

9 April 2021



Department of Planning and Environment

By upload to the Major Project Portal

ABN 40 000 805 425

3 Grant Street Cleveland QLD 4163
PO Box 235 Cleveland QLD 4163

T 07 3488 9600 F 07 3488 9681

hseq@jjswaste.com.au
www.jjswaste.com.au

Dear Sir/Madam,

JJ's Waste & Recycling – Development Consent SSD 6767 – Independent Environmental Audit

Please find enclosed the completed independent environmental audit reports as required by Condition 9 and 10 of Development Consent SSD 6767 ('the Reports').

If you have any questions, or would like to discuss this matter further, please do not hesitate to contact me on 0478 323 176 or via email at hseq@jjswaste.com.au.

Yours Sincerely,
JJ's Waste & Recycling

A handwritten signature in black ink that reads 'Amiee Hanna'.

Amiee Hanna
Lawyer



JACKSON
ENVIRONMENT AND PLANNING
STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT



**2021 Independent Environmental Audit
J.J. Richards & Sons Pty Ltd
Glendenning Liquid Waste Facility
14 Rayben Street, Glendenning NSW**

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

The 2021 Independent Environmental Audit Report has been prepared by the following Staff / Contractors of Jackson Environment and Planning Pty Ltd, Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060:

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

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

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

We declare that:

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

Report version	Authors	Date	Reviewer	Approved for issue	Date
Draft	R. Loemker, Dr M. Jackson, A. Parsons	23/03/21	A. Parsons	Dr. M. Jackson	24/03/21
Final	R. Loemker, Dr M. Jackson, A. Parsons	09/04/21	A. Parsons	Dr. M. Jackson	09/04/21

Executive Summary

This report presents the findings of an Independent Environmental Audit that was conducted to assess the environmental performance of J.J. Richards & Sons Pty Ltd's Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning NSW.

The audit was conducted by Jackson Environment and Planning Pty Ltd in March 2021, as required under Condition C9 of the Development Consent (SSD 6767). The scope of the Audit was limited to the period between 15th June 2018 and 11th January 2021 which is consistent with Condition C9, with the audit being commissioned within three years after the first audit in year one.

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

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

- Modification 1 (Mod 1) – Increase in the processing capacity of used oil/industrial oily water (J100 and J120 wastes) from 10,000 tonnes per calendar year to 20,000 tonnes per calendar year; and
- Modification 2 (Mod 2) – Removal of processing limits for individual waste types.

The audit also included the environmental performance requirements under Environmental Protection Licence (21053) for the same period.

NSW Environment Protection Authority, NSW Department of Planning, Industry and Environment, NSW Department of Primary Industries, Transport for NSW, Sydney Water and Blacktown City Council have also been consulted on the environmental performance of the development.

Overall, JJ Richards operates the development in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development.

No non-compliances were identified for the Audit Period. No complaints or environment incidents were recorded during the Audit Period.

The Audit Team found that the Site is operated by JJ Richards to a high standard. All procedures relating to the operation of the development are effectively implemented.

CONTENTS

Executive Summary	3
1. Introduction	6
1.1. Background	6
1.1.1. Site changes and upgrades	7
1.2. Audit team	7
1.3. Audit objectives	7
1.4. Audit scope	8
1.4.1. Project implementation phase.....	8
1.4.2. Spatial scope	8
1.5. Audit period	8
2. Audit methodology	10
2.1. Selection and endorsement of audit team	10
2.2. Independent audit scope development.....	10
2.3. Compliance evaluation.....	10
2.4. Site interviews.....	10
2.5. Site inspection.....	11
2.6. Consultation.....	11
2.7. Compliance status descriptors.....	11
3. Audit findings	12
3.1. Approval and document list.....	12
3.1.1. Operation Environmental Management Plan.....	12
3.2. Compliance performance.....	13
3.3. Summary of agency notices, orders, penalty notices or prosecutions.....	13
3.4. Non-compliances	13
3.5. Previous audit recommendations.....	13
3.5.1. Compliance with Operational Environmental Management Plan	13
3.5.1. Compliance with Environment Protection Licence 21053.....	13
3.6. Overview of environmental performance	14
3.6.1. Consultation outcomes	15
3.6.2. Complaints	15
3.6.3. Incidents.....	15
3.6.4. Actual verses predicted environmental impacts	15
3.6.5. Site inspection.....	15
3.6.6. Site interviews.....	15

4. Recommendations	16
4.1. Opportunities for improvement	16
5. Conclusions	17
Appendix A – Independent Audit Declaration Form.....	18
Appendix B – Audit Team Approval	19
Appendix C – Audit Plan.....	20
Appendix D – Development Consent Compliance Table	21
Appendix E – Environment Protection Licence 20986.....	52
Appendix F – Site inspection photographs (taken on 11 th March 2020)	74
Appendix G – Consultation Letters	81

1. Introduction

This report presents the findings of the Independent Environmental Audit (the Audit) conducted by Jackson Environment and Planning Pty Ltd (JEP) in March 2021. J.J. Richards & Sons Pty Ltd (JJ Richards) commissioned JEP to conduct the Audit and assess the environmental performance of the Glendenning Liquid Waste Facility (LWF), located at 7 Rayben St, Glendenning NSW for the period between 15th June 2018 and 11th January 2021.

On 11th January 2021, the Department of Planning, Industry and Environment approved the audit team to undertake the audit (refer to Appendix B).

1.1. Background

Operating under State Significant Development Consent SSD 6767 and Modifications 1 and 2 for the audit period and Environment Protection Licence (EPL) No. 21053, the Site is approved to receive up to 62,000 tonnes of liquid waste per calendar year comprising liquid organic waste (K110 and K120 wastes) and used oil/industrial oil water (J110 and J120 wastes). The LWF can store up to 1,212 tonnes of liquid waste at any one point in time.

The Glendenning LWF has consent to operate between 4am and 9pm Monday to Saturday. The general processes at the Glendenning WTS include:

- Storing and treating grease trap waste that is liquid waste (K110 type waste) as defined in the *Protection of the Environment Operation Act 1997* (NSW) ('the POEO Act'). The treatment generally involves separating liquids from solids and discharging treated liquids as trade waste to Sydney Water's sewer system (Sydney Water Corporation Consent No. 39115). The resultant solids or sludge are then transported for beneficial reuse in the cultivation of feed crops for cattle on farms in the Sydney region under the *JJ Richards Glendenning Treated Grease Trap Waste Order and Exemption 2018* and currently the *JJ Richards Glendenning and Hume Treated Grease Trap Waste Order and Exemption 2020* under Part 9, Clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014* ('the Regulation');
- Storing food waste that is liquid waste (K120 type waste) as defined in the POEO Act for aggregation and transport for beneficial reuse in the cultivation of feed crops for cattle on farms in the Sydney region under the *Liquid Food Waste Order and Exemption 2014* under Part 9, Clauses 91 and 92 of the Regulation. However, this part of the operation has not commenced;
- Storing used oil for resource recovery, aggregation and transport to re-refining and other appropriately licensed facilities for treatment;
- Storing and treating industrial oily water (J120 type waste - waste oil / hydrocarbons mixtures / emulsions in water). However, this part of the operation has not commenced. Loading and unloading areas have bunding and in ground sumps for spill control. Equipment for unloading, treatment, storing and loading of liquid grease trap and food waste is located within the Organic Waste Building.

The bunded tank farm within this building is provided with spill protection for the following equipment:

- Solids strainer;
- Pump;
- Tanks;
- Carbon filter;
- Dissolved Air Flotation (DAF) unit and enclosure; and
- Associated pipework and valves.

Equipment for unloading, treatment, storing and loading of used oil and J120 industrial oily water, is located within the Used Oil Roof Structure. The bunded tank farm within this structure is provided with spill protection for the following equipment:

- Strainer;
- Pumps;
- Tanks; and
- Associated pipework and valves

1.1.1. Site changes and upgrades

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

- Modification 1 (Mod 1) – Increase in the processing capacity of used oil/industrial oily water (J100 and J120 wastes) from 10,000 tonnes per calendar year to 20,000 tonnes per calendar year; and
- Modification 2 (Mod 2) – Removal of processing limits for individual waste types.

1.2. Audit team

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

1.3. Audit objectives

As required under Condition C9 of the Development Consent (SSD 6767), an Independent Environmental Audit report is to be submitted to the Department of Planning, Industry and Environment. Specifically, Condition C9 states:

Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs or agrees otherwise, the Applicant shall 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) be led by a suitably qualified auditor, and include experts in fields specified by the Secretary;*
- (c) include consultation with the relevant agencies;*
- (d) include a full odour audit of the Development, taking into consideration the relevant technical guidelines and any odour complaints made since the previous audit;*
- (e) 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);*
- (f) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and*
- (g) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents.*

Condition C10 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.

The objective of this Audit is to obtain an independent and objective assessment of the environmental performance and compliance status of the project and comply with Condition C9 of the Development Consent (SSD 6767).

1.4. Audit scope

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

- Project implementation phase; and
- Spatial Scope.

1.4.1. Project implementation phase

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

1.4.2. Spatial scope

The Glendenning LWF as located at 14 Rayben Street, Glendenning NSW entirely within Lot 123, DP870988 (refer to Figure 1.1) which defines the spatial scope of the Audit.

1.5. Audit period

This Audit assesses the environmental performance of the Glendenning LWF for the period between 15th June 2018 and 11th January 2021.

Figure 1.1. Spatial scope of the 2021 Independent Environmental Audit – JJ Richard’s Glendenning Liquid Waste Facility (site boundaries are shown in blue).



Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd Strategy Infrastructure Compliance Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	 JACKSON ENVIRONMENT AND PLANNING STRATEGY INFRASTRUCTURE COMPLIANCE PROCUREMENT	Client	JJ Richards & Sons Pty Ltd
12/03/2021	Revision A	R. Loemker	14 Rayben Street, Glendenning NSW			Project	Glendenning Liquid Waste Facility
						Title	Spatial Scope of audit
						Scale	As shown
						Source	Nearmap

2. Audit methodology

2.1. Selection and endorsement of audit team

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

In accordance with Condition C9 of SSD 6767 and Section 3 of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements (2018)* (the Independent Audit Requirements), JJ Richards presented the Audit Team to the Department of Planning, Industry and Environment and sought approval for the team put forward.

Approval for the independent audit team was provided to JJ Richards on 11th January 2021. The letter of approval is provided in Appendix B.

2.2. Independent audit scope development

The Independent Environmental Audit was developed 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 between 15th June 2018 and 11th January 2021 were requested;
- **Document review** – Received documentation was reviewed for the purpose of developing the Audit plan;
- **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 JJ Richards were reviewed to gather relevant information that might not have been available beforehand. The auditors then commenced the Audit by interviews and collecting the records / observations that demonstrated whether the processes meet the Development Consent conditions and EPL requirements. Audit findings and any audit conclusions were presented at the closing meeting; and
- **Audit Report (this report)** – The final findings will be formally written and distributed in an audit report.

The audit plan is shown in in Appendix C.

2.3. Compliance evaluation

Compliance checklists were developed based on the Conditions of Consent for SSD 6767, the conditions of EPL 21053 and in accordance with the *Independent Audit Guideline* and ISO 19011 *Guidelines for Auditing Management Systems (2018)*. The detailed list of compliance conditions is provided in Appendix D (SSD 6767 CoCs) and Appendix E (EPL 21053 licence conditions). The compliance assessment summary is provided in the Section 3.

2.4. Site interviews

Compliance was also determined via interviews with key staff during the site inspection carried out on the 11th March 2021. Interviewees included Amiee Hanna (Lawyer), Monique Bachtis (Operations Supervisor – Liquid) and Susan Lyell (Regional Manager – NSW/ACT Liquid Infrastructure).

2.5. Site inspection

The auditors attended a site inspection on the 11th March 2021. Photos taken during the site inspection are provided in Appendix F.

2.6. Consultation

As part of the audit process, Jackson Environment and Planning consulted the NSW Environment Protection Authority, NSW Department of Planning, Industry and Environment, NSW Department of Primary Industries, Transport for NSW, Sydney Water and Blacktown City Council on key environmental issues which need to be considered in the Independent Environmental Audit. Letters were sent to each agency providing opportunity to provide feedback. The letters are contained within Appendix G.

2.7. Compliance status descriptors

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

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

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

3. Audit findings

3.1. Approval and document list

The scope of the Audit was limited to assessing the environmental performance of the Site in accordance the conditions of Development Consent SSD 6767 for the period between 15th June 2018 and 11th January 2021.

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

- Modification 1 (Mod 1) – Increase in the processing capacity of used oil/industrial oily water (J100 and J120 wastes) from 10,000 tonnes per calendar year to 20,000 tonnes per calendar year; and
- Modification 2 (Mod 2) – Removal of processing limits for individual waste types.

Other documentation included:

- Operation Environmental Management Plan;
- Environment Protection Licence 21053;
- Tank Farm Manual;
- Waste Inventory Spreadsheet;
- Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115.3.A;
- Meteorological station data;
- Site checklist;
- Complaints register;
- Annual Review 2018 dated 10 January 2019;
- Annual Review 2019 dated 10 January 2020;
- Annual Review 2020 dated 11 January 2021;
- Pollution Incident Response Management Plan;
- Post Commissioning Odour Audit was prepared by Air Noise Environment dated 27 September 2018; and
- Independent Environmental Audit Report Glendenning Liquid Waste Treatment Facility by Mark Rigby & Associates Pty Ltd dated June 2018.

3.1.1. Operation Environmental Management Plan

JJ Richards 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).

The OEMP provides sufficient detail for the effective management of environmental measures for the following environmental aspects as examples of content:

- Incident management;
- Air management (odour and dust);
- Noise management;
- Spill management;
- Stormwater management;
- Traffic management; and
- Waste Monitoring Program.

The objective of the OEMP is to summarise the policies, procedures and documents from the JJ Richards Integrated Management System (IMS) used to ensure compliance with legislative requirements.

3.2. Compliance performance

Overall, JJ Richards operates the development in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development.

No non-compliances were identified for the Audit Period.

The Audit Team found that the Site is operated by JJ Richards to a high standard. All procedures relating to the operation of the development are effectively implemented.

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

There have been no agency notices, orders, penalty notices or prosecutions issued to the facility.

3.4. Non-compliances

No non-compliances were identified against the Conditions of Consent for SSD 6767 for the Audit Period.

3.5. Previous audit recommendations

Three (3) non-compliances were documented in the Independent Environmental Audit conducted by Mark Rigby & Associates Pty Ltd in 2018. Recommendations following these non-compliances included:

- Make details of the 2018 Annual Environmental Management Report public via JJ Richards website and/or consider review of Section 28.5 and/or consider the need for inclusion of this requirement;
- Ensure that future Independent Environmental Audits are undertaken in timeframes nominated in Condition C9 and suggest the Annual Planner for the site be updated to include the Independent Environmental Audit as task at 3-year intervals; and
- Ensure that future Annual Reviews are undertaken in timeframes nominated in Condition C11 and suggest the Annual Planner for the site be updated to include the Annual Review as tasks at 1-year intervals.

It is understood that the above recommendations have been implemented and the subsequent non-compliances have been closed out.

3.5.1. Compliance with Operational Environmental Management Plan

The Audit Team found that the Site is operated in accordance with the Operational Environmental Management Plan and subplans for the Audit Period and no non-compliances were identified.

