



J A C K S O N
ENVIRONMENT AND PLANNING
STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT



2020 Independent Environmental Audit Cleanaway Pty Ltd Erskine Park Waste Transfer Station

Jackson Environment and Planning Pty Ltd
Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060
T: 02 8056 1849 | E: admin@jacksonenvironment.com.au
W: www.jacksonenvironment.com.au

The 2020 Independent Environmental Audit Report has been prepared by the following Staff / Contractors of Jackson Environment and Planning Pty Ltd, Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060:

Author 1: Dr Mark Jackson, Director and Principal Consultant, Jackson Environment and Planning Pty Ltd B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin.

Author 2: Rylan Loemker, Senior Consultant, Jackson Environment and Planning Pty Ltd B.Env.Sc. (Hons.), Graduate Diploma Business and Technology, Cert IV Carbon Management.

Author 3: Alan Parsons, Managing Director, ARP Risk Management Solutions Pty Ltd.

We declare that:

The report contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and the information contained in the audit is neither false nor misleading.

Report version	Authors	Date	Reviewer	Approved for issue	Date
Draft	R. Loemker, Dr M. Jackson, A. Parsons	28/05/2020	A.Parsons	Dr. M.Jackson	01/06/20
Draft v2	R. Loemker, Dr M. Jackson, A. Parsons	15/06/20	A.Parsons	Dr. M.Jackson	17/06/20
Final	R. Loemker, Dr M. Jackson, A. Parsons	26/06/20	A.Parsons	Dr. M.Jackson	26/06/20
Final v2 –DPIE comments addressed	R. Loemker, Dr M. Jackson, A. Parsons	07/09/20	A.Parsons	Dr. M.Jackson	07/09/20

Executive Summary

This report presents the findings of an Independent Environmental Audit that was conducted to assess the environmental performance of Cleanaway's Erskine Park Waste Transfer Station (WTS), located at 85-87 Quarry Rd, Erskine Park NSW.

The audit was conducted by Jackson Environment and Planning Pty Ltd in April 2020, as required under Condition C8 of the Development Consent (SSD 7075). The scope of the Audit was limited to the period between December 2018 and November 2019 which is the operation phase period 12-months since operations commenced at the facility. The audit was conducted in accordance with the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018).

The audit included an assessment of compliance with the following four modifications to the Development Consent approved under Section 96(1A) of the *Environmental Planning and Assessment Act* 1979 by the Department of Planning, Industry and Environment:

- Modification 1 (Mod 1) - modifications to the development staging, car and truck parking, the office, the load-out bays, the stormwater management system, site levels and landfill ramps;
- Modification 2 (Mod 2) - modifications to the site levels, access ramp and car parking;
- Modification 3 (Mod 3) - modifications to the installation of a manual sort line, minor site layout alterations and minor building design alterations; and
- Modification 4 (Mod 4) - extending the construction hours for Stage 1 of the development.

The audit also included an assessment of compliance with management plans in place, and the Statement of Commitments in the original Environmental Impact Statement and subsequent modifications to actual performance. The Audit included environmental performance requirements under Environmental Protection Licence (20986) for the same period. The results of the audit are summarised below.

- Consent Conditions:
 - 70 of the 80 consent conditions relating to the development were found to be in a compliant state;
 - The non-compliances (10) related to general conditions that require: the development to be managed fully in accordance with consent conditions; to prevent and minimise dust and litter; fully implement the odour management plan; erosion and sediment control; and landscaping maintenance.
- Statement of Commitments:
 - 39 of the 41 Statement of Commitments of Commitments were found to be in a compliant state;
 - The non-compliances (2) related to landscape maintenance and erosion control.
- EPA licence conditions:
 - 53 of the 57 conditions of EPA Licence 20986 were found to be in a compliant state;
 - The non-compliances (4) related to tracking of soil onto a public road, dust and clean up of waste spills.

The audit found that the WTS operations were well managed, with very good control of odour, pests, dust, management of waste, traffic management and emergency management. However, some of the external areas of the operation showed evidence of litter accumulation (though no evidence of litter movement beyond the boundaries), with some residual building waste materials that require clean up. Maintenance of landscaping around the development appeared to be insufficient, with exposed soil surfaces that generate sediment, with accumulation of soil on some hardstand areas. Small spillages of waste external to the WTS and tracking of sediment onto hardstand areas was observed from the skip bin storage area.

The frequency of inspections across the site is recommended to be increased to ensure the facility is being operated in accordance with the Conditions of Consent (and supporting management plans), Statement of Commitments and

EPA licence conditions. We recommend a daily inspection of external hardstand areas be done to ensure the site is clean and tidy at all times.

CONTENTS

Executive Summary	3
1. Introduction	7
1.1. About the site.....	7
1.2. Site changes and upgrades	7
1.3. Operational Environmental Management.....	8
2. Independent Environmental Audit	9
2.1. Legislative Requirements	9
2.2. Audit Scope and Objectives	9
2.2.1. Project implementation phase.....	9
2.2.2. Documentation	9
2.2.3. Spatial Scope	10
2.3. Audit Team and Meeting Attendance.....	12
2.4. Methodology.....	12
2.4.1. Compliance Assessment Criteria.....	13
3. Audit Findings	14
3.1. Compliance checklists	14
3.2. Compliance assessment summary	14
3.2.1. State Significant Development 7075 Non-Compliances (Schedule B)	14
3.2.2. State Significant Development 7075 Non-Compliances (Schedule C)	15
3.2.3. Statement of Commitments Non-Compliances	16
3.2.4. Environment Protection Licence Non-Compliances	16
3.3. Compliance with Operational Environmental Management Plan	17
3.4. Complaints	18
3.5. Incidents.....	18
3.6. Agency consultation on key environmental issues.....	18
3.6.1. NSW EPA	19
3.6.2. Penrith City Council.....	19
3.6.3. NSW Department of Planning and Environment	19
3.7. Overview and discussion of environmental performance	19
3.8. Continuous improvement opportunities	19
3.9. Recommended Actions	20
4. Conclusions	25
5. Independent Audit Certification	26
Appendix A – Audit Team Approval	27

Appendix B – Audit Plan.....	28
Appendix C – Development Consent Compliance Table.....	29
Appendix D – Environment Impact Assessment – Statement of Commitments	63
Appendix E – Environment Protection Licence 20986.....	76
Appendix F – Site inspection photos.....	96

1. Introduction

This report presents the findings of the Independent Environmental Audit (the Audit) conducted by Jackson Environment and Planning Pty Ltd (JEP) in April 2020. Cleanaway Pty Ltd (Cleanaway) commissioned JEP to conduct the Audit and assess the environmental performance of the Erskine Park Waste Transfer Station (WTS), located at 85-87 Quarry Rd, Erskine Park NSW for the period between December 2018 and November 2019.

On 30th March 2020, the Department of Planning, Industry and Environment approved the audit team to undertake the audit (refer to Appendix A).

1.1. About the site

Operating under State Significant Development Consent (SSD 7075) (Modifications 1-4 for the audit period) and Environment Protection Licence (EPL) No. 20986, the Site is approved for the receipt of up to 300,000 tonnes of mixed household and commercial waste per annum.

The WTS can accommodate a nominal daily volume of approximately 1,040 tonnes of waste per day, with an overall design capacity of 300,000 tonnes per annum. The Erskine Park WTS has consent to operate twenty-four (24) hours a day, seven (7) days a week. The key design features of the WTS include:

- Modern weighbridges;
- Three fast-acting roller doors to facilitate truck movement in and out of the WTS;
- A motorised fresh make-up building louvre system that facilitates the action of Tri-stack System;
- Full containment and extraction of internal building air via a Tri-stack system;
- A scrubber system capable of fully servicing the design airflow of one of the three identical Tri-stack fan units;
- A process control room, consisting of a supervisory control and data acquisition (SCADA) system, responsible for the monitoring and control of the Tri-stack and scrubber systems;
- An auger screen and sorting line; and
- A truck loading area that is fully enclosed as part of the normal operation of the WTS building.

1.2. Site changes and upgrades

Four modifications to the Development Consent have been submitted under Section 96(1A) of the EP&A Act and approved by the Department of Planning and Environment. The modifications are summarised below:

- Modification 1 (Mod 1) involved modifications to the development staging, car and truck parking, the office, the load-out bays, the stormwater management system, site levels and landfill ramps;
- Modification 2 (Mod 2) involved modifications to the site levels, access ramp and car parking;
- Modification 3 (Mod 3) involved modifications to the installation of a manual sort line, minor site layout alterations and minor building design alterations; and
- Modification 4 (Mod 4) involved extending the construction hours for Stage 1 of the development.

1.3. Operational Environmental Management

Cleanaway manages the environmental performance of the Site under an Operation Environmental Management Plan (OEMP) which has been prepared in conjunction with the Environmental Protection Licence to fulfil the requirements of the SSD Conditions of Consent (CoCs) and the Environmental Impact Assessments Statement of Commitments (SoCs).

The OEMP provides environmental management measures for the following environmental aspects:

- Air Quality, Odour and Dust;
- Traffic and Access;
- Noise Management;
- Surface Water;
- Groundwater;
- Waste Management;
- Visual Amenity and Landscaping;
- Heritage; and
- Contamination.

The OEMP includes the following management plans:

- Odour Management Plan;
- Stormwater Maintenance and Operations Plan;
- Leachate Management Scheme;
- Operational Waste Management Plan;
- Landscape Plan; and
- Pollution Incident Response Management Plan.

The objectives of the OEMP are to:

- Support operations of the Development in accordance with Conditions C3 of Development Consent SSD 7075 (as modified);
- Ensure compliance with all relevant regulatory requirements;
- Minimise the environmental impacts of the Development during operations;
- Engage with the community to minimise complaints;
- Maintain a high level of environmental performance through on-going training and inductions;
- Ensure the commitments made in the approval's documentation are fully implemented and/or complied with during operations; and
- Ensure the environmental risks associated with the operations of the Development are properly managed.

2. Independent Environmental Audit

2.1. Legislative Requirements

As required under Condition C8 of the Development Consent (SSD 7075), an Independent Environmental Audit report is to be submitted to the Department of Planning, Industry and Environment. Specifically, Condition C8 states:

Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:

- (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary;*
- (c) include consultation with the relevant agencies;*
- (d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals);*
- (e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and*
- (f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.*

Condition C9 states:

Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

2.2. Audit Scope and Objectives

Three considerations relevant to the scope of this Independent Environmental Audit include that of

- Project implementation phase;
- Documentation; and
- Spatial Scope.

2.2.1. Project implementation phase

In relation to project implementation phase, the construction/commissioning phase is considered completed and the WTS is currently in operational phase. The closure phase has not been triggered. Based on this, the Operations Phase is the only phase considered as part of the audit scope.

2.2.2. Documentation

The scope of the Audit was limited to assessing the environmental performance of the Site in accordance the conditions of Development Consent SSD 7075 for the period between December 2018 and November 2019. The scope of the audit included an assessment of the following matters:

- The conditions of all relevant approvals;
- Management plan requirements;
- The requirements of relevant regulatory agencies;
- The status of the operation;

- The key regulatory risks, including past or future risks;
- The predictions of environmental impact assessments;
- The performance of the operation;
- Results from previous audits;
- Any incidents or community complaints;
- Feedback received from other regulatory agencies on the performance of the operation;
- Feedback received from the community / community consultative committee on the performance of the operation; and
- Agency policy or other focus areas.

The audit included the development modifications (Mod 1 to Mod 4 inclusive) as listed above.

Records reviewed fell within this period; however, some observations made by the Auditors relate to the site inspection and audit conducted on 6th April 2020 and again on 25th May 2020.

The audit was conducted in accordance with the Department of Planning and Environment (2018) *Independent Audit – Post Approval Requirements*.

The Audit also included environmental performance requirements under Environmental Protection Licence (20986) for the same period, however this is not specifically required under Condition C8 of SSD 7075.

2.2.3. Spatial Scope

The WTS as located at 85-87 Quarry Road Erskine Park 2759 entirely within Lot1 DP1140063 (refer to Figure 2.1). The spatial scope of the audit excludes the Enviroguard landfill, connected leachate treatment plant and the area identified as Phase 2 which is planned for a future development subject to separate development approval and licensing.

Figure 2.1. Spatial scope of the 2020 Independent Environmental Audit - Cleanaway Pty Ltd's Erskine Park Waste Transfer Station (site boundaries are shown in yellow).



Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd		Client	Cleanaway Pty Ltd
15/06/2020	Revision A	R. Loemker	85-87 Quarry Rd, Erskine Park NSW	Strategy Infrastructure Compliance Procurement	ENVIRONMENT AND PLANNING STRATEGY INFRASTRUCTURE COMPLIANCE PROCUREMENT	Project	Erskine Park Waste Transfer Station
				A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060		Title	Spatial Scope of audit
				E: admin@jacksonenvironment.com.au		Scale	As shown
				T: 02 8056 1849		Source	NearMaps
				W: http://www.jacksonenvironment.com.au			

2.3. Audit Team and Meeting Attendance

In accordance with Condition C8 of SSD 7075 and Section 3 of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018) (the Independent Audit Requirements), Cleanaway presented the Audit Team to the Department of Planning, Industry and Environment and sought approval for the team put forward.

The Audit team from Jackson Environment and Planning Pty Ltd included Dr Mark Jackson (Auditor), Rylan Loemker (Auditor) and Alan Parsons (Lead Auditor).

Approval for the independent audit team was provided to Cleanaway on 30th March 2020. The letter of approval is provided in Appendix A.

The audit team attending the site for the opening and closing meeting on 6th April 2020 involved Mr Alan Parsons (Lead Auditor) and Dr Mark Jackson (Auditor). Attendance on site by Rylan Loemker (Auditor) was not possible due to COVID-19 restrictions at the premises. The audit meeting and site inspection was attended as well by Mr Westley Twist, Operations Manager, Cleanaway Pty Ltd and Mr Bart Downe, Environmental Business Partner, Cleanaway Pty Ltd.

Following the site inspection, Mr Parsons (Lead Auditor) and Dr Jackson (Auditor) discussed the observations and site photos taken during the inspection with Mr Loemker. A post-audit meeting and site inspection was performed by Dr Jackson on 25th May 2020 to seek final data for the audit and to observe improvements to external site maintenance. This meeting was attended by Mr Westley Twist, Operations Manager, Cleanaway Pty Ltd, Mr Bart Downe, Environmental Business Partner, Cleanaway Pty Ltd and Mr Paul Antony, NSW Engineering Manager, Cleanaway Pty Ltd.

2.4. Methodology

The Independent Environmental Audit was conducted in accordance with the Independent Audit Requirements and ISO 19011 *Guidelines for Auditing Management Systems* (2018). The Audit involved the following stages:

- **Audit initiation** – Documents relating to the Audit period between December 2018 and November 2019 were requested;
- **Document review** – Received documentation was reviewed for the purpose of developing the Audit plan of what will be audited;
- **Audit plan** – An audit plan was developed outlining what would be audited, who would do the auditing, when it would happen and who would be audited;
- **Onsite audit** – The onsite audit began with an opening meeting to make introductions, confirm the scope and extent of the Audit and discuss the schedule. Following the meeting, documents immediately presented by Cleanaway were reviewed to gather relevant information that might not have been available beforehand. The auditors then commenced the Audit by interviews and collecting the records / observations that demonstrated whether the processes meet the Development Consent conditions and EPL requirements. Audit findings and any audit conclusions were presented at the closing meeting; and
- **Audit Report (this report)** – The final findings will be formally written and distributed in an audit report.

The audit plan is shown in in Appendix B.

2.4.1. Compliance Assessment Criteria

Compliance has been assessed using the Independent Audit Requirements (Table 2.1).

Table 2.1. Compliance assessment criteria - DPE [2018] *Independent Audit Post Approval Requirements.*

Assessment	Criteria
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 at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

3. Audit Findings

3.1. Compliance checklists

Compliance checklists were developed based on the Conditions of Consent for SSD 7075, Statement of Commitments from the Environment Impact Assessment, the conditions of EPL 20986 and in accordance with the *Independent Audit Guideline* and ISO 19011 *Guidelines for Auditing Management Systems* (2018). The detailed list of compliance conditions is provided in Appendix C (SSD 7075 CoCs), Appendix D (EIS SoCs) and Appendix E (EPL 20986 licence conditions). The compliance assessment summary is provided in Section 3.2 below.

