

Lucas Heights Resource Recovery Park IEA 2021

Independent Environmental Audit



Lucas Heights Resource Recovery Park IEA 2021

Independent Environmental Audit

Client: SUEZ Recycling and Recovery Australia

ABN: 70 002 902 650

Prepared by

AECOM Australia Pty Ltd

Level 21, 420 George Street, Sydney NSW 2000, PO Box Q410, QVB Post Office NSW 1230, Australia

T +61 2 8934 0000 F +61 2 8934 0001 www.aecom.com

ABN 20 093 846 925

04-Jul-2021

Job No.: 60657515

AECOM in Australia and New Zealand is certified to ISO9001, ISO14001 AS/NZS4801 and OHSAS18001.

© AECOM Australia Pty Ltd (AECOM). All rights reserved.

AECOM has prepared this document for the sole use of the Client and for a specific purpose, each as expressly stated in the document. No other party should rely on this document without the prior written consent of AECOM. AECOM undertakes no duty, nor accepts any responsibility, to any third party who may rely upon or use this document. This document has been prepared based on the Client's description of its requirements and AECOM's experience, having regard to assumptions that AECOM can reasonably be expected to make in accordance with sound professional principles. AECOM may also have relied upon information provided by the Client and other third parties to prepare this document, some of which may not have been verified. Subject to the above conditions, this document may be transmitted, reproduced or disseminated only in its entirety.

Quality Information

Document Lucas Heights Resource Recovery Park IEA 2021

Ref 60657515

Date 04-Jul-2021

Prepared by Shani Walton, Principal Environmental Consultant

Reviewed by Helen Onus, Lead Auditor

Revision History



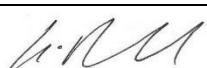
Rev	Revision Date	Details	Authorised	
			Name/Position	Signature
0	17-Jun-2021	Draft Report	Kelly Pearsall – Group Director Environment	
1	28-Jun-2021	Final Draft Report	Kelly Pearsall – Group Director Environment	
2	4-Jul-2021	Final Report	Kelly Pearsall – Group Director Environment	

Table of Contents

Executive Summary	i
1.0 Introduction	1
1.1 Background	1
1.2 Audit scope	1
1.3 Audit methodology	3
1.4 Documents reviewed	4
1.5 Personnel and timing	4
1.6 Format of report	4
2.0 Lucas Heights Resource Recovery Park Operations	6
2.1 Site description	6
2.2 Project Approval and licences	8
2.3 Description of site operations	9
2.4 Activities occurring during site inspection	10
3.0 Consultation	12
3.1 Department of Planning, Infrastructure and Environment	12
3.2 Environment Protection Authority	12
3.3 Sutherland Shire Council	13
3.4 Department of Primary Industries, Office of Water	13
4.0 Compliance with Statutory Requirements	14
4.1 Performance categories	14
5.0 Environmental Performance	15
5.1 Regulatory Action	15
5.2 Incident management	15
5.2.1 Leachate discharge incident, 30 September 2020	16
5.3 Complaint management	17
5.4 Odour management	18
5.4.1 Odour complaints	18
5.4.2 Pollution Reduction Program	19
5.4.3 Additional Odour Control Measures	24
5.4.4 Gas extraction coverage	24
6.0 Site Inspection Observations	26
6.1 Site inspection observations	26
7.0 Review of Environmental Management Plans	40
7.1 Operational Environmental Management Plan	40
7.2 Air Quality and Odour Management Plan	42
7.3 Groundwater Management Plan	42
7.4 Construction Environmental Management Plan – Dual Gas and Leachate Trench	43
7.5 Construction Environmental Management Plan – GO Facility	43
8.0 Summary of non-compliances and recommendations	45
8.1 Summary of report recommendations	46
8.2 Summary of non-compliances	48
8.3 Summary of opportunities for improvement	55
9.0 Limitations	56
Appendix A Compliance Checklist	57
Appendix B 2018 IEA Recommendations	58
Appendix C DPIE Audit Team Approval	60
Appendix D Independent Audit Report Declaration Form	61

List of Figures

Figure 2-1	LHRRRP Site Layout (source: LHRRP OEMP, Figure 2.2, dated 13 October 2017)	7
------------	--	---

Figure 2-2	Re-profiling staging (<i>Source: GHD, Proposed Reprofilling Development Plan, 03.07.15, Appendix D the LHRRP OEMP</i>)	10
Figure 5-1	LHRRP – Odour Complaints 2015-2017 (<i>Source: SUEZ</i>)	18

List of Tables

Table 1-1	Scope of Work	2
Table 2-1	Summary of Scheduled and Fee Based Activities permitted under an EPL	8
Table 4-1	Performance category	14
Table 5-1	Summary of incidents recorded in during audit period	16
Table 7-1	OEMP and Appendices Summary	41
Table 8-1	Summary of Recommendations relating to management plans, site observations and previous IEA recommendations	46
Table 8-2	Summary of Conditions assessed as non-compliant or not verified	48
Table 8-3	Recommendations for Conditions considered compliant for improved compliance or continuous improvement	55

List of Appendices

Appendix A	Compliance Checklist
Appendix B	2018 IEA Recommendations
Appendix C	DPIE Audit Team Approval
Appendix D	Independent Audit Report Declaration Form

Abbreviations

Abbreviation	Description
AECOM	AECOM Australia Pty Ltd
ANSTO	Australian Nuclear Science and Technology Organisation
ARRT Facility	Advanced Resource Recovery Facility
CEMP	Construction Environmental Management Plan
CoC	Condition of Consent
Council	Sutherland Shire Council
CRG	Community Reference Group
DPIE	Department of Planning, Industry and Environment
DPI Water	Department of Primary Industries, Office of Water
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environment Protection Authority
EPL	Environment Protection Licence
GO Facility	Garden Organics Facility
IEA	Independent Environmental Audit
IMS	Integrated Management System
ISO	International Standards Organisation
LHCA	Lucas Heights Conservation Area
LHRRP	Lucas Heights Resource Recovery Park
NSW	New South Wales
OEH	Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
OFI	Opportunity for Improvement
PCYC	Police and Community Youth Club
PIRMP	Pollution Incident Response Management Plan
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
SIMS	Incident and complaint management system
SITA	SITA Australia Pty Ltd, now SUEZ Environment Pty Ltd
SOP	Standard Operating Procedure
SSC	Sutherland Shire Council
the 'audit period'	24 January 2018 to 5 May 2021
tpa	tonnes per annum
TPA	Truck Parking Area
VPA	Voluntary Planning Agreement
WAMC	Waste Assets Management Corporation – NSW Government.
WHS	Work, Health and Safety
WSN	Waste Services NSW

Executive Summary

AECOM Australia Pty Ltd (AECOM) was engaged by SUEZ Environmental Pty Ltd (SUEZ) to carry out an Independent Environmental Audit (IEA) of the Lucas Heights Resource Recovery Park (LHRRP) (the 'Site'), located on New Illawarra Road, Lucas Heights in the Sutherland Shire Council (SSC) local government area of New South Wales (NSW).

Approval to operate the LHRRP was received in November 1999 (DA 11-01-99). SUEZ (formerly SITA) acquired the Site from WSN Environmental Solutions in June 2011. DA 11-01-99 included a requirement for an IEA every three years. The most recent IEA under that consent was conducted by URS (now AECOM) in 2015. At that time SUEZ was in the process of seeking approval to increase waste processing volumes at the LHRRP through landfill re-profiling (stripping back covered areas and landfilling on top of existing waste), extend the life of the landfill, relocate and expand the Garden Organics (GO) facility and construct and operate an Advanced Resource Recovery Treatment (ARRT) facility. Project Approval (SSD 6835) for the expansion was granted on 23 January 2017 and included a requirement to modify DA 11-01-99 to remove the conditions of that consent that relate to the LHRRP, with the intention that all activities undertaken at the LHRRP will be covered under Project Approval SSD 6835. A modification (MOD1) of the Consent (SSD 6835) was approved by DPIE on 5 June 2018 to enable SUEZ to increase operating hours at the Site.

Condition D12 Project Approval SSD 6835 requires SUEZ to commission an IEA within one year of the date of the approval, and every three years thereafter. The AECOM audit team was approved by the NSW Department of Planning, Infrastructure and Environment (DPIE) on 4 February 2021 to undertake the IEA.

The audit was completed in accordance with Condition D12 and the AECOM proposal dated 18 January 2021.

The audit methodology comprised the following activities:

- Initial discussions with SUEZ management to organise the audit, including the provision of documentation, the Site visit and timing
- Consultation with key government agencies and other relevant agencies as presented in this Report
- A two day Site inspection and interviews with key site personnel on 4 and 5 May 2021
- Review of additional documentation provided by SUEZ after the Site inspection
- Submission of a Draft Report to SUEZ outlining the audit findings
- Finalisation of the Report based on comments from SUEZ.

This is the second IEA to be carried out under Project Approval SSD 6835 and for the purpose of this audit, the audit period has been defined as from 24 January 2018 (date following site inspection conducted as part of the previous audit) to 5 May 2021 (final day of the site inspection conducted as part of this audit). This report presents the findings of this audit.

The IEA assessed compliance with relevant approvals, licences and management plans applicable to the LHRRP. Detailed compliance registers identifying audit findings, comments and recommendations are presented in Appendix A. Non-compliances identified against relevant approvals are identified and discussed in Section 8.0.

The LHRRP's overall compliance status is summarised in Table ES 1.

Table_ES 1 Overall Compliance Assessment

Relevant Approval	No. of Conditions Compliant	Number of Conditions Non-compliant	Number of Conditions Not Triggered	Number of Conditions Noted/ Complete
Project Approval SSD 6835	54	11	30	3

SUEZ complied with the majority (83%) of the Conditions of its Development Consent. A significant portion of the conditions were not triggered as they related to the new GO Facility and the ARRT Facility which were yet to be constructed at the time of the audit.

The scope of the audit also included a review of the adequacy of the environmental management plans for the site. The findings of the adequacy review of management plans are presented in Section 7.0. Continuous improvement opportunities were identified and are presented throughout the report and summarised in Section 8.0.

1.0 Introduction

1.1 Background

AECOM Australia Pty Ltd (AECOM) was engaged by SUEZ Recycling and Recovery Pty Ltd (SUEZ) to carry out an Independent Environmental Audit (IEA) of the Lucas Heights Resource Recovery Park (LHRRP) (the 'Site'), located on Little Forest Road, Lucas Heights in the Sutherland Shire Council (SCC) local government area of New South Wales (NSW).

Approval to operate the LHRRP was received in November 1999 (DA 11-01-99). SUEZ (formerly SITA) acquired the Site from WSN in June 2011. DA 11-01-99 included a requirement for an IEA every three years. The most recent IEA under that consent was conducted by URS (now AECOM) in 2015. At that time SUEZ was in the process of seeking approval to increase waste processing volumes at the LHRRP through landfill re-profiling (stripping back covered areas and landfilling on top of existing waste), extend the life of the landfill, relocate and expand the Garden Organics (GO) facility and construct and operate an Advanced Resource Recovery Treatment (ARRT) facility. Development Consent (SSD 6835) for the expansion was granted on the 23 January 2017 and included a requirement to modify DA 11-01-99 to remove the conditions of that consent that relate to the LHRRP, with the intention that all activities undertaken at the LHRRP will be covered under Development Consent SSD 6835. A modification (MOD1) of the Consent (SSD 6835) was approved by DPIE on 5 June 2018 to enable SUEZ to increase operating hours at the Site.

Condition D12 Project Approval SSD 6835 requires SUEZ to commission an IEA within one year of the date of the approval, and every three years thereafter. The AECOM audit team was approved by the NSW Department of Planning, Industry and Environment (DPIE) on 4 February 2021 to undertake the IEA. The audit site inspection was undertaken on 4 and 5 May 2021.

This is the second IEA to be carried out under Project Approval SSD 6835 and for the purpose of this audit, the audit period has been defined as from 24 January 2018 (date following site inspection conducted as part of the previous audit) to 5 May 2021 (final day of the site inspection conducted as part of this audit). The recommendations and opportunities for improvement identified in the 2018 IEA have been reviewed as part of this audit to capture operational changes to Site. This report presents the findings of this audit.

1.2 Audit scope

The audit was conducted in accordance with the requirements set out in SSD 6835, Schedule 2, Condition D12, and Section 3.3 of the DPIE *Independent Audit Guideline* (the Audit Guidelines) (DPIE, 2020) as detailed in Table 1-1.

Table 1-1 Scope of Work

Condition	Requirement	Report Reference
SSD 6835, Schedule 2, Condition D12,		
D12	<i>Within one year of the date of this consent, and every three years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the site. The audit must:</i>	
(a)	<i>be carried out by a suitably qualified, experienced and independent audit team whose appointment has been endorsed by the Secretary;</i>	Section 1.5; Appendix C
(b)	<i>assess the environmental performance of the site, and its effects on the surrounding environment;</i>	Section 5.0
(c)	<i>determine whether the site is complying with the relevant standards, performance measures and statutory requirements;</i>	Section 8; Appendix A
(d)	<i>review the adequacy of the Environmental Management Plans for the site, compliance with this consent, and any other licences and consents; and, if necessary; and</i>	Section 7.0 Section 8; Appendix A
(e)	<i>recommend measures or actions to improve the environmental performance of the site, and/or any plan/ program required under this consent.</i>	Section 8
DPIE Audit Guideline		
3.3	<i>An Independent Audit must include:</i>	
1	<i>an assessment of compliance with:</i>	
(a)	<i>all conditions of consent applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation as per Section 3.2;</i>	Section 8; Appendix A
(b)	<i>all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and</i>	Section 7
(c)	<i>all environmental licences and approvals applicable to the development excluding environment protection licences issued under the Protection of the Environment Operations Act 1997.</i>	Appendix A
2	<i>a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:</i>	
(a)	<i>actual impacts compared to predicted impacts documented in the environmental impact assessment;</i>	Appendix A
(b)	<i>the physical extent of the development in comparison with the approved boundary;</i>	Appendix A CoC B2b
(c)	<i>incidents, non-compliances and complaints that occurred or were made during the audit period;</i>	Section 5
(d)	<i>the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and</i>	Section 3
(e)	<i>feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative</i>	Section 3

Condition	Requirement	Report Reference
	<i>Committee, on the environmental performance of the project during the audit period;</i>	
3	<i>the status of implementation of previous Independent Audit findings, recommendations and actions (if any);</i>	Appendix B
4	<i>a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and</i>	Section 7
5	<i>any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.</i>	Section 3.1

1.3 Audit methodology

The purpose of this IEA was to assess environmental performance of the project and assess compliance with the Conditions of Consent (CoC), licences and approvals that apply to the project and review the adequacy of the Environmental Management Plans and/or Environmental Monitoring Programs required under the CoC.

The audit was completed in accordance with Condition D12 of SSD 6835 and the AECOM proposal dated 18 January 2021.

A compliance checklist was developed by AECOM and includes a list of the CoC to be assessed for compliance (SSD 6835).

The auditors assessed compliance by viewing evidence of documents associated with each aspect of the various approvals and associated plans, programs and strategies and observations made during the site inspection.

The audit was carried out in accordance with ISO 19011:2018 Guidelines for auditing management systems.

The audit methodology comprised the following activities:

- Initial discussions with SUEZ management to organise the audit, including the provision of documentation, the Site visit and timing
- Consultation with key government agencies and other relevant agencies as presented in this Report
- A two-day site inspection and interviews with key site personnel, on 4 and 5 May 2021. Tasks undertaken during the audit site inspection included:
 - Opening meeting
 - Site inspection with the New Illawarra Road Landfill Manager and NSW Compliance Manager
 - Review of relevant documentation provided by SUEZ
 - Interviews with key personnel including the LHRRP Landfill Manager and NSW Compliance Manager
 - Close out meeting.
- Review of additional documentation provided by SUEZ after the Site inspection
- Submission of a Draft Report to SUEZ outlining the audit findings
- Finalisation of the Report based on comments from SUEZ.

This report provides a summary of findings including a discussion of the environmental performance of the Site, details of identified non-compliances with the CoC, review of adequacy of management

plans, and recommended actions to improve compliance status as well as continual improvement opportunities.

1.4 Documents reviewed

The following information was reviewed during the audit process:

- Regulatory approval
- Annual Returns
- Management Plans as listed in Section 7.0
- Selected Standard Operating Procedures (SOPs) and checklists
- Selected correspondence with relevant government agencies and stakeholders (as provided and as relevant to the audit)
- Selected records of competency, induction and training
- Selected meeting minutes
- 2018 IEA (recommendations and opportunities for improvement) for SSD 6835.
- Selected reports
- Evidence of monitoring and review.

Documents used as part of the audit are listed against each CoC in **Appendix A**.

1.5 Personnel and timing

In accordance with Schedule 2, Condition D12 of SSD 6835, the audit was to be conducted by a suitably qualified, experienced and independent audit team whose appointment has been endorsed by the Secretary. The audit team comprised the following personnel, as approved by DPIE by letter dated 4 February 2021 (refer Appendix C).

- Helen Onus, Lead Auditor.
- Shani Walton, Auditor.

Helen Onus is registered by Exemplar Global as a Certified Auditor for Environmental Management and Compliance Auditing.

The site visit for the audit was conducted on 4 and 5 May 2021.

Personnel interviewed during the site visit included the following:

- LC Chiang, Landfill Manager, New Illawarra Road Landfill
- Kelly Gee, NSW Compliance Manager
- Adam Philip, Compliance Officer
- Mgahl Eather, Compliance Officer.

1.6 Format of report

The format of this report is as follows:

- Section 1.0 is introductory and defines the scope and nature of the audit.
- Section 2.0 describes the operations at the LHRRP as observed during the site inspection.
- Section 3.0 describes the consultation undertaken with relevant stakeholders.
- Section 4.0 describes the approach to the assessment against the relevant standard, performance measures and statutory requirements.

- Section 5.0 provides an assessment of the environmental performance of the development and its effects on the surrounding environment.
- Section 6.0 provides a summary of site observations made during the site visit.
- Section 7.0 presents the findings of the review of the adequacy of the Environmental Management Plans for the Site.
- Section 8.0 summarises the non-compliances and recommendations made throughout the report.

Appendix A is a tabulated review of the results of the assessment against the CoC.

Appendix B provides an assessment of the status of implementation of the recommendations made in the 2018 IEA.

Appendix C is a copy of the DPIE approval of the audit team.

2.0 Lucas Heights Resource Recovery Park Operations

2.1 Site description

The LHRRP is located on New Illawarra Road, Lucas Heights in the SSC local government area approximately 30 kilometres (km) south-west of the Sydney Central Business District.

The LHRRP occupies an area of approximately 205 hectares (ha) of which SUEZ owns 89.5 ha. The remaining land (115.5 ha) falls within the Australian Nuclear Science and Technology Organisation (ANSTO) 1.6 km radius exclusion zone. Land owned by ANSTO is leased to SUEZ under the ANSTO Agreement. The ANSTO bushland areas border the site. The Police and Community Youth Club (PCYC) operates a minibike club on approximately 11 ha of rehabilitated landfill area near the south-eastern corner of the LHRRP area. The nearest residents are located at North Engadine and a new development west of Barden Ridge, both approximately two kilometres to the east.

LHRRP is situated directly adjacent to the Lucas Heights Conservation Area (LHCA). Mill Creek, a tributary of the Georges River, originates from the western perimeter of the LHRRP and flows in a northerly direction through the LHCA towards the Georges River. To the north east of the site, LH1 (closed since 1985) has been redeveloped into a sporting/recreation area.

The Sydney International Clay Target Association lease an area from SUEZ on the western boundary of the LHRRP for clay target shooting.

Under Development Consent SSD 6835, dated 23 January 2017, SUEZ is responsible for:

- Landfill (also known as LH2) including the resource recovery centre at the public drop off area
- The existing GO Facility
- The future GO Facility and ARRT Facility.

The scope of this audit is limited to the landfill and the existing GO Facility which are operational. Construction and operation of the new GO Facility and ARRT Facility had not commenced during the audit period.

The following areas were not assessed in detail as part of this audit:

- LH1, now active sporting and recreation areas (SSC responsibility)
- LHCA (ownership transferred to SSC in 2002)
- Electricity generation from landfill gas (Managed by EDL under a separate EPL)
- Area leased to the Sydney International Clay Target Association
- The PCYC minibike club (PCYC).

Figure 2-1 provides a site layout.

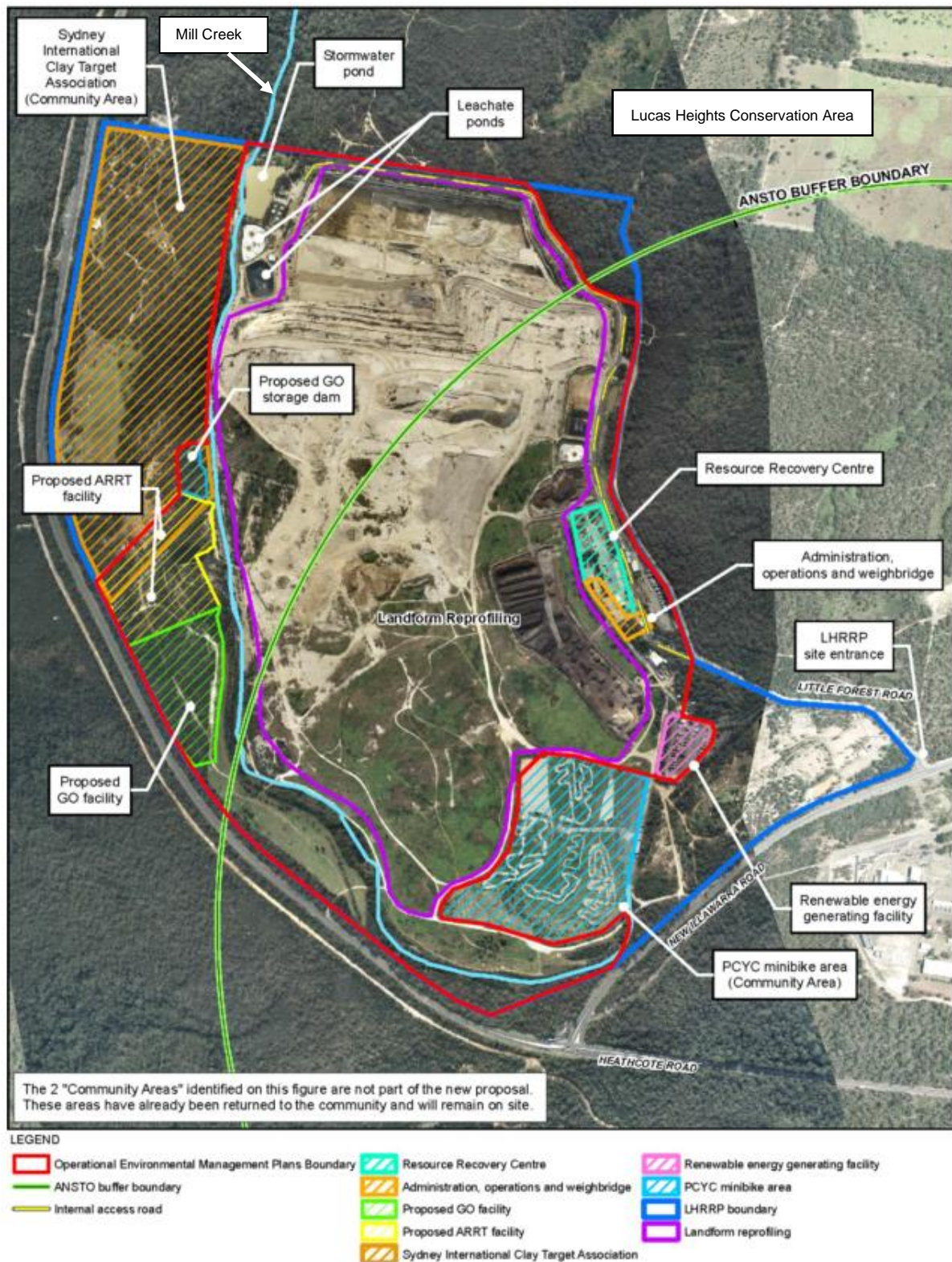


Figure 2-1 LHRRP Site Layout (source: LHRRP OEMP, Figure 2.2, dated 13 October 2017)

2.2 Project Approval and licences

Development consent for landfilling activities on the LHRRP was originally granted by SSC in June 1985. Consent for the expansion of landfilling was granted by the Minister for Urban Affairs and Planning in November 1999 and governed by DA 11-01-99.

On 23 January 2017 the DPIE granted Consent (SSD 6835) to increase landfill capacity, relocate and expand the GO Facility and construct and operate a new resource recovery facility (the 'ARRT Facility').

A modification (MOD1) of the Consent (SSD 6835) was approved by DPIE on 5 June 2018 to enable SUEZ to extend operating hours at the Site.

This audit is the second IEA to be carried out under Project Approval SSD 6835. A summary of the recommendations and opportunities for improvement included in the 2018 IEA and a brief review of the actions taken to address these is included in Appendix B.

LHRRP operates under two EPLs, which specify minimum environmental obligations to be complied with. A summary of the scheduled activities associated with these EPLs is provided in Table 2-1.

Table 2-1 Summary of Scheduled and Fee Based Activities permitted under an EPL

EPL #	Premises	Scheduled Activity	Fee Based Activity
5065	Lucas Heights Resource Recovery Park	Waste processing (non-thermal treatment)	Non-thermal treatment of liquid waste: any annual processing capacity
		Waste disposal (application to land)	Waste disposal by application to land: any capacity
		Waste storage	Waste storage – other types of waste: any other types of waste stored
		Waste storage	Waste storage – waste tyres: > tonne stored
12520	Lucas Heights Waste and Recycling Centre (existing GO Facility)	Composting	Composting: >5,000-50,000 T annual capacity to receive organics
		Waste processing (non-thermal treatment)	Non-thermal treatment of general waste: any annual processing capacity

EPL 5065 was updated on three occasions during the audit period:

- 27 November 2018 – varied to:
 - incorporate the requirement to conduct a Pollution Study
 - reflect the updated Landfill Gas Monitoring Program requirements
 - remove conditions related to landfill gas infrastructure works that had been completed
 - extend operational hours
 - update the description of monitoring point locations and enable sampling of adjacent or representative monitoring wells for quarterly monitoring where wells are not able to be sampled
 - allow a trial of an alternative daily cover material to be conducted
- 25 March 2019 – varied to allow the covering of asbestos waste with general solid waste and Virgin Excavated Natural Material (VENM) and to update the definition of VENM
- 10 September 2019 – varied to:

- allow the use of Mixed Waste Organic Outputs as Alternative Daily Cover as a trial
- require implementation of a Pollution Reduction Program (PRP)
- provide clarity as to the requirements surrounding the tip face.

The EPL associated with the existing GO Facility (EPL 12520) was not varied during the audit period.

The EPL associated with the PCYC minibike club area (EPL 13114) was surrendered by SUEZ on 30 July 2019.

SUEZ also entered into a Voluntary Planning Agreement (VPA), dated 17 March 2017, with SSC in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Under the VPA, SUEZ has committed to meeting a number of requirements related to the Site's environmental performance. The OEMP, discussed in Section 7.1, includes some of the requirements of the VPA. Requirements of the VPA were not reviewed as part of this audit.

2.3 Description of site operations

SUEZ manages the LHRRP as a solid waste landfill with associated waste management and recycling activities. LHRRP currently provides a range of waste management and resource recovery services to the domestic, municipal and commercial sectors that include:

- Resource Recovery Centre
- Garden organics processing
- Small vehicles drop-off area
- Electricity production
- Engineered landfill
- Native seedling nursery
- Major land rehabilitation.

At the time of the site inspection, landfill operations were operated by Select Civil under contract to SUEZ who oversees the operations of Select Civil.

Landfilling activities on the Site have been undertaken progressively during the audit period. The Site is currently in Phase 4 of the staging plan provided in Figure 6.6 of the EIS (GHD, 2015). Areas D and E are complete, with temporary capping installed; Area B has been filled and covered with intermediate cover and Area A is now active landfill (see Figure 2-2).

SUEZ reported that the sequencing of re-profiling stages had been revised for operational reasons relating to managing gas, leachate and surface water, so that Phase 5 would involve filling Area G (not Area C as shown on the staging plan).

Construction of the GO Facility and ARRT Facility had not commenced during the audit period.

