3.5	<p>The product quality manual prepared for SAWT Kemps Creek would be sufficient to address the monitoring objectives of this condition, but there is no evidence of the EPA having been consulted in the preparation of this document nor is there evidence of DPiE approving this document.</p> <p>The current version of the EMP does not address the monitoring objectives of this condition.</p>
3.11	<p>SUEZ has not prepared and submitted a feasibility report for DPiE approval. SUEZ has sought clarification from DPiE on this condition but no responses from DPiE to SUEZ's request for clarification were provided. It is noted that the AEMR 2018-19 identified an action for SUEZ to seek a modification to the project approval to remove this condition because the development cannot comply with the requirement.</p>
3.20	<p>EMP which was originally submitted on 29/04/2009 and approved by DPiE on 30/04/2009, included a soil, water and leachate management plan.</p> <p>The EMP was updated following the last independent environment audit and approved by DPiE on 29/11/2019.</p> <p>The plan however does not identify who prepared this plan (i.e. suitably qualified and experienced expert) and there is no evidence of EPA, NOW or Council having been consulted in the preparation.</p>
3.23	<p>The stormwater management system included in the EMP does not demonstrate how the scheme is consistent with Managing Urban Stormwater: Council Handbook (EPA) nor does the scheme demonstrate how the system has sufficient capacity for the 90th percentile 5-day rainfall event.</p>
3.24	<p>The EMP (July 2020) does not include a groundwater monitoring program or baseline data.</p>
3.25	<p>The EMP (July 2020) does not include a groundwater response plan, investigation and notification procedures as well as how to respond to surface or groundwater contamination.</p>
4.3	<p>SUEZ notified EPA of a pollution incident on 10/02/2020 and only notified DPiE on 4/11/2020. Similarly, one wet weather discharge during the audit period recorded an exceedance of water quality criteria but DPiE was not notified.</p>
4.4	<p>The written report to EPA for an incident notified on 10/02/2020 was submitted within required notification period, and email correspondence provided by SUEZ demonstrates this. This same written report was provided to DPiE on 4/11/2020, outside the required notification period.</p>
4.5	<p>MP06_0185 was determined on 16/04/2008, therefore the AEMR should be due every April. However, correspondence from DPiE dated 08/07/2020 acknowledged the annual reporting period (EPL) ending on 29/07 every year and instructed AEMR's to be submitted within 3 months of the end of this reporting period (i.e. by 29/10 every year).</p> <p>AEMR 2017-18 covered the period 29/07/2017 to 29/07/2018 and was finalised on 20/11/2019.</p> <p>The AEMR 2018-19 that covered the period 29/07/2018 to 29/07/2019, was finalised on 27/04/2020 and submitted to DPiE on 25 May 2020.</p> <p>AEMR 2019-20 should cover the period 29/07/2019 to 29/07/2020 and was due to be submitted to DPiE on 29/10/2020.</p>
4.6	<p>The AEMR includes a section on odour monitoring (s6.6), however the information included does not meet the requirements of this condition.</p> <p>The OMP states continuous improvement must be reported annually to DPiE in accordance with "Environmental auditing and review" in the EMP (s1.10).</p> <p>The EMP, s1.10, states a continuous improvement report must be prepared but does not state the frequency or what this report must address.</p> <p>A Continuous Improvement Report for 2017 was submitted to DPiE in June 2018. No previous or subsequent report has been provided.</p>

Approval (ID)	Findings
4.10	The website as accessed on 21 October 2020 did not have the first Independent environment audit, 2011.

3.4 Previous audit recommendations

Two previous audits have been completed, with the first audit being undertaken in 2011 and the second audit undertaken in 2018. Table 3.2 is an update from SUEZ on outstanding recommendations from the previous audit. Progress on addressing the actions from previous audits has been provided to DPIE in several instances.

Table 3.2: Open recommendations from previous audit

Recommendation from previous audit	Action taken	Status
Cover the Food and Garden Organics (FGO) processing pad. Suez to review stormwater quality upon completion.	SUEZ submitted a modification application to DPIE in March 2018.	On hold because the facility no longer processes FGO.
SUEZ to source feasibility report submitted to the DPIE. If feasibility report is unable to be found, further consultation to occur with DPIE in reference to proving compliance with this licence condition	SUEZ has sought clarification from DPIE on how to proceed with this recommendation.	Awaiting response from DPIE.
Parameters agreed upon by the EPA (b) composting must be undertaken for set periods of time and at certain temperatures, oxygen and moisture levels so that the composted material has been fermented properly and is adequately stabilised prior to any outdoor storage of the composted material (parameters to be agreed with the EPA prior to operations at the premises)	SUEZ has sought clarification from EPA.	Awaiting response from EPA.

3.5 EMP, subplans and compliance documents

All environmental management plans, subplans and compliance documents under MP06_0185 have been prepared, approved by DPIE and their implementation was observed during the site inspection and site interviews.

3.6 Environmental performance

The environmental performance of the site is generally adequate, however improvements in sediment control along the shared access road should be investigated (refer Table 3.3).

Table 3.3: Environmental performance in key risk areas

Key issue	Risk	Commentary
Air quality and odour	<p>Odour from operation activities affecting surrounding landowners.</p> <p>Dust during operation affecting amenity of the surrounding area.</p>	<ul style="list-style-type: none"> ▪ The site no longer accepts FGO and there is no compost maturing on the upper and lower maturation pads. ▪ The pre-refining trommel was decommissioned. ▪ Composting was being undertaken within enclosed tunnels. ▪ All exhaust air from the receival hall, composting tunnels and biocell was being passed through the biofilter. ▪ The biofilter was observed to be operating and analysis results of biofilter material being undertaken at regular intervals. ▪ Maintenance on the vent ducts to the biofilter system was being undertaken at the time of the site inspection. ▪ Doors at the Receival Hall were closed and observed to only open when a vehicle was delivering material. The doors of the biocell were closed and the auditor was informed they only open when the windrow turner is operating. <p>The internalisation of all compost maturation and absence of FGO appears to have reduced the odour generated by the site. The site is managing its potential air quality and odour impacts adequately.</p>
Soil and water	<p>Clean and dirty water (sediment laden) and leachate leaving the site and impacting downstream environments.</p> <p>Contamination of unsealed surfaces.</p>	<ul style="list-style-type: none"> ▪ The site has clear controls and processes to separate stormwater and leachate. ▪ During the site inspection stormwater grids were observed to have sediment controls (where near unsealed surfaces) and were free of debris and contaminants. ▪ All aerators were operational in all detention basins. ▪ The overflow leachate pond was near empty. ▪ Freeboard markers were observed at each basin. ▪ No compost or material was being stockpiled on unsealed surfaces. ▪ Roads within SAWT are sealed and the potential for dirt-tracking from SAWT is very low. SAWT vehicles do however traverse the same route that the landfill vehicles do, but SAWT vehicles do not go through the wheel wash (because they have not traversed unsealed roads). There is therefore a likelihood SAWT vehicles indirectly track some debris from the landfill road out of the premises on to the site access road. <p>The site is managing its potential water quality impacts adequately.</p>
Noise	Operational and transport noise impacts from traffic and trucks in and out of the site, machinery and plant upon sensitive receivers.	<ul style="list-style-type: none"> ▪ Background noise levels are dominated by traffic along Elizabeth Drive which is significantly above the project noise limits. ▪ During the inspection, all plant was within the building enclosure, therefore external noise levels were not significant. ▪ Noise from the biofilter was noticeable when near the building but was not audible in other locations. ▪ No noise complaints have been recorded during the audit period. <p>The site is managing its potential noise impacts adequately.</p>
Traffic	Increased traffic on the roads leading to the site. Ability of the site to safely operate within increased traffic flow.	<ul style="list-style-type: none"> ▪ During the site inspection internal traffic movements were being managed adequately, site representatives were aware of the constraints of the site and were managing these appropriately, and the site was not impacting public roads. <p>The site is managing its potential traffic impacts adequately.</p>

3.7 Consultation outcomes

The EPA responded on 16 October 2020 and the points below is a summary of their correspondence:

- Particular attention should be given to:
 - The air extraction and biofilter system is adequately maintained.
 - Stormwater drains are free of debris and contaminants.
- EPL conditions O5.2 to O5.8. These conditions pertain to odour management.
- EPL conditions O6.3, O7.2, O7.3 and O7.4. These conditions pertain to the size of the outdoor maturation pad, management of the leachate dams and the doors of the Waste Receiving Hall.