Photos taken during the site inspection on 6th April 2020 are provided in Appendix F.

3.2. Compliance assessment summary

Overall, Cleanaway must operate the development in accordance with the conditions outlined in Schedule C of SSD 7075 (Schedule B, Condition A5) and implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the development (Schedule B, Condition A9).

A total of sixteen (16) non-compliances were observed during the audit in response to the 3 conditions/commitments detailed below and it should be noted that they are concurrent or common to all three aspects. In response to these non-compliances, the Auditor(s) have recommended improvements for Cleanaway to implement to ensure operation of the facility continues in an environmentally sound manner in accordance with the conditions of consent and other approvals. A summary of the non-compliances that were identified during the 2020 Audit is provided below:

- Consent Conditions:
 - 70 of the 80 consent conditions relating to the development were found to be in a compliant state;
 - The non-compliances (10) related to general conditions that require: the development to be managed fully in accordance with consent conditions; to prevent and minimise dust and litter; fully implement the odour management plan; erosion and sediment control; and landscaping maintenance.
- Statement of Commitments:
 - 39 of the 41 Statement of Commitments of Commitments were found to be in a compliant state;
 - The non-compliances (2) related to landscape maintenance and erosion control.
- EPA licence conditions:
 - 53 of the 57 conditions of EPA Licence 20986 were found to be in a compliant state;
 - The non-compliances (4) related to tracking of soil onto a public road, dust and clean up of waste spills.

The non-compliances are described in further detail in the following sections.

3.2.1. State Significant Development 7075 Non-Compliances (Schedule B)

Under Schedule B, the site was non-compliant against two (2) conditions of consent.

Condition A5 requires Cleanaway to carry out the development of the Waste Transfer Station in accordance with the conditions outlined in Schedule C.

Condition A9 requires Cleanaway to implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the development. The ten non-compliances that were identified would indicate measures to prevent and or minimise any harm to the environment are not being fully implemented.

3.2.2. State Significant Development 7075 Non-Compliances (Schedule C)

Under Schedule C, the site was non-compliant against eight (8) conditions of consent.

Condition A1 requires Cleanaway to carry out the Development in accordance with the:

- (a) *Staged Development Application (SSD 7075);*
- (b) *EIS;*
- (c) *RTS;*
- (d) *Conditions in Schedule B;*
- (e) *Site and elevation plans as identified in Appendix 1B and 2;*
- (f) *Mod 1;*
- (g) *Mod 2;*
- (h) *Mod 3;*
- (i) *Mod 4; and*
- (j) *Management and mitigation measures as identified in Appendix 3.*

Condition A3 requires Cleanaway to comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:

- (a) *any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent;*
and
- (b) *the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.*

Condition B4 requires the premises to be maintained in a condition that minimises or prevents the emission of dust from the premises. Section 4.2, Table 7 of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated October 2018) provides mitigation measures that will be implemented to manage dust. Whilst the site inspection on the 6th April 2020 found evidence of good internal dust control, with misting system in operation, the tracking of soil onto the concrete hardstand was observed to be a source of dust on the premises. Evidence of soil and sediment transfer from runoff from the Enviroguard landfill, which is adjacent to the premise, onto the hardstand areas of the WTS was observed, causing dust during high winds. It is important to note that during a reinspection on 25th May 2020, it was observed that dust was being managed more effectively and compliant with this condition of consent.

Condition B11 requires Cleanaway to carry out the Development in accordance with the Odour Management Plan approved by the Secretary. The site inspection on the 6th April 2020 found that all existing mitigation measures to prevent odour emissions were being implemented. However, a spillage of a small amount of putrescible waste was observed on the concrete hardstand outside the Load Out Area of the Waste Transfer Station on the day of the Audit inspection. Whilst daily site inspections are done in compliance with Section 6.3 of the Odour Management Plan, spills should also be proactively reported by employees to enable rapid clean-up. This was not completed.

Condition B13 requires Cleanaway to submit a copy of the audit report to the Secretary, EPA and Penrith City Council, together with its response to any recommendations contained in the audit report within two months of commissioning of the odour audit. It is understood that the Odour Audit Report was not submitted to the Secretary and Penrith City Council within the required timeframe, as reported to the Department in the Annual Review dated November 2019.

Condition B15 requires Cleanaway to operate the premise to comply with section 120 of the *Protection of the Environment Operations Act 1997*, which prohibits the pollution of waters, except as expressly provided in an EPL. More specifically, Condition B20 requires Cleanaway to implement erosion and sediment control measures. The site

inspection on the 6th April 2020 generally found that concrete hardstand areas had sediment build up from the movement of heavy vehicles into and out of the WTS, potentially impacting on stormwater quality.

Furthermore, whilst the landscaped areas around the south of the facility were poorly vegetated due to extended drought conditions, with exposed soils, showing accumulation of sediment around pits and sediment fences. Scouring on the surface of the sloped bank where the facility boundary joins the boundary with the landfill lot was observed, with transported soil/sediment at the base of the slope. In addition, there was evidence of soil tracking onto the front entry of the site via vehicles accessing an unsealed area where bins and equipment are being stored.

Condition B20 requires Cleanaway to implement erosion and sediment control measures on-site in accordance with *Managing Urban Stormwater: Soils and Construction Vol. 1* (Landcom, 2004). The Erskine Park Waste Stage 1 - Waste Transfer Station Erosion and Sediment Control Plan (dated 9 June 2017) which is appended (Appendix I) to the Construction Environmental Management Plan was sighted by the Auditors. However, during the site inspection 6th April 2020, the concrete hardstand areas had sediment build up from the movement of heavy vehicles into and out of the Waste Transfer Station, potentially impacting on stormwater quality. Furthermore, the landscaped areas around the south of the facility were poorly vegetated, with exposed soils, showing accumulation of sediment around pits and sediment fences. Movement of sediment was also observed from the landfill onto the hardstand of the Waste Transfer Station (southern side) and there was evidence of soil tracking onto the front entry of the site via vehicles accessing an unsealed area where bins and equipment are being stored (Stage 2 future development area).

Condition B33 requires Cleanaway to carry out the Development in accordance with the approved Building and Material Schedule and Landscape Plan. The site inspection on the 6th April 2020 noted that the development was largely completed in accordance with the Building and Material Schedule. However, it was identified that landscape maintenance requires improvement. Replanting of shrubs and turf, and increased use of mulch will help to reduce water and wind erosion, and transfer of sediment onto hardstand areas. Weeds were identified in areas along the western and southern areas of the site and were not well maintained. Landscaped areas also contained litter and building waste, which require removal.

3.2.3. Statement of Commitments Non-Compliances

The site was found to be compliant with 39 of the 41 Statement of Commitments.

Statement of Commitment 7.4.5 states that landscape works will be implemented as part of the Development. It was identified during the site inspection on the 6th April 2020 that landscaped areas were not being adequately maintained. Replanting of shrubs and turf, and increased use of mulch will help to reduce water and wind erosion, and transfer of sediment onto hardstand areas. Weed removal, cleanup of litter and some building waste materials is required around the development.

Environmental Impact Statement – Statement of Commitment 7.6.4 requires cut and fill slopes to be battered or retained for stability and to reduce the risk of erosion. The site inspection on the 6th April 2020 found that the batters on the south of the facility were poorly vegetated, with exposed soils, showing accumulation of sediment around pits and sediment fences. Movement of sediment was also observed from the landfill onto the hardstand of the southern side of the WTS.

Whilst the 2019 Annual Review report documents that landscaping and cut and fill slope revegetation was successfully completed across the site in accordance with the approved Landscape Plan in December 2018, the success of landscaping has been affected by drought. Replanting of shrubs and turf, and increased use of mulch will help increase the success and survival rates of landscaping around the development.

3.2.4. Environment Protection Licence Non-Compliances

The site was found to be compliant with 53 of the 57 of the conditions of EPA licence 20986.

Under licence condition O3.2 requires that all vehicles leaving the Premises must not track dirt, sand or other materials onto public roads, and the site under condition L1.1 shall comply with section 120 of the *Protection of the Environment Operations Act 1997* in relation to avoiding pollution of waters. The site inspection on the 6th April 2020 found evidence of soil tracking onto the front entry of the site via vehicles accessing an unsealed area where bins and equipment are being stored. Tracking of soil onto Quarry Road was evident, with potential impacts on water quality.

EPL 20986 licence condition O3.3 requires the premises to be maintained in a condition which minimises or prevents the emission of dust from the premises. The site inspection on the 6th April 2020 found evidence of good internal dust control, with misting system in operation. However, the tracking of soil onto the concrete hardstand was observed to be a source of dust on the premises. Evidence of soil and sediment transfer from runoff from the landfill onto the hardstand areas of the WTS was observed, causing dust during high winds.

EPL 20986 licence condition E2.1 requires the licensee to:

- (a) *Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents.*
- (b) *In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA.*
- (c) *Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.*

Section 4.10 of the OEMP addresses the requirement for immediate clean-up of spills, leaks or other discharges. However, the site inspection by on the 6th April 2020 observed spillage of a small amount of putrescible waste on the concrete hardstand outside the Load Out Area of the WTS. Whilst daily site inspections are done under Section 6.3 of the Odour Management Plan, spills should also be proactively reported by employees to enable rapid clean-up. This was not done.

3.3. Compliance with Operational Environmental Management Plan

The audit also considered compliance against the sites Operational Environmental Management Plan. The non-compliances are noted in Table 3.1. These non-compliances are consistent with those found under the CoCs, SoCs and the EPL licence conditions.

Table 3.1. Compliance with Operational Environmental Management Plan.

Environmental Aspect	Compliance	Applicable Non-compliance Reference(s)
General / Administrative	Non-compliant	<ul style="list-style-type: none"> SSD 7075 CoCs: A5 and A9 (Schedule B) SSD 7075 CoCs: A1 and A3 (Schedule C)
Air Quality, Odour and Dust	Non-compliant	<ul style="list-style-type: none"> SSD 7075 CoCs: B4, B11 and B13 EPL 20986 licence conditions: O3.2 and O3.3
Traffic and Access	Compliant	
Noise Management	Compliant	
Surface Water	Non-Compliant	<ul style="list-style-type: none"> SSD 7075 CoCs: B15 and B20 EIS SoCs: 7.6.4 EPL 20986 licence conditions: E2.1

Environmental Aspect	Compliance	Applicable Non-compliance Reference(s)
Groundwater	Compliant	
Waste Management	Compliant	
Visual Amenity and Landscaping	Non-Compliant	<ul style="list-style-type: none"> SSD 7075 CoCs: B33 EIS SoCs: 7.4.5
Heritage	Compliant	
Contamination	Compliant	

3.4. Complaints

Nine (9) complaints regarding odour were received during for the period between 1 November 2018 to 31 October 2019. No complaints were received regarding dust, noise or traffic. A response was provided to the NSW EPA in relation to these complaints with regards to:

- The amount of putrescible and non-putrescible waste material on the Premises at the time of the complaint;
- If air was being discharged out of the stacks;
- If the wet scrubber pollution control system was being used;
- If all the air from the receival hall was being put through the wet scrubber’;
- If there were any other activities occurring that could have generated the alleged odour;
- A copy of the real time monitoring data from the emissions control system; and
- A copy of the hourly wind rose from the onsite weather station.

No further action occurred in relation to these matters. In most occasions, the site was operating under normal conditions. However, on one particular occasion, the fast-acting roller door malfunctioned.

The proponent noted during the audit that there is a history of some residents in St Clair, Erskine Park & Minchinbury making complaints. However, the proponent noted that there are other waste-based facilities within a five (5)-kilometre radius of the Erskine Park Facility that have the potential to contribute to odour impacts in the area. All odour complaints are to be handled via the NSW EPA with consideration to the context of current site operations and meteorological data.

3.5. Incidents

There were no environmental incidents recorded for the period between December 2018 and November 2019.

3.6. Agency consultation on key environmental issues

As part of the audit process, Jackson Environment and Planning consulted the NSW EPA, Penrith City Council and the NSW Department of Planning and Environment on key environmental issues which need to be considered in the Independent Environmental Audit. The following sections summarises the feedback received from the agencies consulted.

3.6.1. NSW EPA

In an email dated 23/04/20, Ms Nadine Constantinou, Operations Officer – Waste Compliance, NSW EPA indicated that the EPA at this point had no comments in relation to the environmental performance of the WTS.

3.6.2. Penrith City Council

In an email dated 12 May 2020, Mr Anthony Price, Environmental Health Coordinator from Penrith City Council provided no specific compliance matters to raise in relation to the audit, other than a view the development should continue to demonstrate ongoing compliance with the development consent and NSW Environment Protection Authority licence.

3.6.3. NSW Department of Planning and Environment

No comments were received from the NSW Department of Planning and Environment. Should feedback be received in future, an addendum to the Audit Report will be prepared for Department of Planning and Environment.

3.7. Overview and discussion of environmental performance

During the on-site audit, evidence suggested that the WTS operations were well managed, with very good control of odour, pests, dust, management of waste, traffic management and emergency management. However, some of the external areas of the operation showed evidence of litter accumulation (though no evidence of litter movement beyond the boundaries), with some residual building waste materials that require clean up. Maintenance of landscaping around the development appeared to be insufficient, with exposed soil surfaces that generate sediment, with accumulation of soil on some hardstand areas. On windy days, this sediment can contribute to dust generation.

The unsealed road leading into the skip bin storage area of the site was also observed to be a source of sediment tracking onto hardstand areas, with some transfer of sediment onto Quarry Rd by vehicles.

Small spillages of waste during re-tarping of trucks outside the Load Out Bay was also observed during the two site inspections. Re-design of this area is currently underway by Cleanaway to avoid any spillages of waste outside the WTS.

Whilst the WTS operations are well managed to avoid impacts on the environmental, improved housekeeping of external areas of the WTS is required. Increased inspections and maintenance of external areas is recommended to ensure the facility is being operated in accordance with the Conditions of Consent (and supporting management plans), Statement of Commitments and EPA licence conditions.

The number of complaints received by the facility is considered to be low, as noted in the Odour Audit dated July 2019. However, we note that there is a history of odour complaints in the St Clair, Erskine Park & Minchinbury residential communities. Moreover, there are other waste-based facilities within a five (5)-kilometre radius of the Erskine Park Facility that may have the potential to contribute to odour impacts in the St Clair, Erskine Park & Minchinbury residential community.

There were no environment incidents observed during the audit period.

The operation of the facility appeared to be running efficiently and staff members were well trained and experienced. Cleanaway is committed to continuous improvement.

3.8. Continuous improvement opportunities

The audit identified a number of areas for improvement as provided in this section.

One of the main areas for improvement is general housekeeping of the premises, particularly the external areas of the development. This includes dust control and regular cleaning of hardstand areas, cleaning up of spilled waste, and vegetating landscaped areas that generate sediment. We recommend additional training for employees on general housekeeping be provided.

A programmed maintenance schedule for inspection, monitoring and maintenance of stormwater quality improvement devices installed at the facility needs to be developed, to ensure devices are adequately maintained. This also applies to the landscaped areas to ensure the actions under the Landscape Plan are implemented. The current Landscape Plan addresses site establishment but not ongoing maintenance of landscaped areas. It is recommended that the Landscape Plan is updated to contain a post-establishment maintenance program, including monitoring and reporting of compliance with the plan required to ensure landscaped areas are sufficiently vegetated to prevent erosion.

More frequent sweeping of concrete hardstand areas, particularly outside the Waste Transfer Station entry and exit points is required. The hardstand areas should be free of soil and sediment to avoid dust generation. Daily inspections need to be done to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.

It is noted that in a follow up inspection on the 25th May 2020, there was no evidence of soil tracking onto hardstand areas. More frequent sweeping of hardstand areas is being conducted on the site to minimise dust. Dust from the hardstand was not observed, despite high winds during the inspection.

3.9. Recommended Actions

Findings and recommended actions from the Audit are provided in Table 3.2.

Table 3.2. Recommended Actions for the observations/non-compliances from the 2020 Independent Environmental Audit.