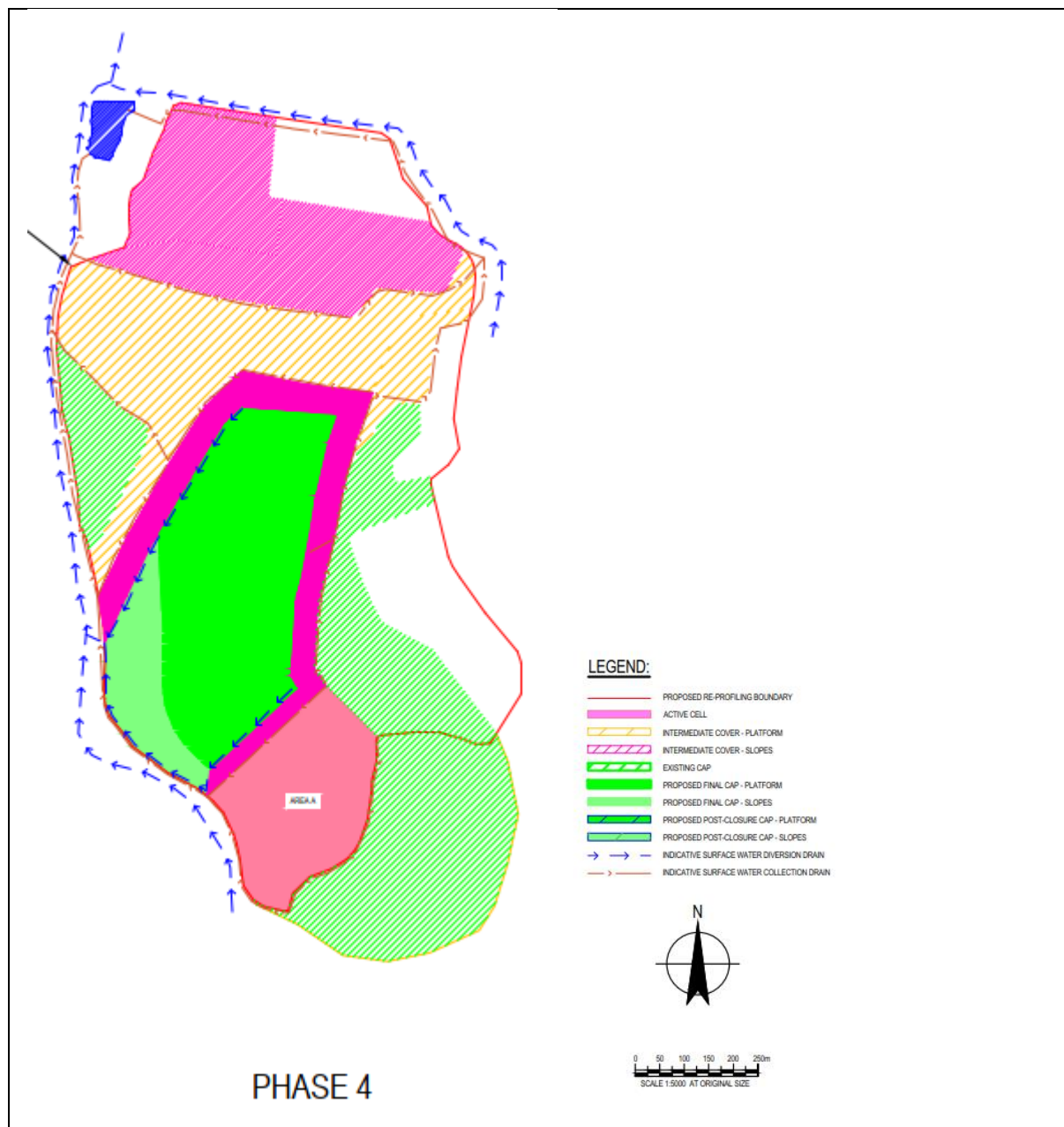


Figure 2-2 Re-profiling staging (Source: GHD, Proposed Reprofiling Development Plan, 3 July 2015, Appendix D LHRRP OEMP)

2.4 Activities occurring during site inspection

Operations undertaken and infrastructure present at the time of the site inspection at LHRRP included:

- Receipt of waste at the weighbridge
- A recycling and waste collection area, for waste collected from small vehicles
- Hazardous waste collection point (waste oils and batteries for off-site treatment)
- A surface water diversion system directing clean water to Mill Creek

- Sedimentation treatment in the main sediment dam (also referred to as Sediment Dam 5) located in the north-west corner of LHRRP. The main sediment dam also operates as a water reuse basin with its water reuse volume provided below the zone actively managed for erosion and sediment control
- Pre-treatment basin upstream of the main sediment dam to help capture coarser sediment before entry to the Main Sediment Dam and to reduce the maintenance requirements of the main sediment dam. The pre-treatment basin receives water via a dirty water drain and discharges water to the main sediment dam
- Stormwater treatment plant (STP) located in the north-west corner of LHRRP (pH adjustment and flocculation). The STP provides water treatment for water retained in the main sediment dam
- Storage of leachate in the main leachate storage dam, a permanent 9 ML dam constructed in 2006, located in the north-west corner of LHRRP
- 10.2 ML emergency leachate storage dam located adjacent to the main leachate storage dam, constructed in mid-2014
- Pumping of leachate-contaminated groundwater into three concrete tanks
- Leachate from the leachate dams and storage tanks is directed (via pipeline) to the leachate treatment plant at LH1 prior to discharge with consent to Sydney Water Corporation's sewerage system under a Trade Wastewater Agreement. An additional reactor was installed at LH1 in 2019 increasing the leachate treatment capacity of the plant.
- Staged landfilling of municipal solid waste. At the time of the site visit, landfilling was continuing in Area A and Area B was 80% filled
- Filling and compaction of landfilled waste
- Maintenance of vehicles and equipment in a workshop operated by Select Civil
- Storage of stormwater from the Select Civil workshop in a lined pond
- Continued use of the Truck Parking Area (TPA), including basic maintenance of vehicles in the TPA workshop. The TPA had been paved in concrete during the audit period.
- Installation of covering to the 60,000 L diesel tank in the TPA
- Receipt of masonry, steel and other materials for reuse or recycling
- Environmental management, monitoring and reporting including monitoring around the landfill including monitoring of air emissions (dust), surface water, odour, trade waste, groundwater, noise, surface gas, subsurface gas and leachate
- Litter patrols around the boundary and general area of LHRRP
- Treatment of surface water run-off (leachate) from the existing GO Facility in an aerated leachate pond with a capacity of 10 ML
- Removal of excess leachate from the existing GO facility dam via trucking to the SUEZ Spring Farm Resource Recovery Facility
- Separation of accepted green waste into Type A Material which includes pallets, untreated wood waste, timber offcuts and selected tree waste that does not contain weed species (~20%) and Type B Material which includes garden waste and trees which may include noxious or garden weeds (~80%)
- Production of products for mulch and compost at the existing GO Facility.

3.0 Consultation

Whilst consultation was not specifically required by Condition D12 relating to the scope of the IEA, Section 3.2 of the DPIE Independent Audit Post Approval Requirements, requires that prior to the site inspection the auditor must consult with DPIE who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit. As part of the audit process, AECOM contacted key government agencies to seek their views on the environmental performance of the Site. It is noted the chairperson of the Community Reference Group (CRG) was not contacted as this role was held by a SUEZ employee during the audit period. A summary of the consultation process and any feedback obtained is provided in the following sections.

3.1 Department of Planning, Infrastructure and Environment

Feedback was sought on 16 April 2021 from the DPIE officer responsible for the Site. The officer provided a response to AECOM on 23 April 2021 requesting that the IEA focus on the compliance status of the following:

- Condition B6, Schedule B of SSD 6835 (as modified)
- Condition C8 and C9, Schedule C of SSD 6835 (as modified)
- Condition D14, Schedule D of SSD 6835 (as modified)
- Conditions D10 and D11, Schedule D of SSD 6835 (as modified). Please review all incidents that have occurred during the reporting period and report on the following:
 - details of incidents (nature of incident, date / duration of incident etc)
 - agencies notified of incidents (list all agencies that were notified of the incident, including date that the incident was reported. In instances where the Secretary was not notified in accordance with the Conditions, it is requested that this detail is clearly noted)
 - agency actions resulting from notified incidents
- Recommendations for and / or improvements to the Incident Reporting systems currently, in relation to Conditions D10 and D11.

Compliance with the CoC is assessed in detail in Appendix A. Particular focus was placed on Conditions B6 (waste receipt limits), C8 (odour), C9 (dust), D14 (CRG), D10 and D11 (incident notification and reporting).

Incident management is also discussed in Section 5.1.

Odour management is also discussed in Section 5.4.

3.2 Environment Protection Authority

Feedback was sought on 11 January 2018 from the Environment Protection Authority (EPA) officer responsible for the Site. The officer provided a response to AECOM on 23 April 2021 noting the following:

- During the audit period, the EPA has had the following involvement with LHRP:
 - Annual Return Notifications in 2018, 2019 and 2020
 - Environmental Management Assessments in 2018, 2019 and 2020
 - Fifteen inspection reports, the last inspection was conducted on 29 July 2020
 - Issued two formal warnings
 - Issued two show cause letters
 - Processed three licence variations
 - Issued risk based licensing notification letters in 2018, 2019 and 2020.

- During the audit period LHRRP was issued with two show cause letters and two formal warning letters:
 - A show cause letter and formal warning were issued in 2018 for non-compliance with licence conditions
 - A show cause letter and formal warning were issued in 2018 for non-compliance with annual return requirements
 - There are currently no outstanding issues.
- The EPA has received approximately 30 community complaints during 2018-2019, all in relation to odour issues. In response to EPA inspections and inquiries regarding odour management in 2018 SUEZ installed additional gas extraction wells to improve gas capture and reduce odours. The EPA received 1 odour complaint from the public in 2020.
- Other than odour complaints about the site, to the knowledge of the EPA, LHRRP is operating within the conditions specified in its environmental protection licence no. 5065.
- The EPA would like the IEA to focus on gas extraction coverage across landfill. This is discussed in Section 5.4.4.

3.3 Sutherland Shire Council

Feedback was sought on 23 April 2021 from the SSC officer responsible for the Site. A response was not provided by the SSC officer.

3.4 Department of Primary Industries, Office of Water

Feedback was sought on 23 April 2021 from the Department of Primary Industries – Office of Water (DPI Water) officer responsible for the Site. A response was not provided by DPI Water.

4.0 Compliance with Statutory Requirements

4.1 Performance categories

The status of the LHRRP performance during the audit, in respect of each condition of the Consent is presented in **Appendix A**. Conditions considered to be not complied with have been listed in Section 8.0 of this report.

Table 4-1 provides a summary of the performance categories in respect to the compliance status for each requirement or commitment as defined in the Audit Guidelines, October 2020, Section 3.8.

Table 4-1 Performance category

Performance Category	Definition
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant
Complete	The requirement relates to a historical requirement that has been assessed in previous IEAs and there are no ongoing or future requirements
Noted	A statement or fact, where no assessment of compliance is required
Not assessed	A condition has not been assessed as part of the scope of this audit

Comments are provided beside each condition to explain aspects of the audit review. Where considered relevant, observations have been made regarding specific compliance issues.

Conditions considered non-compliant are presented in Sections 8.1 and 8.2. The table includes a discussion of the compliance status and recommendations for improvement where appropriate.

Where conditions are considered compliant, however it is considered there is an opportunity to improve the compliance status of the condition, a recommendation has been made in the compliance table. A summary of these Opportunities for Improvement (OFI) is provided in Section 8.3.

5.0 Environmental Performance

5.1 Regulatory Action

The EPA wrote to SUEZ on two occasions during the audit period:

- Advisory Letter – Review of Annual Return for 21 August 2016 to 20 August 2017, dated 1 March 2018, regarding non-compliance with EPL conditions. This matter has not been considered further in this report as the non-compliances related to the period outside of the audit period.
- Invitation to Show Cause – Breach of Licence Conditions 11 September 2018 and 2 November 2018, dated 10 December 2018, concerning:
 - Condition O5.11 in relation to the exposure of previously land filled waste on 11 September 2018
 - Condition O5.12 in relation to the size of the active tip face on 2 November 2018.

SUEZ responded to the EPA on 20 December 2018, outlining that Site activities had been conducted in line with odour modelling as referenced in the licence conditions and recommending that EPL conditions be updated to clarify limits for stripping back.

On 3 May 2019 the EPA wrote to LHRRP regarding its findings. As part of these findings, the EPA found that the licence required amendment to provide clarity as to the requirements surrounding the tip face. These amendments included:

- Condition E8.1 Special Dictionary was updated to define the terms:
 - *Prepared Surface* - a maximum area of 1 hectare of existing intermediate cover or 2 hectares of existing final capped cover that is stripped of cover in advance of landfilling
 - *Stripped Back Area* - the area of the Prepared Surface that is stripped back to expose previously landfilled waste
 - *Active Tip Face* - the area being actively landfilled.
- Condition O5.12 was updated to refer to retaining capping of at least 300mm in depth instead of having a minimum depth of 300mm
- Condition O5.13 was updated to refer to the *Stripped Back Area* instead of the *Active Tip face*
- New condition O5.14 was added which restricts the Active Tip face to no more than 2,500m² at any one time
- New condition O5.15 was added which permits the exposure of landfilled waste to achieve final landfill level contours within the Stripped Back Area
- New condition O5.16 was added which restricts the maximum amount of landfilled waste at any one time, unless approved by the EPA in writing or for emergency conditions.

The EPL 5065 was updated on 10 September 2019 to include these amended conditions.

5.2 Incident management

SUEZ utilises SIMS as its information database for electronic recording, management and statistical reporting of incidents and complaints.

SUEZ has an Incident Reporting and Corrective Action Procedure (PROC008) which outlines how incidents (including environmental) and complaints should be managed. The procedure states that an Initial Incident Report must be raised in SIMS within 60 minutes and a Corrective Action Report (CAR) within 5 days. Incidents are prioritised according to a severity level as defined in the Incident Reporting and Corrective Action SOP. Severity levels are categorised as Minor, Moderate, Major and Severe. For environmental incidents these are considered:

- Minor: small containable on/off site environmental release. Easily cleaned up.
- Moderate: containable on/off site environmental release where there is no potential licence breach. Moderate level of clean up required.
- Major: containable on/off site release where there is a potential licence breach and is notifiable to the regulator. Major clean up required. Short term damage to the environment.
- Severe: uncontained on/off site environmental release which involves significant clean up and causes serious actual or potential environmental harm or a licence breach that is notifiable to the regulator.

SUEZ demonstrated the SIMS system during the audit inspection and provided a list of eight environmental incidents that occurred during 2019-2021. SUEZ informed the auditors that SIMS data prior to 2019 had been archived and was not available during the audit. The incidents have been summarised in Table 5-1.

Table 5-1 Summary of incidents recorded during 2019-2020

Nature of Incident	Severity Level	Incident Date
Fire in Council Truck on Little Forest Road	Minor	7/02/2019
Exceed surface gas methane limit in small area	Minor	30/10/2019
Surface Gas exceedance	Minor	17/12/2019
Small fire in load	Minor	27/04/2020
Small paint spill at Resource Recovery Centre	Minor	30/04/2020
Low Level Radiation detected in waste load	Minor	18/09/2020
Leachate discharge	Moderate	30/09/2020
Fuel leak from garbage truck at landfill	Minor	19/11/2020

Of the above incidents, one incident of potential environmental harm occurred at the Landfill. This related to an unlicensed discharge of leachate to Mill Creek on 30 September 2020 and is discussed further below.

5.2.1 Leachate discharge incident, 30 September 2020

On 30 September 2020 leachate was found to be overflowing from a leachate riser into the stormwater system and subsequently entered a nearby creek. SUEZ reported that the EPA was notified immediately via the Environment Line and followed up with a written report on 8 October 2020. DPIE was notified of the incident by email and written report on 8 October 2020.

The incident investigation indicated the incident was caused by a blocked drainage pipe within one of the leachate risers. This caused leachate to overflow from the riser into the stormwater system. It was reported that the leachate riser had been overgrown with shrubs that have since been cleared to enable regular inspections of the riser. SUEZ estimated that approximately 10 m³ of leachate entered the surface water drains. SUEZ reported that it installed a temporary pump to pump the leachate contaminated water from the creek to the groundwater storage tanks prior to discharge and treatment via the LH1 leachate treatment plant.

The written report to the EPA and DPIE stated that the following, remedial actions were implemented:

- Installation of a surface water bund to divert all surface water around the leachate riser to the surface water holding dam within the site.
- Construction of vehicular access to the leachate riser.

The letter also stated that SUEZ intended on replacing and upgrading the ring main of the riser which caused the incident. This was progressively undertaken with the construction of the new dual gas and leachate trench. At the time of the audit site inspection the trench had been installed in Areas B, D and A.

Surface water samples were collected from the following locations on 1 October 2020 and sent to Eurofins laboratory for testing:

- EPA Point 21 – Discharge Point from stormwater treatment plant
- EPA Point 1 – Discharge point at Mill Creek
- EPA Point 23 – Main Sediment Dam (collected on 30 September 2020)
- MC3- Mill Creek downstream of EPA Point 1.

The results of the monitoring indicated the concentration limits of the EPL had been achieved. Ammonia levels of 1.6 mg/L were recorded at Point 1 which is below the EPL limit of 2.5 mg/L. It is noted that the samples were taken the day after the incident. The water quality monitoring results were provided to the EPA by email dated 19 October 2020.

SUEZ advised that no response was provided from the EPA following submission of the water quality monitoring results.

The auditors consider that the incident should have been categorised as “major” rather than “moderate” as the discharge was not in accordance with the EPL and the incident was notifiable to the regulator. The auditors were unable to verify whether the incident caused pollution of waters.

2021 IEA REC 01:

Review incident categorisation and ensure incidents are appropriately categorised to reflect their severity.

5.3 Complaint management

SUEZ has an Environment Report Hotline (1800 368 737) to receive feedback on environmental matters across all of its NSW facilities. The service is available 24 hours, 7 days a week and the number is advertised on SUEZ's website. In addition, SUEZ also operates a Customer Service Centre (1300 651 116) for the LHRRP which is operated between 9 am to 5 pm Monday to Friday. This number is also advertised on the SUEZ website and at the entrance to the LHRRP.

As described above, the Incident Reporting and Corrective Action Procedure (PROC008) also applies to the management of complaints. The procedure states that an Initial Incident Report and a CAR (using the Complaint CAR in SIMS) must be raised for complaints from the public, customers and councils. Incidents and complaints are prioritised according to a severity level as defined in the Incident Reporting and Corrective Action SOP. Severity levels are categorised as Minor, Moderate, Major and Severe. The procedure defines a complaint as “*Any communication of an unacceptable service level, environmental or OH&S risk or incident*”.

The SIMS database was demonstrated during the audit inspection and an extract of the Complaint CAR report for the period 2019 – 2021 provided. This report provides the list of CARs raised, filtered for the Lucas Heights site and includes a brief incident (in this case, complaint) description. Further details are accessed via the actual CAR report which is included as a link. The auditors reviewed a number of the individual CAR reports to assess the general complaint management process. SUEZ informed the auditors that SIMS data prior to 2019 had been archived and was not available during the audit.

A total of 96 complaints related to odour were received during the audit period (2018 to 2021). Odour complaints are discussed further in Section 5.4.1 and Appendix A.

Two (2) complaints related to tracking of mud were received during the period 2019 to 2021.

One complaint was received from the EPA on 19 March 2020 regarding tracking of mud onto the road that morning. The complaint was entered into the CAR database and an investigation into the complaint identified that the street sweeper had cleaned the road by midday. A letter was sent to the EPA on 31 March 2020 and the complaint was closed out on the CAR system on 2 April 2020.

A second complaint was received from the EPA, and also via the customer hotline relating to tracking of mud on the road on the morning of on 3 November 2020. The complaint was entered into the CAR

database and was investigated immediately, with no mud being found on the road. SUEZ informed the EPA by email on 3 November 2020 that discolouration of the road may have been mistakenly viewed as mud on the road. The complaint was closed out on the CAR system on 23 November 2020.

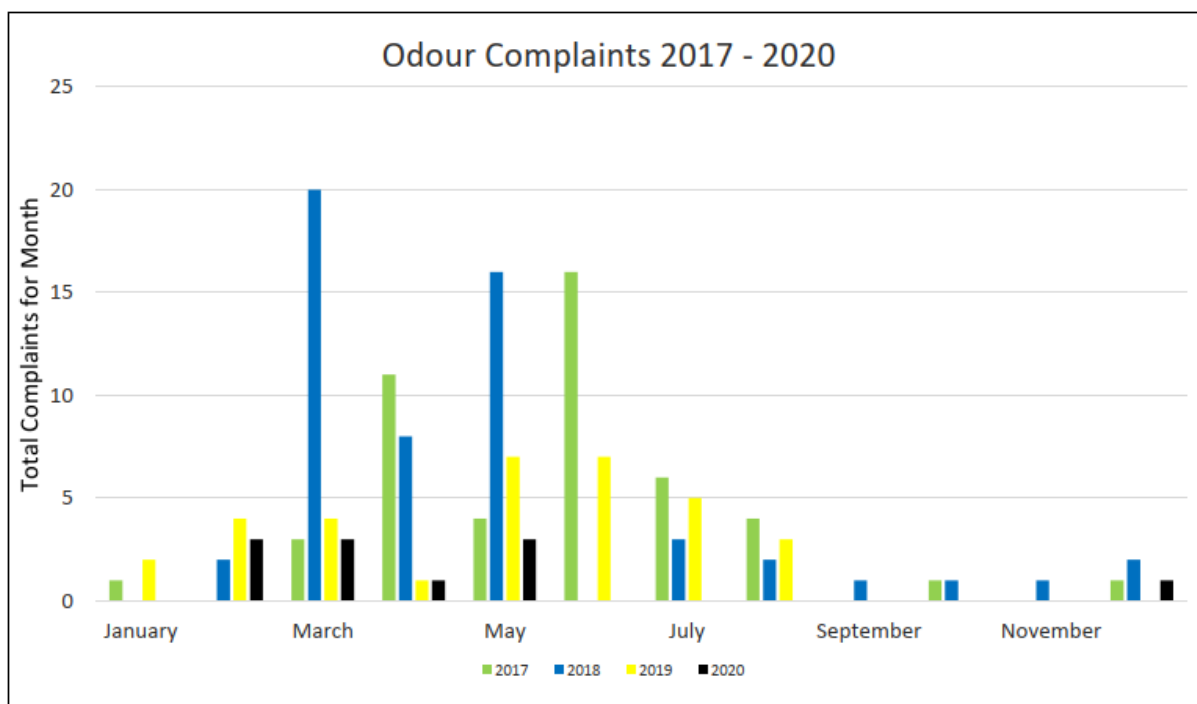
5.4 Odour management

Odour management forms a key aspect of the operation of the Site due to sensitivity of nearby residential receivers.

5.4.1 Odour complaints

Figure 5-1 shows the odour complaints received at LHRRP from 2017 to 2020. As can be seen, the majority of odour complaints were received in the period between April 2017 to May 2018. In general, odour complaints have trended downwards since May 2019 reflecting improvements in landfill gas and odour management.

Figure 5-1 LHRRP – Odour Complaints 2017-2020 (Source: SUEZ)



A total of 96 complaints were received relating to odour during the audit period:

2018 – 54 odour complaints

2019 – 25 odour complaints

2020 – 11 odour complaints

2021 to the date of the audit – 6 odour complaints

The OEMP trigger for an internal technical audit (15 or more complaints received within any calendar month) was triggered on two occasions during the audit period: March 2018 and May 2018.

The internal technical audit conducted following the March 2018 trigger event concluded that practices outlined in the OEMP had been maintained and that possible odour sources included the tip face area where the odour suppression system being trialled had a failure, which had been repaired. Also balancing of the additional gas wells at the time may also have contributed to the odour, this work had been completed.

The auditors note that only one internal technical audit was conducted as the May 2018 event coincided with implementation of the technical audit conducted following the March 2018 event. SUEZ provided evidence that this had been discussed and agreed with SSC.

5.4.2 Pollution Reduction Program

In response to heightened environmental risks relating to offensive odours from the Premises identified by the EPA and the community, the EPA required SUEZ to complete a study relating to reducing the risk of offensive odours. The Odour Risk Reduction Study was completed to the EPA's satisfaction on 15 April 2019 with the submission of the Odour Risk Reduction Report by Northstar Air Quality. The Odour Risk Reduction Report contained a number of recommendations in relation to reducing odours on the premises. EPL 5065 was varied on the 10 September 2019 to require implementation of a Pollution Reduction Program (PRP) in relation to odours. The PRP required the submission of a report by an independent environmental expert by the 16 April 2020 which includes an evaluation of the actions implemented under the PRP. SUEZ commissioned Northstar Air Quality to conduct this review. A summary of the requirements of the PRP and the assessment of implementation by Northstar Air Quality in its report *Review of Pollution Reduction Program EPL 5065 U1* dated 4 June 2020 is provided in Table 5-2. Table 5-2 also includes observations from the audit site inspection.

Table 5-2 Odour Risk Reduction PRP and status of implementation

PRP Condition	Summary of Requirement and Timing	Implementation as per PRP Review Report June 2020	Update from audit site inspection as at May 2021
U1.2	Trial of at least two odour neutralisers or suppressants applied prior to daily cover, with the aim of reducing the risk of offensive odours released during daily cover removal. By 30 October 2019.	An odour neutraliser / suppressant trial was performed over the period 16, 17 and 18 October 2019. On the basis of the trial, the odour suppressant had been changed to Integra™, which is being trialled on a longer-term basis.	SUEZ continue to use Integra™ as the preferred odour suppressant at the recommended dose rates.
U1.3	Consultation with EDL in relation to reducing the frequency and/or duration of the gas extraction system operating at a reduced vacuum, and what potential measures (including infrastructure or procedural measures) could be put in place to achieve this. By 30 September 2019.	A letter confirming consultation between EDL and SUEZ was provided as Appendix B of the PRP Review Report. The letter confirmed that the following actions had been implemented by EDL to reduce the frequency of operating the gas extraction system at reduced vacuum: <ul style="list-style-type: none"> • 24/7 remote vacuum monitoring • 24/7 Power Station monitoring • 24/7 air compressor monitoring • Weekday visual inspections. 	SUEZ advised that the following have been implemented across the Site: <ul style="list-style-type: none"> • EDL had installed remote pressure sensors at 10 locations across the gas collection system to measure and monitor the vacuum. • The EDL power station is equipped with a SCADA system that allows for remote monitoring by EDL's Global Control Centre. • The air compressors were reported to have pressure sensors to monitor the gas collection system. A new air compressor had been installed with remote dial in and diagnostic capabilities. The EDL Monthly Reports provided to SUEZ include a report on the average vacuum on the landfill (measured as static pressure in kPa)
U1.4	Revision of the Landfill Gas Monitoring Plan in relation to the recommendations of the Odour Risk Reduction Report. By 2 March 2020.	An updated Landfill Gas Monitoring Plan (GHD, March 2020) had been prepared and provided to the EPA for comment. An email confirming receipt from the EPA had been provided.	SUEZ reported that no further feedback has been received on the Plan from the EPA.

PRP Condition	Summary of Requirement and Timing	Implementation as per PRP Review Report June 2020	Update from audit site inspection as at May 2021
U1.5	Weather station upgrade to incorporate additional temperature gauges enable potential temperature inversions to be monitored. By 30 November 2019.	Temperature gauges had been purchased and installed on the weather station as required to comply with this condition.	SUEZ was monitoring temperature at 2m and 10 m to determine the presence of temperature inversions. SUEZ reported that it refers to the temperature inversion data when investigating complaints.
U1.6	Review of the operation of the odour fence including the ingredients used, general placement in proximity to the tip face, and measures to ensure that unintended gaps and faults in operation do not occur and implement any recommendations. By 30 November 2019.	<p>Select Civil, the contractor used by SUEZ to operate the “odour fence” had reviewed its operations and provided a summary of changes implemented:</p> <ul style="list-style-type: none"> • Changed from operating the units during landfill operating hours only to running 24 hours/day 7 days/week • Purchased an additional allotment of delivery pipe that can be pre-installed prior to relocating an odour unit to minimise downtime • The manufacturer adjusted the system to improve efficiency of each unit. This was to optimise the use of the chemical • Re-positioned both units to the eastern side of the landfill to create a more effective barrier between the landfill and its nearest neighbours • Changed from using PVC pipe that was glued together, to using HDPE pipe that's poly welded. This reduces incidents of the pipes becoming disconnected due to changes in temperatures <p>Significantly, the changes include the placement of the odour fence to the eastern side of the landfill, additives and measures to prevent pipework disconnection.</p>	At the time of the audit site inspection, two odour units and fencing had been installed at the southern and eastern boundaries of Areas A and B.

PRP Condition	Summary of Requirement and Timing	Implementation as per PRP Review Report June 2020	Update from audit site inspection as at May 2021
U1.7	<p>Consultation with Energy Developments (EDL) to review the procedures and mechanisms for the installation of gas extraction wells following capping and whether there is any scope for gas extraction to be implemented in a timely manner, and then develop an action plan in relation to any improvements identified.</p> <p>By 30 October 2019.</p>	<p>A letter confirming consultation between EDL and SUEZ was provided as Appendix B of the PRP Review Report.</p> <p>The letter documents the outcomes of the discussions and identifies the following improvements:</p> <ul style="list-style-type: none"> Wells are installed as soon as the seal bearing layer is complete The number of disconnected wells in different stages of the remaining works is minimised. 	<p>SUEZ reported that it is continuing to work with EDL to install and connect wells in a timely manner.</p>
U1.8	<p>Evaluation of the feasibility of reducing the maximum area of waste exposed at any one time to 4,500m², 4,000m², 3,000m² and 2,000m², to be conducted by an independent and appropriately qualified expert.</p> <p>By 3 February 2020.</p>	<p>The Pollution Reduction Plan Measures prepared by InSitu Advisory in May 2020 made the following recommendations:</p> <ul style="list-style-type: none"> Any stripping back of residual cover to be done incrementally as much as practicable, in proportion to the quantity of new waste being emplaced and timed so that removal of residual cover is done only immediately before placement of new waste along the toe of the active landfilling batter. In some instances however, some stripping work may have to be done the day before. Avoid preparing the Stripped Back Area and Waste Reworking Area at the same time as this will impact the total exposed waste areas. With careful planning, SUEZ can undertake preparation works at less-busy times and weekends to ensure that does not occur at the same time as active landfilling operations. Keep the size of any areas of waste reworking to a practical minimum. 	<p>SUEZ reported that it was awaiting feedback from the EPA on the report prior to implementing changes to its operating practices.</p>

PRP Condition	Summary of Requirement and Timing	Implementation as per PRP Review Report June 2020	Update from audit site inspection as at May 2021
U1.9	Preparation of a report to evaluate the effectiveness of the Pollution Reduction Program in reducing the risk of offensive odours, prepared by an independent environmental expert. By 16 April 2020.	The PRP Review prepared by Northstar Air Quality in June 2020 found that the frequency of odour complaints was significantly reduced and made recommendations for continued implementation of recommendations.	SUEZ reported that it had not received any feedback from the EPA following submission of the PRP Review Report. SUEZ has recently submitted a licence variation to have the PRP removed from the licence as it is now complete.

5.4.3 Additional Odour Control Measures

The following additional measures were also being conducted:

- Waste was reportedly covered at the end of each day
- An odour unit and odour fence were in place around the GO receivals area and leachate dam of the GO Facility
- Portable odour units were being used as required
- Two odour units and fencing were installed at the southern and eastern boundaries of Areas A and B
- The tip face was sprayed with odouriser prior to covering with tarp at the end of each day
- Leachate dams were reportedly aerated as required
- Weather conditions were monitored when potentially odorous works were being undertaken
- An odour patrol was undertaken in the mornings in and around the site to identify potential odour. The auditors sighted the *Odour Patrol Checklist* which records the date, time and location of odour patrol undertaken for the LHRRP. The checklist includes an assessment of the strength of the odour (0-5) and a description of the odour (landfill, organic, leachate, gas). The spreadsheet indicated assessments were being completed daily (Monday to Friday)
- Gas collection and extraction was continuing
- EDL, the operators of the gas infrastructure undertake inspections and identify areas that require additional wells or additional clay cover
- Implementation of controls to minimise the areas of exposed waste, including: incremental stripping of residual cover; avoidance of preparing the stripped back area and waste reworking area at the same time and during less busy landfilling operations; and, keeping the area of waste reworking to a practical minimum.

5.4.4 Gas extraction coverage

The Lucas Heights landfill provides gas to two local power stations, Lucas Heights 1 and 2 which are owned and operated by EDL. EDL holds an EPL for the generation of electricity from gas.

EDL is responsible for designing, managing and completing landfill gas construction activities and for the ongoing monitoring and maintenance of the gas field. This includes 24/7 remote monitoring of the power station, air compressors and pressure to measure and monitor the vacuum.

EDL provides SUEZ with a Monthly Report which summarises key statistics including:

- Volume of landfill gas from landfill
- Average landfill gas flow from landfill
- Percentage of CH₄, CO₂ and O₂ in landfill gas
- Vacuum on landfill
- Number of wells installed
- Volume of landfill gas flared
- Run hours of flare
- Electricity generated
- Power station outages (hours)

On average, six million cubic metres of landfill gas is generated from the landfill every month. The gas is captured by a network of wells. As at March 2021, 506 wells had been installed across the site.

The Monthly Report also discusses gas field works completed during the month and current and proposed gas field works. The March 2021 Monthly Report reported that the following gas field works had been completed during March 2021 relating to gas extraction coverage:

- 12 new vertical wells had been drilled and installed in Area I in preparation for future stockpiling and were connected to the existing collection system
- Existing pumps were relocated and installed in the newly drilled wells in Area I

- 10 new vertical wells were installed in Area B
- 5 pumps were installed in Area E.

EDL reported that it was working on the following proposals for the Lucas Heights landfill:

- Area B gas extraction works to allow for the installation of 32 vertical wells
- Progressive works program for the maintenance of gas infrastructure in active tipping areas
- Review to determine impacts to Area G from proposed over tipping works and vacuum requirements in the northern section of the landfill.

Figure 2 shows the reference flow figure from the EDL Monthly Report for March 2021. The reference flow indicates the amount of gas extracted from each well in standard cubic metres per hour (scmh).