PCC responded on 21 October 2020 and the points below is a summary of their correspondence:

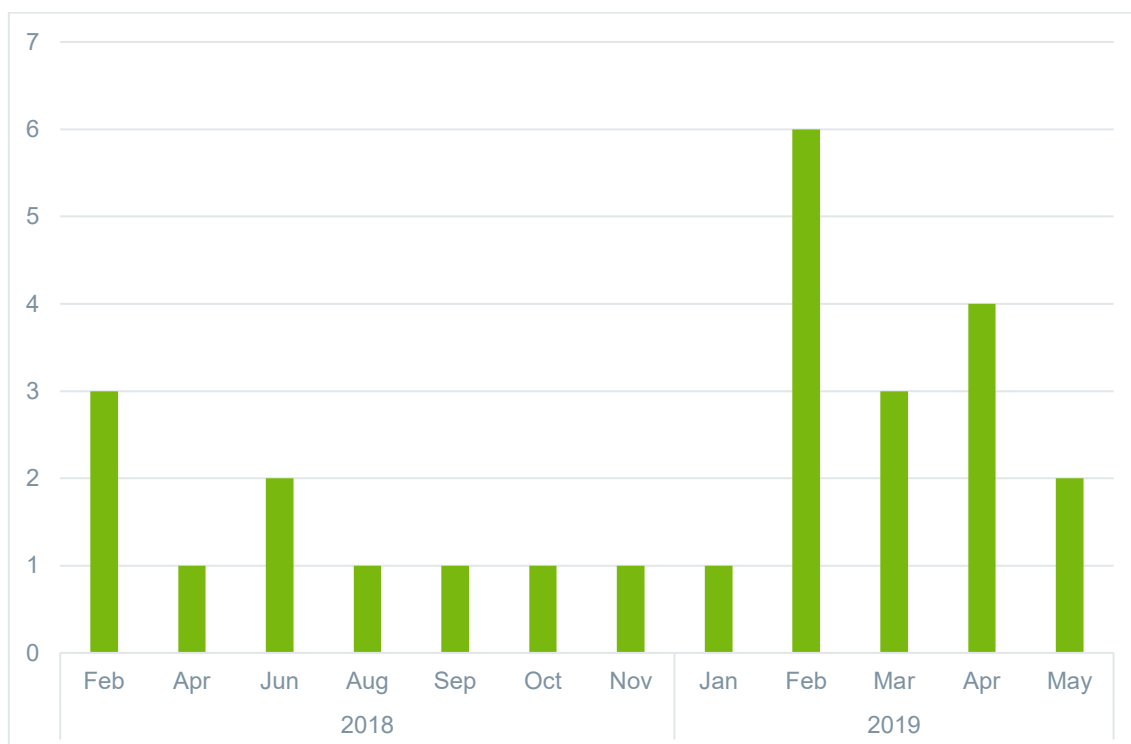
- Mud tracking from the premises of SUEZ Kemps Creek facility has been noted as recently as October 2020 and have been observed on other occasions during wet weather events. Sediment tracked onto Elizabeth Drive builds up and finds its way into nearby water ways.
- SUEZ Kemps Creek facility has a history of odour complaints and is one of three facilities identified in a regional odour study in 2012-13.
- SAWT was fined in 2017 for failing to comply with its EPL.
- PCC issued a penalty infringement notice (PIN) for failure to submit an annual Fire Safety Statement.
- PCC requested the audit review all conditions of MP06_0185.

The feedback from PCC did not require any amendment to the audit criteria in Appendix A and the feedback from the EPA has been addressed in the environmental performance section of this audit.

3.8 Complaints

During the audit period 23 complaints were recorded by SUEZ and all were related to odour. Notably, no complaints have been recorded after May 2019 (refer Chart 3.2), which coincides with the cessation of processing FGO and the revocation by the Environment Protection Authority (EPA) of *The organic outputs derived from mixed waste order 2014* and the maturing of compost in the outside maturation pads.

Chart 3.2: Complaints recorded over time



All the complaints are recorded by SUEZ as having been closed-out, including complaints reported by the EPA on behalf of a complainant. SUEZ responded to all EPA queries with the requested information.

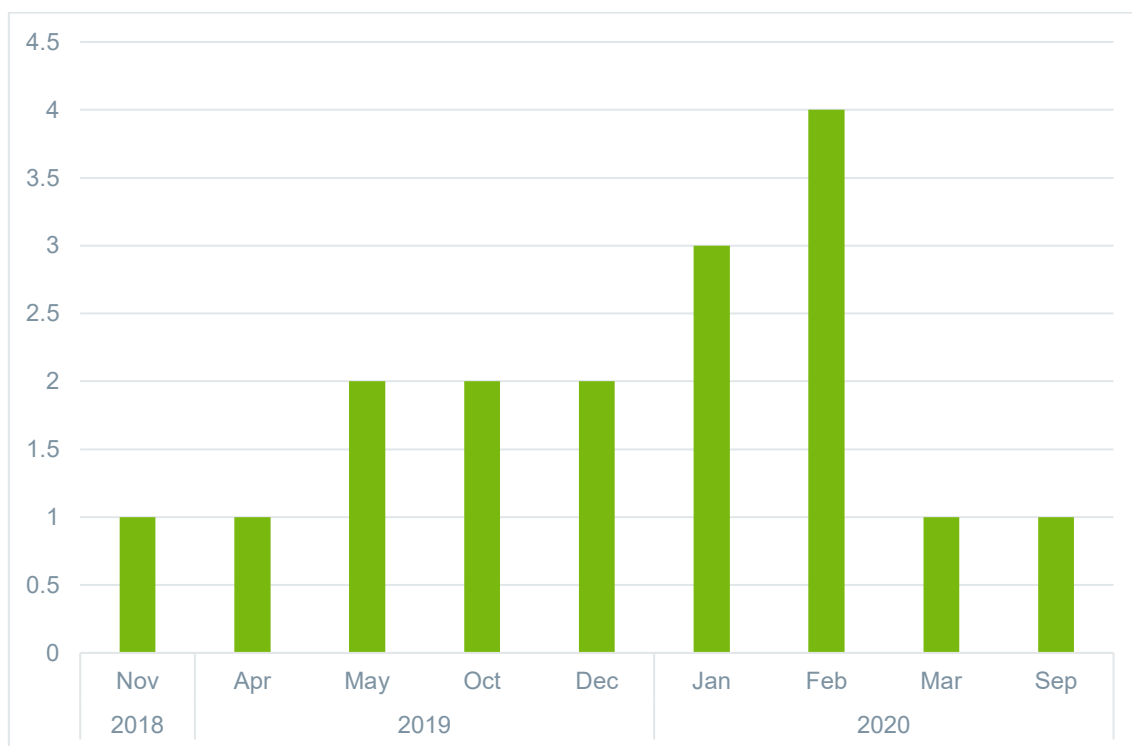
3.9 Incidents

During the audit period 17 environmental incidents were recorded by SUEZ (refer Chart 3.3). It should be noted that the environmental incident classification used in their system is broad and not consistent with the definition of a notifiable “environmental incident”. Most of the environmental incidents recorded were small fires, with only two incidents considered by the lead auditor to be notifiable:

1. A discharge from the leachate overflow dam on 10 February 2020 following a 1:10 year rain event. SUEZ identified this as a pollution incident as the discharge was from an unlicensed point. SUEZ implemented the notification process cited in the Pollution Incident Response Management Plan (PIRMP) and provided evidence and sampling results to the EPA. The EPA has not taken any action in response to this event.
2. A wet weather discharge from a licensed discharge point (Point 1) from during the 10th and 11th August 2020 which exceeded the concentration limits stated in environment protection licence 12889 (EPL 12889). Notably, ammonia and total suspended solids exceeded the limits. The EPA was notified and provided additional evidence and sampling results.

In both instances SUEZ has followed their pollution incident response process as required by all license holders, and the EPA has been provided the circumstances of the discharge and analytical results.

Chart 3.3: Environmental incidents over time



3.10 Site inspection

A site inspection as part of the audit was undertaken on 20 October 2020. During the site inspection, observations on environmental performance were made and captured by site photos (refer Appendix D).

The environmental performance of the site is generally adequate, however improvements in sediment control along the shared access road should be investigated.

3.11 Site interviews

The personnel listed in Section 2.4 were interviewed during the site visit. Site interviews were generally structured around understanding the operational processes and procedures, key environmental risks and how the site demonstrates compliance with MP06_0185 and manages key environmental risks.

Overall, the site interviews demonstrated that the personnel had a good understanding of environmental risks and controls required to mitigate these risks and comply with MP06_0185.

3.12 Previous annual review recommendations

Two annual environmental management reviews (AEMR) were provided, covering the following periods:

- 2017 to 2018; and
- 2018 to 2019.

An AEMR for the period 2019 to 2020 was not available at the time of this audit; it has been noted in Table 4.1 and Appendix A that the AEMR for 2019-2020 is currently overdue.

3.13 Key strengths

At no time during the site inspection were unsafe actions or activities, or activities presenting a material harm to the environment. Furthermore, the personnel interviewed had a strong understanding of the requirements of MP06_0185 and demonstrated a genuine willingness to comply with their environmental obligations.

CHAPTER 4

RECOMMENDATIONS

4 RECOMMENDATIONS

4.1 Non-compliances

Almost half of the non-compliances could be rectified by updating management plans, ensuring the updates address consultation requirements and the specific requirements of each condition. The remainder of the non-compliances relate to environmental performance and late submissions. The adoption of the proposed environmental performance initiatives would aide SUEZ in continuous improvement and the correspondence with DPIE is necessary given submission of the required deliverables is late. Table 4.1 provides more detail regarding the non-compliance recommendations.