Item No.	Reference	Observation / Non-compliance	Recommended Action	Timeframe for completion / implementation	Date completed
SSD 7075 Conditions of Consent					
1	Consent Condition B4	Dust Management	Implement a daily inspections schedule to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.	2 Months	
2	Consent Condition B11		Ensure training for employees on general housekeeping responsibilities, and litter and odour management is current.		
3	Consent Condition B15	Sediment and erosion control	Implement a daily inspections schedule to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation. Ensure training for employees on general housekeeping	2 Months	

Item No.	Reference	Observation / Non-compliance	Recommended Action	Timeframe for completion / implementation	Date completed
SSD 7075 Conditions of Consent					
4	Consent Condition B20		responsibilities, and litter and odour management is current. Implement a programmed maintenance schedule for inspection, monitoring and maintenance of stormwater quality improvement devices installed at the facility to ensure devices are adequately maintained.		
5	Consent Condition B33	Landscaping	Implement post-establishment maintenance program as per the approved Landscape Plan ensure landscaped areas remain sufficiently vegetated to prevent erosion.	3 Months	
EIS Statement of Commitments					
6	Statement of Commitment 7.4.5	Landscaping	Implement post-establishment maintenance program as per the approved Landscape Plan ensure landscaped areas remain sufficiently vegetated to prevent erosion.	3 Months	

Item No.	Reference	Observation / Non-compliance	Recommended Action	Timeframe for completion / implementation	Date completed
SSD 7075 Conditions of Consent					
7	Statement of Commitment 7.6.4	Sediment and erosion control	<p>Implement a daily inspections schedule to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>Ensure training for employees on general housekeeping responsibilities, and litter and odour management is current.</p>	3 Months	
EPL 20986 licence conditions					
8	Condition O3.2 and Condition L1.1	Sediment and erosion control and compliance with section 120 of the <i>Protection of the Environment Operations Act 1997</i>	Update the OEMP and Appendix F (Stormwater Maintenance and Operations Plan) to include procedures for regular sweeping of hardstand areas (e.g. daily) to reduce the potential for stormwater pollutants leaving the site.	2 Months	

Item No.	Reference	Observation / Non-compliance	Recommended Action	Timeframe for completion / implementation	Date completed
SSD 7075 Conditions of Consent					
9	Condition O3.3		<p>Implement a daily inspections schedule to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>Establish vegetation in the areas that is consistent with Appendix I (Landscape Plan) of the OEMP to control sediment generation from the Stage 2 area.</p>		
10	Condition E2.1	Spill management	Ensure training for employees on general housekeeping is current	2 Months	

4. Conclusions

An Independent Environmental Audit was conducted to assess the environmental performance of Cleanaway's Erskine Park Waste Transfer Station, located at located at 85-87 Quarry Rd, Erskine Park NSW.

The audit was conducted by Jackson Environment and Planning Pty Ltd in April 2020, as required under Condition C8 of the Development Consent (SSD 7075). The scope of the Audit was limited to the period between December 2018 and November 2019 which is the operation phase period 12-months since operations commenced at the facility. The audit was conducted in accordance with the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018).

The audit included an assessment of compliance with the following four modifications to the Development Consent approved under Section 96(1A) of the EP&A Act by the Department of Planning, Industry and Environment:

- Modification 1 (Mod 1) - modifications to the development staging, car and truck parking, the office, the load-out bays, the stormwater management system, site levels and landfill ramps;
- Modification 2 (Mod 2) - modifications to the site levels, access ramp and car parking;
- Modification 3 (Mod 3) - modifications to the installation of a manual sort line, minor site layout alterations and minor building design alterations; and
- Modification 4 (Mod 4) - extending the construction hours for Stage 1 of the development.

The audit also included an assessment of compliance with management plans in place, and the Statement of Commitments in the original Environmental Impact Statement and subsequent modifications to actual performance. The Audit included environmental performance requirements under Environmental Protection Licence (20986) for the same period.


During the on-site audit, evidence suggested that the WTS operations were well managed, with very good control of odour, pests, dust, management of waste, traffic management and emergency management. However, some of the external areas of the operation showed evidence of litter accumulation (though no evidence of litter movement beyond the boundaries), with some residual building waste materials that require clean up. Maintenance of landscaping around the development appeared to be insufficient, with exposed soil surfaces that generate sediment, with accumulation of soil on some hardstand areas. On windy days, this sediment can contribute to dust generation.

The unsealed road leading into the skip bin storage area of the site was also observed to be a source of sediment tracking onto hardstand areas, with some transfer of sediment onto Quarry Rd by vehicles.

Small spillages of waste during re-tarping of trucks outside the Load Out Bay was also observed during the two site inspections. Re-design of this area is currently underway by Cleanaway to avoid any spillages of waste outside the WTS.

Whilst the WTS operations are well managed to avoid impacts on the environment, improved housekeeping of external areas of the WTS is required. Increased inspections and maintenance of external areas is recommended to ensure the facility is being operated in accordance with the Conditions of Consent (and supporting management plans), Statement of Commitments and EPA licence conditions. This may be achieved through daily inspections of all external areas.

5. Independent Audit Certification

Development Name	Erskine Park Waste Transfer Station
Development Consent No.	State Significant Development Consent 7075
Description of Development	Erskine Park Waste Transfer Station
Development Address	85-87 Quarry Rd, Erskine Park NSW
Operator	Cleanaway Pty Ltd
Operator Address	85-87 Quarry Rd, Erskine Park NSW 2759
Independent Audit	
Title of Audit	2020 Independent Environmental Audit – Erskine Park Waste Transfer Station
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <i>The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines – Independent Audits</i> <i>The findings of the audit are reported truthfully, accurately and completely;</i> <i>I have exercised due diligence and professional judgement in conducting the audit;</i> <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i> <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i> <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. Immediate family);</i> <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i> <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i> <p>Note.</p> <p>a) <i>The Independent Audit is an ‘environmental audit’ for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p>b) <i>The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
Signature	
Name of Lead / Principal Auditor	Alan Parsons
Address	1 Power Place, Jindabyne NSW 2627
Email Address	alan.parsons@arprisk.com.au
Auditor Certification	DNV GL Business Assurance
Date	7 th September 2020

Appendix A – Audit Team Approval

VIA Email ONLY: bart.downe@cleanaway.com.au

Attention: Bart Downe

30 March 2020

Dear Mr Downe

Agreement of Independent Auditor

Erskine Park Waste and Resource Management Facility (SSD 7075)

I refer to your submission dated 9 March 2020, seeking the agreement of the Secretary of the Department of Planning, Industry and Environment (**Department**) of a suitably qualified, experienced and independent audit team to undertake independent audits of the Erskine Park Waste and Resource Management Facility.

In accordance with Condition C8 of SSD 7075, the Secretary has agreed to the following audit team:

- Alan Parsons as lead auditor;
- Ryan Loemker; and
- Mark Jackson.

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the requirements of Conditions C8 and C9 of SSD 7075. The Department also recommends consideration be given to the *Independent Audit Post Approval Requirements* (Department 2018) to the extent that it does not contradict Conditions C8 and C9 of SSD 7075. 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 Maria Divis on (02) 8275 1156 or email to compliance@planning.nsw.gov.au.

Yours sincerely,



Julia Pope

Team Leader Compliance - Metro Projects

As nominee of the Secretary

Appendix B – Audit Plan



SSD Site Audit: Audit Plan and Agenda
Cleanaway Erskine Park Waste Transfer Station
Site address: 85-87 Quarry Road Erskine Park
Date: Monday 6th April, 2020
Time: 9am to 3pm

Introduction to the audit:

Jackson Environment and Planning Pty Ltd has been engaged by Cleanaway Pty Ltd to undertake an Independent Environmental Audit of the Erskine Park Waste Transfer Station (the Site), located at 85-87 Quarry Road Erskine Park. This audit is required under Condition C8 of the Development Consent (SSD7075). The audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

The objective of the Independent Environmental Audit (the Audit) is to assess the environmental performance of the Site since commencement of operations in December 2018. The Audit will cover the period between December 2018 and November 2019.

The independent audit will be performed in accordance with the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements June 2018* and *AS/NZS ISO 19011:2014 – Guidelines for Auditing Management Systems* (2018).

The Department of Planning, Industry and Environment approved the audit team on 30th March 2020.

Audit team

Members of the audit team are outlined below, including site representatives from Cleanaway Pty Ltd. It is noted that Mr Alan Parsons from ARP Risk Management Solutions Pty Ltd will be supporting the audit team as the lead auditor.

Mr Westley Twist	Operations Manager	Cleanaway Pty Ltd
Mr Bart Downe	Environmental Business Partner	Cleanaway Pty Ltd
Dr Mark Jackson	Director	Jackson Environment and Planning Pty Ltd
Mr Alan Parsons	Director	ARP Risk Management Solutions Pty Ltd
Mr Rylan Loemker	Senior Consultant	Jackson Environment and Planning Pty Ltd

Audit plan

The audit process outlined in ISO 19011 *Guidelines for Auditing Management Systems* (2018) has been used to inform the development of the audit plan. The audit plan including the audit methodology is summarised in Table 1. Audit activities to be performed on site on Monday 6th April 2020 are noted.

Audit Scope and Objectives

Three considerations relevant to the scope of this Independent Environmental Audit include that of

- Project implementation phase;
- Documentation; and
- Spatial Scope.

Project implementation phase

In relation to project implementation phase, the construction/commissioning phase is considered completed and the WTS is currently in operational phase. The closure phase has not been triggered. Based on this, the Operations Phase is the only phase considered as part of the audit scope.

Documentation

The scope of the Audit was limited to assessing the environmental performance of the Site in accordance the conditions of Development Consent SSD 7075 for the period between December 2018 and November 2019. The scope of the audit included an assessment of the following matters:

- The conditions of all relevant approvals;
- Management plan requirements;
- The requirements of relevant regulatory agencies;
- The status of the operation;
- The key regulatory risks, including past or future risks;
- The predictions of environmental impact assessments;
- The performance of the operation;
- Results from previous audits;
- Any incidents or community complaints;
- Feedback received from other regulatory agencies on the performance of the operation;
- Feedback received from the community / community consultative committee on the performance of the operation; and
- Agency policy or other focus areas.

The audit included the development modifications (Mod 1 to Mod 4 inclusive) as listed above.

Records reviewed fell within this period; however, some observations made by the Auditors relate to the site inspection and audit conducted on 6th April 2020 and again on 25th May 2020.

The audit was conducted in accordance with the Department of Planning and Environment (2018) Independent Audit – Post Approval Requirements.

The Audit also included environmental performance requirements under Environmental Protection Licence (20986) for the same period, however this is not specifically required under Condition C8 of SSD 7075.

Spatial Scope

The WTS as located at 85-87 Quarry Road Erskine Park 2759 entirely within Lot1 DP1140063. The spatial scope of the audit excludes the Enviroguard landfill and connected leachate treatment plant and the area identified as Phase 2 which is planned for a future development subject to separate development approval and licensing.

Work health and safety plan

Given the COVID-19 pandemic that is currently in place, we have reviewed the current advice from the Commonwealth's Department of Health. In order to conduct the audit in a safe manner, which is considered an 'essential work gathering', the following safe work practices are proposed:

- Our audit team to be present on site on 6/4/20 will be limited to Mark Jackson and Alan Parsons. We will travel in separate vehicles to the site.
- The Cleanaway team we will meet with will be limited to 3 people.
- We propose that social distancing of 1.5 m will be practice at all times, use of hand sanitizer before and after the inspection.
- We will issue the gaps in the audit data prior to the audit meeting, so this information can be provided electronically by Cleanaway, which will minimise the time required in meetings.
- The audit meeting may be conducted indoors for a brief period (allowing at least 4m² per person), with the majority of the audit time spent outdoors.

- Weather and on-site operations permitting, the meeting can entirely be done outdoors.
- Both Alan and Mark will require a visitor induction by Cleanaway, and we will be accompanied through the site by a member of the Cleanaway staff.

Table 1. Summary of the audit methodology and the audit plan.

Status	Audit plan task
Approved	Letter seeking audit team approval – In accordance with the NSW Department of Planning and Environment's Independent Audit Post Approval Requirements June 2018, we will prepare a letter for you to insert onto your letterhead to seek DPIE approval of our audit team. We will include the CV's of the audit team to assist in this process.
Completed	Develop the Audit Plan – An audit plan be developed outlining what will be audited, who will do the auditing, when it will happen and who will be audited, and how much time will be dedicated to each process in the audit. Work will also be assigned to auditors. The audit working papers will also be prepared to identify what the auditors wants to verify, what questions to ask, and what they expect as evidence. The Audit Plan will also include the audit sequence. We will also allow time for consultation with relevant agencies, including NSW EPA, Department of Planning, Industry and Environment and Penrith City Council in accordance with your consent and the Independent Audit Post Approval Requirements June 2018.
Scheduled for 6 th April 2020	Conduct the opening meeting – The onsite audit begins with an opening meeting. This is to introduce the auditors, confirm the scope and extent of the audit and discuss the schedule.
Scheduled for 6 th April 2020	Review documents – After the meeting, any documents immediately presented by Cleanaway will be reviewed to gather relevant information that might not have been available before.
Underway	Carry out the audit – The auditors will commence the audit by interviews and collecting the records and observations that will demonstrate if the processes meet the Development Consent conditions and EPL requirements. We will also write to NSW EPA, Department of Planning, Industry and Environment and Penrith City Council and seek any feedback on the environmental performance of the development.
Underway	Generate findings and conclusions – JEP will generate the audit findings and prepare any audit conclusions to be presented at the closing meeting.
To be scheduled	Conduct the closing meeting – The onsite audit finishes with a closing meeting. This is to present the audit findings and provide Cleanaway with the opportunity to discuss and ask questions about the audit and findings.
Approx 2 weeks after site audit (20/04/20)	Formalise audit findings in a report – The final findings will be formally written and distributed in an audit report. The report will be provided within two (2) weeks of the on-site audit.

An agenda for delivery of the on-site audit on Monday 6th April 2020 is given in Table 2.

Table 2. Agenda for the on-site audit scheduled for Monday 6th April 2020.

