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# 2023 Independent Environmental Audit Cleanaway Pty Ltd Erskine Park Waste Transfer Station

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**We declare that:**

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

Report version	Authors	Date	Reviewer	Approved for issue	Date
Draft (V1)	R. Loemker	12/10/2023	A. Parsons	A. Parsons	12/10/2023
Final (V2)	R. Loemker	07/11/2023	A. Parsons	A. Parsons	10/11/2023

## Executive Summary

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

The audit was conducted by Jackson Environment and Planning Pty Ltd in September 2023, as required under Condition C8 of the Development Consent (SSD 7075). The scope of the Audit was limited to the period between December 2019 to November 2022. The audit was conducted in accordance with the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2020).

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

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

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

- SSD 7075 compliance conditions:
  - Nine (9) non-compliances were identified during the Audit.
- EIS statement of commitments:
  - One (1) non-compliance was identified during the Audit.
- EPL 20986 licence conditions:
  - Three (3) non-compliances were identified during the Audit.

The NSW Environment Protection Authority, NSW Department of Planning and Environment, Penrith City Council were consulted on the environmental performance of the development. Only the NSW Department of Planning and Environment responded and requested that the requirements of the Conditions of Consent and the Independent Audit Post Approval Requirements 2020 are satisfied in the submission.

During the on-site audit, evidence suggested that the WTS operations were well managed, with very good control of odour, pests, dust, management of waste, traffic management and emergency management. However, some of the external areas of the operation showed evidence of litter accumulation (though no evidence of litter movement beyond the boundaries), with some residual waste materials that have been tracked out of the enclosed Waste Transfer Station and require clean up.

Maintenance of landscaping around the development appears to have improved since the 2020 Independent Environmental Audit, with previously exposed soil surfaces now covered with grass.

The unsealed road leading into the skip bin storage area of the Site (Stage 2 Area) was observed to be a source of sediment tracking onto hardstand areas at the front of the Site. On windy days, this sediment can contribute to dust generation.

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

As identified in the 2020 Independent Environmental Audit, one of the main areas for improvement is general housekeeping of the premises, particularly the external areas of the development. This includes dust control and regular cleaning of hardstand areas and cleaning up of spilled waste.

The Auditors recommend Cleanaway investigate options for reducing the amount of waste / litter being tracked outside of the WTS from walking floor trucks. This might include automated systems that remove rubbish from the top of the walking floors before exiting the WTS.

Alternatively, it is recommended that Cleanaway investigate options to reduce the amount of litter that is left at the tarp-up area. This might include:

- Additional covered waste bins for drivers to dispose of waste; or
- Dedicated personnel to attend the tarp-up area full time to collect the waste.

Training for employees on general housekeeping responsibilities, litter and odour management should be kept current.

The Stage 2 Area needs to be landscaped with grass as required by Landscape Plan of the OEMP to control sediment generation. This will reduce the amount of sediment tracking on the hardstand area at the front of the Site.

Whilst the landscaping in the Stage 2 Area is being established, street sweeping should continue with education of contractors to carry out a more thorough street sweeping, particularly at the base of the unsealed access road to the Stage 2 Area.

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# 1. Introduction

This report presents the findings of the Independent Environmental Audit (the Audit) conducted by Jackson Environment and Planning Pty Ltd (JEP) in September 2023. Cleanaway Pty Ltd (Cleanaway) commissioned JEP to conduct the Audit and assess the environmental performance of the Erskine Park Waste Transfer Station (WTS), located at 85-87 Quarry Road, Erskine Park NSW for the period between December 2019 to November 2022.

On 23<sup>rd</sup> August 2023, the Department of Planning and Environment approved the audit team to undertake the audit (refer to Appendix B).

## 1.1. Background

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

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

- Modern weighbridges;
- Three fast-acting roller doors to facilitate truck movement in and out of the WTS;
- A motorised fresh make-up building louvre system that facilitates the action of the Tri-Stack exhaust system for exhaust fume and odor control;
- Full containment and extraction of internal building air via a Tri-Stack system;
- A scrubber system capable of fully servicing the design airflow of one of the three identical Tri-Stack fan units;
- A process control room, consisting of a supervisory control and data acquisition (SCADA) system, responsible for the monitoring and control of the Tri-stack and scrubber systems;
- An auger screen and sorting line<sup>2</sup>; and
- A truck loading area that is fully enclosed as part of the normal operation of the WTS building.

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

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

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

<sup>1</sup> This has been increased to 3,000 tonnes of waste at any one time under Mod 5. However; it is important to note that Mod 5, which was approved on 7<sup>th</sup> July 2023, falls outside the temporal period of the Audit and has therefore not been assessed under this Audit.

<sup>2</sup> Not in operation at the time of the Audit.

- (f) *recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.*

Condition C9 states:

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

## 1.2. Audit team

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

Mr Rylan Loemker has a degree in Environmental Science (Hons) and a Graduate Diploma in Business and Technology. Rylan has supported numerous Independent Environmental Audits, including for Veolia (Camellia Resource Recovery Facility, Clyde Waste Transfer Terminal and Banksmeadow Waste Transfer Terminal), Cleanaway (Erskine Park Waste Transfer Station) and J.J. Richards & Sons (Glendenning Liquid Waste Facility).

Mr Alan Parsons was an Exemplar Global certified lead auditor (20 years) in quality, occupational health & safety, environmental management systems and environmental management (Registration Number 14045). More recently the registration was transferred to DNVGL. Alan has extensive knowledge of the requirements for compliance to ISO 9001: 2015, ISO 14001: 2015 and ISO 45001: 2018, ISO 27001: 2013 management systems standards as examples. Alan has been a qualified Lead Auditor throughout this period with these organisations.

## 1.3. Audit objectives

The objectives of this the Audit are to:

- Assess the environmental performance of the Site operations between December 2019 to November 2022;
- Review any non-compliances identified in 1<sup>st</sup> year audit, which covered the period between December 2018 to November 2019 and the actions that have been carried out to resolve these non-compliances; and
- Summarise the findings of the Audit and provide recommendations for improvement (if any).

## 1.4. Audit scope

The considerations relevant to the scope of the Audit include:

- Site changes and upgrades;
- Documentation; and
- Spatial Scope.

### 1.4.1. Site changes and upgrades

A total of five modifications to Development Consent (SSD 7075) have been submitted under Section 96(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and approved by the Department of Planning and Environment.

The modifications are summarised below:

- Modification 1 (Mod 1) involved modifications to the development staging, car and truck parking, the office, the load-out bays, the stormwater management system, site levels and landfill ramps;
- Modification 2 (Mod 2) involved modifications to the site levels, access ramp and car parking;



- Modification 3 (Mod 3) involved modifications to the installation of a manual sort line, minor site layout alterations and minor building design alterations;
- Modification 4 (Mod 4) involved extending the construction hours for Stage 1 of the development; and
- Modification 5 (Mod 5) permits the processing up to 35,000 tpa of glass waste, the increased on-site waste storage within the WTS from 1,040 t to 3,000 t at any given time, and the removal of the manual sort line and replacement with a glass sort line.

It is important to note that Mod 5, which was approved on 7<sup>th</sup> July 2023, falls outside the temporal period of the Audit and has therefore not been assessed under this Audit.

### 1.4.2. Documentation

The scope of the Audit was limited to assessing the environmental performance of the Site in accordance the conditions of Development Consent SSD 7075 for the period between December 2019 to November 2022. The scope of the audit included an assessment of the following matters:

- The conditions of all relevant approvals;
- Management plan requirements;
- The requirements of relevant regulatory agencies;
- The status of the operation;
- The key regulatory risks, including past or future risks;
- The predictions of environmental impact assessments;
- The performance of the operation;
- Results from previous audits;
- Evidence of actions to address any non-compliances identified in the previous audit;
- Annual environmental audit reports;
- Any incidents or community complaints;
- Feedback received from other regulatory agencies on the performance of the operation;
- Feedback received from the community / community consultative committee on the performance of the operation; and
- Agency policy or other focus area.

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

Records reviewed fell within this period; however, some observations made by the Auditors relate to the site inspection and audit conducted on 14<sup>th</sup> September 2023.

The audit was conducted in accordance with the *Independent Audit Post Approval Requirements* (NSW Department of Planning, Industry and Environment, 2020) (the Independent Audit Requirements).

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

### 1.4.3. Spatial Scope

The WTS is located at 85-87 Quarry Road Erskine Park NSW entirely within Lot1 DP1140063. The spatial scope of the audit is shown in Figure 1.1. The Audit excludes the Enviroguard landfill and connected leachate treatment plant and the area identified as Phase 2 which is planned for a future development subject to separate development approval and licensing.

## 1.5. Audit period

This audit is required under Condition C8 of the Development Consent (SSD7075). Specifically, condition C8 states:

*C8. Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development...*

Jackson Environment and Planning Pty Ltd conducted the 1<sup>st</sup> year audit which covered the period between December 2018 to November 2019. This Audit covers the period between December 2019 to November 2022.



Figure 1.1. Spatial scope of the 2023 Independent Environmental Audit - Cleanaway Pty Ltd.'s Erskine Park Waste Transfer Station (Audit boundaries are shown in yellow). The Audit excludes the "Phase 2" area which is the area shown in red.



## 2. Audit Methodology

### 2.1. Selection and endorsement of audit team

In accordance with Condition C8 of SSD 7075 and Section 3.1 of the Independent Audit Requirements, Cleanaway presented the Audit Team to the Department of Planning, Industry and Environment and sought approval for the team put forward.

The Audit team from Jackson Environment and Planning Pty Ltd included Rylan Loemker (Technical Auditor) and Alan Parsons (Lead Auditor). The qualifications and experience of the audit team are summarised in Table 1.1.

The Department of Planning and Environment approved the audit team to undertake the audit on 23<sup>rd</sup> August 2023 (refer to Appendix B).

The Independent Audit Certification is provided in Appendix D.

### 2.2. Independent Audit scope development

The audit scope was developed with consideration to:

- Site changes and upgrades;
- Temporal period;
- Documentation; and
- Spatial Scope.

The scope of the audit also considered the requirements of the conditions of consent and any previous audits undertaken. The audit will also include the requirements of the Environment Protection Licence (EPL) for the Site, which is not specifically required under Condition C8.

An audit plan was then prepared in consultation with Cleanaway, and this is provided in Appendix F.

### 2.3. Compliance evaluation

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

- **Audit initiation** – Documents relating to the Audit period between December 2019 to November 2022 as well as the findings of previous audit were requested;
- **Document review** – Received documentation was reviewed for the purpose of developing the Audit plan of what will be audited;
- **Audit plan** – An audit plan was developed outlining what would be audited, who would do the auditing, when it would happen and who would be audited;
- **Onsite audit** – The onsite audit began with an opening meeting to make introductions, confirm the scope and extent of the Audit and discuss the schedule. Following the meeting, documents immediately presented by Cleanaway were reviewed to gather relevant information that might not have been available beforehand. The auditors then commenced the Audit by interviews and collecting the records / observations that demonstrated whether the processes meet the Development Consent conditions and EPL requirements. Audit findings and any audit conclusions were presented at the closing meeting; and
- **Audit Report (this report)** – The final findings will be formally written and distributed in an audit report.



An evidence-based evaluation approach was used when conducting the Audit. Relevant evidence was discussed during the audit meeting and site inspection to help inform the view of the Auditors as to whether the documents provided were adequate and whether the site was operating in a compliant or non-compliant manner. Evidence assessed as part of the Audit included:

- Relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author);
- Interviews of relevant site personnel;
- Photographs (including the date the photograph was taken);
- GIS figures and associated shapefiles (as relevant and available);
- Site inspections of relevant locations, activities and processes;
- Monitoring data and analysis including the period covered by the monitoring data; and
- Delivery records, invoices and receipts including the record date and reference number.

## 2.4. Site interviews

The following Cleanaway Pty Ltd staff were available to support the audit interview and site inspection. These personnel, including names and position titles are noted in Table 2.1 below.

**Table 2.1. Cleanaway Pty Ltd representatives supporting the Audit.**

Name	Position	Organisation
Mr. Haydn Rossback	Environmental Business Partner – NSW/ACT	Cleanaway Pty Ltd
Mr. Giovanni Ruscio	Branch Manager - Auburn & Erskine Park	Cleanaway Pty Ltd
Ms. Nathalie Ward	Administration Officer	Cleanaway Pty Ltd

## 2.5. Site inspections

The auditors attended a site inspection on 14<sup>th</sup> September 2023. Photographs taken during the site inspection are provided in Appendix E.

## 2.6. Consultation

As part of the audit process, Jackson Environment and Planning consulted the NSW Department of Planning and Environment, NSW Department of Planning, Industry and Environment, NSW Department of Primary Industries, Transport for NSW, Sydney Water and Penrith City Council on key environmental issues which need to be considered in the Independent Environmental Audit. Letters were sent to each agency providing an opportunity to provide feedback which was requested by 4 October 2023. The letters and responses are contained within Appendix C.

## 2.7. Compliance status descriptors

The compliance assessment criteria as outlined by the Department of Planning and Environment in the *Independent Audit Post Approval Requirements* (2020) has been used in this Audit (see Table 2.2 below).

**Table 2.2. Compliance assessment criteria as per DPE (2020) *Independent Audit Post Approval Requirements*.**

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



## 3. Audit Findings

This section provides the main findings of the Audit to address all the requirements of Condition C8 of SSD 7075 (as modified). The compliance checklists are provided in the Appendix A as follows:

- SSD 7075 compliance conditions - Table A1;
- EIS statement of commitments - Table A2; and
- EPL 20986 licence conditions - Table A3.

### 3.1. Approval and document list

Key documentation reviewed as part of the Audit includes the following documents relevant to the Audit period. Specific items of evidence used to assess compliance to the conditions of consent under SSD 7075 (as modified) are outlined in the compliance audit tables in Appendix A.

- Annual Review Nov 2019-Oct 2020 (dated November 2020);
- Annual Review Nov 2020-Oct 2021 (dated July 2022);
- Annual Review Nov 2021-Oct 2022 (dated November 2022);
- Annual Return 2020;
- Annual Return 2021;
- Annual Return 2022;
- Complaints register;
- Incident register;
- Meteorological data;
- Odour management system maintenance records/invoices;
- Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (dated August 2023) and subplans:
  - Odour Management Plan;
  - Stormwater Maintenance and Operations Plan;
  - Leachate Management System;
  - Operational Waste Management Plan;
  - Landscape Plan; and
  - Pollution Incident Response Management Plan (PIRMP).
- Rapid roller door repair quote;
- Regulator notices;
- Training records;
- Waste and Resource Reporting Portal reports (December to 2019 to November 2022 inclusive);
- Weighbridge records (December to 2019 to November 2022 inclusive); and
- Weighbridge calibration records.

## 3.2. Compliance performance

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

A total of thirteen (13) non-compliances were observed during the audit in response to the three sets of conditions/commitments detailed below. It should be noted that some of the non-compliances are concurrent or common to all three aspects.

It is noted that two of the non-compliances under the conditions of SSD 7075 (Condition B11 and Condition B16) were reported in the Annual Reviews which have been submitted to the Department of Planning and Environment. Therefore, these two non-compliances have been addressed in previous correspondence and closed out with the Department of Planning and Environment.

In response to these non-compliances, the Auditors have recommended improvements for Cleanaway to implement to ensure operation of the facility continues in an environmentally sound manner in accordance with the conditions of consent and other approvals. A summary of the non-compliances that were identified during the 2023 Audit is provided below:

- SSD 7075 compliance conditions:
  - Nine (9) non-compliances were identified during the Audit.
- EIS statement of commitments:
  - One (1) non-compliance was identified during the Audit.
- EPL 20986 licence conditions:
  - Three (3) non-compliances were identified during the Audit.

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

## 3.3. Summary of agency notices, orders, penalty notices or prosecutions

On the 5 October 2022, Cleanaway received a Warning Letter indicating a breach of Section 4.2(1)(b) of the *Environmental Planning and Assessment Act 1979*. The letter indicates Cleanaway has committed an offence against section 4.2 (1)(b) of the *Environmental Planning and Assessment Act 1979* carrying out development not in accordance with the conditions of development consent.

Specifically, Cleanaway failed to comply with the Schedule C, Conditions B11 of SSD 7075 as modified which states:

*The Applicant shall carry out the Development in accordance with the Odour Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.*

This pertains to odour monitoring not being undertaken during April 2021 and May 2021.

A Warning Letter was issued by the Department as it was determined that no formal enforcement action was warranted in the circumstances, considering no complaints were received as a result of the non-compliance, Covid-19 restrictions impacted staff movements and field-based work outcomes and the proponent advised that high rainfall resulted in a backlog of field work for the referenced period.

No other official cautions, warning letters, penalty notices or prosecution proceedings were received by Cleanaway during the Audit period.

## 3.4. Non-compliances

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

Under Schedule B, the site was non-compliant against two (2) conditions of consent. A summary of these non-compliances found for each condition is provided below.

**Condition A5** requires Cleanaway to carry out the development of the Waste Transfer Station in accordance with the conditions outlined in Schedule C. There were seven (7) non-compliances under Schedule C (refer to Section 3.4.2).

**Condition A9** requires Cleanaway to implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the development. The five (5) non-compliances that were identified in relation to the operations at the Site (Conditions B4, B11, B15, B16 and B20 as summarised below) would indicate measures to prevent and or minimise any harm to the environment are not being fully implemented.

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

Under Schedule C, the Site was non-compliant against seven (7) conditions of consent. A summary of these non-compliances found for each condition is provided below.

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

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

The five (5) non-compliances that were identified in relation to the operations at the Site (Conditions B4, B11, B15, B16 and B20 as summarised below) would indicate that the Development is not being carried out accordance with the documents listed under Condition A1.

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

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

The five (5) non-compliances that were identified in relation to the operations at the Site (Conditions B4, B11, B15, B16 and B20 as summarised below) would indicate that the actions or measures within the reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent are being fully implemented.

**Condition B4** requires the premises to be maintained in a condition that minimises or prevents the emission of dust from the premises. Section 4.2, Table 7 of the Erskine Park Waste Transfer Station – Stage 1 Operational Environmental Management Plan (dated August 2023) provides mitigation measures that will be implemented to manage dust.

Whilst the site inspection on 14 September 2023 found evidence of good internal dust control, with the misting system in operation and the rapid roller door being kept closed (except when trucks entering and exiting), the tracking of sediment onto the concrete hardstand at the front of the Site was identified as a source of dust on the premises (refer to photograph in Figure E4 in Appendix E). The cause of the sediment is the unsealed accessway to the Stage 2 area.

Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the Operational Environmental Management Plan (OEMP) to control sediment generation from the Stage 2 area.

Since the previous Independent Environmental Audit in 2020, the landscaping of the grounds around the facility has improved. In addition, the street sweeping frequency has increased daily however this needs to be carried out more thoroughly.