Table 4.1: Non-compliance recommendations

Approval (ID)	Recommendations	Category
2.4	Inform DPIE of the late submission of the AEMR and request an extension of time.	Late submission
3.5	Consult with EPA on the waste monitoring requirements from the product quality manual, document this consultation and the monitoring requirements in the EMP.	Management plan update
3.11	Prepare and submit a modification to remove the condition about the feasibility report.	Modification
3.20	Include evidence of consulting EPA, DPIE Water and Council in the Soil, Water and Leachate Management Plan. If this evidence is not available, these stakeholders should be provided an opportunity to comment on the current plan, and the plan should be updated and SUEZ attempts at consultation should be documented.	Management plan update
3.23	The stormwater management scheme needs to demonstrate (1) compliance with Managing Urban Stormwater: Council Handbook (EPA) and (2) that the system has capacity to handle the 90th percentile 5 day rainfall event.	Management plan update
3.24	The EMP needs to be updated to include a groundwater monitoring program and baseline data; or the condition should be modified and the need for groundwater monitoring removed.	Management plan update OR modification
3.25	The EMP needs to be updated to include surface water, groundwater and leachate response plan that meets the requirements of this condition.	Management plan update
4.3	Hold an environmental workshop with mandatory attendance by all SAWT employees to identify and explain all environmental commitments of both the EPL and development consent.	Environmental performance
4.4		
4.5	Inform DPIE of the late submission of the AEMR and request an extension of time.	Late submission
4.6	Update either the EMP or the OMP to clearly capture the annual reporting need and requirements of this condition.	Management plan update
4.10	Upload the first audit.	Environmental performance

4.2 Opportunities for improvement

The following opportunities for improvement have been identified:

- Update the erosion and sediment control plan to include potential indirect activities (e.g. debris tracking from the access route shared with the landfill vehicles); and
- Consider how SAWT could coordinate controls with the landfill or identify some additional erosion and sediment control measures which will better mitigate this potential impact.