Agenda item	Item description
1.	0900 - 0915: Introductions (all)
2.	0915 - 0930: Confirm scope of the audit (Mark)
3.	0930 - 1000: Overview of the Audit Plan (Mark / Rylan) <ul style="list-style-type: none">• Documents reviewed as part of the desktop audit• Review of gaps in audit data / evidence needed• Complaints data• Timeline for providing audit data• Site inductions and familiarization walk through• Detailed site inspection of operations• Post walk through discussion and additional evidence to be provided• Timeline for preparation of draft and final report for submission to DPE
4.	1000 - 1030: Site inductions and familiarisation walk through (all)
5.	1030 - 1230: Audit of site operations (audit team to split up and to be accompanied by a Cleanaway member of staff): <ul style="list-style-type: none">• Environmental monitoring and reporting (Alan)• Community liaison and complaints handling (Alan)• Training, induction, communications and roles / responsibilities under the OEMP (Alan)• Waste Management and waste handling (Mark)• Odour management (Mark)• Dust management (Mark)• Traffic management (Mark)• Stormwater management (Mark)• Vermin and pest control (Mark or Alan))• Site contamination management (Mark or Alan)• Incident response (Mark or Alan)• Noise management (Mark or Alan)• Operational Contingency Management (Mark or Alan)
6.	1230 - 1330: Lunch and auditor discussion of initial findings (audit team only)
7.	1330 - 1430: Review of audit findings and additional evidence required to complete audit.
8.	1430 - 1500: Questions and close

Appendix C – Development Consent Compliance Table

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
SCHEDULE B – PART A CONDITIONS OF CONSENT FOR CONCEPT PROPOSAL (STAGES 1 AND 2)				
	STAGED DEVELOPMENT DESCRIPTION			
A1	Consent is granted to the Concept Proposal as described in: (a) Schedule A; (b) Staged Development Application (SSD 7075); (c) EIS; (d) RTS; (e) Site layout plan as identified in Appendix 1A; (f) Mod 1; (g) Mod 2; (h) Mod 3; (i) Mod 4; and (j) conditions contained in this development consent	None	None	Not Triggered
A2	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	The findings of this audit	None	Not Triggered
	CONSENT LIMITS			
A3	This consent does not permit the construction and operation of the Stage 2 Resource Recovery Facility.	The findings of this audit	None	Not Triggered
A4	All waste received at the Site must enter at the Waste Transfer Station for initial processing. The Waste Transfer Station must not process more than 300,000 tpa of waste (as identified in the EPL), up to 150,000 tpa of this waste may be recycled at the Resource Recovery Facility (Stage 2).	The auditors sighted the weighbridge records from their WasteMan Weighbridge software. Total tonnage of waste received between the site opening (27 December 2018) and November 2019 was 185,458.93 tonnes. This data was provided by their WasteMan Weighbridge software. Example EPA WARRP reports were cited as well as monthly waste tonnages received.	The amount of waste accepted at the Terminal during the audit period totaled 185,458.93 tonnes.	Compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
A5	The Applicant shall carry out the development of the Waste Transfer Station in accordance with the conditions outlined in Schedule C.	The findings of this audit including 8 non-compliances observed.	8 Non-compliances were identified against the 65 conditions outlined in Schedule C.		Non-compliant
	ADMINISTRATIVE CONDITIONS				
	Determination of Future Development Applications				
A6	In accordance with section 83B(3) of the EP&A Act, Stage 2 is to be subject of a future development application.	None	This condition is not relevant to the current Audit period.		Not Triggered
A7	The determination of the future development application(s) are to be consistent with the terms of this development consent as described in Schedule A, and subject to the conditions in Schedule B..	None	This condition is not relevant to the current Audit period.		Not Triggered
A8	As per Clause 12(b) of the <i>State Environmental Planning Policy State and Regional Development</i> 2011, any future development application(s) shall be classified State Significant Development.	Audit Interview - no new Development Applications have been lodged.	This condition is not relevant to the current Audit period.		Not Triggered
	Obligation to Minimise Harm to the Environment				
A9	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the development.	The findings of this audit including 8 non-compliances observed.	8 Non-compliances were identified which would indicate improvements to housekeeping practices are required in respect to measures that may prevent potential off-site impacts from on-site activities.		Non-compliant
	Statutory Requirements				
A10	The Applicant shall ensure that all licences, permits, and approvals/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals/consents.	Audit Interview.	Site is compliant with this condition.		Compliant
	Inconsistency between Documents				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
A11	If there is any inconsistency between the plans and documentation referred to above, the most recent document shall prevail to the extent of the inconsistency. However, conditions of this consent prevail to the extent of any inconsistency.	None	None	Not Triggered
	Lapsing of Approval			
A12	This consent lapses five years after the date from which it operates, unless the Stage 1 works have physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under Section 95 of the Act.	The findings from this audit	Stage 1 works physically commenced on 01 Nov 2017.	Not Triggered
	Dispute Resolution			
A13	In the event that a dispute arises between the Applicant, Council or a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	None	None	Not Triggered
	Legal Notices			
A14	Any advice or notice to the consent authority shall be served on the Secretary.	None	None	Not Triggered
SCHEDULE C – CONDITIONS OF CONSENT FOR STAGE 1 - WASTE TRANSFER STATION				
PART A ADMINISTRATIVE CONDITIONS				
	DEVELOPMENT IN ACCORDANCE WITH PLANS AND DOCUMENTS			
A1	The Applicant shall carry out the Development in accordance with the: (a) Staged Development Application (SSD 7075); (b) EIS; (c) RTS; (d) Conditions in Schedule B; (e) Site and elevation plans as identified in Appendix 1B and 2; (f) Mod 1; (g) Mod 2; (h) Mod 3; (i) Mod 4; and (j) management and mitigation measures as identified in Appendix 3.	The findings of this audit	8 Non-compliances were identified against the 65 conditions outlined in Schedule C.	Non-compliant
A2	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	The findings of this audit	None	Not Triggered

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
A3	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent; and (b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	The findings of this audit	Non-compliances were identified against the 65 conditions outlined in Schedule C.		Non-compliant
	LIMITS OF CONSENT				
	Waste Limits				
A4	The Applicant shall not receive or process on the Site more than 300,000 tonnes of waste per calendar year.	The auditors sighted the weighbridge records from their WasteMan Weighbridge software. Total tonnage of waste received between the site opening (27 December 2018) and November 2019 was 185,458.93 tonnes. This data was provided by their WasteMan Weighbridge software.	The amount of waste accepted at the Terminal during the audit period totaled 185,458.93 tonnes, below the limit of 300,000 tonnes per calendar year.		Compliant
A5	The Applicant must record the amount of waste (in tonnes) received at the Site on a daily basis.	The auditors sighted the weighbridge records from their WasteMan Weighbridge software. Total tonnage of waste received between the site opening (27 December 2018) and November 2019 was 185,458.93 tonnes. This data was provided by their WasteMan Weighbridge software.	Site is compliant with this condition.		Compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
A5A	The manual sort line approved as part of Mod 3 must only be used to separate general solid waste (non-putrescible).	Site Inspection completed on 06/04/20. An inspection of the manual sort line was done. Dry commercial waste was observed to be loaded onto a conveyor, passing through a pre-screen to screen out larger materials followed by manual sorting by workers stationed within an enclosed storing station as per the approved plans under Mod 3.	Manual sorting line observed to only sort non-putrescible waste consistent with the Mod 3 approval.		Compliant
	STAGED SUBMISSION OF PLANS OR PROGRAMS				
A6	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or (b) combine any strategy, plan or program required by this consent.	None	None		Not Triggered
A7	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program shall clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined shall be demonstrated.	The findings from this audit	All plans are specific to Stage 1 of the development and this is clearly demonstrated.		Compliant
	EVIDENCE OF CONSULTATION				
A8	Where consultation with any public authority is required by the conditions of this consent, the Applicant shall: (a) consult with the relevant public authority prior to submitting the required documentation to the Secretary or the PCA for approval, where required; (b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and (c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this development consent.	None	None		Not Triggered
	METEOROLOGICAL MONITORING				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
A9	Prior to commencement of operations, the Applicant shall ensure that there is a suitable meteorological station on the Site that complies with the requirements in the latest version of the Approved Methods for Sampling of Air Pollutants in New South Wales. The Applicant shall operate the meteorological station, and maintain continuous, auditable records of meteorological data, for the life of the Development.	Site Inspection done on 06/04/20 observed the meteorological station in place on the northern side of the site. The Auditors sighted the meteorological station data for the period 01 December 2018 to 30 November 2019.	A suitable meteorological station is operating at the Site.	Compliant
	DEMOLITION			
A10	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: <i>The Demolition of Structures</i> , or its latest version.	None	This condition is not relevant to the current Audit period.	Not Triggered
	BUILDING CODE OF AUSTRALIA			
A11	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the Building Code of Australia.	None	This condition is not relevant to the current Audit period.	Not Triggered
	OPERATION OF PLANT AND EQUIPMENT			
A12	The Applicant shall ensure that all plant and equipment used for the Development is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	None	This condition is not relevant to the current Audit period.	Not Triggered
	PROTECTION OF PUBLIC INFRASTRUCTURE			
A13	The Applicant shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the Development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the Development.	None	This condition is not relevant to the current Audit period.	Not Triggered
PART B ENVIRONMENTAL PERFORMANCE				
	WASTE MANAGEMENT			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B1	The Applicant shall not cause, permit or allow any materials or waste (as defined by the POEO Act) generated outside the Site to be received at the Site for storage, treatment, processing, reprocessing, or disposal on the Site, except as expressly permitted by an EPL.	Site inspection by the Auditors on 06/04/20 indicated that was materials being received were General Solid Waste (putrescible and non-putrescible) consistent with Condition L2.1 of EPL 20986. Erskine Park Waste Transfer Station – Stage 1 Operational Waste Management Plan (dated 6 August 2018) cited.	Site is compliant with this condition.		Compliant
B2	From the commencement of operation, the Applicant shall implement a Waste Monitoring Program for the Development. The program must: (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; (b) include suitable provision to monitor the: i. quantity, type and source of waste received on-site; and ii. quantity, type and quality of the outputs produced on-site. (c) ensure that: i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the Site; and ii. staff receive adequate training in order to be able to recognise, handle and report any hazardous or other prohibited waste, including asbestos.	Section 5.3.1 of Erskine Park Waste Transfer Station – Stage 1 Operational Waste Management Plan (dated 6 August 2018) provides information on the Waste Monitoring Program that will be implemented while the Development operates.	Cleanaway's last Asbestos Awareness Training was 3 years ago for landfill operational staff. A new Asbestos Awareness Program is currently being rolled out to staff that work in the Erskine Park Waste Transfer station and will be completed once COVID-19 restrictions are lifted.		Compliant
	AIR QUALITY				
	Construction Mitigation				
B3	During construction, the Applicant shall ensure that: (a) all vehicles on-site do not exceed a speed of 30 kilometres per hour; (b) all loaded construction vehicles entering or leaving the Site have their loads covered; and (c) all construction vehicles leaving the Site are cleaned of dirt, sand and other materials before they leave the Site, to avoid tracking the materials on public roads.	None	This condition is not relevant to the current Audit period.		Not Triggered

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
	Dust Management				
B4	The premises shall be maintained in a condition that minimises or prevents the emission of dust from the premises.	<p>Section 4.2, Table 7 of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated October 2018) provides mitigation measures that will be implemented to manage dust.</p> <p>Site inspection by the Auditors on 06/04/20 within the Waste Transfer Station showed evidence of good internal dust control, with misting system in operation. Tracking of soil onto the concrete was observed to be a source of dust on the premises. Evidence of soil and sediment transfer from runoff across the site and onto the hardstand areas of the Waste Transfer Station was observed, causing dust during high winds.</p>	<p>More frequent sweeping of concrete hardstand areas, particularly outside the Waste Transfer Station entry and exit points is required using a risk-based approach. Hardstand should be free of soil and sediment to avoid dust generation.</p> <p>Improved landscaping maintenance on grounds area is required to prevent soil erosion from wind and water action.</p>		Non-Compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B5	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading within the Waste Transfer Station.	<p>Section 5.2 of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated October 2018) provides operational controls that will be implemented at the site to control odours including driver training including covering loads at all times.</p> <p>Site inspection by the Auditors on 06/04/20 found that trucks entering and leaving the facility were covered at all times, except during unloading and loading within the building.</p>	Site is compliant with this condition.		Compliant
	Odour				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
B6	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	<p>Appendix E (Odour Management Plan dated Jun 2017) of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated October 2018) provides the management structure and strategies for odour performance during the continued operation of the WTS</p> <p>Site inspection by the Auditors on 06/04/20 found that no odour was detectable outside the Waste Transfer Station. Evidence suggest mitigation measures in place and the odour control system was performing adequately.</p>	Site is compliant with this condition.	Compliant
B7	The Applicant shall ensure that any waste vehicles parked on the Site do not emit offensive odours.	Site inspection by the Auditors on 06/04/20 found that no odour was detectable from any parked waste collection vehicles on the site.	Site is compliant with this condition.	Compliant
	Air and Odour Emissions Mitigation			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B8	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) operate the Development so that air and odour emissions are minimised during all meteorological conditions; (b) implement best management practice, including all reasonable and feasible air and odour emission mitigation measures to minimise emissions from the Development, including but not limited to an Air Pollution Control System comprising of: <ul style="list-style-type: none"> i. a wet scrubber, or an alternative air filtration system, approved by the Secretary, that can achieve an equivalent or better level of odour control to a wet scrubber; ii. dilution stacks; iii. fast acting roller doors; iv. dust suppression through the use of water sprays/misters; (c) seal on-site surfaces and regularly maintaining them to prevent dust re-entrainment from vehicle movements and other equipment use; and (d) ensure regular maintenance of the air pollution control system. 	<p>Site inspection by the Auditors on 06/04/20 found that no odour was detectable outside the Waste Transfer Station. Evidence suggest equipment maintenance and road dust mitigation measures are in place. The odour control system was performing adequately.</p>	<p>Site is compliant with this condition.</p>		Compliant
	Odour Management Plan				
B9	<p>Prior to acceptance of any waste at the Waste Transfer Station, the Air Pollution Control System identified in condition B8b) must be installed and operational. The wet scrubber technology or similar must be sized with an appropriate level of contingency to enable the level of control to be able to be scaled up if necessary.</p>	<p>Site inspection by the Auditors on 06/04/20 found that no odour was detectable outside the Waste Transfer Station. Evidence suggest mitigation measures in place and the odour control system was performing adequately.</p>	<p>Site is compliant with this condition.</p>		Compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B10	<p>Prior to commencement of construction, the Applicant shall prepare an Odour Management Plan to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitable qualified and experienced person(s) in consultation with the EPA; (b) describe the measures that would be implemented on-site to ensure: <ul style="list-style-type: none"> i. all reasonable and feasible measures are employed to minimise odour emissions, including details of the air pollution control device(s) and all other operational odour mitigation measures; ii. compliance with the relevant conditions of this consent; iii. contingency measures are deployed to minimise impacts should adverse odour emissions occur or appear likely to occur; (c) include an ongoing monitoring program; (d) include well defined triggers for the deployment of odour mitigation and contingency measures; (e) include a protocol to determine the occurrence of an exceedance of any criteria in the EPL should an exceedance occur; and (f) include contingency measures for design or system failure. 	<p>The Erskine Park Resource Management Facility Odour Management Plan (report dated June 2017) was sighted by the Auditors.</p> <p>Site inspection by the Auditors on 06/04/20 found that all existing mitigation measures to prevent odour emissions were being implemented.</p>	Site is compliant with this condition.		Compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B11	The Applicant shall carry out the Development in accordance with the Odour Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	<p>Site inspection by the Auditors on 06/04/20 found that all existing mitigation measures to prevent odour emissions were being implemented.</p> <p>However, a spillage of a small amount of putrescible waste was observed on the concrete hardstand outside the Load Out Area of the Waste Transfer Station on the day of the Audit inspection.</p> <p>Whilst daily site inspections are done under Section 6.3 of the Odour Management Plan, spills should also be proactively reported by employees to enable rapid cleanup. This was not done.</p>	<p>The operator should conduct additional training for employees on general housekeeping, responsibilities and odour management</p> <p>It is noted that plans have been developed to improve the management of spillage in this area by the construction of an extension of the building to allow trucks to cover loads inside the facility. Timing for the construction is unknown at this stage.</p> <p>An improved focus on general housekeeping and odour management in staff training will help to address this matter.</p>		Non-compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B12	<p>Within 6 months of operation or as otherwise directed by the Secretary, the Applicant shall carry out an Odour Audit of the Development. The timing of the audit shall coincide with the receipt of putrescible waste at the Waste Transfer Station. The audit must:</p> <ul style="list-style-type: none"> (a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary; (b) audit the Development whilst it is in full operation; (c) include a summary of air and odour emission related complaints and any actions that were carried out to address the complaints; (d) validate the Development against the odour predictions in the RTS; (e) if, as part of the Odour Audit, or as the result of any other odour monitoring, the odour predictions are demonstrated to be inaccurate, initiate an action plan as per B12 (h). (f) if odour complaints are received, the Applicant must review the meteorological data for the Site and the region to establish the likelihood that the source of the odour originated from the Site. If it is likely that the odour originated from the site it must be reported in accordance with condition C6. (g) review design and management practices of the Development against industry best practice for air emissions and odour management; and (h) include an action plan that identifies and prioritises additional air and odour emission mitigation measures that may be necessary to reduce air and odour emissions. <p><i>Note: the aim of the odour audit is to validate the odour predictions in the RTS and therefore the audit should be conducted when large amounts of putrescible waste are present on the Site.</i></p>	<p>The Erskine Park Resource Management Facility Waste Transfer Station Odour Audit (Final Report dated July 2019) was sighted by the Auditors.</p> <p>A number of recommendations from the Erskine Park Resource Management Facility Waste Transfer Station Odour Audit (Final Report dated July 2019) were made and have not been addressed. Cleanaway are awaiting lodgment of an odour survey deferral request from by The Odour Unit and are awaiting feedback from Secretary on the Odour Audit Report.</p>	<p>Given the odour audit was commenced within 6 months of the commencement of the operations, and a timeline for implementation of the recommendations is being negotiated with the Department, we have considered the proponent is compliant with this requirement.</p>		Compliant
B13	<p>Within two months of commissioning this audit, the Applicant shall submit a copy of the audit report to the Secretary, EPA and Penrith City Council, together with its response to any recommendations contained in the audit report.</p>	<p>The Annual Review for Erskine Park Resource Management Facility – Stage 1 – Waste Transfer Facility (report dated November 2019) identified a non-compliance with SSD 7075 condition B13, as the Odour Audit Report was not submitted to DPIE and Council within the required timeframe.</p>	<p>Odour Audit Report not submitted to DPIE and Council within the required timeframe.</p>		Non-compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B14	The Applicant shall comply with any requirement(s) of the Secretary arising from the Odour Audit.	A number of recommendations from the Erskine Park Resource Management Facility Waste Transfer Station Odour Audit (Final Report dated July 2019) were made and have not been addressed. Cleanaway are awaiting lodgment of an odour survey deferral request from by The Odour Unit and are awaiting feedback from Secretary on the Odour Audit Report.	Given the recommendations from the Odour Audit are being negotiated with the Department, we have considered the proponent is compliant with this requirement.		Compliant
	Pollution of Waters				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B15	The Development shall comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	<p>Site inspection by the Auditors on 06/04/20 found that concrete hardstand areas had sediment build up from the movement of heavy vehicles into and out of the Waste Transfer Station, potentially impacting on stormwater quality.</p> <p>Landscaped areas around the south of the facility were poorly vegetated, with exposed soils, showing accumulation of sediment around pits and sediment fences.</p> <p>Movement of sediment and litter was also observed across the site and onto the hardstand of the Waste Transfer Station (southern side). Furthermore, there was evidence soil tracking onto the front entry of the site via vehicles accessing an unsealed area where skip bins and equipment are being stored (Stage 2 future development area).</p>	<p>The OEMP and Appendix F (Stormwater Maintenance and Operations Plan) needs to be updated to include procedures for regular sweeping of hardstand areas (e.g. daily) to reduce the potential for stormwater pollutants leaving the site.</p> <p>Daily inspections need to be done to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>A programmed maintenance schedule for inspection, monitoring and maintenance of stormwater quality improvement devices installed at the facility needs to be developed, to ensure devices are adequately maintained.</p>		Non-compliant
	Stormwater				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B16	A stormwater management scheme must be prepared for the development and must be implemented in consultation with the EPA. Implementation of the scheme must mitigate the impacts of stormwater run-off from and within the premises following the completion of construction activities. The scheme should be consistent with the Stormwater Management Plan for the catchment.	The Erskine Park Transfer Station – Stage 1 Stormwater Maintenance and Operations Plan (Report dated 11 April 2018) was sighted by the Auditors	Site is compliant with this condition.		Compliant
	Leachate Management System				
B17	Prior to operation, the Applicant shall prepare a Leachate Management System for the Site, the system must: <ul style="list-style-type: none"> (a) be designed by a suitably qualified and experienced person(s) in consultation with the EPA; (b) provide a management protocol for leachate (including firewater); (c) control leachate (including firewater) so that it does not mix with any stormwater on the Site; and (d) include water quality monitoring to determine the performance of the leachate management system. 	The Erskine Park Transfer Station – Stage 1 Leachate Management Protocol (Report dated 11 April 2018) was sighted by the Auditors.	Site is compliant with this condition.		Compliant
B18	The Applicant shall carry out the Development in accordance with the Leachate Management System approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary	Site inspection by the Auditors on 06/04/20 found that the leachate management system was being managed in accordance with Appendix G of the OEMP.	Site is compliant with this condition.		Compliant
B19	Should the Waste Transfer Station no longer be able to utilise the adjacent Landfill Leachate Treatment System, no further waste shall be received at the Site until an alternative strategy for leachate management is provided in accordance with Condition B17. The system shall be designed and installed in consultation with the EPA and subject to the Secretary's approval prior to the facility receiving or processing any further waste.	None	This condition is not relevant to the current Audit period.		Not Triggered
	Erosion and Sediment Control				
B20	The Applicant shall implement erosion and sediment control measures on-site in accordance with Managing Urban Stormwater: Soils and Construction Vol. 1 (Landcom, 2004).	The Erskine Park Waste Stage 1 - Waste Transfer Station Erosion and Sediment Control Plan (dated 9 June 2017) as Appendix I of the Construction Environmental Management	The OEMP and Appendix F (Stormwater Maintenance and Operations Plan) needs to be updated to include procedures for regular		Non-compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
		<p>Plan was sighted by the Auditors.</p> <p>Site inspection by the Auditors on 06/04/20 generally found that concrete hardstand areas had sediment build up from the movement of heavy vehicles into and out of the Waste Transfer Station, potentially impacting on stormwater quality.</p> <p>Landscaped areas around the south of the facility were poorly vegetated, with exposed soils, showing accumulation of sediment around pits and sediment fences.</p> <p>Movement of sediment and litter was also observed across the site onto the hardstand of the Waste Transfer Station (southern side). Furthermore, there was evidence of soil tracking onto the front entry of the site via vehicles accessing an unsealed area where skip bins and equipment are being stored (Stage 2 future development area).</p>	<p>sweeping of hardstand areas (e.g. daily) to reduce the potential for stormwater pollutants leaving the site.</p> <p>An effective inspection schedule needs to be developed e.g. weekly/monthly to be confirmed by recorded management review to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>A programmed maintenance schedule for inspection, monitoring and maintenance of stormwater quality improvement devices installed at the facility needs to be developed, to ensure devices are adequately maintained.</p>		
	Bunding				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B21	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007.	Site inspection by the Auditors on 06/04/20 found that a small area under the awning near the entry to the Waste Transfer station was being used for storage of diesel fuel additive (AdBlue) on a self-bunded pallet.	All chemicals to be installed on appropriate bunding. The development of regular risk based documented inspections to check bunding compliance e.g. weekly/monthly should be a consideration to verify the requirement for ongoing compliance to license conditions.		Compliant
	Imported Soil				
B22	The Applicant shall: (a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the Site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Department upon request.	Surplus fill was sent off site during construction works and was sent to the landfill as daily cover. EPA approval for this activity was cited (letter dated 4/12/2017). No fill was required to be brought into the site.	Site is compliant with this condition.		Compliant
	Compliance Certificate				
B23	A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water prior to the commencement of construction.	Appendix D of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated October 2018) provides the Section 73 Compliance Certificate	Site is compliant with this condition.		Compliant
	Groundwater Interception and Extraction				
B24	The Applicant shall obtain any necessary water related approvals from DPI in the event that groundwater is likely to be intercepted or extracted during construction.	The findings of this audit	None		Not Triggered