**Condition B11** requires Cleanaway to carry out the Development in accordance with the Odour Management Plan (OMP) approved by the Secretary. The site inspection on 14 September 2023 found that all existing mitigation measures to prevent odour emissions were being implemented.

However, in accordance with the OMP, there is a protocol for annual monitoring at the WTS in the months of March, April, May, June, and September. It was identified in the Annual Review Nov 2021-Oct 2022 (dated November 2022) that odour monitoring was not undertaken during April 2021 and May 2021. This was caused by an unavailability and oversight by the odour monitoring consultant. Cleanaway has implemented further controls to ensure all odour monitoring is undertaken in accordance with SSD 7075 Schedule C Condition B11.

It is noted that this non-compliance was reported in the Annual Review which has been submitted to the Department of Planning and Environment and was closed out with the Department of Planning and Environment.

**Condition B15** requires Cleanaway to operate the premise to comply with section 120 of the *Protection of the Environment Operations Act 1997*, which prohibits the pollution of waters, except as expressly provided in the EPL.

The Site inspection by the Auditors on 14 September 2023 found a buildup of litter at the tarp-up area of the WTS, which has the potential to become windborne and impact on nearby stormwater quality (refer to photograph in Figure E8 in Appendix E).

It is understood that Cleanaway currently cleans this area once per day, at the end of the day. However, there is still the potential for litter to become windborne.

In addition, the tracking of sediment onto the concrete hardstand at the front of the Site was identified as a source of sediment that could lead impact on nearby stormwater quality (refer to photograph in Figure E4 in Appendix E). The cause of the sediment appears to be the unsealed accessway to the Stage 2 area.

**Consent Condition B16** requires a stormwater management scheme to be prepared for the development and must be implemented in consultation with the EPA. Implementation of the scheme must mitigate the impacts of stormwater run-off from and within the premises following the completion of construction activities. The scheme should be consistent with the Stormwater Management Plan for the catchment.

Section 8.3 Water Quality Monitoring of the Stormwater Maintenance and Operation Plan (SMOP) requires water quality monitoring to be conducted during discharge events in accordance with the frequency listed in Table 1 of the SMOP to verify that the treatment train is working as intended.

Discharges from the bioretention basin during the Audit period were not monitored because of an administrative oversight in subcontractor engagement.

It is noted that this non-compliance was reported in the Annual Review which has been submitted to the Department of Planning and Environment and was closed out with the Department of Planning and Environment.

**Condition B20** requires Cleanaway to implement erosion and sediment control measures on-site in accordance with *Managing Urban Stormwater: Soils and Construction Vol. 1* (Landcom, 2004).

However, during the site inspection on 14 September April 2023, the tracking of sediment onto the concrete hardstand at the front of the Site was identified as a source of dust on the premises (refer to photograph in Figure E4 in Appendix E). The cause of the sediment is the unsealed accessway to the Stage 2 area. Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.

### 3.4.3. Statement of Commitments Non-Compliances

The Site was found to be non-compliant with one (1) Statement of Commitments from the EIS. A summary of this non-compliance is provided below.

**RTS 3.4** states that upon completion of the WTS, the undeveloped RRF area will be grassed until such time as construction can commence on the second stage. The Stage 2 area is not currently grassed and is causing sediment to accumulate at the front of the Site.

### 3.4.4. Environment Protection Licence Non-Compliances

The Site was found to be non-compliant with three (3) EPL conditions. A summary of these non-compliances found for each condition is provided below.

**Condition L1.1** states that except as may be expressly provided in any other condition of this licence, the licensee must comply with Section 120 of the *Protection of the Environment Operations Act 1997*.

**Condition O3.2** states that all vehicles leaving the Premises must not track dirt, sand or other materials onto public roads.

**Condition O3.3** states that the premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.

All three (3) non-compliances are associated with the sediment accumulation that was identified on the hardstand area at the base of the dirt access road to the Stage 2 area refer to photograph in Figure E4 in Appendix E). This accumulated sediment could lead impact on nearby stormwater quality.

A summary of the non-compliance against the SSD 7075 compliance conditions, EIS statement of commitments and EPL 20986 licence conditions are provided in Table 3.1.

**Table 3.1. Summary of the non-compliance against the SSD 7075 compliance conditions, EIS statement of commitments and EPL 20986 licence conditions**

Consent/ SOC/EPL Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A5	The Applicant shall carry out the development of the Waste Transfer Station in accordance with the conditions outlined in Schedule C.	<ul style="list-style-type: none"> <li>The findings of this audit.</li> </ul>	6 Non-compliances were identified against the conditions outlined in Schedule C.	<b>Non-compliant</b>
A9	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the development.	<ul style="list-style-type: none"> <li>The findings of this audit</li> </ul>	6 Non-compliances were identified which would indicate improvements to housekeeping practices are required in respect to measures that may prevent potential off-site impacts from on-site activities.	<b>Non-compliant</b>
A1	The Applicant shall carry out the Development in accordance with the: <ul style="list-style-type: none"> <li>(a) Staged Development Application (SSD 7075);</li> <li>(b) EIS;</li> <li>(c) RTS;</li> <li>(d) Conditions in Schedule B;</li> <li>(e) Site and elevation plans as identified in Appendix 1B and 2;</li> <li>(f) Mod 1;</li> <li>(g) Mod 2;</li> <li>(h) Mod 3;</li> <li>(i) Mod 4;</li> <li>(j) Mod5*; and</li> <li>(k) Management and mitigation measures as identified in Appendix 3.</li> </ul>	<ul style="list-style-type: none"> <li>The findings of this audit</li> </ul>	6 Non-compliances were identified against the conditions outlined in Schedule C.  *Modification 5 was approved in July 2023 and is therefore outside of the current Audit period.	<b>Non-compliant</b>
A3	The Applicant shall comply with any reasonable requirement/s of the Planning Secretary arising from the Department's assessment of: <ul style="list-style-type: none"> <li>(a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent; and</li> <li>(b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.</li> </ul>	<ul style="list-style-type: none"> <li>The findings of this audit</li> </ul>	6 Non-compliances were identified against the conditions outlined in Schedule C.	<b>Non-compliant</b>



Consent/ SOC/EPL Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B4	The premises shall be maintained in a condition that minimises or prevents the emission of dust from the premises.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023): <ul style="list-style-type: none"> <li>Appendix H - Landscape Plan</li> </ul> </li> </ul>	<p>Sediment accumulation was identified on the hardstand area at the base of the dirt access road to the Stage 2 area (refer to photograph in Figure E4 in Appendix E).</p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.</p> <p>Since the previous audit, the landscaping of the grounds has improved. In addition, the street sweeping frequency has increased to daily.</p>	Non-Compliant
B11	The Applicant shall carry out the Development in accordance with the Odour Management Plan approved by the Planning Secretary (as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023): <ul style="list-style-type: none"> <li>Appendix D - Odour Management Plan</li> </ul> </li> </ul>	<p>In accordance with the OMP, there is a protocol for annual monitoring at the WTS in the months of March, April, May, June, and September.</p> <p>Odour monitoring was not undertaken during April 2021 and May 2021.</p> <p>It is noted that this has been addressed via previous correspondence between DPE and Cleanaway.</p>	Non-compliant
B15	The Development shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> , which prohibits the pollution of waters, except as expressly provided in an EPL.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	The Site inspection by the Auditors on 14 September 2023 found a buildup of litter at the tarp-up area of the Waste Transfer Station, potentially impacting on stormwater quality (refer to photograph in Figure E8 in Appendix E).	Non-Compliant
B16	A stormwater management scheme must be prepared for the development and must be implemented in consultation with the EPA. Implementation of the scheme must mitigate the impacts of stormwater run-off from and within the premises following the completion of construction activities. The scheme should be consistent with the Stormwater Management Plan for the catchment.	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023): <ul style="list-style-type: none"> <li>Appendix E - Stormwater Maintenance and Operations Plan</li> </ul> </li> </ul>	Discharges from the bioretention basin during the Audit period were not monitored because of an administrative oversight in subcontractor engagement.	Non-compliant
B20	The Applicant shall implement erosion and sediment control measures on-site in accordance with <i>Managing Urban Stormwater: Soils</i>	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Operational Environmental Management Plan</li> </ul>	Sediment accumulation was identified on the hardstand area at the base of the dirt access road to the Stage 2 area (refer to	Non-Compliant

Consent/ SOC/EPL Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<i>and Construction Vol. 1</i> (Landcom, 2004).	(OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023): ○ Appendix H - Landscape Plan	photograph in Figure E4 in Appendix E).  Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.  Since the previous audit, the landscaping of the grounds has improved. In addition, the street sweeping frequency has increased to daily.	
<b>RTS 3.4</b>	Upon completion of the WTS, the undeveloped RRF area will be grassed until such time as construction can commence on the second stage.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023): ○ Appendix H - Landscape Plan</li> </ul>	<p>Site inspection by the Auditors on 14 September 2023 found that the area of Stage 2 was largely unvegetated and was being used for bin storage.</p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.</p>	<b>Non-Compliant</b>
<b>L1.1</b>	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	The Site inspection by the Auditors on 14 September 2023 found a buildup of litter at the tarp-up area of the Waste Transfer Station, potentially impacting on stormwater quality (refer to photograph in Figure E8 in Appendix E).	<b>Non-Compliant</b>
<b>O3.2</b>	All vehicles leaving the Premises must not track dirt, sand or other materials onto public roads.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	<p>Sediment accumulation was identified on the hardstand area at the base of the dirt access road to the Stage 2 area (refer to photograph in Figure E4 in Appendix E).</p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.</p> <p>All other hardstand areas were free of sediment.</p>	<b>Non-Compliant</b>
<b>O3.3</b>	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer</li> </ul>	Sediment accumulation was identified on the hardstand area at the base of the dirt access road to the Stage 2 area (refer to photograph in Figure E4 in Appendix E).	<b>Non-Compliant</b>

Consent/ SOC/EPL Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
		Station (August 2023): ○ Appendix H - Landscape Plan	Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.  Since the previous audit, the landscaping of the grounds has improved. In addition, the street sweeping frequency has increased daily.	

### 3.4.5. Compliance with Operational Environmental Management Plan

The audit also considered compliance against the sites Operational Environmental Management Plan. The non-compliances are noted in Table 3.2. These non-compliances are consistent with those found under the CoCs, SoCs and the EPL licence conditions.

**Table 3.2. Summary of compliance with Operational Environmental Management Plan.**

Environmental Aspect	Compliance	Applicable Non-compliance Reference(s)
General / Administrative	Non-compliant	<ul style="list-style-type: none"> <li>SSD 7075 CoCs: A5 and A9 (Schedule B)</li> <li>SSD 7075 CoCs: A1 and A3 (Schedule C)</li> </ul>
Air Quality, Odour and Dust	Non-compliant	<ul style="list-style-type: none"> <li>SSD 7075 CoCs: B4 and B11</li> <li>EPL 20986 licence conditions: O3.2 and O3.3</li> </ul>
Traffic and Access	Compliant	
Noise Management	Compliant	
Surface Water	Non-Compliant	<ul style="list-style-type: none"> <li>SSD 7075 CoCs: B15, B16 and B20</li> <li>EPL 20986 licence conditions: L1.1</li> </ul>
Groundwater	Compliant	
Waste Management	Compliant	
Visual Amenity and Landscaping	Non-Compliant	<ul style="list-style-type: none"> <li>EIS SoCs: RTS3.4</li> </ul>
Heritage	Compliant	
Contamination	Compliant	

## 3.5. Previous audit recommendations

A review of the recommended actions from the 2020 Independent Environmental Audit conducted by Jackson Environment and Planning Pty Ltd (report dated 7 September 2020) was carried out during this audit. The findings are presented in Table 3.3.

**Table 3.3. Status of the recommended actions for the observations/non-compliances from the 2020 Independent Environmental Audit and status.**

Item No.	Reference	Observation / Non-compliance	Recommended Action	Status
<b>SSD 7075 Conditions of Consent</b>				
1	Consent Condition B4	Dust Management	<p>Implement a daily inspections schedule to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>Ensure training for employees on general housekeeping responsibilities, and litter and odour management is current.</p>	<p><b>Completed</b></p> <p>The Branch Manager undertakes a daily site walkover and directs sediment to be removed if identified.</p> <p>Sediment issues are discussed during weekly toolbox meetings and monthly workplace meetings.</p> <p>Enviro Sweep was engaged to carry out streetsweeping multiple times per week. As of 2023, Envirosweep has been contracted to conduct daily streetsweeping.</p>
2	Consent Condition B11			
3	Consent Condition B15	Sediment and erosion control	<p>Implement a daily inspections schedule to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>Ensure training for employees on general housekeeping responsibilities, and litter and odour management is current.</p>	<p><b>Completed</b></p> <p>The Branch Manager undertakes a daily site walkover and directs sediment to be removed if identified.</p>

Item No.	Reference	Observation / Non-compliance	Recommended Action	Status
<b>SSD 7075 Conditions of Consent</b>				
4	Consent Condition B20		Implement a programmed maintenance schedule for inspection, monitoring and maintenance of stormwater quality improvement devices installed at the facility to ensure devices are adequately maintained.	<p>Sediment issues are completed during weekly toolbox meetings and monthly workplace meetings.</p> <p>Enviro Sweep was contractor to carry out streetsweeping multiple times per week. As of 2023, Envirosweep has been contracted to conduct daily streetsweeping.</p>
5	Consent Condition B33	Landscaping	Implement post-establishment maintenance program as per the approved Landscape Plan to ensure landscaped areas remain sufficiently vegetated to prevent erosion.	<p><b>Not Completed</b></p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023) to control erosion and sediment generation from the Stage 2 area.</p>
<b>EIS Statement of Commitments</b>				
6	Statement of Commitment 7.4.5	Landscaping	Implement post-establishment maintenance program as per the approved Landscape Plan ensure landscaped areas remain sufficiently vegetated to prevent erosion.	<p><b>Not Completed</b></p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the Operational Environmental Management Plan (OEMP)</p>



Item No.	Reference	Observation / Non-compliance	Recommended Action	Status
<b>SSD 7075 Conditions of Consent</b>				
				Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023) to control erosion and sediment generation from the Stage 2 area.
7	Statement of Commitment 7.6.4	Sediment and erosion control	<p>Implement a daily inspections schedule to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>Ensure training for employees on general housekeeping responsibilities, and litter and odour management is current.</p>	<p><b>Completed</b></p> <p>The Branch Manager undertakes a daily site walkover and directs sediment to be removed if identified.</p> <p>Sediment issues are discussed during weekly toolbox meetings and monthly workplace meetings.</p>
<b>EPL 20986 licence conditions</b>				
8	Condition O3.2 and Condition L1.1	Sediment and erosion control and compliance with section 120 of the <i>Protection of the Environment Operations Act 1997</i>	<p>Update the OEMP and Appendix F (Stormwater Maintenance and Operations Plan) to include procedures for regular sweeping of hardstand areas (e.g. daily) to reduce the potential for stormwater pollutants leaving the site.</p> <p>Implement a daily inspections schedule to check on sediment accumulation on the hardstand, with at least daily sweeping in areas where there is a risk of sediment tracking or accumulation.</p> <p>Establish vegetation in the areas that is consistent with Appendix I (Landscape Plan) of the OEMP to control sediment generation from the Stage 2 area.</p>	<p><b>Not Completed</b></p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023) to control erosion and sediment generation from the Stage 2 area.</p>
9	Condition O3.3			
10	Condition E2.1	Spill management	Ensure training for employees on general housekeeping is current.	<b>Completed</b>

Item No.	Reference	Observation / Non-compliance	Recommended Action	Status
SSD 7075 Conditions of Consent				
				Cleanway undertake regular training for site specific issues (such as asbestos awareness, and Pollution Incident Response Management Plan implementation). Weekly toolbox meetings are also conducted.

### 3.6. EMP, sub-plans and compliance documents

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

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

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

The OEMP includes the following management plans:

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

The objectives of the OEMP are to:

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

The environmental management plans, sub-plans and compliance documents appear to be satisfactory in implementing the conditions of consent as approved under SSD 7075 (as modified).

This audit has identified that there is a lack of implementation of some of the mitigation measures that are proposed in the OEMP and sub plans, particularly around sediment and erosion control and litter management and subsequently surface water management and protection. It is a general recommendation that the OEMP is updated to provide greater focus on sediment and erosion control and litter management at the Site.

## 3.7. Environmental performance

During the on-site audit, evidence suggested that the WTS operations were well managed, with very good control of odour, pests, dust, management of waste, traffic management and emergency management. However, some of the external areas of the operation showed evidence of litter accumulation (though no evidence of litter movement beyond the boundaries), with some residual building waste materials that require clean up.

Maintenance of landscaping around the development appears to have improved since the 2020 Independent Environmental Audit, with previously exposed soil surfaces now covered with grass.

The unsealed road leading into the skip bin storage area of the Site (Stage 2 Area) was observed to be a source of sediment tracking onto hardstand areas at the front of the Site. On windy days, this sediment can contribute to dust generation.

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

The number of complaints received by the facility is considered to be low (four (4) complaints) and has decreased from the nine (9) complaints identified in the 2020 Independent Environmental Audit (refer to Section 3.9). These complaints are all related to odour with only one with the potential to be attributed to the WTS. However, we note that there is a history of odour complaints in the St Clair, Erskine Park and Minchinbury residential communities. Moreover, there are other waste-based facilities within a five (5)-kilometre radius of the Erskine Park Facility that may have the potential to contribute to odour impacts in the St Clair, Erskine Park and Minchinbury residential community.

There have been a number of incidents at the Site with a majority of being from spills and fires (refer to Section 3.10). In relation to the adequacy of the response to these incidents, the Auditors have found that Cleanaway has responded and taken appropriate action and have proactively engaged the NSW EPA to identify potential compliance matters. The systems in place appear to be effective in identifying and managing spills and fires at the Site.

The operation of the facility appeared to be running efficiently and staff members were well trained and experienced.

## 3.8. Consultation outcomes

As part of the audit process, Jackson Environment and Planning Pty Ltd consulted the NSW EPA, Penrith City Council and the NSW Department of Planning and Environment on key environmental issues which need to be considered in the Independent Environmental Audit. The following sections summarises the feedback received from the agencies consulted. Feedback from agencies was requested by 4<sup>th</sup> October 2023.

### 3.8.1. NSW EPA

No comments were received from the NSW EPA. Should feedback be received in future, an addendum to the Audit Report will be prepared.

### 3.8.2. Penrith City Council

No comments were received from the NSW EPA. Should feedback be received in future, an addendum to the Audit Report will be prepared.

### 3.8.3. NSW Department of Planning and Environment

In an email response dated 21<sup>st</sup> September 2023, the NSW Department of Planning and Environment stated that it does not have any specific areas of concern in relation to the project that need to be included within the scope of the audit. However, the NSW Department of Planning and Environment requested that the requirements of the Conditions of Consent and the Independent Audit Post Approval Requirements 2020 (IAPAR) are satisfied in the submission. Specific reference is made to (but not limited to) Section 3.3 of the IAPARs.