APPENDIX A

AUDIT CRITERIA

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
2.1	The Proponent shall implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, and/or rehabilitation of the project.	Evidence collected in this audit; Site observations	Compliance with the condition has been demonstrated. SUEZ were observed to be implementing measures identified in the EMP and OMP and no harm to the environment was observed during the site inspection.		Compliant
2.2	The Proponent shall carry out the project generally in accordance with the: (a) EA; (b) statement of commitments; and (c) Modification application 06_0185 MOD 1; (d) Modification application 06_0185 MOD 3; and (e) conditions of this approval. Note: The layout of the project is shown in Appendix 1 and Appendix 1A.	The documents and items listed were verified through site observations, documentary evidence and reviews aerial photography covering the reporting period.	Compliance with the condition has been demonstrated.		Compliant
2.3	If there is any inconsistency between the above, then the conditions of this consent shall prevail to the extent of the inconsistency.	N/A	No inconsistencies were reported or identified.		Not triggered
2.4	The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) any reports, plans, programs or correspondence that are submitted in accordance with this approval; and (b) the implementation of any actions or measures contained	AEMR 2017-18 AEMR 2018-19 DPIE correspondence dated 08/07/2020	DPIE has instructed AEMR's to be submitted within 3 months of the end of the reporting period. The annual reporting period ends 29/07 every year which aligns with the annual return period for reporting the EPL. Therefore, an AEMR for the 2019-2020 period should have been submitted to DPIE by 29 October 2020.	Inform DPIE of the late submission of the AEMR and request an extension of time.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	in these reports, plans, programs or correspondence.		No AEMR for 2019-20 has been submitted at the time of this audit.		
2.5	Waste operations may only take place for 20 years from the commencement of operations on site. Note: Under this approval the Proponent is required to decommission the project upon the completion of waste operations, and rehabilitate the site to the satisfaction of the Director-General. Consequently, this approval will continue to apply in all other respects other than the right to conduct waste operations on site until the site has been rehabilitated to a satisfactory standard.	Site interview; Site plaque	Compliance with the condition has been demonstrated. SAWT operations commenced on 25 March 2009.		Compliant
2.6	With the approval of the Director-General, the Proponent may submit any management plan or monitoring program required by this approval on a progressive basis. 6a. Within 3 months of any modification approval, the Proponent must prepare and implement a revised version of any relevant management plan or monitoring program to the satisfaction of the Director General.	Site interview; SUEZ correspondence to DPIE, dated 04/07/2019; DPIE correspondence to SUEZ, dated 29/11/2019; DPIE Major Projects Website	Compliance with the condition has been demonstrated. EMP originally submitted on 29/04/2009 and approved by DPIE on 30/04/2009. EMP not being submitted on a progressive basis. The last modification to the project approval, Mod 3 - Maturation Pad Upgrades, was determined in 2014. DPIE last approved the EMP on 29/11/2019. NO modifications to the project approval have been determined during the audit period.		Compliant
2.7	The Proponent shall ensure that any new buildings and structures, and any alterations	N/A	During the audit period there have been no new buildings and structures, or any		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p>Notes:</p> <ul style="list-style-type: none"> • Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for any building works. • Part 8 of the EP&A Regulation sets out the detailed requirements for the certification of project. 		alterations or additions to any existing buildings and structures.		
2.8	The Proponent shall ensure that all demolition work is carried out in accordance with AS 2601-2001: The Demolition of Structures, or its latest version.	N/A	During the audit period there has been no demolition work.		Not triggered
2.9	The Proponent shall ensure that the plant and equipment used on site, or in connection with the project, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Site interview; Site observation;	<p>Compliance with the condition has been demonstrated.</p> <p>Maintenance of all plant/equipment is recorded in a register.</p>		Compliant
2.10	The Proponent shall ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this approval removes the obligation for the Proponent to obtain, renew or comply with	Site interview; AEMR 2017-18; AEMR 2018-19; EMP; Legislative and Other Requirements Procedure; Legislative Register – Environmental; SAWT Kemp Creek Training Register	<p>Compliance with the condition has been demonstrated.</p> <p>The necessary permits and licences for the development are initially identified in the environmental impact statements prepared for the development (or any subsequent modification). SUEZ has a legislation procedure which guides the</p>		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	such licences, permits or approval/consents.		reader through the necessary legislation requirements for their different facility types. SUEZ maintains a legislative register which highlights all the necessary permits, licences and approvals. SUEZ includes legislation updates and information for the appropriate/relevant employees in the training register and on the office noticeboard.		Compliant
3.1	The Proponent shall not receive: more than: • 120,000 tonnes of mixed waste and garden waste a year on site; and • 14,400 tonnes of biosolids from sewage treatment plants; and waste on site that is: • contaminated by chemicals and/or pathogens that would not be rendered harmless by operations on site, or that may constitute a health or environmental risk, including clinical and related waste and diseased carcasses; and • classified as hazardous waste or industrial wastes under the Protection of the Environment (Operations) Act 1997.	Mandalay volume reports for the audit report period.	Compliance with the condition has been demonstrated. Part 2018: 110,990.30t of general solid waste; All 2019: 104,842.62t of general solid waste; Part 2020: 58,873.98t of general solid waste		
3.2	The Proponent shall: (a) implement suitable procedures to: • ensure that the site does not accept wastes that are prohibited; and	Site interview; Site observation; Mandalay reports; Environment Management Plan; SAWT Training Register	Compliance with the condition has been demonstrated. The EMP includes procedures and process for accepting waste. SUEZ track incoming		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<ul style="list-style-type: none"> • screen incoming waste loads; and (b) ensure that: <ul style="list-style-type: none"> • all waste sludges and wastes that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; and • staff receive adequate training in order to be able to recognise and handle any hazardous or other unapproved waste. 		<p>and outgoing waste using a system called "Mandalay". The system tracks the source, volume, classification, vehicle and other appropriate information. All incoming loads are screened by operators at the weighbridge. SUEZ staff demonstrated a strong understanding of waste classification. The SAWT Training Register demonstrates all the training every staff member has completed; the list of training includes several environmental modules as well as other operation process and procedure modules.</p>		Compliant
3.3	<p>Except for the following, the Proponent shall dispose of all outputs produced on site to suitably licensed facility:</p> <ul style="list-style-type: none"> (a) recyclables extracted and delivered off-site for resource recovery purposes; and (b) compost output products approved for use under the POEO Act and Regulations; or (c) compost output products for approved public compost applications off SITA's land that: <ul style="list-style-type: none"> • have been composted in accordance with Australian Standard AS 4454-2003:Composts, Soil Conditioners and Mulches; • comply with the limits for physical contaminants set out 	<p>Mandalay volume reports for the audit report period; Site interview; Site observations</p>	<p>Compliance with the condition has been demonstrated.</p> <p>All outgoing waste volumes have been classified and tracked in Mandalay. During the site interview it was explained that after all recoverable wastes have been separated, the remaining waste is being composted within the composting tunnels (no external composting) and transported to Kemp Creek landfill due to the revocation of the mixed waste order 2014.</p>		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>in Table 3.1 of Australian Standard AS 4454-2003 Composts, Soil Conditioners and Mulches; and</p> <ul style="list-style-type: none"> • comply with the chemical acceptance concentration thresholds for Restricted Use (Grade A) in the NSW Environmental Guidelines: Use and Disposal of Biosolid Products (1997); or (d) compost output products for land rehabilitation, namely mine site rehabilitation and landfill site rehabilitation, that: • have been composted in accordance with Australian Standard AS 4454-2003:Composts, Soil Conditioners and Mulches; • comply with the limits for physical contaminants set out in Table 3.1 of Australian Standard AS 4454-2003 Composts, Soil Conditioners and Mulches; and • comply with the chemical acceptance concentration thresholds for Restricted Use (Grade B and C) in the NSW Environmental Guidelines: Use and Disposal of Biosolid Products (1997). 				Compliant
3.4	<p>Within 3 years of commissioning the plant on site, or as directed by the Director-General, the Proponent shall:</p> <p>(a) review the criteria in condition 3(c) and 3(d) above in consultation with the EPA with</p>	<p>Site interview; Site observation</p>	<p>Compliance with the condition has been demonstrated.</p> <p>Since the revocation of the mixed waste order 2014 composted mixed waste is disposed at Kemps Creek landfill.</p>		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	a view to moving to approved criteria under the POEO Act and Regulations or establishing criteria that are specifically appropriate for an identified intended use; and (b) comply with any revised criteria set under the POEO Act and Regulations or by the Director-general				
3.5	The Proponent shall prepare and implement a Waste Monitoring Program for the project to the satisfaction of the Director-General, prior to the commencement of operation. This program must: (a) be prepared in consultation with EPA by a suitably qualified and experienced expert; and (b) include a suitable program to monitor the: • quantity, type and source of waste received on site; • quantity, type and quality of the outputs produced on site; and (c) outline contingency measures that would be implemented in the event that levels of foreign matter or contaminants in the compost output exceed acceptable levels.	Mandalay report; SAWT Kemps Creek Product Quality Manual; SUEZ correspondence to DPIE, dated 20/06/2018; SUEZ correspondence to DPIE, dated 21/02/2019; EMP (revision 4)	Compliance with this condition has not been demonstrated. The product quality manual prepared for SAWT Kemps Creek would be sufficient to address the monitoring objectives of this condition, but there is no evidence of the EPA having been consulted in the preparation of this document nor is there evidence of DPIE approving this document. The current version of the EMP does not address the monitoring objectives of this condition.	Consult with EPA on the waste monitoring requirements from the product quality manual, document this consultation and the monitoring requirements in the EMP.	Non-compliant
3.6	The Proponent shall ensure that the project complies with Section 129 of the Protection of the Environment Operations Act, 1997. Notes: • Section 129 of the Protection	EPL 12889; EMP; Odour Management Plan (OMP); Site interviews; Site observations; Daily odour checklists	Compliance with this condition has been demonstrated. EPL 12889 does not identify emissions as being potentially offensive. Between the period April 2018		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	of the Environment Operations Act 1997, provides that the Proponent must not cause or permit the emission of any offensive odour from the site, but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.		to May 2019, 23 odour complaints were lodged. SUEZ responded to all EPA requests for information in response to the complaints; none of these complaints resulted in a 'show cause' letter or any other enforcement actions. No odour complaints have been lodged since May 2019. The development currently implements all identified controls and mitigation measures from the Odour Management Plan to minimise potential odour impacts: no material was on the maturation pad at the time of site inspection; biofilters were operational and exhaust air was being passed through; all waste was being delivered in the receival hall and receival hall doors were operational; the odour fences were operational; aerators in all dams were operational; pre-refining trommel has been decommissioned; daily odour monitoring checklists are being completed.		Compliant
3.7	The project must be built and operated to minimise odours. This must include: (a) all composting must be undertaken within enclosed tunnels; (b) composting must be undertaken for set periods of time and at certain	Site interview; Site observation	Compliance with this condition has been demonstrated. Composting was observed to be within enclosed tunnels and confirmed by site representatives to be in line with temperature, oxygen and moisture levels.		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	temperatures, oxygen and moisture levels so that the composted material has been fermented properly and is adequately stabilised prior to any outdoor storage of the composted material; (c) all exhaust air from the composting building and from the composting tunnels must pass through the biofilters; (d) the biofilters are to be of a deep bed design and must have vented roofs; and (e) a system of two leachate ponds must be used on site, to minimise the surface area of odorous leachate.		Exhaust air was being transported to the biofilters (vents pipes were being maintained and replaced). No structural or operational changes have been made to the biofilters (vented roofs were observed). Leachate ponds and all aerators were observed to be operating.		Compliant
3.8	For the life of the project, the Proponent shall ensure that there is a suitable meteorological station in the vicinity of the site that complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline.	Site interview; Weather station export	Compliance with this condition has been demonstrated. The weather station was observed from a distance as it was stated to be in the Kemps Creek landfill area. An export of weather data from the station has been provided.		
3.9	The facility is to be maintained in a condition which minimises and prevents the emission of dust from the site.	Site observation; Complaints register	Compliance with this condition has been demonstrated. No dust was observed during the site inspection. All roller doors to the receival hall were closed, except when a delivery vehicle was reversing to deliver a load. No sources of dust were observed during the site inspection. Using FORM026, weekly inspections are conducted to ensure compliance is		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
			achieved. No dust complaints have been recorded during the audit period.		Compliant
3.10	The Proponent must ensure that all composting is undertaken in accordance with Australian Standard AS 4454-2003: Composts, Soil Conditioners and Mulches, Appendix N, Best practice guidelines for Composting Systems, or other practices approved by the EPA.	Product Quality Manual	<p>Compliance with this condition has been demonstrated.</p> <p>The product quality manual for SAWT Kemps Creek has been prepared to ensure compliance with: Department of Primary Industries Compliance Agreement: CA-05 Bio-secure transport and treatment of host plant material destined for recycling or waste. The organic outputs derived from mixed waste order 2014 (also referred to as General Exemption). NSW EPA General resource recovery orders where applicable: Compost and Pasteurized garden organics.</p>		
3.11	The Proponent is required to prepare a feasibility report for the Director-General's approval within 5 years of this approval, outlining options to capture and use greenhouse gas in the generation of electricity. The report must identify which options could be reasonably and feasibly implemented.	SUEZ correspondence to DPIE, dated 21/02/2019; SUEZ correspondence to DPIE, dated 04/07/2019; AEMR 2018-19;	<p>Compliance with this condition has not been demonstrated.</p> <p>SUEZ has not prepared and submitted a feasibility report for DPIE approval. SUEZ has sought clarification from DPIE on this condition but no responses from DPIE to SUEZ's request for clarification were provided. It is noted that AEMR 2018-19 identified an action for SUEZ to seek a modification to the project approval to remove this condition because the</p>	Prepare and submit a modification to remove the condition about the feasibility report.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
			development cannot comply with the requirement.		
3.12	The Proponent shall comply with the operating hours in Table 1. (See Sheet "T1 - AWET Site Operation Hours")	Mandalay reports; Site interview	<p>Compliance with this condition has been demonstrated.</p> <p>The Mandalay reports show incoming and outgoing time entries. There are several instances where waste appears to have received or despatched outside the operating hours stipulated in Table 1. These instances were clarified by SUEZ, with the explanation for the recorded time being some loads are manually captured by the landfill weighbridge, with the SAWT facility capturing the correct time in the load description. On review of the records this explanation was demonstrated to be accurate.</p>		Compliant
3.13	The Proponent shall ensure that noise from operation of the project does not exceed the noise limits presented in Table 2. (See sheet "T2 - Project Noise limits")	Environmental noise compliance report	<p>Compliance with this condition has been demonstrated.</p> <p>A noise assessment was completed in August 2018 to determine the development's compliance against noise limits in the EPL and development consent. The noise report indicates the site is compliant with the conditions of the EPL and development consent. It is noted that the pre-refining trommel is no longer utilised since the MWOO revocation.</p>		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
3.14	The Proponent shall prepare and implement a Construction Noise Management Protocol for the project to the satisfaction of the Director-General. The plan shall be submitted to the Director-general prior to commencing demolition and construction, and must: a) identify specific activities to be carried out, the noise generation from these activities and timetabling of the activities; b) identify appropriate construction noise limits; c) identify all reasonable and feasible mitigation measures that would be implemented to minimise noise; d) describe monitoring methods and program to ensure noise levels are limited; e) include procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity, and procedures for managing complaints; and f) identify site contact person to manage and follow up complaints.	N/A	Not triggered No construction.		Not triggered
3.15	Prior to the commencement of operation, the Proponent shall install noise mitigation at the Caretakers Residence for 1669A Elizabeth Drive, as agreed by the owner of the property. The Proponent shall notify the Director General	N/A	Not triggered. SAWT operations commenced on 25 March 2009.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	once installation of the noise mitigation is completed.				
3.16	The Proponent shall prepare and implement a Noise Monitoring Program for the project, to the satisfaction of the EPA and the Director-General. The Noise Monitoring Program shall be submitted to the Director-General prior to commencing operation and must include a noise monitoring protocol for evaluating compliance with the project noise limits in Table 1. (Error here - should read Table 2)	Site interview; SUEZ correspondence to DPIE, dated 04/07/2019; DPIE correspondence to SUEZ, dated 29/11/2019;	<p>Compliance with the condition has been demonstrated.</p> <p>EMP originally submitted on 29/04/2009 and approved by DPIE on 30/04/2009. No noise complaints have been recorded during the audit period.</p>		Compliant
3.17	Except as may be expressly provided in an EPL for the project, the Proponent shall comply with section 120 of the Protection of the Environment Operations Act 1997.	EPL 12889	<p>Compliance with this condition has been demonstrated.</p> <p>There is only one licensed discharge point and this is a stormwater discharge (Point 1). The following discharges from the site have been identified by SUEZ:</p> <ol style="list-style-type: none"> 1. A discharge from the leachate overflow dam on 10/02/2020 following a 1:10 year rain event. SUEZ identified this as a pollution incident as this is no longer a licensed discharge point, implemented the site PIRMP and provided additional evidence and sampling results to the EPA. The EPA has not taken any action in response to this event. 2. A wet weather discharges from Point 1 from 10- 		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
			<p>11/08/2020 did not meet the discharge requirements, with ammonia and total suspended solids exceeding the limits. EPA was notified and provided additional evidence and sampling results.</p> <p>In both instances SUEZ has followed the pollution incident notification process and the EPA has been provided the circumstances of the discharge and analytical results. On the basis SUEZ has followed acceptable incident notification processes, and the discharges were a consequence of high rainfall events, SUEZ is considered to have taken all reasonable and feasible steps to mitigate the discharge events.</p>		Compliant
3.18	Outdoor areas where compost products or organic outputs are stored must have a leachate barrier system in the form of clay or modified soil liner (or equivalent) consisting of at least 600mm of recompact clay with an in-situ permeability (K) of less than 10 ⁻⁷ m/s.	Site observation	<p>Compliance with this condition has been demonstrated.</p> <p>Composted products are no longer stored in the outside maturation pads; all composting is internal. SUEZ states the leachate barriers for the maturation pads are constructed and in compliance with the specific requirements.</p>		
3.19	The Proponent shall ensure that all above ground tanks and vats, including those used for treating or processing wastewater and leachate and diesel storage, must be	Site interview; Site observation; Quantity estimates for leachate pond construction; EMP	<p>Compliance with this condition has been demonstrated.</p> <p>Design specifications for the sediment and leachate pond identify the requirement for</p>		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	surrounded by a bund with a capacity to contain 110% of the tanks within the bund. These bunds shall be designed and installed in accordance with the requirements of all relevant Australian Standards, and/or EPA's Environmental Protection Manual Technical Bulletin Bunding and Spill Management.		HDPE geomembrane and clay. Diesel tanks are self-bunded to hold 110% capacity.		
3.20	The Proponent shall prepare and implement a Soil, Water and Leachate Management Plan for the project to the satisfaction of the Director-General. This plan must: (a) be submitted to the Director-General for approval prior to carrying out any development on site; (b) be prepared by a suitably qualified and experienced expert; (c) be prepared in consultation with the EPA, NOW and Council; and (d) include: • a site water balance; • an erosion and sediment control plan; • a stormwater management scheme; • a surface water, groundwater and leachate monitoring program; and • a surface water, groundwater and leachate response plan.	Site interview; SUEZ correspondence to DPIE, dated 04/07/2019; DPIE correspondence to SUEZ, dated 29/11/2019;	Compliance with the condition has not been demonstrated. EMP which was originally submitted on 29/04/2009 and approved by DPIE on 30/04/2009, included a soil, water and leachate management plan. The EMP was updated following the last independent environment audit and approved by DPIE on 29/11/2019. The plan however does not identify who prepared this plan (i.e. suitably qualified and experienced expert) and there is no evidence of EPA, NOW or Council having been consulted in the preparation.	Evidence of consulting EPA, DPI Water and Council regarding the Soil, Water and Leachate Management Plan should be included. If this evidence is not available, these stakeholders should be provided an opportunity to comment on the current plan, to the plan should be updated and SUEZ attempts at consultation should be documented.	Non-compliant
3.21	The site water balance must: (a) identify the source of all water collected or stored on the	EMP	Compliance with the condition has been demonstrated.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	site, including rainfall and stormwater; and (b) include details of all water use on site and any discharges.		The EMP includes a site water balance and the EMP was approved by DPIE on 30/04/2009.		Compliant
3.22	The erosion and sediment control plan must: (a) be consistent with the requirements in the latest version of Managing Urban Stormwater: Soils and Construction (Landcom); (b) identify the activities on site that could cause soil erosion and generate sediment; and (c) describe what measures would be implemented to: • minimise soil erosion and the transport of sediment to downstream waters, including the location, function and capacity of any erosion and sediment control structures; and • maintain these structures over time.	EMP	Compliance with the condition has been demonstrated. Section 4.10 of the EMP includes a soil erosion and sediment control plan and the EMP was approved by DPIE on 30/04/2009. PCC highlighted sediment issues on Elizabeth Drive from dirt tracking. It was explained by PCC that when SAWT vehicles depart site they traverse the same route that landfill vehicles traverse and any material the landfill vehicles deposit on the route could be picked up by SAWT vehicles and deposited on the road. This issue was investigated by the auditor, and whilst SAWT is not considered to have breached any conditions or been responsible for a pollution incident, some improvement opportunities exist that SAWT should consider.	Improvement opportunity: Review ESCP and include potential indirect activities (e.g. indirect dirt tracking), how SAWT could coordinate controls with the landfill and some additional mitigation measures.	
3.23	The stormwater management scheme must: (a) be consistent with the guidance in the latest version of Managing Urban Stormwater: Council Handbook (EPA); and (b) have sufficient capacity to cater for the 90th percentile 5 day rainfall event.	Site interview; Site observations; EMP	Compliance with this condition has not been demonstrated. The stormwater management system included in the EMP does not demonstrate how the scheme is consistent with Managing Urban Stormwater: Council Handbook (EPA) nor	The stormwater management scheme needs to demonstrate (1) compliance with Managing Urban Stormwater: Council Handbook (EPA) and (2) that the system has capacity to handle the 90th percentile 5 day rainfall event.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
			does the scheme demonstrate how the system has sufficient capacity for the 90th percentile 5-day rainfall event.		
3.24	The surface water, groundwater, and leachate monitoring program must: (a) be generally consistent with the guidance in EPA's Environmental Guidelines for Composting & Related Organics Processing Facilities; and (b) include: • baseline data; • details of the proposed monitoring network; and • the parameters for testing and respective trigger levels for action under the surface water, groundwater and leachate response plan (see below).	EMP; Water quality monitoring results; Site interview	Compliance with this condition has not been demonstrated. The EMP (July 2020) does not include a groundwater monitoring program or baseline data.	The EMP needs to be updated to include a groundwater monitoring program and baseline data; or the condition should be modified and the need for groundwater monitoring removed.	Non-compliant
3.25	The surface water, groundwater and leachate response plan must: (a) include a protocol for the investigation, notification and mitigation of any exceedances of the respective trigger levels; and (b) describe the array of measures that could be implemented to respond to any surface or groundwater contamination that may be caused by the development.	EMP; Site interview	Compliance with this condition has not been demonstrated. The EMP (July 2020) does not include a groundwater response plan, investigation and notification procedures as well as how to respond to surface or groundwater contamination.	The EMP needs to be updated to include surface water, groundwater and leachate response plan that meets the requirements of this condition.	Non-compliant
3.26	The area between the internal road along the western boundary and Badgerys Creek as outlined in Appendix 2, is to	Subcontractor invoice; Site interview; Site observation	Compliance with this condition has been demonstrated. This area is outside the fenced operational area and		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	be protected and rehabilitated as a riparian corridor.		protected from disturbance. There is some evidence of vegetation maintenance having been undertaken and an invoice for works completed in 2018 by a bushland regeneration contractor was provided. It is not clear what the current program of work is: the VMP available is dated and there appears to be no monitoring or reporting of this offset area.		Compliant
3.27	The Proponent shall prepare a Vegetation Management Plan for the site, in consultation with NOW. This Plan shall be submitted and approved by the Director-General, prior to the commencement of construction. The Vegetation Management Plan shall: (a) be prepared in accordance with NOW's How to Prepare a Vegetation Management Plan Guideline; (b) include a detailed plan to protect and rehabilitate the Badgerys Creek riparian corridor onsite; (c) provide details of the on-site revegetation program to offset clearing of 0.81 hectares of Cumberland Plain Woodland; and (d) outline the weed management program to be implemented on-site.	Site interview; VMP; AEMR 2018-19	Compliance with this condition has been demonstrated. A vegetation management plan (VMP) was prepared in 2008, prior to construction commencing, in consultation with the applicable regulatory authorities. This VMP was applicable for a 10 year period, up to 8 September 2016. SUEZ informed the auditor the VMP is currently being reviewed.		
3.28	The Proponent shall monitor the performance of the intersection of Elizabeth Drive	N/A	Not triggered. This requirement does not		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	and the landfill access road within two years of the commencement of operations, or as otherwise required by the Director-General. In the event that the performance of the intersection is found to be at LOS D or worse as a result of traffic from the landfill and AWT, the Proponent shall implement mitigation measures, as recommended by the RMS.		pertain to the audit period and SUEZ has not provided correspondence from DPIE that requires the monitoring of this intersection. It is noted significant development is currently underway in this region, and any performance of intersections in this region will have been considered.		
3.29	The Proponent shall ensure that all external lighting associated with the development: (a) does not create a nuisance to surrounding properties or roadways; and (b) complies with AS 4282(INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting.	Site interviews; Site observations; Structural drawings	Compliance with this condition has been demonstrated. No complaints regarding light spill have been recorded. External light fixtures observed during the inspection was directed down and is not anticipated to cause light spill.		Compliant
3.30	Upon the cessation of waste operations, the Proponent shall decommission the project and rehabilitate the site to the satisfaction of the Director-General.	N/A	Not triggered.		Not triggered
3.31	The Proponent shall prepare and implement a Rehabilitation and Closure Plan for the project to the satisfaction of the Director-General. This plan must be: (a) be prepared in consultation with EPA, and Council by a suitably qualified and experienced expert whose appointment has been approved by the Director-	N/A	Not triggered.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>General;</p> <p>(b) be submitted to the Director-General for approval no more than one year after the sixth independent environmental audit of the project (see schedule 4), or as directed otherwise by the Director-General;</p> <p>(c) define the objectives and criteria for rehabilitation and closure;</p> <p>(d) investigate options for the future use of the site;</p> <p>(e) describe the measures that would be implemented to achieve the specified objectives and criteria for rehabilitation and closure;</p> <p>(f) calculate the cost of implementing these measures; and</p> <p>(g) describe how the performance of these measures would be monitored over time.</p>				
4.1	<p>The Proponent shall prepare and implement an Environmental Management Plan for the project to the satisfaction of the Director-General. This plan must:</p> <p>(a) be prepared in consultation with the EPA by a suitably qualified and experienced expert;</p> <p>(b) be submitted to the Director-General for approval prior to commencement of operations;</p> <p>(c) describe in detail the</p>	<p>EMP;</p> <p>SUEZ correspondence to DPIE, dated 04/07/2019;</p> <p>DPIE correspondence to SUEZ, dated 29/11/2019;</p>	<p>Compliance with this condition has been demonstrated.</p> <p>EMP originally submitted on 29/04/2009 and approved by DPIE on 30/04/2009. The version of the EMP provided for the audit is dated 31/07/2020.</p>	<p>SUEZ should seek DPIE endorsement of the latest version of the plan.</p>	Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>management measures that would be implemented to address: the relevant matters referred to in Section 4 and Appendix B of the EPA's Environmental Guidelines for Composting & Related Organics Processing Facilities; and</p> <p>the conditions of this approval;</p> <p>(d) include a copy of:</p> <ul style="list-style-type: none"> • the management plans and monitoring programs required in this approval; • a quality assurance program for the design and installation of the leachate management system has been developed in accordance with Australian Standard AS 3905.2; <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; and • respond to emergencies; and <p>(f) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project.</p>				
4.2	Prior to carrying out any development on site, and then	N/A	Not triggered.		Not triggered