3.5.1. Compliance with Environment Protection Licence 21053

The Audit Team found that the Site is operated in accordance with the conditions of EPL 21053 for the Audit Period and no non-compliances were identified (refer to Appendix E).

3.6. Overview of environmental performance

Evidence obtained from the document review and the on-site audit suggests that the Glendenning LWF operations are managed to a high standard with effective controls for odour, management of waste, traffic, spillages and emergencies.

During the on-site audit, there were no visible signs of waste outside of the tanks and there was no evidence of spillages. No spillages were observed during the loading and unloading activities during the on-site audit. Spill kits are readily available and well maintained should spillages occur, however, all unloading and loading of vehicles is conducted in bunded, undercover or enclosed areas.

The bunds around tanks within the Organic Waste Building and under the Used Oil Roof Structure are structurally intact and well maintained. All hoses used onsite to transfer liquid products were confirmed to comply with the relevant testing standard (pressure and electrical continuity) for this equipment.

Maintenance of landscaping around the development appeared to be sufficient, with no exposed soil surfaces that could generate sediment on to hardstand areas. No litter was identified during the on-site audit.

Housekeeping at the Glendenning LWF operations would be considered best practice which is further supported by having received no complaints and there being no environment incidents recorded during the Audit Period.

It was noted that the current manual maintenance system is soon to be upgraded to a 'server-based system' as part of the sites continuous improvement program.

Treated grease trap waste is disposed of to sewer under Sydney Waste Corporation's Consent to Discharge Industrial Trade Wastewater 39115.3.A (Activity Grease Trap Waste Disposal) dated 6th February 2019. JJ Richards is required to undertake collection and analysis of samples in accordance with the schedule detailed in the Consent to Discharge. Treated grease trap is to be tested for Ammonia (As N); Biochemical Oxygen Demand; Suspended Solids; Total Dissolved Solids (TDS); Grease; Nitrogen and Phosphorus. The Consent to Discharge specifies acceptance standards that must be met prior to discharge of the treated grease trap waste to sewer.

During the audit period, the Site exceeded the discharge limit for TDS on 12th January 2021. Limits for Ammonia and Maximum daily mass were exceeded on 1st February 2021 based on an advisory letter provided by Sydney Water (dated 1st March 2021). However, JJ Richards provided a copy of their trade waste test report for 1st February 2021 to the audit team which showed that Ammonia levels were in fact compliant and were within trade waste limits.

Since the receipt of the letter from Sydney Water, TDS and Maximum daily mass results have returned to normal. JJ Richards have confirmed they are continuing to work with Sydney Water on this matter to ensure trade waste discharged is compliant at all times.

Condition B4 of the Development Consent states that JJ Richards shall dispose of all outputs produced on site to a suitably licensed facility or to sewer as Trade Waste.

Therefore, JJ Richards is compliant with Condition B4, however it is recommended that JJ Richards continue their investigations and review of the cause of the exceedances and work with Sydney Water to resolve the issue. JJ Richards have other means of lawful disposal of liquid waste should the liquid waste continue to exceed acceptance standard in the Consent to Discharge. Any liquid waste and/or treated grease trap must be disposed of lawfully as approved for application to land under the POEO Act and the Waste Regulation.

Overall, the operation of the facility appears to be running efficiently and staff members were well trained and experienced. Document control systems have also been effectively implemented ensuring employees have access to all relevant plans and procedures. Training is provided to staff in a structured and thorough manner and is well documented.

3.6.1. Consultation outcomes

As part of the audit process, Jackson Environment and Planning consulted the NSW Environment Protection Authority, NSW Department of Planning, Industry and Environment, NSW Department of Primary Industries, Transport for NSW, Sydney Water and Blacktown City Council on key environmental issues which need to be considered in the Independent Environmental Audit.

Transport for NSW responded on 6th April 2021 to advise they have no comments. No other feedback has been received to date. Should feedback be received in future, an addendum to the Audit Report will be prepared.

3.6.2. Complaints

No complaints were received during for the Audit Period.

3.6.3. Incidents

There were no environmental incidents recorded for the Audit Period.

3.6.4. Actual verses predicted environmental impacts

The site is operated in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. There have been no incidents and no complaints have been received. Therefore, the predicted impacts are being managed effectively.

3.6.5. Site inspection

The site inspection identified no environmental issues at the site. The site is operated by JJ Richards to a high standard.

3.6.6. Site interviews

The site interviews identified that employees and managers have a good understanding of the site conditions of consent and Environment Protection Licence conditions.

4. Recommendations

4.1. Opportunities for improvement

JJ Richards is committed to continuous improvement. Areas where improvements are being made were highlighted by JJ Richards. These are summarised below:

- A National Manager – Hydrocarbons and Hazardous Waste is building a team of engineers to develop system / procedural improvements across its facilities including Glendenning. Two chemists and a chemical engineer currently support the Hydrocarbons and Hazardous Waste department in addition to the corporate safety and environmental departments. Management is currently reviewing the OEMP to ensure the mitigation measures and procedures remain relevant and effective;
- Rolling out new signage with an emphasis on site safety and environmental compliance particularly traffic control and spill / emergency management; and
- The maintenance system is to be upgraded to a server-based computer system.

5. Conclusions

An Independent Environmental Audit was conducted to assess the environmental performance of JJ Richards's Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning NSW.

The audit was conducted by Jackson Environment and Planning Pty Ltd in March 2021, as required under Condition C9 of the Development Consent (SSD 6767). The scope of the Audit was limited to the period between period between 15th June 2018 and 11th January 2021. The audit was conducted in accordance with the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018).

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

- Modification 1 (Mod 1) – Increase in the processing capacity of used oil/industrial oily water (J100 and J120 wastes) from 10,000 tonnes per calendar year to 20,000 tonnes per calendar year; and
- Modification 2 (Mod 2) – Removal of processing limits for individual waste types.


The audit also included an assessment of compliance with management plans in place and the environmental performance requirements under Environmental Protection Licence (21053) for the same period.

Overall, JJ Richards operates the development in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development.

No non-compliances were identified for the Audit Period. No complaints or environment incidents were recorded during the Audit Period.

The Audit Team found that the Site is operated by JJ Richards to a high standard. All procedures relating to the operation of the development are effectively implemented.

Appendix A – Independent Audit Declaration Form

Project Name	Glendenning Liquid Waste Facility
Consent Number	State Significant Development Consent 6767
Description of Project	Glendenning Liquid Waste Facility
Project Address	14 Rayben Street, Glendenning, NSW
Proponent	JJ Richards and Sons Pty Ltd
Title of Audit	2021 Independent Environmental Audit – Glendenning Liquid Waste Facility
Date	9 th April 2021
<p>I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:</p> <ul style="list-style-type: none"> – the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2018); – the findings of the audit are reported truthfully, accurately and completely; – I have exercised due diligence and professional judgement in conducting the audit; – I have acted professionally, objectively and in an unbiased manner; – 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 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; – 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 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. <p>Note.</p> <p>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</p> <p>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)</p>	
Name of Auditor	Alan Parsons
Signature	
Qualification	Lead Auditor HSEQ
Company	ARP Risk Management Solutions Pty Ltd
Company Address	1 Power Place, Jindabyne NSW 2627

Appendix B – Audit Team Approval



JJ's Waste & Recycling Pty Ltd
3 Grant St
Cleveland QLD 4163

Contact: Alfarid Hussain
Phone: (02) 9274 6456
Email: compliance@planning.nsw.gov.au

11 January 2020

Attention: Amiee Hanna

Email: Amiee.Hanna@jjwaste.com.au

Dear Ms Hanna

Agreement of Independent Auditor

Glendenning Liquid Waste Treatment Facility – SSD 6767

I refer to your letter dated 3 December 2020 seeking the agreement of the Secretary of the Department of Planning, Industry and Environment (**Department**) of a suitably qualified, experienced and independent audit team to undertake the 2021 operational independent environmental audit of Glendenning Liquid Waste Treatment Facility at 14 Rayben Street Glendenning NSW 2761.

In accordance with Schedule B, Condition C9 of SSD 6767, as modified (**Consent**), the Secretary has agreed to the following audit team:

1. Mark Jackson, Director, Jackson Environment and Planning Pty Ltd as lead auditor;
2. Ryan Loemker, Senior Consultant, Jackson Environment and Planning Pty Ltd as assistant auditor;
3. Alan Parsons, Managing Director, ARP Risk Management Solutions Pty Ltd as assistant auditor; and
4. Samuel Wong, Air Noise Environment Pty Ltd as the air quality expert.

Note that this approval is subject to the independence of the audit team from the project.

Please ensure this correspondence is appended to the Independent Audit Report. Statements of independence must be provided in the Independent Audit Report for each member in the audit team in accordance with Appendix A of the *Independent Audit Post Approval Requirements* (Department, May 2020) (**IAPAR**).

The Independent Audit must be prepared, undertaken and finalised in accordance with the requirements of Schedule B, Condition C9 of the Consent. The Department also recommends consideration be given to the IAPAR to the extent that it does not contradict Schedule B, Condition C9 of the Consent. Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits.

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

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Pope', written in a cursive style.

Julia Pope
Team Leader Compliance Metro
As nominee of the Secretary

Appendix C – Audit Plan



SSD Independent Environmental Audit: Audit Plan and Agenda
JJ Richards and Sons Pty Ltd
Glendenning Liquid Waste Treatment Facility
Site address: 14 Rayben St, Glendenning
Date: Thursday 11th March 2021
Time: 9am to 1:30pm

Introduction to the audit:

Jackson Environment and Planning Pty Ltd has been engaged by JJ Richards and Sons Pty Ltd to undertake an Independent Environmental Audit of the Glendenning Liquid Waste Treatment Facility (the Site), located at 14 Rayben St, Glendenning. This audit is required under Condition C9 of the Development Consent (SSD 6767). The audit will also include the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C9.

The objective of the Independent Environmental Audit (the Audit) is to assess the environmental performance of the Site since the last audit completed in June 2018. This Audit will cover the period between 15th June 2018 to 11th January 2021.

The independent audit will be performed in accordance with the NSW Department of Planning and Environment's *Independent Audit – Post Approval Requirements* June 2018 and *AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems* (2018).

The Department of Planning, Industry and Environment approved the audit team on Thursday 11th January 2021.

Audit team

Members of the audit team are outlined below, including site representatives from JJ Richards and Sons 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.

Amiee Hanna	Lawyer	JJ Richards and Sons Pty Ltd
Monique Bachtis	Operations Supervisor – Liquid	JJ Richards and Sons Pty Ltd
Susan Lyell	Regional Manager – NSW/ACT Liquid Infrastructure	JJ Richards and Sons Pty Ltd
Dr Mark Jackson	Director	Jackson Environment and Planning Pty Ltd
Mr Rylan Loemker	Senior Consultant	Jackson Environment and Planning Pty Ltd
Mr Alan Parsons	Director	ARP Risk Management Solutions Pty Ltd

Audit plan

The audit process outlined in ISO 19011 *Guidelines for Auditing Management Systems* (2018) has been used to inform the development of the audit plan. The audit plan including the audit methodology is summarised in Table 1. Audit activities to be performed on site on Thursday 11th March 2021 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 Glendenning Liquid Waste Treatment Facility is currently in operational phase. The closure phase has not been triggered. Based on this, the Operations Phase is the only phase considered as part of the audit scope.

Documentation

The scope of the Audit will be limited to assessing the environmental performance of the Site in accordance the conditions of Development Consent SSD 6767 for the period between 15th June 2018 to 11th January 2021. Records reviewed will fall within this period; however, some site observations will be made by the Auditors that relate to the site inspection and audit on 11th March 2021, which is outside this period.

The scope of the audit included an assessment of the following matters:

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

The audit included the development modifications (Mod 1 to Mod 2 inclusive) as listed above.

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

The Audit also included environmental performance requirements under Environmental Protection Licence (21053) for the same period, however this is not specifically required under Condition C9 of SSD 7075.

Spatial Scope

The Glendenning Liquid Waste Treatment Facility is located at 14 Rayben Street, Glendenning entirely within Lot123 DP870988.

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

Status	Audit plan task
Approved	Letter seeking audit team approval – In accordance with the NSW Department of Planning and <i>Environment’s Independent Audit Post Approval Requirements</i> June 2018, a letter was prepared seeking DPIE approval for the audit team.
Completed	Develop the Audit Plan – An audit plan be developed outlining what will be audited, who will do the auditing, when it will happen and who will be audited, and how much time will be dedicated to each process in the audit. Work will also be assigned to auditors. The audit working papers will also be prepared to identify what the auditors wants to verify, what questions to ask, and what they expect as evidence. The Audit Plan will also include the audit sequence. We will also allow time for consultation with relevant agencies, including NSW EPA, Department of Planning, Industry and Environment and Blacktown City Council in accordance with your consent and the <i>Independent Audit Post Approval Requirements</i> .
Scheduled for Thursday 11 th March 2021.	Conduct the opening meeting – The onsite audit begins with an opening meeting. This is to introduce the auditors, confirm the scope and extent of the audit and discuss the schedule.
	Review documents – After the meeting, any documents immediately presented by JJ Richards and Sons Pty Ltd will be reviewed to gather relevant information that might not have been available before.
	Carry out the audit – The auditors will commence the audit by interviews and collecting the records and observations that will demonstrate if the processes meet the Development Consent conditions and EPL requirements. We will also write to NSW EPA, Department of Planning, Industry and Environment and Blacktown City Council and seek any feedback on the environmental performance of the development.
	Generate findings and conclusions – JEP will generate the audit findings and prepare any audit conclusions to be presented at the closing meeting.
	Conduct the closing meeting – The onsite audit finishes with a closing meeting. This is to present the audit findings and provide JJ Richards and Sons Pty Ltd with the opportunity to discuss and ask questions about the audit and findings.
Approx. 2 weeks after site audit (25/03/2021)	Formalise audit findings in a report – The final findings will be formally written and distributed in an audit report. The report will be provided within two (2) weeks of the on-site audit.

An agenda for delivery of the on-site audit on Thursday 11th March 2021 is given in Table 2.

Table 2. Agenda for the on-site audit scheduled for Thursday 11th March 2021.