## 3.9. Complaints

During the audit period, a total of four (4) complaints were received by the site, all of which were made from a member of the public via the NSW EPA. All complaints received were related to odour. The total number of complaints has dropped slightly from nine (9) that were identified during audit period covered by the 2020 Independent Environmental Audit<sup>3</sup>.

All complaints were closed out with the NSW EPA with consideration to the context of current site operations and meteorological data. It was determined that the odour complaint made on 1 April 2022 may have been from the WTS because of a damaged rapid roller door which was impacted by a vehicle. A replacement side guide assembly was required for the door to be operational which was repaired in May 2022.

**Table 3.4. Summary of complaints received during the Audit Period.**

Date Occurred	Type of complaint	Complaint received by	Outcome
27/08/2021	Odour	Odour complaint from Member of Public (MOP) via NSW EPA	No further action was required as the complaint was determined to be unrelated to the WTS operations based on meteorological conditions.
13/09/2021	Odour	Odour Complaint from MOP via NSW EPA	No further action was required as the complaint was determined to be unrelated to the WTS operations based on meteorological conditions.
01/04/2022	Odour	Odour Complaint from MOP via NSW EPA	It was determined that the odour may have been from the WTS because of a damaged rapid roller door which was impacted by a vehicle. A replacement side guide assembly was required for the door to be operational which was repaired in May 2022.
21/10/2022	Odour	Odour Complaint from MOP via NSW EPA	No further action was required as the complaint was determined to be unrelated to the WTS operations based on meteorological conditions.

<sup>3</sup> 2020 Independent Environmental Audit - Cleanaway Pty Ltd - Erskine Park Waste Transfer Station, Jackson Environment and Planning Pty Ltd, 2020

## 3.10. Incidents

During the Audit period, a total of 19 incidents were recorded in Cleanaway's MyOSH Incident Reporting Register. The majority of incidents were related to spills / leakages (12 incidents) followed by fires (7 incidents).

Of these incidents, all were considered to be insignificant or minor, except for the fire within the Commercial and Industrial (C&I) waste stockpile inside of the Erskine Park Transfer Station which occurred on the 21 June 2021. This was considered a notifiable incident.

On 21 June 2021, Cleanaway self-reported the incident by notifying the NSW EPA via the NSW EPA's Environment Line (REF-NO-3440). On 25 June 2021 the NSW EPA requested a written report in accordance with Condition R3 of the Licence.

On 28 June 2021, Cleanaway provided a written report outlining the details of the incident. The NSW EPA, in a letter response dated 21 July 2021 which stated the NSW EPA was satisfied with the actions taken by the Cleanaway in relation to the incident. The NSW EPA stated that no further action would be taken.

In relation to the adequacy of the response to these incidents, the Auditors have found that Cleanaway has responded and taken appropriate action and have proactively engaged the NSW EPA to identify potential compliance matters.

## 3.11. Actual versus predicted environmental impacts

A summary of the actual environment impacts versus the predicted environmental impacts as documented in the Environmental Impact Statement (EIS)<sup>4</sup> is provided below.

### 3.11.1. Meteorological

No relevant predictions for weather/climate are provided in the EIS.

### 3.11.2. Noise and Vibration

No noise or vibration monitoring was undertaken during the reporting period as this is not required for the Site.

Noise and vibration were kept within reasonable levels at the site by implementing mitigation measures, with no noise or vibration complaints received, and no remedial actions/additional mitigation measures required to be implemented during the Audit period.

### 3.11.3. Air Quality

Odour monitoring was required to be undertaken quarterly during the reporting period in accordance with the OEMP, the OMP and SSD 7075 Conditions B10 and B11. Monthly surveys were also required to be undertaken during Autumn, when there is an inversion layer that increases the potential for odour impacts offsite.

Monitoring was undertaken during the Audit Period with the exception of April 2021 and May 2021.

The EIS stated that with air pollution controls the odour impacts from the WTS will be contained to within the industrial area and avoids impact on residential areas. The odour monitoring determined the WTS did not have any reasonable potential impact to adjacent residential communities of Erskine Park, St Clair and Minchinbury and therefore actual air quality impacts are in accordance with this prediction.

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<sup>4</sup> Erskine Park Resource Management Facility Staged SSD (SSD – 7075) - Concept Plan and Stage 1 Waste Transfer Station - Environmental Impact Statement. SLR Consulting Australia Pty Ltd 2015.



### 3.11.4. Biodiversity

No relevant predictions for pests, vermin nor noxious weeds are provided in the EIS. No complaints related to vermin, pest and noxious weed management were received during the reporting period.

### 3.11.5. Traffic

The EIS predicted that at full operation the total number of inbound vehicles delivering waste to the Erskine Park WRMF would be in the vicinity of 200 per day. The number of outbound waste transfer vehicles from the WTS was estimated at approximately 30 larger vehicles (semi-trailers and B-doubles per day). The actual traffic experienced at the site during the Audit period was less than predicted, as documented below:

- Nov 2019-Oct 2020 - incoming traffic 31.5% and outgoing traffic 78.4% less than that predicted in the EIS;
- Nov 2020-Oct 2021 - incoming traffic 31.0% and outgoing traffic 47.0% less than that predicted in the EIS; and
- Nov 2021-Oct 2022 - incoming traffic 69.0% and outgoing traffic 43.0% less than that predicted in the EIS.

### 3.11.6. Surface water

The EIS predicted there will be no impacts on local water resources including the flow and quality of surface water. The factors which contributed this prediction included:

- Absence of floodable land shown on *Broader Western Sydney Employment Area draft Structure Plan 2013*;
- Water requirements of WTS will be serviced by existing infrastructure;
- Stormwater runoff will be captured by existing bioretention basin which overflows to the Council's stormwater system by an outlet structure;
- The absence of on-site waste disposal or long-term waste stockpiling; and
- No Acid sulphate soils with moderate salinity levels present on-site.

Leachate is managed at the WTS in accordance with the Leachate Management System (Protocol), in accordance with Condition B17 of SSD 7075. Leachate from the WTS operations is transferred to the adjacent leachate treatment plant for treatment. Once treated, the leachate is then discharged into the Sydney Water sewer system in accordance with the existing trade waste discharge agreement. No leachate was sent off-site for treatment during the Audit period. Water quality monitoring of the treated leachate in the LTP is undertaken in accordance with the existing trade waste agreement. However, this is managed by Cleanaway's landfill operations and is therefore outside of the Scope of the Audit.

Water quality monitoring is required during discharge events in accordance with the frequency listed in Table 1 of the Stormwater Management Scheme (SMOP) to verify that the treatment train is working as intended. Water quality data obtained as part of the water monitoring program should be compared to the default trigger values provided in Table 1.

Discharges from the bioretention basin during the Audit period were not monitored because of an administrative oversight in subcontractor engagement. It is understood, that to prevent future reoccurrence, an external consultant has or is to be engaged to ensure monitoring is carried out.

To improve surface water management at the Site a stormwater isolation valve was installed, to act as an emergency stop in the event of a spillage or to contain firewater. This improvement was identified by Cleanaway and was not a requirement of DPE or NSW EPA.

### 3.11.7. Groundwater

The Statement of Commitments in Appendix 3 of SSD 7075 requires a program of groundwater monitoring to be undertaken at the Site. Two of the 13 groundwater bores surrounding the Erskine Park landfill are located within the WTS.

Groundwater quality criteria/limits have not been set for the Site. However, EPL4865 for the Erskine Park landfill sets a detection limit for ammonia (15 mg/L). The ammonia level for the groundwater monitoring bores on the WTS Site were below the EPL 4865 detection limit.

The EIS predicted that the local groundwater was unlikely to be impacted by the Development. The Site performed in accordance with EIS predictions.

### 3.11.8. Summary

The audit evidence suggests that the WTS operations are well managed, with very good control of odour, pests, dust, management of waste, traffic management and emergency management. This would suggest that the mitigation measures in the OEMP are effective in managing the predicted environmental impacts from the EIS. A summary of the actual versus predicted environmental impacts is provided below.

The non-compliances identified in this Audit appear to be a result of implementation as opposed to effectiveness of the OEMP.

As a result, the Site is generally operated in accordance with the Conditions of Consent for SSD 7075 and the conditions of EPL 20986.

## 3.12. Site inspection

A site inspection was conducted on 14<sup>th</sup> September 2023. This inspection was supported by Cleanaway staff. Photographs taken during the site inspection are provided in Appendix E.

## 3.13. Site interviews

A summary of the evidence collected to support the compliance assessment during the interview of Cleanaway staff on 14 September 2023 provided in Section 3 and in Appendix A. It is noted that numerous follow up contact was made with the Cleanaway team post the audit meeting to supply additional records and evidence.

## 3.14. Improvement opportunities

As identified in the 2020 Independent Environmental Audit, one of the main areas for improvement is general housekeeping of the premises, particularly the external areas of the development. This includes dust control and regular cleaning of hardstand areas and cleaning up of spilled waste.

The Auditors recommend Cleanaway investigate options for reducing the amount of waste / litter being tracked outside of the WTS from walking floor trucks. This might include automated systems that removed rubbish from the top of the walking floors before exiting the WTS.

Alternatively, it is recommended that Cleanaway investigate options to reduce the amount of litter that is left at the tarp-up area. This might include:

- Additional covered waste bins for drivers to dispose of waste; or
- Dedicated personnel to attend the tarp-up area full time to collect the waste.

Training for employees on general housekeeping responsibilities, and litter and odour management should be kept current.

The Stage 2 Area needs to be landscaped with grass as required by Landscape Plan of the OEMP to control sediment generation from the Stage 2 Area. This will reduce the amount of sediment tracking on the hardstand area at the front of the Site.

Whilst the landscaping in Stage 2 Area is being established, continue street sweeping and educate the contractor to carry out a more thorough street sweeping, particularly at the base of the unsealed access road to the Stage 2 Area.

### 3.15. Key strengths

Evidence obtained from the document review and the on-site audit suggests that the WTS operations are managed to a high standard with effective controls for odour, management of waste, traffic, spillages and emergencies. Cleanaway staff have an effective document management system and staff appear to be well trained and experienced in the procedures and operations at the Site.

To improve surface water management at the site a stormwater isolation valve was installed, to act as an emergency stop in the event of a spillage or to contain firewater. This improvement was identified by Cleanaway and was not a requirement of DPE or NSW EPA.

## 4. Recommendations

This section provides a summary of the non-compliances and opportunities for improvement as identified during the 2023 Audit. These are presented in Table 4.1.

**Table 4.1. Summary of non-compliances from the current audit, and recommended actions to address the non-compliances. Timeframes that Cleanaway has committed to in addressing these non-compliances are also given.**

Item No.	Reference	Observation / Non-compliance	Recommended Action	Timeframe for completion / implementation	Date completed
<b>SSD 7075 Conditions of Consent</b>					
1	Consent Condition B4	Dust Management	Landscape the Stage 2 Area with grass as required by Landscape Plan of the OEMP to control sediment generation from the Stage 2 Area.	6 Months	
2	Consent Condition B11		Whilst the landscaping in Stage 2 Area is being established, continue street sweeping and education Enviro Sweep contractor to carry out a more thorough streetsweeping particularly at the base of the unsealed access road to the Stage 2 Area.	1 Month	
3	Consent Condition B15	Pollution of Waters	<p>The Auditors recommend Cleanaway investigate options for reducing the amount of waste / litter being tracked outside of the WTS from walking floor trucks. This might include automated systems that removed rubbish from the top of the walking floors before exiting the WTS.</p> <p>Alternatively, it is recommended that Cleanaway investigate options to reduce the amount of litter that is left at the tarp-up area. This might include:</p> <ul style="list-style-type: none"> <li>• Additional covered waste bins for drivers to dispose of waste; or</li> <li>• Dedicated personnel to attend the tarp-up area full time to collect the waste.</li> </ul>	6-12 Months	

Item No.	Reference	Observation / Non-compliance	Recommended Action	Timeframe for completion / implementation	Date completed
<b>SSD 7075 Conditions of Consent</b>					
			Training for employees on general housekeeping responsibilities, and litter and odour management should be kept current.		
4	Consent Condition B16	Stormwater	It is understood, that to prevent future reoccurrence, an external consultant has or is to be engaged to ensure monitoring is carried out.	1 Month	
5	Consent Condition B20	Erosion and Sediment Control	Refer to the Recommended Action under Item No. 3 above.	6-12 Months	
<b>EIS Statement of Commitments</b>					
6	Statement of Commitment RTS 3.4	Landscaping	Refer to the Recommended Action under Item Nos. 1 and 2 above.	6 Months	
<b>EPL 20986 licence conditions</b>					
7	Condition O3.2 Condition O3.3 Condition L1.1	Sediment and erosion control and compliance with section 120 of the <i>Protection of the Environment Operations Act 1997</i>	Refer to the Recommended Action under Item Nos. 1 and 2 above.	6 Months	



## Appendix A – Independent Audit Tables

**Table A.1. Audit table outlining compliance the conditions of consent under State Significant Development 7075 (including Mods 1-4).**

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
SCHEDULE B – PART A CONDITIONS OF CONSENT FOR CONCEPT PROPOSAL (STAGES 1 AND 2)				
	<b>STAGED DEVELOPMENT DESCRIPTION</b>			
A1	Consent is granted to the Concept Proposal as described in: (a) Schedule A; (b) Staged Development Application (SSD 7075); (c) EIS; (d) RTS; (e) Site layout plan as identified in Appendix 1A; (f) Mod 1; (g) Mod 2; (h) Mod 3; (i) Mod 4; (j) MOD 5; and (k) Management and mitigation measures as identified in Appendix 3	<ul style="list-style-type: none"> <li>None</li> </ul>	<p>None</p> <p>Modification 5 was approved in July 2023 and is therefore outside of the current Audit period.</p>	<b>Not Triggered</b>
A2	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	<ul style="list-style-type: none"> <li>The findings of this audit</li> </ul>	None	<b>Not Triggered</b>
	<b>CONSENT LIMITS</b>			
A3	This consent does not permit the construction and operation of the Stage 2 Resource Recovery Facility.	<ul style="list-style-type: none"> <li>The findings of this audit</li> </ul>	None	<b>Not Triggered</b>
A4	All waste received at the Site must enter at the Waste Transfer Station for initial processing. The Waste Transfer Station must not process more than 300,000 tpa of waste (as identified in the EPL), up to 150,000 tpa of this waste may be recycled at the Resource Recovery Facility (Stage 2).	<ul style="list-style-type: none"> <li>Weighbridge records</li> <li>Waste and Resource Reporting Portal Reports</li> </ul>	<p>Total tonnage of waste received for the audit period are summarised below:</p> <ul style="list-style-type: none"> <li>Dec 19-Nov 20: 113,664t</li> <li>Dec 20-Nov 21: 95,331t</li> <li>Dec 21-Nov 22: 107,731t</li> </ul> <p>This data was calculated from the Waste and Resource Reporting Portal Reports</p>	<b>Compliant</b>
A5	The Applicant shall carry out the development of the Waste Transfer Station in accordance with the conditions outlined in Schedule C.	<ul style="list-style-type: none"> <li>The findings of this audit.</li> </ul>	6 non-compliances were identified against the conditions outlined in Schedule C.	<b>Non-compliant</b>

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A5A	The Waste Transfer Station must not process more than 35,000 tpa of glass	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition was introduced in July 2023 and is therefore outside of the current Audit period.	Not Triggered
A5B	No more than 3,000 tonnes of waste must be stored within the Waste Transfer Station at any one time	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition was introduced in July 2023 and is therefore outside of the current Audit period.	Not Triggered
<b>ADMINISTRATIVE CONDITIONS</b>				
<b>Determination of Future Development Applications</b>				
A6	In accordance with section 83B(3) of the EP&A Act, Stage 2 is to be subject of a future development application.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	Not Triggered
A7	The determination of the future development application(s) are to be consistent with the terms of this development consent as described in Schedule A, and subject to the conditions in Schedule B..	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	Not Triggered
A8	As per Clause 2.11 of the <i>State Environmental Planning Policy (Planning Systems) 2021</i> any future development application(s) shall be classified State Significant Development.	<ul style="list-style-type: none"> <li>Audit Interview</li> </ul>	No new Development Applications have been lodged therefore this condition is not relevant to the current Audit period.	Not Triggered
<b>Obligation to Minimise Harm to the Environment</b>				
A9	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the development.	<ul style="list-style-type: none"> <li>The findings of this audit</li> </ul>	6 non-compliances were identified which would indicate improvements to housekeeping practices are required with respect to measures that may prevent potential off-site impacts from on-site activities.	Non-compliant
<b>Statutory Requirements</b>				
A10	The Applicant shall ensure that all licences, permits, and approvals/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals/consents.	<ul style="list-style-type: none"> <li>Audit Interview</li> </ul>	Site is compliant with this condition.	Compliant
<b>Inconsistency between Documents</b>				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A11	If there is any inconsistency between the plans and documentation referred to above, the most recent document shall prevail to the extent of the inconsistency. However, conditions of this consent prevail to the extent of any inconsistency.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	Not Triggered
	<b>Lapsing of Approval</b>			
A12	This consent lapses five years after the date from which it operates, unless the Stage 1 works have physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under Section 95 of the Act.	<ul style="list-style-type: none"> <li>The findings from this audit</li> </ul>	Stage 1 works physically commenced on 01 Nov 2017.	Not Triggered
	<b>Dispute Resolution</b>			
A13	In the event that a dispute arises between the Applicant, Council or a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's determination of any such dispute shall be final and binding on the parties.	<ul style="list-style-type: none"> <li>None</li> </ul>	None	Not Triggered
	<b>Legal Notices</b>			
A14	Any advice or notice to the consent authority shall be served on the Planning Secretary.	<ul style="list-style-type: none"> <li>None</li> </ul>	None	Not Triggered
<b>SCHEDULE C – CONDITIONS OF CONSENT FOR STAGE 1 - WASTE TRANSFER STATION</b>				
<b>PART A ADMINISTRATIVE CONDITIONS</b>				
	<b>DEVELOPMENT IN ACCORDANCE WITH PLANS AND DOCUMENTS</b>			
A1	The Applicant shall carry out the Development in accordance with the: <ul style="list-style-type: none"> <li>(l) Staged Development Application (SSD 7075);</li> <li>(m) EIS;</li> <li>(n) RTS;</li> <li>(o) Conditions in Schedule B;</li> <li>(p) Site and elevation plans as identified in Appendix 1B and 2;</li> <li>(q) Mod 1;</li> <li>(r) Mod 2;</li> <li>(s) Mod 3;</li> <li>(t) Mod 4;</li> <li>(u) Mod5*; and</li> <li>(v) Management and mitigation measures as identified in Appendix 3.</li> </ul>	<ul style="list-style-type: none"> <li>The findings of this audit</li> </ul>	6 non-compliances were identified against the conditions outlined in Schedule C.  *Modification 5 was approved in July 2023 and is therefore outside of the current Audit period.	Non-compliant
A2	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	<ul style="list-style-type: none"> <li>The findings from this audit</li> </ul>	None	Not Triggered