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)																	
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status													
	CONTAMINATION																
B25	Prior to commencing any excavation works, the Applicant shall prepare a protocol for the management of unexpected contamination finds which details the procedures for testing, classifying, handling, storing and disposing of contaminated water, soils and/or groundwater if encountered in excavations, in particular during excavation of the stormwater detention basin.	Section 4.10 of the Construction Environmental Management Plan (dated November 2018) provides an Unexpected Finds Protocol for archaeological or Aboriginal objects.	Site is compliant with this condition.	Compliant													
B26	The Applicant shall notify the Department detailing any contamination investigation carried out. This report shall be provided to the Department on completion of construction earthworks.	The Auditors sighted the Fill Assessment and Characterisation Report: 85-87 Quarry Road, Erskine Park, NSW (report dated, 5 December 2017) prepared by Eugene Godfrey Commercial & Industrial Property Pty Ltd.	Site is compliant with this condition.	Compliant													
	NOISE AND VIBRATION																
	Vibration Criteria																
B27	The Applicant shall ensure that vibration resulting from the Development does not exceed the continuous or impulsive vibration criteria in EPA’s Assessing Vibration: A Technical Guideline (February 2006) at residential receivers.	Vibration monitoring is not required to be undertaken at the site. Monitoring will be done if any complaints are received.	Site is compliant with this condition.	Compliant													
	Construction and Operation Hours																
B28	The Applicant shall comply with the construction and operation hours in Table 3 unless otherwise agreed to in writing by the Secretary. <div>Table 3: Hours of Construction and Operation<table><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday – Friday</td><td>5 am to 6 pm</td></tr><tr><td>Saturday</td><td>5 am to 5 pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td>Operation</td><td colspan="2">24 hours a day, seven days a week</td></tr></table></div>	Activity	Day	Hours	Construction	Monday – Friday	5 am to 6 pm	Saturday	5 am to 5 pm	Sunday & Public Holidays	Nil	Operation	24 hours a day, seven days a week		The findings of this audit	Site is compliant with this condition.	Compliant
Activity	Day	Hours															
Construction	Monday – Friday	5 am to 6 pm															
	Saturday	5 am to 5 pm															
	Sunday & Public Holidays	Nil															
Operation	24 hours a day, seven days a week																
	Noise Mitigation																

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
B29	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development; (b) minimise the noise impacts of the Development during adverse meteorological conditions; (c) install and implement broadband squawker reversing alarms for all construction vehicles; (d) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and (e) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent. 	<p>Section 4.4 of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated October 2018) provides operational controls that will be implemented at the site to control noise.</p> <p>Site inspection by the Auditors on 06/04/20 found that the noise was managed in accordance with the OEMP.</p>	Site is compliant with this condition.	Compliant
	TRAFFIC AND ACCESS			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
B30	<p>The Applicant shall ensure that:</p> <ul style="list-style-type: none"> (a) a total of 37 car parking spaces, including one disabled car parking space are provided; (b) trucks shall only be parked in the designated truck park areas as identified in Appendix 1B; (c) at least one load compliance inspection parking area is provided; (d) Site access, driveways and parking areas are constructed and maintained in accordance with the latest versions of Australian Standards AS 2890.1, AS 2890.2, AS 2890.6 and AS 1428.1; (e) the swept path of the longest vehicle entering and exiting the Site, as well as manoeuvrability through the Site, is in accordance with AUSTROADS Guide to Road Design; (f) unless such deliveries are via Erskine Park Road, truck deliveries and pickups are scheduled to avoid busy morning and afternoon peak hours; (g) the egress of B-double waste transportation trucks from the Erskine Park Industrial Estate is confined to Lenore Drive/Erskine Park Link Road; (h) the Development does not result in any vehicles parking or queuing on the public road network; (i) all vehicles are wholly contained on-site before being required to stop; (j) all loading and unloading of heavy vehicles occurs inside the Waste Transfer Station; (k) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; (l) all vehicles enter and leave the Site in a forward direction; (m) signage is installed to ensure traffic from the adjacent landfill provides right-of-way to the Development traffic; and (n) right-of-way signage is installed at accessway road junctions from the adjacent landfill. 	<p>Site inspection by the Auditors on 06/04/20 found that provisions for parking for passenger and heavy vehicles was in accordance approved plans, and compliance with all other conditions was observed.</p>	<p>Site is compliant with this condition.</p>	<p>Compliant</p>
	FIRE MANAGEMENT			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Compliance Status
B31	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement suitable measures to minimise the risk of fire on-site including but not limited to the recommendations in the EIS; (b) extinguish any fires on-site promptly; and (c) maintain adequate fire-fighting capacity on-site. 	<p>Site has a Pollution Incident Response Management Plan in place (Appendix K of OEMP).</p> <p>Provisions for storage of firewater in the event of a fire incident is documented in the Stormwater Maintenance and Operations Plan (Appendix F of OEMP) and the Leachate Management Plan (Appendix G of OEMP).</p> <p>The site's Emergency Management Plan was cited (dated 11/02/20). This plan outlines emergency response actions in the event of fire/explosion and other emergency conditions.</p>	Site is compliant with this condition.	Compliant
	VISUAL AMENITY			
	Building Materials and Landscaping			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B32	<p>Prior to the commencement of construction, the Applicant shall prepare a Building and Material Schedule and a Landscape Plan for the development to the satisfaction of the Secretary. The Schedule and Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Council; (b) be consistent with the Penrith City Council Development Control Plan 2014; (c) include a building materials list for the Waste Transfer Station; (d) provide details on boundary fences which shall generally have a maximum height of 2.1 m and have an "open" nature, e.g. decorative metal and coloured dark grey or black, or complement the adjacent fencing type, other than the southern boundary fence which may be higher than 2.1m and impermeable, as agreed with the adjacent property owner; and (e) include details on landscaping, in particular how the area allocated for the Resource Recovery Facility will be grassed and stabilised prior to commencement of operation of the Waste Transfer Station to prevent any run-off and erosion. 	<p>The Material Schedule and a Landscape Plan for the development stamped 24/10/18 were sighted by the Auditors</p>	<p>Site is compliant with this condition.</p>		Compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B33	The Applicant shall carry out the Development in accordance with the approved Building and Material Schedule and Landscape Plan (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	<p>Site audit on 06/04/20 noted that the development was largely completed in accordance with the Building and Material Schedule.</p> <p>Whilst the 2019 Annual Review report documents that landscaping and cut and fill slope revegetation was successfully completed across the site in accordance with the approved Landscape Plan in December 2018, the success of landscaping has been affected by drought. Replanting of shrubs and turf, and increased use of mulch will help increase the success and survival rates of landscaping around the development.</p> <p>Areas along the western and southern areas of the site were very weedy and were not well maintained. Landscaped areas also contained significant litter and building waste, which require removal.</p>	<p>A maintenance program for landscaped areas should be put into place to ensure the actions under the Landscape Plan are implemented.</p> <p>Current Landscape Plan addresses site establishment and not ongoing maintenance of landscaped areas.</p> <p>Recommend the Landscape Plan is updated to contain a post-establishment maintenance program, including monitoring and reporting of compliance with the plan.</p>		Non-compliant
	Lighting				
B34	All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with Australian Standard AS 4282 1997.	Site audit on 06/04/20 noted that external lighting was generally in accordance with Section 4.8 of the OEMP.	Site is compliant with this condition.		Compliant
	Signage				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
B35	<p>The Applicant shall install any new signage in consultation with Council and shall comply with the State Environmental Planning Policy 64 – Advertising and Signage, as relevant.</p> <p><i>Note: This condition does not apply to signage identified as exempt or complying development in State Environmental Planning Policy (Exempt and Complying Development Codes) 2008.</i></p>	The Auditors sighted a copy of the email approval from Penrith City Council.	Penrith City Council approved the proposed signage under SEPP64 on 29/11/18.		Compliant
	HERITAGE				
B36	<p>The Applicant shall cease all works on-site in the event that any Aboriginal cultural object(s) or human remains are uncovered. If human remains are uncovered, you must immediately stop work, not further disturb the remains and notify NSW Police. OEH and the Aboriginal community must be contacted if the remains are suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, you must immediately stop work, not further disturb the objects and notify OEH by calling Environment Line on 131 555. Works must not resume in the designated area until the relevant written consent is received from NSW Police and/or OEH. Any Aboriginal objects discovered must be registered on the Aboriginal Heritage Management Information System (AHIMS), in accordance with section 89A of the National Parks and Wildlife Act 1974.</p>	<p>Applicant has advised that no Aboriginal Cultural objects or human remains were uncovered during excavation and construction works.</p> <p>Advice from Mr Paul Antony, NSW Engineering Manager, Cleanaway.</p>	Site is compliant with this condition.		Compliant
	SECURITY				
B37	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) install and maintain a perimeter fence and security gates on the Site; and (b) ensure that the security gates on-site are locked whenever the Site is unattended. 	Site inspection by the Auditors on 06/04/20 showed perimeter security fencing was in place around the entire site. Security gates observed at site entrance and site management advised site is fully locked in evenings.	Site is compliant with this condition.		Compliant
	PEST, VERMIN & NOXIOUS WEED MANAGEMENT				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Compliance Status
B38	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement suitable measures to manage pests, vermin and declared noxious weeds on-site; and (b) inspect the Site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on-site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in surrounding areas. 	<p>Site inspection by the Auditors on 06/04/20 found numerous pest and vermin baiting systems in place around and inside the Waste Transfer Station, and no pests or vermin were observed either inside of outside of the Waste Transfer Station.</p> <p>An assessment of Noxious weeds was beyond the scope of the audit, though landscaped areas require maintenance and weeding consistent with the Landscape Plan.</p>	Site is compliant with this condition.	Compliant
PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
	ENVIRONMENTAL MANAGEMENT			
	Construction Environmental Management Plan			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
C1	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) describe all activities to be undertaken on the Site during construction, including a clear indication of construction stages; (c) identify the statutory approvals that apply to the Development; (d) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management, dust management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment; (e) detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts; (f) describe the roles and responsibilities for all relevant employees involved in construction; (g) include arrangements for community consultation and complaints handling procedures during construction; and (h) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent. 	The Construction Environmental Management Plan (dated November 2018) was sighted by the Auditors.	Site is compliant with this condition.		Compliant
C1A	<p>Prior to commencement of extended construction hours approved as part of MOD 4, the Applicant must submit a revised Construction Environmental Management Plan to the satisfaction of the Planning Secretary. The plan must be prepared in consultation with the EPA and detail the environmental management practices and procedures to mitigate construction noise impacts during the out of hours construction periods.</p>	The original Construction Environmental Management Plan (dated September 2017) was updated to respond to a new condition as a result of Modification (Mod) 4 to Development Consent SSD 7075. The Construction Environmental Management Plan (dated November 2018) was sighted by the Auditors.	Site is compliant with this condition.		Compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
C2	The Applicant shall carry out the development in accordance with the Construction Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	<p>The Construction Environmental Management Plan (dated November 2018) was sighted by the Auditors.</p> <p>The applicant advised that the development was carried out in accordance with the Construction Environmental Management Plan.</p>			
	Operational Environmental Management Plan				
C3	<p>The Applicant shall prepare an Operational Environmental Management Plan for the Development to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none">(a) be prepared by a suitably qualified and experienced person(s);(b) provide a strategic framework for environmental management of the Development;(c) identify the statutory approvals that apply to the Development;(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;(e) describe in detail how the environmental performance of the Development would be monitored and managed; and(f) describe the procedures that would be implemented to:(g) keep the local community and relevant agencies informed about the operation and environmental performance of the Development;(h) receive, handle, respond to, and record complaints;(i) resolve any disputes that may arise;(j) respond to any non-compliance; and(k) respond to emergencies. <p>The Applicant shall carry out the Development in accordance with the Operational Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary</p>	<p>The Operational Environmental Management Plan (dated October 2018) was sighted by the Auditors.</p>	<p>Site is compliant with this condition.</p>	Compliant	
	Management Plan Requirements				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
C4	<p>The Applicant shall ensure that the environmental management plans/strategies required under this consent are prepared in accordance with any relevant guidelines and include:</p> <ul style="list-style-type: none"> (a) detailed baseline data; (b) a description of: <ul style="list-style-type: none"> i. the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. any relevant limits or performance measures/criteria; iii. the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; iv. the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (c) a program to monitor and report on the: <ul style="list-style-type: none"> i. impacts and environmental performance of the Development; ii. effectiveness of any management measures; iii. a contingency plan to manage any unpredicted impacts and their consequences; iv. a program to investigate and implement ways to improve the environmental performance of the Development over time; (d) a protocol for managing and reporting any: <ul style="list-style-type: none"> i. incidents; ii. complaints; iii. non-compliances with statutory requirements; iv. exceedances of the impact assessment criteria and/or performance criteria; and v. a protocol for periodic review of the plan. 	The relevant environmental management plans / strategies are contained within the Operational Environmental Management Plan (dated October 2018) which was sighted by the Auditors.	Site is compliant with this condition.	Compliant
C5	The Secretary may waive some of the requirements in Condition C4 if they are unnecessary or unwarranted for particular management plans/strategies.	The findings of this audit	None	Not Triggered
	REPORTING AND AUDIT			
	Incident Reporting			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
C6	The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies including EPA and Penrith City Council of any incident that has caused, or threatens to cause, material harm to the environment or result in offensive odour at sensitive receivers. For any other incident (including complaints) associated with the Development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	The Annual Review for Erskine Park Resource Management Facility – Stage 1 – Waste Transfer Facility (report dated November 2019) summarises the environmental performance of the facility.	No reportable incidents or exceedances occurred during the reporting period.		Compliant
	Regular Reporting				
C7	The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Environmental performance data is located at https://www.cleanaway.com.au/sustainable-future-hub/earth/environmental-management/	Site is compliant with this condition.		Compliant
	Independent Environmental Audit				
C8	Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: <ul style="list-style-type: none"> (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) led by a suitably qualified auditor, and include experts in fields specified by the Secretary; (c) include consultation with the relevant agencies; (d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals); (e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and (f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents. 	This Independent Audit of the environmental performance of the development was conducted on 6 April 2020 and covered the period between December 2018 and November 2019.	The Independent Environmental Audit was successfully completed.		Compliant