Agenda item	Item description
1.	0900 - 0915: Introductions (all)
2.	0915 - 0930: Confirm scope of the audit (Mark)
3.	0930 - 1000: Overview of the Audit Plan (Mark / Rylan) <ul style="list-style-type: none"> • Documents reviewed as part of the desktop audit • Review of gaps in audit data / evidence needed • Complaints data • Timeline for providing audit data • Site inductions and familiarization walk through • Detailed site inspection of operations • Post walk through discussion and additional evidence to be provided • Timeline for preparation of draft and final report for submission to DPE
4.	1000 - 1030: Site inductions and familiarisation walk through (all)
5.	1030 - 1230: Audit of site operations (audit team to split up and to be accompanied by a JJ Richards and Sons Pty Ltd member of staff): <ul style="list-style-type: none"> • Actions to close non-compliances from the last IEA report (Mark) • Environmental monitoring and reporting (Alan) • Community liaison and complaints handling (Alan) • Training, induction, communications and roles / responsibilities under the OEMP (Alan) • Waste management (Rylan) • Air quality (Rylan) • Noise and vibration (Rylan) • Soil and water (Rylan) • Traffic and access (Rylan) • Fire management (Mark) • Visual amenity (Mark) • Heritage (Mark)
6.	1230 - 1300: Review of audit findings and additional evidence required to complete audit.
7.	1300 - 1330: Questions and close

Appendix D – Development Consent Compliance Table

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
PART A – ADMINISTRATIVE CONDITIONS				
	OBLIGATIONS TO MINIMISE HARM TO THE ENVIRONMENT			
A1	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, operation or decommissioning of the Development.	The findings from this audit / site inspection on 11/03/21. Documents sighted: <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	An Operational Environmental Management Plan (OEMP) Version: 1.11 (dated March 2020) has been implemented for the management of environmental risk at the Glendenning Liquid Waste Facility.	Compliant
	TERMS OF CONSENT			
A2	The Applicant shall carry out the Development in accordance with the: <ol style="list-style-type: none"> Development Application (SSD 6767); EIS; RTS; in accordance with MOD 1 and MOD 2; Conditions in Schedule B; The development layout plans and drawings listed at Appendix 1; and management and mitigation measures as identified in Appendix 5. 	The findings from this audit / site inspection on 11/03/21.	An Operational Environmental Management Plan (OEMP) Version: 1.11 (dated March 2020) has been implemented for the management of environmental risk at the Glendenning Liquid Waste Facility.	Compliant
A3	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.	None.	None	Not Triggered

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A4	The Applicant shall comply with any reasonable requirements of the Secretary arising from the Department's assessment of: <ul style="list-style-type: none"> 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. 	None.	None	Not Triggered
LIMITS OF CONSENT				
A5	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under Section 95 of the EP&A Act.	None.	Development Consent SSD 6767 was issued on 11 January 2017, the facility was constructed between April 2017 and April 2018.	Not Triggered
Waste Limits				
A6	The Applicant shall not receive or process on Site more than 62,000 tonnes of liquid waste per calendar year comprising liquid organic waste (K110 and K120 wastes) and used oil/industrial oil water (J110 and J120 wastes).	Documents sighted: <ul style="list-style-type: none"> • Completed Waste Receiving forms • Waste Inventory Spreadsheet 	The OEMP Section <i>Waste Monitoring Program</i> outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site. The site processed the following quantities of liquid waste: <ul style="list-style-type: none"> • 2018: 27,821.75 tonnes • 2019: 37,182.23 tonnes • 2020: 45,799.84 tonnes 	Compliant
STATUTORY REQUIREMENTS				
A7	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.	The findings from this audit / site inspection on 11/03/21. Documents sighted: <ul style="list-style-type: none"> • EPA Licence No. 21053 	EPA Licence No. 21053 was issued on 4 April 2018 for the Glendenning Liquid Waste Facility.	Compliant

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	BUILDING CODE OF AUSTRALIA			
A8	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 <i>Building Code of Australia</i> (BCA).	None	This condition is not relevant to the current Audit period.	Not Triggered
A9	Prior to the commencement of operation, the Applicant shall provide a report from a PCA demonstrating that the site's buildings and structures comply with the relevant requirements of the BCA and relevant fire safety requirements, to the satisfaction of the Secretary. This report shall identify any non-compliances with the BCA and provide details of measures that would be implemented to address these non-compliances.	None	This condition is not relevant to the current Audit period.	Not Triggered
	ENGINEERING WORKS			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A10	<p>All engineering works must be designed and undertaken in accordance with the relevant aspects of:</p> <ul style="list-style-type: none"> a) Council's Works Specification - Civil (Current Version); b) Council's Engineering Guide for Development (Current Version); c) Council's Development Control Plan (Current Version) including Part J - Water Sensitive Urban Design and Integrated Water Cycle Management; d) Council's Soil Erosion and Sediment Control Policy (Current Version); e) Council's on-Site Detention General Guidelines and Checklist; and f) Upper Parramatta River Catchment Trust's On-Site Stormwater Detention Handbook THIRD Edition December 1999. <p>Design plans, calculations and other supporting documents prepared in accordance with the above requirements must be submitted to Council or the PCA with any application for a Construction Certificate, <i>Road Act 1993</i> or <i>Local Government Act 1993</i> Approval.</p>	None	This condition is not relevant to the current Audit period	Not Triggered
DEMOLITION				
A11	<p>The Applicant shall ensure that all demolition work is carried out in accordance with <i>Australian Standard AS 2601:2001: The Demolition of Structures</i>, or its latest version.</p>	None	This condition is not relevant to the current Audit period	Not Triggered
SURRENDER OF CONSENT				

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A12	<p>Prior to the commencement of operation, or as otherwise agreed to in writing by the Secretary, the Applicant shall surrender all existing development consents for the site listed in Appendix 2 in accordance with Clause 97 of the EP&A Regulation.</p> <p>Note: This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 4A of the EP&A Act. Surrender of a consent or approval should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</p>	None	This condition is not relevant to the current Audit period	Not Triggered
STAGED SUBMISSION OF PLANS OR PROGRAMS				
A13	<p>With the approval of the Secretary, the Applicant may:</p> <ul style="list-style-type: none"> a) submit any strategy, plan or program required by this consent on a progressive basis; and/or b) combine any strategy, plan or program required by this consent. 	None	None	Not Triggered
A14	<p>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.</p>	None	None	Not Triggered
EVIDENCE OF CONSULTATION				

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
A15	Where consultation with any public authority is required by the conditions of this consent, the Applicant shall: <ol style="list-style-type: none"> consult with the relevant public authority prior to submitting the required documentation to the Secretary or the PCA for approval, where required; submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this Development consent. 	None	This condition is not relevant to the current Audit period	Not Triggered
OPERATION OF PLANT AND EQUIPMENT				
A16	The Applicant shall ensure that all plant and equipment used for the Development is: <ol style="list-style-type: none"> maintained in a proper and efficient condition; and operated in a proper and efficient manner. 	The findings from this audit / site inspection on 11/03/21. Documents sighted: <ul style="list-style-type: none"> Facilities Manual 	All plant and equipment are maintained and operated in a proper and efficient manner. Operational and maintenance procedures are clearly defined and understood by site personnel. Usage of selected items were verified during the audit.	Compliant
PROTECTION OF PUBLIC INFRASTRUCTURE				
A17	The Applicant shall: <ol style="list-style-type: none"> repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the Development; and relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the Development. 	None	None	Not Triggered
PART B – ENVIRONMENTAL PERFORMANCE				
WASTE MANAGEMENT				

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
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.	<p>The findings from this audit / site inspection on 11/03/21 and implementation of the Operational Environment Management Plan.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 EPA Licence No. 21053 Waste Inventory Spreadsheet. 	<p>Wastes permitted under SSD 6767 include grease trap waste (K110), Liquid food waste (K120), waste mineral oils (J100) and oil/hydrocarbons mixtures/emulsions in water (J120).</p> <p>Environment Protection Licence No. 21053 allows for the acceptance of grease trap waste, liquid food waste, waste mineral oils and oil/hydrocarbons mixtures/emulsions. The quantity of waste stored at any one time at the premises must not exceed 1212 tonnes. The total amount of waste received and processed at the Premises must not exceed 62,000 tonnes per annum.</p>	Compliant

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
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"> a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; b) include suitable provision to monitor the: <ul style="list-style-type: none"> i. quantity, type and source of waste received on site; and ii. quantity, type and quality of the outputs produced on site. c) ensure that: <ul style="list-style-type: none"> i. all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and ii. staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • The Waste Monitoring Program (and associated forms) within the Operational Environment Management Plan. 	<p>The OEMP Section <i>Waste Monitoring Program</i> outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site.</p>	Compliant
B3	<p>The Applicant shall ensure the transportation of waste is:</p> <ul style="list-style-type: none"> a) undertaken by a transporter authorised to transport such wastes; and b) to a place that can lawfully accept that waste. 	<p>The findings from this audit / site inspection on 11/03/21 and implementation of the Operational Environment Management Plan.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 • Waste Inventory Spreadsheet • “SupMan” Subcontractor Management System 	<p>Waste is transported by an authorised transporter and disposed of at facilities that can lawfully accept the waste. Records were available at site.</p>	Compliant
	Limits on Outputs			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B4	<p>Except for the following, the Applicant shall dispose of all outputs produced on site to a suitably licensed facility or to sewer as Trade Waste:</p> <ul style="list-style-type: none"> a) liquid food waste approved for application to land under the POEO Act and Waste Regulation; and b) treated grease trap waste approved for application to land under the POEO Act and Waste Regulation. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115.3.A. (Activity Grease Trap Waste Disposal) dated 06/02/2019 	<p>Waste is appropriately disposed of to suitably licensed facilities and/or to sewer as Trade Waste. Supporting records were verified.</p>	Compliant
	AIR QUALITY			
	Meteorological Monitoring			
B5	<p>Prior to the commencement of operation, 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 for the life of the Development.</p>	<p>Meteorological station was sighted during the site inspection.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> • Meteorological station data 	<p>Meteorological station was operational at the time of the site inspection</p>	Compliant
	Construction Mitigation			
B6	<p>During construction, the Applicant shall ensure that:</p> <ul style="list-style-type: none"> a) all vehicles on site do not exceed a speed of 30 kilometres per hour; b) all loaded construction vehicles entering or leaving the site have their loads covered; and c) all construction vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking the materials on public roads 	None	<p>This condition is not relevant to the current Audit period.</p>	Not Triggered
	Dust Management			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B7	The premises shall be maintained in a condition which minimises or prevents the emission of dust from the premises.	<p>The findings from this audit / site inspection on 11/03/21.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 	The <i>Air Management</i> Section of the Operational Environment Management Plan provides minimal mitigation measures for the prevention of dust.	Compliant
	Odour			
B8	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	<p>The findings from this audit / site inspection on 11/03/21.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 Odour Management Plan (Version: 2) dated October 2018; Complaints register. 	<p>The <i>Odour Management Plan</i> of the Operational Environment Management Plan provides mitigation measures for the prevention of odours at the site.</p> <p>No complaints have been received.</p>	Compliant
B9	Prior to the commencement of operation, the Applicant shall ensure that any gaps/voids in the external walls, roof structure and between the external walls and roof of the organics building are sealed to prevent fugitive odour emissions unless otherwise approved by the EPA.	None.	This condition is not relevant to the current Audit period.	Not Triggered
B10	Prior to the commencement of operation, the activated carbon filters (or equivalent odour emission control system approved by the EPA) in the organics building must be installed and operational and all point sources for odour emissions must be effectively covered and ducted to the activated carbon filters.	None.	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B11	During operation, the Applicant shall ensure: <ul style="list-style-type: none"> a) the discharge from all vacuum pumps are sent to the odour control system for treatment before discharging to the atmosphere; and b) all external doors of the organics building are kept shut at all times except to allow the ingress and egress of vehicles, materials and personnel. 	The findings from this audit / site inspection on 11/03/21.	The odour control system and external doors of the organics building were being used at the time of the site inspection.	Compliant
	<i>Odour Management Plan</i>			

<p>B12</p>	<p>Prior to the commencement of construction, the Applicant shall prepare an Odour Management Plan to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA; b) describe the measures that would be implemented on site to ensure: <ul style="list-style-type: none"> i. all reasonable and feasible measures are employed to minimise odour emissions, including details of the air pollution control device(s) and all other operational odour mitigation measures; ii. compliance with the relevant conditions of this consent; and iii. contingency measures are deployed to minimise impacts should adverse odour emissions occur or appear likely to occur; c) include procedures for the monitoring of odour emissions in accordance with the requirements of the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales and any requirements of the EPA including a description of monitoring methods, location, frequency and duration. The odour monitoring program shall include, but not be limited to: <ul style="list-style-type: none"> i. results of the complaints handling system; and ii. system and performance review for continuous improvement; d) include well defined performance measures and triggers for the deployment of odour mitigation and contingency measures; e) include a protocol to determine the occurrence of an exceedance of any criteria in the EPL should an exceedance occur; f) include a protocol for detecting activated 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Odour Management Plan (Version: 2) dated October 2018 	<p>The Odour Management Plan meets the requirements of the Development Consent</p>	<p>Compliant</p>
-------------------	--	---	--	------------------

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>carbon breakthrough, and initiating active carbon filter change out (if activated carbon filters are the chosen air emission control system);</p> <p>g) include contingency measures for design or system failure including the ability to retrofit and /or upgrade the air emissions controls; and</p> <p>h) ensure a record is kept of any significantly odorous loads, any management measures implemented in response and any relevant preventative actions</p>			
B13	The Applicant shall carry out the Development in accordance with the Odour Management Plan approved by the Secretary (as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	<p>The findings from this audit / site inspection on 11/03/21.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 Odour Management Plan (Version: 2) dated October 2018; Complaints register. 	<p>The <i>Odour Management Plan</i> of the Operational Environment Management Plan provides mitigation measures for the prevention of odours at the site.</p> <p>No complaints have been received.</p>	Compliant
	Odour Audit			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B14	<p>Within 6 months of the commencement of operation or as otherwise directed by the Secretary, the Applicant shall carry out an Odour Audit of the Development. The audit must:</p> <ul style="list-style-type: none"> a) be carried out by a suitably qualified, experienced and independent expert(s) whose appointment has been endorsed by the Secretary; b) audit the Development whilst in full operation and during receipt of organic waste; c) include sampling and analysis undertaken in accordance with an EPL; d) include a summary of air and odour emission related complaints and any actions that were carried out to address the complaints; e) if odour complaints are received, the audit team must review the meteorological data for the Site and the region to establish the likelihood that the source of odour originated from the development. If it is likely that odour originated from the development, it must be reported in accordance with condition C7; f) validate the Development against the odour predictions in the EIS and RTS; g) review design and management practices of the Development against industry best practice for air emissions and odour management; and h) include an action plan that identifies and prioritises additional air and odour emission mitigation measures that may be necessary to reduce air emissions. <p>Note: The odour audit must be prepared so it addresses the requirements of this consent and the EPL for the Development.</p>	<p>Post-commissioning odour testing was undertaken on 28 August 2018.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> • Post Commissioning Odour Audit prepared by Air Noise Environment and dated 27 September 2018. 	<p>The Odour Audit addresses the requirements of the Development Consent.</p>	Compliant

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)																	
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status													
B15	Within two months of commissioning this audit, the Applicant shall submit a copy of the audit report to the Secretary and the EPA, together with its response to any recommendations contained in the audit report.	Documents sighted: <ul style="list-style-type: none"> Evidence of submission 	None	Compliant													
B16	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Air Emissions Audit.	None	None	Not Triggered													
NOISE AND VIBRATION																	
Construction and Operation Hours																	
B17	The Applicant shall comply with the construction and operation hours in Table 1 unless otherwise agreed to in writing by the Secretary. <table border="1" data-bbox="302 726 862 885"> <caption>Table 1: Hours of Construction and Operation</caption> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Hours</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction</td> <td>Monday – Friday</td> <td>7 am to 6</td> </tr> <tr> <td>Saturday</td> <td>8 am to 1</td> </tr> <tr> <td>Sunday & Public Holidays</td> <td>Nil</td> </tr> <tr> <td>Operation</td> <td>Monday – Saturday</td> <td>4 am to 9</td> </tr> </tbody> </table>	Activity	Day	Hours	Construction	Monday – Friday	7 am to 6	Saturday	8 am to 1	Sunday & Public Holidays	Nil	Operation	Monday – Saturday	4 am to 9	The findings from this audit / site inspection on 11/03/21 and site interviews.	Typically, the site operates from 4am to 5pm.	Compliant
Activity	Day	Hours															
Construction	Monday – Friday	7 am to 6															
	Saturday	8 am to 1															
	Sunday & Public Holidays	Nil															
Operation	Monday – Saturday	4 am to 9															
B18	Despite condition B17, the delivery of material to the site may occur at any time, if that delivery is required by police or other authorities; and/or of there is an on-site emergency that poses an immediate danger to personnel or equipment; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification shall be provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of emergency.	None	None	Not Triggered													
Noise Mitigation																	