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A3	The Applicant shall comply with any reasonable requirement/s of the Planning Secretary arising from the Department's assessment of: (c) any reports, plans, strategies, programs or correspondence that are submitted in accordance with this consent; and (d) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.	<ul style="list-style-type: none"> <li>The findings of this audit</li> </ul>	6 non-compliances were identified against the conditions outlined in Schedule C.	<b>Non-compliant</b>
	<b>LIMITS OF CONSENT</b>			
	<b>Waste Limits</b>			
A4	The Applicant shall not receive or process on the Site more than 300,000 tonnes of waste per calendar year.	<ul style="list-style-type: none"> <li>Weighbridge records</li> <li>Waste and Resource Reporting Portal Reports for the Audit period.</li> </ul>	Total tonnage of waste received for the audit period are summarised below: <ul style="list-style-type: none"> <li>Dec 19-Nov 20: 113,664t</li> <li>Dec 20-Nov 21: 95,331t</li> <li>Dec 21-Nov 22: 107,731t</li> </ul> This data was calculated from the Waste and Resource Reporting Portal Reports	<b>Compliant</b>
A5	The Applicant must record the amount of waste (in tonnes) received at the Site on a daily basis.	<ul style="list-style-type: none"> <li>Weighbridge records</li> <li>Waste and Resource Reporting Portal Reports for the Audit period.</li> </ul>	Total tonnage of waste received for the audit period are summarised below: <ul style="list-style-type: none"> <li>Dec 19-Nov 20: 113,664t</li> <li>Dec 20-Nov 21: 95,331t</li> <li>Dec 21-Nov 22: 107,731t</li> </ul> This data was calculated from the Waste and Resource Reporting Portal Reports	<b>Compliant</b>

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A5A	The manual sort line approved as part of Mod 3 must only be used to separate general solid waste (non-putrescible).	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	<p>The manual sort line was dismantled and not operational.</p> <p>As of July 2023, this condition was replaced with:</p> <p>“The glass breaking line approved as part of MOD 5 must only be used to separate glass waste permitted to be received within the WTS.”.</p>	<b>Compliant</b>
A5A (Mod 5)	The manual sort line approved as part of Mod 3 must only be used to separate general solid waste (non-putrescible).	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
<b>STAGED SUBMISSION OF PLANS OR PROGRAMS</b>				
A6	With the approval of the Planning Secretary, the Applicant may: <ul style="list-style-type: none"> <li>(a) submit any strategy, plan or program required by this consent on a progressive basis; and/or</li> <li>(b) combine any strategy, plan or program required by this consent.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	None	<b>Not Triggered</b>
A7	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program shall clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined shall be demonstrated.	<ul style="list-style-type: none"> <li>The findings from this audit</li> </ul>	All plans are specific to Stage 1 of the development and this is clearly demonstrated.	<b>Compliant</b>
<b>EVIDENCE OF CONSULTATION</b>				
A8	Where consultation with any public authority is required by the conditions of this consent, the Applicant shall: <ul style="list-style-type: none"> <li>(a) consult with the relevant public authority prior to submitting the required documentation to the Planning Secretary or the PCA for approval, where required;</li> <li>(b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and</li> <li>(c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this development consent.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	None	<b>Not Triggered</b>
<b>METEOROLOGICAL MONITORING</b>				



Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A9	Prior to commencement of operations, the Applicant shall ensure that there is a suitable meteorological station on the Site that complies with the requirements in the latest version of the Approved Methods for Sampling of Air Pollutants in New South Wales. The Applicant shall operate the meteorological station, and maintain continuous, auditable records of meteorological data, for the life of the Development.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Meteorological data</li> </ul>	<p>A suitable meteorological station is operating at the Site.</p> <p>Meteorological data was sighted for the Audit Period.</p>	<b>Compliant</b>
	<b>DEMOLITION</b>			
A10	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: <i>The Demolition of Structures</i> , or its latest version.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
	<b>BUILDING CODE OF AUSTRALIA</b>			
A11	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the Building Code of Australia.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
	<b>OPERATION OF PLANT AND EQUIPMENT</b>			
A12	The Applicant shall ensure that all plant and equipment used for the Development is: <ul style="list-style-type: none"> <li>(a) maintained in a proper and efficient condition; and</li> <li>(b) operated in a proper and efficient manner.</li> </ul>	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Maintenance records</li> </ul>	All plant and equipment appeared to be maintained in a proper and efficient condition and were being operated in a proper and efficient manner.	<b>Compliant</b>
	<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>			
A13	The Applicant shall: <ul style="list-style-type: none"> <li>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the Development; and</li> <li>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the Development.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
<b>PART B ENVIRONMENTAL PERFORMANCE</b>				
	<b>WASTE MANAGEMENT</b>			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B1	The Applicant shall not cause, permit or allow any materials or waste (as defined by the POEO Act) generated outside the Site to be received at the Site for storage, treatment, processing, reprocessing, or disposal on the Site, except as expressly permitted by an EPL.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023):               <ul style="list-style-type: none"> <li>Appendix G – Operational Waste Management Plan</li> </ul> </li> </ul>	<p>Weighbridge operations were observed during the site inspection.</p> <p>Site inspection by the Auditors on 14 September 2023 indicated that was materials being received were General Solid Waste (putrescible and non-putrescible) consistent with Condition L2.1 of EPL 20986.</p> <p>The site effectively operates under the OWMP</p>	<b>Compliant</b>
B2	<p>From the commencement of operation, the Applicant shall implement a Waste Monitoring Program for the Development. The program must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;</li> <li>(b) include suitable provision to monitor the:               <ul style="list-style-type: none"> <li>i. quantity, type and source of waste received on-site; and</li> <li>ii. quantity, type and quality of the outputs produced on-site.</li> </ul> </li> <li>(c) ensure that:               <ul style="list-style-type: none"> <li>i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the Site; and</li> <li>ii. staff receive adequate training in order to be able to recognise, handle and report any hazardous or other prohibited waste, including asbestos.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023):               <ul style="list-style-type: none"> <li>Appendix G – Operational Waste Management Plan</li> </ul> </li> </ul>	The Waste Monitoring Program for the Development is incorporated in the OWMP.	<b>Compliant</b>
	<b>AIR QUALITY</b>			
	<b>Construction Mitigation</b>			
B3	<p>During construction, the Applicant shall ensure that:</p> <ul style="list-style-type: none"> <li>(a) all vehicles on-site do not exceed a speed of 30 kilometres per hour;</li> <li>(b) all loaded construction vehicles entering or leaving the Site have their loads covered; and</li> <li>(c) all construction vehicles leaving the Site are cleaned of dirt, sand and other materials before they leave the Site, to avoid tracking the materials on public roads.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<b>Dust Management</b>			
B4	The premises shall be maintained in a condition that minimises or prevents the emission of dust from the premises.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023):               <ul style="list-style-type: none"> <li>Appendix H - Landscape Plan</li> </ul> </li> </ul>	<p>Sediment accumulation was identified on the hardstand area at the base of the dirt access road to the Stage 2 area (refer to photograph in Figure E4 in Appendix E).</p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.</p> <p>Since the previous audit, the landscaping of the grounds has improved. In addition, the street sweeping frequency has increased daily.</p>	<b>Non-Compliant</b>
B5	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading within the Waste Transfer Station.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	Site inspection by the Auditors on 14 September 2023 found that trucks entering and leaving the facility were covered at all times, except during unloading and loading within the building.	<b>Compliant</b>
	<b>Odour</b>			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B6	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Complaints register</li> </ul>	<p>4 odour complaints received within the audit period</p> <ul style="list-style-type: none"> <li>27/08/2021</li> <li>13/09/2021</li> <li>01/04/2022</li> <li>21/10/2022</li> </ul> <p>All 4 odour complaints were from a member of the public via NSW EPA. It was determined by Cleanaway that no further action was required for 3 of the 4 complaints as the complaints were determined to be unrelated to the WTS operations based on meteorological conditions.</p> <p>It was determined that the odour complaint on 01/04/2022 may have been from the WTS because of a damaged rapid roll door which was impacted by a vehicle. A replacement side guide assembly was required for the door to be operational which was repaired in May 2022.</p> <p>The Auditors have determined that all reasonable measures were implemented to ensure offensive odour were not generated due to activities at the Site.</p>	<b>Compliant</b>

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B7	The Applicant shall ensure that any waste vehicles parked on the Site do not emit offensive odours.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	The Site inspection by the Auditors on 14 September 2023 found that no odour was detectable from any parked waste collection vehicles on the Site.	<b>Compliant</b>
	<b>Air and Odour Emissions Mitigation</b>			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B8	<p>The Applicant shall:</p> <ul style="list-style-type: none"> <li>(a) operate the Development so that air and odour emissions are minimised during all meteorological conditions;</li> <li>(b) implement best management practice, including all reasonable and feasible air and odour emission mitigation measures to minimise emissions from the Development, including but not limited to an Air Pollution Control System comprising of: <ul style="list-style-type: none"> <li>i. a wet scrubber, or an alternative air filtration system, approved by the Planning Secretary, that can achieve an equivalent or better level of odour control to a wet scrubber;</li> <li>ii. dilution stacks;</li> <li>iii. fast acting roller doors;</li> <li>iv. dust suppression through the use of water sprays/misters;</li> </ul> </li> <li>(c) seal on-site surfaces and regularly maintaining them to prevent dust re-entrainment from vehicle movements and other equipment use; and</li> <li>(d) ensure regular maintenance of the air pollution control system.</li> </ul>	<ul style="list-style-type: none"> <li>• Site inspection</li> <li>• Complaints register</li> </ul>	<p>4 odour complaints received within the audit period</p> <ul style="list-style-type: none"> <li>• 27/08/2021</li> <li>• 13/09/2021</li> <li>• 01/04/2022</li> <li>• 21/10/2022</li> </ul> <p>All 4 odour complaints were from a member of the public via NSW EPA. It was determined by Cleanaway that no further action was required for 3 of the 4 complaints as the complaints were determined to be unrelated to the WTS operations based on meteorological conditions.</p> <p>It was determined that the odour complaint on 01/04/2022 may have been from the WTS because of a damaged rapid roll door which was impacted by a vehicle. A replacement side guide assembly was required for the door to be operational which was repaired in May 2022.</p> <p>The Auditors have determined that all reasonable measures were implemented to ensure offensive odour were not generated due to activities at the Site.</p>	<b>Compliant</b>
	<b>Odour Management Plan</b>			



Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B9	Prior to acceptance of any waste at the Waste Transfer Station, the Air Pollution Control System identified in condition B8b) must be installed and operational. The wet scrubber technology or similar must be sized with an appropriate level of contingency to enable the level of control to be able to be scaled up if necessary.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	Site inspection by the Auditors on 14 September 2023 found that no odour was detectable outside the Waste Transfer Station. Evidence suggest mitigation measures in place and the odour control system was performing adequately.	<b>Compliant</b>
B10	<p>Prior to commencement of construction, the Applicant shall prepare an Odour Management Plan to the satisfaction of the Planning Secretary. The Plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitable qualified and experienced person(s) in consultation with the EPA;</li> <li>(b) describe the measures that would be implemented on-site to ensure: <ul style="list-style-type: none"> <li>i. all reasonable and feasible measures are employed to minimise odour emissions, including details of the air pollution control device(s) and all other operational odour mitigation measures;</li> <li>ii. compliance with the relevant conditions of this consent;</li> <li>iii. contingency measures are deployed to minimise impacts should adverse odour emissions occur or appear likely to occur;</li> </ul> </li> <li>(c) include an ongoing monitoring program;</li> <li>(d) include well defined triggers for the deployment of odour mitigation and contingency measures;</li> <li>(e) include a protocol to determine the occurrence of an exceedance of any criteria in the EPL should an exceedance occur; and</li> <li>(f) include contingency measures for design or system failure.</li> </ul>	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023): <ul style="list-style-type: none"> <li>o Appendix D - Odour Management Plan</li> </ul> </li> </ul>	Site inspection by the Auditors on 14 September 2023 found that no odour was detectable outside the Waste Transfer Station. Evidence suggest mitigation measures in place and the odour control system was performing adequately.	<b>Compliant</b>
B11	The Applicant shall carry out the Development in accordance with the Odour Management Plan approved by the Planning Secretary (as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023): <ul style="list-style-type: none"> <li>o Appendix D - Odour Management Plan</li> </ul> </li> </ul>	<p>In accordance with the OMP, there is a protocol for annual monitoring at the WTS in the months of March, April, May, June, and September.</p> <p>Odour monitoring was not undertaken during April 2021 and May 2021.</p>	<b>Non-compliant</b>

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B12	<p>Within 6 months of operation or as otherwise directed by the Planning Secretary, the Applicant shall carry out an Odour Audit of the Development. The timing of the audit shall coincide with the receipt of putrescible waste at the Waste Transfer Station. The audit must:</p> <ul style="list-style-type: none"> <li>(a) be carried out by a suitably qualified and experienced expert whose appointment has been endorsed by the Planning Secretary;</li> <li>(b) audit the Development whilst it is in full operation;</li> <li>(c) include a summary of air and odour emission related complaints and any actions that were carried out to address the complaints;</li> <li>(d) validate the Development against the odour predictions in the RTS;</li> <li>(e) if, as part of the Odour Audit, or as the result of any other odour monitoring, the odour predictions are demonstrated to be inaccurate, initiate an action plan as per B12 (h).</li> <li>(f) if odour complaints are received, the Applicant must review the meteorological data for the Site and the region to establish the likelihood that the source of the odour originated from the Site. If it is likely that the odour originated from the site it must be reported in accordance with condition C6.</li> <li>(g) review design and management practices of the Development against industry best practice for air emissions and odour management; and</li> <li>(h) include an action plan that identifies and prioritises additional air and odour emission mitigation measures that may be necessary to reduce air and odour emissions.</li> </ul> <p><i>Note: the aim of the odour audit is to validate the odour predictions in the RTS and therefore the audit should be conducted when large amounts of putrescible waste are present on the Site.</i></p>	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
B13	Within two months of commissioning this audit, the Applicant shall submit a copy of the audit report to the Planning Secretary, EPA and Penrith City Council, together with its response to any recommendations contained in the audit report.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
B14	The Applicant shall comply with any requirement(s) of the Planning Secretary arising from the Odour Audit.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
<b>Pollution of Waters</b>				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B15	The Development shall comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	The Site inspection by the Auditors on 14 September 2023 found a buildup of litter at the tarp-up area of the Waste Transfer Station, potentially impacting on stormwater quality (refer to photograph in Figure E8 in Appendix E).	<b>Non-Compliant</b>
	<b>Stormwater</b>			
B16	A stormwater management scheme must be prepared for the development and must be implemented in consultation with the EPA. Implementation of the scheme must mitigate the impacts of stormwater run-off from and within the premises following the completion of construction activities. The scheme should be consistent with the Stormwater Management Plan for the catchment.	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023):               <ul style="list-style-type: none"> <li>Appendix E - Stormwater Maintenance and Operations Plan</li> </ul> </li> </ul>	Discharges from the bioretention basin during the Audit period were not monitored because of an administrative oversight in subcontractor engagement.	<b>Non-Compliant</b>
	<b>Leachate Management System</b>			
B17	Prior to operation, the Applicant shall prepare a Leachate Management System for the Site, the system must: <ul style="list-style-type: none"> <li>(a) be designed by a suitably qualified and experienced person(s) in consultation with the EPA;</li> <li>(b) provide a management protocol for leachate (including firewater);</li> <li>(c) control leachate (including firewater) so that it does not mix with any stormwater on the Site; and</li> <li>(d) include water quality monitoring to determine the performance of the leachate management system.</li> </ul>	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023):               <ul style="list-style-type: none"> <li>Appendix F - Leachate Management System</li> </ul> </li> <li>Leachate Management Protocol Erskine Park Transfer Station – Stage 1 (dated June 2020)</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>
B18	The Applicant shall carry out the Development in accordance with the Leachate Management System approved by the Planning Secretary (as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary	<ul style="list-style-type: none"> <li>Leachate Management Protocol Erskine Park Transfer Station – Stage 1 (dated June 2020)</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B19	Should the Waste Transfer Station no longer be able to utilise the adjacent Landfill Leachate Treatment System, no further waste shall be received at the Site until an alternative strategy for leachate management is provided in accordance with Condition B17. The system shall be designed and installed in consultation with the EPA and subject to the Planning Secretary's approval prior to the facility receiving or processing any further waste.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	Not Triggered
	<b>Erosion and Sediment Control</b>			
B20	The Applicant shall implement erosion and sediment control measures on-site in accordance with Managing Urban Stormwater: Soils and Construction Vol. 1 (Landcom, 2004).	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023):               <ul style="list-style-type: none"> <li>Appendix H - Landscape Plan</li> </ul> </li> </ul>	<p>Sediment accumulation was identified on the hardstand area at the base of the dirt access road to the Stage 2 area (refer to photograph in Figure E4 in Appendix E).</p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.</p> <p>Since the previous audit, the landscaping of the grounds has improved. In addition, the street sweeping frequency has increased daily.</p>	Non-Compliant
	<b>Bunding</b>			
B21	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	All chemicals are stored on appropriate self-bunded pallets or within the designated bunded storage area.	Compliant
	<b>Imported Soil</b>			
B22	The Applicant shall: <ul style="list-style-type: none"> <li>(a) ensure that only VENM, or ENM, or other material approved in writing by the EPA is used as fill on the Site;</li> <li>(b) keep accurate records of the volume and type of fill to be used; and</li> <li>(c) make these records available to the Department upon request.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<b>Compliance Certificate</b>			
B23	A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water prior to the commencement of construction.	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023) <ul style="list-style-type: none"> <li>Appendix C – Sydney Water Approvals</li> </ul> </li> </ul>	The Site is compliant with this condition.	<b>Compliant</b>
	<b>Groundwater Interception and Extraction</b>			
B24	The Applicant shall obtain any necessary water related approvals from DPI in the event that groundwater is likely to be intercepted or extracted during construction.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
	<b>CONTAMINATION</b>			
B25	Prior to commencing any excavation works, the Applicant shall prepare a protocol for the management of unexpected contamination finds which details the procedures for testing, classifying, handling, storing and disposing of contaminated water, soils and/or groundwater if encountered in excavations, in particular during excavation of the stormwater detention basin.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
B26	The Applicant shall notify the Department detailing any contamination investigation carried out. This report shall be provided to the Department on completion of construction earthworks.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
	<b>NOISE AND VIBRATION</b>			
	<b>Vibration Criteria</b>			
B27	The Applicant shall ensure that vibration resulting from the Development does not exceed the continuous or impulsive vibration criteria in EPA's Assessing Vibration: A Technical Guideline (February 2006) at residential receivers.	<ul style="list-style-type: none"> <li>Audit interview</li> </ul>	Noise and vibration were kept within reasonable levels at the site by implementing mitigation measures, with no noise or vibration complaints received, and no remedial actions/additional mitigation measures required to be implemented during the Audit period.	<b>Not Triggered</b>
	<b>Construction and Operation Hours</b>			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)																				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																
B28	<p>The Applicant shall comply with the construction and operation hours in Table 3 unless otherwise agreed to in writing by the Planning Secretary.</p> <table><tr><th colspan="3">Table 3: Hours of Construction and Operation</th></tr><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday – Friday</td><td>5 am to 6 pm</td></tr><tr><td>Saturday</td><td>5 am to 5 pm</td></tr><tr><td>Sunday &amp; Public Holidays</td><td>Nil</td></tr><tr><td>Operation</td><td colspan="2">24 hours a day, seven days a week</td></tr></table>	Table 3: Hours of Construction and Operation			Activity	Day	Hours	Construction	Monday – Friday	5 am to 6 pm	Saturday	5 am to 5 pm	Sunday & Public Holidays	Nil	Operation	24 hours a day, seven days a week		<ul style="list-style-type: none"><li>None</li></ul>	<p>This condition is not relevant to the current Audit period.</p>	Not Triggered
Table 3: Hours of Construction and Operation																				
Activity	Day	Hours																		
Construction	Monday – Friday	5 am to 6 pm																		
	Saturday	5 am to 5 pm																		
	Sunday & Public Holidays	Nil																		
Operation	24 hours a day, seven days a week																			
	Noise Mitigation																			
B29	<p>The Applicant shall:</p> <ul style="list-style-type: none"><li>(a) implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development;</li><li>(b) minimise the noise impacts of the Development during adverse meteorological conditions;</li><li>(c) install and implement broadband squawker reversing alarms for all construction vehicles;</li><li>(d) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and</li><li>(e) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.</li></ul>	<ul style="list-style-type: none"><li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li><li>Site inspection</li><li>Complaints register</li></ul>	<p>No noise complaints have been received at the Site during the audit period.</p> <p>Operational noise controls are documented in the Operational Environmental Management Plan (OEMP). Evidence suggests mitigation measures in place for managing noise at the Site are performing adequately.</p>	Compliant																
	TRAFFIC AND ACCESS																			



Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B30	<p>The Applicant shall ensure that:</p> <ul style="list-style-type: none"> <li>(a) a total of 37 car parking spaces, including one disabled car parking space are provided;</li> <li>(b) trucks shall only be parked in the designated truck park areas as identified in Appendix 1B;</li> <li>(c) at least one load compliance inspection parking area is provided;</li> <li>(d) Site access, driveways and parking areas are constructed and maintained in accordance with the latest versions of Australian Standards AS 2890.1, AS 2890.2, AS 2890.6 and AS 1428.1;</li> <li>(e) the swept path of the longest vehicle entering and exiting the Site, as well as manoeuvrability through the Site, is in accordance with AUSTROADS Guide to Road Design;</li> <li>(f) unless such deliveries are via Erskine Park Road, truck deliveries and pickups are scheduled to avoid busy morning and afternoon peak hours;</li> <li>(g) the egress of B-double waste transportation trucks from the Erskine Park Industrial Estate is confined to Lenore Drive/Erskine Park Link Road;</li> <li>(h) the Development does not result in any vehicles parking or queuing on the public road network;</li> <li>(i) all vehicles are wholly contained on-site before being required to stop;</li> <li>(j) all loading and unloading of heavy vehicles occurs inside the Waste Transfer Station;</li> <li>(k) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times;</li> <li>(l) all vehicles enter and leave the Site in a forward direction;</li> <li>(m) signage is installed to ensure traffic from the adjacent landfill provides right-of-way to the Development traffic; and</li> <li>(n) right-of-way signage is installed at accessway road junctions from the adjacent landfill.</li> </ul>	<ul style="list-style-type: none"> <li>• Site inspection</li> </ul>	<p>The Site inspection by the Auditors on 14 September 2023 found that provisions for parking for passenger and heavy vehicles was in accordance approved plans and complied with all other conditions.</p>	<b>Compliant</b>
<b>FIRE MANAGEMENT</b>				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B31	<p>The Applicant shall:</p> <ul style="list-style-type: none"> <li>(a) implement suitable measures to minimise the risk of fire on-site including but not limited to the recommendations in the EIS;</li> <li>(b) extinguish any fires on-site promptly; and</li> <li>(c) maintain adequate fire-fighting capacity on-site.</li> </ul>	<ul style="list-style-type: none"> <li>• Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023): <ul style="list-style-type: none"> <li>○ Appendix E - Stormwater Maintenance and Operations Plan</li> <li>○ Appendix F - Leachate Management System</li> <li>○ Appendix J – Pollution Incident Response Management Plan (PIRMP)</li> </ul> </li> <li>• Audit interview</li> </ul>	<p>The documents provide adequate provisions for firefighting as well as storage of firewater in the event of a fire incident.</p> <p>The evidence suggests that the procedures in place and response by Cleanaway in identifying and responding to fires are adequate.</p>	<b>Compliant</b>
	<b>VISUAL AMENITY</b>			
	<b>Building Materials and Landscaping</b>			
B32	<p>Prior to the commencement of construction, the Applicant shall prepare a Building and Material Schedule and a Landscape Plan for the development to the satisfaction of the Planning Secretary. The Schedule and Plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared in consultation with Council;</li> <li>(b) be consistent with the Penrith City Council Development Control Plan 2014;</li> <li>(c) include a building materials list for the Waste Transfer Station;</li> <li>(d) provide details on boundary fences which shall generally have a maximum height of 2.1 m and have an "open" nature, e.g. decorative metal and coloured dark grey or black, or complement the adjacent fencing type, other than the southern boundary fence which may be higher than 2.1m and impermeable, as agreed with the adjacent property owner; and</li> <li>(e) include details on landscaping, in particular how the area allocated for the Resource Recovery Facility will be grassed and stabilised prior to commencement of operation of the Waste Transfer Station to prevent any run-off and erosion.</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B33	The Applicant shall carry out the Development in accordance with the approved Building and Material Schedule and Landscape Plan (as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	The development in accordance with the approved Building and Material Schedule and Landscape Plan	<b>Compliant</b>
	<b>Lighting</b>			
B34	All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with Australian Standard AS 4282 1997.	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li> </ul>	Site audit noted that external lighting was generally in accordance with Section 4.8 of the OEMP.	<b>Not Triggered</b>
	<b>Signage</b>			
B35	<p>The Applicant shall install any new signage in consultation with Council and shall comply with the State Environmental Planning Policy 64 – Advertising and Signage, as relevant.</p> <p><i>Note: This condition does not apply to signage identified as exempt or complying development in State Environmental Planning Policy (Exempt and Complying Development Codes) 2008.</i></p>	<ul style="list-style-type: none"> <li>Email approval from Penrith City Council.</li> <li>Audit interview</li> </ul>	<p>Penrith City Council approved the proposed signage under SEPP64 on 29/11/18.</p> <p>No new signages has been installed.</p>	<b>Not Triggered</b>
	<b>HERITAGE</b>			
B36	The Applicant shall cease all works on-site in the event that any Aboriginal cultural object(s) or human remains are uncovered. If human remains are uncovered, you must immediately stop work, not further disturb the remains and notify NSW Police. OEH and the Aboriginal community must be contacted if the remains are suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, you must immediately stop work, not further disturb the objects and notify OEH by calling Environment Line on 131 555. Works must not resume in the designated area until the relevant written consent is received from NSW Police and/or OEH. Any Aboriginal objects discovered must be registered on the Aboriginal Heritage Management Information System (AHIMS), in accordance with section 89A of the National Parks and Wildlife Act 1974.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
	<b>SECURITY</b>			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B37	The Applicant shall: (a) install and maintain a perimeter fence and security gates on the Site; and (b) ensure that the security gates on-site are locked whenever the Site is unattended.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	A perimeter security fencing was in place around the entire site. Security gates observed at site entrance.	<b>Compliant</b>
	<b>PEST, VERMIN &amp; NOXIOUS WEED MANAGEMENT</b>			
B38	The Applicant shall: (a) implement suitable measures to manage pests, vermin and declared noxious weeds on-site; and (b) inspect the Site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on-site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in surrounding areas.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	Site inspection by the Auditors on 14 September 2023 found numerous pest and vermin baiting systems in place around and inside the Waste Transfer Station. No pests or vermin were observed either inside of outside of the Waste Transfer Station. An assessment of Noxious weeds was beyond the scope of the audit, though landscaped areas require weeding consistent with the Landscape Plan.	<b>Compliant</b>
<b>PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</b>				
	<b>ENVIRONMENTAL MANAGEMENT</b>			
	<b>Construction Environmental Management Plan</b>			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C1	<p>Prior to the commencement of construction of the Development, the Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Planning Secretary. The Plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s);</li> <li>(b) describe all activities to be undertaken on the Site during construction, including a clear indication of construction stages;</li> <li>(c) identify the statutory approvals that apply to the Development;</li> <li>(d) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management, dust management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment;</li> <li>(e) detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts;</li> <li>(f) describe the roles and responsibilities for all relevant employees involved in construction;</li> <li>(g) include arrangements for community consultation and complaints handling procedures during construction; and</li> <li>(h) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent.</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
C1A	<p>Prior to commencement of extended construction hours approved as part of MOD 4, the Applicant must submit a revised Construction Environmental Management Plan to the satisfaction of the Planning Secretary. The plan must be prepared in consultation with the EPA and detail the environmental management practices and procedures to mitigate construction noise impacts during the out of hours construction periods.</p>	<ul style="list-style-type: none"> <li>• None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
C2	<p>The Applicant shall carry out the development in accordance with the Construction Environmental Management Plan approved by the Planning Secretary (as revised approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary.</p>	<ul style="list-style-type: none"> <li>• None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
<b>Operational Environmental Management Plan</b>				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C3	<p>The Applicant shall prepare an Operational Environmental Management Plan for the Development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s);</li> <li>(b) provide a strategic framework for environmental management of the Development;</li> <li>(c) identify the statutory approvals that apply to the Development;</li> <li>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;</li> <li>(e) describe in detail how the environmental performance of the Development would be monitored and managed; and</li> <li>(f) describe the procedures that would be implemented to:</li> <li>(g) keep the local community and relevant agencies informed about the operation and environmental performance of the Development;</li> <li>(h) receive, handle, respond to, and record complaints;</li> <li>(i) resolve any disputes that may arise;</li> <li>(j) respond to any non-compliance; and</li> <li>(k) respond to emergencies.</li> </ul> <p>The Applicant shall carry out the Development in accordance with the Operational Environmental Management Plan approved by the Planning Secretary (as revised approved by the Planning Secretary from time to time), unless otherwise agreed by the Planning Secretary</p>	<ul style="list-style-type: none"> <li>• Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023).</li> </ul>	<p>The Operational Environmental Management Plan satisfies the requirements of Condition C3. Site is compliant with this condition.</p>	<b>Compliant</b>
	<b>Management Plan Requirements</b>			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C4	<p>The Applicant shall ensure that the environmental management plans/strategies required under this consent are prepared in accordance with any relevant guidelines and include:</p> <ul style="list-style-type: none"> <li>(a) detailed baseline data;</li> <li>(b) a description of: <ul style="list-style-type: none"> <li>i. the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>ii. any relevant limits or performance measures/criteria;</li> <li>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;</li> <li>iv. the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</li> </ul> </li> <li>(c) a program to monitor and report on the: <ul style="list-style-type: none"> <li>i. impacts and environmental performance of the Development;</li> <li>ii. effectiveness of any management measures;</li> <li>iii. a contingency plan to manage any unpredicted impacts and their consequences;</li> <li>iv. a program to investigate and implement ways to improve the environmental performance of the Development over time;</li> </ul> </li> <li>(d) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>i. incidents;</li> <li>ii. complaints;</li> <li>iii. non-compliances with statutory requirements;</li> <li>iv. exceedances of the impact assessment criteria and/or performance criteria; and</li> <li>v. a protocol for periodic review of the plan.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li> </ul>	The management plan satisfy the requirements of Condition C4. Site is compliant with this condition.	<b>Compliant</b>
C5	The Planning Secretary may waive some of the requirements in Condition C4 if they are unnecessary or unwarranted for particular management plans/strategies.	<ul style="list-style-type: none"> <li>• None</li> </ul>	None.	Not Triggered
<b>REPORTING AND AUDIT</b>				
<b>Incident Reporting</b>				

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C6	The Applicant shall notify, at the earliest opportunity, the Planning Secretary and any other relevant agencies including EPA and Penrith City Council of any incident that has caused, or threatens to cause, material harm to the environment or result in offensive odour at sensitive receivers. For any other incident (including complaints) associated with the Development, the Applicant shall notify the Planning Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Planning 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"> <li>Incident register</li> <li>Audit interview</li> </ul>	<p>During the Audit period, a total of 19 incidents were recorded. The majority of incidents were related to spills / leakages (12 incidents) followed by fires (7 incidents).</p> <p>Of these incidents, all were considered to be insignificant or minor, except for the fire within the Commercial and Industrial waste stockpile which occurred on the 21 June 2021. This was considered a notifiable incident and was reported to the NSW EPA.</p> <p>In relation to the adequacy of the response to these incidents, the Auditors have found that Cleanaway has responded and taken appropriate action and have proactively engaged the NSW EPA to identify potential compliance matters</p>	<b>Compliant</b>
	<b>Regular Reporting</b>			
C7	The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	<ul style="list-style-type: none"> <li>Environmental performance data published on the Cleanaway website</li> </ul>	<p>Environmental performance data is located at:</p> <p><a href="https://www.cleanaway.com.au/sustainable-future-hub/earth/environmental-management/">https://www.cleanaway.com.au/sustainable-future-hub/earth/environmental-management/</a></p>	<b>Compliant</b>
	<b>Independent Environmental Audit</b>			



Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C8	<p>Within 1 year of the date of this consent, and every 3 years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:</p> <ul style="list-style-type: none"> <li>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary;</li> <li>(b) led by a suitably qualified auditor, and include experts in fields specified by the Planning Secretary;</li> <li>(c) include consultation with the relevant agencies;</li> <li>(d) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals and relevant EPL/s (including any assessment, plan or program required under the approvals);</li> <li>(e) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</li> <li>(f) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.</li> </ul>	<ul style="list-style-type: none"> <li>• 2020 Independent Environmental Audit report</li> </ul>	<p>This first Independent Environmental Audit of the environmental performance of the development was conducted on 6 April 2020 and covered the period between December 2018 and November 2019.</p> <p>This Independent Environmental Audit covers the period between December 2018 and November 2022.</p>	<b>Compliant</b>
C9	Within three months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant shall submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report			
	<b>Annual Review</b>			

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C10	<p>Within 1 year of the date of this consent, and every year thereafter, the Applicant must review the environmental performance of the Development. This review must:</p> <ul style="list-style-type: none"> <li>(a) describe the activities associated with the Development that were carried out in the previous calendar year, and the activities proposed to be carried out over the next year;</li> <li>(b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of the results against the: <ul style="list-style-type: none"> <li>i. the relevant statutory requirements, limits or performance measures/criteria;</li> <li>ii. requirements of any plan or program required under this consent;</li> <li>iii. the monitoring results of previous years; and</li> <li>iv. the relevant predictions in the EIS;</li> </ul> </li> <li>(c) identify any non-compliance over the previous year, and describe what actions were (or are being) taken to ensure compliance in the upcoming year;</li> <li>(d) identify any trends in the monitoring data over the life of the Development;</li> <li>(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</li> <li>(f) describe what measures will be implemented over the next year to improve the environmental performance of the Development.</li> </ul>	<ul style="list-style-type: none"> <li>• Annual Review Nov 2019-Oct 2020 (dated November 2020)</li> <li>• Annual Review Nov 2020-Oct 2021 (dated July 2022)</li> <li>• Annual Review Nov 2021-Oct 2022 (dated November 2022)</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>
<b>Revision of Strategies, Plans and Programs</b>				
C11	<p>Within 3 months of the submission of an:</p> <ul style="list-style-type: none"> <li>(a) annual review under Condition C10 above;</li> <li>(b) incident report under Condition C6 above;</li> <li>(c) audit under Condition C8 above; or</li> <li>(d) any modification to this consent,</li> </ul> <p>the Applicant shall review, and if necessary, revise, the strategies, plans, and programs required under this consent.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</i></p>	<ul style="list-style-type: none"> <li>• Audit interview</li> </ul>	It is understood strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures.	<b>Compliant</b>

Conditions of Development Consent – SSD 7075 (incorporating MOD 1, 2, 3, 4 and 5)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C12	The Applicant shall ensure that the operation of the Development is undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Planning Secretary (or as revised and approved by the Planning Secretary), unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>
C13	<p>The Applicant shall:</p> <p>(a) make copies of the following publicly available on its website:</p> <ol style="list-style-type: none"> <li>the documents referred to in Condition A1;</li> <li>all current statutory approvals for the Development;</li> <li>all approved strategies, plans and programs required under the conditions of this consent;</li> <li>a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</li> <li>a complaints register, updated on a monthly basis;</li> <li>the annual reviews of the Development;</li> <li>any independent environmental audit of the Development, and the Applicant's response to the recommendations in any audit;</li> <li>any other matter required by the Planning Secretary; and</li> </ol> <p>(b) keep this information up to date.</p>	<ul style="list-style-type: none"> <li>All documents are available on the Cleanaway website</li> </ul>	<p>Documents are available at <a href="https://www.cleanaway.com.au/about-us/environmental-management/">https://www.cleanaway.com.au/about-us/environmental-management/</a>.</p> <p>Site is compliant with this condition.</p>	<b>Compliant</b>