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)				
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and Compliance Status
C9	Within three months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report	None	This condition is not relevant to the current Audit period.	Not Triggered
	Annual Review			
C10	<p>Within 1 year of the date of this consent, and every year thereafter, the Applicant must review the environmental performance of the Development. This review must:</p> <ul style="list-style-type: none"> (a) describe the activities associated with the Development that were carried out in the previous calendar year, and the activities proposed to be carried out over the next year; (b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of the results against the: <ul style="list-style-type: none"> i. the relevant statutory requirements, limits or performance measures/criteria; ii. requirements of any plan or program required under this consent; iii. the monitoring results of previous years; and iv. the relevant predictions in the EIS; (c) identify any non-compliance over the previous year, and describe what actions were (or are being) taken to ensure compliance in the upcoming year; (d) identify any trends in the monitoring data over the life of the Development; (e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the Development. 	The Annual Review for the Erskine Park Resource Management Facility – Stage 1 – Waste Transfer Facility (report dated November 2019) was sighted by the Auditors.	Site is compliant with this condition.	Compliant
	Revision of Strategies, Plans and Programs			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3 and 4)					
Consent Condition	Requirement	Evidence collected	Independent Findings and Recommendations	Audit and	Compliance Status
C11	<p>Within 3 months of the submission of an:</p> <ul style="list-style-type: none"> (a) annual review under Condition C10 above; (b) incident report under Condition C6 above; (c) audit under Condition C8 above; or (d) any modification to this consent, <p>the Applicant shall review, and if necessary, revise, the strategies, plans, and programs required under this consent.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</i></p>	A number of recommendations from the Erskine Park Resource Management Facility Waste Transfer Station Odour Audit (Final Report dated July 2019) were made and have not been addressed. Cleanaway are awaiting lodgment of an odour survey deferral request from by The Odour Unit and are awaiting feedback from Secretary on the Odour Audit Report.	<p>A timeframe for implementation of the findings from the Odour Audit are currently being negotiated with the Department.</p> <p>If it expected that a review of strategies, plans and programs will be done once actions and timeframes are agreed.</p>		Compliant
C12	The Applicant shall ensure that the operation of the Development is undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary.	Site inspection.	Site is compliant with this condition.		Compliant
C13	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) make copies of the following publicly available on its website: <ul style="list-style-type: none"> i. the documents referred to in Condition A1; ii. all current statutory approvals for the Development; iii. all approved strategies, plans and programs required under the conditions of this consent; iv. a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; v. a complaints register, updated on a monthly basis; vi. the annual reviews of the Development; vii. any independent environmental audit of the Development, and the Applicant's response to the recommendations in any audit; viii. any other matter required by the Secretary; and (b) keep this information up to date. 	Documents are available at https://www.cleanaway.com.au/erskine-park-community-information-nsw/	Site is compliant with this condition.		Compliant

Appendix D – Environment Impact Assessment – Statement of Commitments

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	GENERAL			
7.11.5	A Construction Environmental Management Plan (CEMP) will be prepared for the Development, with sub-plans for specific environmental risk areas, including but not limited to noise, dust and traffic issues.	The Construction Environmental Management Plan (dated November 2018) and relevant subplans were sighted by the Auditors	Site is compliant with this condition.	Compliant
7.11.5	A site-specific Operational Environmental Management Plan (OEMP) will be developed and submitted to DP&E for approval. The OEMP will ensure that the commitments made within the EIS, along with the conditions imposed by the development consent and EPL, are fully implemented and complied with. The OEMP will establish the framework for managing and mitigating the potential environmental impacts of the Development over the life of the operation.	The Operational Environmental Management Plan (dated October 2018) was sighted by the Auditors.	Site is compliant with this condition.	Compliant
	AIR QUALITY AND ODOUR			
7.1.5	A program of construction air quality monitoring will be implemented.	Figure of the 2018 and 2019 Annual Review report prepared by SLR Consulting shows the construction air quality monitoring (references D10, D11 and D12).	Site is compliant with this condition.	Compliant

<p>7.1.5</p>	<p>An air pollution control system will be implemented to provide multiple levels of control and an integrated solution for emission control. The system will include:</p> <ul style="list-style-type: none"> • Containment: containment of dust and odour within the building using fast acting doors and an air extraction system; • Internal air management: the installation of a dust suppression system to control internal dust concentrations; • Air pollution control: the operation of a wet scrubber, required to achieve the 'design standard' with the plant operating at full capacity in the 'normal operations' scenario, or during the 'emergency operations' scenario; and • Emission control: the use of dilution fans to maximise the dispersion and dilution of the extracted, and scrubbed, air. 	<p>The key design features of the Air Pollution Control System are:</p> <ul style="list-style-type: none"> • A modern weighbridge; • Three fast-acting roller doors to facilitate truck movement in and out of the WTS • A motorised fresh make-up building louvre system that facilitates the action of Tri-stack System; • Full containment and extraction of internal building air via a Tri-stack system • A scrubber system capable of fully servicing the design airflow of one of the three identical Tri-stack fan units; • A process control room, consisting of a supervisory control and data acquisition (SCADA) system, responsible for the monitoring and control of the Tri-stack and scrubber systems; • A mechanical shredding and sorting line; and • A truck loading area that is fully enclosed as part of the normal operation of the WTS building. <p>Site inspection by the Auditors on 06/04/20 found that no odour was detectable outside the Waste Transfer Station. Evidence suggest mitigation</p>	<p>Site is compliant with this condition.</p>	<p>Compliant</p>
--------------	--	--	---	-------------------------

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		measures in place and the odour control system was performing adequately.		
7.1.5	Within the first 12 months of operations, monitoring of odour will be undertaken to perform efficiency trials on the scrubber system to demonstrate optimal performance. Cleanaway will also undertake follow-up monitoring during the operational lifetime of the WTS, on a basis to be agreed with the relevant authorities.	The Erskine Park Resource Management Facility Waste Transfer Station Odour Audit (Final Report dated July 2019) was sighted by the Auditors.	Site is compliant with this condition.	Compliant
	NOISE AND VIBRATION			
-	Other than the noise mitigation achieved by the enclosed nature of the building design, no additional noise mitigation measures are warranted.	None	None	Not Triggered
RTS 3.4	Cleanaway owned vehicles operating on the site will be fitted with the High and Low Buzzer system, designed to minimise noise associated with reversing alarms in accordance with the Australian Vehicle Standard (Australian Design Rule 42/04) and Heavy Vehicle National Law Act 2012.	The Auditors conducted a site inspection on 06/04/20 and heavy vehicles entering the Waste Transfer Station during the site visit complied with this requirement. Advice from site management is that all vehicles comply with this requirement.	Site is compliant with this condition.	Compliant
RTS 3.4	All mobile plant operation will occur inside the WTS building and will be fitted with low frequency white noise reversing alarms.	The Auditors conducted a site inspection on 06/04/20 and mobile plant within the Waste Transfer Station during the site visit complied with this requirement.	Site is compliant with this condition.	Compliant
	TRAFFIC AND TRANSPORT			
7.3.5	The Construction Traffic Management Plan will be updated in response to pre-construction approvals required as part of the Conditions of Approval. This will be implemented for the duration of construction activities.	No update was required.	None	Not Triggered

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.3.5	Cleanaway will schedule its delivery and transfer trucks to avoid the busy morning and afternoon peak hours.	Section 4.3 of the Operational Environmental Management Plan (dated October 2018) addressed this requirement and has been cited by the Auditors. The Auditors conducted a site inspection on 06/04/20 and observed compliance with this condition.	Site is compliant with this condition.	Compliant
7.3.5	Transfer trucks departing the site will use the Erskine Park Link Road connection to the M7 rather than the Mamre Road or Erskine Park Road routes to the M4.	Section 4.3 of the Operational Environmental Management Plan (dated October 2018) addressed this requirement and has been cited by the Auditors.	Wettenhaults are the contractor for Quad Axle Single Trailer bulk waste transfers. They have obtained a PBS approval to use the approved route. Vehicle monitoring is done, data to be provided by contractor.	Compliant
RTS 3.4	Designated pedestrian access will be provided from Quarry Road to the offices.	Site Inspection	Pedestrian access path observed during site inspection on 25/05/20. Site photo taken.	Compliant
RTS 3.4	Any existing unnecessary property access will be removed, the kerb reinstated to suit the existing kerb, and the verge area reinstated with grass seeded topsoil or turf, which will be addressed in further designed stages.	The Auditors conducted a site inspection on 06/04/20 and observed compliance with this condition.	Site is compliant with this condition.	Compliant
	VISUAL AMENITY			
7.4.5	Lighting will be designed and installed in accordance with AS 4282- 1997 to avoid obtrusive effects to surrounding residents.	None	Site is compliant with this condition.	Compliant
7.4.5	Disturbed areas will be rehabilitated on completion of construction.	Site inspection by the Auditors on 06/04/20 found that applicant complied with this condition.	Site is compliant with this condition.	Compliant

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.4.5	Mature trees will be fenced and protected for the duration of construction.	None	This condition is not relevant to the current Audit period.	Not Triggered
7.4.5	Landscape works will be implemented as part of the Development.	<p>Site inspection by the Auditors on 06/04/20 found that landscaped areas around the south of the facility were poorly vegetated.</p> <p>Whilst the 2019 Annual Review report documents that landscaping and cut and fill slope revegetation was successfully completed across the site in accordance with the approved Landscape Plan in December 2018, the success of landscaping has been affected by drought. Replanting of shrubs and turf, and increased use of mulch will help increase the success and survival rates of landscaping around the development.</p> <p>Other areas of the site along the northern boundary showed litter and building waste in the landscaped area, inconsistent with the approved Landscape Plan (Appendix I of the OEMP).</p>	A programmed maintenance schedule for inspection, monitoring and maintenance of landscaped areas is required.	Non-compliant
RTS 3.4	Further detail on the architectural treatment of the facility will be provided as the detailed design progresses.	None	None	Not Triggered

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
RTS 3.4	Black palisade fencing located behind landscaping fronting on to Quarry Road will be provided.	Site inspection by the Auditors on 06/04/20 found that applicant complied with this condition.	Site is compliant with this condition.	Compliant
RTS 3.4	Upon completion of the WTS, the undeveloped RRF area will be grassed until such time as construction can commence on the second stage.	Site inspection by the Auditors on 06/04/20 found that the area of Stage 2 was largely unvegetated, and was being used for bin storage. Establishment of grass is required consistent with Appendix I (Landscape Plan) of the OEMP to control sediment generation from this area.	Establishment of grass is required consistent with Appendix I (Landscape Plan) of the OEMP to control sediment generation from this area.	Non-compliant
	Indigenous Heritage			
7.5.3	Should any Aboriginal artefact be uncovered during construction or operation all works will cease in that locale and the OEHL will be notified. Works will only recommence when an appropriate and approved management strategy has been agreed to by all of the relevant stakeholders.	None	None	Not Triggered
	SOILS AND GEOLOGY			

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.6.4	Cut and fill slopes will be battered or retained for stability and to reduce the risk of erosion.	Site inspection by the Auditors on 06/04/20 found that the batters on the south of the facility were poorly vegetated, with exposed soils, showing accumulation of sediment around pits and sediment fences.	<p>An effective formal risk-based inspection schedule is required e.g. weekly/monthly inspections that need to be done to check on sediment accumulation on the hardstand. This along with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation should assist in effectively managing the issue and confirm compliance. The formal management review and recording of status of the inspections also needs to occur.</p> <p>A programmed maintenance schedule for inspection, monitoring and maintenance of landscaped areas is required to ensure they are sufficiently vegetated to prevent erosion.</p>	Non-compliant
7.6.4	An Erosion and Sediment Control Plan (ESCP) will be prepared as part of the CEMP setting out detailed measures for the management of erosion and sediment.	The Erskine Park Waste Stage 1 - Waste Transfer Station Erosion and Sediment Control Plan (dated 9 June 2017) as Appendix I of the Construction Environmental Management Plan was sighted by the Auditors	Site is compliant with this condition.	Compliant