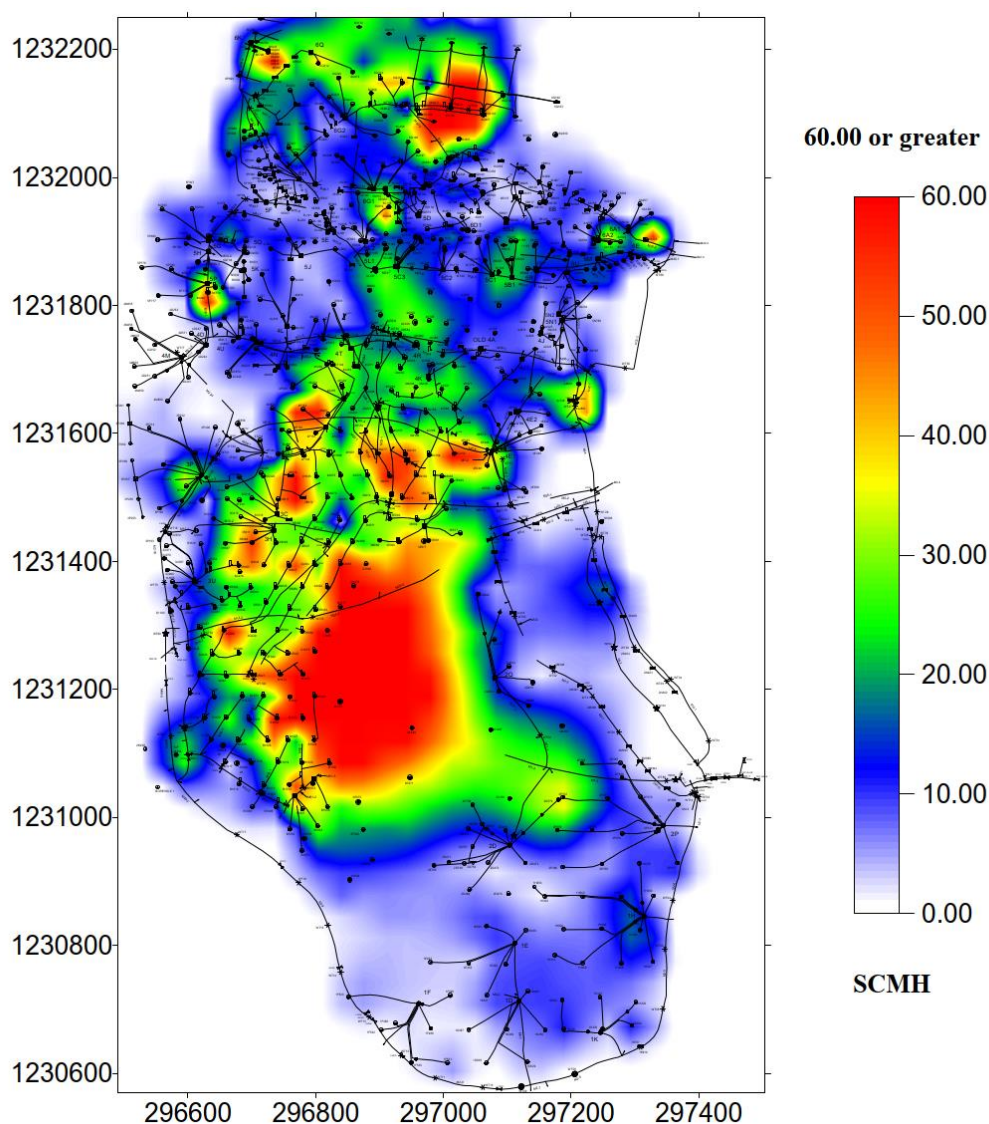


Figure 2 Gas field map, Reference Flow 30 March 2021

Flow is used as an indicator on the amount of gas available within the landfill. EDL reported that rapid changes in flow rates can be used as an indicator of damage to landfill gas wells and flow lines.



The extraction rates vary from 0 to 25 scmh on average with isolated pockets of high flowing wells. The figure has been included here to provide a visualisation of the coverage of the gas extraction system.




6.0 Site Inspection Observations




6.1 Site inspection observations




This section provides a brief overview of key observations made during the Site inspection on 4 and 5 May 2021.




The auditors were escorted around the Site by personnel (as listed in Section 1.5) who made themselves available for this purpose.

Ref	Comments	
6-1	Lucas Heights Waste to Energy Power Station	
6-2	Odour fence located south of Area B	




Ref	Comments	
6-3	Tarpomatic machine, used for placing tarpaulin as Alternate Daily Cover over the active tip face at the end of the day	
6-4	Gas extraction and temporary capping in Area B	
6-5	Area A – Active landfill	




Ref	Comments	
6-6	Area E in the foreground – Gas extraction and grass cover Area B in the background - Gas extraction and temporary capping	
6-7	Example of leachate and gas extraction infrastructure	
6-8	Main leachate dam in the foreground Emergency leachate dam in the background	

Ref	Comments	
6-9	LH1 Leachate Transfer Pumps	
6-10	Concrete storage tanks – used for storing contaminated groundwater prior to pumping to LH1 via LH1 leachate transfer pumps	
6-11	Main sediment dam	




Ref	Comments	
6-12	Mill Creek emergency pump intake, installed following leachate incident in September 2020	
6-13	Stormwater treatment plant	
6-14	Excavation of north wall	




Ref	Comments	
6-15	Soil bund along the southern perimeter of the Site	
6-16	LH1 leachate storage dam	
6-17	LH1 leachate treatment plant	




Ref	Comments	
6-18	GO Facility receivals area	
6-19	Odour fence at the GO Facility	
6-20	GO Facility leachate dam	




Ref	Comments	
6-21	GO Facility compost area	
6-22	Weeds observed in areas of the site, in particular at the edge of cleared areas. 2021 IEA REC02: Implement weed control in areas that border established vegetation.	
6-23	Small vehicle drop off – sump oil	

Ref	Comments	
6-24	Spill kit located at the small vehicle drop off	
6-25	Small vehicle drop off – asbestos containing material	
6-26	Wheel wash	

Ref	Comments	
6-27	Water treatment and reuse at the wheel wash	
6-28	TPA Workshop	
6-29	TPA Workshop – spill kit in need of refilling 2021 IEA REC03: Ensure spill kits are restocked following use.	

Ref	Comments	
6-30	TPA Workshop – banded storage	
6-31	TPA Workshop – banded and covered diesel fuel tank	
6-32	TPA Workshop – paved hardstand parking area	

Ref	Comments	
6-33	<p>Select Civil Workshop – stacked fuel storage containers</p> <p>2021 IEA REC 04:</p> <p>Review liquid storage at the Select Civil Workshop area and ensure adequate bunding is provided</p>	 <p>A photograph showing several black and blue fuel storage containers stacked on yellow pallets inside a workshop. Green signs on the wall read 'OPERATING PROCEDURES FUEL FARM' and 'OPERATING PROCEDURES PRESSURE CLEANER'. A ladder is visible in the background.</p>
6-34	<p>Select Civil Workshop – bunded and covered fuel storage</p>	 <p>A photograph of an outdoor fuel storage area with a corrugated metal roof. Large white and blue fuel storage containers are visible, along with a red fire extinguisher on the wall.</p>
6-35	<p>Select Civil Workshop – oil water separator</p>	 <p>A photograph of an oil water separator unit installed in a workshop. The unit is a large, rectangular, metallic container with a white pipe connected to it. A rusty metal grate is visible in the foreground.</p>

Ref	Comments	
6-36	Select Civil Workshop – bunded fuel storage	
6-37	Select Civil Workshop – fuel being stored in storage container with bunding	
6-38	Select Civil Workshop – spill kit fully stocked	

Ref	Comments	
6-39	Select Civil Workshop – bunded fuel storage	
6-40	Select Civil Workshop – new building	

7.0 Review of Environmental Management Plans

SUEZ manages its environmental and WH&S performance on site through its Corporate Information Management System (IMS). The SUEZ IMS is structured on the requirements of AS/NZS 4801:2001 and AS/NZS 14001:2016 and contains policies, procedures, management plans, Emergency Response Plans (ERPs), SOP and forms.

As required by CoC D12, this section of the report includes a high level review of the adequacy of the Environmental Management Plans for the LHRRP.

A review of the following management plans has been undertaken as part of this audit:

- Operational Environmental Management Plan (OEMP)
- Air Quality and Odour Management Plan (AQOMP)
- Groundwater Management Plan (GMP)
- Construction Environmental Management Plan (CEMP) for the Dual Gas and Leachate Trench
- CEMP for the GO Facility.

A high level assessment of the general adequacy of the key management plans was undertaken. It is noted that the audit team did not undertake a technical or detailed assessment of these management plans.

7.1 Operational Environmental Management Plan

To satisfy the requirements of SSD 6835, SUEZ was required to update the Draft LHRRP OEMP prepared as part of the EIS (EIS, Appendix S). This was done in October 2017 with the OEMP replacing the Landfill Environmental Management Plan (LEMP) for the Site. The OEMP for the new GO Facility or ARRT Facility had not been prepared at the time of the audit. SUEZ reported that these plans would be finalised when the design and construction of the facilities was underway.

The OEMP was updated during the audit period, on 23 October 2018, to incorporate recommendations made in the 2018 IEA report and also updated operating hours in accordance with MOD1. DPIE approval of the updated OEMP remains outstanding.

The OEMP states that it has been prepared to address:

- environmental and operational activities associated with waste receipt, recycling and landfilling located at the landfill and resource recovery centre at the LHRRP
- cumulative environmental impacts (i.e. odour) arising from all of the activities at the LHRRP
- certain aspects of LH1 which are required to support the environmental and operational activities at LHRRP.

The renewable energy generation at the LHRRP was being managed by Energy Developments Limited (EDL) through contractual arrangements with SUEZ and was therefore not included in the OEMP. EDL operates under its own EPL for the scheduled activity of generation of electrical power from gas.

The OEMP states that it has been prepared to address the following statutory requirements:

- SSD 6835
- EPL 5065
- ANSTO Lease
- VPA.

The OEMP provides management strategies for surface water, groundwater, leachate, dust, landfill gas, odour, noise, litter, vermin and weeds, traffic and visual amenity. The previous version of the OEMP (2017) included a number of appendices as summarised in Table 7-1.

The updated OEMP (October 2018) lists four appendices as forming part of the OEMP however continues to refer to appendices that were included in the previous version.

Table 7-1 OEMP and Appendices Summary

Document	Title	Revision/ Review Date	Regulatory Requirement
OEMP	OEMP – LHRRP – PLANS004	23 October 2018	SSD 6835, Condition D4
Appendix A	Conditions of Consent	5 June 2018	-
Appendix B	Environment Protection Licence 5065	10 September 2019	-
Appendix C	Reporting Template	-	-
Appendix D	Indicative Staging Plan	03 July 2015	-
Appendix E	Surface Water Management Program &	Version 1 / July 2015	-
	Surface Water Monitoring Program	2009	EPL 5065, Condition U4.1
Appendix F	Leachate Drainage System Integrity	14 July 2005	EPL 5065, Condition U7
Appendix G	Dust Management and Monitoring Plan	Version 1 / July 2015	-
Appendix H	Landfill Capping & Quality Assurance Plan	November 2008	-
Appendix I	Landfill Gas Extraction System	Version 1 / July 2015	-
Appendix J	Odour Management SOP65	20 May 2015	-
Appendix K	Complaint Investigation and Rectification Process	-	VPA
Appendix L	Weed Management Plan	-	-
Appendix M	Emergency Response Plan	2 March 2017	SSD 6835, Condition D5
Appendix N	Pollution Incident Response Management Plan	15 June 2016	POEO Act
Appendix O	Groundwater Remediation Action Plan	-	Required under DA 11-01-99
Appendix P	Landfill Surface Gas Monitoring Program	February 2006	EPL 5065, condition M8.1
Appendix Q	Landfill Subsurface Gas and Accumulation Monitoring Program	July 2015	EPL 5065, condition M8.2
Appendix R	Noise Management Plan (Truck Parking Area)	Rev 0 / 19 August 2010	Required under DA 11-01-99
Appendix S	Lists of Threatened Biota Listed under the TSC Act	10 July 2018	TSC Act

The following recommendations have been made relating to the OEMP. These also incorporate some recommendations made in the previous audit that have not been implemented where they are still considered relevant:

2021 IEA REC 05

- Update the OEMP to reflect EPL tip face requirements relating to the prepared surface, stripped back area and active tip face.
- Update OEMP to make it clearer within the OEMP that it also incorporates the requirements of Condition D1 for a CEMP for the works associated with reprofiling, stripping and landfilling on top of existing waste and seek Department approval of this approach.
- Update the OEMP to identify that the new GO Facility and ARRT Facility have not begun construction and that prior to their operation, the OEMP would be updated or a separate OEMP(s) prepared. The OEMP currently states that these OEMPs have been prepared
- Include a section within the OEMP that states that the OEMP has been prepared to address the requirements of SSD 6835, Condition D4, D5 and D7, and identify where in the plan each requirement has been addressed.
- Conduct a review to ensure appendices referred to in the text of the document are up to date and appended to the OEMP.
- Attach the AQOMP and GMP as an appendix to the OEMP, as required under SSD 6835, Condition D5.
- Update Section 8.8 Noise Control to include a plan showing noise monitoring locations
- Update Section 9.9 to reflect that the Landfill Gas Monitoring Program is no longer in Draft.

7.2 Air Quality and Odour Management Plan

The AQOMP, dated April 2018, was prepared by SUEZ in response to SSD 6835, Condition C11. The Plan had not been revised during the audit period.

The AQOMP was reviewed during the previous IEA and one recommendation identified. As stated above, the plan was not updated to reflect this recommendation. This recommendation is still considered relevant.

In addition, the AQOMP was not updated in response to new CoC C11A, following approval of MOD1.

2021 IEA REC 06:

AQOMP to be updated to include a reference to SSD 6835, Condition D8 which includes a number of triggers for updating the strategies, plans and programs required under SSD 6835.

2021 IEA REC 07:

Update AQOMP in accordance with Condition 11A and submit to DPIE

7.3 Groundwater Management Plan

The GMP, dated 31 January 2018, was prepared by Douglas Partners on behalf of SUEZ in response to SSD 6835, Condition C35. The Plan had not been revised during the audit period.

The GMP was reviewed during the previous IEA and one recommendation identified. As stated above, the plan was not updated to reflect this recommendation. This recommendation is still considered relevant.

2021 IEA REC 08:

Update Section 1.1 to include reference to where in the GMP each requirement has been addressed. In addition, include reference to CoC D8 which includes a number of triggers for updating the strategies, plans and programs required under SSD 6835.

The auditors note that the GMP (2018) has not yet been accepted by the Department as there is a disagreement over whether a licence is required for groundwater extraction.

Beatty Legal were appointed to advise SUEZ on the approval requirements under for the groundwater inflows associated with the waste cell liner depressurisation system described in Section 4.3.2 of the GMP. They concluded that:

- There is no requirement for a Water Access Licence (WAL) as “*Under the WM Act a WAL entitles the holder to shares in available water and to “take” water at specified times, at specified rates and/or in specified circumstances and in specified areas or from specified locations (s56). It is an offence to “take” water from a water source regulated by a water sharing plan (WSP) without a WAL (see e.g. s60A)... Any groundwater inflow is passive, indirect, predicted to be of a small (and diminishing) volume and of an unmeasurable volume*”.

DPI Water (formerly Natural Resources Access Regulator, NRAR) response to the advice provided by Beatty Legal/SUEZ stated that they had not been able to identify any exemptions from requiring a WAL for the proposed water take for this project, therefore the project will need to obtain the relevant WAL.

2021 IEA REC 09:

Resolve issue over requirement for a Water Access Licence and obtain DPIE approval of GMP.

7.4 Construction Environmental Management Plan – Dual Gas and Leachate Trench

The CEMP for the Dual Gas and Leachate Trench construction works was prepared in July 2017 and submitted to the EPA together with the Dual Gas and Leachate Concept Design. The EPA approved the installation of the dual gas and leachate trench on the 10 October 2017.

The CEMP was further updated on 2 October 2018 to incorporate environmental management requirements within the management plan and reduce reliance on site-specific management plans prepared by Contractors carrying out the works. The CEMP was approved by DPIE on the 9 October 2018.

2021 IEA REC 10:

Retain records including completed checklists and photographs as a record of CEMP implementation.

7.5 Construction Environmental Management Plan – GO Facility

The CEMP for the GO Facility construction works was prepared by GHD on behalf of SUEZ and submitted to DPIE on 8 April 2021. The CEMP included the following sub plans as required by the CoC:

- Vegetation and Fauna Management Plan (C43)
- Erosion and Sediment Control Plan (D2)
- Construction Traffic Management Plan (C48)

At the time of writing, DPIE was yet to provide feedback or approve the CEMP and sub plans. Given the plans were only recently developed and have yet to be approved, they have not been reviewed further as part of this IEA.

A brief review of the Construction Traffic Management Plan (CTMP) indicated it did not address the requirements of the Condition. In particular the requirement to include a Driver Code of Conduct, program to monitor the effectiveness of proposed measures and procedures for notifying residents and the community of any potential disruption routes. SSC reviewed the CTMP as part of their review of the CEMP, and their comments were included in the CEMP Appendix A. TfNSW also reviewed the CTMP however their comments were not incorporated into the Plan as required by C48.

2021 IEA REC 11:

Update Construction Traffic Management Plan meet the requirements of Condition C48 and to reflect that consultation with SSC and TfNSW occurred. Resubmit to the Department prior to commencement of construction of the GO Facility.

8.0 Summary of non-compliances and recommendations

Recommendations relating to observations of general environmental management and the adequacy of the various plans / programs are summarised in Table 8-1.

The auditors assessed compliance with Development Consent SSD 6835. The findings of this assessment is provided in Appendix A. The requirements considered to be non-compliant and the associated recommendations have been consolidated and are summarised in Table 8-2.

For a number of requirements that were assessed as compliant, opportunities for improvement (OFI) were made. These OFIs are summarised in Table 8-3.

A summary of the close out of recommendations made in the 2018 IEA is presented in Appendix B

8.1 Summary of report recommendations

A summary of the recommendations made as a result of the adequacy review of the management plans (Section 7.0) and Site observations (Section 6.0) is provided in Table 8-1.

Table 8-1 Summary of Recommendations relating to management plans, site observations

Source	#	Recommendation / Opportunity for Improvement
Site observation	2021 IEA REC 01	Review incident categorisation and ensure incidents are appropriately categorised to reflect their severity.
Site observation	2021 IEA REC 02	Implement weed control in areas that border established vegetation.
Site observation	2021 IEA REC 03	Ensure spill kits are restocked after use.
Site observation	2021 IEA REC 04	Review liquid storage at the Select Civil Workshop area and ensure adequate bunding is provided
Operational Environmental Management Plan	2021 IEA REC 05	<p>It is recommended that the OEMP is revised to consider the following:</p> <ul style="list-style-type: none"> Update the OEMP to reflect EPL tip face requirements relating to the prepared surface, stripped back area and active tip face Update OEMP to make it clearer within the OEMP that it also incorporates the requirements of Condition D1 for a CEMP for the works associated with reprofiling, stripping and landfilling on top of existing waste and seek Department approval of this approach Update the OEMP to identify that the new GO Facility and ARRT Facility have not begun construction and that prior to their operation, the OEMP would be updated or a separate OEMP(s) prepared. The OEMP currently states that these OEMPs have been prepared Include a section within the OEMP that states that the OEMP has been prepared to address the requirements of SSD 6835, Condition D4, D5 and D7, and identify where in the plan each requirement has been addressed Conduct a review to ensure appendices referred to in the text of the document are up to date and appended to the OEMP Attach the AQOMP and GMP as an appendix to the OEMP, as required under SSD 6835, Condition D5 Update Section 8.8 Noise Control to include a plan showing noise monitoring locations Update Section 9.9 to reflect that the Landfill Gas Monitoring Program is no longer in Draft.
Air Quality and Odour Management Plan	2021 IEA REC 06	AQOMP to be updated to include a reference to SSD 6835, Condition D8 which includes a number of triggers for updating the strategies, plans and programs required under SSD 6835.

Source	#	Recommendation / Opportunity for Improvement
Air Quality and Odour Management Plan	2021 IEA REC 07	Update AQOMP in accordance with Condition 11A and submit to DPIE.
Groundwater Management Plan	2021 IEA REC 08	Update Section 1.1 to include reference to where in the GMP each requirement has been addressed. In addition, include reference to CoC D8 which includes a number of triggers for updating the strategies, plans and programs required under SSD 6835.
Groundwater Management Plan	2021 IEA REC 09	Resolve issue over requirement for a Water Access Licence and obtain DPIE approval of GMP.
Dual Gas and Leachate Construction Environmental Management Plan	2021 IEA REC 10	Retain records including completed checklists and photographs as a record of CEMP implementation.
Go Facility Construction Traffic Management Plan	2021 IEA REC 11	Update Construction Traffic Management Plan meet the requirements of Condition C48 and to reflect that consultation with SSC and TfNSW occurred. Resubmit to the Department prior to commencement of construction of the GO Facility.

8.2 Summary of non-compliances

Table 8-2 Summary of Conditions assessed as non-compliant

Reference No	Condition	Evidence	Comment	Recommendations																								
B6	<p>The Applicant shall not receive more than:</p> <p>(a) 850,000 tonnes of general solid waste (putrescible and non-putrescible) and asbestos waste per year on site for landfill disposal;</p> <p>(b) 10,000 tonnes of general solid waste (non-putrescible) and batteries per year on site at the Resource Recovery Centre and waste collection point;</p> <p>(c) 80,000 tonnes of garden and wood waste per year and 2,000 tonnes of manure at the GO Facility;</p> <p>(d) 200,000 tonnes of general solid waste (putrescible and non-putrescible) per year including 10,000 tonnes of biosolids at the ARRT Facility; and</p> <p>(e) the quantity of waste required to meet the final landform profile described in the EIS.</p>	<ul style="list-style-type: none">• 2018, 2019, 2020 AEMRs• 2019 Mandalay report data• Section 88 reports for January 2018 to March 2021• SSC tonnage report spreadsheet to March 2021	<p>SUEZ records the waste type and mass received at the site via its weighbridge using the Mandalay software.</p> <p>Waste data is provided to the EPA on a monthly basis through the Section 88 Reports and also six-monthly with the volumetric survey data. A high level summary of waste volumes is provided in the Annual Review. The auditors noted that the waste limit data in the AEMRs did not record the tonnage of manure at the GO Facility.</p> <p>The auditors conducted spot checks of the AEMR data with the weighbridge data and found it to correlate.</p> <p>Table: Waste limit data from AEMR</p> <table><tr><th></th><th>2018</th><th>2019</th><th>2020</th></tr><tr><td>(a)</td><td>842,368</td><td>836,456</td><td>826,373</td></tr><tr><td>(b)</td><td>9,179</td><td>8,686</td><td>10,633</td></tr><tr><td>(c)</td><td>47,028</td><td>50,285</td><td>64,234</td></tr><tr><td>(d)</td><td>Nil</td><td>Nil</td><td>Nil</td></tr><tr><td>(e)</td><td>N/A</td><td>N/A</td><td>N/A</td></tr></table> <p>All results in Tonnes</p> <p>In 2020, the tonnage of general solid waste (non-putrescible) and batteries received at the Resource Recovery Centre exceeded the waste limit of 10,000 tonnes. SUEZ noted in the 2020 AEMR that this was due to COVID-19, as people had spent more time at home doing clean-up work, which had resulted in an increase in waste being received at the small vehicle drop off area.</p> <p>This condition has been assessed as non-compliant on the basis of the exceedance of limits at the Resource Recovery Centre. This was considered a COVID-19 related anomaly.</p>		2018	2019	2020	(a)	842,368	836,456	826,373	(b)	9,179	8,686	10,633	(c)	47,028	50,285	64,234	(d)	Nil	Nil	Nil	(e)	N/A	N/A	N/A	<p>2021 IEA REC 12 – Implement processes to periodically review / track the cumulative quantity of waste received throughout the calendar year to ensure tonnages prescribed in CoC B6 are not exceeded</p>
	2018	2019	2020																									
(a)	842,368	836,456	826,373																									
(b)	9,179	8,686	10,633																									
(c)	47,028	50,285	64,234																									
(d)	Nil	Nil	Nil																									
(e)	N/A	N/A	N/A																									
B10	<p>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 BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none">• <i>Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works; and</i>• <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the Development.</i>	<ul style="list-style-type: none">• Lucas Heights Crib Facility - Building Code of Australia Advice, Concise Certification, dated 2 June 2021	<p>During the audit period one new building was constructed. The building is a transportable structure utilised in the administrative/office section of the Select Civil workshop. The building includes office space, bathrooms and kitchen facilities.</p> <p>A BCA compliance inspection was conducted by Concise Certification on 29 May 2021 (after the audit period). The inspection report concluded that the design of the building was in compliance with the requirements of the BCA, subject to satisfying the following recommendations:</p> <ul style="list-style-type: none">• Structural Certification – Provide certification from the Structural Engineer confirming that the existing buildings and structures are structurally adequate• Floor Lining Test Report – It is recommended that test certificates be provided for the existing Floor linings confirming the Critical Radiant Flux (as tested under AS ISO 9293.1) to ensure that it is not less than CRF 2.2• Electrical Certification - Provide certification from the electrical engineer / electrician confirming all electrical works have been completed accordance with:<ul style="list-style-type: none">○ AS3000-2018 – general electrical installations○ AS 1680.0-2009 – Interior / artificial lighting• Access Certification – Provide written advice from Select Civil to confirm that upgrades for people with disabilities are not required to the subject facilities	<p>2021 IEA REC 13 – Implement recommendations in the BCA Advice report prepared by Concise Certification, dated 2 June 2021</p>																								

Reference No	Condition	Evidence	Comment	Recommendations
			<p>under the provision of BCA Clause D3.4, having regards to the staff being required to be able bodied due to the tasks performed as part of their work</p> <ul style="list-style-type: none"> Rectification Works: <ul style="list-style-type: none"> Install contrast non-slip stair nosings to the stair adjacent to the awning in accordance with AS 1428.1 – 2009 Install handrails to both sides of the stair located under the awning. <p>Given the BCA inspection was conducted after the audit period and it identified a number of recommendations to achieve compliance, this condition has been assessed as non-compliant. SUEZ reported it was working towards implementing the recommendations.</p>	
C8	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour, as defined in the POEO Act.	<ul style="list-style-type: none"> Audit site inspection Interviews with SUEZ site personnel Odour Patrol Checklist, 25 March to 3 May 2021 Pollution Reduction Program Review Report, Northstar Air Quality, June 2020 LHRRP (LH2) Landfill Gas Monitoring Program, GHD, March 2020 Notice of Variation of Licence No. 5065, dated 10 September 2019 Field Commissioning Report, dated 1 August 2019 Complaint CAR Report – 2019 to date of audit Email from SSC to SUEZ – Odour complaints, dated 11 May 2018 LHRRP Internal Compliance Audit (Odour), SUEZ, 30 April 2018 Odour Risk Reduction Study & Odour Reduction Options Report, 	<p>SUEZ undertook the following measures to mitigate odour from the LHRRP during the audit period:</p> <ul style="list-style-type: none"> Waste was reportedly covered at the end of each day An odour unit and odour fence were in place around the GO receivals area and leachate dam of the GO Facility Portable odour units were being used as required Two odour units and fencing were installed at the southern and eastern boundaries of Areas A and B The tip face was sprayed with odouriser prior to covering with tarp at the end of each day (as recommended by the PRP discussed below) Leachate dams were reportedly aerated as required Weather conditions were monitored when potentially odorous works were being undertaken An odour patrol was undertaken in the mornings in and around the site to identify potential odour. The auditors sighted the <i>Odour Patrol Checklist</i> which records the date, time and location of odour patrol undertaken for the LHRRP. The checklist includes an assessment of the strength of the odour (0-5) and a description of the odour (landfill, organic, leachate, gas). The spreadsheet indicated assessments were being completed daily (Monday to Friday) Gas collection and extraction was continuing EDL, the operators of the gas infrastructure undertake inspections and identify areas that require additional wells or additional clay cover. <p>A total of 96 complaints were received relating to odour during the audit period:</p> <p>2018 – 54 odour complaints</p> <p>2019 – 25 odour complaints</p> <p>2020 – 11 odour complaints</p> <p>2021 to the date of the audit – 6 odour complaints</p> <p>The OEMP trigger for an internal technical audit (15 or more complaints received within any calendar month) was triggered on two occasions during the audit period: March 2018 and May 2018.</p> <p>The internal technical audit conducted following the March 2018 trigger event concluded that practices outlined in the OEMP had been maintained and that possible odour sources included the tip face area where the odour suppression system being trialled had a failure, which had been repaired. Also balancing of the additional gas wells at the time may also have contributed to the odour, this work had been completed.</p>	No recommendations required

Reference No	Condition	Evidence	Comment	Recommendations
		<p>Northstar Air Quality, 15 April 2019</p> <ul style="list-style-type: none"> • Screenshot and photograph of extraction system monitoring, EDL, dated 28 May 2021 	<p>The auditors note that only one internal technical audit was conducted as the May 2018 event coincided with implementation of the technical audit conducted following the March 2018 event. SUEZ provided evidence that this had been discussed and agreed with SSC.</p> <p>In response to heightened environmental risks relating to offensive odours from the Premises identified by the EPA and the community, on 29 November 2018, the EPA required SUEZ to complete a study relating to reducing the risk of offensive odours. The Odour Risk Reduction Study was completed to the EPA's satisfaction on 15 April 2019 with the submission of the Odour Risk Reduction Report by Northstar Air Quality. The Odour Risk Reduction Report contained a number of recommendations in relation to reducing odours on the premises. EPL 5065 was varied on 10 September 2019 to require implementation of a Pollution Reduction Program (PRP) in relation to odours. In response to the PRP, SUEZ implemented the following (as reported in the independent PRP Review Report prepared by Northstar Air Quality in June 2020 and submitted to the EPA as required by the PRP):</p> <ul style="list-style-type: none"> • A trial of odour neutralisers was undertaken and following the trial, SUEZ has been applying the preferred odour suppressant to the active tipping face under the daily cover. The odour units were sighted by the auditors during the site inspection. • SUEZ advised the auditors that the following have been implemented across the Site: <ul style="list-style-type: none"> ○ <u>24/7 Remote Vacuum Monitoring</u> – EDL has installed remote pressure sensors at 10 locations across the gas collection system to measure and monitor the vacuum ○ <u>Power Station Monitoring</u> - the EDL power station is equipped with a SCADA system and is monitored by EDL's Global Control Centre ○ <u>Air Compressor Monitoring</u> – both air compressors have pressure sensors which are observed through the same system and monitor the gas collection system. <p>In addition, the newly installed compressor has remote dial in and diagnostic capabilities</p> <p>The auditors sighted a screenshot of the gas extraction system monitoring and a photograph of the EDL Global Control Centre.</p> • The Landfill Gas Monitoring Program was updated and submitted to the EPA on 3 March 2020. • The weather station was upgraded in August 2019 to include additional temperature gauges to enable monitoring of temperature inversions. • Select Civil made improvements to the odour fence including running the odour units 24/7 (as opposed to only during landfill operating hours) as well as re-positioning the units to the eastern side of the landfill and implementing measures to prevent pipework disconnection. The odour fence was inspected during the audit site inspection. • SUEZ engaged independent consultants InSitu Advisory to evaluate the feasibility of reducing the maximum area of waste exposed at any one time. The report made four recommendations including stripping back of residual cover incrementally in proportion to the quantity of new waste being emplaced and preparing the stripped back area and the waste reworking area at the same time to minimise total exposed waste areas. SUEZ reported that the report had been provided to the EPA and it was awaiting feedback from the EPA prior to implementing changes to its operating practices. 	