**Table A.2. Audit table outlining compliance the Environment Impact Assessment Statement of Commitments.**

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<b>GENERAL</b>			
7.11.5	A Construction Environmental Management Plan (CEMP) will be prepared for the Development, with sub-plans for specific environmental risk areas, including but not limited to noise, dust and traffic issues.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
7.11.5	A site-specific Operational Environmental Management Plan (OEMP) will be developed and submitted to DP&E for approval. The OEMP will ensure that the commitments made within the EIS, along with the conditions imposed by the development consent and EPL, are fully implemented and complied with. The OEMP will establish the framework for managing and mitigating the potential environmental impacts of the Development over the life of the operation.	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023).</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>
	<b>AIR QUALITY AND ODOUR</b>			
7.1.5	A program of construction air quality monitoring will be implemented.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
7.1.5	<p>An air pollution control system will be implemented to provide multiple levels of control and an integrated solution for emission control. The system will include:</p> <ul style="list-style-type: none"> <li>Containment: containment of dust and odour within the building using fast acting doors and an air extraction system;</li> <li>Internal air management: the installation of a dust suppression system to control internal dust concentrations;</li> <li>Air pollution control: the operation of a wet scrubber, required to achieve the ‘design standard’ with the plant operating at full capacity in the ‘normal operations’ scenario, or during the ‘emergency operations’ scenario; and</li> <li>Emission control: the use of dilution fans to maximise the dispersion and dilution of the extracted, and scrubbed, air.</li> </ul>	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	The Site inspection by the Auditors on 14 September 2023 found that there was no detectable odour outside of the Waste Transfer Station. Evidence suggest mitigation measures in place and the odour control system was performing adequately.	<b>Compliant</b>
7.1.5	Within the first 12 months of operations, monitoring of odour will be undertaken to perform efficiency trials on the scrubber system to demonstrate optimal performance. Cleanaway will also undertake follow-up monitoring during the operational lifetime of the WTS, on a basis to be agreed with the relevant authorities.	<ul style="list-style-type: none"> <li>The Odour Audit was carried out in March 2019 which is not within the current Audit period.</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
	<b>NOISE AND VIBRATION</b>			
-	Other than the noise mitigation achieved by the enclosed nature of the building design, no additional noise mitigation measures are warranted.	<ul style="list-style-type: none"> <li>Noted</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
RTS 3.4	Cleanaway owned vehicles operating on the site will be fitted with the High and Low Buzzer system, designed to minimise noise associated with reversing alarms in accordance with the Australian Vehicle Standard (Australian Design Rule 42/04) and Heavy Vehicle National Law Act 2012.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	<p>The Auditors conducted a site inspection on 14 September 2023 and heavy vehicles were observed entering the Waste Transfer Station during the site visit and reversing alarms were observed during the site inspection.</p> <p>Advice from site management is that all vehicles comply with this requirement.</p>	<b>Compliant</b>
RTS 3.4	All mobile plant operation will occur inside the WTS building and will be fitted with low frequency white noise reversing alarms.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>
<b>TRAFFIC AND TRANSPORT</b>				
7.3.5	The Construction Traffic Management Plan will be updated in response to pre-construction approvals required as part of the Conditions of Approval. This will be implemented for the duration of construction activities.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
7.3.5	Cleanaway will schedule its delivery and transfer trucks to avoid the busy morning and afternoon peak hours.	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li> </ul>	Section 4.3 of the OEMP addresses this requirement and has been sighted by the Auditors.	<b>Compliant</b>
7.3.5	Transfer trucks departing the site will use the Erskine Park Link Road connection to the M7 rather than the Mamre Road or Erskine Park Road routes to the M4.	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li> </ul>	Section 4.3 of the OEMP addresses this requirement and has been sighted by the Auditors.	<b>Compliant</b>
RTS 3.4	Designated pedestrian access will be provided from Quarry Road to the offices.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	Pedestrian access path observed during site inspection.	<b>Compliant</b>
RTS 3.4	Any existing unnecessary property access will be removed, the kerb reinstated to suit the existing kerb, and the verge area reinstated with grass seeded topsoil or turf, which will be addressed in further designed stages.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
<b>VISUAL AMENITY</b>				

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.4.5	Lighting will be designed and installed in accordance with AS 4282- 1997 to avoid obtrusive effects to surrounding residents.	<ul style="list-style-type: none"> <li>None – Site has been constructed and condition has previously been determined as compliant</li> </ul>	This condition is not relevant to the current Audit period as it relates to the construction period.	Not Triggered
7.4.5	Disturbed areas will be rehabilitated on completion of construction.	<ul style="list-style-type: none"> <li>None</li> </ul>	Site is compliant with this condition.	Compliant
7.4.5	Mature trees will be fenced and protected for the duration of construction.	<ul style="list-style-type: none"> <li>None</li> </ul>	Site is compliant with this condition.	Compliant
7.4.5	Landscape works will be implemented as part of the Development.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	The landscaped areas around the facility were suitably vegetated, with no exposed soils or erosion.	Compliant
RTS 3.4	Further detail on the architectural treatment of the facility will be provided as the detailed design progresses.	<ul style="list-style-type: none"> <li>None</li> </ul>	Site is compliant with this condition.	Compliant
RTS 3.4	Black palisade fencing located behind landscaping fronting on to Quarry Road will be provided.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	Site is compliant with this condition.	Compliant
RTS 3.4	Upon completion of the WTS, the undeveloped RRF area will be grassed until such time as construction can commence on the second stage.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)               <ul style="list-style-type: none"> <li>Appendix H - Landscape Plan of the</li> </ul> </li> </ul>	<p>Site inspection by the Auditors on 14 September 2023 found that the area of Stage 2 was largely unvegetated and was being used for bin storage.</p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.</p>	Non-Compliant
	<b>Indigenous Heritage</b>			
7.5.3	Should any Aboriginal artefact be uncovered during construction or operation all works will cease in that locale and the OEH will be notified. Works will only recommence when an appropriate and approved management strategy has been agreed to by all of the relevant stakeholders.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	Not Triggered
	<b>SOILS AND GEOLOGY</b>			
7.6.4	Cut and fill slopes will be battered or retained for stability and to reduce the risk of erosion.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	The landscaped areas around the facility were suitably vegetated, with no exposed soils or erosion.	Compliant

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.6.4	An Erosion and Sediment Control Plan (ESCP) will be prepared as part of the CEMP setting out detailed measures for the management of erosion and sediment.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
7.6.4	A program of groundwater monitoring would be undertaken, building on the ongoing groundwater monitoring program undertaken for the landfill.	<ul style="list-style-type: none"> <li>Groundwater monitoring reports</li> </ul>	<p>Groundwater monitoring reports are located at: <a href="https://www.cleanaway.com.au/about-us/environmental-management/">https://www.cleanaway.com.au/about-us/environmental-management/</a></p> <p>Site is compliant with this condition.</p>	<b>Compliant</b>
7.6.4	<p>In the event that unexpected contaminated material is encountered during construction excavations:</p> <ul style="list-style-type: none"> <li>An environmental management plan will be developed and implemented; and</li> <li>A suitably qualified environmental consultant will be consulted to assess any unexpected conditions or subsurface facilities discovered during the proposed earthworks.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
7.6.4	<p>In the event that salinity is identified during construction the following measures will be considered:</p> <ul style="list-style-type: none"> <li>minimisation of exposure of saline and sodic soils in temporary faces or stockpiles during site preparation works; and</li> <li>the collection and controlled discharge of stormwater from hard surfaces such that the potential for localised ponding or waterlogging is minimised.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
	<b>SURFACE WATER</b>			
7.7.5	An Erosion and Sediment Control Plan (ESCP) will be prepared as part of the CEMP setting out detailed measures for the management of erosion and sediment.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
7.7.5	Storage of hazardous materials during construction such as oils, chemicals and refuelling activities will occur in bunded areas.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
7.7.5	Water quality monitoring of water within the sediment basins will be carried out during the construction phase in accordance with the CEMP.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
7.7.5	A minimum of 740 m <sup>3</sup> of OSD will be provided within an underground tank and above ground storage within the detention basin.	<ul style="list-style-type: none"> <li>Construction Certificate Plans from CIP (OSD Tank and Sections Plan, Plan No. C013523.00-C44; Stormwater Drainage Plan, Plan No. C013523.00-C41) showing total storage of OSD tank and pond to be 710m<sup>3</sup>.</li> <li>Installation Certificate (Clark McKay Pty Ltd, dated 06/12/2018).</li> </ul>	<p>Site is compliant with this condition.</p> <p>Note under the SSD Mod 1 approval, the approved storage was reduced from 740m<sup>3</sup> to 710m<sup>3</sup>.</p>	<b>Compliant</b>
7.7.5	Rainwater harvesting tanks will be implemented, which will provide a minimum of 56 KL of water storage for supplying greywater for toilet flushing in the buildings.	<ul style="list-style-type: none"> <li>Construction Certificate Plans from CIP (OSD Tank and Sections Plan, Plan No. C013523.00-C44; Stormwater Drainage Plan, Plan No. C013523.00-C41) showing total storage of OSD tank and pond to be 710m<sup>3</sup>.</li> <li>Installation Certificate (Clark McKay Pty Ltd, dated 06/12/2018).</li> </ul>	<p>Site is compliant with this condition.</p> <p>Note under the SSD Mod 1 approval, the approved storage was reduced from 740m<sup>3</sup> to 710m<sup>3</sup>.</p>	<b>Compliant</b>
7.7.5	Cleanaway will develop a detailed maintenance and operations plan for the entire stormwater system in accordance with Penrith Councils WSUD Policy (PCC, 2013) and will be included within the OEMP.	<ul style="list-style-type: none"> <li>The Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)               <ul style="list-style-type: none"> <li>Appendix E – Stormwater Maintenance and Operations Plan</li> </ul> </li> </ul>	<p>Site is compliant with this condition.</p>	<b>Compliant</b>
<b>FLORA AND FAUNA</b>				



Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
-	Given the highly disturbed and artificial nature of the subject site at Erskine Park, there is no requirement for the implementation of any species-specific impact amelioration or environment management measures with respect to threatened or other native biota.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	<b>Not Triggered</b>
<b>GREENHOUSE GAS</b>				
7.9.4	The building will be designed to comply with all National Construction Code and Council requirements and a Section J Energy Efficiency Assessment will be performed prior to construction.	<ul style="list-style-type: none"> <li>None – Site has been constructed and condition has previously been determined as compliant</li> </ul>	This condition is not relevant to the current Audit period as it relates to the construction period.	<b>Not Triggered</b>
7.9.4	The following points would be considered to reduce the emissions caused from on-site electricity usage: <ul style="list-style-type: none"> <li>A percentage of electricity could be generated on-site through the use of photovoltaic cells, for example;</li> <li>Use of light sensors minimise lighting related electricity usage; and</li> <li>Where possible, high efficiency lighting should be used.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	<b>Not Triggered</b>
7.9.4	The following points should be considered to reduce the overall energy use from vehicles and stationary equipment: <ul style="list-style-type: none"> <li>Variable frequency drive motor controls will be used on stationary equipment to minimise electricity consumption;</li> <li>Waste transfer vehicles should leave the site with full loads to reduce the number of traffic movements required;</li> <li>Waste transfer vehicle configuration should be designed to maximise waste transport efficiency;</li> <li>All vehicles/plant and machinery should be turned off when not in use and regularly serviced to ensure efficient operation; and</li> <li>Truck routes and loading capacity should be designed and optimised to reduce the distance and effort required by the vehicles.</li> </ul>	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Audit interview</li> <li>The Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>
<b>HAZARDS AND RISK</b>				
-	The SEPP 33 screenings for storage and transportation of dangerous goods indicates that the development is below the SEPP thresholds and therefore is not considered a hazardous or offensive development in accordance with the guidelines. As such a Preliminary Hazard Assessment is not required.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	<b>Not Triggered</b>
<b>SOCIO-ECONOMIC</b>				
7.11.5	A Community Information Strategy will be implemented throughout construction.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	<b>Not Triggered</b>

Environmental Impact Assessment – Management and Mitigation Measures				
EIS Section	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<b>WASTE MANAGEMENT</b>			
6.12	All received waste will be transported off-site to an appropriately licensed waste management facility in accordance with relevant waste management regulations.	<ul style="list-style-type: none"> <li>Audit interview</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>
7.12.4	A Construction Waste Management Plan will be prepared setting out specific measures for the management of waste during the construction period.	<ul style="list-style-type: none"> <li>None – Site has been constructed and condition has previously been determined as compliant</li> </ul>	This condition is not relevant to the current Audit period as it relates to the construction period.	<b>Not Triggered</b>
7.12.4	An operation WMP will be implemented throughout the life of the operation and will be updated on a regular basis (e.g. annually) to ensure the Plan remains applicable.	<ul style="list-style-type: none"> <li>Operational Waste Management Plan (OWMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>

**Table A.3. Audit table outlining compliance the licence conditions under Environment Protection Licence 20986.**

Conditions of EPL 20986 Erskine Park Waste Transfer Station																
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status												
1	Administrative Conditions															
A1	What the licence authorises and regulates															
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table><thead><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr></thead><tbody><tr><td>Chemical storage</td><td>General chemicals storage</td><td>0 - 5000 kL storage capacity</td></tr><tr><td>Waste processing (non-thermal treatment)</td><td>Non-thermal treatment of general waste</td><td>Any annual processing capacity</td></tr><tr><td>Waste storage</td><td>Waste storage - other types of waste</td><td>Any other types of waste stored</td></tr></tbody></table>	Scheduled Activity	Fee Based Activity	Scale	Chemical storage	General chemicals storage	0 - 5000 kL storage capacity	Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity	Waste storage	Waste storage - other types of waste	Any other types of waste stored	<ul style="list-style-type: none"><li>Site Inspection</li></ul>	No other scheduled activities were observed during the site inspection and therefore the Site is compliant with this condition.	Compliant
Scheduled Activity	Fee Based Activity	Scale														
Chemical storage	General chemicals storage	0 - 5000 kL storage capacity														
Waste processing (non-thermal treatment)	Non-thermal treatment of general waste	Any annual processing capacity														
Waste storage	Waste storage - other types of waste	Any other types of waste stored														
A2	Premises or plant to which this licence applies															
A2.1	<p>The licence applies to the following premises: ERSKINE PARK WASTE TRANSFER STATION 85-87 QUARRY ROAD ERSKINE PARK NSW 2759 LOT 1 DP 1140063</p>	<ul style="list-style-type: none"><li>Cleanaway website provides the address of the Site.</li></ul>	The correct address was verified on Cleanaway’s website at: <a href="https://www.cleanaway.com.au/location/erskine-park-transfer-station/">https://www.cleanaway.com.au/location/erskine-park-transfer-station/</a> .	Compliant												
A3	Information supplied to the EPA															
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to:</p> <p>(a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>(b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	<ul style="list-style-type: none"><li>The findings of this audit have determined that the Site is compliant with this condition.</li></ul>	Site is compliant with this condition.	Compliant												
2	Discharges to Air and Water and Applications to Land															

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>P1</b>	<b>Location of monitoring/discharge points and areas</b>			
<b>P1.1</b>	<p>The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</p> <p>(none listed)</p>	<ul style="list-style-type: none"> <li>None</li> </ul>	The condition does not require any action.	<b>Not Triggered</b>
<b>3</b>	<b>Limit Conditions</b>			
<b>L1</b>	<b>Pollution of waters</b>			
<b>L1.1</b>	<p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.</p>	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	<p>The Site inspection by the Auditors on 14 September 2023 found a buildup of litter at the tarp-up area of the Waste Transfer Station, potentially impacting on stormwater quality (refer to photograph in Figure E8 in Appendix E).</p>	<b>Non-Compliant</b>
<b>L2</b>	<b>Waste</b>			

Conditions of EPL 20986 Erskine Park Waste Transfer Station																			
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status															
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below. This condition does not limit any other conditions in this licence.</p> <table border="1"> <thead> <tr> <th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr> </thead> <tbody> <tr> <td>NA</td><td>General solid waste (putrescible)</td><td>As defined in Schedule 1 of the POEO Act, as in force from time to time</td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr> <tr> <td>NA</td><td>General solid waste (non-putrescible)</td><td>As defined in Schedule 1 of the POEO Act, as in force from time to time</td><td>Waste processing (non-thermal treatment) Waste storage</td><td></td></tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Waste processing (non-thermal treatment) Waste storage		NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Waste processing (non-thermal treatment) Waste storage		<ul style="list-style-type: none"> <li>Site inspection</li> <li>Weighbridge records</li> <li>Waste and Resource Reporting Portal Reports</li> </ul>	<p>Total tonnage of waste received for the audit period are summarised below:</p> <ul style="list-style-type: none"> <li>Dec 19-Nov 20: 113,664t</li> <li>Dec 20-Nov 21: 95,331t</li> <li>Dec 21-Nov 22: 107,731t</li> </ul> <p>This data was calculated from the Waste and Resource Reporting Portal Reports.</p> <p>Only those waste types that are permitted to be received at the Site were observed during the Site inspection.</p> <p>The weighbridge records and Waste and Resource Reporting Portal Reports demonstrate that only waste lawfully permitted at the Site were received.</p>	Compliant
Code	Waste	Description	Activity	Other Limits															
NA	General solid waste (putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Waste processing (non-thermal treatment) Waste storage																
NA	General solid waste (non-putrescible)	As defined in Schedule 1 of the POEO Act, as in force from time to time	Waste processing (non-thermal treatment) Waste storage																
L2.2	No more than 300,000 tonnes of waste is to be received at the Premises per annum.	<ul style="list-style-type: none"> <li>Weighbridge records</li> <li>Waste and Resource Reporting Portal Reports</li> </ul>	<p>Total tonnage of waste received for the audit period are summarised below:</p> <ul style="list-style-type: none"> <li>Dec 19-Nov 20: 113,664t</li> <li>Dec 20-Nov 21: 95,331t</li> <li>Dec 21-Nov 22: 107,731t</li> </ul> <p>This data was calculated from the Waste and Resource Reporting Portal Reports</p>	Compliant															
L2.3	The amount of waste received at the Premises must be recorded (in tonnes) on a daily basis.	<ul style="list-style-type: none"> <li>Weighbridge records</li> </ul>	Site is compliant with this condition.	Compliant															

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L2.4	The authorised amount of waste permitted on the Premises must not exceed 1,040 tonnes at any one time	<ul style="list-style-type: none"> <li>• Weighbridge records</li> <li>• Waste and Resource Reporting Portal Reports</li> </ul>	<p>The authorised amount of waste permitted on the Premises exceeded 1,040 tonnes once (1068.63 tonne in February 2020).</p> <p>Given the small discrepancy (&lt;3%) between amount stored on site and the authorised amount, and this is a singular occurrence, the auditors are of the opinion that this is not a regular occurrence and Cleanaway are generally compliant with this condition. It is also acknowledged that the NSW EPA did not identify this as an issue when the Waste and Resource Reporting Portal Report was submitted for February 2020.</p>	<b>Compliant</b>
L3	<b>Noise Limits</b>			
L3.1	Noise emissions from the Premises must be in compliance with the requirements of the NSW EPA's Industrial Noise Policy.	<ul style="list-style-type: none"> <li>• Audit interview</li> <li>• Complaints register</li> </ul>	<p>The EPL does not require monitoring.</p> <p>Noise and vibration were kept within reasonable levels at the site by implementing mitigation measures, with no noise or vibration complaints received, and no remedial actions/additional mitigation measures required to be implemented during the reporting period.</p>	<b>Not Triggered</b>
L4	<b>Hours of Operation</b>			
L4.1	The hours of operation are 24 hours per day seven days a week.	<ul style="list-style-type: none"> <li>• Audit interview</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>
L5	<b>Potentially Offensive Odour</b>			