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	operations, the Proponent shall certify in writing to the Director-General that it has complied with all the relevant conditions of this approval.				
4.3	Within 24 hours of detecting an exceedance of the limits/performance criteria in this approval, or the occurrence of an incident that causes (or may cause) harm to the environment, the Proponent shall notify the Department and EPA of the exceedance/incident.	Site interview; Email correspondence; Incident report	<p>Compliance with this condition has not been demonstrated.</p> <p>SUEZ notified EPA of a pollution incident on 10/02/2020 and only notified DPIE on 4/11/2020. Similarly, one wet weather discharge during the audit period recorded an exceedance of water quality criteria but DPIE was not notified.</p>	Hold an environmental workshop with mandatory attendance by all SAWT employees to identify and explain all environmental commitments of both the EPL and development consent.	Non-compliant
4.4	Within 6 days of notifying the Department and EPA, the Proponent shall provide a written report to the Department and EPA that: (a) describes the date, time, and nature of the incident; (b) identifies the cause, or likely cause, of the incident; and (c) describes what action has been taken to date address the incident, and what actions are proposed to be implemented in the future to either address the consequences of the incident or avoid a recurrence of the incident.	EPA Report - Reference Number C01890-2020; CAR summary; Email correspondence; Incident report	<p>Compliance with this condition has not been demonstrated.</p> <p>The written report to EPA for an incident notified on 10/02/2020 is dated 17/02/2020 and email correspondence provided by SUEZ demonstrates this report was submitted within required notification period. A written report was provided to DPIE on 4/11/2020, outside the required notification period.</p>	<p>Submit a copy of the historical incident report to DPIE.</p> <p>Hold an environmental workshop with mandatory attendance by all SAWT employees to identify and explain all environmental commitments of both the EPL and development consent.</p>	Non-compliant
4.5	Every year from the date of this approval, unless the Director-General agrees otherwise, the Proponent shall submit an AEMR to the Director-General and relevant agencies. The	AEMR 2017-18 AEMR 2018-19 DPIE correspondence 08/07/2020	<p>Compliance with this condition has not been demonstrated.</p> <p>MP06_0185 was determined on 16/04/2008, therefore AEMR should be due every</p>	Inform DPIE of the late submission of the AEMR and request an extension of time.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>AEMR shall:</p> <ul style="list-style-type: none"> (a) identify the standards and performance measures that apply to the development; (b) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; (c) include a summary of the monitoring results for the development during the past year; (d) include an analysis of these monitoring results against the relevant: <ul style="list-style-type: none"> • impact assessment criteria; • monitoring results from previous years; and • predictions in the EA; (e) identify any trends in the monitoring results over the life of the development; (f) identify any non-compliance during the previous year; and (g) describe what actions were, or are being taken to ensure compliance. 		<p>April. However, correspondence from DPIE dated 08/07/2020 acknowledged the annual reporting period ending on 29/07 every year and instructed AEMR's to be submitted within 3 months of the end of this reporting period (i.e. 29/10 every year).</p> <p>AEMR 2017-18 covered the period 29/07/2017 to 29/07/2018 and was finalised on 20/11/2019.</p> <p>AEMR 2018-19 covered the period 29/07/2018 to 29/07/2019, was finalised on 27/04/2020 and submitted to DPIE on 25 May 2020.</p> <p>AEMR 2019-20 should cover the period 29/07/2019 to 29/07/2020 and is overdue.</p>		
4.6	The Proponent is to implement continuous improvement in regard to odour emission management. As part of this, the Proponent is to submit a report annually to the Department and the EPA, unless otherwise agreed by the Director-General, outlining new developments in the field of odour control and management relevant to the operation, and detailing practices that have	Site interview; OMP; AEMR 2017-18; AEMR 2018-19;	<p>Compliance with this condition has not been demonstrated.</p> <p>The AEMR include a section on odour monitoring (s6.6), however the information included does not meet the requirements of this condition.</p> <p>The OMP states continuous improvement must be reported annually to DPIE, and this is to be in accordance with "Environmental auditing</p>	Update either the EMP or the OMP to clearly capture the annual reporting need and requirements of this condition.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	been implemented on the site during the previous year, to reduce odour emissions. The report must identify which practices can be implemented in a cost-effective manner and justify why the remainder are not required		and review" in the EMP (s1.10). The EMP, s1.10, states a continuous improvement report must be prepared but doesn't state the frequency or what this report must address. A Continuous Improvement Report for 2017 was submitted to DPIE in June 2018. No previous or subsequent report has been provided.		
4.7	Within 2 years of the commencement of operations, and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must: (a) be carried out by a suitably qualified, experienced and independent audit team containing a waste management specialist, whose appointment has been endorsed by the Director-general; (b) include consultation with EPA; (c) assess the environmental performance of the project, and its effects on the surrounding environment; (d) determine whether the project is complying with the relevant standards, performance measures and	Independent Environment Audit No.2 (July 2014 to 21 March 2018)	Compliance with this condition has been demonstrated. The audit was carried out by a suitably qualified and independent team endorsed by DPIE. Consulted with the EPA. Assessed the environmental performance of the development, determined compliance and included recommendations to improve performance and compliance.		Compliant