Reference No	Condition	Evidence	Comment	Recommendations
			<p>On the basis of the offensive odours from the premises identified by the EPA and community in 2018 this condition has been assessed as not compliant. However the auditors note that:</p> <ul style="list-style-type: none"> SUEZ has implemented the PRP and provided the EPA with the PRP Review report including the InSitu Advisory feasibility report. At the time of writing no feedback had reportedly been provided by the EPA on the PRP. SUEZ has processes in place to identify and manage odours, including investigating complaints and implementing continual improvement controls The frequency of odour complaints has reduced significantly during the audit period During the site inspection, odours were not considered to be particularly offensive. <p>No further recommendations are required.</p>	
C11A	The Applicant must update the Site Air Quality and Odour Management Plan required by Condition C11 of this consent. The updated plan must: (a) be prepared by a suitably qualified and experienced person in consultation with the EPA; (b) be submitted to the Secretary within six months of the determination of SSD 6835 MOD1; (c) detail additional mitigation measures which will be employed to prevent future odour emissions at the site; and (d) address the requirements of Condition C11 of this consent.	<ul style="list-style-type: none"> AQOMP, dated 10 April 2018 	<p>The Air Quality and Odour Management Plan was not further updated following the determination of MOD 1 to address the requirement of C11A.</p> <p>It is noted that SUEZ was in the process of submitting a second modification to the Consent to modify the GO process and increase the amount of GO accepted at the site. Should this be approved further updates to the Air Quality and Odour Management Plan will be required.</p>	2021 IEA REC 14 – Update AQOMP in accordance with Condition 11A and submit to DPIE
C36	The Applicant shall re-establish historic groundwater monitoring bores (BH24, BH31, MB021 and MB022) to improve detection of leachate in groundwater systems to the north of the site. The Applicant shall monitor groundwater from these bores in accordance with the requirements of an EPL for the site and the groundwater management plan required under Condition C35.	<ul style="list-style-type: none"> GMP, dated 31 January 2018 Notice of Variation of Licence No. 5065, dated 27 November 2018 Interviews with SUEZ site personnel 	<p>Section 5.1 of the GMP provides an assessment of the requirement to re-install BH24, BH31, MB021 and MB022. Douglas Partners recommends that BH24, BH31, MB021, MB022 are not re-instated. They have identified a gap in monitoring on the western site boundary, south of points MB305 and MB306, and therefore recommend installation of two bores in this area, prior to the commencement of operations at the GO Facility and ARRT Facility.</p> <p>As assessed during the previous IEA, DPI Water also made the following recommendations:</p> <ul style="list-style-type: none"> Refurbishment of MB022 An additional monitoring bore is strongly recommended to be installed approximately positioned 100 to 120 metres north-northwest of bores MB038 – MB039. This new monitoring bore site is considered by DPI Water as an alternative to re-establishing the three northern bores (BH31, MB021 and BH24) referred to in C36 Installation of this new nested monitoring bore site is strongly recommended by DPI Water and is proposed to be included as part of the ongoing development of the monitoring network and the landfill site. This additional 	2021 IEA REC 15 – Obtain DPIE approval of alternative bore locations

Reference No	Condition	Evidence	Comment	Recommendations
			<p>monitoring bore is to be a nested bore, including two screens, a shallow screen and a deeper screen of similar depth to MB022.</p> <p>SUEZ acknowledged the last two recommendations and installed two new monitoring wells (MB048 and MB049) in December 2017. The GMP identifies that MB022 will not be reinstated.</p> <p>The two new monitoring bores (MB048 and MB049) were added to the EPL in the November 2018 and MB022 was removed.</p> <p>The auditors have assessed this as non-compliant on the basis that historic groundwater monitoring bores have not been re-established as required by this condition and the alternative locations have not been approved by DPIE.</p> <p>The auditors do however note that SUEZ plans to incorporate the amended bore locations in the future consent modification (MOD2), which is awaiting submission.</p>	
C37	The Applicant shall store all chemicals, fuels and oils used on the site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or the EPA's <i>Storing and Handling of Liquids: Environmental Protection - Participants Handbook</i> .	<ul style="list-style-type: none"> Audit site inspection 	<p>The following fuel tanks and chemicals were stored on site at the time of the site inspection:</p> <ul style="list-style-type: none"> 60,000 L diesel tank used for refuelling collection vehicles in the Truck Parking Area (TPA) an aboveground double-skinned self-bunded 60,000 L diesel tank in the Select Civil workshop area Waste oils in two 2,000 L tanks in the Select Civil workshop area in a concrete bund Oils and coolants in intermediate bulk containers (IBCs), 205 L drums and 20 L containers in the Select Civil workshop stored on single IBC bunded spill pallets In-ground waste oil pit associated with oil water separator in the Select Civil workshop area. Waste oil from the separator is stored in a 20 L plastic container. Select Civil reported that minimal separated oil is generated. Waste oil is collected by Southern Oil Collections for off-site recycling Dangerous Goods (DG) Class 3 (Flammable Liquids) including paints and thinners, stored in a Flammable Goods cabinet. <p>Domestic quantities of waste were stored in the hazardous waste receipt area prior to collection for off-site treatment. Materials include waste oils, waste paints and batteries. These were stored in an undercover, bunded area.</p> <p>Select Civil is responsible for maintaining the Workshop area. Select Civil has its own management systems and procedures for the storage of chemicals, fuels and oils including SC-WHS-005 <i>Storage & Handling of Hazardous Materials</i>.</p> <p>During the audit site inspection, the auditors noted that bunded areas within the Select Civil workshop did not appear to be adequate for the volume of liquids being stored. The auditors noted that risk of surface water contamination was reduced because the workshop area drains to a lined basin which is reportedly pumped to the leachate treatment plant. However the requirement to store liquids in appropriately bunded areas still applies.</p> <p>Refer to main report, Section 6.0 for photos and recommendations relating to liquid storage and bund maintenance.</p>	2021 IEA REC 04 – Review liquid storage at the Select Civil Workshop area and ensure adequate bunding is provided
C49	The Applicant shall conduct a safety review of the Little Forest Road and New Illawarra Road intersection in the years 2020 and 2025 to ensure the on-going safe and efficient performance of the intersection. The safety reviews shall be prepared to the satisfaction of the Secretary and shall: (a) be prepared by an independent traffic expert;	<ul style="list-style-type: none"> Intersection Safety Review, GHD, dated January 2021 	<p>The LHRRP Intersection Safety Review for 2020 was conducted by GHD in consultation with SSC and TfNSW (formerly RMS).</p> <p>The auditors note that TfNSW consultation recorded that TfNSW had provided a remark of “no further comments or objections to this report”.</p>	2021 IEA REC 16 – Obtain TfNSW (RMS) approval of the Intersection Safety Review for 2020

Reference No	Condition	Evidence	Comment	Recommendations
	(b) be undertaken in consultation with Council and RMS and in accordance with relevant guidelines; (c) be approved by the Secretary and RMS, by the end of 2020 and 2025; (d) analyse vehicle movements and delays during peak periods; (e) establish intersection performance and the need for any intersection upgrade works; and (f) include a program for implementation of intersection upgrade works, if required.	<ul style="list-style-type: none"> • DPIE letter of approval, dated 17 February 2021 	<p>The Intersection Safety Review was approved by the Department on 17 February 2021, outside the required timeframe. TfNSW approval (as required by (c) was not obtained.</p> <p>The report did not recommend any future upgrade of the intersection. Further study was recommended to be carried out in 2025. On the basis that TfNSW (RMS) approval was not obtained and that the timeframe for Secretary approval was not met, this condition has been assessed as non-compliant</p>	
D8	<p>Within three months of:</p> <p>(a) an audit submitted under Condition D12; (b) an incident report under Conditions D10 and D11; (c) an annual review under Condition D9; and/or (d) a modification to this consent,</p> <p>the Applicant shall review, and if necessary, revise the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</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 site.</i></p>	<ul style="list-style-type: none"> • Interviews with SUEZ site personnel • AQOMP, dated 10 April 2018 • OEMP, dated 23 October 2018 • 2018 IEA report 	<p>a. The OEMP was updated following the 2018 IEA to incorporate the 2018 IEA findings and updated operating hours in line with MOD1.</p> <p>b. There was no evidence that the management plans had been reviewed following the reportable leachate incident on the 30 September (refer D10).</p> <p>c. The management plans had not been reviewed following submission of the AEMRs.</p> <p>d. The AQOMP was not updated for MOD 1 in accordance with Condition C11A. On the basis that the plans had not been reviewed and updated following the leachate incident, annual reviews and MOD 1, this condition has been assessed as non-compliant.</p>	2021 IEA REC 17 - Implement a process to ensure management plans are reviewed (and revised if necessary) following a reportable incident, Annual Review and/or Modification to the consent. Ensure the review process is documented, in particular where plans are reviewed but do not require revision.
D10	Upon detecting an exceedance of the limits/performance criteria in this consent or the occurrence of an incident that causes (or may cause) material harm to the environment, the Applicant shall immediately (or as soon as practical thereafter) notify the Secretary and any other relevant agencies of the exceedance/incident.	<ul style="list-style-type: none"> • 30 October 2019 surface gas exceedance incident, letter to EPA dated 31 October • 17 December 2019 surface gas exceedance incident, letter to EPA dated 7 January 2020 • 30 September 2020 leachate discharge incident report • SUEZ email to DPIE – Incident reporting for Lucas Heights, dated 8 October 2020 	<p>SUEZ reported one incident that had the potential to cause material harm to the environment during the audit period. The incident occurred on 30 September 2020 and resulted in leachate entering the stormwater system and subsequently entering a nearby creek. SUEZ reported that the EPA was notified immediately via phone. DPIE was notified of the incident by email and written report on 8 October 2020.</p> <p>Incidents involving an exceedance of the limits/performance criteria in this consent occurred during the audit period were as follows:</p> <ul style="list-style-type: none"> • 2018 - none • 2019 – none, however the auditors note there were exceedances with EPL criteria for surface gas • 2020 – waste limit exceeded – not reported to DPIE or EPA <p>On the basis that the Department was not notified immediately (or as soon as practical thereafter) of the exceedance of the annual waste limit or the leachate discharge incident, this condition has been assessed as non-compliant.</p>	2021 IEA REC 18 – Implement a process to ensure the Department is notified immediately of any exceedance of trigger values or limits
D12	<p>Within one year of the date of this consent, and every three years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the site. The audit must:</p> <p>(a) be carried out by a suitably qualified, experienced and independent audit team whose appointment has been endorsed by the Secretary; (b) assess the environmental performance of the site, and its effects on the surrounding environment; (c) determine whether the site is complying with the relevant standards, performance measures and statutory requirements; (d) review the adequacy of the Environmental Management Plans for the site, compliance with this consent, and any other licences and consents; and, if necessary; (e) recommend measures or actions to improve the environmental performance of the site, and/or any plan/program required under this consent.</p>	<ul style="list-style-type: none"> • 2021 IEA audit report 	<p>This report presents the findings of the second independent environmental audit (site inspections undertaken on the 4 and 5 May 2021).</p> <p>As this audit was not conducted within three years of the previous audit (dated 23 January 2018) the timing of the audit has been assessed as not compliant with this condition. The auditors note that the delay was due in part to audit team availability and uncertainty over COVID-19 procedures.</p> <p>a. The audit was conducted by suitably qualified and experienced auditors from AECOM. Helen Onus (lead auditor), Shani Walton (auditor), Kelly Pearsall (Technical Reviewer) were approved by the Department by letter dated 4 February 2021.</p> <p>b. The environmental performance of the site is assessed in Section 5.</p>	2021 IEA REC 19 – Ensure IEAs are conducted within 3 years

Reference No	Condition	Evidence	Comment	Recommendations
			<p>c. Refer to relevant conditions requiring assessment of relevant standards, performance measures and statutory requirements.</p> <p>d. Refer to the main report for a review of the adequacy of the EMPs required under this consent. This report presents the findings of the assessment of compliance with the conditions of consent.</p> <p>A number of recommendations have been made through this report. These recommendations are summarised in Section 8.</p>	
D15	<p>The Applicant shall make the following information publicly available on its website and keep the information up to date.</p> <p>(a) the EIS, RTS, CEMP and OEMPs;</p> <p>(b) current statutory consents, approvals and licences for the site;</p> <p>(c) approved strategies, plans and programs;</p> <p>(d) a summary of all monitoring data for the site as required under this consent;</p> <p>(e) a complaints register, updated on an annual basis;</p> <p>(f) Annual Reviews, Independent Environmental Audits and the Applicant's response to the recommendations; and</p> <p>g) any other matter required by the Secretary.</p> <p><i>Note: This requirement does not require any confidential information to be made available to the public.</i></p>	<ul style="list-style-type: none"> • SUEZ website 	<p>The following information was available on the SUEZ website, when reviewed on the 16 May 2021:</p> <ul style="list-style-type: none"> • Development Consent (SSD 6835), dated 23 January 2017 • MOD 1 (SSD 6835) dated 23 September 2019 • EPL 12520, dated 22 August 2018 • OEMP for the LHRRP, dated March 2017. As noted in the 2018 IEA, this is not the most recent version of the OEMP. SUEZ needs to update the website to include Version 2, dated 13 October 2017. In addition, the Appendices to the OEMP had not been attached on the website. • A link to the DPE Major Projects Assessment website for SSD 6835, which includes the EIS and RTS. • AEMR 2019 • 2018 IEA Audit Report • Environmental Report Action Plan • CEMP for the dual gas and leachate trench • Surface Gas Monitoring Reports • Pollution Incident Response Management Plan (PIRMP) dated May 2020 • Environment Policy dated 2017. <p>The following documents required under this condition were not provided on the website:</p> <ul style="list-style-type: none"> • Noise monitoring data from the annual noise monitoring report, required under Condition C56. • Complaints register • Air quality and odour management plan (Condition C11) • Groundwater management plan (Condition C35) • Emergency response plan (Condition C63) • AEMRs for 2018 and 2020 <p>Current EPL 5065, 10 September 2019 (website had older version, November 2018).</p>	<p>2021 IEA REC 20 – Ensure all of the documents required by Condition D15 are uploaded onto the SUEZ website</p>

8.3 Summary of opportunities for improvement

The following table has been reproduced from this report and Appendix A. For details on the requirement, and for further discussion of the issue, please refer directly to the tables in Appendix A. Many recommendations are based around continuous improvement opportunities identified during the audit and do not necessarily represent immediate potential non-compliance issues.

Table 8-3 Recommendations for Conditions considered compliant for improved compliance or continuous improvement

Reference	#	Opportunity for Improvement
B6	2021-IEA-OFI 01	Record tonnage of manure received at the GO Facility within the AEMRs
B11	2021-IEA-OFI 02	Undertake structural adequacy inspection of concrete leachate tanks as part of a routine maintenance schedule
C5	2021-IEA-OFI 03	Update the OEMP to reflect EPL tip face requirements relating to the prepared surface, stripped back area and active tip face
C26	2021-IEA-OFI 04	Review the risk of leachate overtopping the GO Facility leachate pond and entering the stormwater system and implement additional controls as required
C63	2021-IEA-OFI 05	Submit the most recent ERP to the Secretary
D1	2021-IEA-OFI 06	Update OEMP as per previous IEA recommendation to make it clearer within the OEMP that it also incorporates the requirements of Condition D1 for a CEMP for the works associated with reprofiling, stripping and landfilling on top of existing waste and seek Department approval of this approach
D9	2021-IEA-OFI 07	Include further discussion of trends and monitoring data within the AEMRs including discussion of whether investigation trigger levels have been triggered. Consider including trigger levels and licence limits on graphs to facilitate comparison of results with the criteria

9.0 Limitations

AECOM Australia Pty Limited (AECOM) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of SUEZ Recycling and Recovery Pty Ltd and only those third parties who have been authorised in writing by AECOM to rely on this Report.

It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this Report.

It is prepared in accordance with the scope of work outlined in our proposal dated 18 January 2021.

Where this Report indicates that information has been provided to AECOM by third parties, AECOM has made no independent verification of this information except as expressly stated in the Report. AECOM assumes no liability for any inaccuracies in or omissions to that information.

This Report was prepared between May 2021 and June 2021 and is based on the conditions encountered and information reviewed at the time of preparation. AECOM disclaims responsibility for any changes that may have occurred after this time.

This Report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This Report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

Except as required by law, no third party may use or rely on this Report unless otherwise agreed by AECOM in writing. Where such agreement is provided, AECOM will provide a letter of reliance to the agreed third party in the form required by AECOM.

To the extent permitted by law, AECOM expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this Report. AECOM does not admit that any action, liability or claim may exist or be available to any third party.

Except as specifically stated in this section, AECOM does not authorise the use of this Report by any third party.

It is the responsibility of third parties to independently make inquiries or seek advice in relation to their particular requirements and proposed use of the site.

Any estimates of potential costs which have been provided are presented as estimates only as at the date of the Report. Any cost estimates that have been provided may therefore vary from actual costs at the time of expenditure.

Appendix A Compliance Checklist

Audit Checklist/Protocol-Lucas Heights Resource Recovery Park – 2021 IEA

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
B1	In addition to meeting the specific performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the Development.		<p>The auditors conducted a review of incident occurrences at the Site during the audit period, complaints received, as well as a review of the general environmental performance of the site with various environmental management plans.</p> <p>Other than where issues were identified, measures have generally been implemented to prevent and/or minimise harm to the environment.</p>	Compliant
TERMS OF CONSENT				
B2	<p>The Applicant shall carry out the Development in accordance with the:</p> <p>(a) EIS and RTS;</p> <p>(b) Development plans and drawings in the EIS and RTS (see Appendix A);</p> <p>(c) the Management and Mitigation Measures (see Appendix B);</p> <p>(d) the draft Landfill, GO, ARRT and Post Closure Environmental Management Plans included in the EIS; and</p> <p>(e) modification application SSD 6835 MOD 1 and the accompanying environmental assessment titled Report for SUEZ Recycling and Recovery Pty Ltd – Modification to LHRRP Operation Hours, prepared by GHD and dated January 2018.</p>	<ul style="list-style-type: none"> • Interview with SUEZ Landfill Manager • Site Inspection • Lucas Heights Survey Plan, Matthew Freeburn Land, Engineering & Mining Surveyor, dated December 2020 • New Illawarra Landfill Capping Works – Area D and Area E – Construction Quality Assurance Report, GHD, May 2021 	<p>(a) A detailed assessment of compliance with the EIS and RTS was not undertaken. Based on a high level review, the following are noted:</p> <ul style="list-style-type: none"> • The new Garden Organics (GO) Facility and Advanced Resource Recovery Technology (ARRT) Facility described in the EIS were yet to be constructed at the time of the audit and as such the environmental benefits from these facilities were not being realised. SUEZ reported that it was still in the design stage for these works. Final plans have been prepared for the GO facility and submitted to the Department, including Construction Environmental Management Plan (CEMP), Aquatic Habitat Monitoring Plan (C33) and Mill Creek Stream Rehabilitation, Stabilisation and Vegetation Management Plan (C34). • SUEZ reported that it was preparing a new modification application (MOD 2) to change the GO process (instead of using a membrane as per the EIS, SUEZ proposes to use composting tunnels). MOD 2 will also request a number of general, mostly administrative, amendments to the consent and will include a proposal to increase the amount of GO received at the site from 80,000 tonnes/yr to 100,000 tonnes/yr and to increase the yearly input rate at the landfill from 850,000 tonnes/yr to 970,000 tonnes/yr, until commencement of the ARRT Facility operation. At the time of writing, the modification application for MOD 2 was yet to be submitted • Re-profiling and capping of the landfilling in Areas D and E had been completed, Area B had been filled, and landfilling in Area A had commenced (between Phase 3 and Phase 4 in the EIS staging plan). Landfilling appeared to be carried out generally in accordance with the EIS. • SUEZ had constructed a new 3 ML sediment dam to capture sediment from the Stage 5-3 area. This sediment dam was not specifically described in the EIS however was discussed more broadly in Section 13.4 of the EIS as a management and mitigation measure to “design and operate sediment dams and traps to promote sedimentation”. <p>(b) The phasing plan from the EIS was provided to the landfill contractor, Select Civil, to develop the more detailed fill platform drawings (in consultation with SUEZ). Whilst the</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p>sequencing has changed from that proposed in the EIS for operational reasons relating to managing gas, leachate and surface water, the overall footprint remains the same.</p> <p>SUEZ implements the following measures to ensure that it does not work outside of the approved boundary:</p> <ul style="list-style-type: none"> Re-profiling plans are submitted to the EPA prior to the commencement of re-profiling and are approved by the EPA and included within the EPL (Condition E7) A survey plan is submitted to the EPA on a six-monthly basis. The auditors sighted the survey plan for December 2020 Construction Quality Assurance (CQA) plans and as-built records are provided to the EPA when the capping works are completed. The auditors sighted the CQA report prepared by consultant GHD for the Capping Works in Area D and Area E. The CQA report concluded that the capping works undertaken over Area D and Area E were constructed generally in accordance with the final design documentation. <p>(c) The Management and Mitigation Measures included in Appendix B have been included in the appropriate management plans. A review of the management plans and their implementation is provided under the specific conditions relating to the plans.</p> <p>(d) As discussed, the GO and ARRT were yet to be constructed.</p> <p>(e) At the time of the audit, the site was operating under the new hours as outlined in SSD 6835 MOD1, refer to Condition C53. A detailed assessment of compliance with the environmental assessment was not undertaken.</p>	
B3	If there is any inconsistency between the plans and documentation referred to in Condition B2 above, 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.		Not triggered during the audit period.	Not triggered
B4	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of: (a) any reports, plans or correspondences that are submitted in accordance with this consent; and (b) the implementation of any actions or measures contained in these documents.	<ul style="list-style-type: none"> 2018, 2019, 2020 AEMRs 	The preparation, including consultation with the Department, required for each environmental management plan and implementation is discussed against the relevant consent condition.	Compliant
LIMITS OF CONSENT				
B5	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under Section 95 of the EP&A Act.		SUEZ commenced re-profiling in January 2018. No work has commenced on construction of the GO and ARRT Facilities	Noted
B6	<p>The Applicant shall not receive more than:</p> <p>(a) 850,000 tonnes of general solid waste (putrescible and non-putrescible) and asbestos waste per year on site for landfill disposal; (b) 10,000 tonnes of general solid waste (non-putrescible) and batteries per year on site at the Resource Recovery Centre and waste collection point; (c) 80,000 tonnes of garden and wood waste per year and 2,000 tonnes of manure at the GO Facility; (d) 200,000 tonnes of general solid waste (putrescible and non-putrescible) per year including 10,000 tonnes of biosolids at the ARRT Facility; and (e) the quantity of waste required to meet the final landform profile described in the EIS.</p>	<ul style="list-style-type: none"> 2018, 2019, 2020 AEMRs 2019 Mandalay report data Section 88 reports for January 2018 to March 2021 SSC tonnage report spreadsheet to March 2021 	<p>SUEZ records the waste type and mass received at the site via its weighbridge using the Mandalay software.</p> <p>Waste data is provided to the EPA on a monthly basis through the Section 88 Reports and also six-monthly with the volumetric survey data. A high level summary of waste volumes is provided in the Annual Review. The auditors noted that the waste limit data in the AEMRs did not record the tonnage of manure at the GO Facility.</p> <p>The auditors conducted spot checks of the AEMR data with the weighbridge data and found it to correlate.</p>	<p>Non-compliant</p> <p>2021 IEA REC 12 – Implement processes to periodically review / track the cumulative quantity of waste received throughout the calendar year to ensure tonnages prescribed in CoC B6 are not exceeded</p> <p>2021 IEA OFI 01 – Record tonnage of manure received at the GO Facility within the AEMRs</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation																												
			<table><tr><th colspan="4">Table: Waste limit data from AEMR</th></tr><tr><th></th><th>2018</th><th>2019</th><th>2020</th></tr><tr><td>(a)</td><td>842,368</td><td>836,456</td><td>826,373</td></tr><tr><td>(b)</td><td>9,179</td><td>8,686</td><td>10,633</td></tr><tr><td>(c)</td><td>47,028</td><td>50,285</td><td>64,234</td></tr><tr><td>(d)</td><td>Nil</td><td>Nil</td><td>Nil</td></tr><tr><td>(e)</td><td>N/A</td><td>N/A</td><td>N/A</td></tr></table> <p>All results in Tonnes</p> <p>In 2020, the tonnage of general solid waste (non-putrescible) and batteries received at the Resource Recovery Centre exceeded the waste limit of 10,000 tonnes. SUEZ noted in the 2020 AEMR that this was due to COVID-19, as people had spent more time at home doing clean-up work, which had resulted in an increase in waste being received at the small vehicle drop off area.</p> <p>This condition has been assessed as non-compliant on the basis of the exceedance of limits at the Resource Recovery Centre. This was considered a COVID-19 related anomaly.</p>	Table: Waste limit data from AEMR					2018	2019	2020	(a)	842,368	836,456	826,373	(b)	9,179	8,686	10,633	(c)	47,028	50,285	64,234	(d)	Nil	Nil	Nil	(e)	N/A	N/A	N/A	
Table: Waste limit data from AEMR																																
	2018	2019	2020																													
(a)	842,368	836,456	826,373																													
(b)	9,179	8,686	10,633																													
(c)	47,028	50,285	64,234																													
(d)	Nil	Nil	Nil																													
(e)	N/A	N/A	N/A																													
B7	The receipt, processing and disposal of waste at the landfill, GO and ARRT facilities shall cease at the end of 2037.		Not triggered	Not triggered																												
OTHER CONSENT AND APPROVALS																																
B8	Within 6 months of the date of this consent, the Applicant shall modify DA 11-01-99 to remove the conditions of that consent that relate to the LHRRP. The modification shall be in accordance with the <i>Environmental Planning and Assessment Regulation, 2000</i> . The modification is required to ensure all activities undertaken at the LHRRP are covered by this consent only.	<ul style="list-style-type: none">DA 11-01-99 MOD 11 – Instrument of Modification	<p>An application to modify DA 11-01-99 was submitted to the Department on 13 September 2017. The Modification was approved by the Department on 23 September 2019, following submission of landowner consent.</p> <p>It was noted in the previous audit that this application was not submitted within 6 months of the date of the consent and this was assessed as an administrative non-compliance.</p>	Compliant																												
STATUTORY REQUIREMENTS																																
B9	The Applicant shall ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	<ul style="list-style-type: none">SSD 6835 MOD 1 – Modification InstrumentNotice of Variation of Licence No. 5065, dated 27 November 2018Notice of Variation of Licence No. 5065, dated 25 March 2019Notice of Variation of Licence No. 5065, dated 10 September 2019Approval of the Surrender of Licence No. 13114, dated 30 July 2019Consent to Discharge Industrial Trade Wastewater, dated 23 May 2019	<p>The Site has the following licences, permits and approvals/consents:</p> <ul style="list-style-type: none">Development Consent SSD 6835SSD 6835 MOD 1 – Extension of landfill operating hours, dated 5 June 2018EPL 5065 - covers operations at LHRRP<ul style="list-style-type: none">varied on 27 November 2018 to:<ul style="list-style-type: none">incorporate the requirement to conduct a Pollution Studyreflect the updated Landfill Gas Monitoring Program requirementsremove conditions related to landfill gas infrastructure works that had been completedincrease operational hoursupdate the description of monitoring point locations and enable sampling of adjacent or representative monitoring wells for quarterly monitoring where wells are not able to be sampledallow a trial of an alternative daily cover material to be conducted.varied on 25 March 2019 to allow the covering of asbestos waste with general solid waste and Virgin Excavated Natural Material (VENM) and to update the definition of VENM	Compliant																												

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<ul style="list-style-type: none"> varied on 10 September 2019 to: <ul style="list-style-type: none"> allow the use of Mixed Waste Organic Outputs (MWOO) as Alternative Daily Cover as a trial require implementation of a Pollution Reduction Program provide clarity as to the requirements surrounding the tip face EPL 12520 – covers operation of the existing GO facility Trade Wastewater Agreement with Sydney Water which is renewed every 24 months, the agreement was sighted by the auditors, dated 23 May 2019 Voluntary Planning Agreement (VPA) with Sutherland Shire Council, dated 17 March 2017. Requirements of the VPA were not reviewed as part of this audit The ANSTO Agreement under which SUEZ lease land owned by ANSTO <p>Whether the site requires a groundwater extraction licence is the subject of ongoing discussions between SUEZ and DPI (refer to Condition C35).</p> <p>EPL 13114 – which covered the operation of the Police and Community Youth Club (PCYC) minibike club – was surrendered on 30 July 2019.</p> <p>No other approvals were reportedly required during the audit period.</p>	
STRUCTURAL ADEQUACY				
B10	<p>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 BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works; and Part 8 of the EP&A Regulation sets out the requirements for the certification of the Development. 	<ul style="list-style-type: none"> Lucas Heights Crib Facility - Building Code of Australia Advice, Concise Certification, dated 2 June 2021 	<p>During the audit period one new building was constructed. The building is a transportable structure utilised in the administrative/office section of the Select Civil workshop. The building includes office space, bathrooms and kitchen facilities.</p> <p>A BCA compliance inspection was conducted by Concise Certification on 29 May 2021 (after the audit period). The inspection report concluded that the design of the building was in compliance with the requirements of the BCA, subject to satisfying the following recommendations:</p> <ul style="list-style-type: none"> Structural Certification – Provide certification from the Structural Engineer confirming that the existing buildings and structures are structurally adequate Floor Lining Test Report – It is recommended that test certificates be provided for the existing Floor linings confirming the Critical Radiant Flux (as tested under AS ISO 9293.1) to ensure that it is not less than CRF 2.2 Electrical Certification - Provide certification from the electrical engineer / electrician confirming all electrical works have been completed accordance with: <ul style="list-style-type: none"> AS3000-2018 – general electrical installations AS 1680.0-2009 – Interior / artificial lighting Access Certification – Provide written advice from Select Civil to confirm that upgrades for people with disabilities are not required to the subject facilities under the provision of BCA Clause D3.4, having regards to the staff being 	<p>Non-compliant</p> <p>2021 IEA REC 13 – Implement recommendations in the BCA Advice report prepared by Concise Certification, dated 2 June 2021</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p>required to be able bodied due to the tasks performed as part of their work</p> <ul style="list-style-type: none"> Rectification Works: <ul style="list-style-type: none"> Install contrast non-slip stair nosings to the stair adjacent to the awning in accordance with AS 1428.1 – 2009 Install handrails to both sides of the stair located under the awning. <p>Given the BCA inspection was conducted after the audit period and it identified a number of recommendations to achieve compliance, this condition has been assessed as non-compliant. SUEZ reported it was working towards implementing the recommendations.</p>	
OPERATION OF PLANT EQUIPMENT				
B11	The Applicant shall ensure that all plant and equipment used for the Development are: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	<ul style="list-style-type: none"> Plant Assessor database sighted during audit site inspection Supply and Installation of Geosynthetic Liners: Suez Lucas Heights WMF – Leachate Dam Upgrade – Construction Quality Assurance Report, Ecoline Solutions, dated 19 June 2019 MAINPAC Maintenance Work Plan for GO Facility, April 2018 to August 2020 Leachate Inventory and Operations Daily Checklists Landfill Monthly Checklist, December 2020 SCADA leachate management system Operation and Plant Condition Report, JPG Engineering, March 2021 Monthly Reports, Energy Developments, January 2018 to March 2021 SUEZ 'Landfill – Competency Skill Matrix' sighted during audit site inspection Select Civil Extended Duration Contractor 	<p>(a) A number of procedures were in place to maintain plant and equipment in a proper and efficient condition, these included:</p> <p><u>Landfill</u> Select Civil was responsible for maintaining plant and equipment used on the landfill. Select Civil used a number of methods including:</p> <ul style="list-style-type: none"> Pre-start checklists The Plant Assessor database which tracks required regular maintenance requirements and issues noted in pre-start checklists On-site maintenance workshop for non-major repairs. For major repairs plant and equipment is sent off-site to Select Civils workshop Calibration/Inspection and Testing of Equipment Register. <p>During the site inspection the auditors sighted maintenance records in the Plant Assessor database for the Tarpomatic, Odour system, generators and surface water pumps. Records were assessed as adequate.</p> <p><u>GO Facility</u> SUEZ was responsible for maintaining the GO Facility plant and equipment, and leachate dam. SUEZ used a number of methods including:</p> <ul style="list-style-type: none"> Pre-start checklists The MAINPAC system which tracks required regular maintenance and issues noted in pre-start checklists. <p>The auditors were provided with maintenance schedules generated by MAINPAC for 3-monthly inspections on stackers, shredders, fire protection service and vehicles.</p> <p><u>Leachate management system</u> The leachate management system (LH1 leachate treatment plant, leachate storage tanks and leachate dams) was being maintained by JPG Engineering. JPG used a number of methods including:</p> <ul style="list-style-type: none"> A Leachate Inventory and Operations Daily Checklist completed on a daily basis. Auditors sighted the completed checklists 	<p>Compliant</p> <p>2021 IEA OFI 02 – Undertake structural adequacy inspection of concrete leachate tanks as part of a routine maintenance schedule</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
		Audit dated 15 September 2020	<ul style="list-style-type: none"> Monitoring of leachate levels through SCADA which sends low flow, high level alarm alerts to JPG Engineering. JPG view the SCADA system online and receive emergency updates and alarms, for example high-level leachate alarms. Auditors sighted the SCADA system as viewed on site by JPG site personnel Leachate system is automated and can be controlled remotely through SCADA. If leachate levels are high, leachate is automatically pumped to the LH1 leachate treatment plant. An additional reactor was added to the LH1 leachate treatment plant in 2019 in order to increase the treatment capacity JPG Engineering provides an Operation and Plant Condition Report to SUEZ on a monthly basis. The report includes the weekly inspections for the wheel wash, stormwater treatment plant, leachate and ammonia treatment plant (LH1), leachate transfer pumps, Stage 5/3 leachate riser pump facility, grass drain stormwater recirculation pump, excavation water/groundwater transfer pump, PCYC dust suppression transfer pump, LH2 intermediate pump station, LH2 leachate storage dams. The auditors were provided with the Operation and Plant Condition Report for March 2021. <p><u>Main leachate dam</u> During the audit site inspection, the auditors observed that the liner of the main leachate dam had been repaired. This had been observed during the 2018 and 2015 IEAs as 'lifted' (referred to as 'whaling' in the geomembrane).</p> <p>The auditors were provided with the Construction Quality Assurance Report for the leachate dam upgrade.</p> <p><u>Emergency leachate dam</u> The emergency leachate dam was approximately 50% full at the time of the audit. It was reported that levels had increased following a heavy rainfall event in March 2021. Pumps installed in both the main and emergency leachate dams allow the transfer of leachate between the dams and up to the LH1 Treatment Plant for treatment and disposal.</p> <p><u>Storage tanks</u> SUEZ reported that the old leachate treatment plant (comprising four concrete tanks) were being used for holding groundwater from Area 5 (old unlined and single lined section of landfill) which has the potential to be contaminated with leachate. A structural adequacy review of the tanks undertaken in 2016 recommended that these tanks be inspected every two years. This has not been undertaken.</p> <p><u>Stormwater treatment plant and basins</u> The stormwater treatment plant and sedimentation basins were being maintained by JPG Engineering. JPG monitor through SCADA which sends low flow, high level alarm alerts to JPG Engineering. JPG view the SCADA system online and receive emergency updates and alarms, for example high-level alarms. The auditors reviewed the following stormwater management procedures:</p>	