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L5.1	<p>No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the <i>Protection of the Environment Operations Act 1997</i>.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</p>	<ul style="list-style-type: none"> <li>Complaints register</li> </ul>	<p>4 odour complaints received within the audit period</p> <ul style="list-style-type: none"> <li>27/08/2021</li> <li>13/09/2021</li> <li>01/04/2022</li> <li>21/10/2022</li> </ul> <p>All 4 odour complaints were from a member of the public via NSW EPA. It was determined by Cleanaway that no further action was required for 3 of the 4 complaints as the complaints were determined to be unrelated to the WTS operations based on meteorological conditions.</p> <p>It was determined that the odour complaint on 01/04/2022 may have been from the WTS because of a damaged rapid roller door which was impacted by a vehicle. A replacement side guide assembly was required for the door to be operational which was repaired in May 2022.</p> <p>The Auditors have determined that all reasonable measures were implemented to ensure offensive odour were not generated due to activities at the Site.</p>	Not Triggered
4	Operating Conditions			
O1	Activities must be carried out in a competent manner			

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O1.1	Licensed activities must be carried out in a competent manner. This includes: (a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	<ul style="list-style-type: none"> <li>Site Inspection</li> <li>Audit interview</li> </ul>	Site is compliant with this condition.	<b>Compliant</b>
O2	<b>Maintenance of plant and equipment</b>			
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: (a) must be maintained in a proper and efficient condition; and (b) must be operated proper and efficient manner in a.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Maintenance records</li> </ul>	All plant and equipment appeared to be maintained in a proper and efficient condition and were being operated in a proper and efficient manner.	<b>Compliant</b>
O3	<b>Dust</b>			
O3.1	Trucks entering or leaving the Premises that are carrying loads must be covered, except during loading and unloading.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li> </ul>	<p>Site inspection by the Auditors on 14 September 2023 found that trucks entering and leaving the facility were covered at all times, except during unloading and loading within the building.</p> <p>The OEMP provides operational controls that are to be implemented at the Site to control odours including driver training including covering loads at all times.</p>	<b>Compliant</b>



Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O3.2	All vehicles leaving the Premises must not track dirt, sand or other materials onto public roads.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	<p>Sediment accumulation was identified on the hardstand area at the base of the dirt access road to the Stage 2 area (refer to photograph in Figure E4 in Appendix E).</p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.</p> <p>All other hardstand areas were free of dirt.</p>	<b>Non-Compliant</b>
O3.3	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	<p>Sediment accumulation was identified on the hardstand area at the base of the dirt access road to the Stage 2 area (refer to photograph in Figure E4 in Appendix E).</p> <p>Establishment of grass is required to be consistent with Appendix H - Landscape Plan of the OEMP to control sediment generation from the Stage 2 area.</p> <p>Since the previous audit, the landscaping of the grounds has improved. In addition, the street sweeping frequency has increased daily.</p>	<b>Non-Compliant</b>
O4	Other Operating Conditions			

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O4.1	The licensee must ensure that any waste received and/or stored at the Premises is assessed and classified in accordance with the EPA's Waste Classification Guidelines as in force from time to time.	<ul style="list-style-type: none"> <li>Operational Waste Management Plan (OWMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li> </ul>	<p>A Waste Monitoring Program for the Development is incorporated in the OWMP.</p> <p>Waste is assessed in delivery vehicles that enter the site on the incoming weighbridge located adjacent to the office.</p>	<b>Compliant</b>
5	<b>Monitoring and Recording Conditions</b>			
M1	<b>Monitoring records</b>			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	<ul style="list-style-type: none"> <li>None</li> </ul>	The EPL does not require monitoring.	<b>Not Triggered</b>
M1.2	All records required to be kept by this licence must be: <ul style="list-style-type: none"> <li>(a) in a legible form, or in a form that can readily be reduced to a legible form;</li> <li>(b) kept for at least 4 years after the monitoring or event to which they relate took place; and</li> <li>(c) produced in a legible form to any authorised officer of the EPA who asks to see them.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	The EPL does not require monitoring.	<b>Not Triggered</b>
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: <ul style="list-style-type: none"> <li>(a) the date(s) on which the sample was taken;</li> <li>(b) the time(s) at which the sample was collected;</li> <li>(c) the point at which the sample was taken; and</li> <li>(d) the name of the person who collected the sample.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	The EPL does not require monitoring.	<b>Not Triggered</b>
M2	<b>Weather Monitoring</b>			
M2.1	The Licensee must ensure that there is a suitable meteorological station on the Premises that complies with the requirements in the latest version of the Approved Methods of Sampling of Air Pollutants in New South Wales	<ul style="list-style-type: none"> <li>Site inspection</li> </ul>	A suitable meteorological station is operating at the Site. Meteorological data was sighted to demonstrate that the meteorological station is operating.	<b>Compliant</b>
M2.2	The Licensee must operate the meteorological station and maintain continuous, auditable records of meteorological data.	<ul style="list-style-type: none"> <li>Meteorological data</li> </ul>	Site is compliant with this condition. Meteorological data was sighted to demonstrate that the meteorological station is operating.	<b>Compliant</b>

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
<b>M3</b>	<b>Recording of pollution complaints</b>			
<b>M3.1</b>	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	<ul style="list-style-type: none"> <li>Cleanaway website</li> </ul>	The Complaints Register is published on the site's website at: <a href="https://www.cleanaway.com.au/about-us/environmental-management/">https://www.cleanaway.com.au/about-us/environmental-management/</a>	<b>Compliant</b>
<b>M3.2</b>	The record must include details of the following: <ul style="list-style-type: none"> <li>(a) the date and time of the complaint;</li> <li>(b) the method by which the complaint was made;</li> <li>(c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;</li> <li>(d) the nature of the complaint;</li> <li>(e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</li> <li>(f) if no action was taken by the licensee, the reasons why no action was taken.</li> </ul>	<ul style="list-style-type: none"> <li>Compliant records provided on Cleanaway website</li> </ul>	The Complaints Register is published on the site's website at: <a href="https://www.cleanaway.com.au/about-us/environmental-management/">https://www.cleanaway.com.au/about-us/environmental-management/</a>  Records are compliant with this Condition.	<b>Compliant</b>
<b>M3.3</b>	The record of a complaint must be kept for at least 4 years after the complaint was made.	<ul style="list-style-type: none"> <li>Compliant records provided on Cleanaway website</li> </ul>	The Complaints Register is published on the site's website at: <a href="https://www.cleanaway.com.au/about-us/environmental-management/">https://www.cleanaway.com.au/about-us/environmental-management/</a>  Records are compliant with this Condition.	<b>Compliant</b>
<b>M3.4</b>	The record must be produced to any authorised officer of the EPA who asks to see them.	<ul style="list-style-type: none"> <li>The Cleanaway website</li> </ul>	The Complaints Register is published on the site's website at: <a href="https://www.cleanaway.com.au/about-us/environmental-management/">https://www.cleanaway.com.au/about-us/environmental-management/</a> and is available to any authorised officer of the EPA	<b>Compliant</b>
<b>M4</b>	<b>Telephone complaints line</b>			
<b>M4.1</b>	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	<ul style="list-style-type: none"> <li>Cleanaway website</li> </ul>	The Complaints Register is published on the site's website at: <a href="https://www.cleanaway.com.au/about-us/environmental-management/">https://www.cleanaway.com.au/about-us/environmental-management/</a>	<b>Compliant</b>

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M4.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	<ul style="list-style-type: none"> <li>Cleanaway website</li> </ul>	The Complaints Register is published on the site's website at: <a href="https://www.cleanaway.com.au/about-us/environmental-management/">https://www.cleanaway.com.au/about-us/environmental-management/</a>	<b>Compliant</b>
M4.3	The preceding two conditions do not apply one (1) month after: the date of the issue of this licence.	<ul style="list-style-type: none"> <li>None</li> </ul>	None	<b>Not Triggered</b>
6	<b>Reporting Conditions</b>			
R1	<b>Annual return documents</b>			
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> <li>a Statement of Compliance,</li> <li>a Monitoring and Complaints Summary,</li> <li>a Statement of Compliance - Licence Conditions,</li> <li>a Statement of Compliance - Load based Fee,</li> <li>a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,</li> <li>a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and</li> <li>a Statement of Compliance - Environmental Management Systems and Practices</li> </ol> <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	<ul style="list-style-type: none"> <li>2020 Annual Return</li> <li>2021 Annual Return</li> <li>2022 Annual Return</li> </ul>	The 2020, 2021 and 2022 Annual Returns were lodged with the NSW EPA in accordance with the POEO Public Register.	<b>Compliant</b>
R1.2	<p>An Annual Return must be prepared in respect of each reporting period except as provided below.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p>	<ul style="list-style-type: none"> <li>2020 Annual Return</li> <li>2021 Annual Return</li> <li>2022 Annual Return</li> </ul>	The 2020, 2021 and 2022 Annual Returns were lodged with the NSW EPA in accordance with the POEO Public Register.	<b>Compliant</b>

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.3	Where this licence is transferred from the licensee to a new licensee: (a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and (b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	Not Triggered
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or (b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	Not Triggered
R1.5	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	<ul style="list-style-type: none"> <li>2020 Annual Return</li> <li>2021 Annual Return</li> <li>2022 Annual Return</li> </ul>	<p>The anniversary date for the licence is 18/09 each year. The applicant complied with this requirement for the 2020, 2021 and 2022 Annual Returns.</p> <p>All annual returns were submitted within 60 days after the end of each reporting period.</p>	Compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	<ul style="list-style-type: none"> <li>Audit interview</li> </ul>	Site is compliant with this condition.	Compliant
R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: (a) the licence holder; or (b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	<ul style="list-style-type: none"> <li>2020 Annual Return</li> <li>2021 Annual Return</li> <li>2022 Annual Return</li> </ul>	<p>Site is compliant with this condition.</p> <p>The Statement of Compliance for each Annual; Return has been certified and the Monitoring and Complaints Summary has been signed.</p>	Compliant
R2	Notification of environmental harm			

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R2.1	<p>Notifications must be made by telephoning the Environment Line service on 131 555.</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>	<ul style="list-style-type: none"> <li>Incident Register</li> </ul>	No reportable incidents or exceedances occurred during the reporting period.	<b>Compliant</b>

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	<ul style="list-style-type: none"> <li>Audit interview</li> </ul>	<p>During the Audit period, a total of 19 incidents were recorded in Cleanaway's MyOSH Incident Reporting Register. The majority of incidents were related to spills / leakages (12 incidents) followed by fires (7 incidents).</p> <p>Of these incidents, all were considered to be insignificant or minor, except for the fire within the Commercial and Industrial waste stockpile inside of the Erskine Park Transfer Station which occurred on the 21 June 2021. This was considered a notifiable incident.</p> <p>On 21 June 2021, Cleanaway self-reported the incident by notifying the NSW EPA via the NSW EPA's Environment Line (REF-NO-3440). On 25 June 2021 the NSW EPA requested a written report in accordance with Condition R3 of the Licence.</p> <p>On 28 June 2021, Cleanaway provided a written report outlining the details of the incident. The NSW EPA, in a letter response dated 21 July 2021 which stated the NSW EPA was satisfied with the actions taken by the Cleanaway in relation to the incident. The NSW EPA stated that no further action would be taken.</p>	<b>Compliant</b>

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R3	<b>Written report</b>			
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: (a) where this licence applies to premises, an event has occurred at the premises; or (b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	Not Triggered
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	Not Triggered
R3.3	The request may require a report which includes any or all of the following information: (a) the cause, time and duration of the event; (b) the type, volume and concentration of every pollutant discharged as a result of the event; (c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; (d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; (e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; (f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and (g) any other relevant matters.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	Not Triggered
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	Not Triggered
7	<b>General Conditions</b>			
G1	<b>Copy of licence kept at the premises or plant</b>			



Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
G1.1	A copy of this licence must be kept at the premises to which the licence applies	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Cleanaway website</li> </ul>	<p>Site is compliant with this condition.</p> <p>A copy of this licence is also available on the site's website at: <a href="https://www.cleanaway.com.au/about-us/environmental-management/">https://www.cleanaway.com.au/about-us/environmental-management/</a></p>	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Cleanaway website</li> </ul>	A copy of this licence is available at the Site.	Compliant
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	<ul style="list-style-type: none"> <li>Site inspection</li> <li>Cleanaway website</li> </ul>	A copy of this licence is available at the Site.	Compliant
8	<b>Special Conditions</b>			
E1	<b>Financial assurance</b>			
E1.1	A financial assurance in the form of an unconditional and irrevocable and on demand guarantee from a bank, building society or credit union operating in Australia as "Authorised Deposit-taking Institutions" under the Banking Act 1959 of the Commonwealth of Australia and supervised by the Australian Prudential Regulatory Authority (APRA) must be provided to the EPA by 30 January 2019.	<ul style="list-style-type: none"> <li>The Bank Guarantee for financial assurance in favour of the Environment Protection Authority in the amount of two hundred thousand dollars (\$200,000) was issued in February 2019 and was sighted by the Auditors in a previous audit</li> </ul>	This condition was deemed complaint in a previous audit	Compliant
E1.2	The financial assurance must be in favour of the Environment Protection Authority in the amount of two hundred thousand dollars (\$200,000). The financial assurance is required to secure or guarantee funding for works or programs required by or under this licence. The financial assurance must contain a term that provides that any monies claimed can be paid to the EPA or, at the written direction of the EPA to any other person. The licensee must provide to the EPA, along with the original counterpart guarantees, confirmation in writing that the financial institution providing the guarantees is subject to supervision by APRA.	<ul style="list-style-type: none"> <li>The Bank Guarantee for financial assurance in favour of the Environment Protection Authority in the amount of two hundred thousand dollars (\$200,000) was issued in February 2019 and was sighted by the Auditors in a previous audit</li> </ul>	This condition was deemed complaint in a previous audit	Compliant

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E1.3	The financial assurance must be maintained during the operation of the facility and thereafter until such time as the EPA is satisfied the premises is environmentally secure	<ul style="list-style-type: none"> <li>The Bank Guarantee for financial assurance in favour of the Environment Protection Authority in the amount of two hundred thousand dollars (\$200,000) was issued in February 2019 and was sighted by the Auditors in a previous audit</li> </ul>	This condition was deemed compliant in a previous audit	<b>Compliant</b>
E1.4	The EPA may require an increase in the amount of the financial assurance at any time as a result of reassessment of the total likely costs and expenses of rehabilitation of the premises.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	<b>Not Triggered</b>
E1.5	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	<ul style="list-style-type: none"> <li>None</li> </ul>	None.	<b>Not Triggered</b>
E1.6	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period.	<b>Not Triggered</b>
E2	<b>Environment Obligations of Licensee (Works and Programs)</b>			
E2.1	<p>While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:</p> <ul style="list-style-type: none"> <li>(a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents.</li> <li>(b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA.</li> <li>(c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.</li> </ul>	<ul style="list-style-type: none"> <li>Incident register</li> </ul>	All recorded spills were cleaned up effectively. Evidence suggests mitigation measures in place for managing spills at the Site are performing adequately.	<b>Compliant</b>

Conditions of EPL 20986 Erskine Park Waste Transfer Station				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E2.2	<p>In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee must:</p> <ul style="list-style-type: none"> <li>(a) Make all efforts to contain all fire water on the premises;</li> <li>(b) Make all efforts to control air pollution from the premises;</li> <li>(c) Make all efforts to contain any discharge, spill or run-off from the premises;</li> <li>(d) Make all efforts to prevent flood water entering the premises;</li> <li>(e) Remediate and rehabilitate any exposed areas of soil and/or waste;</li> <li>(f) Lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of;</li> <li>(g) At the request of the EPA, monitor groundwater beneath the premises and its potential to migrate from the premises;</li> <li>(h) At the request of the EPA, monitor surface water leaving the premises; and</li> <li>(i) Ensure the premises is secure</li> </ul>	<ul style="list-style-type: none"> <li>Operational Environmental Management Plan (OEMP) Erskine Park Resource Management Facility Stage 1 – Waste Transfer Station (August 2023)</li> </ul>	The OEMP provides information on incidents management procedures. Evidence suggests procedures in place for incident management at the Site are performing adequately.	<b>Compliant</b>
E2.3	<p>After the licensee's premises cease to be used for the purposes to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:</p> <ul style="list-style-type: none"> <li>(a) Remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and</li> <li>(b) Rehabilitate the premises, including conducting an assessment of the site and if required remediation of any site contamination.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	This condition is not relevant to the current Audit period as the Site is currently operational.	<b>Not Triggered</b>
E3	<b>Post-commissioning Odour Audit</b>			
E3.1	The licensee must carry out an Odour Audit within six (6) months of commencement of operation of the Waste Transfer Station.	<ul style="list-style-type: none"> <li>The Erskine Park Resource Management Facility Waste Transfer Station Odour Audit (Final Report dated July 2019) was previously sighted by the Auditors</li> </ul>	This condition is not relevant to the current Audit period.	<b>Compliant</b>
E3.2	A copy of the audit report from the Odour Audit referred to in condition E3.1 must be submitted to the EPA within two (2) months of commissioning the Odour Audit and must include the Licensee's response to recommendations contained in the audit report.	<ul style="list-style-type: none"> <li>The Erskine Park Resource Management Facility Waste Transfer Station Odour Audit (Final Report dated July 2019) was previously sighted by the Auditors</li> </ul>	This condition is not relevant to the current Audit period.	<b>Compliant</b>

# Appendix B – Planning Secretary Audit Team Agreement

Our ref: SSD-7075-PA-12

Orhan Cambaz  
Snr Environmental Business Partner  
CLEANAWAY PTY LTD  
1A Raffles Glade  
Eastern Creek NSW 2766

23/08/2023

---

Subject: Erskine Park Waste & Resource Management (SSD-7075)

Independent Auditor Endorsement

Dear Mr Cambaz

Reference is made to your post approval request (SSD-7075-PA-12) for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Audit of the Erskine Park Waste & Resource Management Facility (the **development**), submitted as required by Schedule C, Part C, Condition C8 of SSD-7075, as modified (the **consent**) to NSW Department of Planning and Environment (**NSW Planning**) on 18 August 2023.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, and in accordance with Schedule C, Condition C8 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), I endorse the following independent audit team from Jackson Environmental and Planning Pty Ltd:

- Mr Alan Parsons as lead auditor; and
- Mr Rylan Loemker 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 conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the endorsement of the above independent audit team for the project, each respective project approval or consent requires a request for endorsement of the independent auditor or audit team be submitted to NSW Planning, for consideration of the Planning 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.

Should you wish to discuss the matter further, please contact Maria Divis, Senior Compliance Officer on 02 8275 1156 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely

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

Julia Pope  
Team Leader Compliance - Metro  
Compliance

As nominee of the Planning Secretary

## Appendix C – Consultation Letters and Feedback



20 September 2023

Team Leader Compliance  
Metro Projects  
NSW Department of Planning and Environment  
Locked Bag 5022 Parramatta 2124

By email to: [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

To whom it may concern,

***Re: Agency Consultation – Independent Environmental Audit – Cleanaway’s Erskine Park Waste Transfer Station***

Jackson Environment and Planning Pty Ltd has been engaged by Cleanaway Pty Ltd to undertake an Independent Environmental Audit of the Erskine Park Waste Transfer Station, located at 85-87 Quarry Rd, Erskine Park.