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
	<p>statutory requirements;</p> <p>(e) review the adequacy of the Environmental Management Plan for the project, compliance with the requirements of this approval, and any other licences and approvals; and, if necessary,</p> <p>(f) recommend measures or actions to improve the environmental performance of the project, and/or any plan/program required under this approval.</p>				Compliant
4.8	<p>Within 3 months of commissioning this audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General, with a response to any recommendations contained in the audit report.</p>	<p>CAR summary; Independent Environment Audit No.2 (July 2014 to 21 March 2018) SUEZ correspondence dated 31/07/2018</p>	<p>Compliance with this condition is not demonstrated.</p> <p>The previous audit commenced in March 2018 with the site inspection, and the audit was submitted to DPIE on 14/5/2018 after a short extension request. DPIE responded in July 2018 requesting amendments to the IEA, to which SUEZ requested an extension of time. DPIE granted an extension of time to 31/8/2018. Subsequent correspondence between SUEZ and DPIE demonstrates the IEA was submitted and updates regarding corrective actions.</p> <p>SUEZ requested an extension of time on 9/5/2018, 31/07/2018, 4 months after the audit commenced. No evidence of DPIE granting an extension has been provided.</p>		

Approval (ID)	Requirement	Evidence collected	Findings	Recommendations	Compliance status
4.9	Within 3 months of submitting a copy of the audit report to the Director-General, the Proponent shall review and if necessary, revise the plans/programs required under this approval to the satisfaction of the Director-General.	DPIE correspondence, dated 29/11/2019	<p>Compliance with this condition has been demonstrated.</p> <p>A letter from DPIE dated 29/11/2029 refers to an email dated 31/10/2019 requesting approval of the EMP and OMP. The version of these plans is not stated in the correspondence.</p>		Compliant
4.10	<p>Within 1 month of the approval of any plan or program required under this consent, or the completion of any independent audit or AEMR required under this approval, the Proponent shall:</p> <p>(a) ensure that a copy of the relevant documents is made publicly available on the Proponent's website; and</p> <p>(b) provide a copy of the relevant document/s to any interested party upon request.</p>	https://www.suez.com.au/en-au/who-we-are/suez-in-australia-and-new-zealand/environmental-reporting-australia/kemps-creek-sawt	<p>Compliance with this condition is not demonstrated.</p> <p>The website as accessed on 21 October 2020 did not have the following documents:</p> <p>1. First Independent environment audit, 2011;</p>	Upload the first audit.	Non-compliant

APPENDIX B

PLANNING SECRETARY AUDIT
TEAM AGREEMENT

Kelly Gee
Project Manager
SUEZ Recycling & Recovery Pty Ltd
Level 4, 3 Rider Blvd
Rhodes, NSW 2138

17 September 2020

Dear Ms Gee

**SUEZ Kemps Creek Waste Facility (MP06_0185)
2020 Independent Environmental Audit- Audit team approval**

I refer to your request (MP06_0185-PA-2) for the Secretary's approval of suitably qualified persons to prepare the 2020 Independent Environmental Audit for the SUEZ Kemps Creek Waste Facility (MP06_0185).