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p>SOP 069.1 Water Management – Landfills and organic Sites - states that for emergencies on site relating to water, SUEZ personnel should refer to the site specific ERP.</p> <p>PLANS003 Emergency Response Plan (ERP) includes Action Plan – Leachate Spill which states “<i>If safe to do so, restrict the spread of the spill (erect bund or dam, restrict pipe flow). Control spill with available equipment and PPE</i>”</p> <p>The site-specific work instruction, WI040.1 - Weekend Stormwater Management – Lucas Heights sets out instructions for SUEZ personnel on the weekend arrangement for:</p> <ul style="list-style-type: none"> collecting samples in the event of overflow discharges from the main sediment dam starting operation of the Stormwater Treatment Plant (STP) if required. <p>The Overflow Monitoring Procedure sets out the process for taking and storing samples, with analytes including ammonia, prior to sending for laboratory analysis. The procedure also outlines how the STP can be put into operation remotely to reduce the duration of an overflow event from the sediment dam. The auditors note that the STP is designed to remove sediment, not ammonia and that the quality of final effluent can be determined visually via a camera screen during discharge.</p> <p><u>Landfill gas</u> EDL provide a monthly report to SUEZ which shows methane concentration, flow and gas volumes, broken monitoring points, which wells are not producing gas (due to malfunction or low gas volume). EDL operates under a separate EPL. The auditors were provided with monthly reports.</p> <p><u>Weighbridge</u> The weighbridges are calibrated annually. The auditors sighted the weighbridge Repair and Verification Reports, issued by Standard Scales and Services Pty Ltd for Inwards weighbridge, Weighbridge and Outwards weighbridge, dated 31 May 2018.</p> <p>(b) Each contractor on-site is contractually responsible for employing suitably trained and competent staff.</p> <p><u>Select Civil</u> Select Civil reported that it completes provides training on SUEZ Standard Operating Procedures (SOPs). Training records were provided to the auditors for SC-SOP-007 <i>Refuelling with Diesel</i> (25 February 2021), SC-SOP-99 <i>Hazardous Substances and Dangerous Goods</i> (20 December 2018), SC-SOP-016 <i>Asbestos Waste Burial</i> (23 April 2020), SC-SOP-020 <i>Waste Handling and Disposal</i> (5 February 2019), SC-SOP-022 <i>Rejection of Unacceptable Loads</i> (14 February 2019), SC-SOP-024 <i>Dust Control</i> (28 November 2019), SC-SOP-025 <i>Litter Control</i> (27 January 2020), SC-SOP-026 <i>Surface Water Management</i> (1 March 2019), SC-SOP-028 <i>Disposal of Special Industrial</i> (28 February 2019), SC-SOP-038 <i>Receipt & Safe Handling of Dusty Waste Streams</i> (20 March 2019), SC-SOP-040 <i>Ground Breaking – General Guidelines</i> (26 March 2019), SC-SOP-044 <i>Oil Spill Response & Workshop Maintenance</i> (4 April 2019).</p> <p><u>SUEZ</u> Training records for SUEZ staff were being maintained in SIMs. The 'Landfill – Competency Skill Matrix' is a register which</p>	

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p>records SUEZ staff training and flags training requirements. Auditors sighted the SUEZ training matrix during the audit site inspection.</p> <p>SUEZ conduct extended duration contractor audits on an annual basis which include a review of training requirements.</p> <p>Summary SUEZ implements a number of controls to maintain and operate plant and equipment in an efficient manner. Based on the evidence noted above, this condition has been assessed as compliant.</p>	
PROTECTION OF PUBLIC INFRASTRUCTURE				
B12	Prior to the commencement of construction, the Applicant shall: (a) prepare a dilapidation report of the public infrastructure in the vicinity of the site (including roads, kerbs, footpaths, nature trip, street trees and furniture); and (b) submit a copy of this report to the Secretary and Council.	<ul style="list-style-type: none"> SUEZ email to SSC – Dilapidation Report – April 2017, dated 2 March 2018 	<p>A dilapidation report was prepared and submitted to the Secretary during the previous audit period. As noted in the 2018 IEA, the report was not sent to SSC prior to construction commencing in January 2018.</p> <p>SUEZ reported that the dilapidation report was issued to SSC on 2 March 2018.</p>	Compliant
B13	The Applicant shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged as a result of 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.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel 	Not triggered during the audit period.	Not triggered
STAGED SUBMISSION OF PLANS OR PROGRAMS				
B14	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program for the landfill re-profiling, GO Facility and ARRT Facility construction and operation, required by this consent, on a progressive basis; and/or (b) combine any strategy, plan or program required by this consent.	<ul style="list-style-type: none"> Go Facility and ARRT Facility request for approval of staged construction – letter from SUEZ to the Department, dated 21 April 2021 	<p>During the previous audit period SUEZ had received approval from the Department for the staged submission of the Air Quality and Odour Management Plan and the Groundwater Management Plan to cover the re-profiling stage of SSD 6835 and not the construction and operation of the new GO and ARRT Facilities, which will come later.</p> <p>SUEZ has written to the Department to request further approval of staged construction, with construction of the GO Facility scheduled to commence in 2021 (pending approval) and construction of the ARRT Facility in 2031 or later. At the time of writing the Department had not provided a response.</p>	Compliant
DISPUTE RESOLUTION				
B15	<p>In the event that a dispute arises between the Applicant and either 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.</p> <p><i>Note: This condition does not relate to disputes raised regarding matters in the Voluntary Planning Agreement required under Condition 8 19.</i></p>	<ul style="list-style-type: none"> Interviews with SUEZ site personnel 	Not triggered during the audit period.	Not triggered

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
COMPLIANCE				
B16	The Applicant shall ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	<ul style="list-style-type: none"> SUEZ Toolbox Talk Minutes – Development Consent, dated 26 November 2018 Record of Toolbox Meeting – 5am Approval of the landfill opening, Select Civil, dated 6 June 2018 Internal Audit – Extended Duration Contractor – Select Civil dated 15 September 2020 	<p>SUEZ reported that SUEZ employees and contractors were made aware of the conditions of consent through Operational Environmental Management Plan (OEMP) training and toolbox talks. Training in relation to the Development Consent and Change in Opening Hours was carried out by SUEZ and Select Civil in 2018.</p> <p>SUEZ provides contractors with a copy of the consent for their records. The consent, EIS and EPL are also provided as part of the Select Civil contract (Tender Documents).</p> <p>The environmental management plans required under this consent are implemented by SUEZ and provided to contractors e.g. Select Civil.</p> <p>SUEZ conducts audits of its main contractors on a routine basis. An 'Extended Duration Contractor' audit of Select Civil was undertaken in September 2020 and noted to include environmental aspects.</p>	Compliant
B17	The Applicant shall be responsible for environmental impacts resulting from the actions of all persons that it invites onto the site, including contractors, sub-contractors and visitors.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel 	<p>SUEZ is aware that it has ultimate responsibility of the site and the actions of its contractors, sub-contractors and visitors.</p> <p>SUEZ reported that it requires visitors, site personnel and contractors to complete an on-line induction, site induction and permits to work for confined spaces, breaking ground etc. Visitors are accompanied on-site.</p> <p>Contractors, sub-contractors and visitors are required to report incidents to SUEZ as documented in the PROC008-<i>Incident Reporting and Corrective Action Procedure</i>.</p>	Compliant
EVIDENCE OF CONSULTATION				
B18	Where consultation with any public authority or community group is required by the conditions of this consent, the Applicant shall: (a) consult with the relevant public authority or community group prior to submitting the required documentation to the Secretary 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 or community group and an explanation of or agreement between any public authority or community group and the Applicant or any person acting on this Development consent.	<ul style="list-style-type: none"> GMP, dated 31 January 2018 AQOMP, dated April 2018 CEMP for the Dual Gas and Leachate Trench construction works, dated 2 October 2018 Email to the Department dated 30 October 2018 regarding ERP consultation with attached correspondence from SSC and RFB CEMP for the GO Facility, dated April 2021 	<p>Consultation with public authorities and/or community groups has been discussed against the specific conditions below. The following plans include records of consultation with the relevant agencies as appendices:</p> <ul style="list-style-type: none"> Groundwater Management Plan (GMP) – EPA and DPI Water consultation attached Air Quality and Odour Management Plan (AQOMP) – EPA, SSC, DPE consultation attached in Appendix 13 Construction Environmental Management Plan (CEMP) for the Dual Gas and Leachate Trench construction works - SSC consultation attached in Appendix 2 Emergency Response Plan (ERP) - auditors sighted an email to the Department dated 30 October 2018 regarding ERP consultation with correspondence from SSC and Rural Fire Brigade (RFB) attached CEMP for the GO Facility – SSC consultation attached in Appendix A 	Compliant
PLANNING AGREEMENT				
B19	Prior to the commencement of construction and prior to receiving increased tonnes of waste in accordance with Condition B6(a), the Applicant shall enter into the Voluntary Planning Agreement with Council in accordance with the Letter of Offer dated 15 December 2016.	2018 IEA, AECOM, April 2018	As noted in the 2018 IEA, a Voluntary Planning Agreement (VPA) was entered into by SUEZ and SSC on 17 March 2017. This Condition is considered complete.	Complete

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
WASTE Receipt, Storage & Handling of Waste				
C1	The Applicant shall only receive waste on site that is authorised for receipt by an EPL.	<ul style="list-style-type: none"> Excel extracts of weighbridge data for following periods: <ul style="list-style-type: none"> - January to June 2018 - July to December 2018 - January to June 2019 - July to December 2019 - January to February 2020 - March to June 2020 - July to December 2020 Section 88 reports for January 2018 to March 2021 Rejected load register for 27 December 2020 to 30 April 2021 	<p>The Landfill is authorised to receive general solid waste (putrescible and non-putrescible), asbestos waste, tyres, leachate and other waste below licensing thresholds by EPL 5065.</p> <p>The existing GO Facility is authorised to receive excavated natural material, wood waste, garden waste, VENM, manure and fly ash by EPL 12520.</p> <p>Reports on the types and quantities of waste received are provided to the EPA on a monthly basis in accordance with requirements under Section 88 of the POEO Act.</p> <p>SUEZ has developed SOP40 <i>Waste Acceptance and Receipt</i> to ensure waste is received that is compatible with site design and regulatory requirements. If a delivery of waste arrives which is not licensed to be received at the site, it was reported that it would be rejected by the weighbridge personnel.</p> <p>Rejected waste may include, for example, asbestos which is not appropriately wrapped; soil without the appropriate paperwork and radioactive waste (picked up by radiation meter at weighbridge). The auditors reviewed the weighbridge data which records the rejected loads. The majority of the rejected loads related to asbestos which had not been wrapped.</p> <p>The site appears to have processes in place to ensure that only allowable waste is received at the site.</p> <p>Based on a high level review of the waste data supported by screening and rejection procedures, SUEZ was considered to comply with this condition. Full verification of compliance with this condition is not considered practicable as part of the audit.</p>	Compliant
C2	The Applicant shall ensure any waste generated on the site during construction is classified in accordance with the EPA's <i>Waste Classification Guidelines, 2014</i> or its latest version, and disposed of to a facility that may lawfully accept the waste.	<ul style="list-style-type: none"> Interview with SUEZ Landfill Manager Site Inspection 	<p>Construction activities were limited to re-profiling of the landfill during the audit period (removal of intermediate cover). Construction of ARRT and GO had not commenced.</p>	Compliant
C3	The Applicant shall: (a) implement auditable procedures to: i) ensure the site does not accept wastes that are prohibited; ii) screen incoming waste loads; and (b) ensure that: i) all waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; and ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel SOP40 <i>Waste Acceptance and Receipt</i> SOP030.3 <i>Radioactive Waste</i> Work Instruction WI063.6 <i>Asbestos Waste Management</i> SUEZ Training Attendance Record – Waste Acceptance and Receipt, dated 4 July 2019 Select Civil Training Record – Managing Public Drop off, dated 23 April 2019 	<p>(a) SUEZ has developed SOP40 <i>Waste Acceptance and Receipt</i> to ensure waste is received that is compatible with site design and regulatory requirements.</p> <p>SUEZ explained that the following measures are implemented to screen incoming waste loads:</p> <ul style="list-style-type: none"> Incoming loads are visually screened by the weighbridge operator where possible and any waste that is not licensed to be received at the site is rejected Waste brought to site by the public are sent to the public waste drop-off where SUEZ staff monitor waste disposed of at the respective drop-off point e.g. general waste, green waste, mattresses and e-waste Asbestos must be bagged appropriately to be disposed of on-site, otherwise the load is rejected A Rejected Load Form is completed for all rejected loads and they are recorded in a rejected load register <p>(b) LHRRP does not accept any trackable waste other than asbestos.</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
		<ul style="list-style-type: none"> Record of unscanned loads for April 2021 	<p>As a waste receiving facility, LHRRP is required under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i>, clause 79, to track asbestos waste weighing more than 100 kilograms, or consisting of more than 10 square metres of asbestos sheets in one load using the EPA's online system called WasteLocate.</p> <p>There is a WasteLocate QR code installed at the weighbridge. Customers with asbestos scan the code upon arrival to fulfil the online reporting requirement. For those who don't scan the code, SUEZ put a remark on the transaction. At the end of each month, SUEZ provides a list to EPA which includes all transactions that have not been able to scan the code.</p> <p>Weighbridge staff and staff at the public drop off are trained in SOP40 and other relevant SOPs including SOP030.3 <i>Radioactive Waste</i> and Work Instruction WI063.6 <i>Asbestos Waste Management</i>.</p>	
Monitoring				
C4	The Applicant shall provide details of the quantity, type and source of wastes received on the site and provide these details to the EPA and the Secretary when requested.	<ul style="list-style-type: none"> Section 88 reports for January 2018 to March 2021 	<p>The Mandalay reporting system manages waste in and out of site.</p> <p>Section 88 reports were submitted to the EPA on a monthly basis. Auditors were provided with the Section 88 reports for January 2018 to March 2021.</p> <p>SUEZ reported that the Department has not requested waste records be provided during the audit period.</p>	Compliant
Landfill Operations				
C5	<p>To minimise the potential for odour generation, the Applicant shall, unless otherwise agreed in writing by the EPA:</p> <p>(a) ensure a maximum of 1 hectare of existing intermediate cover or 2 hectares of existing final capped cover may be stripped in advance of landfilling to form the prepared surface. The prepared surface must have a minimum depth of 300 millimetres;</p> <p>(b) at any one time a maximum of 2,500 metres squared of the prepared surface may be stripped back to expose previously landfilled waste to form the active tip face; and</p> <p>(c) the landfill gas field infrastructure must be retained and operating at all times, with the exception of the stripped back prepared surface.</p>	<ul style="list-style-type: none"> OEMP, dated 23 October 2018 SUEZ letter to the EPA – RE Invitation to show cause-Breach of licence conditions 11 September 2018 and 2 November 2018, dated 20 December 2018 Notice of Variation of Licence No. 5065, dated 10 September 2019 Landfill Daily Checklist, dated 2 May 2021 	<p>On 3 May 2019 the EPA wrote to LHRRP regarding its findings in relation to alleged non-compliance with conditions regarding:</p> <ul style="list-style-type: none"> exposure of previously landfilled waste on 11 September 2018 the size of the active tip face on 2 November 2018. <p>As part of these findings, the EPA found that the licence required amendment to provide clarity as to the requirements surrounding the tip face. These amendments included:</p> <ul style="list-style-type: none"> Condition E8.1 Special Dictionary has been updated to define the terms: <ul style="list-style-type: none"> <i>Prepared Surface</i> - a maximum area of 1 hectare of existing intermediate cover or 2 hectares of existing final capped cover that is stripped of cover in advance of landfilling <i>Stripped Back Area</i> - the area of the Prepared Surface that is stripped back to expose previously landfilled waste <i>Active Tip Face</i> - the area being actively landfilled Condition O5.12 has been updated to refer to retaining capping of at least 300mm in depth instead of having a minimum depth of 300mm Condition O5.13 has been updated to refer to the <i>Stripped Back Area</i> instead of the <i>Active Tipface</i> New condition O5.14 added which restricts the Active Tip face to no more than 2,500m² at any one time 	<p>Compliant</p> <p>2021 IEA OFI 03 – Update the OEMP to reflect EPL tip face requirements relating to the prepared surface, stripped back area and active tip face</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<ul style="list-style-type: none"> New condition O5.15 added which permits the exposure of landfilled waste to achieve final landfill level contours within the Stripped Back Area New condition O5.16 restricts the maximum amount of landfilled waste at any one time, unless approved by the EPA in writing or for emergency conditions. <p>SUEZ captures landfill operation requirements in Section 7.4.5 of the OEMP, which has not been updated since October 2018.</p> <p>Auditors sighted the Landfill Daily Checklist for 2 May 2021. The checklist included the following:</p> <ul style="list-style-type: none"> Approximate Active Landfill area 2,400m² Final Cap Prep Area 2,500m² Intermediate Cap Prep Area 10,000m² <p>During the site inspection the auditors sighted the extension of landfill gas infrastructure on the stripped back prepared surface. SUEZ noted that these wells were disconnected during filling but will be recommissioned following completion of the lift in that area. This process will be repeated until the final landform is reached and final capping is complete. The remaining gas infrastructure within the landfill remains operational, less those which are offline for maintenance reasons. This information is recorded in the EDL monthly report.</p>	
Imported Soil				
C6	<p>The Applicant shall:</p> <p>(a) ensure that only VENM or ENM or other material approved in writing by the EPA is used as fill on the site;</p> <p>(b) keep accurate records of the volume and type of fill to be used; and</p> <p>(c) make these records available to the Secretary upon request.</p>	<ul style="list-style-type: none"> Stockpile Assessment, Elizabeth Drive Landfill, GHD, June 2012 M4-M5 Link Tunnel Spoil Order Assessment Albert Street St Peters, JM Environments, dated 29 May 2019 GHD letter – Seal bearing layer material assessment, dated 13 January 2020 EPA email – EPA response to SUEZ request for change to final cap for Lucas Heights Landfill, dated 10 February 2020 July, November and December 2020 Section 88 Report Volumetric Survey & Checklist – EPA December 2020 Weighbridge data July-December 2020 	<p>(a) SUEZ reported that the only material imported for use as fill on site during the audit period was VENM clay from Elizabeth Drive and tunnel spoil from St Peters, used for final capping material on Areas D and E.</p> <p>The monthly Section 88 Reports provided to the EPA include the volume of final capping VENM brought onto site as an operational purpose deduction. The auditors compared the quantity of VENM for final capping reported in the November and December 2020 Section 88 Reports with the quantity of VENM included in the weighbridge data for July, November and December 2020 and confirmed that they correlated.</p> <p>SUEZ provided the auditors with stockpile reports for Elizabeth Drive and St Peters. SUEZ advised that a report was prepared by GHD in January 2020 in support of the use of tunnel and quarry spoil in the seal bearing surface of the final cap. The auditors sighted a letter from the EPA accepting the use of this material.</p> <p>(b) SUEZ uses the Mandalay weighbridge system to record the types and quantities of materials imported to site. The weighbridge data included the waste category of VENM. SUEZ also commission a landfill volumetric survey and stockpile survey every six months (June and December) which details the type and volume of stockpiles (including VENM) and landfill capacity details. This report is submitted to the EPA on a six monthly basis.</p> <p>(c) SUEZ reported that no requests for records were made by the Secretary during the audit period.</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
C7	During construction, the Applicant shall ensure any material brought on site for use as fill meets the requirements of the relevant Resource Recovery Order and Exemption issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , to apply that material to land. The Applicant shall retain records of all material brought on site for filling purposes and provide the records to the EPA and the Secretary when requested.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel 	Construction activities during the audit period were limited to trench construction. No material was used as fill.	Not triggered
ODOUR & AIR QUALITY Limits				
C8	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour, as defined in the POEO Act.	<ul style="list-style-type: none"> Audit site inspection Interviews with SUEZ site personnel Odour Patrol Checklist, 25 March to 3 May 2021 Pollution Reduction Program Review Report, Northstar Air Quality, June 2020 LHRRP (LH2) Landfill Gas Monitoring Program, GHD, March 2020 Notice of Variation of Licence No. 5065, dated 10 September 2019 Field Commissioning Report, dated 1 August 2019 Complaint CAR Report – 2019 to date of audit Email from SSC to SUEZ – Odour complaints, dated 11 May 2018 LHRRP Internal Compliance Audit (Odour), SUEZ, 30 April 2018 Odour Risk Reduction Study & Odour Reduction Options Report, Northstar Air Quality, 15 April 2019 Screenshot and photograph of extraction system monitoring, EDL, dated 28 May 2021 	<p>SUEZ undertook the following measures to mitigate odour from the LHRRP during the audit period:</p> <ul style="list-style-type: none"> Waste was reportedly covered at the end of each day An odour unit and odour fence were in place around the GO receivals area and leachate dam of the GO Facility Portable odour units were being used as required Two odour units and fencing were installed at the southern and eastern boundaries of Areas A and B The tip face was sprayed with odouriser prior to covering with tarp at the end of each day (as recommended by the PRP discussed below) Leachate dams were reportedly aerated as required Weather conditions were monitored when potentially odorous works were being undertaken An odour patrol was undertaken in the mornings in and around the site to identify potential odour. The auditors sighted the <i>Odour Patrol Checklist</i> which records the date, time and location of odour patrol undertaken for the LHRRP. The checklist includes an assessment of the strength of the odour (0-5) and a description of the odour (landfill, organic, leachate, gas). The spreadsheet indicated assessments were being completed daily (Monday to Friday) Gas collection and extraction was continuing EDL, the operators of the gas infrastructure undertake inspections and identify areas that require additional wells or additional clay cover. <p>A total of 96 complaints were received relating to odour during the audit period:</p> <p>2018 – 54 odour complaints</p> <p>2019 – 25 odour complaints</p> <p>2020 – 11 odour complaints</p> <p>2021 to the date of the audit – 6 odour complaints</p> <p>The OEMP trigger for an internal technical audit (15 or more complaints received within any calendar month) was triggered on two occasions during the audit period: March 2018 and May 2018.</p> <p>The internal technical audit conducted following the March 2018 trigger event concluded that practices outlined in the OEMP had been maintained and that possible odour sources included the tip face area where the odour suppression system being trialled had a failure, which had been repaired. Also balancing of the additional gas wells at the time may also have contributed to the odour, this work had been completed.</p>	<p>Non-compliant</p> <p>No recommendations required</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p>The auditors note that only one internal technical audit was conducted as the May 2018 event coincided with implementation of the technical audit conducted following the March 2018 event. SUEZ provided evidence that this had been discussed and agreed with SSC.</p> <p>In response to heightened environmental risks relating to offensive odours from the Premises identified by the EPA and the community, on 29 November 2018, the EPA required SUEZ to complete a study relating to reducing the risk of offensive odours. The Odour Risk Reduction Study was completed to the EPA's satisfaction on 15 April 2019 with the submission of the Odour Risk Reduction Report by Northstar Air Quality. The Odour Risk Reduction Report contained a number of recommendations in relation to reducing odours on the premises. EPL 5065 was varied on 10 September 2019 to require implementation of a Pollution Reduction Program (PRP) in relation to odours. In response to the PRP, SUEZ implemented the following (as reported in the independent PRP Review Report prepared by Northstar Air Quality in June 2020 and submitted to the EPA as required by the PRP):</p> <ul style="list-style-type: none"> • A trial of odour neutralisers was undertaken and following the trial, SUEZ has been applying the preferred odour suppressant to the active tipping face under the daily cover. The odour units were sighted by the auditors during the site inspection. • SUEZ advised the auditors that the following have been implemented across the Site: <ul style="list-style-type: none"> ○ <u>24/7 Remote Vacuum Monitoring</u> – EDL has installed remote pressure sensors at 10 locations across the gas collection system to measure and monitor the vacuum ○ <u>Power Station Monitoring</u> - the EDL power station is equipped with a SCADA system and is monitored by EDL's Global Control Centre ○ <u>Air Compressor Monitoring</u> – both air compressors have pressure sensors which are observed through the same system and monitor the gas collection system. In addition, the newly installed compressor has remote dial in and diagnostic capabilities <p>The auditors sighted a screenshot of the gas extraction system monitoring and a photograph of the EDL Global Control Centre.</p> <ul style="list-style-type: none"> • The Landfill Gas Monitoring Program was updated and submitted to the EPA on 3 March 2020. • The weather station was upgraded in August 2019 to include additional temperature gauges to enable monitoring of temperature inversions. • Select Civil made improvements to the odour fence including running the odour units 24/7 (as opposed to only during landfill operating hours) as well as re-positioning the units to the eastern side of the landfill and implementing measures to prevent pipework disconnection. The odour fence was inspected during the audit site inspection. • SUEZ engaged independent consultants InSitu Advisory to evaluate the feasibility of reducing the maximum area of waste exposed at any one time. The report made four 	

