

Prepared by SUEZ Recycling & Recovery Australia

Lucas Heights Resource Recovery Park

SSD 6835 Independent Environmental Audit Action Plan

July 2021



SUEZ Resource and Recovery

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AECOM Australia undertook an Independent Environmental Audit of the Lucas Heights Resource Recovery Park (LHRRP) on the 4th and 5th of May 2021.

The site is operated by SUEZ and the below contains the actions to be taken, following the audit report.

Summary of Recommendations relating to management plans and site observations

SUEZ comment on Summary:

The OEMP, AQOPM, GMP and CTMP are to be revised, updated and submitted to Sutherland Shire Council (SSC) and/or the DPIE accordingly. The below recommendations will be considered during the review.

Table 8-1

Summary of report recommendations

Source	#	Recommendation / Opportunity for Improvement
Site observation	2021 IEA REC 01	Review incident categorisation and ensure incidents are appropriately categorised to reflect their severity.
Site observation	2021 IEA REC 02	Implement weed control in areas that border established vegetation.
Site observation	2021 IEA REC 03	Ensure spill kits are restocked after use.
Site observation	2021 IEA REC 04	Review liquid storage at the Select Civil Workshop area and ensure adequate bunding is provided
Operational Environmental Management Plan	2021 IEA REC 05	<p>It is recommended that the OEMP is revised to consider the following:</p> <ul style="list-style-type: none"> Update the OEMP to reflect EPL tip face requirements relating to the prepared surface, stripped back area and active tip face Update OEMP to make it clearer within the OEMP that it also incorporates the requirements of Condition D1 for a CEMP for the works associated with reprofiling, stripping and landfilling on top of existing waste and seek Department approval of this approach Update the OEMP to identify that the new GO Facility and ARRT Facility have not begun construction and that prior to their operation, the OEMP would be updated or a separate OEMP(s) prepared. The OEMP currently states that these OEMPs have been prepared Include a section within the OEMP that states that the OEMP has been prepared to address the requirements of SSD 6835, Condition D4, D5 and D7, and identify where in the plan each requirement has been addressed

Source	#	Recommendation / Opportunity for Improvement
		<ul style="list-style-type: none"> Conduct a review to ensure appendices referred to in the text of the document are up to date and appended to the OEMP Attach the AQOMP and GMP as an appendix to the OEMP, as required under SSD 6835, Condition D5 Update Section 8.8 Noise Control to include a plan showing noise monitoring locations <p>Update Section 9.9 to reflect that the Landfill Gas Monitoring Program is no longer in Draft.</p>
Air Quality and Odour Management Plan	2021 IEA REC 06	AQOMP to be updated to include a reference to SSD 6835, Condition D8 which includes a number of triggers for updating the strategies, plans and programs required under SSD 6835.
Air Quality and Odour Management Plan	2021 IEA REC 07	Update AQOMP in accordance with Condition 11A and submit to DPIE.
Groundwater Management Plan	2021 IEA REC 08	Update Section 1.1 to include reference to where in the GMP each requirement has been addressed. In addition, include reference to CoC D8 which includes a number of triggers for updating the strategies, plans and programs required under SSD 6835.
Groundwater Management Plan	2021 IEA REC 09	Resolve issue over requirement for a Water Access Licence and obtain DPIE approval of GMP.
Dual Gas and Leachate Construction Environmental Management Plan	2021 IEA REC 10	Retain records including completed checklists and photographs as a record of CEMP implementation.
Go Facility Construction Traffic Management Plan	2021 IEA REC 11	Update Construction Traffic Management Plan meet the requirements of Condition C48 and to reflect that consultation with SSC and TfNSW occurred. Resubmit to the Department prior to commencement of construction of the GO Facility.

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

Title Condition Number	Auditors Recommendations	Action Required	Date Required
SSD 6835, B6	2021 IEA REC 12 Implement processes to periodically review / track the cumulative quantity of waste received throughout the calendar year to ensure tonnages prescribed in CoC B6 are not exceeded	The amount of waste received at the drop off area to be reviewed/tracked monthly.	Implemented and Ongoing
SSD 6835, B10	2021 IEA REC 13 Implement recommendations in the BCA Advice report prepared by Concise Certification, dated 2 June 2021	Obtain BCA certification	By end of August 2021
SSD 6835, C8	No recommendations required		
SSD 6835, C11A	2021 IEA REC 14 Update AQOMP in accordance with Condition 11A and submit to DPIE	Update AQOMP	By end of September 2021
SSD 6835, C36	2021 IEA REC 15 Obtain DPIE approval of alternative bore locations	To submit consent modification	By end of October 2021
SSD 6835, C37	2021 IEA REC 04 Review liquid storage at the Select Civil Workshop area and ensure adequate bunding is provided	To review liquid storage at the workshop	By end of August 2021
SSD 6835, C49	2021 IEA REC 16 Obtain TfNSW (RMS) approval of the Intersection Safety Review for 2020	To submit request to TfNSW	Request submitted
SSD 6835, D8	2021 IEA REC 17 Implement a process to ensure management plans are reviewed (and revised if necessary) following a reportable incident, Annual Review and/or Modification to the consent. Ensure the review	To implement a process for the review of management plans	By end of September 2021

Title Condition Number	Auditors Recommendations	Action Required	Date Required
	process is documented, in particular where plans are reviewed but do not require revision.		
SSD 6835, D10	2021 IEA REC 18 Implement a process to ensure the Department is notified immediately of any exceedance of trigger values or limits	To notify DPIE immediately for any exceedance of trigger values and limits	Ongoing
SSD 6835, D12	2021 IEA REC 19 Ensure IEAs are conducted within 3 years	To conduct IEAs every 3 years	Ongoing
SSD 6835, D15	2021 IEA REC 20 Ensure all of the documents required by Condition D15 are uploaded onto the SUEZ website	To upload all documents to SUEZ website	Ongoing

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

SUEZ comment on Table 8.3:

The OEMP, ERP and AEMR are to be revised, updated and submitted to Sutherland Shire Council (SSC) and/or the DPIE accordingly. The below recommendations will be considered during the review.

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



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