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)								
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status				
B19	<p>The Applicant shall:</p> <ul style="list-style-type: none"> a) implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development; b) minimise the noise impacts of the Development during adverse meteorological conditions; c) 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 d) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 • Site checklist • Complaints register 	<p>The <i>Noise Management</i> section of the OEMP provides the principles and processes to ensure that noise emissions do not create a nuisance beyond the boundaries of the Site.</p> <p>Nuisance Noise Management (Attachment 38) is utilised to address management of noise generated at the site to prevent nuisance beyond the boundaries of the Site. Any complaint received regarding nuisance noise beyond the boundaries of the Site will be addressed through the Complaints Management Process.</p>	Compliant				
	Noise Criteria							
B20	<p>The Applicant shall ensure noise from the operation does not exceed the limits in Table 2 below.</p> <table border="1" data-bbox="297 946 857 1061"> <caption>Table 2: Operational Noise Limits</caption> <thead> <tr> <th>Receiver/location</th> <th>Day/Evening/Night L_{Aeq}(15 minutes)</th> </tr> </thead> <tbody> <tr> <td>Receptor groups 1 and 2*</td> <td>36</td> </tr> </tbody> </table> <p>*Refer to the plan in Appendix 4 for the location of residential receivers.</p>	Receiver/location	Day/Evening/Night L _{Aeq} (15 minutes)	Receptor groups 1 and 2*	36	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Complaints register 	No noise monitoring has been carried out. Noise is effectively managed on site.	Compliant
Receiver/location	Day/Evening/Night L _{Aeq} (15 minutes)							
Receptor groups 1 and 2*	36							
	Noise Compliance Measurement							
B21	Noise monitoring shall be undertaken in response to valid complaints or at the request of the Secretary. Noise generated by the Development is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the latest version of the <i>NSW Industrial Noise Policy</i>	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Complaints register 	No noise monitoring has been carried out. Noise is effectively managed on site.	Compliant				
	SOIL AND WATER							

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	Compliance			
B22	A Section 73 Compliance Certificate under the <i>Sydney Water Act</i> 1994 must be obtained from Sydney Water prior to the commencement of operation.	Documents sighted: <ul style="list-style-type: none"> Section 73 Compliance Certificate under the Sydney Water Act 1994 dated 31 May 2017 	None	Compliant
B23	Prior to the discharge of any waste to sewer, the Applicant shall enter into a Trade Waste Agreement with Sydney Water.	Documents sighted: <ul style="list-style-type: none"> Sydney Waste Corporation Consent to Discharge Industrial Trade Wastewater 39115.3.A. (Activity Grease Trap Waste Disposal) dated 06/02/2019 	None	Compliant
	Pollution of Waters			
B24	The Development shall comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided in an EPL.	The findings from this audit / site inspection on 11/03/21.	There is no evidence of pollution of waters.	Compliant
	Stormwater			
B25	The Applicant shall: <ol style="list-style-type: none"> design, install and maintain the stormwater management system generally in accordance the EIS, RTS and as shown in Appendix 3, in consultation with Council; ensure that the system capacity has been designed in accordance with Managing Urban Stormwater: Soils and Construction Vol. 1 (Landcom, 2004); and provide Council a maintenance schedule for the stormwater treatment measures prior to the commencement of construction; and provide Council a reuse hydraulic plan to manage all rainwater reuse on site 	Documents sighted: <ul style="list-style-type: none"> Maintenance manual for water quality improvement devices. 	None.	Compliant

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B26	Prior to the issue of a final Occupation Certificate, the Applicant shall provide a Restriction to User and Positive Covenant under Section 88B of the <i>Conveyancing Act 1919</i> over the stormwater quality devices and rainwater tanks in accordance with the requirements of Council's <i>Engineering Guide for Development 2005</i> .	None	This condition is not relevant to the current Audit period.	Not Triggered
	On-site Detention			
B27	The Applicant shall design and construct any on-site stormwater detention system in accordance with condition A10, in consultation with Council.	None	This condition is not relevant to the current Audit period.	Not Triggered
B28	Prior to the issue of a final Occupation Certificate, the Applicant shall provide a Restriction to User and Positive Covenant under Section 88B of the <i>Conveyancing Act 1919</i> over the on-site detention system in accordance with the requirements of Council's <i>Engineering Guide for Development 2005</i> .	None	This condition is not relevant to the current Audit period.	Not Triggered
	Erosion and Sediment Control			
B29	The Applicant shall implement erosion and sediment control measures on-site in accordance with <i>Managing Urban Stormwater: Soils and Construction Vol. 1</i> (Landcom, 2004).	None	This condition is not relevant to the current Audit period.	Not Triggered
	Bunding			
B30	The Applicant shall store all liquid wastes and materials including chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection - Participant's Manual 2007</i>	The findings from this audit / site inspection on 11/03/21.	Liquid wastes and materials including chemicals, fuels and oils used on-site are stored in appropriately banded areas.	Compliant

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B31	Prior to the commencement of operation, the Applicant shall ensure that: <ul style="list-style-type: none"> a) the bunded areas are impervious to liquids handled or stored in the bunded area; b) the bund does not contain valves; c) all pipe work goes over the bund walls, not through them; d) house couplings for filling/emptying containers/tanks are located in the bunded area; and e) the bund floor is graded to a blind sump located within the bunded area to facilitate the removal of liquids. 	The findings from this audit / site inspection on 11/03/21.	The bunded areas are appropriately constructed.	Compliant
	TRAFFIC AND ACCESS			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B32	<p>The Applicant shall ensure that:</p> <ul style="list-style-type: none"> a) a total of 26 car parking spaces, including one disabled car parking space are provided; b) a total of 14 truck parking spaces are provided; trucks shall only be parked in the designated truck park areas as shown in the Traffic Impact Assessment prepared by Bitzios Consulting version 005 dated 18/02/2016; c) 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; d) the swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTROADS <i>Guide to Road Design</i>; e) the Development does not result in any vehicles parking or queuing on the public road network; f) all vehicles are wholly contained on site before being required to stop; g) all vehicles enter and leave the site in a forward direction; h) heavy vehicles do not leave the site via a right turn movement onto Power Street; and i) heavy vehicles access and egress the site between the hours of 4 am and 9 pm only, unless in accordance with Condition B20. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 	<p>An Operational EMP version 1.3 dated November 2017 is currently in place. The <i>Traffic Management</i> Section of the OEMP discusses driver and vehicle protocols, with further detail reflecting condition requirements outlined in Attachment 47 Drivers Code of Conduct and Attachment 48 Parking Protocol.</p>	Compliant
	Driver Code of Conduct			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B33	<p>Prior to the commencement of operation, the Applicant shall prepare a driver code of conduct that details traffic management measures to be implemented during operation to:</p> <ul style="list-style-type: none"> a) minimise the impacts of the development on the local and regional road network; b) minimise conflicts with other road users; and c) ensure truck drivers use the specified routes. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	<p>An Operational EMP version 1.3 dated November 2017 is currently in place. The <i>Traffic Management</i> Section of the OEMP discusses driver and vehicle protocols, with further detail reflecting condition requirements outlined in Attachment 47 Drivers Code of Conduct.</p>	Compliant
	FIRE MANAGEMENT			
B34	<p>The Applicant shall:</p> <ul style="list-style-type: none"> a) implement suitable measures to minimise the risk of fire on-site including but not limited to the recommendations in the EIS in consultation with Fire and Rescue NSW; b) extinguish any fires on-site promptly; and c) maintain adequate fire-fighting capacity on-site. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. • Training register under the Learning Management System (LMS). 	<p>The sections on <i>Risk Management</i> and <i>Emergency Planning and Management</i> principals identifies fire as a hazard and prevention / detection measures.</p>	Compliant
	VISUAL AMENITY			
	<i>Landscaping</i>			
B35	<p>Prior to the commencement of operation, the Applicant shall implement the Landscape Concept Plan prepared by Jeremy Ferrier Architect dated June 2016, unless otherwise agreed by the Secretary.</p>	None	<p>This condition is not relevant to the current Audit period.</p>	Not Triggered
	<i>Lighting</i>			
B36	<p>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.</p>	None	<p>This condition is not relevant to the current Audit period.</p>	Not Triggered
	<i>Signage</i>			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
B37	<p>The Applicant shall install any new signage in consultation with Council and shall comply with the <i>State Environmental Planning Policy 64 - Advertising and Signage</i>, as relevant.</p> <p>Note: This condition does not apply to signage identified as exempt or complying Development in <i>State Environmental Planning Policy (Exempt and Complying Development Codes) 2008</i>.</p>	None	This condition is not relevant to the current Audit period.	Not Triggered
HERITAGE				
B38	<p>The Applicant shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered. If human remains are uncovered, you must immediately stop work, not further disturb the remains and notify NSW Police. OEH and the Aboriginal community must be contacted if the remains are suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, you must immediately stop work, not further disturb the objects and notify OEH by calling Environment Line on 131 555. Works must not resume in the designated area until the relevant written consent is received from NSW Police and/or OEH. Any Aboriginal objects discovered must be registered on the Aboriginal Heritage Management Information System (AHIMS), in accordance with section 89A of the <i>National Parks and Wildlife Act 1974</i>.</p>	None	This condition is not relevant to the current Audit period.	Not Triggered
SECURITY				
B39	<p>The Applicant shall:</p> <ul style="list-style-type: none"> a) install and maintain a perimeter fence and security gates on the site; and b) ensure that the security gates on site are locked whenever the site is unattended. 	The findings from this audit / site inspection on 11/03/21.	The site is fully fenced and secure.	Compliant
PARTC – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
ENVIRONMENTAL MANAGEMENT				
<i>Construction Environmental Management Plan</i>				

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
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 Secretary. The Plan must:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); b) describe all activities to be undertaken on the site during construction, including a clear indication of construction stages; c) identify the statutory approvals that apply to the Development; d) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management, dust management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment; e) detail how the environmental performance of construction will be monitored, and what actions will be taken to address identified adverse environmental impacts; f) describe the roles and responsibilities for all relevant employees involved in construction; g) include arrangements for community consultation and complaints handling procedures during construction; and h) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent 	None	This condition is not relevant to the current Audit period.	Not Triggered
C2	The Applicant shall carry out the Development in accordance with the Construction Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	None	This condition is not relevant to the current Audit period.	Not Triggered

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	<i>Operational Environmental Management Plan</i>			
C3	<p>The Applicant shall prepare an Operational Environmental Management Plan for the Development to the satisfaction of the Secretary. This strategy must:</p> <ol style="list-style-type: none"> be prepared by a suitably qualified and experienced person(s); provide a strategic framework for environmental management of the Development; identify the statutory approvals that apply to the Development; describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; describe in general how the environmental performance of the Development would be monitored and managed including the management of out of hours heavy vehicle parking; and describe the procedures that would be implemented to: <ol style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the Development; receive, handle, respond to, and record complaints; resolve any disputes that may arise; respond to any non-compliance; and respond to emergencies 	<p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	<p>The site is operated in accordance with the Operational Environmental Management Plan.</p>	Compliant

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C4	The Applicant shall carry out the Development in accordance with the Operational Environmental Management Plan approved by the Secretary (as revised approved by the Secretary from time to time), unless otherwise agreed by the Secretary	<p>The findings from this audit / site inspection on 11/03/21.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 	The site is operated in accordance with the Operational Environmental Management Plan.	Compliant
	Management Plan Requirements			

<p>C5</p>	<p>The Applicant shall ensure that the environmental management plans/strategies required under this consent are prepared in accordance with any relevant guidelines and include:</p> <ul style="list-style-type: none"> a) detailed baseline data; b) a description of: <ul style="list-style-type: none"> i. the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. any relevant limits or performance measures/criteria; iii. the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; and iv. the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; c) a program to monitor and report on the: <ul style="list-style-type: none"> i. impacts and environmental performance of the Development; ii. effectiveness of any management measures; iii. a contingency plan to manage any unpredicted impacts and their consequences; and iv. a program to investigate and implement ways to improve the environmental performance of the Development over time; d) a protocol for managing and reporting any: <ul style="list-style-type: none"> i. incidents; ii. complaints; iii. non-compliances with statutory requirements; iv. exceedances of the impact 	<p>The findings from this audit / site inspection on 11/03/21.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	<p>None.</p>	<p>Compliant</p>
-----------	--	--	--------------	------------------

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	assessment criteria and/or performance criteria; and v. a protocol for periodic review of the plan.			
C6	The Secretary may waive some of the requirements in Condition CS if they are unnecessary or unwarranted for particular management plans/strategies	None.	This condition is not relevant to the current Audit period.	Not Triggered
	REPORTING AND AUDIT			
	Incident Reporting			
C7	The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the Development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	Documents sighted: • Incident register.	No incidents have occurred on site. The site inspection did not identify visual indicators that incidents may have occurred in the past and were not recorded.	Compliant
	Regular Reporting			
C8	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.	There are no specific reporting arrangements in any plans or programs approved under the conditions of the consent however all environmental performance documentation is uploaded to the JJ Richards website.	There are no specific reporting arrangements in any plans or programs approved under the conditions of the consent. Therefore, there are no requirements to provide any regular reporting of the environmental performance on the website.	Compliant
	Independent Environmental Audit			

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C9	<p>Within 1 year of the date of this consent, and every 3 years thereafter, unless the Secretary directs or agrees otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:</p> <ul style="list-style-type: none"> a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Secretary; b) be led by a suitably qualified auditor, and include experts in fields specified by the Secretary; c) include consultation with the relevant agencies; d) include a full odour audit of the Development, taking into consideration the relevant technical guidelines and any odour complaints made since the previous audit; e) 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); f) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and g) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under the consents. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Independent Environmental Audit Report Glendenning Liquid Waste Treatment Facility by Mark Rigby & Associates Pty Ltd dated June 2018. 	<p>An Independent Environmental Audit was carried out by Mark Rigby & Associates Pty Ltd for the period between 11th January 2017 up until 14th June 2018.</p>	Compliant
C10	<p>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.</p>	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Evidence of submission 	None	Compliant

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
C11	<p>Annual Review</p> <p>Within 1 year of the date of this consent, and every year thereafter, the Applicant shall review the environmental performance of the Development. This review must:</p> <ol style="list-style-type: none"> a) describe the Development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year; b) include a report on the previous calendar year's water treatment and non-potable water use; c) 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: <ol style="list-style-type: none"> i. the relevant statutory requirements, limits or performance measures/criteria; ii. requirements of any plan or program required under this consent; iii. the monitoring results of previous years; and iv. the relevant predictions in the EIS; d) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; e) identify any trends in the monitoring data over the life of the Development; f) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and describe what measures will be implemented over the next year to improve the environmental performance of the Development. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Annual Review 2018 dated 10 January 2019 • Annual Review 2019 dated 10 January 2020 • Annual Review 2020 dated 11 January 2021. 	<p>Review of the environment performance of the development has been scheduled to be conducted by the 11th of January annually.</p>	Compliant