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.6.4	A program of groundwater monitoring would be undertaken, building on the ongoing groundwater monitoring program undertaken for the landfill.	Groundwater monitoring reports are located at: https://www.cleanaway.com.au/erskine-park-community-information-nsw/	Site is compliant with this condition.	Compliant
7.6.4	In the event that unexpected contaminated material is encountered during construction excavations: <ul style="list-style-type: none"> An environmental management plan will be developed and implemented; and A suitably qualified environmental consultant will be consulted to assess any unexpected conditions or subsurface facilities discovered during the proposed earthworks. 	<p>The auditors sighted a copy of report from DLA dated 5/12/2017 and booking no. for disposal dated 09/01/2018.</p> <p>One unexpected find, being asbestos during civil works occurred. Approximately 150m³ of asbestos contaminated soil was transported off site and disposed in the Erskine Park Landfill.</p>	Site is compliant with this condition.	Compliant
7.6.4	In the event that salinity is identified during construction the following measures will be considered: <ul style="list-style-type: none"> minimisation of exposure of saline and sodic soils in temporary faces or stockpiles during site preparation works; and the collection and controlled discharge of stormwater from hard surfaces such that the potential for localised ponding or waterlogging is minimised. 	None	None	Not Triggered
	SURFACE WATER			
7.7.5	An Erosion and Sediment Control Plan (ESCP) will be prepared as part of the CEMP setting out detailed measures for the management of erosion and sediment.	The Erskine Park Waste Stage 1 - Waste Transfer Station Erosion and Sediment Control Plan (dated 9 June 2017) as Appendix I of the Construction Environmental Management Plan was sighted by the Auditors	Site is compliant with this condition.	Compliant

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.7.5	Storage of hazardous materials during construction such as oils, chemicals and refuelling activities will occur in bunded areas.	Provisions for the storage of oils, chemicals and refuelling activities is provided in the Construction Environmental Management Plan (dated November 2018).	Site is compliant with this condition.	Compliant
7.7.5	Water quality monitoring of water within the sediment basins will be carried out during the construction phase in accordance with the CEMP.	Section 7.1 of the 2018 and 2019 Annual Review prepared by SLR Consulting provide results of the water quality monitoring of water within the sediment basins. Surface water monitoring was not undertaken at the site as there were no controlled discharges.	Site is compliant with this condition.	Compliant
7.7.5	A minimum of 740 m ³ of OSD will be provided within an underground tank and above ground storage within the detention basin.	The auditors sighted Construction Certificate Plans from CIP (OSD Tank and Sections Plan, Plan No. C013523.00-C44; Stormwater Drainage Plan, Plan No. C013523.00-C41) showing total storage of OSD tank and pond to be 710m ³ . Copy of Installation Certificate for installation of the non-potable rainwater reuse system was also sighted (Clark McKay Pty Ltd, dated 06/12/2018).	Note under the SSD Mod 1 approval, the approved storage was reduced from 740m ³ to 710m ³ .	Compliant

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.7.5	Rainwater harvesting tanks will be implemented, which will provide a minimum of 56 KL of water storage for supplying greywater for toilet flushing in the buildings.	The auditors sighted Construction Certificate Plans from CIP (OSD Tank and Sections Plan, Plan No. C013523.00-C44; Stormwater Drainage Plan, Plan No. C013523.00-C41) showing total storage of OSD tank and pond to be 710m ³ . Copy of Installation Certificate for installation of the non-potable rainwater reuse system was also sighted (Clark McKay Pty Ltd, dated 06/12/2018).	Note under the SSD Mod 1 approval, the approved storage was reduced from 740m ³ to 710m ³ .	Compliant
7.7.5	Cleanaway will develop a detailed maintenance and operations plan for the entire stormwater system in accordance with Penrith Councils WSUD Policy (PCC, 2013) and will be included within the OEMP.	The Erskine Park Transfer Station – Stage 1 Stormwater Maintenance and Operations Plan (Report dated 11 April 2018) was sighted by the Auditors	Site is compliant with this condition.	Compliant
	FLORA AND FAUNA			
-	Given the highly disturbed and artificial nature of the subject site at Erskine Park, there is no requirement for the implementation of any species-specific impact amelioration or environment management measures with respect to threatened or other native biota.	None	None	Not Triggered
	GREENHOUSE GAS			
7.9.4	The building will be designed to comply with all National Construction Code and Council requirements and a Section J Energy Efficiency Assessment will be performed prior to construction.	None	Site is compliant with this condition.	Compliant

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.9.4	<p>The following points would be considered to reduce the emissions caused from on-site electricity usage:</p> <ul style="list-style-type: none"> • A percentage of electricity could be generated on-site through the use of photovoltaic cells, for example; • Use of light sensors minimise lighting related electricity usage; and • Where possible, high efficiency lighting should be used. 	None	None	Not Triggered
7.9.4	<p>The following points should be considered to reduce the overall energy use from vehicles and stationary equipment:</p> <ul style="list-style-type: none"> • Variable frequency drive motor controls will be used on stationary equipment to minimise electricity consumption; • Waste transfer vehicles should leave the site with full loads to reduce the number of traffic movements required; • Waste transfer vehicle configuration should be designed to maximise waste transport efficiency; • All vehicles/plant and machinery should be turned off when not in use and regularly serviced to ensure efficient operation; and • Truck routes and loading capacity should be designed and optimised to reduce the distance and effort required by the vehicles. 	None	None	Not Triggered
	HAZARDS AND RISK			
-	<p>The SEPP 33 screenings for storage and transportation of dangerous goods indicates that the development is below the SEPP thresholds and therefore is not considered a hazardous or offensive development in accordance with the guidelines. As such a Preliminary Hazard Assessment is not required.</p>	None	None	Not Triggered
	SOCIO-ECONOMIC			
7.11.5	<p>A Community Information Strategy will be implemented throughout construction.</p>	<p>A Community Information Strategy was implemented under Section 5.5 of the Construction Environmental Management Plan (dated November 2018)</p>	<p>Site is compliant with this condition.</p>	Compliant
	WASTE MANAGEMENT			

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
6.12	All received waste will be transported off-site to an appropriately licensed waste management facility in accordance with relevant waste management regulations.	The Operational Waste Management Plan as a sub-plan to the Operational Environmental Management Plan (dated October 2018) was sighted by the Auditors.	Site is compliant with this condition.	Compliant
7.12.4	A Construction Waste Management Plan will be prepared setting out specific measures for the management of waste during the construction period.	The Construction Waste Management Plan as a sub-plan to the Construction Environmental Management Plan (dated November 2018) was sighted by the Auditors.	Site is compliant with this condition.	Compliant
7.12.4	An operation WMP will be implemented throughout the life of the operation and will be updated on a regular basis (e.g. annually) to ensure the Plan remains applicable.	The Operational Waste Management Plan as a sub-plan to the Operational Environmental Management Plan (dated October 2018) was sighted by the Auditors.	Site is compliant with this condition.	Compliant

Appendix E – Environment Protection Licence 20986

Conditions of EPL 20986 Erskine Park Waste Transfer Station																
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status												
1	Administrative Conditions															
A1	What the licence authorises and regulates															
A1.1	<div><p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p><p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p><table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Chemical storage</td><td>General chemicals storage</td><td>0 - 5000 kL storage capacity</td></tr><tr><td>Waste processing (non-thermal treatment)</td><td>Non-thermal treatment of general waste</td><td>Any annual processing capacity</td></tr><tr><td>Waste storage</td><td>Waste storage - other types of waste</td><td>Any other types of waste stored</td></tr></table></div>	Scheduled Activity	Fee Based Activity	Scale	Chemical storage	General chemicals storage	0 - 5000 kL storage capacity	Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity	Waste storage	Waste storage - other types of waste	Any other types of waste stored	Site Inspection	Site is compliant with this condition.	Compliant
Scheduled Activity	Fee Based Activity	Scale														
Chemical storage	General chemicals storage	0 - 5000 kL storage capacity														
Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity														
Waste storage	Waste storage - other types of waste	Any other types of waste stored														
A2	Premises or plant to which this licence applies															
A2.1	<div><p>The licence applies to the following premises:</p><p>ERSKINE PARK WASTE TRANSFER STATION 85-87 QUARRY ROAD ERSKINE PARK NSW 2759 LOT 1 DP 1140063</p></div>	Site Inspection	Site is compliant with this condition.	Compliant												
A3	Information supplied to the EPA															
A3.1	<div><p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to:</p><div><div>(a)</div><div>the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</div></div><div><div>(b)</div><div>the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</div></div></div>	The findings of this audit	Site is compliant with this condition.	Compliant												
2	Discharges to Air and Water and Applications to Land															
P1	Location of monitoring/discharge points and areas															

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area. (none listed)	None	The condition does not require any action.	Not Triggered
3	Limit Conditions			
L1	Pollution of waters			

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	<p>Site inspection by the Auditors on 06/04/20 generally found that concrete hardstand areas had sediment build up from the movement of heavy vehicles into and out of the Waste Transfer Station, potentially impacting on stormwater quality.</p> <p>Landscaped areas around the south of the facility were poorly vegetated, with exposed soils, showing accumulation of sediment around pits and sediment fences.</p> <p>Movement of sediment and litter was also observed across the site and onto the hardstand of the Waste Transfer Station (southern side). Furthermore, there was evidence soil tracking onto the front entry of the site via vehicles accessing an unsealed area where skip bins and equipment are being stored (Stage 2 future development area).</p>	<p>The OEMP and Appendix F (Stormwater Maintenance and Operations Plan) needs to be updated to include procedures for regular sweeping of hardstand areas (e.g. daily) to reduce the potential for stormwater pollutants leaving the site.</p> <p>Daily inspections need to be done to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>A programmed maintenance schedule for inspection, monitoring and maintenance of stormwater quality improvement devices installed at the facility needs to be developed, to ensure devices are adequately maintained.</p>	Non-compliant
L2	Waste			

Conditions of EPL 20986 Erskine Park Waste Transfer Station																			
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status															
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence.</p> <table border="1"> <thead> <tr> <th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr> </thead> <tbody> <tr> <td>NA</td><td>General solid waste (putrescible)</td><td>As defined in Schedule 1 of the POEO Act, as in force from time to time</td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr> <tr> <td>NA</td><td>General solid waste (non-putrescible)</td><td>As defined in Schedule 1 of the POEO Act, as in force from time to time</td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Waste processing (non-thermal treatment) Waste storage		NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Waste processing (non-thermal treatment) Waste storage		<p>Section 4.7 of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated October 2018) provides procedures to identify and separate waste that cannot be processed at the facility.</p>	<p>Site is compliant with this condition.</p>	<p>Compliant</p>
Code	Waste	Description	Activity	Other Limits															
NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Waste processing (non-thermal treatment) Waste storage																
NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Waste processing (non-thermal treatment) Waste storage																

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L2.2	No more than 300,000 tonnes of waste is to be received at the Premises per annum.	<p>The auditors sighted the weighbridge records from their WasteMan Weighbridge software.</p> <p>Total tonnage of waste received between the site opening (27 December 2018) and November 2019 was 185,458.93 tonnes. This data was provided by their WasteMan Weighbridge software.</p> <p>Example EPA WARRP reports were cited as well as monthly waste tonnages received.</p>	The amount of waste accepted at the Terminal during the audit period totaled 185,458.93 tonnes.	Compliant
L2.3	The amount of waste received at the Premises must be recorded (in tonnes) on a daily basis.	<p>The auditors sighted the weighbridge records from their WasteMan Weighbridge software.</p> <p>Total tonnage of waste received between the site opening (27 December 2018) and November 2019 was 185,458.93 tonnes. This data was provided by their WasteMan Weighbridge software.</p> <p>Example EPA WARRP reports were cited as well as monthly waste tonnages received.</p>	The amount of waste accepted at the Terminal during the audit period totaled 185,458.93 tonnes.	Compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L2.4	The authorised amount of waste permitted on the Premises must not exceed 1,040 tonnes at any one time	<p>The auditors sighted the weighbridge records from their WasteMan Weighbridge software.</p> <p>Total tonnage of waste received between the site opening (27 December 2018) and November 2019 was 185,458.93 tonnes. This data was provided by their WasteMan Weighbridge software.</p> <p>Example EPA WARRP reports were cited as well as monthly waste tonnages received</p>	Contingency plan if facility cannot accept waste includes Suez at Lucas Heights or Summerhill in Newcastle. A contract with Suez was cited, dated 01/07/2019 for backup waste disposal. Recommend this be included in the Operational Waste Management Plan	Compliant
L3	Noise Limits			
L3.1	Noise emissions from the Premises must be in compliance with the requirements of the NSW EPA's Industrial Noise Policy.	None	The EPL does not require monitoring	Not Triggered
L4	Hours of Operation			
L4.1	The hours of operation are 24 hours per day seven days a week.	None	None	Not Triggered
L5	Potentially Offensive Odour			
L5.1	<p>No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</p>	None	None	Not Triggered
4	Operating Conditions			

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O1	Activities must be carried out in a competent manner			
O1.1	Licensed activities must be carried out in a competent manner. This includes: (a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Site Inspection	Site is compliant with this condition.	Compliant
O2	Maintenance of plant and equipment			
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: (a) must be maintained in a proper and efficient condition; and (b) must be operated proper and efficient manner in a.	The auditors sighted the maintenance records for the Liebherr telehandler dated 7/12/19.	Site is compliant with this condition.	Compliant
O3	Dust			
O3.1	Trucks entering or leaving the Premises that are carrying loads must be covered, except during loading and unloading.	Section 5.2 of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated October 2018) provides operational controls that will be implemented at the site to control odours including driver training including covering loads at all times. Site inspection by the Auditors on 06/04/20 found that trucks entering and leaving the facility were covered at all times, except during unloading and loading within the building.	Site is compliant with this condition.	Compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O3.2	All vehicles leaving the Premises must not track dirt, sand or other materials onto public roads.	Site inspection by the Auditors on 06/04/20 found there was evidence of soil tracking onto the front entry of the site via vehicles accessing an unsealed area where skip bins and equipment are being stored (Stage 2 future development area). Tracking of soil onto Quarry Rd was evident.	<p>The OEMP and Appendix F (Stormwater Maintenance and Operations Plan) needs to be updated to include procedures for regular sweeping of hardstand areas (e.g. daily) to reduce the potential for stormwater pollutants leaving the site.</p> <p>Daily inspections need to be done to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>Establishment of grass is required consistent with Appendix I (Landscape Plan) of the OEMP to control sediment generation from the Stage 2 area.</p>	Non-compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O3.3	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<p>Section 4.2, Table 7 of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated October 2018) provides mitigation measures that will be implemented to manage dust.</p> <p>Site inspection by the Auditors on 06/04/20 within the Waste Transfer Station showed evidence of good internal dust control, with misting system in operation.</p> <p>Tracking of soil onto the concrete was observed to be a source of dust on the premises. Evidence of soil and sediment transfer from runoff from the landfill onto the hardstand areas of the Waste Transfer Station was observed, causing dust during high winds.</p>	<p>More frequent sweeping of concrete hardstand areas, particularly outside the Waste Transfer Station entry and exit points is required. Hardstand should be free of soil and sediment to avoid dust generation.</p> <p>Improved landscaping on grounds and the adjacent landfill area is required to prevent soil erosion from wind and water action.</p>	Non-compliant
O4	Other Operating Conditions			
O4.1	The licensee must ensure that any waste received and/or stored at the Premises is assessed and classified in accordance with the EPA's Waste Classification Guidelines as in force from time to time.	The Operational Waste Management Plan for the Erskine Park Waste Transfer Station – Stage 1 was sighted by the auditors	Waste is assessed in delivery vehicles that enter the site on the incoming weighbridge located adjacent to the office.	Compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
5	Monitoring and Recording Conditions			
M1	Monitoring records			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	None	The EPL does not require monitoring	Not Triggered
M1.2	All records required to be kept by this licence must be: (a) in a legible form, or in a form that can readily be reduced to a legible form; (b) kept for at least 4 years after the monitoring or event to which they relate took place; and (c) produced in a legible form to any authorised officer of the EPA who asks to see them.	None	The EPL does not require monitoring	Not Triggered
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: (a) the date(s) on which the sample was taken; (b) the time(s) at which the sample was collected; (c) the point at which the sample was taken; and (d) the name of the person who collected the sample.	None	The EPL does not require monitoring	Not Triggered
M2	Weather Monitoring			
M2.1	The Licensee must ensure that there is a suitable meteorological station on the Premises that complies with the requirements in the latest version of the Approved Methods of Sampling of Air Pollutants in New South Wales	Site Inspection done on 06/04/20 observed the meteorological station in place on the northern side of the site. The Auditors sighted the meteorological station data for the period 01 December 2018 to 30 November 2019	Site is compliant with this condition.	Compliant
M2.2	The Licensee must operate the meteorological station and maintain continuous, auditable records of meteorological data.	Site Inspection done on 06/04/20 observed the meteorological station in place on the northern side of the site. The Auditors sighted the meteorological station data for the period 01 December 2018 to 30 November 2019	Site is compliant with this condition.	Compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M3	Recording of pollution complaints			
M3.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	The Complaints Register is published on the site's website at: https://www.cleanaway.com.au/erskine-park-community-information-nsw/	Site is compliant with this condition.	Compliant
M3.2	The record must include details of the following: (a) the date and time of the complaint; (b) the method by which the complaint was made; (c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (d) the nature of the complaint; (e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and (f) if no action was taken by the licensee, the reasons why no action was taken.	The Complaints Register is published on the site's website at: https://www.cleanaway.com.au/erskine-park-community-information-nsw/	Site is compliant with this condition.	Compliant
M3.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	The Complaints Register is published on the site's website at: https://www.cleanaway.com.au/erskine-park-community-information-nsw/	Site is compliant with this condition.	Compliant
M3.4	The record must be produced to any authorised officer of the EPA who asks to see them.	The Complaints Register is published on the site's website at: https://www.cleanaway.com.au/erskine-park-community-information-nsw/	Site is compliant with this condition.	Compliant
M4	Telephone complaints line			