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p>recommendations including stripping back of residual cover incrementally in proportion to the quantity of new waste being emplaced and preparing the stripped back area and the waste reworking area at the same time to minimise total exposed waste areas. SUEZ reported that the report had been provided to the EPA and it was awaiting feedback from the EPA prior to implementing changes to its operating practices.</p> <p>On the basis of the offensive odours from the premises identified by the EPA and community in 2018 this condition has been assessed as not compliant. However the auditors note that:</p> <ul style="list-style-type: none"> SUEZ has implemented the PRP and provided the EPA with the PRP Review report including the InSitu Advisory feasibility report. At the time of writing no feedback had reportedly been provided by the EPA on the PRP. SUEZ has processes in place to identify and manage odours, including investigating complaints and implementing continual improvement controls The frequency of odour complaints has reduced significantly during the audit period During the site inspection, odours were not considered to be particularly offensive. <p>No further recommendations are required.</p>	
C9	<p>The Applicant shall:</p> <p>(a) operate and maintain all facilities within the site in a condition which controls the emission of dust; and</p> <p>(b) carry out all reasonable and feasible measures to minimise dust from the site.</p>	<ul style="list-style-type: none"> Dust deposition monitoring 2018 to 2020 Weather station dust monitoring results, 2018 to present SUEZ meeting notes – Lucas Heights Sutherland Shire Council Meeting, dated 10 March 2021 2018, 2018 & 2020 AEMR Interviews with SUEZ site personnel 	<p>SUEZ implemented the following dust controls, as detailed in the OEMP, during the audit period:</p> <ul style="list-style-type: none"> A wheel wash was being used to minimise tracking of dirt onto roads in wet weather Select Civil had one water truck in operation during the audit period The GO Facility had a water cart in operation during the audit period. <p>The AQOMP includes requirements for dust management and monitoring. Included in the plan are the following performance criteria:</p> <ul style="list-style-type: none"> Monthly dust deposition monitoring is undertaken at 6 gauges on site and shall not exceed 4 g/m²/month (annual mean). The auditors reviewed the dust deposition monitoring data for 2018 to 2020 and noted all dust gauges had annual averages below the 4 g/m²/month level with the exception of October 2019 through to January 2020, and also in April to November 2020. <p>SUEZ noted in the 2019 AEMR that high dust readings were recorded in the latter months of 2019, due to dust and fires which affected air quality through most of Eastern Australia, there were no contributing factors from the landfill.</p> <p>SUEZ noted in the 2020 AEMR that high dust readings recorded were due to works being undertaken on the Northern wall and the importation of clay and shale in this area for future cover. SUEZ advised that elevated dust levels were due to works being carried out close to the dust gauge and that this had been discussed with SSC. The auditors sighted SUEZ-SSC quarterly meeting notes in</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p>which it had been recorded that SSC agreed that dust levels on site were acceptable.</p> <ul style="list-style-type: none"> Total suspended particulates (TSP) are monitored continuously and should not exceed 90 µg/m³ (annual average). TSP monitoring has been undertaken at LHRRP since April 2017 using a real-time continuous dust monitor. The annual averages for 2018 to 2020 were: <ul style="list-style-type: none"> 2018 - 213.20 µg/m³, with high levels recorded from October until December 2018 noted as “<i>Due to equipment issues</i>” 2019 – 43.61 µg/m³, with zero recorded in April and in September-October 2019 noted as “<i>Equipment fault</i>” 2020 – 13.96 µg/m³, well below the target value of 90µg/m³. 2021 – 1.75 µg/m³, average recorded to the date of the audit <p>The SUEZ complaints register reported that no dust complaints were received during the audit period.</p>	
Meteorological Monitoring				
C10	The Applicant shall install, operate and maintain a meteorological weather station on the site that complies with the requirements of an EPL for the site.	<ul style="list-style-type: none"> SUEZ Lucas Heights RRP Weather Station Data, January 2018 to December 2020 Field Commissioning Report, dated 1 August 2019 	<p>SUEZ operates a meteorological weather station as required by Condition M4.1 of EPL 5065.</p> <p>The weather station was upgraded in August 2019, as required by the EPA Pollution Reduction Program, to include temperature gauges at 2 metres above ground level and 10 metres above ground level, to monitor potential temperature inversions.</p> <p>SUEZ provided the weather data from 1 January 2018 to 31 December 2020 to the auditors.</p>	Compliant
Site Air Quality and Odour Management Plan				
C11	The Applicant shall prepare a Site Air Quality and Odour Management Plan. The plan shall: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person in consultation with the EPA and Council; (b) be submitted to the Secretary prior to the commencement of construction; (c) list all emission sources across the LHRRP and key performance indicators for each emission type; (d) describe odour and dust monitoring methods, location, frequency and duration; (e) show the locations of real-time dust monitors on and off-site with appropriate trigger values; (f) report on the performance of the site against the key performance indicators for each emission type; (g) detail proactive mitigation measures for the control of dust and odour impacts; (h) detail the contingency measures to be implemented to respond to complaints or if dust or odour impacts are identified; and (i) include record keeping, a complaints register and compliance reporting. 	<ul style="list-style-type: none"> AQOMP, dated April 2018 2018 IEA, AECOM April 2018 SUEZ email to DPIE – Air Quality and Odour Management Plan, dated 25 May 2018 	<p>The Air Quality and Odour Management Plan for the landfill re-profiling works and existing GO facility was prepared during the previous audit period and submitted to the Department in February 2018. An assessment of whether the Plan addressed the requirements of this condition was presented in the 2018 IEA.</p> <p>The Plan was updated in April 2018 in response to SSC comments and submitted to the Department on 25 May 2018.</p>	Compliant
C11A	The Applicant must update the Site Air Quality and Odour Management Plan required by Condition C11 of this consent. The updated plan must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person in consultation with the EPA; (b) be submitted to the Secretary within six months of the determination of SSD 6835 MOD1; (c) detail additional mitigation measures which will be employed to prevent future odour emissions at the site; and (d) address the requirements of Condition C11 of this consent. 	<ul style="list-style-type: none"> AQOMP, dated 10 April 2018 	<p>The Air Quality and Odour Management Plan was not further updated following the determination of MOD 1 to address the requirement of C11A.</p> <p>It is noted that SUEZ was in the process of submitting a second modification to the Consent to modify the GO process and increase the amount of GO accepted at the site. Should this be approved further updates to the Air Quality and Odour Management Plan will be required.</p>	<p>Non-compliant</p> <p>2021 IEA REC 14 – Update AQOMP in accordance with Condition 11A and submit to DPIE</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
Landfill				
C12	The Applicant shall conduct an odour audit of the landfill to validate the odour reductions described in the EIS have been achieved at the existing landfill. The odour audit shall: (a) be prepared by a suitably qualified and experienced person in consultation with the EPA and Council; (b) be submitted to the EPA, Council and the Secretary at least one month prior to the commencement of landfill re-profiling; (c) include collection and analysis of odour samples in accordance with the EPA's <i>Approved Methods for Sampling and Analysis of Air Pollutants in NSW</i> ; and (d) identify mitigation measures with a timeline for implementation, where the odour reductions identified in the EIS are not being achieved.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel Notice of Variation of Licence No. 5065, dated 10 September 2019 Pollution Reduction Program Review Report, Northstar Air Quality, June 2020 	<p>The final LHRRP Landfill Odour Audit was issued to the Department on 26 October 2017 and to SSC on 2 April 2018.</p> <p>The auditors note that SUEZ were unable to close the comments as site conditions had changed since the EIS in 2014 so that the audit was no longer relevant.</p> <p>The requirements of this condition are considered complete.</p> <p>The EPA have since required an odour study be conducted under the Pollution Reduction Program, which is discussed further under Condition C8.</p>	Complete
GO Facility				
C13	All organic material and waste shall be stored at the GO Facility in accordance with the requirements of an EPL for the site, including limits on the height of stockpiles and use of breathable membrane covers on compost bunkers.		Not triggered during the audit period. New GO Facility yet to be constructed.	Not triggered
C14	The Applicant shall conduct an odour audit of the GO Facility to validate the odour data used in the EIS. The odour audit shall: (a) be prepared by a suitably qualified and experienced person in consultation with the EPA and Council; (b) be submitted to the EPA, Council and the Secretary within 6 months of commencement of operation of the GO Facility as described in the EIS; (c) include collection and analysis of odour samples in accordance with the EPA's <i>Approved Methods for Sampling and Analysis of Air Pollutants in NSW</i> ; (d) validate the efficiencies of the odour controls, specifically the covers used for the active composting stage; (e) validate the odour data for freshly turned material; (f) demonstrate that the final design achieves an equivalent or better performance than stated in the EIS, supported by dispersion modelling in accordance with EPA's <i>Approved Methods for Sampling and Analysis of Air Pollutants in NSW</i> , if required; and (g) identify additional mitigation measures with a timeline for implementation, where odour performance significantly differs from the predictions in the EIS.		Not triggered during the audit period. New GO Facility yet to be constructed.	Not triggered
ARRT Facility Biofilter and Pre-Treatment System				
C15	The Applicant shall appoint an appropriately qualified and experienced person to design the ARRT Facility, biofilter and pre-treatment and post-treatment systems. The biofilter, pre-treatment and post-treatment systems shall be designed and constructed to: (a) achieve the point source discharge parameters detailed in the EIS, as a minimum; and (b) achieve a maximum odour emission concentration of 250 OU/m ³ at discharge. If 250 OU/m ³ cannot be achieved, the Applicant shall implement the pre-treatment and post-treatment systems, in accordance with the requirements of the EPA and in a timeframe approved by the Secretary.		Not triggered during the audit period. ARRT Facility yet to be designed and constructed.	Not triggered
Pre-Operation				
C16	Prior to the commencement of operation of the ARRT Facility, the Applicant shall: (a) provide written evidence to the EPA and the Secretary, from an independent odour expert to verify the final design parameters and actual stack parameters for the pre-treatment system and biofilter; (b) prepare an odour verification report for the pre-treatment, biofilter and post-treatment system, prepared by an independent odour expert, to verify: a. the systems are fully commissioned prior to operation of the ARRT Facility; and b. approve the odour control system and the odour management plan required under Condition C17.		Not triggered during the audit period. ARRT Facility yet to be constructed.	Not triggered
Air Quality and Odour Management Plan				
C17	The Applicant shall prepare an Air Quality and Odour Management Plan for the ARRT Facility. The plan shall: (a) be prepared by an independent odour expert in consultation with the EPA and Council; (b) be submitted to the EPA, Council and the Secretary prior to the commencement of operation of the ARRT Facility; (c) include an odour management strategy containing:		Not triggered during the audit period. ARRT Facility yet to be constructed.	Not triggered

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
	i. objectives and targets; ii. odour risk assessment; iii. biofilter and pre-treatment monitoring and maintenance plan; iv. air quality monitoring plan; v. communications strategy; and vi. system and performance review for continuous improvement.			
Biofilter and Pre-Treatment Monitoring and Maintenance Plan				
C18	The Applicant shall prepare a Biofilter and Pre-Treatment Monitoring and Maintenance Plan as required under Condition C17. The plan shall: (a) be prepared by an independent odour expert endorsed by the Secretary; (b) be prepared in consultation with the EPA and Council; (c) be submitted to the EPA, Council and the Secretary prior to the commencement of operation of the ARRT Facility; (d) include a method for monitoring biofilter and pre-treatment performance that identifies biofilter and pre-treatment performance indicators that can be monitored via the process control room computer systems; (e) detail all proposed actions to ensure the biofilter and pre-treatment system is maintained for operation in a proper and efficient manner including, but not limited to, frequency of replacement/replenishment of filter bed material; and (f) identify mitigation actions to be taken in the event of breakdown and/or servicing of the biofilter and/or pre-treatment system.		Not triggered during the audit period. ARRT Facility yet to be constructed.	Not triggered
Operating Conditions				
C19	All waste receivable, processing, storage and dispatch associated with the ARRT Facility must be completely enclosed within sealed buildings that are operated under negative pressure.		Not triggered during the audit period. ARRT Facility yet to be constructed.	Not triggered
C20	The Applicant shall ensure all air captured through the ARRT Facility buildings are treated through a biofilter and approved pre-treatment system prior to discharge to atmosphere.		Not triggered during the audit period. ARRT Facility yet to be constructed.	Not triggered
Odour Audit				
C21	The Applicant shall conduct an odour audit of the ARRT Facility to validate the odour data used in the EIS. The odour audit shall: (a) be prepared by an independent odour expert in consultation with the EPA and Council; (b) be submitted to the EPA, Council and the Secretary within 6 weeks of commencement of operation of the ARRT Facility and again after 6 months of operation; (c) include collection and analysis of odour samples in accordance with the EPA's <i>Approved Methods for Sampling and Analysis of Air Pollutants in NSW</i> ; (d) validate the efficiencies of the odour controls, including the biofilter(s) and pre-treatment system; (e) demonstrate the final design achieves an equivalent or better performance than stated in the EIS, supported by dispersion modelling in accordance with EPA's <i>Approved Methods for Sampling and Analysis of Air Pollutants in NSW</i> , if required; and (f) identify additional mitigation measures with a timeline for implementation, where odour performance significantly differs from the predictions in the EIS.		Not triggered during the audit period. ARRT Facility yet to be constructed.	Not triggered
GREENHOUSE GAS				
C22	The Applicant shall implement all reasonable and feasible measures to minimise energy use on site and greenhouse gas emissions produced on site.	<ul style="list-style-type: none"> • NGERs Solid Waste Calculator FY1920, FY1819, FY1718 • Monthly EDL Reports 	<p>SUEZ is required to report its energy use and greenhouse gas emissions under the National Greenhouse Gas and Energy Reporting Scheme (NGERs). This is done at the corporate level with input from the facilities.</p> <p>The main method in which SUEZ minimises greenhouse gas emissions is through the efficient operation of the gas infrastructure. The gas infrastructure installed on site collects landfill gas and converts it to electricity or where this is not possible the landfill gas is flared. This is managed by EDL. The EDL Monthly Report provides statistics including the amount of methane used in power generation and the amount of electricity produced. EDL has an economic incentive to maximise the amount of landfill gas collected and converted to electricity, reducing greenhouse gas emissions.</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
LEACHATE				
Landfill – Dual Gas and Leachate Trench				
C23	The Applicant shall design and install a dual gas and leachate management trench near the perimeter of the re-profiled landfill to intercept sideways movement of leachate. The trench shall: (a) be designed in accordance with the requirements of the EPA; (b) be approved by the EPA, prior to construction of the trench and landfill re-profiling; (c) include extraction risers along the length of the trench to allow extraction and transfer of leachate to the existing ring main; and (d) be installed in accordance with a CEMP, prepared by a suitably qualified person and submitted to the EPA at least one month prior to construction of the trench.	<ul style="list-style-type: none"> EPL variation application – sighted screen shot of online submission 2018 IEA, AECOM, April 2018 CEMP for the Dual Gas and Leachate Trench construction works, dated 2 October 2018 	<p>The preparation of the CEMP for the dual gas and leachate trench construction works was assessed in the previous IEA.</p> <p>Installation of the dual gas and leachate management trench commenced end 2017/early 2018 and is still ongoing. To date, the trench has been installed in Area B, Area D and Area A. SUEZ advised the auditors that they will start to install in Area G in the next 2 months.</p> <p>An EPL variation request was submitted for Phase 5 Area G on 20 April 2021, including trench location, section and details.</p> <p>The trench was being constructed by Select Civil, with SUEZ carrying out informal inspection of work on a daily basis. No environmental incidents have been reported to date. SUEZ advised that they undertake informal supervision of construction works in the form of daily site inspections.</p>	Compliant
Landfill Gas Infrastructure				
C24	The Applicant shall maintain and operate the landfill gas infrastructure on the site, at all times. The Applicant shall retain and operate the gas collection system within the prepared surface (stripped back cover) as much as practicable.	<ul style="list-style-type: none"> EDL monthly reports, dated January 2018 to March 2021 Notice of Variation of Licence No. 5065, dated 10 September 2019 Pollution Reduction Program Review Report, Northstar Air Quality, June 2020 Interviews with SUEZ site personnel 	<p>The gas infrastructure within the landfill is operational at all times, less those wells which are offline for maintenance reasons or decommissioned due to low or no extraction being achieved. This information is recorded in the EDL monthly report. Refer to condition C5(c) for a discussion of the operation and extension of the gas collection system within the stripped back prepared surface.</p> <p>Pollution Reduction Program Condition U1.7, triggered by odour complaints in 2018, requires SUEZ to speed up the process of installing landfill gas infrastructure. SUEZ explained to the auditors that they previously installed capping followed by gas wells and have updated their procedures to now install gas wells first.</p>	Compliant
Operating Conditions				
C25	Accumulated sludge and sediment formed during leachate storage at the site shall be disposed of to a special waste area at the LHRRP, separate from the active tip face.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel Landfill Daily Checklist dated 6, 7 and 8 November 2018 	The main leachate dam had its liner replaced in late 2018 early 2019. As part of these works, the leachate dam was emptied, de-sludged and a new liner installed. Sludge removed from leachate dams was disposed of in a trench located at the toe of the active tip face, away from tipping activity and covered immediately by general waste.	Compliant
C26	The Applicant shall manage all water that comes into contact with waste at the GO Facility as leachate. Leachate generated at the GO Facility may only be reused in the composting process on site or disposed to sewer in accordance with a Trade Waste Agreement or as otherwise agreed in writing with the EPA.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel EPL 12588 SUEZ Spring Farm, dated 22 February 2021 	<p>Surface water that runs off the existing GO Facility is collected in the GO Facility leachate pond. The GO EPL allows for waste liquor that has been appropriately aerated to be irrigated over the compost windrows. SUEZ reported that this was being undertaken. The aerators were observed in operation in the leachate pond during the audit site inspection. The site inspection also noted that there is a risk that if the GO Facility leachate pond overtops it could enter the stormwater system. SUEZ reported that it manages this risk by monitoring the level within the pond and trucking excess leachate to the SUEZ Spring Farm Resource Recovery Park which is licensed to receive leachate from other SUEZ facilities. It is noted this risk will be removed with the construction of the new GO Facility.</p> <p>Leachate from the existing GO facility was not disposed to sewer under a Trade Waste Agreement. The EPL allows for leachate to be disposed of lawfully off the premises.</p>	<p>Compliant</p> <p>2021 IEA OFI 04 – Review the risk of leachate overtopping the GO Facility leachate pond and entering the stormwater system and implement additional controls as required.</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
C27	All leachate generated at the ARRT Facility must be stored indoors or in enclosed tanks and used in the ARRT composting process or transferred for disposal to a Facility lawfully permitted to receive it.		Not triggered during the audit period. ARRT Facility yet to be constructed.	Not triggered
Leachate Monitoring				
C28	The Applicant shall routinely monitor leachate volumes from all sources and re-calibrate the leachate model included in the EIS, to ensure adequate storage, treatment and disposal capacity is maintained at all times. The Applicant shall report the results of on-going monitoring and model calibration every year in the Annual Review required under Condition D7.	<ul style="list-style-type: none"> Leachate inventory status report for April 2020 to March 2021 Leachate calibration model 2018, dated 30 November 2018 Leachate calibration model 2020, dated 19 February 2021 2020 AEMR, dated February 2021 	Real-time monitoring of leachate volumes was conducted using a SCADA system. This was demonstrated to the auditors during the audit site inspection. In addition, the Leachate Inventory Status Report (Excel workbook) was being updated on a monthly basis. The report includes a summary of the leachate generation (m ³ /day) and available leachate storage capacity in each of the leachate dams. Calibration of the leachate model was carried out by GHD in 2018 and 2020 and incorporated into the Annual Environmental Management Reports.	Compliant
C29	The Applicant shall implement any recommended measures identified by leachate model calibrations to maintain adequate storage, treatment and disposal capacity for the LHRRP at all times.	<ul style="list-style-type: none"> Leachate Water Balance Calibration, dated 30 November 2018 Leachate Water Balance Calibration, dated 19 February 2021 	The leachate water balance was calibrated in 2018 and in 2020. In 2019 SUEZ increased the treatment capacity of the Leachate Treatment Plant at LH1 as recommended by the EIS from 600 kL/day to 900 kL/day with the addition of an extra reactor. The 2020 Leachate Calibration Report factored in the new treatment capacity in its model. The 2020 Leachate Calibration Report states that the calibration indicates that the leachate water balance models are providing a fair prediction of the volumes of leachate being generated from various sources. The results of the calibration do not indicate that any changes are required to the site's existing practices or leachate management systems. The Report recommended that the leachate model be reviewed at a frequency of at least every five years.	Compliant
SURFACE WATER & GROUNDWATER Discharge Limits				
C30	The Development shall comply with Section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	<ul style="list-style-type: none"> Water analysis results, Eurofins dated 13 October 2020 (results received 6 October 2020) Letter to EPA dated 8 October 2020 providing incident report Letter to DPIE dated 14 October 2020 providing written details of incident Email to EPA dated 19 October 2020 providing water quality results 	<p>EPL 5065 authorises the discharge to waters at Mill Creek (EPA Point 1) from the site's sediment pond provided the conductivity, dissolved oxygen, nitrogen (ammonia), pH, phenol and total suspended solids levels meet the concentration criteria specified in the EPL.</p> <p>During the audit period, SUEZ was generally compliant with this condition however one incident was recorded which resulted in an unlicensed discharge of leachate to Mill Creek.</p> <p>On 30 September 2020, leachate was found overflowing from a leachate riser due to blockage of the drainage pipe. The leachate entered the stormwater system and subsequently Mill Creek. SUEZ estimated that approximately 10m³ of leachate entered the surface water drains. SUEZ reported that it installed a temporary pump into the creek to pump the leachate contaminated water from the creek to the groundwater storage tanks prior to discharge and treatment via the LH1 leachate treatment plant.</p> <p>The written report to the EPA and DPIE stated that the following remedial actions were implemented:</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<ul style="list-style-type: none"> Installation of a surface water bund to divert all surface water around the leachate riser to the surface water holding dam within the site Construction of vehicular access to the leachate riser <p>The letter also stated that SUEZ intends on replacing and upgrading the ring main of the riser which caused the incident. This was progressively undertaken with the construction of the new dual gas leachate trench. At the time of the audit site inspection the trench had been installed in Areas B, D and A.</p> <p>Surface water samples were collected from the following locations on 1 October 2020 and sent to Eurofins laboratory for testing:</p> <ul style="list-style-type: none"> EPA Point 21 – Discharge Point from stormwater treatment plant EPA Point 1 – Discharge point at Mill Creek EPA Point 23 – Main Sediment Dam (collected on 30 September 2020) MC3- Mill Creek downstream of EPA Point 1. <p>The results of the monitoring indicated the concentration limits of the EPL had been achieved. Ammonia levels of 1.6 mg/L were recorded at Point 1 which is below the EPL limit of 2.5 mg/L. It is noted that the samples were taken the day after the incident. Whether the ammonia limits would have been met at the time of the incident is not known. The water quality monitoring results were provided to the EPA by email dated 19 October 2020. SUEZ advised that no response was provided from the EPA following submission of the results.</p> <p>The release of leachate into Mill Creek is not authorised by the EPL however the auditors could not verify whether this release resulted in pollution of waters as monitoring was not undertaken until the following day. As stated above, the EPA was notified of the incident and no further action was taken.</p> <p>On the basis that SUEZ was generally compliant with this requirement (other than the leachate incident on the 30 September 2020 which could not be verified), this condition has been assessed as compliant.</p>	
GO Facility				
C31	The Applicant shall ensure excess water collected in the leachate dams at the GO Facility during high rainfall periods is transported off-site and disposed of lawfully or discharged to sewer in accordance with a Trade Waste Agreement.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel EPL 12588 SUEZ Spring Farm, dated 22 February 2021 	<p>Excess water collected in the existing GO Facility leachate pond during high rainfall periods is trucked to the SUEZ Spring Farm Resource Recovery Park.</p> <p>The SUEZ Spring Farm Resource Recovery Park is licenced to receive leachate from other SUEZ's licensed waste facilities.</p> <p>Leachate from the existing GO facility was not disposed to sewer under a Trade Waste Agreement.</p>	Compliant
C32	The Applicant shall prepare and submit a detailed design for managing surface water from roofs and breathable membrane covers at the GO Facility. The design shall: (a) be approved by the EPA prior to the commencement of operation of the GO Facility; (b) demonstrate that surface water runoff from the roof and breathable membrane covers does not come into contact with waste; and (c) describe a program for on-going monitoring of the water quality discharged from the GO Facility to Mill Creek.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel 	<p>Detailed design for the new GO Facility was still being prepared at the time of the audit and had not been submitted.</p> <p>SUEZ advised that a change in the GO process would be proposed and that a new Modification was also being prepared for submission.</p>	Not triggered

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
Mill Creek				
C33	The Applicant shall prepare an Aquatic Habitat Monitoring Plan to monitor the stream health of Mill Creek within the site. The plan shall: (a) be prepared by a suitably qualified and experienced person in consultation with DPI Water; (b) be submitted to the Secretary prior to construction of the GO Facility and updated and re-submitted to the Secretary prior to construction of the ARRT Facility; (c) describe the monitoring locations, frequency and parameters to be measured; and (d) detail the measures to be implemented if monitoring indicates the habitat quality of Mill Creek is decreasing as a result of activities on the site.	<ul style="list-style-type: none"> • AHMP, GHD, dated April 2021 • DPIE submission notice, dated 3 March 2021 	An Aquatic Habitat Management Plan (AHMP) has been prepared for the new GO Facility. The AHMP: (a) was prepared by a Senior Environmental Scientist – Aquatic Ecology with over 9 years' experience and includes DPI Water consultation in Appendix A (b) was submitted to the Department on 3 March 2021, ahead of construction of the new GO Facility, which has not commenced. At the time of this audit, this plan had not been approved by the Department (c) describes the monitoring locations, frequency and parameters to be measured in Section 4 (d) includes mitigation measures to be implemented if monitoring indicates that the habitat quality of Mill Creek is decreasing as a result of activities on the site in Section 5.	Compliant
C34	The Applicant shall prepare a Mill Creek Stream Rehabilitation, Stabilisation and Vegetation Management Plan. The plan shall: (a) be prepared by a suitably qualified and experienced person in consultation with DPI Water; (b) be submitted to the Secretary prior to construction of the GO and ARRT facilities; (c) be prepared in accordance with DPI Water <i>Guidelines for Controlled Activities on Waterfront Land</i> ; (d) detail proposed stream realignment works including details of the measures to minimise water quality impacts; (e) detail the proposed rehabilitation and stabilisation of the stream including methods and staging of works; (f) detail opportunities to maximise the width of riparian zones, particularly in the final landform design, and detail the vegetation types, maintenance, monitoring and performance criteria for the rehabilitation works; and (g) be updated to include any changes to the rehabilitation objectives and staging approved in the Post Closure Plan for the site, required under Condition C40.	<ul style="list-style-type: none"> • Mill Creek SRSVMP, GHD, dated April 2021 • DPIE submission notice, dated 3 March 2021 	Mill Creek Stream Rehabilitation, Stabilisation and Vegetation Management Plan (SRSVMP) has been prepared for the new GO Facility. The Mill Creek SRSVMP: (a) was prepared by a Senior Water Resources Engineer with over 10 years' experience and includes DPI Water consultation in Appendix A (b) was submitted to the Department on 3 March 2021, ahead of construction of the new GO Facility, which has not commenced. At the time of this audit, this plan had not been approved by the Department (c) was prepared in accordance with DPI Water <i>Guidelines for Controlled Activities on Waterfront Land</i> as stated in Section 5 (d) details proposed stream realignment works, including details of the measures to minimise water quality impacts, in Section 4 (e) details the proposed rehabilitation and stabilisation of the stream including methods and staging of work in Section 4.5 (f) details opportunities to maximise the width of riparian zones, particularly in the final landform design, and detail the vegetation types, maintenance, monitoring and performance criteria for the rehabilitation works in Sections 4.5 and 4.6	Compliant
Groundwater Management Plan				
C35	The Applicant shall prepare a Groundwater Management Plan for the site. The plan must: (a) be prepared by a suitably qualified and experienced person, in consultation with the EPA and DPI Water; (b) be submitted to the Secretary, prior to the commencement of construction; (c) detail the groundwater monitoring network including location and frequency of monitoring, the parameters for testing, relevant criteria and trigger levels for action; (d) include a protocol for investigation, notification and mitigation of any exceedances of the identified trigger levels; and (e) describe the measures that could be implemented to respond to identified groundwater contamination.	<ul style="list-style-type: none"> • GMP, dated 31 January 2018 • Letter from Beatty Legal to SUEZ – Licensing Requirements under the Water Management Act 2000 for Groundwater Inflows at LHRRP, dated 22 October 2019 • NRAR response, email dated 11 March 2020 	<p>The Groundwater Management was prepared during the previous audit period and submitted to the Department in January 2018. An assessment of whether the Plan addressed the requirements of this condition was presented in the 2018 IEA.</p> <p>The auditors note that the GMP has not yet been accepted by the Department as there is a disagreement over whether a licence is required for groundwater extraction.</p> <p>Beatty Legal were appointed to advise SUEZ on the approval requirements under for the groundwater inflows associated with the waste cell liner depressurisation system described in Section 4.3.2 of the GMP. They concluded that:</p> <ul style="list-style-type: none"> • There is no requirement for a Water Access Licence (WAL) as “Under the WM Act a WAL entitles the holder to shares in available water and to “take” water at specified times, at 	<p>Compliant</p> <p>2021-IEA REC 09 - Resolve issue over requirement for a Water Access Licence and obtain DPIE approval of GMP.</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p><i>specified rates and/or in specified circumstances and in specified areas or from specified locations (s56). It is an offence to “take “ water from a water source regulated by a water sharing plan (WSP) without a WAL (see e.g. s60A)... Any groundwater inflow is passive, indirect, predicted to be of a small (and diminishing) volume and of an unmeasurable volume”.</i></p> <p>DPI Water (formerly Natural Resources Access Regulator, NRAR) response to the advice provided by Beaty Legal/SUEZ stated that they had not been able to identify any exemptions from requiring a WAL for the proposed water take for this project, therefore the project will need to obtain the relevant WAL.</p> <p>On the basis that the Groundwater Management Plan has been prepared and submitted to DPIE this condition has been assessed as compliant.</p>	
Groundwater Monitoring				
C36	The Applicant shall re-establish historic groundwater monitoring bores (BH24, BH31, MB021 and MB022) to improve detection of leachate in groundwater systems to the north of the site. The Applicant shall monitor groundwater from these bores in accordance with the requirements of an EPL for the site and the groundwater management plan required under Condition C35.	<ul style="list-style-type: none"> • GMP, dated 31 January 2018 • Notice of Variation of Licence No. 5065, dated 27 November 2018 • Interviews with SUEZ site personnel 	<p>Section 5.1 of the GMP provides an assessment of the requirement to re-install BH24, BH31, MB021 and MB022. Douglas Partners recommends that BH24, BH31, MB021, MB022 are not re-instated. They have identified a gap in monitoring on the western site boundary, south of points MB305 and MB306, and therefore recommend installation of two bores in this area, prior to the commencement of operations at the GO Facility and ARRT Facility.</p> <p>As assessed during the previous IEA, DPI Water also made the following recommendations:</p> <ul style="list-style-type: none"> • Refurbishment of MB022 • An additional monitoring bore is strongly recommended to be installed approximately positioned 100 to 120 metres north-northwest of bores MB038 –MB039. This new monitoring bore site is considered by DPI Water as an alternative to re-establishing the three northern bores (BH31, MB021 and BH24) referred to in C36 • Installation of this new nested monitoring bore site is strongly recommended by DPI Water and is proposed to be included as part of the ongoing development of the monitoring network and the landfill site. This additional monitoring bore is to be a nested bore, including two screens, a shallow screen and a deeper screen of similar depth to MB022. <p>SUEZ acknowledged the last two recommendations and installed two new monitoring wells (MB048 and MB049) in December 2017. The GMP identifies that MB022 will not be reinstated.</p> <p>The two new monitoring bores (MB048 and MB049) were added to the EPL in the November 2018 and MB022 was removed.</p> <p>The auditors have assessed this as non-compliant on the basis that historic groundwater monitoring bores have not been re-</p>	<p>Non-compliant</p> <p>2021 IEA REC 15 – Obtain DPIE approval of alternative bore locations</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p>established as required by this condition and the alternative locations have not been approved by DPIE.</p> <p>The auditors do however note that SUEZ plans to incorporate the amended bore locations in the future consent modification (MOD2), which is awaiting submission.</p>	
Bunding				
C37	The Applicant shall store all chemicals, fuels and oils used on the site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or the EPA's <i>Storing and Handling of Liquids: Environmental Protection - Participants Handbook</i> .	<ul style="list-style-type: none"> Audit site inspection 	<p>The following fuel tanks and chemicals were stored on site at the time of the site inspection:</p> <ul style="list-style-type: none"> 60,000 L diesel tank used for refuelling collection vehicles in the Truck Parking Area (TPA) an aboveground double-skinned self-bunded 60,000 L diesel tank in the Select Civil workshop area Waste oils in two 2,000 L tanks in the Select Civil workshop area in a concrete bund Oils and coolants in intermediate bulk containers (IBCs), 205 L drums and 20 L containers in the Select Civil workshop stored on single IBC bunded spill pallets In-ground waste oil pit associated with oil water separator in the Select Civil workshop area. Waste oil from the separator is stored in a 20 L plastic container. Select Civil reported that minimal separated oil is generated. Waste oil is collected by Southern Oil Collections for off-site recycling Dangerous Goods (DG) Class 3 (Flammable Liquids) including paints and thinners, stored in a Flammable Goods cabinet. <p>Domestic quantities of waste were stored in the hazardous waste receipt area prior to collection for off-site treatment. Materials include waste oils, waste paints and batteries. These were stored in an undercover, bunded area.</p> <p>Select Civil is responsible for maintaining the Workshop area. Select Civil has its own management systems and procedures for the storage of chemicals, fuels and oils including SC-WHS-005 <i>Storage & Handling of Hazardous Materials</i>.</p> <p>During the audit site inspection, the auditors noted that bunded areas within the Select Civil workshop did not appear to be adequate for the volume of liquids being stored. The auditors noted that risk of surface water contamination was reduced because the workshop area drains to a lined basin which is reportedly pumped to the leachate treatment plant. However the requirement to store liquids in appropriately bunded areas still applies.</p> <p>Refer to main report, Section 6.0 for photos and recommendations relating to liquid storage and bund maintenance.</p>	<p>Non-compliant</p> <p>2021 IEA REC 04 – Review liquid storage at the Select Civil Workshop area and ensure adequate bunding is provided</p>
FINAL LANDFORM, REHABILITATION & CLOSURE				
Final Landform				
C38	The Applicant shall rehabilitate the site to achieve the final landform shown in Appendix C, in accordance with the criteria in the EPA's <i>Environmental Guidelines: Solid Waste Landfills, 2016</i> , or its latest version.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel 	Not triggered during the audit period	Not triggered
C39	The Applicant shall ensure the height of the final landform does not exceed 179.9 metres Australian Height Datum (AHO) post-settlement of the waste mass and final capping, as described in the EIS.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel 	Not triggered during the audit period	Not triggered