In accordance with Schedule 4, Condition 7 of MP06_0185, as modified (**the 'Consent'**), the Secretary has agreed to the following audit team:

- Mr Darren Green as the lead auditor; and
- Mr Neville Hattingh as assistant auditor.

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 Schedule 4, Condition 7 of the Consent. The Department also recommends consideration be given to the *Independent Audit Post Approval Requirements* (Department 2020) to the extent that it does not contradict Schedule 4, Condition 7 of the Consent. Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits. Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you have any questions, please contact Alfarid Hussain on 02 9274 6456 or email compliance@planning.nsw.gov.au

Yours sincerely



Julia Pope
Team Leader Compliance Metro
As nominee of the Secretary

APPENDIX C

CONSULTATION

2 October 2020

Attention: Wayne Mitchell
Director: Development and regulatory services



Penrith City Council
601 High Street
Penrith
NSW 2750

PO Box 1563
Warriewood
NSW 2102

ABN 45 162 835 083

Email: council@penrith.city

Dear Wayne

Independent Environmental Audit of the SUEZ Advanced Waste Treatment facility

I am writing to inform you that I have been engaged by SUEZ Recycling and Recovery Pty Ltd (SUEZ), with the endorsement of the Planning Secretary, to independently audit the environmental performance of the Kemps Creek Advanced Waste Treatment facility at 1725 Elizabeth Drive, Kemps Creek.

The Advanced Waste Treatment facility operates under development consent number DA 06_0185 and the audit is intended to be carried out during the months of October and November 2020, in accordance with condition 7 of the consent. It is a requirement of condition 7 that the auditor consults with relevant agencies to obtain their input into the scope of the audit.

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

Given the scheduled duration of the audit, it would be appreciated if this information were provided before 16 October 2020.

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

Kind Regards

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

Darren Green
Associate

0418 969 624
darren@elementenvironment.com.au



Our reference: 9321566
Contact: Greg McCarthy
Telephone: (02) 4732 7808

21 October 2020

Mr Darren Green
Associate - Element Environment
darren@elementenvironment.com.au

Dear Mr Green,

Re: Audit of environmental performance of the SUEZ Advanced Waste Treatment facility at 1725 Elizabeth Drive, Kemps Creek

I refer to your request for confirmation of any complaints, or incidents Council has received, as well as any issues Council would like examined relating to the above development.

Council's Compliance Team has not carried out any recent investigations into the operations being carried out on the property.

However, Compliance have observed mud tracking from the premises (as recently as October 2020), which can be seen via aerial images. These have been observed during wet weather events. The tracking extends from the facility and all the way onto Elizabeth Drive where sediment has built up and is entering a water way. These are reported to the EPA as the ARA for these matters.

The SUEZ Kemps Creek facility (formerly SITA) was one of three facilities identified in a 2012-13 regional odour study instigated by the NSW EPA. This study was in response to significant community complaints about waste facility odours in the Western Sydney region at the time. As a result, SITA was required to implement additional site odour controls following the investigation.

In 2017, Council received a number of complaints about offensive odours from the community members in Erskine Park and St Clair areas. These were all referred to the EPA. Council understands that the EPA fined the SEUZ Resource and Recovery Facility \$15,000 for not meeting odour control requirements of their EPL and directed the facility to improve its odour controls.

In April 2019 Council also issued Suez Recycling and Recovery Pty Limited a Penalty Infringement Notice for failure to submit an annual Fire Safety Statement as required by Council's Notice dated 09 August 2018 and Order dated 30/10/2018. Council also issued a Show Cause letter dated 22 January 2019 in which the statement was still not submitted even with written assurances given.

In summary, Council would request that the audit incorporate a comprehensive review of all the conditions set out in the development consent (DA 06/0185), to



ensure that all aspects of the facilities operations are being carried out in accordance with the consent.
If you would like to discuss this matter further, please do not hesitate to contact me on (02) 4732 7808.

Yours Faithfully,

Greg McCarthy
Environmental Health and Compliance Manager

2 October 2020

Attention: Trevor Wilson
Operations Officer – Waste Compliance



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

PO Box 1563
Warriewood
NSW 2102

ABN 45 162 835 083

Email: Trevor.Wilson@epa.nsw.gov.au

Dear Trevor

Independent Environmental Audit of the SUEZ Advanced Waste Treatment facility

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Kind Regards

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Darren Green
Associate

0418 969 624
darren@elementenvironment.com.au

Independent Environmental Audit of the SUEZ Advanced Waste Treatment facility

Trevor Wilson <Trevor.Wilson@epa.nsw.gov.au>

Fri 16/10/2020 6:27 PM

To: Darren Green <darren@elementenvironment.com.au>

Cc: Louise Saunders <louise.saunders@suez.com>; Hollingshead, Mollie <mollie.hollingshead@suez.com>; PR146 <PR146@elementenvironment.com.au>; Neville Hattingh <neville@elementenvironment.com.au>; Damien Rose <Damien.Rose@epa.nsw.gov.au>; Stephanie Todd <Stephanie.Todd@epa.nsw.gov.au>

 2 attachments (224 KB)

PR146_IEA_Consultation-EPA.pdf; Licence No. 12889.pdf;

Hi Darren,

Thanks for your email regarding an audit of the environmental performance of the Kemps Creek Advanced Waste Treatment facility at 1725 Elizabeth Drive, Kemps Creek. SUEZ holds Environment Protection Licence No. 12889 (the Licence) for the facility at Kemps Creek. As such, all aspects of compliance with the Licence and relevant environmental legislation including the *Protection of the Environment Operations Act 1997* and its associated regulations should be considered.

In particular the following points should also be covered:

- check that there is adequate maintenance of the air extraction system and the biofilter system;
- outdoor areas that drain to stormwater are free from contaminants and debris associated with the AWT materials (to avoid the pollution of waters)
- check compliance with licence conditions O5.2 to O5.8 inclusive, O6.3, O7.2, O7.3, O7.4. See attached PDF copy of the licence.

You are also able to find information about the Licence and any regulatory action taken by the EPA on our public register at <https://www.epa.nsw.gov.au/licensing-and-regulation/public-registers>.

If you have any questions about this matter, please contact Stephanie Todd on (02) 9995 6929.

Trevor Wilson

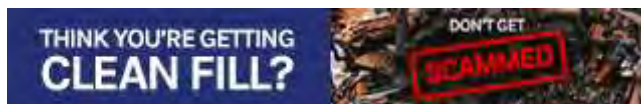
Unit Head

Metro South, NSW Environment Protection Authority

P: 02 9995 5646

waste.operations@epa.nsw.gov.au www.epa.nsw.gov.au  @NSW_EPA  EPA YouTube

Report pollution and environmental incidents on 131 555 (NSW only) or +61 2 9995 5555



I acknowledge and respect the Traditional Custodians of the land on which I work and live.

From: Darren Green <darren@elementenvironment.com.au>

Sent: Friday, 2 October 2020 1:19 PM

To: Trevor Wilson <Trevor.Wilson@epa.nsw.gov.au>

Cc: Louise Saunders <louise.saunders@suez.com>; Hollingshead, Mollie <mollie.hollingshead@suez.com>;

Neville Hattingh <neville@elementenvironment.com.au>; PR146 <PR146@elementenvironment.com.au>

Subject: Independent Environmental Audit of the SUEZ Advanced Waste Treatment facility

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

Regards,

Darren Green

Associate

0418 969 624



SYDNEY NEWCASTLE CENTRAL COAST MACKAY

elementenvironment.com.au

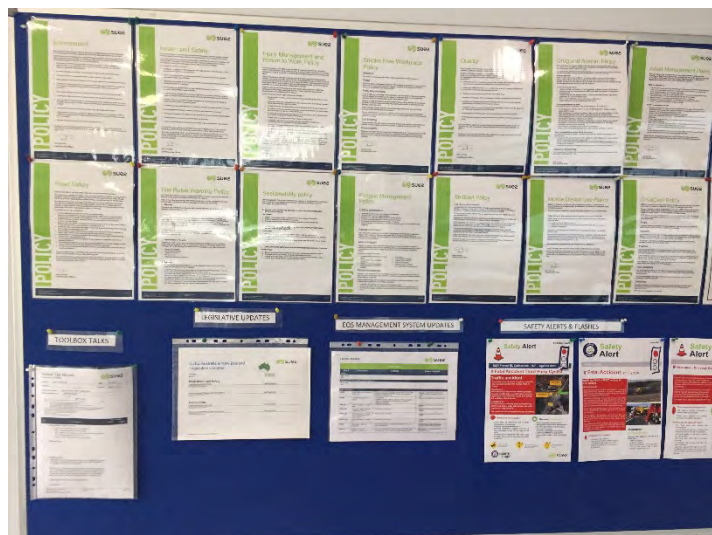
This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately. Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