Conditions of Development Consent – SSD 6767 (incorporating MOD 1 and 2)				
Consent Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	Revision of Strategies, Plans and Programs			
C12	<p>Within 3 months of the submission of an:</p> <ul style="list-style-type: none"> a) annual review under Condition C11 above; b) incident report under Condition C7 above; c) audit under Condition C9 above; or d) any modification to this consent, <p>the Applicant shall review, and if necessary, revise, the strategies, plans, and programs required under this consent.</p> <p>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.</p>	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	<p>The <i>Monitoring and Review</i> and <i>Records Management</i> sections of the OEMP outline document review processes.</p>	Compliant
C13	<p>The Applicant shall ensure that the operation of the Development is undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary.</p>	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 • Training register under the Learning Management System (LMS). 	<p>The site is operated in accordance with all relevant updated and/or amended strategies, management plans and programs.</p>	Compliant

Appendix E – Environment Protection Licence 20986

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility										
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status						
1	ADMINISTRATIVE CONDITIONS									
A1	<i>What the licence authorises and regulates</i>									
A1.1	<p>This license 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 license, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> </tr> </thead> <tbody> <tr> <td>Waste processing (non-thermal treatment)</td> <td>Non-thermal treatment of liquid waste</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Waste processing (non-thermal treatment)	Non-thermal treatment of liquid waste	Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	<p>Documents sighted:</p> <ul style="list-style-type: none"> EPL 21053 	None.	Compliant
Scheduled Activity	Fee Based Activity									
Waste processing (non-thermal treatment)	Non-thermal treatment of liquid waste									
Waste storage	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste									
A2	<i>Premises or plant to which this licence applies</i>									
A2.1	<p>The licence applies to the following premises:</p> <p><i>J.J. RICHARDS & SONS PTY LTD 14 RAYBEN STREET GLENDENNING NSW 2761</i></p>	The findings from this audit / site inspection on 11/03/21.	None.	Compliant						
A3	<i>Information supplied to the EPA</i>									

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility																
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status												
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.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <ul style="list-style-type: none"> a) the applications for any licences (including former pollution control approvals) which this licence replaces under the <i>Protection of the Environment Operations (Savings and Transitional) Regulation 1998</i>; and 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>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	The site is operated in accordance with the Operational Environment Management Plan.	Compliant												
2	DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND															
P1	<i>Location of monitoring/discharge points and areas</i>															
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1" data-bbox="297 1002 869 1136"> <thead> <tr> <th colspan="4">Air</th> </tr> <tr> <th>EPA identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Lo</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Stack from odour control system in the Organic Waste Building</td> <td>Stack from odour control system in the Organic Waste Building</td> <td>Lo att (Cf</td> </tr> </tbody> </table>	Air				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Lo	1	Stack from odour control system in the Organic Waste Building	Stack from odour control system in the Organic Waste Building	Lo att (Cf	<p>Post-commissioning odour testing was undertaken on 28 August 2018. The Post Commissioning Odour Audit was prepared by Air Noise Environment dated 27 September 2018.</p>	Monitoring point 1 requires a Special Frequency which refers to once off Post Commissioning Monitoring.	Compliant
Air																
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Lo													
1	Stack from odour control system in the Organic Waste Building	Stack from odour control system in the Organic Waste Building	Lo att (Cf													

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility													
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status									
P1.2	<p>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.</p> <table border="1"> <thead> <tr> <th colspan="3">Noise/Weather</th> </tr> <tr> <th>EPA identification no.</th> <th>Type of monitoring point</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>Meteorological Station</td> <td>Location attached (CF_W:)</td> </tr> </tbody> </table>	Noise/Weather			EPA identification no.	Type of monitoring point	Location	2	Meteorological Station	Location attached (CF_W:)	<p>Meteorological station was sighted during the site inspection.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> Meteorological station data. 	<p>Meteorological station was operational at the time of the site inspection.</p>	Compliant
Noise/Weather													
EPA identification no.	Type of monitoring point	Location											
2	Meteorological Station	Location attached (CF_W:)											
3	LIMIT CONDITIONS												
L1	Pollution of waters												
L1.1	<p>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>.</p>	<p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	<p>Section Spill Management and Stormwater Management of OEMP provides control measures to minimise potential for the pollution of waters.</p>	Compliant									
L2	Waste												

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility																								
Licence 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> </tr> </thead> <tbody> <tr> <td>J100</td> <td>Waste mineral oils unfit for their original intended use</td> <td></td> <td>Waste s Waste p (non-th</td> </tr> <tr> <td>J120</td> <td>Waste oil/hydrocarbons mixtures/emulsions in water</td> <td></td> <td>Waste p (non-th treatme Waste s</td> </tr> <tr> <td>K120</td> <td>Liquid Food Waste</td> <td></td> <td>Waste p (non-th treatme Waste s</td> </tr> <tr> <td>K110</td> <td>Grease trap waste</td> <td></td> <td>Waste p (non-th treatme Waste s</td> </tr> </tbody> </table>	Code	Waste	Description	Activity	J100	Waste mineral oils unfit for their original intended use		Waste s Waste p (non-th	J120	Waste oil/hydrocarbons mixtures/emulsions in water		Waste p (non-th treatme Waste s	K120	Liquid Food Waste		Waste p (non-th treatme Waste s	K110	Grease trap waste		Waste p (non-th treatme Waste s	<p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 	<p>The OEMP Section <i>Waste Monitoring Program</i> outlines the process for monitoring the quantity, type and source of waste received and outputs produced on site.</p>	Compliant
Code	Waste	Description	Activity																					
J100	Waste mineral oils unfit for their original intended use		Waste s Waste p (non-th																					
J120	Waste oil/hydrocarbons mixtures/emulsions in water		Waste p (non-th treatme Waste s																					
K120	Liquid Food Waste		Waste p (non-th treatme Waste s																					
K110	Grease trap waste		Waste p (non-th treatme Waste s																					
L2.2	The quantity of waste stored at any one time at the premises must not exceed 1,212 tonnes.	<p>Documents sighted:</p> <ul style="list-style-type: none"> Waste Inventory Spreadsheet. 	The site cannot physically store more liquid waste than permitted due to limitations in storage capacity.	Compliant																				
L2.3	The total amount of waste received and processed at the Premises must not exceed 62,000 tonnes per annum.	<p>Documents sighted:</p> <ul style="list-style-type: none"> Waste Inventory Spreadsheet. 	<p>The site processed the following quantities of liquid waste (tonnes):</p> <ul style="list-style-type: none"> 2018: 27,821.75 2019: 37,182.23 2020: 45,799.84 	Compliant																				

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
L3	Potentially offensive odour			
L3.1	<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>	<p>The findings from this audit / site inspection on 11/03/21.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 Odour Management Plan (Version: 2) dated October 2018 Complaints register. 	<p>The <i>Odour Management Plan</i> of the Operational Environment Management Plan provides mitigation measures for the prevention of odours at the site.</p> <p>No complaints were received.</p> <p>No odours detected outside of building during site inspection.</p>	Compliant
4	OPERATING CONDITIONS			
O1	Activities must be carried out in a competent manner			
O1.1	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <ol style="list-style-type: none"> the processing, handling, movement and storage of materials and substances used to carry out the activity; and the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 	<p>The OEMP Section <i>Waste Monitoring Program</i> outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site.</p>	Compliant
O2	Maintenance of plant and equipment			
O2.1	<p>All plant and equipment installed at the premises or used in connection with the licensed activity:</p> <ol style="list-style-type: none"> must be maintained in a proper and efficient condition; and must be operated in a proper and efficient manner. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 	<p>Section <i>Plant and Equipment Maintenance and Repair</i> provides procedures and checklists to ensure in-situ plant, mobile plant, equipment and vehicles are inspected and maintained.</p>	Compliant
O3	Emergency Response			

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O3.1	Within three (3) months from the issue of the licence, the licensee must develop a Pollution Incident Response Management Plan (PIRMP) in accordance with the requirements in Part5.7A of the <i>Protection of the Environment Operations (POEO) Act</i> .	Documents sighted: <ul style="list-style-type: none"> • Pollution Incident Response Management Plan Version 4 dated June 2020 • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 	Pollution Incident Response Management Plan is current.	Compliant
O3.2	The licensee must maintain, and implement as necessary, a current PIRMP for the premises. The Licensee must keep the PIRMP on the premises at all times. The PIRMP must document systems and procedures to deal with all types of incidents (e.g. spill, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment.	Documents sighted: <ul style="list-style-type: none"> • Pollution Incident Response Management Plan Version 4 dated June 2020 	The Pollution Incident Response Management Plan was last tested on 10 September 2020.	Compliant
O4	Processes and management			
O4.1	All wastes and/or chemicals to be loaded and/or unloaded and/or handled must be carried out within a bunded and covered area.	Documents sighted: <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 	The OEMP Section <i>Waste Monitoring Program</i> outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site.	Compliant
O4.2	All spillages(s) of materials arising from any activity on the premises which is likely to be a source of odour, dust or water pollution, must be contained, cleaned up, treated or disposed of as required to prevent such pollution.	The findings from this audit / site inspection on 11/03/21.	No evidence of spillages.	Compliant
O4.3	All food wastes (waste code K110 and K120) on site must be stored in sealed tanks vented to the activated carbon filter.	The findings from this audit / site inspection on 11/03/21.	None.	Compliant
O4.4	The Dissolved Air Floatation Unit must be contained in a sealed room vented to the activated carbon filter.	The findings from this audit / site inspection on 11/03/21.	The Dissolved Air Floatation Unit is contained in a sealed room vented to the activated carbon filter.	Compliant
O5	Waste Management			

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
O5.1	The licensee must ensure that any liquid and/or non-liquid waste generated and/or stored and/or treated and/or processed and/or reprocessed or destined for off-site transport must be assessed and classified in accordance with the EPA's <i>Waste Classification Guidelines</i> as in force from time to time.	Documents sighted: <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 	The OEMP Section <i>Waste Monitoring Program</i> outlines the process for monitoring the quantity, type and source of waste of waste received and outputs produced on site.	Compliant
O5.2	If waste is transported from the premises, the licensee must ensure that the waste is transported: a) by a waste transporter authorised to transport such waste; and b) to a place that can lawfully accept that waste.	The findings from this audit / site inspection on 11/03/21 and implementation of the Operational Environment Management Plan. Documents sighted: <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 Waste Inventory Spreadsheet "SupMan" Subcontractor Management System. 	Waste is transported by an authorised transporter and disposed of at facilities that can lawfully accept the waste.	Compliant
O5.3	The licensee must ensure that suitable measures (e.g. high/low alarms, control valves with interlock control, one-way valves) are installed on all tanks, ponds or clarifiers and associated pipes and hoses to prevent the spillage of waste.	The findings from this audit / site inspection on 11/03/21.	None	Compliant
5	MONITORING AND RECORDING CONDITIONS			
M1	Monitoring records			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	None.	No monitoring has been carried out.	Compliant
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Documents sighted: <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	The Documentation and Records Management section of the OEMP prescribes processes for record retention.	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility																			
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status															
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Documents sighted: • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020.	The Documentation and Records Management section of the OEMP prescribes processes for record retention.	Compliant															
M2	Requirement to monitor concentration of pollutants discharged																		
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	None.	No monitoring has been carried out.	Compliant															
M2.2	Air Monitoring Requirements POINT 1 <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Odour</td> <td>odour units</td> <td>Special Frequen</td> </tr> <tr> <td>Temperature</td> <td>degrees Celsius</td> <td>Special Frequen</td> </tr> <tr> <td>Velocity</td> <td>metres per second</td> <td>Special Frequen</td> </tr> <tr> <td>Volumetric flowrate</td> <td>cubic metres per second</td> <td>Special Frequen</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Odour	odour units	Special Frequen	Temperature	degrees Celsius	Special Frequen	Velocity	metres per second	Special Frequen	Volumetric flowrate	cubic metres per second	Special Frequen	Post-commissioning odour testing was undertaken on 28 August 2018. The Post Commissioning Odour Audit was prepared by Air Noise Environment dated 27 September 2018.	Monitoring point 1 requires a Special Frequency which refers to once off Post Commissioning Monitoring.	Compliant
Pollutant	Units of measure	Frequency																	
Odour	odour units	Special Frequen																	
Temperature	degrees Celsius	Special Frequen																	
Velocity	metres per second	Special Frequen																	
Volumetric flowrate	cubic metres per second	Special Frequen																	
M2.3	Special Frequency 1 refers to once off Post Commissioning Monitoring	None	None	Not Triggered															
M2.4	Selection of sampling position for Point 1 must comply with the sampling method TM-1.	None	None	Not Triggered															
M3	Testing methods - concentration limits																		

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M3.1	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <ul style="list-style-type: none"> a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place. <p>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</p>	<p>The findings from this audit / site inspection on 11/03/21.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. • Odour Management Plan (Version: 2) dated October 2018 • Complaints register. 	<p>The <i>Odour Management Plan</i> of the Operational Environment Management Plan provides mitigation measures for the prevention of odours at the site.</p>	Compliant
M4	Weather monitoring			

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility																																								
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																																				
M4.1	<p>At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.</p> <table border="1"> <thead> <tr> <th colspan="4">POINT 2</th> </tr> <tr> <th>Parameter</th> <th>Sampling method</th> <th colspan="2">Units of measure</th> </tr> </thead> <tbody> <tr> <td>Siting</td> <td>AM-1</td> <td colspan="2">-</td> </tr> <tr> <td>Siting</td> <td>AM-2</td> <td colspan="2">-</td> </tr> <tr> <td>Rainfall</td> <td>AM-4</td> <td colspan="2">millimetres per hour</td> </tr> <tr> <td>Temperature at 2 metres</td> <td>AM-4</td> <td colspan="2">degrees Celsius</td> </tr> <tr> <td>Temperature at 10 metres</td> <td>AM-4</td> <td colspan="2">degrees Celsius</td> </tr> <tr> <td>Wind Speed at 10 metres</td> <td>AM-2 & AM-4</td> <td colspan="2">metres per second</td> </tr> <tr> <td>Wind Direction at 10 metres</td> <td>AM-2 & AM-4</td> <td colspan="2">Degrees</td> </tr> </tbody> </table>	POINT 2				Parameter	Sampling method	Units of measure		Siting	AM-1	-		Siting	AM-2	-		Rainfall	AM-4	millimetres per hour		Temperature at 2 metres	AM-4	degrees Celsius		Temperature at 10 metres	AM-4	degrees Celsius		Wind Speed at 10 metres	AM-2 & AM-4	metres per second		Wind Direction at 10 metres	AM-2 & AM-4	Degrees		<p>Meteorological station was sighted during the site inspection.</p> <p>Documents sighted:</p> <ul style="list-style-type: none"> Meteorological station data. 	<p>Meteorological station was operational at the time of the site inspection.</p>	Compliant
POINT 2																																								
Parameter	Sampling method	Units of measure																																						
Siting	AM-1	-																																						
Siting	AM-2	-																																						
Rainfall	AM-4	millimetres per hour																																						
Temperature at 2 metres	AM-4	degrees Celsius																																						
Temperature at 10 metres	AM-4	degrees Celsius																																						
Wind Speed at 10 metres	AM-2 & AM-4	metres per second																																						
Wind Direction at 10 metres	AM-2 & AM-4	Degrees																																						
M5	Recording of pollution complaints																																							
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	<p>Documents sighted:</p> <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020 Complaints register. 	<p>The <i>Complaints Management</i> section of the OEMP including recording of complaint details on the <i>General Feedback</i> form.</p> <p>No complaints have been received.</p>	Compliant																																				