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
Post-Closure Plan				
C40	The Applicant shall amend the draft Post-Closure Plan for the site, to the satisfaction of the Secretary. The plan shall: (a) be prepared by a suitably qualified and experienced person; (b) be submitted to the EPA and the Secretary 12 months prior to the planned closure of the landfill, GO and ARRT Facilities on the site; (c) be approved by the EPA, Council, ANSTO and the Secretary, prior to commencement of the final phase of landfill capping and rehabilitation works; (d) detail the requirements for on-going management of the capped waste mass; (e) describe monitoring and management measures to ensure integrity of the cap; (f) describe on-going leachate and surface water management, odour and dust control; (g) detail landfill gas monitoring and maintenance; (h) identify future land uses on the site, developed in consultation with Council, ANSTO, the Cronulla Model Aero Club and local recreational and sporting groups; (i) include a rehabilitation management plan, including, but not limited to: i) rehabilitation works as generally depicted in Appendix C; ii) criteria for evaluating the effectiveness of the rehabilitation; iii) a program and schedule to monitor the effectiveness of the rehabilitation; iv) a program and schedule for routine maintenance of the rehabilitation; v) any remedial actions necessary to ensure the success of the rehabilitation; vi) a weed management plan; and j) incorporate the post closure requirements detailed in the VPA.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel 	Not triggered during the audit period	Not triggered
VISUAL AMENITY				
C41	The Applicant shall undertake screen planting as shown on the plan in Appendix D to minimise the visual impacts of the Development. The planting shall be completed by January 2025, subject to agreement with ANSTO for works on ANSTO's land. Evidence of implementation of the planting shall be provided to the satisfaction of the Secretary, within one month of completing the planting.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel 	Not triggered during the audit period	Not triggered
C42	The Applicant shall progressively hydro-mulch and grass completed landfill areas to minimise the visual impacts of the Development.	<ul style="list-style-type: none"> Audit site inspection 	During the audit site inspection, the auditors observed that capping on Areas D and E had been hydro-mulched and grass had established	Compliant
C42A	The Applicant must ensure any lighting associated with the operation of the landfill: (a) complies with the latest version of AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting; and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	<ul style="list-style-type: none"> Liteman Super LED specification, provided by Select Civil 2018, 2019 & 2020 AEMRs Interviews with SUEZ site personnel 	<p>A mobile light tower was installed at tip face by Select Civil following the approval of MOD 1 to illuminate the landfill during the earlier hours of operation.</p> <p>(a) A review of the lighting installation against AS 4282 (INT) was carried out by Select Civil General Manager. The review concluded that the lighting is in compliance with the Standard</p> <p>(b) SUEZ reported that no complaints relating to outdoor lighting were received during the audit period</p>	Compliant
BIODIVERSITY Construction				
C43	The Applicant shall prepare a Vegetation and Fauna Management Plan to minimise impacts on biodiversity during construction of the GO and ARRT facilities, to the satisfaction of the Secretary. The plan shall: (a) be prepared by a suitably qualified and experienced ecologist; (b) be submitted to the Secretary, prior to the commencement of construction of the GO and/or ARRT Facility, whichever is sooner; (c) include a vegetation clearing protocol and pre-clearance surveys; (d) detail specific procedures for protecting native vegetation, including the <i>Coastal Upland Swamp</i> , and fauna adjacent to construction areas, including the access track near the GO Facility, the sediment pond north of the ARRT Facility and the verge adjacent to Heathcote Road; (e) detail erosion and sediment controls and weed management procedures; and (f) include procedures for seed collection and translocation of key species, including <i>Allocasuarina diminuta</i> subsp. <i>Mimica</i> and <i>Acacia bynoeana</i> .	<ul style="list-style-type: none"> Go Facility CEMP, GHD, dated April 2021 DPIE submission notice, dated 8 April 2021 	<p>A Vegetation and Fauna Management Plan (VFMP) for the GO Facility was included as Appendix D of the GO Facility Construction Environmental Management Plan (CEMP).</p> <p>(a) The VFMP was prepared by a Senior Ecologist with over 14 years' experience and a Technical Director Biodiversity with over 25 years' experience and includes a table (Table 1-1) outlining where the requirements of Condition C43 have been addressed.</p> <p>(b) The CEMP was submitted to the Department on 8 April 2021, ahead of construction of the GO Facility, which has not commenced. At the time of this audit, this plan had not been approved by the Department.</p> <p>(c) Vegetation clearing protocol and pre-clearance surveys are included in Sections 3 and 4</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation																
			(d) Details of specific procedures for protecting native vegetation, including the <i>Coastal Upland Swamp</i> , and fauna adjacent to construction areas, including the access track near the GO Facility, the sediment pond north of the ARRT Facility and the verge adjacent to Heathcote Road are included in Sections 3 and 4 (e) Details of erosion and sediment controls and weed management procedures are included in Sections 4.3 and 4.4.3 (f) Procedures for seed collection and translocation of key species, including <i>Allocasuarina diminuta subsp. Mimica</i> and <i>Acacia bynoeana</i> are included in Section 3.3.																	
C44	The Applicant shall appoint a qualified and experienced ecologist to be present on site during native vegetation clearing for construction of the GO and ARRT facilities and realignment of Mill Creek.	<ul style="list-style-type: none">Interviews with SUEZ site personnel	Not triggered during the audit period	Not triggered																
Biodiversity Offset Strategy																				
C45	<p>The Applicant shall purchase and retire the ecosystem and species credits listed in Table 1, in accordance with OEH's <i>Frameworks for Biodiversity Assessment 2014</i> and the <i>NSW Biodiversity Offsets Policy for Major Projects 2014</i>, to the satisfaction of the Secretary. The credits shall be purchased and retired prior to construction of the relevant facility listed in Table 1.</p> <p>Table 1: Biodiversity Offset Strategy</p> <table><tr><th>Facility</th><th>No. of Credits</th><th>Offset Type</th></tr><tr><td>GO Facility</td><td>185 ecosystem</td><td>Red Bloodwood – Scribbly Gum Healthy woodland on sandstone plateaux</td></tr><tr><td rowspan="3">ARRT Facility</td><td>97 species</td><td>Eastern Pygmy-possum</td></tr><tr><td>143 ecosystem</td><td>Red Bloodwood – Scribbly Gum Healthy woodland on sandstone plateaux</td></tr><tr><td>88 species</td><td>Eastern Pygmy-possum</td></tr><tr><td></td><td>5154 species</td><td><i>Allocasuarina diminuta subsp. Mimica</i></td></tr></table> <p><i>Note: The areas referred to in Table 1 are shown on the figures in Appendix A.</i></p>	Facility	No. of Credits	Offset Type	GO Facility	185 ecosystem	Red Bloodwood – Scribbly Gum Healthy woodland on sandstone plateaux	ARRT Facility	97 species	Eastern Pygmy-possum	143 ecosystem	Red Bloodwood – Scribbly Gum Healthy woodland on sandstone plateaux	88 species	Eastern Pygmy-possum		5154 species	<i>Allocasuarina diminuta subsp. Mimica</i>	<ul style="list-style-type: none">Interviews with SUEZ site personnel	Not triggered during the audit period.	Not triggered
Facility	No. of Credits	Offset Type																		
GO Facility	185 ecosystem	Red Bloodwood – Scribbly Gum Healthy woodland on sandstone plateaux																		
ARRT Facility	97 species	Eastern Pygmy-possum																		
	143 ecosystem	Red Bloodwood – Scribbly Gum Healthy woodland on sandstone plateaux																		
	88 species	Eastern Pygmy-possum																		
	5154 species	<i>Allocasuarina diminuta subsp. Mimica</i>																		
C46	The Applicant shall not commence construction of a facility listed in Table 1, until the Biodiversity Offset Strategy for that facility has been implemented, to the satisfaction of the Secretary.	<ul style="list-style-type: none">Interviews with SUEZ site personnel	Not triggered during the audit period	Not triggered																
C47	The Applicant shall ensure the biodiversity offsets are secured by a conservation mechanism, which protects and manages the land in perpetuity, to the satisfaction of the Secretary.	<ul style="list-style-type: none">Interviews with SUEZ site personnel	Not triggered during the audit period	Not triggered																
TRANSPORT AND ACCESS																				
Construction Traffic Management Plan																				
C48	<p>The Applicant shall prepare a Construction Traffic Management Plan for construction of the GO and ARRT facilities. The plan shall:</p> <p>(a) be prepared by a suitably qualified and experienced expert, in consultation with Council and RMS;</p> <p>(b) be submitted to the Secretary, prior to the commencement of construction of the GO and/or ARRT Facility;</p> <p>(c) detail the measures to be implemented to ensure road safety and network efficiency during construction;</p> <p>(d) detail heavy vehicle routes, access and parking arrangements;</p> <p>(e) include a Driver Code of Conduct to:</p> <ul style="list-style-type: none">minimise the impacts of construction works on the local and regional road network;minimise conflicts with other road users;ensure truck drivers use specified routes;	<ul style="list-style-type: none">Go Facility CEMP, GHD, dated April 2021DPIE submission notice, dated 08 April 2021	<p>A Construction Traffic Management Plan (CTMP) for the GO Facility was included as Appendix E of the GO Facility Construction Environmental Management Plan (CEMP).</p> <p>The auditors note that this plan does not include a Driver Code of Conduct, program to monitor the effectiveness of proposed measures and procedures for notifying residents and the community of any potential disruption routes as required by Condition C48. The plan will also require updating to reflect that consultation with SSC and Transport for NSW (formerly RMS) occurred. It is recommended the CTMP is updated and resubmitted to the Department prior to commencement of construction of the GO Facility.</p>	Not triggered																

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
	(f) include a program to monitor the effectiveness of these measures; and (g) if necessary, detail procedures for notifying residents and the community, of any potential disruptions to routes.		Refer to 2021 IEA REC 11 in main report	
Intersection Safety Review				
C49	The Applicant shall conduct a safety review of the Little Forest Road and New Illawarra Road intersection in the years 2020 and 2025 to ensure the on-going safe and efficient performance of the intersection. The safety reviews shall be prepared to the satisfaction of the Secretary and shall: (a) be prepared by an independent traffic expert; (b) be undertaken in consultation with Council and RMS and in accordance with relevant guidelines; (c) be approved by the Secretary and RMS, by the end of 2020 and 2025; (d) analyse vehicle movements and delays during peak periods; (e) establish intersection performance and the need for any intersection upgrade works; and (f) include a program for implementation of intersection upgrade works, if required.	<ul style="list-style-type: none"> Intersection Safety Review, GHD, dated January 2021 DPIE letter of approval, dated 17 February 2021 	<p>The LHRRP Intersection Safety Review for 2020 was conducted by GHD in consultation with SSC and TfNSW (formerly RMS).</p> <p>The auditors note that TfNSW consultation recorded that TfNSW had provided a remark of "no further comments or objections to this report".</p> <p>The Intersection Safety Review was approved by the Department on 17 February 2021, outside the required timeframe. TfNSW approval (as required by (c) was not obtained.</p> <p>The report did not recommend any future upgrade of the intersection. Further study was recommended to be carried out in 2025. On the basis that TfNSW (RMS) approval was not obtained and that the timeframe for Secretary approval was not met, this condition has been assessed as non-compliant</p>	<p>Non-compliant</p> <p>2021 IEA REC 16 – Request TfNSW (RMS) approval of the Intersection Safety Review for 2020</p>
C50	The Applicant shall implement the recommendations of the safety reviews, including any required intersection upgrades, to the satisfaction of the Secretary and RMS. The timing and payment for implementation of any required intersection upgrades shall be agreed with the Secretary and RMS.	<ul style="list-style-type: none"> Intersection Safety Review, GHD, dated January 2021 	The Intersection Safety Review did not recommend any upgrades to the Little Forest Road and New Illawarra Road intersection. Therefore, this requirement was not triggered.	Not triggered
Operating Conditions				
C51	The Applicant shall ensure: (a) all staff vehicles, plant and equipment are parked on site and do not park on the public road network; (b) all loading and unloading of materials is carried out on site; (c) all trucks entering or leaving the site with loads have their loads covered; (d) vehicles do not track dirt onto the public road network; and (e) heavy vehicles use designated routes to minimise impacts on the local and regional road network.	<ul style="list-style-type: none"> Audit site inspection Interviews with SUEZ site personnel 	<p>(a) During the audit site inspection, no parked vehicles, plant or equipment was sighted on the public road network</p> <p>(b) The site has a weighbridge which directs vehicles to the appropriate areas for unloading. No dumped rubbish was sighted by the auditors</p> <p>(c) The auditors did not identify any uncovered loads during the audit site inspection</p> <p>(d) the wheel wash was observed to be operational and used by trucks during the audit site inspection which was on a wet day. The vehicle wheel wash is open every day. During wet weather conditions all vehicles which access the tip face must use the wheel wash. During dry conditions the wheel wash is optional.</p> <p>(e) SUEZ implemented the following measures for heavy vehicles:</p> <ul style="list-style-type: none"> - SUEZ has Heavy Vehicle PBS Authorisation permit for a number of its trucks (quad-axle mostly used to transport waste from transfer stations) which specifies which designated routes they can use. - SUEZ sub-contractors toolbox drivers on designated routes. - SUEZ trucks are fitted with GPS monitoring. If a vehicle deviates from the designated route an alert is sent to the head office. - Site Traffic Management Plan was updated on 22 April 2020 to amend the location of the tip face. No changes to site operation were required. 	Compliant
Parking				
C52	The Applicant shall provide sufficient parking facilities for site personnel and heavy vehicles on the site, to ensure traffic associated with the site does not utilise public and residential streets or public parking facilities.	<ul style="list-style-type: none"> Audit site inspection 	Site observations indicated that parking facilities are sufficient for the workforce and heavy vehicles.	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation																																										
NOISE																																														
Hours of Work																																														
C53	<p>The Applicant shall comply with the hours detailed in Table 2, unless otherwise agreed in writing by the EPA or the Secretary.</p> <p>Table 2: Hours of Work</p> <table><tr><th>Facility</th><th>Activity</th><th>Day</th><th>Time</th></tr><tr><td rowspan="4">Landfill</td><td rowspan="2">Construction</td><td>Monday - Friday</td><td>7 am – 5pm</td></tr><tr><td>Saturday - Sunday</td><td>8 am – 5pm</td></tr><tr><td rowspan="2">Operation</td><td>Monday - Friday</td><td>5 am – 5pm</td></tr><tr><td>Saturday</td><td>6 am – 5pm</td></tr><tr><td rowspan="4">GO Facility</td><td rowspan="2">Other operations¹</td><td>Sunday</td><td>8am – 5pm</td></tr><tr><td>Monday - Sunday</td><td>Anytime</td></tr><tr><td rowspan="2">Construction</td><td>Monday - Friday</td><td>7 am – 5pm</td></tr><tr><td>Saturday - Sunday</td><td>8 am – 5pm</td></tr><tr><td rowspan="4">ARRT Facility</td><td rowspan="2">Operation</td><td>Monday - Friday</td><td>6 am – 5pm</td></tr><tr><td>Saturday - Sunday</td><td>8 am – 5pm</td></tr><tr><td rowspan="2">Other operations²</td><td>Monday - Sunday</td><td>Anytime</td></tr><tr><td>Construction</td><td>Monday - Friday</td><td>7 am – 5 pm</td></tr><tr><td>Saturday - Sunday</td><td>8am -5 pm</td></tr><tr><td>Monday - Sunday</td><td>Anytime</td></tr></table> <p>Notes:</p> <p>1 Other landfilling operations includes only security guard control, machinery maintenance and/or repairs, site infrastructure maintenance and/or repairs (landfill gas and leachate), and emergency management activities related to site safety, emergency repairs and site infrastructure repairs</p> <p>2 Other GO operations includes only repair works, machinery maintenance and repairs, loading bunkers, final product preparation manufacture (but does not include shredding) and emergency management activities related to site safety, emergency repairs and site infrastructure repairs. Unloading bunkers is only permitted between the hours of operations listed under 'GO Facility - Operation' in Table 2.</p>	Facility	Activity	Day	Time	Landfill	Construction	Monday - Friday	7 am – 5pm	Saturday - Sunday	8 am – 5pm	Operation	Monday - Friday	5 am – 5pm	Saturday	6 am – 5pm	GO Facility	Other operations ¹	Sunday	8am – 5pm	Monday - Sunday	Anytime	Construction	Monday - Friday	7 am – 5pm	Saturday - Sunday	8 am – 5pm	ARRT Facility	Operation	Monday - Friday	6 am – 5pm	Saturday - Sunday	8 am – 5pm	Other operations ²	Monday - Sunday	Anytime	Construction	Monday - Friday	7 am – 5 pm	Saturday - Sunday	8am -5 pm	Monday - Sunday	Anytime	<ul style="list-style-type: none">Interviews with site personnelSample of Excel extracts of weighbridge data (January – June 2019, July - December 2019, March 2020)	<p>Since MOD 1 was approved in June 2018, the site has operated from 5am Monday to Friday. This has reduced truck queuing on Little Forest Road. The site is operated from 8am to 4pm on Saturdays and Sundays. This was confirmed by reviewing the weighbridge data which includes the ‘Time In’ and ‘Time Out’.</p> <p>The GO Facility and ARRT Facility were not constructed at the time of the audit.</p>	Compliant
Facility	Activity	Day	Time																																											
Landfill	Construction	Monday - Friday	7 am – 5pm																																											
		Saturday - Sunday	8 am – 5pm																																											
	Operation	Monday - Friday	5 am – 5pm																																											
		Saturday	6 am – 5pm																																											
GO Facility	Other operations ¹	Sunday	8am – 5pm																																											
		Monday - Sunday	Anytime																																											
	Construction	Monday - Friday	7 am – 5pm																																											
		Saturday - Sunday	8 am – 5pm																																											
ARRT Facility	Operation	Monday - Friday	6 am – 5pm																																											
		Saturday - Sunday	8 am – 5pm																																											
	Other operations ²	Monday - Sunday	Anytime																																											
		Construction	Monday - Friday	7 am – 5 pm																																										
Saturday - Sunday	8am -5 pm																																													
Monday - Sunday	Anytime																																													
Operational Noise Limits																																														
C54	<p>C54. The Applicant shall ensure noise from the site does not exceed the noise limits in Table 3.</p> <p>Table 3: Noise Limits dB(A)</p> <table><tr><th>No.</th><th>Location</th><th>Day</th><th>Evening</th><th>Night</th><th>Night</th></tr><tr><td></td><td></td><td>Leq(15min)</td><td>Leq(15min)</td><td>Leq(15min)</td><td>Leq(1min)</td></tr><tr><td>R1</td><td>Engadine</td><td>35</td><td>35</td><td>35</td><td>45</td></tr><tr><td>R2</td><td>Barden Ridge</td><td>35</td><td>35</td><td>35</td><td>45</td></tr><tr><td>R3</td><td>Menai</td><td>35</td><td>35</td><td>35</td><td>45</td></tr><tr><td>R6</td><td>Gandangara</td><td>37</td><td>37</td><td>37</td><td>45</td></tr><tr><td>R7</td><td>Gandangara North</td><td>35</td><td>35</td><td>35</td><td>45</td></tr></table> <p>Note:</p> <ul style="list-style-type: none">To identify a noise receiver location, refer to the figure in Appendix E.Noise generated on the site is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the EPA's NSW Industrial Noise Policy.	No.	Location	Day	Evening	Night	Night			Leq(15min)	Leq(15min)	Leq(15min)	Leq(1min)	R1	Engadine	35	35	35	45	R2	Barden Ridge	35	35	35	45	R3	Menai	35	35	35	45	R6	Gandangara	37	37	37	45	R7	Gandangara North	35	35	35	45	<ul style="list-style-type: none">Annual Compliance Noise Monitoring Report, Wilkinson Murray, November 2018Annual Compliance Noise Monitoring Report, Wilkinson Murray, December 2019Annual Compliance Noise Monitoring Report, Wilkinson Murray, January 2021	<p>SUEZ commissioned annual noise assessments as required under Condition C56. The assessments found that Site complied with the noise limits provided in Table 3. Refer to condition C56 for further information.</p>	Compliant
No.	Location	Day	Evening	Night	Night																																									
		Leq(15min)	Leq(15min)	Leq(15min)	Leq(1min)																																									
R1	Engadine	35	35	35	45																																									
R2	Barden Ridge	35	35	35	45																																									
R3	Menai	35	35	35	45																																									
R6	Gandangara	37	37	37	45																																									
R7	Gandangara North	35	35	35	45																																									
Noise Management																																														
C55	<p>The Applicant shall implement the noise management measures described in the OEMPs for the LHRRP, GO and ARRT facilities to ensure noise from the site complies with the limits in Table 3.</p>	<ul style="list-style-type: none">Noise monitoring record sheets, dated 14 April 20212018, 2018 & 2020 AEMRs	<p>This condition has been assessed for the LHRRP. The GO Facility and ARRT Facility had not been constructed at the time of the audit.</p> <p>The OEMP for the LHRRP includes a number of preventative mitigation and rectification measures. These were observed to be generally undertaken at the site.</p>	Compliant																																										

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<p>In addition, a number of activities are required under the OEMP. The following observations are noted for each:</p> <ul style="list-style-type: none"> The site is inspected for excessive noise levels – daily. The auditors noted that the Landfill Daily Checklist includes a check of “noise (on and off-site)”. No further detail is provided on how this assessment is undertaken. Maintenance of machinery – as required. Maintenance of plant and equipment is discussed under condition B11. Checking machinery for excessive noise – quarterly. SUEZ reported that quarterly monitoring began in October 2017. Select Civil conduct the monitoring and record the results in a ‘Noise Monitoring Record Sheet’. SUEZ provided the auditors with a copy of the tests undertaken on 4 October 2020 and on 14 April 2021 for a D8 Dozer and an 836 Compactor. In each case both machines measured below 85dB. Recording noise complaints – on occurrence. No noise complaints were received during the audit period. Recording of noise volumes at strategic points across the site – as required. SUEZ provided the auditors with a copy of the noise monitoring results for monitoring undertaken at the Bike Club, Harrington’s Gate, Workshop, Tip Face and Boundary Fence. Noise monitoring was undertaken by the SUEZ EQS Officer on a quarterly basis. Section 8.8.4 of the OEMP includes performance indicators for noise monitoring. The auditors note that the performance criteria within the OEMP do not reflect the noise limits provided in Condition C54. The performance limits include the Site’s previous consent (DA 11-01-99). Therefore, this monitoring was not able to be interpreted by the auditors against the criteria provided in Table 3. <p>The previous IEA included a recommendation to update the OEMP to include an appropriate noise monitoring procedure. This was not undertaken and is considered to still be relevant. Refer to main report for recommendations relating to the OEMP.</p> <p>Based on the observations during the site inspection and no complaints being received related to noise during the audit period this condition is considered to be compliant.</p>	
Noise Monitoring				
C56	<p>The Applicant shall monitor noise from the site to demonstrate compliance with the noise limits in Table 3. The monitoring shall be:</p> <p>(a) undertaken annually, or to address genuine noise complaints that are related to the site as determined by the EPA or the Secretary;</p> <p>(b) in accordance with the <i>NSW Industrial Noise Policy</i>; and</p> <p>(c) reported to the EPA and the Secretary within one month of completing the monitoring, including details of management actions taken and the effectiveness of the actions to address any exceedances of the limits in Table 3.</p>	<ul style="list-style-type: none"> Annual Compliance Noise Monitoring Report, Wilkinson Murray, November 2018 Annual Compliance Noise Monitoring Report, Wilkinson Murray, December 2019 Annual Compliance Noise Monitoring Report, Wilkinson Murray, January 2021 	<p>(a) During the audit period the annual compliance noise monitoring was undertaken by Wilkinson Murray Pty Ltd. Monitoring was undertaken at the five receptors listed in Condition C54.</p> <p>The 2018 report found that “no noise from Site was audible at any time at locations R1, R2 R3 and R7. Noise from site was audible at times at location R6 however only when the sound power level (SPL) fell to around 30dBA. The estimated noise from the LHRRP therefore complies with the conditions (C54) at all locations”</p> <p>The 2019 and 2020 reports found that “no noise from the site was audible at any time at locations R1, R2, R3, R6 or R7,</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
		<ul style="list-style-type: none"> Submission emails to DPIE and EPA, dated 27 January 2021 Submission emails to DPIE and EPA, dated 9 January 2020 Submission emails to DPIE and EPA, dated 9 November 2018 	<p><i>the estimated noise from the LHRRP complies with the conditions at all locations.</i></p> <p>(b) Wilkinson Murray states in Section 1 of the reports, that the assessment was conducted in accordance with the <i>NSW EPA Industrial Noise Policy</i>.</p> <p>(c) In 2018, noise monitoring was undertaken on the 30 October 2018. The Annual Compliance Noise Monitoring report, dated November 2018, was submitted to both the Department and EPA via email dated 9 November 2018.</p> <p>In 2019, noise monitoring was undertaken on 5 December 2019. The Annual Compliance Noise Monitoring report, dated 11 December 2019, was submitted to both the Department and EPA via email dated 9 January 2020.</p> <p>In 2020, noise monitoring was undertaken on 17 December 2020. The Annual Compliance Noise Monitoring report, dated 19 January 2021, was submitted to both the Department and EPA via email dated 27 January 2021.</p>	
LITTER & PEST CONTROL				
C57	<p>The Applicant shall:</p> <p>(a) ensure all waste loads are covered;</p> <p>(b) inspect and clear the site (and if necessary, surrounding area) of litter arising from the Development on a daily basis; and</p> <p>(c) maintain the site in a clean and tidy state at all times.</p>	<ul style="list-style-type: none"> Landfill Daily Checklist dated 2 May 2021 Landfill Weekly Checklist dated 15 January 2021 VPA Quarterly Report October-December 2020 	<p>(a) The majority of waste trucks are enclosed bodies. The weighbridge has cameras installed to check that loads are covered upon entering and exiting the Site.</p> <p>(b) The Site undertook the following during the audit period:</p> <ul style="list-style-type: none"> Landfill Daily Checklist completed by Select Civil. The checklist includes notes on litter picking completed and whether litter fencing is in place. Landfill Weekly Checklist completed by SUEZ. The checklist includes inspection of litter screens, site boundary and identification of litter beyond the site boundary. Select Civil, under a requirement of the VPA, reportedly undertook quarterly litter patrols on New Illawarra Road up to the intersection of Heathcote Road and the conservation area. <p>(c) The Site entrance, public drop-off area and landfill areas were observed to generally be clean and tidy. Litter fences have been installed along the boundary of the active tipping face.</p>	Compliant
C58	<p>The Applicant shall:</p> <p>(a) implement measures to manage pests, vermin and declared noxious weeds on site; and</p> <p>(b) inspect the site routinely to ensure the measures are effective, and pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.</p> <p><i>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</i></p>	<ul style="list-style-type: none"> Service Visit Report, Rentokil, dated 14 April 2021 Letter from SSC, Control of Pest Species at Lucas Heights Conservation Area and SUEZ, dated 02 July 2020 SUEZ High Risk Weed Control Program, SSC, dated 18 November 2020 	<p>Section 8.9 of the LHRRP OEMP includes a management strategy for weeds, pest and vermin.</p> <p>SUEZ reported that it engaged a pest control contractor (Rentokil) to undertake monthly inspections of the Site, including LH1 once every two months. The auditors sighted a Rentokil Service Visit Report dated 14 April 2021 which reported that insecticide spray treatment had been applied and rodent baits placed.</p> <p>SUEZ participates in a co-operative control program for rabbits, cats, foxes, dogs and deer with SSC. The program is managed by SSC with SUEZ contributing financially and by providing access to the site. The auditors sighted a letter from SSC outlining the Council's pest control program dated 02 July 2020.</p> <p>SUEZ also participates in an integrated control program for noxious weeds with SSC, Crown Lands, Department of Defence</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			and ANSTO. An annual program is prepared identifying the weeds to be targeted, the program outline and treatment method. The program is administered by SSC with SUEZ contributing financially and allowing access to the site. The auditors sighted the Council's SUEZ High Risk Weed Control Program, dated 18 November 2020	
HERITAGE Unexpected Finds Protocol				
C59	If Aboriginal objects are uncovered during construction, work in the immediate area must stop and the Regional Operations Group of the OEH, Council and the Registered Aboriginal Parties are to be consulted.	• Interviews with SUEZ site personnel	No Aboriginal objects were reportedly uncovered during the audit period.	Not triggered
C60	If any archaeological relics are uncovered during the course of the work, then all works shall cease immediately in that area and the OEH Heritage Branch contacted. Depending on the possible significance of the relics, an archaeological assessment and an excavation permit under the <i>NSW Heritage Act 1977</i> may be required before further works can continue in that area.	• Interviews with SUEZ site personnel	No archaeological relics were reportedly uncovered during the audit period.	Not triggered
Site Impact Recording				
C61	Within one month of the date of this consent, the Applicant shall submit Site Impact Recording Forms to OEH for the four previously impacted Aboriginal heritage sites, AHIMS 52-2-1 108, 52-2-1029, 52-2-1030 and 52-2-1031 , as described in the EIS.	• 2018 IEA, AECOM, April 2018	Site Impact Recording Forms for the four previously impacted Aboriginal Heritage Sites, were prepared and submitted to OEH during the previous audit period. This condition is considered complete.	Complete
FIRE PREVENTION & MANAGEMENT				
C62	The Applicant shall: (a) design and construct the GO and ARRT Facility buildings to meet the fire safety requirements of the SCA; and (b) maintain a 10 metre wide Asset Protection Zone around the northern and western sides of the GO and ARRT Facility buildings.	• Interviews with SUEZ site personnel	Not triggered during the audit period	Not triggered
C63	The Applicant shall prepare an Emergency Response Plan for the site detailing procedures to be implemented in the event of a fire on or near the site. The Emergency Response Plan shall: (a) be prepared by a suitably qualified and experienced expert in consultation with Council and the NSW Rural Fire Service; (b) be submitted to the Secretary within three months of the date of this consent, or an alternative timing as otherwise agreed with the Secretary; and (c) detail emergency access and egress routes, including an alternative access route, escape routes, refuge areas, assembly points and evacuation procedures.	• ERP version 11, dated 4 June 2020 • ERP version 12, dated 5 May 2021 • ERP submission email, dated 30 October 2018	The Emergency Response Plan (ERP) was updated: <ul style="list-style-type: none"> on 11 July 2018 to update the Evacuation Diagram to cover the entire site and detail alternative access/egress routes from the landfill and existing GO facility in line with the 2018 IEA finding (Rev 9) on 10 April 2020 to include new action plan – Risk of drowning (Rev 10) on 4 June 2020 to update the number of Collection employees (Rev 11) on 5 May 2021 to update the number of landfill employees and reattach the consultation record which had been included in earlier versions but was missing from Rev 11 (Rev 12) (a) The ERP was prepared and revised by a number of SUEZ staff. Details of consultation are included in Appendix 6 of the Plan. (b) Rev 9 of the ERP was submitted to DPIE on 30 October 2018. The most recent ERP has not been submitted to the Secretary. (c) The plan includes Evacuation Diagrams for the different areas across the site.	Compliant 2021 IEA OFI 05 - Submit the most recent ERP to the Secretary
ENVIRONMENTAL MANAGEMENT Construction Environmental Management Plan				
D1	The Applicant shall prepare a Construction Environmental Management Plan (CEMP) for the Development, to the satisfaction of the Secretary. The Plan must: (a) be prepared in consultation with Council and be approved by the Secretary prior to construction of the Development; (b) identify the statutory approvals that apply to the site; (c) outline all environmental management practices and procedures to be followed during construction;	• Interviews with SUEZ site personnel • OEMP, dated 23 October 2018 • 2018 IEA report	As per the definitions of the consent, construction means: "As described in the EIS, including: <ul style="list-style-type: none"> Landfill re-profiling, stripping back covered areas and landfilling on top of existing waste; Construction of the GO Facility, earthworks, hardstand, internal access road, water and leachate infrastructure, 	Compliant 2021 IEA OFI 06 – Update OEMP as per previous IEA recommendation to make it clearer within the OEMP that it also incorporates the requirements of