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M4.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Community Hotline – Feedback and Complaints maintained and is promoted on Cleanaway Home Page, https://www.cleanaway.com.au/ .	Site is compliant with this condition.	Compliant
M4.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Community Hotline – Feedback and Complaints maintained and is promoted on Cleanaway Home Page, https://www.cleanaway.com.au/ .	Site is compliant with this condition.	Compliant
M4.3	The preceding two conditions do not apply one (1) month after: the date of the issue of this licence.	None	None	Not Triggered
6	Reporting Conditions			
R1	Annual return documents			
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: <ol style="list-style-type: none"> 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	Annual Return was lodged with the EPA on 11/11/19 according to the POEO Public Register.	Site is compliant with this condition.	Compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.2	An Annual Return must be prepared in respect of each reporting period except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Annual Return was lodged with the EPA on 11/11/19 according to the POEO Public Register.	Site is compliant with this condition.	Compliant
R1.3	Where this licence is transferred from the licensee to a new licensee: (a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and (b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose	None	None	Not Triggered
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or (b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	None	None	Not Triggered
R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Annual Return was lodged with the EPA on 11/11/19 according to the POEO Public Register. Anniversary date for the licence is 18/09 each year. The applicant complied with this requirement.	Site is compliant with this condition.	Compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Applicant is aware of this condition.	Site is compliant with this condition.	Compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: (a) the licence holder; or (b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Annual Return was lodged with the EPA on 11/11/19 according to the POEO Public Register and was certified prior to submission.	Site is compliant with this condition.	Compliant
R2	Notification of environmental harm			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	The Annual Review for Erskine Park Resource Management Facility – Stage 1 – Waste Transfer Facility (report dated November 2019) summarises the environmental performance of the facility.	No reportable incidents or exceedances occurred during the reporting period.	Compliant
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	The Annual Review for Erskine Park Resource Management Facility – Stage 1 – Waste Transfer Facility (report dated November 2019) summarises the environmental performance of the facility.	No reportable incidents or exceedances occurred during the reporting period.	Compliant
R3	Written report			
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: (a) where this licence applies to premises, an event has occurred at the premises; or (b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Audit interview	None	Not Triggered
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Audit interview	None	Not Triggered

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R3.3	The request may require a report which includes any or all of the following information: (a) the cause, time and duration of the event; (b) the type, volume and concentration of every pollutant discharged as a result of the event; (c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; (d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; (e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; (f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and (g) any other relevant matters.	Audit interview	None	Not Triggered
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Audit interview	None	Not Triggered
7	General Conditions			
G1	Copy of licence kept at the premises or plant			
G1.1	A copy of this licence must be kept at the premises to which the licence applies	Site inspection by the Auditors on 06/04/20 observed the EPL on the premises. A copy of this licence is available on the site's website at: https://www.cleanaway.com.au/erskine-park-community-information-nsw/	Site is compliant with this condition.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	A copy of this licence is available	Site is compliant with this condition.	Compliant
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	A copy of this licence is available	Site is compliant with this condition.	Compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
8	Special Conditions			
E1	Financial assurance			
E1.1	A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by 30 January 2019.	Bank Guarantee for financial assurance in favour of the Environment Protection Authority in the amount of two hundred thousand dollars (\$200,000 was issued in February 2019 and was sighted by the Auditors	Site is compliant with this condition.	Compliant
E1.2	The financial assurance must be in favour of the Environment Protection Authority in the amount of two hundred thousand dollars (\$200,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA to any other person. The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by APRA.	Bank Guarantee for financial assurance in favour of the Environment Protection Authority in the amount of two hundred thousand dollars (\$200,000 was issued in February 2019 and was sighted by the Auditors.	Site is compliant with this condition.	Compliant
E1.3	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure	Bank Guarantee for financial assurance in favour of the Environment Protection Authority in the amount of two hundred thousand dollars (\$200,000 was issued in February 2019 and was sighted by the Auditors.	Site is compliant with this condition.	Compliant
E1.4	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	None	None	Not Triggered

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E1.5	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	None	None	Not Triggered
E1.6	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	None	None	Not Triggered
E2	Environment Obligations of Licensee (Works and Programs)			
E2.1	<p>While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:</p> <ul style="list-style-type: none"> (a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents. (b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. (c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA. 	<p>Section 4.10 of the OEMP addresses the requirement for immediate clean-up of spills, leaks or other discharges.</p> <p>Site inspection by the Auditors on 06/04/20 observed spillage of a small amount of putrescible waste on the concrete hardstand outside the Load Out Area of the Waste Transfer Station on the day of the Audit inspection.</p> <p>Whilst daily site inspections are done under Section 6.3 of the Odour Management Plan, spills should also be proactively reported by employees to enable rapid cleanup. This was not done.</p>	<p>The operator must ensure training for employees on general housekeeping, responsibilities, and litter and odour management is current.</p> <p>An improved focus on general housekeeping and odour management in staff training will help to address this matter.</p>	<p>Non-compliant (Condition E2.1(a) only)</p> <p>Compliant (Condition E2.1(b) and (c))</p>

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E2.2	<p>In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee must:</p> <ul style="list-style-type: none"> (a) Make all efforts to contain all fire water on the premises; (b) Make all efforts to control air pollution from the premises; (c) Make all efforts to contain any discharge, spill or run-off from the premises; (d) Make all efforts to prevent flood water entering the premises; (e) Remediate and rehabilitate any exposed areas of soil and/or waste; (f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of; (g) At the request of the EPA, monitor groundwater beneath the premises and its potential to migrate from the premises; (h) At the request of the EPA, monitor surface water leaving the premises; and (i) Ensure the premises is secure 	The Erskine Park Waste Transfer Station – Stage 1 Operational Waste Management Plan (dated 6 August 2018) provides information on incidents management procedures	Site is compliant with this condition.	Compliant
E2.3	<p>After the licensee's premises cease to be used for the purposes to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:</p> <ul style="list-style-type: none"> (a) Remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and (b) Rehabilitate the premises, including conducting an assessment of the site and if required remediation of any site contamination. 	None	None	Not Triggered
E3	Post-commissioning Odour Audit			
E3.1	The licensee must carry out an Odour Audit within six (6) months of commencement of operation of the Waste Transfer Station.	The Odour Audit was commissioned in early March 2019. The Erskine Park Resource Management Facility Waste Transfer Station Odour Audit (Final Report dated July 2019) was sighted by the Auditors	Site is compliant with this condition.	Compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E3.2	A copy of the audit report from the Odour Audit referred to in condition E3.1 must be submitted to the EPA within two (2) months of commissioning the Odour Audit and must include the Licensee's response to recommendations contained in the audit report.	The Erskine Park Resource Management Facility Waste Transfer Station Odour Audit (Final Report dated July 2019) was sighted by the Auditors	The Odour Audit was required to be submitted to the regulators by early May 2019. The Odour Audit Report was lodged to EPA on 21 November 2019. Cleanaway sought an extension from EPA to submit the Odour Audit Report on this date.	Compliant

Appendix F – Site inspection photos

Figure F1.1. Vehicle entry into site via weighbridge (left). Handstand area in front of fast acting rollers and Waste Transfer Station tipping entry (right). Site inspection 06/04/20.



Figure F1.2. Evidence of litter / sediment accumulation in front of Waste Transfer Station (eastern side) (left) and along the batter associated with the south east corner of the site (middle). Some evidence of soil tracking onto hardstand areas along southern exit of site (right). Site inspection 06/04/20.

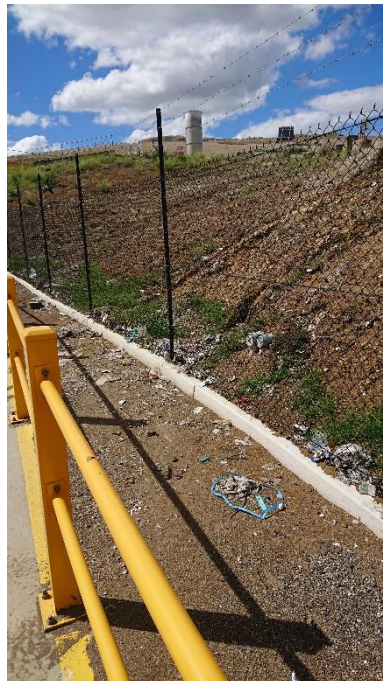


Figure F1.3. All fast-acting roller doors functioning well, no evidence of odour outside building (left). All waste sorting plant and equipment functioning (centre). Dust suppression system in building working well, good dust control achieved (right). Site inspection 06/04/20.

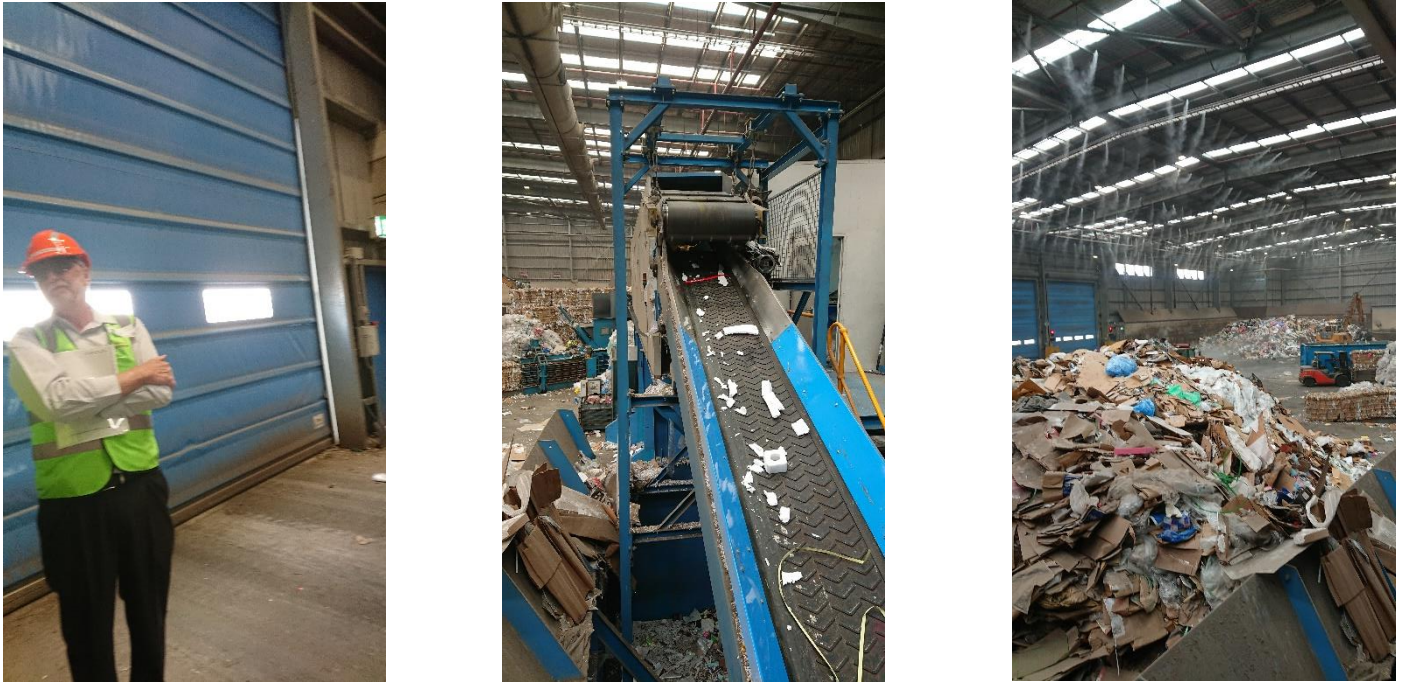


Figure F1.4. Vermin control bait stations observed, no vermin (birds or rodents) observed during site inspection on 06/04/20. Bait station inside Waste Transfer Station (left) and outside the Waste Transfer Station (right).



Figure F1.4. Non-compliant waste materials (gas bottles) stored in a secure cage on eastern side of Waste Transfer Station. Site inspection 06/04/20.



Figure F1.5. Evidence of soil accumulation on hardstand area adjacent to load out entry (left and centre). Spillage of some waste on exit to load out area (right). Site inspection 06/04/20.

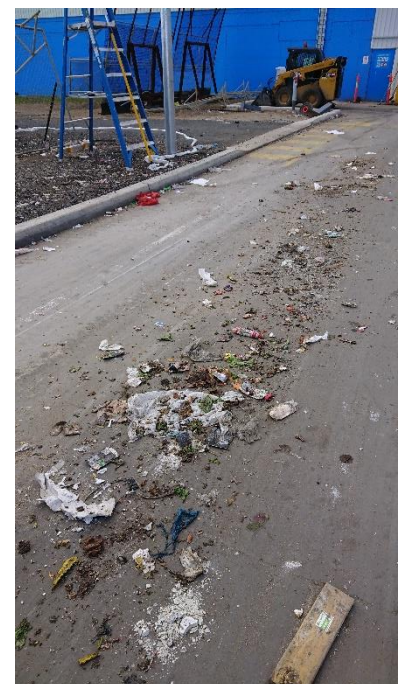
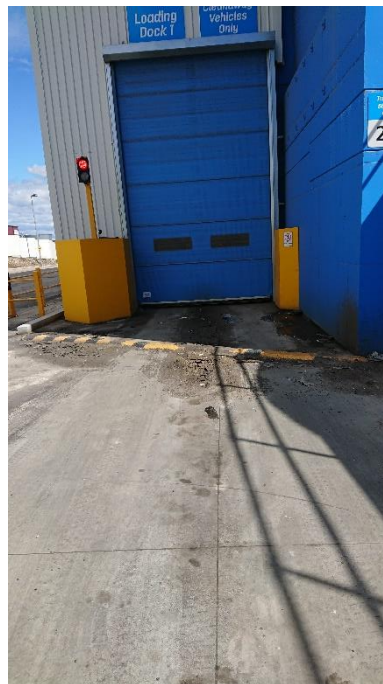


Figure F1.6. Evidence of litter, waste and inadequate maintenance of landscaped areas on north-east side of site (left and right). Site inspection 06/04/20.



Figure F1.7. Soil erosion occurring in landscaped areas along southern and western side of site, with some little accumulation on stormwater pits. Site inspection 06/04/20.