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Documents sighted: <ul style="list-style-type: none"> Complaints register 	The <i>Complaints Management</i> section of the OEMP including recording of complaint details on the <i>General Feedback</i> form. No complaints have been received.	Compliant
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Documents sighted: <ul style="list-style-type: none"> Complaints register 	The <i>Complaints Management</i> section of the OEMP including recording of complaint details on the <i>General Feedback</i> form. No complaints have been received.	Compliant
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Documents sighted: <ul style="list-style-type: none"> Complaints register 	No complaints have been received.	Compliant
M6	Telephone complaints line			
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	The findings from this audit / site inspection on 11/03/21.	A telephone complaints line and contact form is available of the JJ Richards website. A phone number is also displayed on the front gate of the site as noted during the site inspection.	Compliant
M6.2	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.	The findings from this audit / site inspection on 11/03/21.	A telephone complaints line and contact form is available of the JJ Richards website. A phone number is also displayed on the front gate of the site as noted during the site inspection.	Compliant
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	None.	None.	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
6	REPORTING CONDITIONS			
R1	Annual return documents			
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"> 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. <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>	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Evidence of submission of Annual Return. 	None.	Compliant
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>	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Evidence of submission of Annual Return. 	None.	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ul style="list-style-type: none"> 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. <p>Note: An application to transfer a licence must be made in the approved form for this purpose</p>	None.	None.	Not Triggered
R1.4	<p>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:</p> <ul style="list-style-type: none"> a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates. 	None.	None.	Not Triggered
R1.5	<p>The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or 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').</p>	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Evidence of submission of Annual Return. 	None.	Compliant
R1.6	<p>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.</p>	None.	None.	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R1.7	<p>Within the Annual Return, the Statement of Compliance must be certified, and the Monitoring and Complaints Summary must be signed by:</p> <ul style="list-style-type: none"> a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder. 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Evidence of submission of Annual Return 	None	Compliant
R2	Notification of environmental harm			
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>	None.	None.	Not Triggered
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.	None.	None.	Not Triggered
R3	Written report			
R3.1	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <ul style="list-style-type: none"> 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. 	None.	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.	None.	None.	Not Triggered

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	None.	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.	None.	None.	Not Triggered
7	GENERAL CONDITIONS			
G1	Copy of licence kept at the premises or plant			
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	The findings from this audit / site inspection on 11/03/21.	A copy of the licence is displayed on site.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	The findings from this audit / site inspection on 11/03/21.	A copy of the licence is available if required.	Compliant
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	The findings from this audit / site inspection on 11/03/21.	A copy of the licence is available if required	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
8	SPECIAL CONDITIONS			
E1	Financial assurance			
E1.1	By 1 st of May 2018 a financial assurance in the form of an unconditional and irrevocable guarantee from an Australian bank, building society or credit union in favour of the EPA in the amount of One Hundred and Five Thousand Dollars (\$105,000) must be provided to the EPA. The Licensee must provide to the EPA, along with the original counterpart guarantee, confirmation in writing that the financial institution providing the guarantees is subject to supervision by the Australian Prudential Regulatory Authority.	None.	None.	Not Triggered
E1.2	The financial assurance must contain a term that provides that any money claimed can be paid to the EPA or, at the written direction of the EPA, to any other person.	None.	None.	Not Triggered
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.	None.	None.	Not Triggered
E1.4	The financial assurance must be replenished by the full amount claimed or realised if the EPA has claimed on or realised the financial assurance or any part of it to undertake a work or program required to be carried out by the licence which has not been undertaken by the licence holder.	None.	None.	Not Triggered
E1.5	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	None.	None.	Not Triggered

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E1.6	The licensee must provide to the EPA the original counterpart guarantee within five working days of the issue of: a) the financial assurance required by conditions E1.1; and b) the adjusted financial assurance as required by condition E1.5	None.	None.	Not Triggered
E2	Claims on Financial Assurances			
E2.1	The EPA may claim on a financial assurance under s303 of the POEO Act if a licensee fails to carry out any work or program required to comply with the conditions of this licence.	None.	None.	Not Triggered
E3	Environmental Obligations of the Licensee			
E3.1	While the licensee’s premises are being used for the purpose to which the licence relates, the licensee must: a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee’s employees or agents. b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA. c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.	Documents sighted: <ul style="list-style-type: none"> Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	None.	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E3.2	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 (whether or not the premises continue to be used for the purposes to which the licence relates) must: <ol style="list-style-type: none"> a) make all efforts to contain all firewater on the licensee’s premises, b) make all efforts to control air pollution from the licensee’s premises, c) make all efforts to contain any discharge, spill or run-off from the licensee’s premises, d) make all efforts to prevent flood water entering the licensee’s premises, e) remediate and rehabilitate any exposed areas of soil and/or waste, f) lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of, g) at the request of the EPA monitor groundwater beneath the licensee’s premises and its potential to migrate from the licensee’s premises, h) at the request of the EPA monitor surface water leaving the licensee’s premises; and i) ensure the licensee’s premises is secure. 	Documents sighted: <ul style="list-style-type: none"> • Operational Environment Management Plan Glendenning Liquid Waste Facility Version: 1.11 dated March 2020. 	None.	Compliant
E3.3	After the licensee’s premises cease to be used for the purpose 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: <ol style="list-style-type: none"> a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee’s premises; and b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination. 	None.	None.	Not Triggered
E4	Post Commissioning Odour Audit			

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E4.1	The Licensee must engage a suitably qualified and experienced consultant to undertake a Post Commissioning Odour Audit of the premises	Documents sighted: <ul style="list-style-type: none"> • Post Commissioning Odour Audit prepared by Air Noise Environment dated 27 September 2018. 	None	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E4.2	<p>The Post Commissioning Odour Audit must include, but is not limited to:</p> <ul style="list-style-type: none"> a) Present the results (including test reports) of post commissioning sampling and analysis for the discharge from activated carbon filter(s) servicing the organic waste process area. The post commissioning sampling and analysis required under condition M2. The sampling methods are those contained in the Approved Methods for Sampling and Analysis of Air Pollutants in NSW (EPA, 2016). Detailed activity data and process description at the time of sampling must be included. b) Compare results of post commissioning sampling with the emission estimation in the Air and Noise Assessment submitted as part of Development Application SSD6767. c) Details and analysis of any odour complaints received and any actions taken to address verified complaints. Any analysis conducted should make reference to the data collected by the onsite meteorological station required under condition M4 and operational details at the time of receiving the complaint. d) An evaluation of the performance of odour mitigation and management measures implemented at the premises, including the activated carbon filters(s). e) Where analysis undertaken in parts (b), (c), (d) indicates the potential for adverse odour beyond the site boundary investigation into additional reasonable and feasible mitigation measures must be conducted. f) The nomination of a timeframe to implement any additional measures identified in part (e). 	<p>Documents sighted:</p> <ul style="list-style-type: none"> • Post Commissioning Odour Audit prepared by Air Noise Environment dated 27 September 2018. 	None.	Compliant

Conditions of EPL 21053 - Glendenning Liquid Waste Treatment Facility				
Licence Condition	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
E4.3	<p>By no later than six (6) months from the date of issue of this Licence, the Licensee must submit a written report to the EPA documenting all actions that are required by condition E4.2. The report must be submitted to the Manager Hazardous Materials, NSW EPA, PO Box A290, Sydney South, NSW, 2001 or electronically to hazardous.materials@epa.nsw.gov.au.</p> <p>Note: Further conditions or Pollution Studies and Reduction Programs may be added onto the Licence pending on the outcomes of this Odour Audit.</p>	<p>Documents sighted:</p> <ul style="list-style-type: none"> Evidence of submission. 	None.	Compliant

Appendix F – Site inspection photographs (taken on 11th March 2020)

Figure 1. Front of the site showing the Used Oil Storage Roof Structure.



2021 Independent Environmental Audit – Glendenning Liquid Waste Facility | 75

Figure 2. Rear of the site.



Figure 3. Bunded area of Used Oil Roof Structure and tank farm.



Figure 4. Bunded area of Used Oil Roof Structure and tank farm.



Figure 5. Loading and unloading of used oil and J120 industrial oily water is undertaken in the bunded area of the Used Oil Roof Structure.



2021 Independent Environmental Audit – Glendenning Liquid Waste Facility | 77
Figure 6. Spill kits are located throughout the facility.



Figure 7. Loading and unloading of liquid grease trap is undertaken in the bunded area within the Organic Waste Building. Roller doors remain closed during unloading to maintain negative pressure for odour control.



2021 Independent Environmental Audit – Glendenning Liquid Waste Facility | 78
Figure 8. Carbon filter odour control unit on top of the enclosed Dissolved Air Flotation Unit within the Organic Waste Building.



Figure 9. Bunded area of Organic Waste Building and tank farm



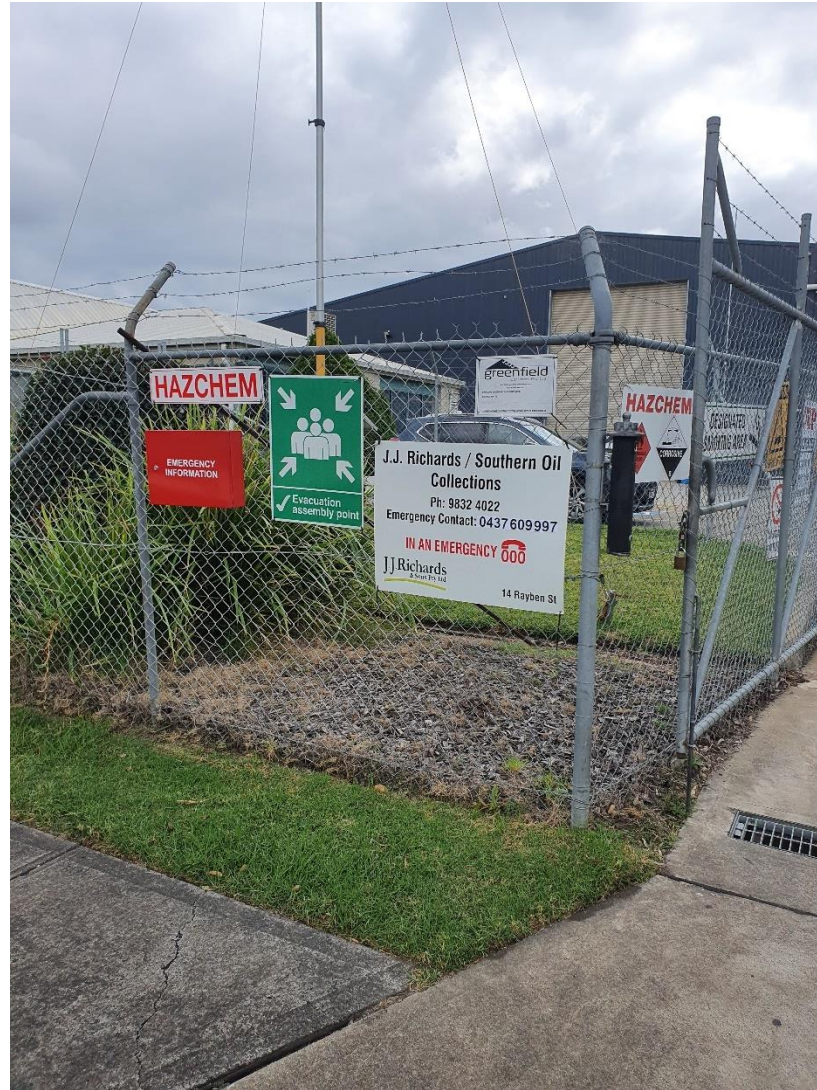
2021 Independent Environmental Audit – Glendenning Liquid Waste Facility | 79
Figure 10. Stormwater drains are regularly maintained.



Figure 11. Rainwater capture system.



Figure 12. Emergency contact details signposted on front entrance.



Appendix G – Consultation Letters



22nd March 2021

Kerry Robinson
Chief Executive Officer
Blacktown City Council
PO Box 63
Blacktown NSW 2148

By email to: council@blacktown.nsw.gov.au

Dear Mr Robinson,

***Re: Agency Consultation – Independent Environmental Audit – J.J. Richards & Sons
Glendenning Liquid Waste Facility***

Jackson Environment and Planning Pty Ltd has been engaged by J.J. Richards & Sons Pty Ltd to undertake an Independent Environmental Audit of the Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning NSW. This audit is required under Condition C9 of the Development Consent SSD 6767. The audit also included the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

Our audit team for this project was approved by the Department of Planning, Industry and Environment on 11th January 2021 and the audit was conducted on 11th March 2021.

The objective of the Independent Environmental Audit (the Audit) was to assess the environmental performance of the site between the 15th June 2018 and 11th January 2021. The independent audit was performed according to the requirements of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018) and ISO 19011 *Guidelines for Auditing Management Systems* (2018).

The audit was conducted on 11th March 2021. The Audit Team found that the Site is operated by JJ Richards to a high standard. JJ Richards operates the development in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development. JJ Richards have not received any complaints and there have been no environment incidents recorded during the Audit Period.

Under Condition C9 of SSD Consent 6767, 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 NSW EPA, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the NSW Department of Planning, Industry and Environment.

Jackson Environment and Planning Pty Ltd would like to present Blacktown City Council with the opportunity to comment on the environmental performance of the Glendenning Liquid Waste Facility, 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 Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD)

Director

Jackson Environment and Planning Pty Ltd

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

T: 02 8056 1849 or M: 0411 060 478

E: mark@jacksonenvironment.com.au

W: www.jacksonenvironment.com.au

Skype: mjjackson_88



23rd March 2021

Ms Janne Grose
Water Regulation Officer
Planning Policy & Assessment Advice
NSW Department of Primary Industries
Level 11, 323 Castlereagh Street Sydney NSW 2000

By email to: janne.grose@environment.nsw.gov.au

Dear Ms Grose,

***Re: Agency Consultation – Independent Environmental Audit – J.J. Richards & Sons
Glendenning Liquid Waste Facility***

Jackson Environment and Planning Pty Ltd has been engaged by J.J. Richards & Sons Pty Ltd to undertake an Independent Environmental Audit of the Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning NSW. This audit is required under Condition C9 of the Development Consent SSD 6767. The audit also included the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

Our audit team for this project was approved by the Department of Planning, Industry and Environment on 11th January 2021 and the audit was conducted on 11th March 2021.

The objective of the Independent Environmental Audit (the Audit) was to assess the environmental performance of the site between the 15th June 2018 and 11th January 2021. The independent audit was performed according to the requirements of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018) and ISO 19011 *Guidelines for Auditing Management Systems* (2018).

The audit was conducted on 11th March 2021. The Audit Team found that the Site is operated by JJ Richards to a high standard. JJ Richards operates the development in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development. JJ Richards have not received any complaints and there have been no environment incidents recorded during the Audit Period.

Under Condition C9 of SSD Consent 6767, 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 NSW EPA, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the NSW Department of Planning, Industry and Environment.

Jackson Environment and Planning Pty Ltd would like to present the NSW Department of Primary Industries with the opportunity to comment on the environmental performance of the Glendenning Liquid Waste Facility, 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 Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD)
Director
Jackson Environment and Planning Pty Ltd
Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060
T: 02 8056 1849 or M: 0411 060 478
E: mark@jacksonenvironment.com.au
W: www.jacksonenvironment.com.au
Skype: mjjackson_88



22nd March 2021

Ms Julia Pope
Team Leader Compliance
Metro Projects
NSW Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

By email to: compliance@planning.nsw.gov.au

Dear Ms Pope,

***Re: Agency Consultation – Independent Environmental Audit – J.J. Richards & Sons
Glendenning Liquid Waste Facility***

Jackson Environment and Planning Pty Ltd was engaged by J.J. Richards & Sons Pty Ltd to undertake an Independent Environmental Audit of the Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning NSW. This audit is required under Condition C9 of the Development Consent SSD 6767. The audit also included the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C9.