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
	<p>(d) describe all activities to be undertaken on the site during construction, including a clear indication of construction stages;</p> <p>(e) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts;</p> <p>(f) describe the roles and responsibilities for all relevant employees involved in construction works; and</p> <p>(g) include the management plans under Condition D2 of this consent.</p>	<ul style="list-style-type: none"> GO Facility CEMP, April 2021 	<p><i>waste receivals and sorting areas, compost bunkers and storage areas;</i></p> <ul style="list-style-type: none"> <i>Construction of the ARRT Facility, earthworks, hardstand, buildings, biofilters, water infrastructure; and</i> <i>Mill Creek re-alignment."</i> <p>The 2018 IEA noted that the 'construction' activity of landfill re-profiling, stripping back covered areas and landfilling on top of existing waste was not covered by a CEMP but instead incorporated into the OEMP, required under Condition D4. A recommendation was made to update the OEMP to make it clearer that it also incorporates the requirements of Condition D1 for a CEMP for the works associated with reprofiling, stripping and landfilling on top of existing waste and seek Department approval of this approach. The OEMP was not updated to reflect this and this recommendation is still considered relevant.</p> <p>During the audit period, SUEZ prepared a CEMP for the GO Facility which includes as Appendix B, the CEMP for the Dual Gas and Leachate Trench construction works.</p> <p>a) The GO Facility CEMP for the GO Facility was prepared in consultation with SSC (as documented in Appendix A of CEMP) and submitted to DPIE on the 8 April 2021. At the time of writing, DPIE was yet to approve the Plan.</p> <p>b) Statutory approvals that apply to the site are identified in Section 3.1.</p> <p>c) Environmental management measures are outlined in Section 5.</p> <p>d) Staging of activities is discussed in Section 2.2. Construction activities are described in Section 2.3.</p> <p>e) Monitoring of environmental performance is outlined in Section 6, inspections auditing and reporting and Section 4.4, incident response.</p> <p>f) Roles and responsibilities are included in Section 4.1.</p> <p>g) Includes the required plans. Refer to Condition D2 below.</p>	<p>Condition D1 for a CEMP for the works associated with reprofiling, stripping and landfilling on top of existing waste and seek Department approval of this approach</p>
D2	<p>As part of the CEMP for the Development, required under Condition D1 of this consent, the Applicant shall include the following:</p> <p>(a) a construction management plan for the dual gas and leachate trench prepared in consultation with EPA (Condition C23);</p> <p>(b) an erosion and sediment control plan;</p> <p>(c) a vegetation and fauna management plan (Condition C43); and</p> <p>(d) a construction traffic management plan (Condition C48).</p>	<ul style="list-style-type: none"> CEMP for the Dual Gas and Leachate Trench construction works, dated 2 October 2018 CEMP for the GO Facility, dated April 2021 	<p>The CEMP prepared for the GO Facility dated includes:</p> <p>(a) A CEMP for the Dual Gas and Leachate Trench construction works, dated July 2017 attached in Appendix B. This version did not include consultation with the EPA</p> <p>(b) An erosion and sediment control plan attached in Appendix B</p> <p>(c) A vegetation and fauna management plan attached in Appendix C</p> <p>(d) A construction traffic management plan attached in Appendix E</p> <p>An updated CEMP was prepared for the Gas and Leachate Trench construction works dated 2 October 2018. Consultation with the EPA is included in Appendix 1.</p>	<p>Compliant</p>
D3	<p>The Applicant shall carry out construction of the Development in accordance with the CEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.</p>	<ul style="list-style-type: none"> Leachate Trench CEMP submission, email to DPIE dated 17 July 2018 	<p>To date, only construction of the trench has commenced.</p> <p>SUEZ reported that the CEMP for the dual gas and leachate trench was submitted to the Department on 17 July 2018 and approval received on 9 October 2018.</p>	<p>Compliant</p> <p>2021 IEA REC 10 - Retain records including completed checklists and</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
		<ul style="list-style-type: none"> DPIE letter - Leachate Trench CEMP approval, dated 9 October 2018 	<p>Staged approval of construction works is covered in Condition B14.</p> <p>Performance monitoring requirements for the Leachate Trench CEMP refer to daily and weekly checks undertaken under the OEMP, including visual checks on litter, noise, dust and odour by site supervisors and managers.</p> <p>During construction of the trench, SUEZ undertook informal supervision in the form of daily site inspections. No record of these inspections was provided. SUEZ advised that installation of the trench was undertaken in accordance with the CEMP, with no incidents or non-compliances being recorded.</p>	photographs as a record of CEMP implementation
Operational Environmental Management Plan				
D4	The Applicant shall amend the draft Operational Environmental Management Plan (OEMP) for the Landfill, GO and ARRT Facilities, to the satisfaction of the Secretary. The Plans must: (a) be prepared in consultation with Council and be approved by the Secretary prior to operation of the Development; (b) identify the statutory approvals that apply to the site; (c) outline all environmental management practices and procedures to be followed during operation; (d) detail how the environmental performance of the Development will be monitored, and what actions will be taken to address identified adverse environmental impacts; and (e) include the management plans under Condition D5 of this consent.	<ul style="list-style-type: none"> Interviews with SUEZ site personnel OEMP, dated 23 October 2018 OEMP submission email to DPIE, dated 26 October 2018 2018 IEA, AECOM April 2018 	<p>The OEMP was amended in 2017 to include landfill activities. As discussed under D1, the OEMP also includes landfill re-profiling and stripping back activities as they are done in conjunction with landfilling.</p> <p>The previous IEA assessed the amended OEMP against the requirements of this condition. This condition was assessed as non-compliant as DPIE approval of the OEMP had not been received prior to the commencement of landfilling. DPIE approval of the amended OEMP remains outstanding.</p> <p>The OEMP was further updated in October 2018 to incorporate the 2018 IEA recommendations and the new operating hours in accordance with MOD1. The updated OEMP was submitted to DPIE for approval on 26 October 2018 and to date no response has been received.</p> <p>Refer to the main report for review of the adequacy of the OEMP. SUEZ advised that it would prepare separate OEMPs for the GO and ARRT Facilities prior to operations commencing at these facilities.</p>	Compliant
D5	As part of the OEMP's for the Development, required under Condition D4 of this consent, the Applicant shall include the following: (a) site air quality and odour management plan (Condition C11); (b) ARRT Facility air quality and odour management plan (Condition C17); (c) biofilter and pre-treatment monitoring and maintenance plan (Condition C18); (d) aquatic habitat monitoring plan (Condition C33); (e) Mill Creek stream rehabilitation, stabilisation and vegetation management plan (Condition C34); (f) groundwater management plan (Condition C35); and (g) emergency response plan (Condition C63).	<ul style="list-style-type: none"> AQOMP, dated 10 April 2018 Mill Creek SRSVMP, GHD, dated April 2021 AHMP, GHD, dated April 2021 GMP, dated 31 January 2018 ERP version 12, dated 5 May 2021 	<p>The following plans were prepared or updated as part of the OEMP during the audit period:</p> <p>(a) Site AQOMP - latest update was on 10 April 2018 (b) ARRT Facility AQOMP – not triggered during the audit period (c) Biofilter and pre-treatment monitoring and maintenance plan – not triggered during the audit period (d) AHMP – dated April 2021 (e) Mill Creek SRSVMP – dated April 2021 (f) GMP – latest update was on 31 January 2018 (g) ERP – latest update was on 5 May 2021</p>	Compliant
D6	The Applicant shall operate the Development in accordance with the OEMP's approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	<ul style="list-style-type: none"> Audit site inspection Interviews with SUEZ site personnel SUEZ 'Landfill – Competency Skill Matrix' sighted during audit site inspection Select Civil Extended Duration Contractor 	<p>The landfill was generally operated in accordance with the OEMP during the audit period</p> <p>Examples of evidence of implementation of the OEMP include:</p> <p><u>Staffing and training requirements</u> SUEZ confirmed that the LHRRP Landfill Manager is the nominated Environmental Management Representative for LHRRP and, supported by compliance officers, is responsible for implementation of the OEMP. Refer to B11 for assessment of SUEZ and Select Civil training provision.</p> <p><u>Monitoring</u></p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
		<p>Audit dated 15 September 2020</p> <ul style="list-style-type: none"> • 2018, 2018 & 2020 AEMRs • CRG meeting minutes 8 March 2018 to 22 April 2021 • 30 October 2019 surface gas exceedances incident report • 17 December 2019 surface gas exceedance incident report • 30 September 2020 leachate discharge incident report • Letter to the Department dated 14 October 2020 – Incident Report – Discharge event at SUEZ New Illawarra Road Landfill SSD 6835 • Landfill Daily Checklist dated 2 May 2021 • Landfill Weekly Checklist dated 15 January 2021 • Leachate Inventory and Operations Checklists • Odour Patrol Checklist, 25 March to 3 May 2021 	<p>Monitoring results are required to be posted on the company website within 14 days (or made available on request) in accordance with the <i>Protection of the Environment Legislation Amendment Act 2011</i>. SUEZ report monitoring results biannually in CRG meetings (refer to D14) and in Annual Environmental Management Reports (refer to D9).</p> <p><u>Complaints</u> SUEZ complaints management system is outlined in Appendix K Complaint Investigation and Rectification Process. The OEMP trigger for an internal technical audit (15 or more complaints received within any calendar month) was in March 2018 following receipt of 20 complaints in relation to odour. SUEZ report complaints biannually in CRG meetings (refer to D14) and in Annual Environmental Management Reports (refer to D9).</p> <p><u>Incidents</u> SUEZ incident management system is outlined in PROC008-<i>Incident Reporting and Corrective Action Procedure</i>. The auditors note that, whilst an incident with potential to cause environmental harm involving discharge of leachate was reported immediately to the EPA, follow up reporting was not conducted within the required timeframe. The auditors also note that exceedances of trigger levels were not notified in accordance with SUEZ procedures during the audit period. Refer to D10 and D11 for a more detailed assessment.</p> <p><u>Inspections</u> SUEZ confirmed that a number of inspections are carried out during site operations and are recorded formally. These include:</p> <ul style="list-style-type: none"> • Odour Patrol Checklist (daily) • Leachate Inventory and Operations Daily Checklist • Landfill Daily Checklist • Landfill Weekly Checklist <p><u>Summary</u> In general, the site appeared to be operated in accordance with the OEMP.</p>	
Management Plan Requirements				
D7	<p>The Applicant shall ensure the Management Plans required under this consent are prepared in accordance with any relevant guidelines, and include:</p> <p>(a) detailed baseline data;</p> <p>(b) a description of:</p> <p>i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p> <p>ii) any relevant limits or performance measures/criteria; and</p> <p>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;</p> <p>(c) a description of the measures that will be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</p> <p>(d) a program to monitor and report on the:</p> <p>i) impacts and environmental performance of the Development; and</p> <p>ii) effectiveness of any management measures (see (c) above);</p> <p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the Development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <p>i) incidents;</p>	<ul style="list-style-type: none"> • OEMP, dated March 2017 • AQOMP, dated 10 April 2018 • GMP, dated 31 January 2018 • CEMP for the Dual Gas and Leachate Trench construction works, dated 2 October 2018 • Go Facility CEMP, GHD, dated April 2021 • Mill Creek SRSVMP, GHD, dated April 2021 	<p>The following plans had been prepared at the time of the audit, for review under this condition:</p> <ul style="list-style-type: none"> • OEMP • AQOMP • GMP • CEMP for the Gas and Leachate Trench • CEMP for the GO Facility • Mill Creek SRSVMP • AHMP <p>In general, the plans appeared to address the requirements of this condition. A more detailed assessment of the adequacy of the management plans is provided in the main report.</p>	Compliant

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
	ii) complaints; iii) non-compliances with statutory requirements; and iv) exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan. <i>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i>	<ul style="list-style-type: none"> AHMP, GHD, dated April 2021 		
Revisions to Strategies, Plans and Programs				
D8	Within three months of: (a) an audit submitted under Condition D12; (b) an incident report under Conditions D10 and D11; (c) an annual review under Condition D9; and/or (d) a modification to this consent, the Applicant shall review, and if necessary, revise the strategies, plans, and programs required under this consent to the satisfaction of the Secretary. <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 site.</i>	<ul style="list-style-type: none"> Interviews with SUEZ site personnel AQOMP, dated 10 April 2018 OEMP, dated 23 October 2018 2018 IEA report 	(a) The OEMP was updated following the 2018 IEA to incorporate the 2018 IEA findings and updated operating hours in line with MOD1. (b) There was no evidence that the management plans had been reviewed following the reportable leachate incident on the 30 September (refer D10). (c) The management plans had not been reviewed following submission of the AEMRs. (d) The AQOMP was not updated for MOD 1 in accordance with Condition C11A. On the basis that the plans had not been reviewed and updated following the leachate incident, annual reviews and MOD 1, this condition has been assessed as non-compliant.	Non-compliant 2021 IEA REC 17 - Implement a process to ensure management plans are reviewed (and revised if necessary) following a reportable incident, Annual Review and/or Modification to the consent. Ensure the review process is documented, in particular where plans are reviewed but do not require revision.
REPORTING				
Annual Review				
D9	By the end of December each year, and annually thereafter, the Applicant shall review the environmental performance of the site, to the satisfaction of the Secretary. This review must: (a) be submitted to the Secretary by the end of February each year; (b) describe the operations that were carried out in the past year; (c) analyse the monitoring results and complaints records of the site over the past year, including a comparison of these results against the: i) relevant statutory requirements, limits or performance measures/criteria; ii) monitoring results of previous years; iii) predictions in the EIS; (d) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (e) identify any trends in the monitoring data; (f) identify any discrepancies between the impacts predicted in the EIS and the actual impacts of the site and analyse the potential cause of any significant discrepancies; and (g) describe what measure will be implemented over the next year to improve the environmental performance of the site.	<ul style="list-style-type: none"> AEMR submission email dated 28 February 2019 2018 AEMR, dated 11 April 2019 Revised 2018 AEMR submission email dated 11 April 2019 2019 AEMR, dated March 2020 AEMR submission email dated 30 March 2020 AEMR extension email dated 25 February 2020 AEMR submission email dated 26 February 2021 2020 AEMR, dated February 2021 (updated 22 March 2021) Letter from the Department, LHRP Annual Review 2020, dated 23 April 2021 2020 AEMR, version 2 updated May 2021 	Annual Environmental Management Reports were submitted for the 2018, 2019 and 2020 calendar years. The AEMRs generally meet the requirements of this condition with the exception of shortcomings as noted in Department responses. The 2018 AEMR was submitted to the Department on 28 February 2019. The Department responded on 27 March 2019 noting additional information and formatting of information required, and requesting an amended report be provided no later than 12 April 2019. SUEZ obtained an extension for submission of the 2019 AEMR to 27 March 2020. The 2019 AEMR was submitted to the Department on 30 March 2020. SUEZ advised the auditors that the Department did not provide a response to the 2019 AEMR. The 2020 AEMR was submitted to the Department on 26 February 2021. The Department responded on 23 April 2021 requesting that the following be provided no later than 4 May 2021: <ul style="list-style-type: none"> details of non-compliances identified during the reporting period and any actions and/or corrective measures/procedures implemented to be provided as an addendum in table form more information on incidents which had occurred during the 2020 reporting period to be provided as an addendum in table form that the non-compliance in relation to waste limits be included in the addendum details (non-compliance and incidents) that the compliance status summary be expanded and completed for each of the subsections in this Condition. An updated AEMR was submitted to the Department on 18 May 2021. The Department response dated 27 May 2021 found the	Compliant 2021 IEA OFI 07 - Include further discussion of trends and monitoring data within the AEMRs including discussion of whether investigation trigger levels have been triggered. Consider including trigger levels and licence limits on graphs to facilitate comparison of results with the criteria

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
		<ul style="list-style-type: none"> AEMR submission email dated 18 May 2021 Letter from the Department, LHRRP Annual Review 2020, dated 27 May 2021 	<p>report to generally satisfy the reporting requirements of the consent in relation to the Annual Review and requested that the updated report be made publicly available on the company website.</p> <p>A review of the AEMRs conducted as part of this audit indicate that the reports generally satisfy the requirements, however, there is limited analysis of monitoring results to identify trends and comparison of monitoring results with investigation trigger levels.</p>	
Incident Reporting				
D10	Upon detecting an exceedance of the limits/performance criteria in this consent or the occurrence of an incident that causes (or may cause) material harm to the environment, the Applicant shall immediately (or as soon as practical thereafter) notify the Secretary and any other relevant agencies of the exceedance/incident.	<ul style="list-style-type: none"> 30 October 2019 surface gas exceedance incident, letter to EPA dated 31 October 17 December 2019 surface gas exceedance incident, letter to EPA dated 7 January 2020 30 September 2020 leachate discharge incident report SUEZ email to DPIE – Incident reporting for Lucas Heights, dated 8 October 2020 	<p>SUEZ reported one incident that had the potential to cause material harm to the environment during the audit period. The incident occurred on 30 September 2020 and resulted in leachate entering the stormwater system and subsequently entering a nearby creek. SUEZ reported that the EPA was notified immediately via phone. DPIE was notified of the incident by email and written report on 8 October 2020.</p> <p>Incidents involving an exceedance of the limits/performance criteria in this consent occurred during the audit period were as follows:</p> <ul style="list-style-type: none"> 2018 - none 2019 – none, however the auditors note there were exceedances with EPL criteria for surface gas 2020 – waste limit exceeded – not reported to DPIE or EPA <p>On the basis that the Department was not notified immediately (or as soon as practical thereafter) of the exceedance of the annual waste limit or the leachate discharge incident, this condition has been assessed as non-compliant.</p>	<p>Non-compliant</p> <p>2021 IEA REC 18 – Implement a process to ensure the Department is notified immediately of any exceedance of trigger values or limits</p>
D11	Within seven 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.	<ul style="list-style-type: none"> Email to EPA dated 8 October 2020 – Discharge event at SUEZ facility, New Illawarra Road Letter to the Department dated 14 October 2020 – Incident Report – Discharge event at SUEZ New Illawarra Road Landfill SSD 6835 	Following the leachate incident which occurred on 30 September 2020, SUEZ provided a written report to the EPA and DPIE on 8 October 2020. A second written report on the incident was sent to DPIE on 14 October 2020 via the Major Projects Portal.	Compliant
INDEPENDENT ENVIRONMENTAL AUDIT				
D12	Within one year of the date of this consent, and every three years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the site. The audit must: (a) be carried out by a suitably qualified, experienced and independent audit team whose appointment has been endorsed by the Secretary; (b) assess the environmental performance of the site, and its effects on the surrounding environment; (c) determine whether the site is complying with the relevant standards, performance measures and statutory requirements; (d) review the adequacy of the Environmental Management Plans for the site, compliance with this consent, and any other licences and consents; and, if necessary;	<ul style="list-style-type: none"> 2021 IEA audit report 	<p>This report presents the findings of the second independent environmental audit (site inspections undertaken on the 4 and 5 May 2021).</p> <p>As this audit was not conducted within three years of the previous audit (dated 23 January 2018) the timing of the audit has been assessed as not compliant with this condition. The auditors note that the delay was due in part to audit team availability and uncertainty over COVID-19 procedures.</p> <p>(a) The audit was conducted by suitably qualified and experienced auditors from AECOM. Helen Onus (lead</p>	<p>Non-compliant</p> <p>2021 IEA REC 19 – Ensure IEAs are conducted within 3 years</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
	(e) recommend measures or actions to improve the environmental performance of the site, and/or any plan/program required under this consent.		<p>auditor), Shani Walton (auditor), Kelly Pearsall (Technical Reviewer) were approved by the Department by letter dated 4 February 2021.</p> <p>(b) The environmental performance of the site is assessed in Section 5.</p> <p>(c) Refer to relevant conditions requiring assessment of relevant standards, performance measures and statutory requirements.</p> <p>(d) Refer to the main report for a review of the adequacy of the EMPs required under this consent. This report presents the findings of the assessment of compliance with the conditions of consent.</p> <p>(e) A number of recommendations have been made through this report. These recommendations are summarised in Section 8.</p>	
D13	Within three months of commissioning the audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary with a response to all recommendations contained in the audit report.	<ul style="list-style-type: none"> SUEZ letter to DPIE - 2018 IEA submission, dated 20 April 2018 	2018 IEA audit report and SUEZ response to the recommendations was submitted to the Department on 20 April 2018, within the required timeframe.	Compliant
COMMUNITY ENGAGEMENT				
Community Reference Group				
D14	The Applicant shall establish and maintain a Community Reference Group (CRG) to maintain regular communication with the local community regarding activities on the site, any environmental impacts, monitoring results and management actions. The CRG shall include representatives from the local community, recreational and sporting clubs, ANSTO, Council and the Applicant. The CRG shall meet on a quarterly basis.	<ul style="list-style-type: none"> CRG meeting minutes 8 March 2018 to 22 April 2021 	<p>The Community Reference Group (CRG) was operational during the audit period. The CRG is chaired by the SUEZ Education & Sustainability Officer and includes community members and SUEZ employees. Invitees also include ANSTO and the meetings are occasionally attended by local and state members of parliament. The meetings were held quarterly during 2018, then biannually from 2019 onwards. Sample minutes reviewed include 8 March 2021, 7 June 2018, 24 October 2019, 16 July 2020 and 22 April 2021.</p> <p>A review of the meeting minutes noted that the meetings include updates on operations, environmental matters and developments and include a summary of outstanding actions.</p> <p>The Environmental update is an attachment to the minutes and includes a summary of environmental monitoring and complaints. The attachments were not provided on the website.</p>	Compliant
Access To Information				
D15	<p>The Applicant shall make the following information publicly available on its website and keep the information up to date.</p> <p>(a) the EIS, RTS, CEMP and OEMPs;</p> <p>(b) current statutory consents, approvals and licences for the site;</p> <p>(c) approved strategies, plans and programs;</p> <p>(d) a summary of all monitoring data for the site as required under this consent;</p> <p>(e) a complaints register, updated on an annual basis;</p> <p>(f) Annual Reviews, Independent Environmental Audits and the Applicant's response to the recommendations; and</p> <p>g) any other matter required by the Secretary.</p> <p><i>Note: This requirement does not require any confidential information to be made available to the public.</i></p>	<ul style="list-style-type: none"> SUEZ website 	<p>The following information was available on the SUEZ website, when reviewed on the 16 May 2021:</p> <ul style="list-style-type: none"> Development Consent (SSD 6835), dated 23 January 2017 MOD 1 (SSD 6835) dated 23 September 2019 EPL 12520, dated 22 August 2018 OEMP for the LHRRP, dated March 2017. As noted in the 2018 IEA, this is not the most recent version of the OEMP. SUEZ needs to update the website to include Version 3, dated 23 October 2018. In addition, the Appendices to the OEMP had not been attached on the website. A link to the DPIE Major Projects Assessment website for SSD 6835, which includes the EIS and RTS. AEMR 2019 2018 IEA Audit Report 	<p>Non-compliant</p> <p>2021 IEA REC 20 – Ensure all of the documents required by Condition D15 are uploaded onto the SUEZ website</p>

Reference No.	Condition	Evidence	Comment	Finding and Recommendation
			<ul style="list-style-type: none"> Environmental Report Action Plan CEMP for the dual gas and leachate trench Surface Gas Monitoring Reports PIRMP dated May 2020 Environment Policy dated 2017. <p>The following documents required under this condition were not provided on the website:</p> <ul style="list-style-type: none"> Noise monitoring data from the annual noise monitoring report, required under Condition C56. Complaints register Air quality and odour management plan (Condition C11) Groundwater management plan (Condition C35) Emergency response plan (Condition C63) AEMRs for 2018 and 2020 Current EPL 5065, 10 September 2019 (website had older version, November 2018). 	

Appendix B 2018 IEA Recommendations

The table below provides a summary of the recommendation and opportunities for improvement included in the 2018 IEA. The audit reviewed the actions taken against these recommendations during the audit period.

Ref	Recommendation / Opportunity for Improvement	Action since 2018 IEA
2018-IEA-REC01	Review oil storage requirements to enable drums to be stored without stacking and to ensure bunds have adequate capacity.	Outstanding Refer to CoC C37
2018-IEA-REC02	Investigate the stained soil around the underground waste oil pit next to the maintenance yard and clean up and dispose of affected soil to an appropriately licensed facility.	Closed out Stained soil was observed to have been removed
2018-IEA-REC03	Ensure hoses are correctly stored when not in use to prevent drips / spills outside of the bunded area.	Closed out Hoses were observed to be correctly stored during audit site visit
2018-IEA-REC04	Ensure drains are inspected and cleaned regularly.	Closed out Drains were observed to be generally clean and in reasonable condition during audit site visit
2018-IEA-REC05	Ensure stockpiles of organics are maintained to be less than 4 m in height as per the GO Facility EMP.	Closed out Stockpiles were generally observed to be less than 4m in height during audit site visit
2018-IEA-REC06	Recommendation to revise the OEMP as outlined in Section 7.	Outstanding Refer to consolidated recommendations relating to the OEMP in Section 7.1
2018-IEA-REC07	SUEZ should investigate if the integrity of the main leachate pond liner has been impacted by the whaling of the liner and repair it as required.	Closed out Liner repair completed June 2019
2018-IEA-REC09	Ensure evidence of consultation is submitted to DPIE as part of the relevant documentation required by the conditions of consent. This should include details of any outstanding issues raised during the consultation and an explanation of the agreement reached.	Closed out Evidence of consultation provided with management plans recently submitted to DPIE (Refer to CoC B18)
2018-IEA-REC11	Submit the final Odour Audit to SSC and EPA as per C12(b).	Closed out Odour Audit submitted to SSC 11 April 2018
2018-IEA-REC12	Ensure the 2017 annual review includes a calibration of the leachate model included in the EIS or seek a modification to this requirement.	Closed out Leachate model calibrated in 2018 and 2020
2018-IEA-REC13	Submit the updated GMP to EPA, DPI Water and DPIE	Closed out

Ref	Recommendation / Opportunity for Improvement	Action since 2018 IEA
		GMP submitted to DPI Water for review. Pending resolution of groundwater extraction licence discussion. Refer CoC C36
2018-IEA-REC14	Submit a modification to have this condition removed if the EPA and DPI Water agree that these bores are no longer necessary	Outstanding Refer to CoC C36
2018-IEA-REC16	Make it clearer within the OEMP that it also incorporates the requirements of Condition D1 for a CEMP for the works associated with re-profiling, stripping and landfilling on top of existing waste and seek DPIE approval of this approach	Outstanding Included in consolidated recommendations relating to the OEMP in Section 7.1
2018-IEA-REC17	Seek a staged submission of the CEMP, required under Condition D1 and D2 to allow submission of the CEMP for the dual gas and leachate trench separately to the CEMP for the construction works	Closed out SUEZ received approval from the Department for staged submission on 9 October 2018. SUEZ requested further approval of staged construction on the 21 April 2021. Approval was provided on 22 June 2021.
2018-IEA-REC18	Review the documents contained in the appendices of the OEMP and revise as required, including attachment of the most recent plans under this condition, AQOMP and GMP	Outstanding Included in consolidated recommendations relating to the OEMP in Section 7.1
2018-IEA-REC19	Review the requirements of this condition and upload the required documentation to the SUEZ website	Outstanding Refer to CoC D15 for list of documents that are required to be uploaded to website
2018-IEA-OFI09	Update the Evacuation Diagram within the ERP to include the entire site and detail alternative access / egress routes from the landfill and existing GO facility.	Closed out ERP updated 31 May 2018
2018-IEA-OFI10	There is an opportunity for the OEMP to capture the requirements of the PCYC EPL to ensure the requirements of the EPL are not missed.	Not applicable PCYC EPL surrendered 30 July 2019

Appendix C DPIE Audit Team Approval

SUEZ Recycling & Recovery Pty Ltd
3 Rider Boulevard
Rhodes NSW 2138

Our ref: SSD-6835-PA-2

4 February 2021

Attention: LC Chiang, Landfill Manager

Email: lc.chiang@suez.com

Dear Mr Chiang

**Agreement of Independent Auditor
Lucas Heights Landfill (SSD-6835)**

I refer to your request (**SSD-6835-PA-2**) seeking the agreement of the Secretary of the Department of Planning, Industry and Environment NSW (**Department**) of suitably qualified, experience and independent audit team to undertake the 2021 Independent Environmental Audit for the Lucas Heights Landfill approved under SSD 6835, as modified (**Consent**).

In accordance with Schedule D Condition D12 of the Consent, the Secretary has agreed to the following audit team:

- Helen Onus, Director Ethos Environmental as lead auditor;
- Shani Walton, Principal Environmental Consultant, AECOM as assistant auditor;
- Kate Michelmores, Senior Environmental Scientist, AECOM as assistant auditor; and
- Kelly Pearsall, Technical Director- Environment, AECOM as assistant auditor.

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the requirements of Schedule D, Condition D12 of the Consent. The Department also recommends consideration be given to the *Independent Audit Post Approval Requirements* (Department 2018) to the extent that it does not contradict Schedule D, Condition D12 of the Consent. Failure to meet these requirements will require revision and resubmission.

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

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

Yours sincerely



Julia Pope
Team Leader Compliance Metro
As nominee of the Planning Secretary

Appendix D Independent Audit Report Declaration Form

Independent Audit Report Declaration Form

Project Name	Lucas Heights Resource Recovery Park
Consent Number	SSD 6835
Description of Project	Increase landfill capacity, relocate and expand the garden organics facility and construct and operate a new resource recovery facility
Project Address	New Illawarra Road, Lucas Heights
Proponent	SUEZ Environmental Pty Ltd
Title of Audit	SUEZ Lucas Heights Resource Recovery Park Independent Environmental Audit 2021
Date	26 June 2021

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor

Helen Onus

Signature

A handwritten signature in black ink, appearing to read 'Helen', with a long, sweeping horizontal stroke extending to the right.

Qualification

BSc Environmental Biology, Master Environmental Management

Company

Ethos Environmental

Company Address

Kogarah, NSW

Independent Audit Report Declaration Form

Project Name	Lucas Heights Resource Recovery Park
Consent Number	SSD 6835
Description of Project	Increase landfill capacity, relocate and expand the garden organics facility and construct and operate a new resource recovery facility
Project Address	New Illawarra Road, Lucas Heights
Proponent	SUEZ Environmental Pty Ltd
Title of Audit	SUEZ Lucas Heights Resource Recovery Park Independent Environmental Audit 2021
Date	26 June 2021

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor

Shani Walton

Signature



Qualification

BEng Civil and Structural Engineering (Hons), Master
Environmental Engineering Management

Company

AECOM

Company Address

Sydney, NSW

Independent Audit Report Declaration Form

Project Name	Lucas Heights Resource Recovery Park
Consent Number	SSD 6835
Description of Project	Increase landfill capacity, relocate and expand the garden organics facility and construct and operate a new resource recovery facility
Project Address	New Illawarra Road, Lucas Heights
Proponent	SUEZ Environmental Pty Ltd
Title of Audit	SUEZ Lucas Heights Resource Recovery Park Independent Environmental Audit 2021
Date	26 June 2021

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor

Kelly Pearsall

Signature



Qualification

Grad Diploma Urban and Regional Planning, BSc (Hons)
Environmental Science

Company

AECOM

Company Address

Sydney NSW