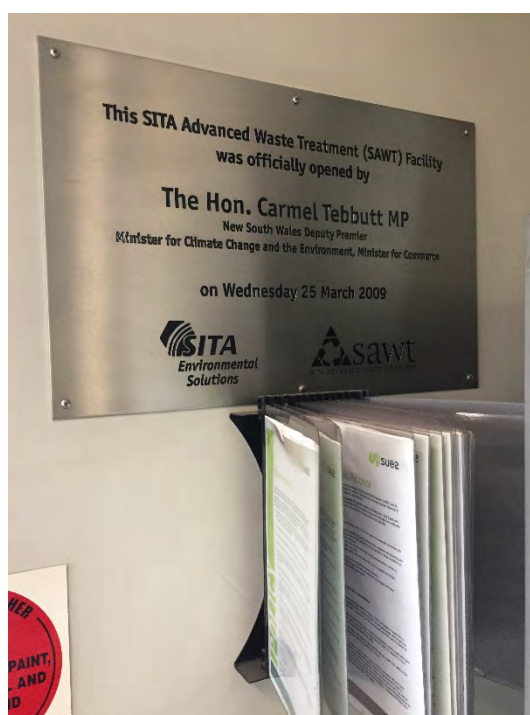
PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

APPENDIX D

SITE PHOTOGRAPHS



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Photograph 4.2: 20201019_213049149_iOS



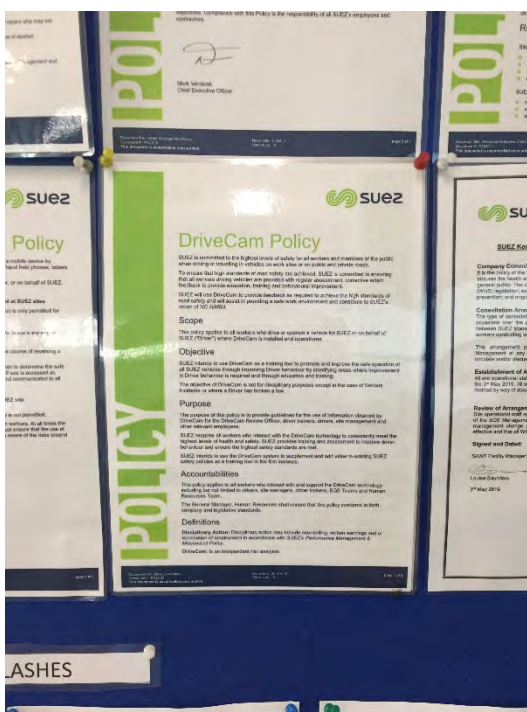
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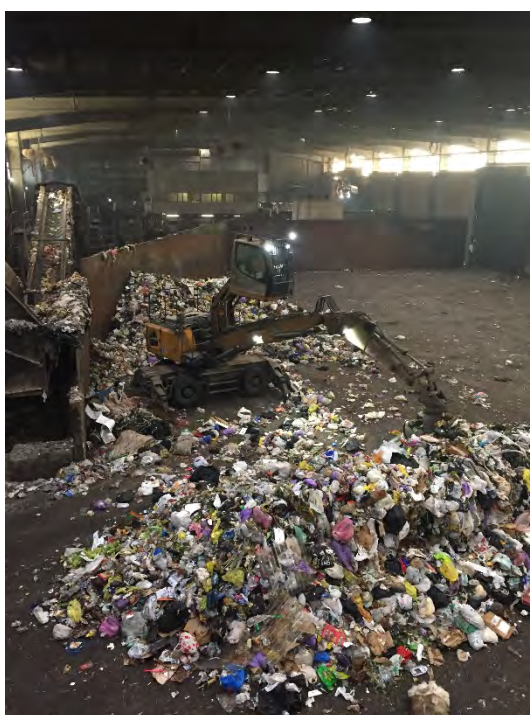
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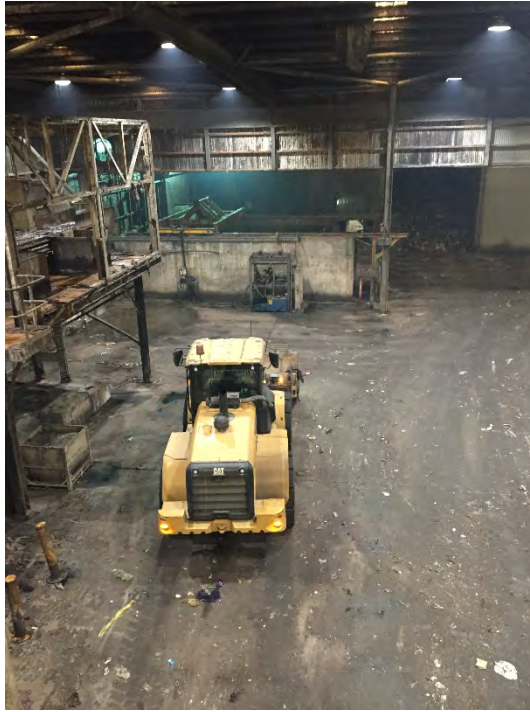
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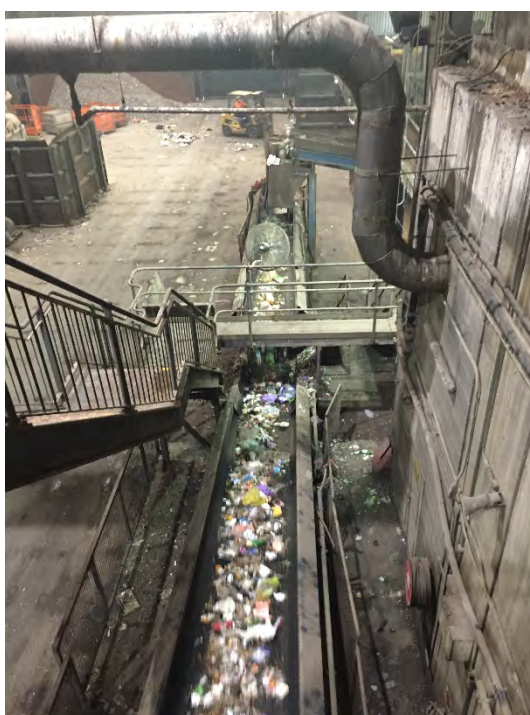
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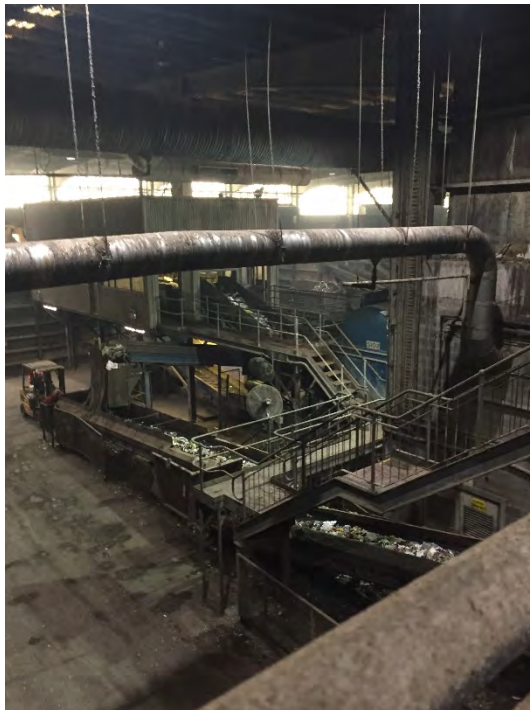
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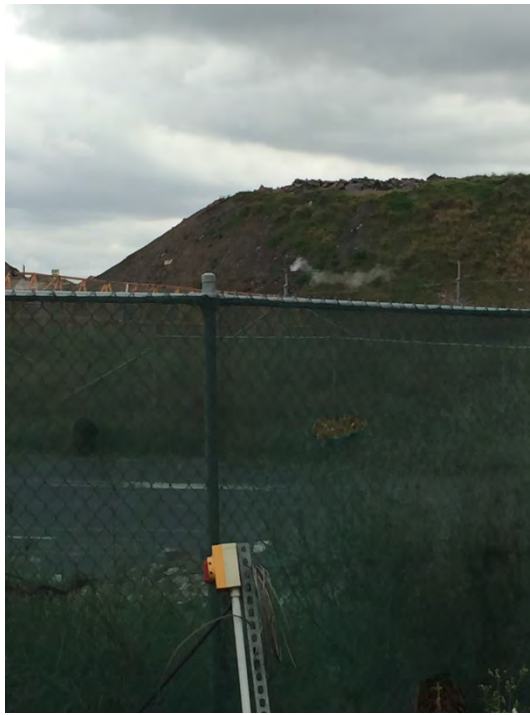
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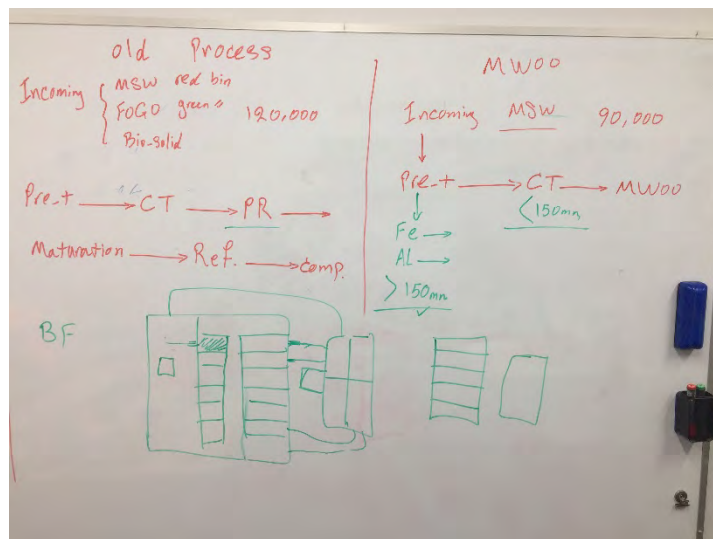
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