As you are aware, the audit team approval was provided by the Department on 11th January 2021.

The objective of the Independent Environmental Audit (the Audit) was to assess the environmental performance of the site between the 15th June 2018 and 11th January 2021. The independent audit was performed according to the requirements of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018) and ISO 19011 *Guidelines for Auditing Management Systems* (2018).

The audit was conducted on 11th March 2021. The Audit Team found that the Site is operated by JJ Richards to a high standard. JJ Richards operates the development in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development. JJ Richards have not received any complaints and there have been no environment incidents recorded during the Audit Period.

Under Condition C9 of SSD Consent 6767, 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 NSW EPA, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the NSW Department of Planning, Industry 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 Glendenning Liquid Waste Facility, 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 Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD)

Director

Jackson Environment and Planning Pty Ltd

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

T: 02 8056 1849 or M: 0411 060 478

E: mark@jacksonenvironment.com.au

W: www.jacksonenvironment.com.au

Skype: mjjackson_88



22nd March 2021

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

By email to: info@epa.nsw.gov.au and stephanie.todd@epa.nsw.gov.au

Dear Ms Todd,

***Re: Agency Consultation – Independent Environmental Audit – J.J. Richards & Sons
Glendenning Liquid Waste Facility***

Jackson Environment and Planning Pty Ltd has been engaged by J.J. Richards & Sons Pty Ltd to undertake an Independent Environmental Audit of the Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning NSW. This audit is required under Condition C9 of the Development Consent SSD 6767. The audit also included the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

Our audit team for this project was approved by the Department of Planning, Industry and Environment on 11th January 2021 and the audit was conducted on 11th March 2021.

The objective of the Independent Environmental Audit (the Audit) was to assess the environmental performance of the site between the 15th June 2018 and 11th January 2021. The independent audit was performed according to the requirements of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements (2018)* and ISO 19011 *Guidelines for Auditing Management Systems (2018)*.

The audit was conducted on 11th March 2021. The Audit Team found that the Site is operated by JJ Richards to a high standard. JJ Richards operates the development in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development. JJ Richards have not received any complaints and there have been no environment incidents recorded during the Audit Period.

Under Condition C9 of SSD Consent 6767, 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 NSW EPA, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the NSW Department of Planning, Industry and Environment.

Jackson Environment and Planning Pty Ltd would like to present the NSW EPA with the opportunity to comment on the environmental performance of the Glendenning Liquid Waste Facility, 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 Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD)

Director

Jackson Environment and Planning Pty Ltd

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

T: 02 8056 1849 or M: 0411 060 478

E: mark@jacksonenvironment.com.au

W: www.jacksonenvironment.com.au

Skype: mjjackson_88



22nd March 2021

Joshua Kpodo
Trade Wastewater Officer
Sydney Water
PO Box 399
Parramatta NSW 2124

By email to: Joshua.kpodo@sydneywater.com.au

Dear Mr Kpodo,

***Re: Agency Consultation – Independent Environmental Audit – J.J. Richards & Sons
Glendenning Liquid Waste Facility***

Jackson Environment and Planning Pty Ltd has been engaged by J.J. Richards & Sons Pty Ltd to undertake an Independent Environmental Audit of the Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning NSW. This audit is required under Condition C9 of the Development Consent SSD 6767. The audit also included the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

Our audit team for this project was approved by the Department of Planning, Industry and Environment on 11th January 2021 and the audit was conducted on 11th March 2021.

The objective of the Independent Environmental Audit (the Audit) was to assess the environmental performance of the site between the 15th June 2018 and 11th January 2021. The independent audit was performed according to the requirements of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018) and ISO 19011 *Guidelines for Auditing Management Systems* (2018).

The audit was conducted on 11th March 2021. The Audit Team found that the Site is operated by JJ Richards to a high standard. JJ Richards operates the development in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development. JJ Richards have not received any complaints and there have been no environment incidents recorded during the Audit Period.

Under Condition C9 of SSD Consent 6767, 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 NSW EPA, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the NSW Department of Planning, Industry and Environment.

Jackson Environment and Planning Pty Ltd would like to present Sydney Water with the opportunity to comment on the environmental performance of the Glendenning Liquid Waste Facility, 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 Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD)

Director

Jackson Environment and Planning Pty Ltd

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

T: 02 8056 1849 or M: 0411 060 478

E: mark@jacksonenvironment.com.au

W: www.jacksonenvironment.com.au

Skype: mjjackson_88



22nd March 2021

Mr Pahee Rathan
Senior Land Use Assessment Coordinator
Transport for NSW
231 Elizabeth Street
Sydney NSW 2000

By email to: development.sydney@rms.nsw.gov.au.

Dear Mr Rathan,

***Re: Agency Consultation – Independent Environmental Audit – J.J. Richards & Sons
Glendenning Liquid Waste Facility***

Jackson Environment and Planning Pty Ltd has been engaged by J.J. Richards & Sons Pty Ltd to undertake an Independent Environmental Audit of the Glendenning Liquid Waste Facility, located at 14 Rayben Street, Glendenning NSW. This audit is required under Condition C9 of the Development Consent SSD 6767. The audit also included the requirements of the Environmental Protection Licence (EPL) for the site, which is not specifically required under Condition C8.

Our audit team for this project was approved by the Department of Planning, Industry and Environment on 11th January 2021 and the audit was conducted on 11th March 2021.

The objective of the Independent Environmental Audit (the Audit) was to assess the environmental performance of the site between the 15th June 2018 and 11th January 2021. The independent audit was performed according to the requirements of the NSW Department of Planning and Environment's *Independent Audit Post Approval Requirements* (2018) and ISO 19011 *Guidelines for Auditing Management Systems* (2018).

The audit was conducted on 11th March 2021. The Audit Team found that the Site is operated by JJ Richards to a high standard. JJ Richards operates the development in accordance with the Conditions of Consent for SSD 6767 and the conditions of EPL 21053. JJ Richards implements all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the development. JJ Richards have not received any complaints and there have been no environment incidents recorded during the Audit Period.

Under Condition C9 of SSD Consent 6767, 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 NSW EPA, Blacktown City Council, Transport for NSW, Sydney Water, NSW Department of Primary Industries and the NSW Department of Planning, Industry and Environment.

Jackson Environment and Planning Pty Ltd would like to present the Transport for NSW with the opportunity to comment on the environmental performance of the Glendenning Liquid Waste Facility, 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 Mr Rylan Loemker, Senior Consultant, Jackson Environment and Planning on 0427 835 607 or email rylan@jacksonenvironment.com.au should you need any further information.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD)

Director

Jackson Environment and Planning Pty Ltd

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

T: 02 8056 1849 or M: 0411 060 478

E: mark@jacksonenvironment.com.au

W: www.jacksonenvironment.com.au

Skype: mjjackson_88

Date: 8 April 2021
Ref: 217402.0013R01V02.docx
To: Amiee Hanna
Company: JJ Richards & Sons
Author: Samuel Wong
Subject: Odour Audit – JJ Richards Glendenning
Pages: 1 of 11



Dear Amiee,

This report letter presents the findings of the odour audit undertaken at the JJ Richards & Sons liquid waste transfer facility located at 14 Rayben Street, Glendenning. The odour audit was undertaken by Samuel Wong (Senior Environmental Engineer, BEng(Chem)) as part of a 3-yearly independent environmental audit required by Condition C9 of the site's Development Consent (11 January 2017).

The site audit was undertaken on Thursday 18 February 2021. A review of site operations was completed to confirm appropriate odour management measures and procedures were being implemented at the site. The audit was undertaken through a general walkaround of the site during a typical operating day, and through specific review of work procedures implemented during the following activities:

- Organics waste building - organics waste truck unloading
- Organics waste building - organics outloading to a B-double truck
- Waste oil area - waste oil truck unloading

A summary of key observations made during the site audit with respect to odour management are provided below. Appendix A presents photos taken during the audit. It is noted that, due to health and safety reasons, photos were not allowed to be taken within the waste oil area.

Organics Waste Building

- General observations
 - The inside of the building was noted to be clean (Figure 1).
 - An odour control unit (OCU) continues to be used on site and connects to all tanks and the DAF enclosure (Figure 4). Sufficient spare activated carbon is provided directly at the OCU area. The OCU fan was running at all times during the site visit. Odour observations from the outlet port of the OCU found only a mild odour indicating the OCU was functioning as expected (a strong organics odour would be expected if breakthrough had occurred).
 - Spill kits are provided at several locations (Figure 2) – unloading area, outloading area and near entrance to DAF enclosure.
 - All 4 roller doors are closed, except to allow vehicles to enter and exit. Signage is provided at roller doors to ensure staff keep roller doors closed at all times, except when vehicles are entering or exiting the building (Figure 3).
- Organics waste truck unloading (Figure 5)
 - The entry roller door was opened to allow a truck to enter, and then closed immediately after.
 - A container and spill kit cloth were placed directly below the truck connection/outlet point to contain any minor spills when opening the outlet, and connecting the unloading hose to it.
 - No odour was observed directly outside the organics building immediately north of the unloading bay.

- After unloading of the truck and prior to a subsequent truck, the solids trap is cleared and air pockets removed to ensure a smooth unloading process occurs (otherwise, the trap can overflow if a build up of material occurs).
- The trap is opened for a short period (less than 30 seconds) to clear necessary debris.
- Momentary odour (strong) was observed inside the building when the trap was opened – odour neutraliser was then used during this process to mask any odour.
- Organics outloading to a B-double truck (Figure 5)
 - As per unloading procedures, a container was placed below the truck connection/outlet point to contain any minor spills when opening the outlet.
 - Roller doors were closed during outloading.
 - Odour was noticeable directly around the truck inside the building, however, no odour was observed along the northern boundary directly opposed the outloading activity or at the front entry (southern boundary).
 - A spill occurred from the outloading truck – it was contained in the bunded area and cleaned up immediately using water, disinfectant and odour neutraliser.

Waste Oil Area

- General observations (Figure 6)
 - The unloading area and area under the waste oil tanks were clean.
 - The sump below the unloading area was empty.
 - Minor residual odour was observed around pipes.
 - Mild odour was detected directly around the unloading area. No odour was detected along the northern, eastern and southern boundary closest to the waste oil area.
 - An activated carbon odour drum is provided on site (connected to the truck outlet when loading each truck to minimise any odour in air displaced from the truck tank during loading).
 - Spill kits are provided in the unloading area.
- Waste oil unloading
 - Oily water was first unloaded from the truck into the IT tank (small open tank) – no odour was observed, even directly above the tank.
 - During pumping of waste oil into on-site storage tanks, no additional odour was observed.
 - A container was placed beneath the truck connection/outlet point to contain any spills during disconnection of the hose.
 - The unloading process was considered to be a relatively clean and simple process with minimal odour.

As detailed above, odour observations made during organics waste and waste oil unloading activity indicated that odour was negligible around the site boundary during these activities. Odour was most noticeable inside the organics waste building during opening of the solids trap and during outloading into a B-double. However, the observations made at the boundary indicate that the management measures are effective in minimising odour impacts at the site boundary and beyond.

Daily odour observations around the on-site trucks, along the site boundary and at the organics OCU outlet port are undertaken by JJ Richards staff. Copies of the odour observation records were observed for the 4 weeks prior to the site visit. These records are shown in Figure 7 to Figure 10.

JJ Richards & Sons have procedures in place to ensure that odorous loads are not processed on site. In general, these procedures involve identifying the waste source, using an odour neutraliser and where required, diverting the waste or having the waste pre-treated (at the source, for future loads). It is understood that an unusually odorous load was received on one occasion in 2020 – upon receipt, the load was inspected, diverted

off site and all loads from this source were stopped to minimise odour impacts and also to avoid damage to the on-site liquid waste process.

JJ Richards & Sons have confirmed that no odour complaints have been received by the site since operations commencement in 2018.

Overall, the observations made on the 18 February 2021 indicated that odour was being effectively managed at the liquid waste transfer facility. Work procedures, which were implemented at the commencement of operations in 2018, continue to be implemented at the site. As noted above, an activated carbon drum is provided for the unloading of waste oil to trucks in the waste oil area. This is considered to be an improvement in odour management measures adopted since commencement and since the previous audit on 22 August 2018.

Yours faithfully

Trinity Consultants Australia



Samuel Wong
Environmental Manager

This report has been prepared by Trinity Consultants Australia Pty Ltd (TCA) ABN: 62 630 202 201, with all reasonable skill, due care and diligence in accordance with TCA Quality Assurance Systems, based on ISO 9001:2015. This report and the copyright thereof are the property of TCA and must not be copied in whole or in part without the written permission of TCA.

This report takes account of the timescale, resources and information provided by the Client, and is based on the interpretation of data collected, which has been accepted in good faith as being complete, accurate and valid.

TCA disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

This report has been produced specifically for the Client and project nominated herein and must not be used or retained for any other purpose. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from TCA.