The audit is required under Condition C8 of the Development Consent SSD 7075. The audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

Jackson Environment and Planning Pty Ltd conducted the 1<sup>st</sup> year audit which covered the period between December 2018 to November 2019. This Audit will be conducted for the period between December 2019 to November 2022.

As you are aware, the audit team approval was provided by the Department on 23<sup>rd</sup> August 2023.

The objective of the Independent Environmental Audit is to assess the environmental performance of the Site operations between December 2019 to November 2022. The Audit will also review any non-compliances identified in 1st year audit and the actions that have been carried out to resolve these non-compliances with the aim of closing out all non-compliances.

The independent audit will be performed according to the requirements of the NSW Department of Planning and Environment’s *Independent Audit Post Approval Requirements* (May 2020) and ISO 19011:2018 *Guidelines for Auditing Management Systems*.



Under Condition C8 of SSD 7075, we are required to consult relevant agencies on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, we are consulting with the NSW EPA, Penrith City Council and the NSW Department of Planning and Environment.

Jackson Environment and Planning Pty Ltd would like to present the Department with the opportunity to comment on the environmental performance of the Erskine Park Waste Transfer Station, to be reviewed as part of the Independent Environmental Audit of the development.

We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact the undersigned should you need any further information.

Yours sincerely,



**Rylan Loemker** BEnvSc (Hons), GradDipBusTech

Senior Consultant

Jackson Environment and Planning Pty Ltd

Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060

M: 0427 835 607

E: [rylan@jacksonenvironment.com.au](mailto:rylan@jacksonenvironment.com.au)

W: [www.jacksonenvironment.com.au](http://www.jacksonenvironment.com.au)



20 September 2023

Operations Officer  
Waste Compliance Waste and Resource Recovery  
NSW Environment Protection Authority  
PO Box A290  
Sydney South NSW 1232

By email to: [waste.operations@epa.nsw.gov.au](mailto:waste.operations@epa.nsw.gov.au)

To whom it may concern,

***Re: Agency Consultation – Independent Environmental Audit – Cleanaway’s Erskine Park Waste Transfer Station***

Jackson Environment and Planning Pty Ltd has been engaged by Cleanaway Pty Ltd to undertake an Independent Environmental Audit of the Erskine Park Waste Transfer Station, located at 85-87 Quarry Rd, Erskine Park.

The audit is required under Condition C8 of the Development Consent SSD 7075. The audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

Jackson Environment and Planning Pty Ltd conducted the 1<sup>st</sup> year audit which covered the period between December 2018 to November 2019. This Audit will be conducted for the period between December 2019 to November 2022.

Our audit team for this project was approved by the Department of Planning and Environment on 23<sup>rd</sup> August 2023.

The objective of the Independent Environmental Audit is to assess the environmental performance of the Site operations between December 2019 to November 2022. The Audit will also review any non-compliances identified in 1st year audit and the actions that have been carried out to resolve these non-compliances with the aim of closing out all non-compliances.

The independent audit will be performed according to the requirements of the NSW Department of Planning and Environment’s *Independent Audit Post Approval Requirements* (May 2020) and ISO 19011:2018 *Guidelines for Auditing Management Systems*.

Under Condition C8 of SSD 7075, we are required to consult relevant agencies on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, we are consulting the with NSW EPA, Penrith City Council and the NSW Department of Planning and Environment.

Jackson Environment and Planning Pty Ltd would like to present NSW EPA with the opportunity to comment on the environmental performance of the Erskine Park Waste Transfer Station, to be reviewed as part of the Independent Environmental Audit of the development.

We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact the undersigned should you need any further information.

Yours sincerely,



**Rylan Loemker** BEnvSc (Hons), GradDipBusTech

Senior Consultant

Jackson Environment and Planning Pty Ltd

Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060

M: 0427 835 607

E: [rylan@jacksonenvironment.com.au](mailto:rylan@jacksonenvironment.com.au)

W: [www.jacksonenvironment.com.au](http://www.jacksonenvironment.com.au)



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

20 September 2023

Mr Andrew Moore  
General Manager  
Penrith City Council  
PO Box 60  
Penrith NSW 2751

By email to: [council@penrith.city](mailto:council@penrith.city)

Dear Mr Moore,

***Re: Agency Consultation – Independent Environmental Audit – Cleanaway’s Erskine Park Waste Transfer Station***

Jackson Environment and Planning Pty Ltd has been engaged by Cleanaway Pty Ltd to undertake an Independent Environmental Audit of the Erskine Park Waste Transfer Station, located at 85-87 Quarry Rd, Erskine Park.

The audit is required under Condition C8 of the Development Consent SSD 7075. The audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

Jackson Environment and Planning Pty Ltd conducted the 1<sup>st</sup> year audit which covered the period between December 2018 to November 2019. This Audit will be conducted for the period between December 2019 to November 2022.

Our audit team for this project was approved by the Department of Planning and Environment on 23<sup>rd</sup> August 2023.

The objective of the Independent Environmental Audit is to assess the environmental performance of the Site operations between December 2019 to November 2022. The Audit will also review any non-compliances identified in 1st year audit and the actions that have been carried out to resolve these non-compliances with the aim of closing out all non-compliances.

The independent audit will be performed according to the requirements of the NSW Department of Planning and Environment’s *Independent Audit Post Approval Requirements* (May 2020) and ISO 19011:2018 *Guidelines for Auditing Management Systems*.

Under Condition C8 of SSD 7075, we are required to consult relevant agencies on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, we are consulting with the NSW EPA, Penrith City Council and the NSW Department of Planning and Environment.

Jackson Environment and Planning Pty Ltd would like to present Penrith City Council with the opportunity to comment on the environmental performance of the Erskine Park Waste Transfer Station, to be reviewed as part of the Independent Environmental Audit of the development.

We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact the undersigned should you need any further information.

Yours sincerely,



**Rylan Loemker** BEnvSc (Hons), GradDipBusTech

Senior Consultant

Jackson Environment and Planning Pty Ltd

Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060

M: 0427 835 607

E: [rylan@jacksonenvironment.com.au](mailto:rylan@jacksonenvironment.com.au)

W: [www.jacksonenvironment.com.au](http://www.jacksonenvironment.com.au)

## FW: Agency Consultation – 2023 Independent Environmental Audit – Cleanaway's Erskine Park Waste Transfer Station

Maria Divis

Thu 21/9/2023 1:53 PM

To: rylan.jackson@environment.com.au <rylan@jacksonenvironment.com.au>

Cc: Haydn Rossback <Haydn.Rossback@cleanaway.com.au>; Giovanni Ruscio

<Giovanni.Ruscio@cleanaway.com.au>; alan.parsons@arprisk.com.au <alan.parsons@arprisk.com.au>

 1 attachments (249 KB)

JEP Pty Ltd Cleanway Erskine Park Env Compliance Audit\_Letter to DPE - Final.pdf;

Good afternoon Rylan

Thank you for consulting with the Department of Planning and Environment (the **department**) in order to obtain input into the scope of the Independent Environmental Audit (**IEA**), in accordance with the Independent Audit Post Approval Requirements 2020 (**IAPARs**).

The department does not have any specific areas of concern in relation to the project that need to be included within the scope of the audit. However, please ensure that the requirements of the Conditions of Consent and the IAPARs are satisfied in the submission. Specific reference is made to (but not limited to) Section 3.3 of the IAPARs.

It is suggested that you consult with the local Council, the EPA and any other agencies that may be referenced in the Conditions of Consent for SSD 7075.

For further enquiries, please contact me on the below details.

Kind regards,

**Maria Divis**

**Senior Compliance Officer**

Planning & Assessment | Department of Planning and Environment

T 02 8275 1156 | E [Maria.Divis@planning.nsw.gov.au](mailto:Maria.Divis@planning.nsw.gov.au)

Locked Bag 5022 | PARRAMATTA NSW 2124

[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*The Department of Planning and Environment acknowledges that it stands on Aboriginal land.*

*We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

---

**From:** rylan.jackson@environment.com.au <rylan@jacksonenvironment.com.au>

**Sent:** Wednesday, 20 September 2023 1:39 PM

**To:** DPE PSVC Compliance Mailbox <[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)>

**Cc:** Haydn Rossback <[Haydn.Rossback@cleanaway.com.au](mailto:Haydn.Rossback@cleanaway.com.au)>; Giovanni Ruscio <[Giovanni.Ruscio@cleanaway.com.au](mailto:Giovanni.Ruscio@cleanaway.com.au)>; [alan.parsons@arprisk.com.au](mailto:alan.parsons@arprisk.com.au)

**Subject:** Agency Consultation – 2023 Independent Environmental Audit – Cleanaway’s Erskine Park Waste Transfer Station

Attention: Team Leader Compliance

Jackson Environment and Planning Pty Ltd has been engaged by Cleanaway Pty Ltd to undertake an Independent Environmental Audit of the Erskine Park Waste Transfer Station, located at 85-87 Quarry Rd, Erskine Park. The Independent Environmental Audit is required under Condition C8 of the Development Consent SSD 7075. This Audit has been conducted for the period between December 2019 to November 2022.

Under Condition C8 of SSD 7075, we are required to consult relevant agencies on key environmental issues which need to be considered in the Independent Environmental Audit. As part of this process, we are consulting with the NSW EPA, Penrith City Council and the NSW Department of Planning and Environment.

Jackson Environment and Planning Pty Ltd would like to present the Department with the opportunity to comment on the environmental performance of the Erskine Park Waste Transfer Station, to be reviewed as part of the Independent Environmental Audit of the development.

Please find attached a letter provided additional information. We would appreciate your return response within two weeks of the date of this letter.

Please feel free to contact the undersigned should you need any further information.

Regards,

**Rylan Loemker** BEnvSc (Hons), GradDipBusTech

Senior Consultant

Jackson Environment and Planning Pty Ltd

Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060


T: 02 8056 1849 or M: 0427 835 607

E: [rylan@jacksonenvironment.com.au](mailto:rylan@jacksonenvironment.com.au)

W: [www.jacksonenvironment.com.au](http://www.jacksonenvironment.com.au)



## Appendix D – Independent Audit Declaration Form

Project Name	Erskine Park Waste Transfer Station
Consent Number	State Significant Development Consent 7075
Description of Project	Erskine Park Waste Transfer Station
Project Address	85-87 Quarry Rd, Erskine Park NSW
Proponent	Cleanaway Pty Ltd
Title of Audit	2023 Independent Environmental Audit – Erskine Park Waste Transfer Station
Date	10 November 2023
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <li><i>i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);</i></li> <li><i>ii. the findings of the audit are reported truthfully, accurately and completely;</i></li> <li><i>iii. I have exercised due diligence and professional judgement in conducting the audit;</i></li> <li><i>iv. I have acted professionally, objectively and in an unbiased manner;</i></li> <li><i>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;</i></li> <li><i>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;</i></li> <li><i>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</i></li> <li><i>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.</i></li> </ul> <p><b>Note.</b></p> <ul style="list-style-type: none"> <li><i>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</i></li> <li><i>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)</i></li> </ul>	
Name of Auditor	Alan Parsons
Signature	
Qualification	Lead Auditor
Company	Jackson Environment and Planning Pty Ltd
Company Address	1 Power Place, Jindabyne NSW 2627



## Appendix E – Site Visit Photographs

Figure E1. Photograph of the entrance to the WTS.



**Figure E2. Photograph of the inside of the WTS.**





**Figure E3. Photograph showing the three rapid roller doors which are kept closed unless trucks are entering or exiting the WTS.**



**Figure E4. Photograph showing the unsealed access road to the Stage 2 area which is causing sediment to accumulate at the front of the Site.**





Figure E5. Photograph of the bioretention basin.





**Figure E6. Photograph of Site exit showing landscaped slopes and clean hardstand areas.**





**Figure E7. Litter build up along the inside front of the Site which appears to be windblown from the tarp-up area to the east of this area.**





**Figure E8. Photograph of the tarp-up area where drivers remove rubbish from trucks so that the retractable covers will work. The litter is currently placed in the skip bin or left on the ground where it has the potential to become windborne and pollute nearby natural areas and waterways.**





Figure E9. Photograph of the non-conforming waste holding area and bunded storage area.



Figure E10. Photograph of properly stored chemicals on bunded pallets.



## Appendix F – Audit Plan





**SSD Site Audit: Audit Plan and Agenda**  
**Cleanaway Erskine Park Waste Transfer Station**  
**Site address: 85-87 Quarry Road Erskine Park**  
**Date: Thursday 14 September 2023**  
**Time: 10am to 3pm**

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**Introduction to the audit:**

Jackson Environment and Planning Pty Ltd has been engaged by Cleanaway Pty Ltd to undertake an Independent Environmental Audit of the Erskine Park Waste Transfer Station (the Site), located at 85-87 Quarry Road Erskine Park. This audit is required under Condition C8 of the Development Consent (SSD7075). Specifically, condition C8 states:

*C8. Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development...*

Jackson Environment and Planning Pty Ltd conducted the 1<sup>st</sup> year audit which covered the period between December 2018 to November 2019. The second Audit will be conducted for the period between December 2019 to November 2022.

The objective of the Independent Environmental Audit (the Audit) is to assess the environmental performance of the Site operations between December 2019 to November 2022. The Audit will also review any non-compliances identified in 1<sup>st</sup> year audit and the actions that have been carried out to resolve these non-compliances with the aim of closing out all non-compliances.

The audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

The independent audit will be performed in accordance with the NSW Department of Planning and Environment's *Independent Audit - Post Approval Requirements* (May 2020) and *ISO 19011:2018 – Guidelines for Auditing Management Systems*.

The Department of Planning and Environment approved the audit team on 23 August 2023.

**Audit team**

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

Mr Haydn Rossback	Environmental Business Partner –	Cleanaway Pty Ltd
	NSW/ACT	
Giovanni Ruscio	Branch Manager	Cleanaway Pty Ltd
Mr Alan Parsons	Director	ARP Risk Management Solutions Pty Ltd
Mr Rylan Loemker	Senior Consultant	Jackson Environment and Planning Pty Ltd

## **Audit plan**

The audit process outlined in ISO 19011: 2018 *Guidelines for Auditing Management Systems* has been used to inform the development of the audit plan. The audit plan including the audit methodology is summarised in Table 1. Audit activities to be performed on site on Thursday 14<sup>th</sup> September 2023 are noted.

## **Audit Scope and Objectives**

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

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

### **Project implementation phase**

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

### **Documentation**

The scope of the Audit was limited to assessing the environmental performance of the Site in accordance with the conditions of Development Consent SSD 7075 for the period between December 2019 to November 2022. The scope of the audit included an assessment of the following matters:

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

The audit will include all development modifications applicable to the Site.

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

### **Spatial Scope**

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

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

Status	Audit plan task
Approval	<b>Letter seeking audit team approval</b> – In accordance with the NSW Department of Planning and Environment's <i>Independent Audit Post Approval Requirements</i> (May, 2020) JEP have prepared a letter for you to insert onto your letterhead to seek DPE approval of our audit team. This included the CV's of the audit team to assist in this process.
Prepared (this Audit Plan)	<b>Develop the Audit Plan</b> – An audit plan (this letter) has been developed outlining what will be audited, who will do the auditing, when it will happen, who will be audited, and how much time will be dedicated to each process in the audit. Work will also be assigned to auditors. The audit working papers will also be prepared to identify what the auditors want to verify, what questions to ask, and what they expect as evidence. The Audit Plan also includes the audit sequence. JEP have also allowed time for consultation with relevant agencies, including NSW EPA, Department of Planning and Environment and Penrith City Council in accordance with your consent and the <i>Independent Audit Post Approval Requirements</i> (May, 2020).
Scheduled for 14 September 2023	<p><b>Conduct the opening meeting</b> – The onsite audit begins with an opening meeting. This is to introduce the auditors, confirm the scope and extent of the audit and discuss the schedule.</p> <p><b>Review documents</b> – After the meeting, any documents immediately presented by Cleanaway will be reviewed to gather relevant information that might not have been available before.</p> <p><b>Carry out the audit</b> – The auditors will commence the audit by interviews and collecting the records and observations that will demonstrate if the processes meet the Development Consent conditions and EPL requirements. We will also write to NSW EPA, Department of Planning and Environment and Penrith City Council and seek any feedback on the environmental performance of the development.</p> <p><b>Generate findings and conclusions</b> – The auditors will generate the audit findings and prepare any audit conclusions to be presented at the closing meeting.</p> <p><b>Conduct the closing meeting</b> – The onsite audit finishes with a closing meeting. This is to present the audit findings and provide Cleanaway with the opportunity to discuss and ask questions about the audit and findings.</p>
Approx 2 weeks after site audit	<b>Formalise audit findings in a report</b> – The final findings will be formally written and distributed in an audit report. The report will be provided within two (2) weeks of the on-site audit.

An agenda for delivery of the on-site audit on 14 September 2023 is given in Table 2.

**Table 2. Agenda for the on-site audit scheduled for Thursday 14<sup>th</sup> September 2023.**

Agenda item	Item description
1.	1000 - 1015: Introductions (all)
2.	1015 - 1030: Confirm scope of the audit (Rylan/Alan)
3.	1033 - 1100: Overview of the Audit Plan (Rylan) <ul style="list-style-type: none"><li>• Documents reviewed as part of the desktop audit</li><li>• Review of gaps in audit data / evidence needed</li><li>• Complaints data</li><li>• Timeline for providing audit data</li><li>• Site inductions and familiarization walk through</li><li>• Detailed site inspection of operations</li><li>• Post walk through discussion and additional evidence to be provided</li><li>• Timeline for preparation of draft and final report for submission to DPE</li></ul>
4.	1100 - 1130: Site inductions and familiarisation walk through (all)
5.	1130 - 1300: Audit of site operations (audit team to split up and to be accompanied by a Cleanaway member of staff): <ul style="list-style-type: none"><li>• Environmental monitoring and reporting (Alan)</li><li>• Community liaison and complaints handling (Alan)</li><li>• Training, induction, communications and roles / responsibilities under the OEMP (Alan)</li><li>• Waste Management and waste handling (Rylan)</li><li>• Odour management (Rylan)</li><li>• Dust management (Rylan)</li><li>• Traffic management (Rylan)</li><li>• Stormwater management (Rylan)</li><li>• Vermin and pest control (Rylan)</li><li>• Site contamination management (Rylan)</li><li>• Incident response (Rylan)</li><li>• Noise management (Rylan)</li><li>• Operational Contingency Management (Alan)</li></ul>
6.	1300 - 1330: Lunch and auditor discussion of initial findings (audit team only)
7.	1330 - 1430: Review of audit findings and additional evidence required to complete audit.
8.	1430 - 1500: Questions and close