APPENDIX A – PHOTOS



Figure 1 Organics Waste Building Surfaces

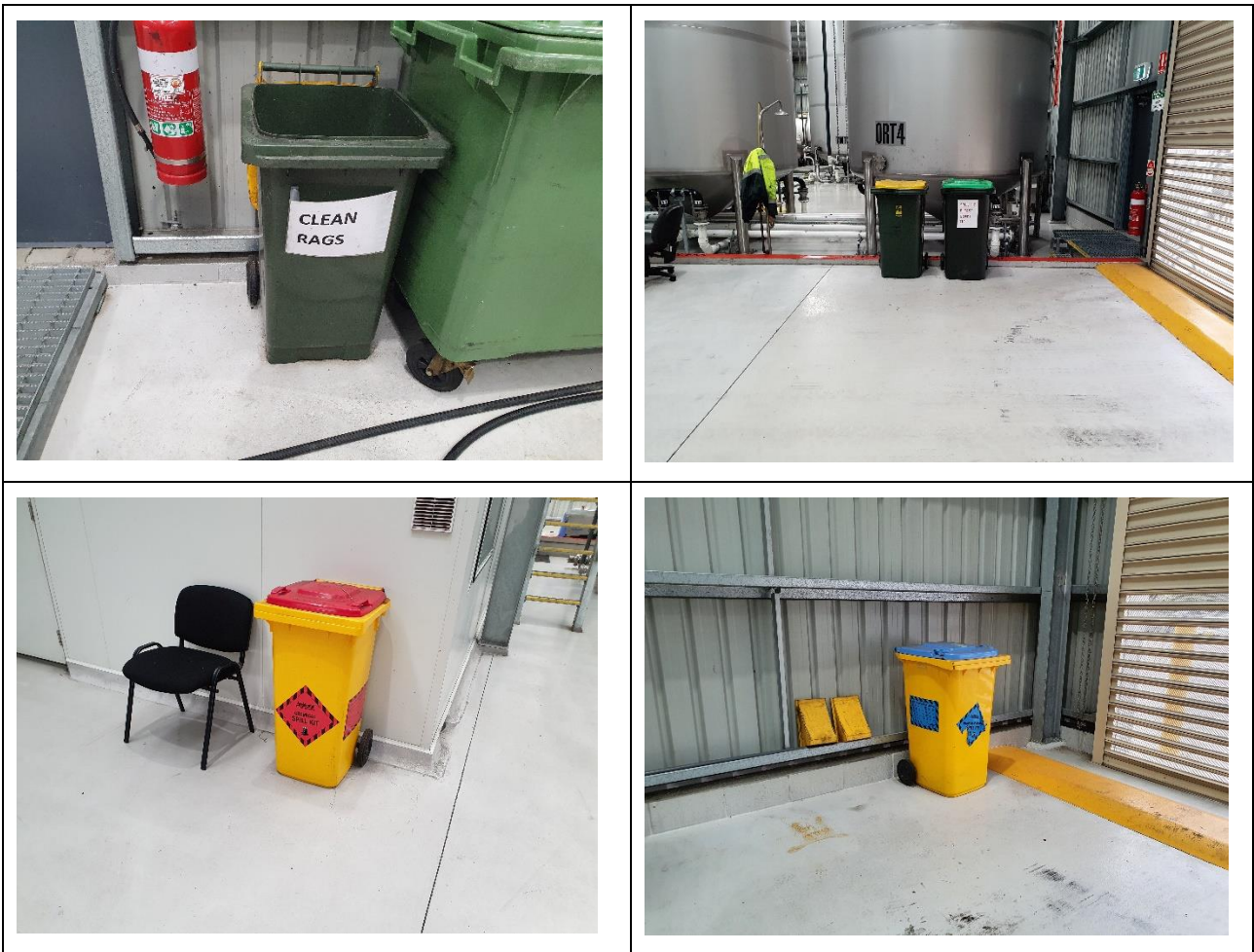


Figure 2 Organics Waste Building – Spill Kits



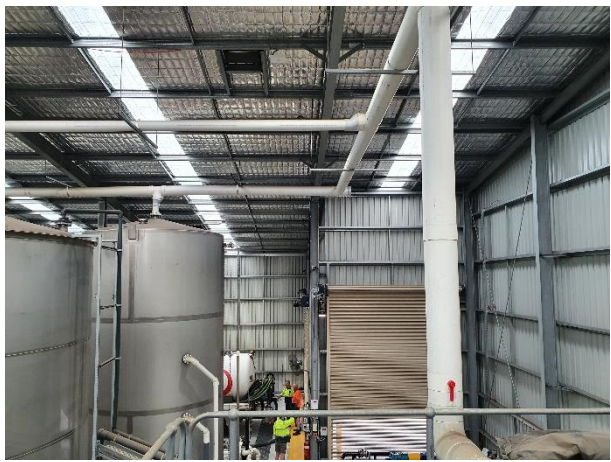
Figure 3 Organics Waste Building – Roller Door Signs



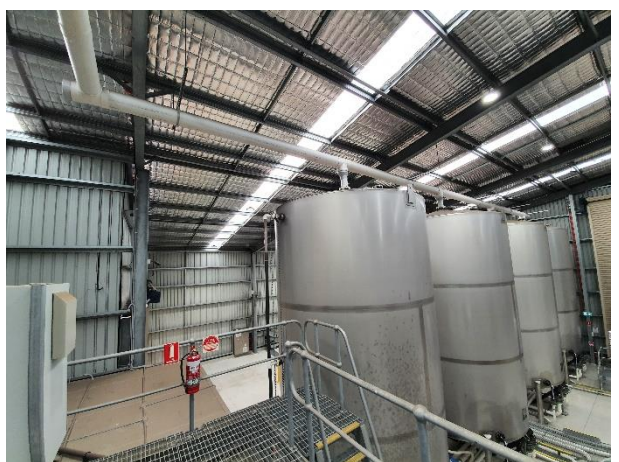
Odour Control Unit



Spare activated carbon



OCU connection to tanks



OCU connection to tanks

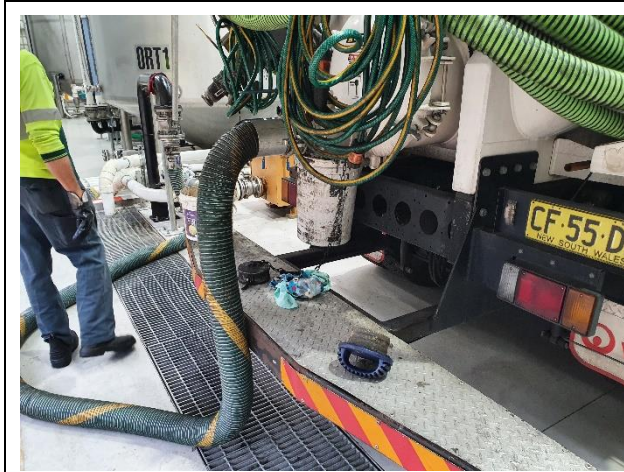


OCU connection to tanks



OCU connection to DAF enclosure

Figure 4 Organics Waste Building – Odour Control Unit

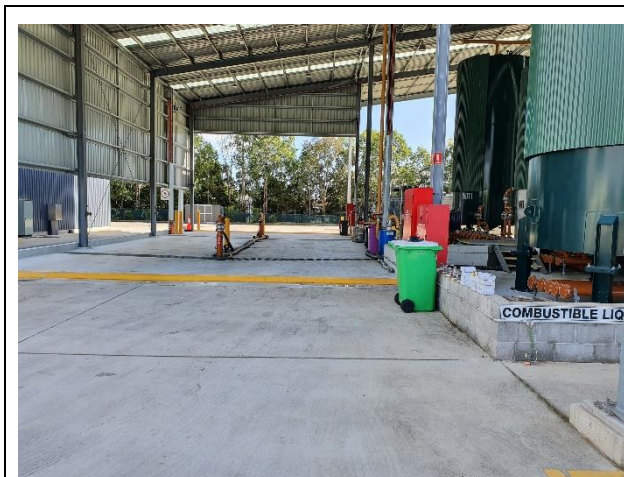


Organics unloading

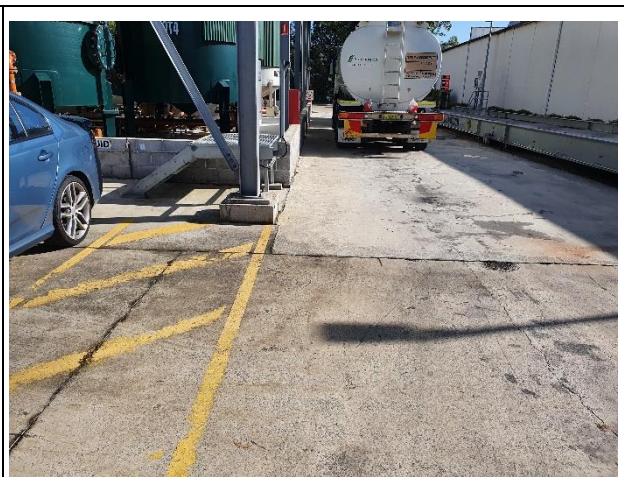


Organics outloading to B-double

Figure 5 Organics Waste Building – Unloading/Outloading Activity



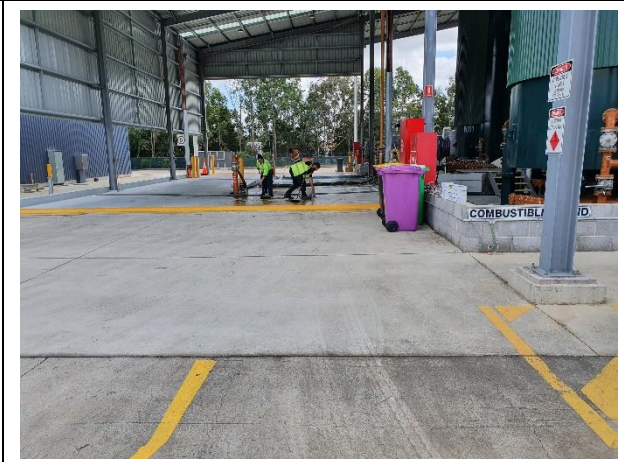
Waste oil unloading area



Weight bridge adjacent to waste oil area



View from northern boundary



Cleaning/washdown of waste oil area

Figure 6 Waste Oil Area

FRM-NSW-ACT-118 Daily Odour Checklist -
Glendenning

JJ.Richards
& Sons Pty Ltd

Date: 8-2-21

Employee: [Signature]

Has an odourous load been detected?							
Item	Mon	Tue	Wed	Thu	Fri	Sat	Sun
On delivery							
Time			ongoing				
If yes, state action taken ^a	NO	NO	NO	NO	NO		
If yes, identify waste source ^b	NO	NO	NO	NO	NO		
During treatment							
Time			ongoing				
If yes, state action taken	NO	NO	NO	NO	NO		
Loading							
Time			ongoing				
If yes, state action taken	NO	NO	NO	NO	NO		
Along the site boundary							
Time			ongoing				
If yes, identify boundary ^c	NO	NO	NO	NO	NO		
If yes, identify weather conditions ^d	NO	NO	NO	NO	NO		

^a Actions to control odour: 1. Declining acceptance of load 2. Closing all treatment facility doors 3. Odour neutralising spray
^b Waste source can be identified by relevant project details (e.g. project or client number, time of delivery).
^c North, East, South or West boundary – provide any further details about specific locations if relevant
^d Weather conditions including wind direction/speed, dry/rainfall.

Carbon Filter Outlet Odour Check							
Item	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Time			ongoing				
Identify odour intensity level ^e	2	2	2	2	2		

^e Odour intensity to be advised in accordance with the following: 0 – Imperceptible; 1 – Barely Perceptible; 2 – Weak; 3 – Distinct; 4 – Strong; 5 – Very Strong; 6 – Unbearably Strong

If odour intensity is less than strong – no further odour checks are required until the following week.
 If odour intensity is strong, very strong or unbearably strong – three (3) further daily checks must be conducted during the week.
 ■ Carbon filter must be immediately changed if the odour intensity is not reducing.

General Notes (Including other tasks performed)

Figure 7 Odour Observations Record – Week Beginning 8 February 2021

Has an odorous load been detected?							
Item	Mon	Tue	Wed	Thu	Fri	Sat	Sun
On delivery							
Time		on going					
If yes, state action taken ^a	NO	NO	NO	NO	NO		
If yes, identify waste source ^b	NO	NO	NO	NO	NO		
During treatment							
Time		on going					
If yes, state action taken	NO	NO	NO	NO	NO		
Loading							
Time		on going					
If yes, state action taken	NO	NO	NO	NO	NO		
Along the site boundary							
Time		on going					
If yes, identify boundary ^c	NO	NO	NO	NO	NO		
If yes, identify weather conditions ^d	NO	NO	NO	NO	NO		

^a Actions to control odour: 1. Declining acceptance of load 2. Closing all treatment facility doors 3. Odour neutralising spray
^b Waste source can be identified by relevant project details (e.g. project or client number, time of delivery).
^c North, East, South or West boundary – provide any further details about specific locations if relevant
^d Weather conditions including wind direction/speed, dry/rainfall.

Carbon Filter Outlet Odour Check							
Item	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Time							
Identify odour intensity level ^e	2	2	2	2	2		

^eOdour intensity to be advised in accordance with the following: 0 – Imperceptible; 1 – Barely Perceptible; 2 – Weak; 3 – Distinct; 4 – Strong; 5 – Very Strong; 6 – Unbearably Strong

If odour intensity is less than strong – no further odour checks are required until the following week.
 If odour intensity is strong, very strong or unbearably strong – three (3) further daily checks must be conducted during the week.

- Carbon filter must be immediately changed if the odour intensity is not reducing.

General Notes (Including other tasks performed)

Issue Date: 10.10.18 Version No: 1 Page 1 of 1
 Site Specific Document

Figure 8 Odour Observations Record – Week Beginning 1 February 2021

Glendenning JJ Richards & Sons Pty Ltd

Date: 25-1-21 Employee: [Signature]

Has an odourous load been detected?							
Item	Mon	Tue	Wed	Thu	Fri	Sat	Sun
On delivery							
Time		ongoing					
If yes, state action taken ^a	NO	HOL	NO	NO	NO		
If yes, identify waste source ^b	NO	HOL	NO	NO	NO		
During treatment							
Time		ongoing					
If yes, state action taken	NO	HOL	NO	NO	NO		
Loading							
Time		ongoing					
If yes, state action taken	NO	HOL	NO	NO	NO		
Along the site boundary							
Time		ongoing					
If yes, identify boundary ^c	NO	HOL	NO	NO	NO		
If yes, identify weather conditions ^d	NO	HOL	NO	NO	NO		

^a Actions to control odour: 1. Declining acceptance of load 2. Closing all treatment facility doors 3. Odour neutralising spray
^b Waste source can be identified by relevant project details (e.g. project or client number, time of delivery).
^c North, East, South or West boundary – provide any further details about specific locations if relevant
^d Weather conditions including wind direction/speed, dry/rainfall.

Carbon Filter Outlet Odour Check							
Item	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Time		Public Hol					
Identify odour intensity level ^e	2	/	2	2	2		

^e Odour intensity to be advised in accordance with the following: 0 – Imperceptible; 1 – Barely Perceptible; 2 – Weak; 3 – Distinct; 4 – Strong; 5 – Very Strong; 6 – Unbearably Strong

If odour intensity is less than strong – no further odour checks are required until the following week.
 If odour intensity is strong, very strong or unbearably strong – three (3) further daily checks must be conducted during the week.
 ▪ Carbon filter must be immediately changed if the odour intensity is not reducing.

General Notes (Including other tasks performed)

Issue Date: 10/10/18 Version No: 1 Page 1 of 1

Figure 9 Odour Observations Record – Week Beginning 25 January 2021

Glendenning J.J. Richards & Sons Pty Ltd

Date: 18-1-21 Employee: PLW

Has an odourous load been detected?							
Item	Mon	Tue	Wed	Thu	Fri	Sat	Sun
On delivery							
Time		on going					
If yes, state action taken ^a	NO	NO	NO	NO	NO		
If yes, identify waste source ^b	NO	NO	NO	NO	NO		
During treatment							
Time		on going					
If yes, state action taken	NO	NO	NO	NO	NO		
Loading							
Time		on going					
If yes, state action taken	NO	NO	NO	NO	NO		
Along the site boundary							
Time		on going					
If yes, identify boundary ^c	NO	NO	NO	NO	NO		
If yes, identify weather conditions ^d	NO	NO	NO	NO	NO		

^a Actions to control odour: 1. Declining acceptance of load 2. Closing all treatment facility doors 3. Odour neutralising spray
^b Waste source can be identified by relevant project details (e.g. project or client number, time of delivery).
^c North, East, South or West boundary – provide any further details about specific locations if relevant
^d Weather conditions including wind direction/speed, dry/rainfall.

Carbon Filter Outlet Odour Check							
Item	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Time							
Identify odour intensity level ^e	2	2	2	2	2		

^e Odour intensity to be advised in accordance with the following: 0 – Imperceptible; 1 – Barely Perceptible; 2 – Weak; 3 – Distinct; 4 – Strong; 5 – Very Strong; 6 – Unbearably Strong

If odour intensity is less than strong – no further odour checks are required until the following week.
 If odour intensity is strong, very strong or unbearably strong – three (3) further daily checks must be conducted during the week.
 ▪ Carbon filter must be immediately changed if the odour intensity is not reducing.

General Notes (Including other tasks performed)

Figure 10 Odour Observations Record – Week Beginning 18 January 2021